

ANNUAL PRETREATMENT PROGRAM STATUS REPORT

for the

CITY OF ROGERS, ARKANSAS

January 2010 - December 2010

Permit No. AR0043397



Submitted to
Arkansas Department of Environmental Quality (ADEQ)

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I. Certification

NPDES Permit Holder: City of Rogers
Report Date: January 27, 2011
Reporting Period: January 2010 – December 2010
POTW: Rogers Pollution Control Facility
Address: 4300 Rainbow Road
Rogers, AR 72758-1440
NPDES Permit Number: AR0043397 – AFIN 04-00155
Effective Date: March 1, 2006
Modified Date: November 1, 2006
Expiration Date: February 28, 2011

For further information concerning this report contact:

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Pretreatment Coordinator
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Rogers, AR 72758-1440
479-273-7378 x109
paulburns@rwu.org

I certify under penalty of law that all the information supplied in this report, including attachments, is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for purposely, knowingly, recklessly or negligently submitting false information.

 1-25-11
Tom McAlister
General Manager
Rogers Water Utilities
Date

II. A. MONITORING RESULTS TABLE III POLLUTANTS REPORTING YEAR: JANUARY 2010 TO DECEMBER 2010

TREATMENT PLANT: City of Rogers
 AVERAGE POTW FLOW: L001 = 6.198 MGD, L002 = 0.954 MGD
 NPDES PERMIT NO. AR0043397
 % STORM WATER INFILTRATION: 4.5
 % IU FLOW: 16.7

