

## Gage, Hannah

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**From:** Gilliam, Allen  
**Sent:** Thursday, January 28, 2016 10:06 AM  
**To:** 'Paul Burns'  
**Cc:** Earl Rausch; Robert Moore; Cary Roth; Gage, Hannah; Kaelin, Cynthia; Ramsey, David  
**Subject:** AR0043397\_Rogers Jan 2016 annual Pretreatment Program report\_20160128  
**Attachments:** Rogers AR 2015 Pretreatment Status Report.pdf

Paul,

Rogers' January 2016 annual Pretreatment report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i).

Thank you for the detailed industry contact information. This will benefit Rogers when EPA's Electronic Reporting Rule's Phase II goes into effect 12/21/20. To my knowledge, no efforts are being made at this time to develop the ADEQ e-portal for Pretreatment reports.

Note: Section VIII of the report has an incorrect address for WestRock; not necessary to re-submit.

There are no further actions deemed necessary at this time.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

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**From:** Paul Burns [<mailto:PaulBurns@RWU.ORG>]  
**Sent:** Thursday, January 21, 2016 3:04 PM  
**To:** Gilliam, Allen  
**Cc:** Earl Rausch; Robert Moore; Cary Roth  
**Subject:** The 2015 annual pretreatment status report for the City of Rogers

Allen,

I've attached the annual pretreatment status report for 2015. If you have any questions or comments please let me know.

Regards,

Paul Burns  
*Pretreatment Coordinator*

**ROGERS WATER UTILITIES**

**ROGERS POLLUTION CONTROL FACILITY**

4300 Rainbow Rd Rogers, AR 72758  
479-273-7378 x306

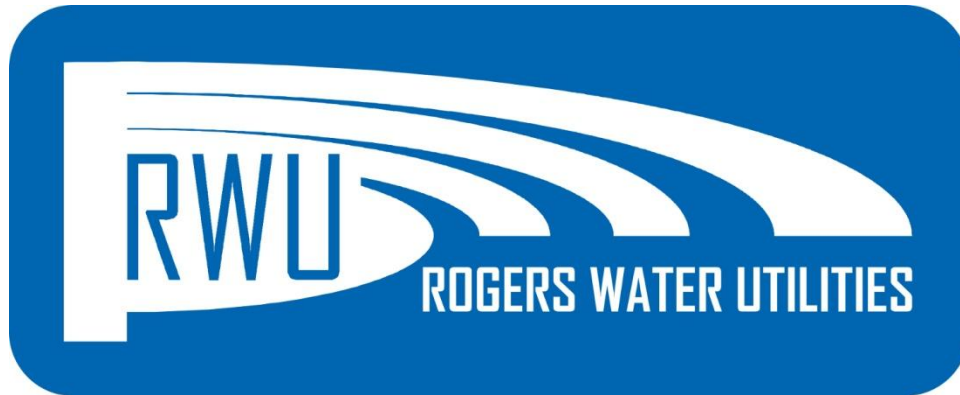
**ANNUAL PRETREATMENT PROGRAM STATUS REPORT**

for the

**CITY OF ROGERS, ARKANSAS**

**January 2015 - December 2015**

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 19<sup>th</sup>, 2016  
Reporting Period: January 2015 – December 2015  
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:

Paul Burns  
Pretreatment Coordinator  
4300 Rainbow Road  
Rogers, AR 72758-1440  
479-273-7378 x306  
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.*

Earl Rausch  
Utility Superintendent  
Rogers Water Utilities

Date

**II. A. MONITORING RESULTS TABLE III POLLUTANTS  
REPORTING YEAR: JANUARY 2015 TO DECEMBER 2015**

TREATMENT PLANT: City of Rogers, Roger Pollution Control Facility  
AVERAGE POTW FLOW: L001 = 7.697 MGD, L002 = 1.093 MGD