| METALS, CYANIDE & PHENOLS (Total) | Units | Maximum Allowable Headworks Level µg/L | Influent Concentrations in µg/L Dates Sampled | | | | Calc. WLAC Level/Limit µg/L | Effluent Concentrations in µg/L Dates Sampled | | | | Laboratory Analysis 2010 | |
|--|--------|--|--|----------|----------|----------|-----------------------------|--|----------|----------|---|-----------------------------|----------------------|
| | | | 02/23-24 | 04/27-28 | 07/20-21 | 10/12-13 | | 02/24-25 | 04/28-29 | 07/21-22 | 10/13-14 | EPA Method | Detection Limit µg/L |
| Antimony | µg/L | na | 1.00 | < 0.50 | 0.18 | 0.40 | na | < 0.20 | 0.36 | 0.42 | 200.8 | 0.20 | 60 |
| Arsenic | µg/L | 25.0 | 1.00 | < 0.10 | 0.72 | 0.70 | 504 | < 0.04 | 0.32 | 0.46 | 200.8 | 0.04 | 0.5 |
| Beryllium | µg/L | na | 0.35 | < 0.15 | < 0.15 | < 0.15 | na | < 0.06 | < 0.06 | < 0.06 | 200.8 | 0.06 | 0.5 |
| Cadmium | µg/L | 19.0 | 0.55 | < 0.10 | 0.15 | 0.15 | 10.30 | < 0.04 | 0.04 | 0.04 | 200.8 | 0.04 | 0.5 |
| Chromium | µg/L | 528 | 2.20 | 2.45 | 3.35 | 2.20 | 1847 | 0.34 | 0.30 | 0.30 | 200.8 | 0.10 | 10.0 |
| Copper | µg/L | 678 | 23.4 | 20.2 | 44.7 | 33.2 | 60.5 | 1.34 | 1.56 | 4.82 | 200.8 | 0.06 | 0.5 |
| Lead | µg/L | 71.0 | 1.80 | 1.15 | 1.95 | 1.85 | 27.6 | 0.14 | 0.16 | 0.20 | 200.8 | 0.02 | 0.5 |
| Mercury | µg/L | 0.8038 | 0.2433 | 0.0869 | 0.0950 | 0.1311 | 0.0167 | 0.0019 | 0.0023 | 0.0006 | 1631 | 0.0002 | 0.005 |
| Molybdenum | µg/L | 53.0 | 2.10 | 1.10 | 0.14 | 2.10 | na | 0.98 | 0.76 | 1.14 | 200.8 | 0.10 | na |
| Nickel | µg/L | 19.0 | 3.75 | < 0.25 | 3.58 | 4.45 | 621 | 1.08 | 1.32 | 2.12 | 200.8 | 0.10 | 0.5 |
| Selenium | µg/L | 16.0 | < 1.0 | < 1.0 | < 1.0 | < 1.0 | 8.28 | < 0.4 | < 0.4 | < 0.4 | 200.8 | 0.4 | 5 |
| Silver | µg/L | 100 | 0.95 | 1.20 | < 0.40 | 0.85 | 25.0 | < 0.16 | < 0.16 | < 0.16 | 200.8 | 0.16 | 0.5 |
| Thallium | µg/L | na | 0.50 | < 0.25 | < 0.25 | < 0.25 | na | < 0.10 | < 0.10 | < 0.10 | 200.8 | 0.05 | 0.5 |
| Zinc | µg/L | 500 | 92.4 | 84.6 | 124.0 | 145.0 | 460 | 36.3 | 36.0 | 65.6 | 200.8 | 1.0 | 20 |
| Cyanide | µg/L | 27.0 | < 10 | < 10 | < 10 | < 10 | 8.5 | < 10 | < 10 | < 10 | 4500-CNf | 10 | 10 |
| Phenols | µg/L | na | 34 | 30 | 19 | 37 | na | 14 | 32 | 8 | 420.1 | 3 | 5 |
| | | | Loading in lb/day | | | | Loading in lb/day | | | | MDL's based on effluent samples which are diluted 2X prior to analysis; MDL's for Influent are higher because the sample were diluted 5X. | | |
| Antimony | lb/day | na | 0.0517 | < 0.0259 | 0.0093 | 0.0096 | na | 0.0155 | < 0.0103 | 0.0186 | 0.0217 | | |
| Arsenic | lb/day | 1.293 | 0.0517 | < 0.0052 | 0.0372 | 0.0167 | 26.07 | 0.0197 | < 0.0021 | 0.0166 | 0.0238 | | |
| Beryllium | lb/day | na | 0.0181 | < 0.0078 | < 0.0078 | < 0.0036 | na | < 0.0031 | < 0.0031 | < 0.0031 | < 0.0031 | | |
| Cadmium | lb/day | 0.983 | 0.0284 | 0.0052 | 0.0078 | 0.0036 | 0.533 | < 0.0021 | < 0.0021 | 0.0021 | < 0.0021 | | |
| Chromium | lb/day | 27.309 | 0.1138 | 0.1267 | 0.1733 | 0.0526 | 95.529 | 0.0176 | 0.0155 | 0.0321 | 0.0155 | | |
| Copper | lb/day | 35.067 | 1.2103 | 1.0448 | 2.3119 | 0.7940 | 3.129 | 0.0693 | 0.0807 | 0.2493 | 0.0765 | | |
| Lead | lb/day | 3.672 | 0.0931 | 0.0595 | 0.1009 | 0.0442 | 1.428 | 0.0072 | 0.0083 | 0.0103 | 0.0072 | | |
| Mercury | lb/day | 0.042 | 0.0126 | 0.00449 | 0.00491 | 0.00313 | 0.00086 | 0.00010 | 0.00007 | 0.00012 | 0.00003 | | |
| Molybdenum | lb/day | 2.741 | 0.1086 | 0.0569 | 0.0072 | 0.0502 | na | 0.0507 | 0.0393 | 0.0590 | 0.0765 | | |
| Nickel | lb/day | 0.983 | 0.1940 | < 0.0129 | 0.1852 | 0.1064 | 32.119 | 0.0559 | < 0.0052 | 0.0683 | 0.1096 | | |
| Selenium | lb/day | 0.828 | < 0.0517 | < 0.0517 | < 0.0517 | < 0.0239 | 0.428 | < 0.0207 | < 0.0207 | < 0.0207 | < 0.0207 | | |
| Silver | lb/day | 5.172 | 0.0491 | 0.0621 | < 0.0207 | 0.0203 | 1.293 | < 0.0083 | < 0.0083 | < 0.0083 | < 0.0083 | | |
| Thallium | lb/day | na | 0.0259 | < 0.0129 | < 0.0129 | < 0.0060 | na | < 0.0052 | < 0.0052 | < 0.0052 | < 0.0052 | | |
| Zinc | lb/day | 25.861 | 4.7790 | 4.3756 | 6.4134 | 3.4678 | 23.792 | 1.8775 | 1.8413 | 1.8620 | 3.3929 | | |
| Cyanide | lb/day | 1.396 | < 0.5172 | < 0.5172 | < 0.5172 | < 0.2392 | 0.440 | < 0.5172 | < 0.5172 | < 0.5172 | < 0.5172 | | |
| Phenols | lb/day | na | 1.7585 | 1.5516 | 0.9827 | 0.8849 | na | 0.7241 | 1.6551 | 0.4138 | 0.4655 | | |
| Flow | MGD | INF | 8.168 | 7.236 | 6.653 | 6.318 | EFF | 7.619 | 7.236 | 7.092 | 6.060 | | |

Samples are collected considering flow detention time through the plant. Analytical MQLs are used. MAHL and WQL calculated during development of 2004 TBL and are based on State Water Quality Standards and implementation procedures. The flow readings (MGD) are reported as average daily flow for the date of the analysis and not the average daily flow for the month. CN and Phenol sampled as grabs, 4 grabs over 24 hours combined to be analyzed as one sample. All other pollutants collected as 24 hr composite samples including Hg. Loadings limits for MAHL and WQL calculated using the average yearly L001 flow of 6.198 MGD.

II. B. RPCF 2010 Priority Pollutant Scan - 40 CFR 122 Appendix D Table II

| Name | CAS No. | Molecular Formula | Type | Influent mg/L | Effluent mg/L | Req MQL |
|---------------------------------|---------|-------------------------------|------|------------------|------------------|---------|
| Chloroform | 67663 | CHCl ₃ | VOC | 0.00187 | 0.00162 | 0.010 |
| Chloromethane (Methyl Chloride) | 74873 | CH ₃ Cl | VOC | 0.00171 | <0.00005 | 0.050 |
| Toluene | 108883 | C ₇ H ₈ | VOC | 0.00060 | <0.00025 | 0.010 |

< Equivalent of not detected

BNA and Pest/PCB all not detected

Influent Grab Samples for VOC, BNA and Pest/PCB collected 04/27/2010

Effluent Grab Samples for VOC, BNA and Pest/PCB collected 04/28/2010

Effluent and Influent VOC dilution factor = 1

Based on the information available to the Control Authority, there was no reason to suspect the presence of any toxic or hazardous pollutants listed in Table V, or any other pollutants known or suspected to adversely affect treatment plant operations, receiving water quality, or solids disposal procedures. For this reason no analysis was conducted.

III. Attachment A
2010 UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

| INDUSTRIAL USER | SIC CODE | CATEGORICAL DETERMINATION | CONTROL DOC | | NEW USER | TIMES INSPECTED | TIMES SAMPLED | BMR | COMPLIANCE STATUS REPORTS | | | |
|---------------------|----------|--|-------------|-------------|----------|-----------------|---------------|-----|---------------------------|-------------|-----------------|-----------------|
| | | | Y/N | LAST ACTION | | | | | 90-DAY COMPLIANCE | SEMI ANNUAL | SELF MONITORING | PERMIT EFFLUENT |
| Bekaert Steel | 2296 | Metal Finishing 433.17 & Iron and Steel 420.96 | Y | 01/01/10 | N | 1 | 13 | N/A | N/A | C | C | C |
| Glad Manufacturing | 2673 | Non-categorical | Y | 01/01/10 | N | 1 | 13 | N/A | N/A | C | C | C |
| Kennametal | 3545 | Non-Ferrous Metals 471.54 | Y | 07/01/10 | N | 1 | 18 | N/A | N/A | C | C | C |
| MAFCO | 3443 | Metal Finishing 433.17 | Y | 01/01/10 | N | 1 | 03 | N/A | N/A | C | C | C |
| Model Laundry | 7211 | Non-categorical | Y | 01/01/10 | N | 1 | 13 | N/A | N/A | C | C | C |
| Ozark Mt. Poultry | 2015 | Non-cat Meat&Poultry 432.126* | Y | 01/01/10 | N | 1 | 14 | N/A | N/A | C | C | C |
| Pel-Freez Arkansas | 2015 | Non-cat Meat&Poultry 432.54* | Y | 01/01/10 | N | 1 | 05 | N/A | N/A | C | C | C |
| Preformed Line | 3644 | Aluminum Forming 467.55 | Y | 01/01/10 | N | 1 | 17 | N/A | N/A | C | C | NC |
| Strateline Ind.** | 2297 | Non-cat, Textile Mills 410.86* | Y | 07/01/09 | N | 0 | 04 | N/A | N/A | C | NC | C |
| Superior Ind. Int. | 3363 | Metal Finishing 433.17 | Y | 01/01/10 | N | 1 | 14 | N/A | N/A | C | C | C |
| Tyson Chick-N-Quick | 2015 | Non-cat Meat&Poultry 432.124* | Y | 01/01/10 | N | 1 | 54 | N/A | N/A | C | C | C |
| Tyson of Rogers | 2015 | Non-cat Meat&Poultry 432.124* | Y | 01/01/10 | N | 1 | 57 | N/A | N/A | C | C | C |
| Southeast Poultry | 2015 | Non-cat Meat&Poultry 432.124 | Y | 10/01/10 | Y | 1 | 20 | N/A | C | C | C | NC |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |

* only required to comply with 40 CFR 403 **Strateline went out of business May 2010; water shut off 4/1/10

V. Attachment C

2010 PRETREATMENT PERFORMANCE SUMMARY (PPS)

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY THE EPA. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT DEPARTMENT AUTHORIZATION.