NPDES PERMIT NO. AR0043397  
% STORM WATER INFILTRATION: 24.8%      % SIU FLOW: 9.04

METALS, CYANIDE & PHENOLS	Units	MAHC µg/L	Influent Concentrations in µg/L Dates Sampled				WQ Level Limit µg/L	Effluent Concentrations in µg/L Dates Sampled			
			03/09-10	6/09-10	09/21-22	12/07-08		03/10-11	06/10-11	09/22-23	12/08-09
Antimony	µg/L	na	< 2.0	< 2.0	< 1.0	< 1.0	na	< 0.40	< 0.40	0.32	0.26
Arsenic	µg/L	25.0	< 1.0	< 1.0	< 1.0	< 1.0	504	< 0.20	< 0.20	0.30	0.30
Beryllium	µg/L	na	< 1.0	< 1.0	< 1.0	< 1.0	na	< 0.20	< 0.20	< 0.20	< 0.20
Cadmium	µg/L	19.0	< 1.0	< 1.0	< 1.0	< 1.0	10.30	< 0.20	< 0.20	< 0.20	< 0.20
Chromium	µg/L	528	1.4	1.8	1.6	1.2	1847	0.26	0.30	< 0.20	< 0.20
Copper	µg/L	678	20.0	13.0	26.0	24.5	60.5	2.16	< 0.20	1.34	1.60
Lead	µg/L	71.0	1.2	1.2	1.2	1.1	27.6	0.36	0.48	0.26	0.46
Mercury	µg/L	0.8038	0.0555	0.1400	0.069	0.014	0.0167	0.0022	0.0028	0.0029	0.0034
Molybdenum	µg/L	53.0	1.1	1.2	1.3	1.5	na	0.42	0.70	0.58	0.58
Nickel	µg/L	19.0	3.6	4.0	4.3	5.4	621	1.18	1.82	2.02	1.40
Selenium	µg/L	16.0	1.4	< 1.0	< 2.0	< 1.0	8.28	0.40	< 0.20	< 0.40	< 0.20
Silver	µg/L	100	< 1.0	< 1.0	< 1.0	< 1.0	25.0	< 0.20	< 0.20	< 0.20	< 0.20
Thallium	µg/L	na	< 1.0	< 1.0	< 1.0	< 1.0	na	< 0.20	< 0.20	< 0.20	< 0.20
Zinc	µg/L	500	103	132	139	118	460	28.1	26.2	46.6	46.6
Cyanide	µg/L	27.0	< 10	< 10	< 10	< 10	8.5	< 10	< 10	< 10	< 10
Phenols	µg/L	na	33	63	60	49	na	< 5	< 5	< 5	9
			Loading in lb/day					Loading in lb/day			
Antimony	lb/day	na	< 0.154	< 0.134	< 0.051	< 0.077	na	< 0.030	< 0.025	0.016	0.019
Arsenic	lb/day	1.834	< 0.077	< 0.067	< 0.051	< 0.077	37.0	< 0.015	< 0.013	0.015	0.022
Beryllium	lb/day	na	< 0.077	< 0.067	< 0.051	< 0.077	na	< 0.015	< 0.013	< 0.010	< 0.015
Cadmium	lb/day	1.394	< 0.077	< 0.067	< 0.051	< 0.077	0.756	< 0.015	< 0.013	< 0.010	< 0.015
Chromium	lb/day	38.73	0.108	0.121	0.082	0.093	135	0.019	0.019	< 0.010	< 0.015
Copper	lb/day	49.74	1.538	0.871	1.329	1.897	4.44	0.160	< 0.013	0.068	0.119
Lead	lb/day	5.208	0.092	0.080	0.061	0.085	2.02	0.027	0.030	0.013	0.034
Mercury	lb/day	0.059	0.0043	0.0094	0.0035	0.0011	0.00123	0.0002	0.0002	0.0001	0.0003
Molybdenum	lb/day	3.888	0.085	0.080	0.066	0.116	na	0.031	0.044	0.029	0.043
Nickel	lb/day	1.394	0.277	0.268	0.220	0.418	45.554	0.087	0.115	0.102	0.104
Selenium	lb/day	1.174	0.108	< 0.067	< 0.102	< 0.077	0.607	0.030	< 0.013	< 0.020	< 0.015
Silver	lb/day	7.336	< 0.077	< 0.067	< 0.051	< 0.077	1.834	< 0.015	< 0.013	< 0.010	< 