A. General Information

| | | | |
|---|--|-------------|----------------------------|
| Control Authority Name | <u>City of Rogers</u> | | |
| Address | <u>4300 Rainbow Road</u> | | |
| City | <u>Rogers</u> | State / Zip | <u>Arkansas 72758-1440</u> |
| Contact Person | <u>Paul N. Burns, Pretreatment Coordinator</u> | | |
| Contact Telephone | <u>(479) 273-7378 x109</u> | | |
| NPDES Permit No. | <u>AR0043397</u> | | |
| Reporting Period | <u>January 1, 2010 through December 31, 2010</u> | | |
| Total Number of Categorical IUs | <u>5</u> | | |
| Total Number of Significant Non-categorical IUs | <u>8</u> | | |

B. Significant Industrial User Compliance

| | Significant Industrial Users | |
|--|------------------------------|------------------------|
| | <u>Categorical</u> | <u>Non-Categorical</u> |
| 1) No. of SIUs Submitting BMRs/Total No. Required | <u>0 / 0</u> | <u>N / A</u> |
| 2) No. of SIUs Submitting 90-Day Compliance Reports/No. Required | <u>0 / 0</u> | <u>0 / 0</u> |
| 3) No. of SIUs Submitting Semiannual Reports/ Total No. Required | <u>5 / 5</u> | <u>8 / 8</u> |
| 4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule | <u>0 / 0</u> | <u>0 / 0</u> |
| 5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs | <u>0 / 5</u> | <u>0 / 8</u> |
| 6) Rate of Significant Noncompliance for all SIUs (Categorical and Non-Categorical) | <u>0 / 13</u> | |

C. Compliance Monitoring Program

| | Significant Industrial Users | |
|--|------------------------------|-----------------|
| | Categorical | Non-Categorical |
| 1) No. of Control Documents Issued/ Total No. Required | <u>5 / 5</u> | <u>8 / 8</u> |
| 2) No. of Non-sampling Inspections Conducted | <u>5</u> | <u>7</u> |
| 3) No. of Sampling Visits Conducted | <u>7</u> | <u>10</u> |
| 4) No. of Facilities Inspected (non-sampling) | <u>5</u> | <u>7</u> |
| 5) No. of Facilities Sampled | <u>5</u> | <u>7</u> |

D. Enforcement Actions

| | Significant Industrial Users | |
|---|------------------------------|-----------------|
| | Categorical | Non-Categorical |
| 1) No. of Compliance Schedules Issued/No. of Schedules Required | <u>0 / 0</u> | <u>N / A</u> |
| 2) No. of Notices of Violation Issued to SIUs | <u>3</u> | <u>2</u> |
| 3) No. of Administrative Orders Issued to SIUs | <u>0</u> | <u>0</u> |
| 4) No. of Civil Suits Filed | <u>0</u> | <u>0</u> |
| 5) No. of Criminal Suits Filed | <u>0</u> | <u>0</u> |
| 6) No. of Significant Violators (attach newspaper publication) | <u>0</u> | <u>0</u> |
| 7) Amount of Penalties Collected (total dollars/IUs assessed) | <u>0 / 0</u> | <u>0 / 0</u> |
| 8) Other Actions (sewer bans, etc.) | <u>0</u> | <u>0</u> |

The following certification must be signed in order for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.

Paul N Burns
Authorized Representative

01/28/11
Date

VI. Significant Violator Newspaper Publication

There were no Industrial Users listed in the newspaper as significantly noncompliant of permit requirements for the 2010 reporting period.

VII. Pretreatment Program Overview

A. Industrial User List

The Control Authority for the City of Rogers identified and properly characterized five Categorical Significant Industrial Users (SIUs), eight Non-categorical SIUs and two Non-Significant Industrial Users. A list of Industrial Users follows.

Significant Categorical

| Name | NAIC Code | 40 CFR Category | Monitored Process Flow* (gpd) | % of Total IU Process Flow | Permit ID |
|-------------------------|-----------|-----------------|-------------------------------|----------------------------|-----------|
| Bekaert Steel | 314992 | 433.17 & 420.96 | 18,730 | 1.79% | 10-BSC |
| Kennametal | 333515 | 471.54 | 17,830 | 1.71% | 10-KMT |
| MAFCO | 332919 | 433.17 | 1,650** | 0.16% | 10-MFC |
| Preformed Line Products | 335932 | 467.55 | 6,860 | 0.66% | 10-PLP |
| Superior Industries | 331521 | 433.17 | 97,400 | 9.32% | 10-SII |

*Normal production day

**Batch discharge 1/week

Significant Non-categorical

| Name | NAIC Code | 40 CFR Category | Monitored Process Flow** (gpd) | % of Total IU Process Flow | Permit ID |
|------------------------|-----------|-----------------|--------------------------------|----------------------------|-----------|
| Glad Manufacturing | 326111 | | 27,500 | 2.63% | 10-GMC |
| Model Laundry | 812320 | | 9,500 | 0.91% | 10-MLD |
| Ozark Mountain Poultry | 311615 | 432.126* | 74,130 | 7.09% | 10-OMP |
| Pel-Freez Arkansas | 311615 | 432.54* | 23,143 | 2.21% | 10-PFM |
| Southeast Poultry | 311615 | 432.126* | 27,000 | 2.58% | |
| Strateline Industries | 331521 | 410.86* | N/A | N/A | 10-SLI |
| Tyson Chick 'N Quick | 311615 | 432.124* | 398,800 | 38.16% | 10-TCQ |
| Tyson of Rogers | 311615 | 432.124* | 336,280 | 32.17% | 10-TOR |

* Only required to comply with 40 CFR 403

**Normal production day

Non-Significant

| Name | NAIC Code | 40 CFR Category | Process Flow (gpd) | % of Total IU Process Flow | Permit ID |
|---------------|-----------|-----------------|--------------------|----------------------------|------------|
| Cryovac | 326111 | | 3,400 | 0.33 | CSA MOA-11 |
| Harris Baking | | | 3,000 | 0.29 | N/A |

The sum of all the above listed IUs' flow is 1.045 million gpd. Updating Industrial User and nondomestic information is an ongoing process conducted at a frequency that adequately ensures that all Industrial Users are properly characterized at all times. Significant Non-categorical industries are assigned 40 CFR category numbers, but since they discharge to a POTW they are only required to comply with 40 CFR 403 – General Pretreatment Regulations for Existing and New Sources of Pollution. Harris Baking does not have a permit but was required to install a wastewater flume and flow meter when they connected to the sewer in September. Previously all of Harris Baking's process wastewater was being hauled off by tanker truck.

B. Industrial Control Documents

The Control Authority issues permits to each Significant Industrial User to control the contribution to the POTW and to ensure compliance with applicable Pretreatment Standards and Requirements. All SIUs (except for Kennametal, Strateline, and Southeast Poultry) were issued new permits in January of 2010 after receiving permit renewal information and updating fact sheets. Kennametal was reissued a permit in July 2010 after reviewing changes in Kennametal's production based limits. As previously noted Strateline's productions decreased throughout the first quarter of 2010, Strateline's water was shut off in April 2010, and the industry went out of business shortly thereafter. Southeast Poultry started up in April of 2010. They were monitored and advised throughout the second and third quarter of 2010, and then finally permitted in October 2010, once Southeast Poultry began to consistently discharge over 25,000 gallons per day.

C. Industrial Monitoring and Inspection Activities

Each SIU was Control Monitored once during the past pretreatment year by the Control Authority except for Kennametal, Ozark Mountain, Southeast Poultry, and Tyson of Rogers, which were monitored twice (Strateline went out of business before it could be monitored by the Control Authority). Industries required to monitor for cyanide are only Control Monitored 1/year for that parameter. Sampling is usually initiated unannounced unless the industry is a batch discharger. Industrial Users' sampling techniques, auto-sampler programming, and flow meter settings and calibration are evaluated during these activities. Collecting representative samples, using clean sampling techniques, proper pour up and preservation techniques, and following chain of custody guidelines is emphasized. All Industrial Users carry out self-monitoring on a monthly basis or frequency dictated by their permit. Industries increase the frequency of sampling when temporary upsets occur in order to avoid NOV's or higher surcharge fees. The Control Authority inspected all permitted Industrial Users once during 2010. Southeast Poultry was inspected several times prior to being permitted.

D. Industrial Compliance Status

The Control Authority enforces and obtains remedies for Industrial User noncompliance through the use of applicable pretreatment standards and requirements.

Compliant (C): The following nine Industrial Users were compliant with permit and reporting requirements: Bekaert Steel, Glad Manufacturing, Kennametal, MAFCO, Model Laundry, Pel-Freez Arkansas, Superior Industries, Tyson Chick-N-Quick, and Tyson of Rogers.

Noncompliant (NC): The following three Industrial Users were noncompliant with permit requirements: Strateline Industries, Prefomed Line Products, and Southeast Poultry.

- 1) Strateline Industries was in violation in March for failing to submit March 2010 DMRs for L001 and L003 monitoring locations. Strateline did self monitor but the contract lab would not release results due to Strateline not paying past invoices. However the contract lab stated over

the phone that results were within compliance. Strateline was also behind in paying its water bill and the water was shut off 4/1/10. Strateline eventually went out of business during May 2010.

2) Preformed Line Products (PLP) was in violation in January, February, and April. Oil/Grease (O/G) sampling resulted in a monthly average loading that exceeded the oil/grease monthly average loading limits. PLP was issued an NOV for each of the violations. After the January and February violations PLP made improvements to the pretreatment system that included the use of filtration media to remove oil in March 2010. Despite installing the new equipment O/G loads were still too high in April. PLP has not received any violations since April but has had to decrease the number of rinse tank batch discharges per month in order to meet limits. PLP is planning on installing additional oil removal equipment in the near future.

3) Southeast Poultry (SEP) was in violation in December. CBOD sampling resulted in a monthly average loading that exceeded the CBOD monthly average loading limit of 350 mg/L. SEP was issued an NOV for the violation. Results from December 23 indicate that SEP is now in compliance.

Significant Noncompliant (SNC): There were no Industrial Users in significant noncompliance of permit requirements for the 2010 reporting period.

E. General Pretreatment Regulation Requirements

Based on the information available to the Control Authority, there was no interference, pass through, upset, or POTW permit violation that was known or suspected to be caused by industrial contributors. There were no known new pollutants introduced into the treatment works from an indirect discharger. There were also no substantial changes in the volume or character of pollutants being introduced into the treatment works by an existing collection system source.

F. POTW Analytical Results Discussion

Expansion of the wastewater treatment facility was completed in March 2009. The POTW's annual average daily flow rates in MGD are included in the following table. These flow rates are influenced by population growth, stormwater infiltration, and economic trends. The table shows total effluent flow, flow to the creek at location 001, and flow to the golf course at location 002.

| RPCF Effluent Annual Averages in MGD | | | |
|---|------------------|----------------|----------------|
| <u>Year</u> | <u>Eff Total</u> | <u>Eff 001</u> | <u>Eff 002</u> |
| 2003 | 6.142 | 5.765 | 0.378 |
| 2004 | 6.840 | 6.454 | 0.386 |
| 2005 | 6.340 | 5.835 | 0.505 |
| 2006 | 6.315 | 5.695 | 0.621 |
| 2007 | 7.082 | 6.600 | 0.482 |
| 2008 | 9.169 | 9.016 | 0.153 |
| 2009 | 7.752 | 7.058 | 0.694 |
| 2010 | 7.152 | 6.198 | 0.954 |

Metals monitoring includes all pollutants listed in 40 CFR 122 Appendix D, Table III. All Table III pollutants were monitored for on four occasions during 2010, including phenols and cyanide. Refer

to section II. A. for the tabulated results. For all metals except mercury, the effluent dilution factor was typically 2 while the influent dilution factor was typically 5. For mercury, the effluent was not diluted while the influent dilution factor was 5.

Annual influent and effluent priority pollutant scans were conducted in April. The priority pollutant scan includes all parameters listed in 40 CFR 122 Appendix D, Table II. Only chloroform was reported above detection limits for the effluent at a level of 1.62 ppb. Refer to section II. B. for the tabulated results. Chloroform, chloromethane, and toluene were detected in the influent samples but none of the results were above 1.90 ppb. The contract laboratory was able to analyze both effluent and influent for VOCs without dilution, which resulted in very low detection limits.

Biosolids samples were monitored for total metals, cyanide and phenolics, as required by permit during 2010. The sludge was dewatered with a centrifuge and then hauled off site to a land application site in Kansas. On average, the sludge was dewatered to 19.37% Total Solids. The total amount of sludge hauled off for 2010 was 8043 tons, or 1557 tons dry weight. This calculates out to 4.265 dry tons produced per day.

CBOD, TSS, nutrients (NH₃-N, NO₃-N, TN-N, TP-P, and PO₄-P), and O/G analyses were performed on POTW influent and effluent, and industrial samples. All results are entered into the POTW's database. The data is reviewed and trended throughout the year. It should be noted that influent monitoring is influenced by return flows from various treatment plant processes including: centrate from the centrifugation of biosolids, sand filter backwash, and occasional RAS.

Total Phosphorus (TP) is a major pollutant of concern due to its impact on receiving stream quality. The following table compares TP loading from SIUs with RPCF influent and effluent loading for the years 2007 to 2010. Only the top five TP contributors are listed individually. Influent TP loading for 2010 is only slightly higher than 2007. However, the effluent TP load has decreased by more than 55% when comparing 2007 loading with 2010 loading. This is most likely due to the improvements made during the recent expansion (completed March 2009) and good process control carried out by the RPCF Operations staff. In 2010, TOR has decreased its loading impact, but this is offset by increased loading from TCQ and the other major contributors. In 2008, SIUs accounted for 18.4% of the TP load. This has decreased to 15.7% in 2010.

Total Phosphorus Loading in lbs/day: Significant Industrial Users' Impact

| Year | SEP | OMP | SII | TCQ | TOR | All SIUs | Influent | Effluent |
|------|-----|-----|-----|------|------|----------|----------|----------|
| 2007 | N/A | 4.0 | 5.4 | 8.4 | 48.9 | 73.3 | 430 | 42.3 |
| 2008 | N/A | 5.1 | 5.4 | 15.8 | 55.1 | 86.0 | 467 | 58.8 |
| 2009 | N/A | 6.2 | 9.4 | 10.9 | 44.8 | 70.5 | 450 | 16.5 |
| 2010 | 2.7 | 5.8 | 6.5 | 15.2 | 35.9 | 68.7 | 437 | 18.7 |

Variation in water usage was related to an increase in irrigation in dry years and a decrease in irrigation in wet years. The following table displays water usage trends from 2005 to 2010. The economic recession of 2008 and 2009 influenced the decrease in water usage for all categories. For 2010 residential and commercial usage has increased while industrial usage has slightly decreased. For 2010, commercial usage was at record levels. Industrial water usage has decreased due to TOR only running two of its four production lines and Strateline Industries closing its doors at the beginning of the year.

City of Rogers - Water Usage Trends

Annual Totals in Millions of Gallons

| Year | Residential | Commercial | Industrial | Misc | Total | % Industrial |
|------|-------------|------------|------------|---------|----------|--------------|
| 2005 | 1423.637 | 558.104 | 602.642 | 126.301 | 2709.684 | 22.24 |
| 2006 | 1499.065 | 617.313 | 596.850 | 144.167 | 2857.395 | 20.89 |
| 2007 | 1383.482 | 622.497 | 599.425 | 176.410 | 2781.813 | 21.55 |
| 2008 | 1273.620 | 594.753 | 603.792 | 152.923 | 2625.088 | 23.00 |
| 2009 | 1315.206 | 580.440 | 521.372 | 141.136 | 2558.154 | 20.38 |
| 2010 | 1443.800 | 638.200 | 516.594 | 96.578 | 2694.771 | 19.16 |

G. Oil and Grease Abatement

The City of Rogers is committed to protecting the collection system from excess fats, oils, and greases (FOG) in order to prevent blockages and overflows. The Rogers Water Utilities performs the following FOG program duties:

- 1) New construction and renovation plans for food service businesses are reviewed on a continual basis to ensure that the facilities are plumbed properly;
- 2) Food service businesses are evaluated to determine grease interceptor sizing; and new grease interceptor installations are inspected prior;
- 3) Grease interceptors are sized according to the food served, number of patrons, hours of operation and number of grease-generating appliances and appurtenances.
- 4) On-site inspections at existing food service establishments are performed to ensure compliance with grease abatement regulations and to address problem areas.
- 5) Other businesses that contribute oils and greases into the sanitary sewer system, such as car washes and auto maintenance shops, are also of concern. These businesses are evaluated to determine if oil/water interceptors are required.

The type of waste, volume and consequent loading in Rogers, continues to shift more towards a domestic and service-based waste versus industrial and hazardous waste. This shift continues to present a challenge of keeping the Non-Significant Industrial Users and service-based businesses informed and compliant with pollution prevention guidelines. This pretreatment program is committed to addressing this challenge. Over 30 restaurants with grease interceptors were inspected in 2010. This is a decrease from the number of inspections carried out in previous years because of job cuts. Looking forward, the plan for 2011 is to significantly increase the number of FOG related inspections.

H. Surcharge Summary

Surcharge fees are assessed for each day TSS or CBOD results are above 300 mg/L. The number of days for the surcharge is determined by the total number of operational days between known concentrations below 300 mg/L. Surcharge fees are collected to cover the extra operational cost associated with higher strength waste. Surcharge fees are not considered violations.

| Industry | Surcharge Type | Month | Penalties |
|----------|----------------|--------------|-----------|
| SEP | CBOD/TSS | Jun & Jul 10 | \$620.52 |
| SEP | CBOD/TSS | Aug 10 | \$254.36 |
| TOR | CBOD | Oct 10 | \$129.73 |
| TCQ | CBOD | Dec 10 | \$166.53 |
| SEP | CBOD | Dec 10 | \$165.07 |

I. Pretreatment Audit

The last major pretreatment program audit was conducted by Arkansas Department of Environmental Quality on May 13-15, 2008, by Mr. Allen Gilliam, State Pretreatment Coordinator. Ms. Alison West of the ADEQ Fayetteville Field Office audited the IPT Program in December of 2009. The Rogers Pretreatment Program is currently compliant with all pretreatment requirements.

J. Pollution Prevention (P²) Assessment Update

The Rogers pretreatment program continues to make common sense pollution prevention measures a high priority. All Industrial Users are kept apprised of any new or revised regulation and the potential impact the regulation could have on the industry. All significant industries in Rogers have P2 plans. Industries review and/or revise their P2 plans on an annual basis. Industrial Users are encouraged to examine the production process for potential losses of material, energy, and water and then develop and implement improvements. Several industries in Rogers have obtained ISO 14001 Environmental Certification or are working to do so. Special recognition goes out to Bekaert for making major improvements to their environmental programs over the past two years.

VIII. City of Rogers Industrial Pretreatment Contacts

Bekaert Corp.

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Kennametal

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Ozark Mountain Poultry

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Tyson Chick-N-Quick

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Tyson of Rogers

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alt Carla Bray 479-986-3216

Updated 01/19/2011

PPS Program Report

* NPDES ID: AR0043397

Permittee's Name Rogers

* Report Received/Event Date: 2/4/11

Date 2/7/11

Report Type

- Biosolids Program Report
- CAFO Annual Report
- CSO Event Report
- Local Limits Report
- MS4 Program Report
- Pretreatment Performance Summary Report
- SSO Annual Report
- SSO Event Report
- SSO Monthly Event Report
- Storm Water Event Report

Report Information

* Pretreatment Performance Summary Start Date: 1/1/10

Significant Industrial Users (SIUs)

- SIUs: 13
- SIUs Without Control Mechanism: 0
- SIUs Not Inspected: 0
- SIUs Not Sampled: 0
- SIUs in SNC with Pretreatment Standards: 0
- SIUs in SNC with Reporting Requirements: 0
- SIUs in SNC with Pretreatment Schedule: 0
- SIUs in SNC Published in Newspaper: 0
- SIUs Schedules: 0
- Violation Notices Issued to SIUs: 5
- Administrative Orders Issued to SIUs: 0
- Civil Suits Filed Against SIUs: 0
- Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

- CIUs: 5
- CIUs in SNC: 0

Penalties

Dollar Amount of Penalties Collected: \$

Industrial Users (IUs) from which Penalties have been collected:

Other Information

SUO Reference:

SUO Date:

Annual Pretreatment Budget: \$

Pass-Through/Interference Indicator:

Notification of IU Schedule for Remedial Measures: No

Initial Response to Violation of IU Schedule for Remedial Measures:

Local Limits

Date of Most Recent Technical Evaluation & or Local Limits:

Date of Most Recent Adoption of Technically Based Local Limits:

Local Limit Pollutants:

Removal Credits

Removal Credits Application Status: Not Applicable

Date of Most Recent Removal Credits Approval:

Removal Credits:

Acceptance of Waste

Acceptance of Hazardous Waste: No

Acceptance of Non-Hazardous Industrial Waste: No

Acceptance of Hauled Domestic Wastes: No

Deficiencies

Deficiencies Identified During IU File Review: No

Control Mechanism Deficiencies: No

Legal Authority Deficiencies: No

Deficiencies in Data Management and Public Participation: No

Deficiencies in Interpretation and Application of Pretreatment Standards: No

Inadequacy of Sampling and Inspections: No

Adequacy of Pretreatment Resources: Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling:

Annual Frequency of Effluent Toxicant Sampling:

Annual Frequency of Sludge Toxicant Sampling: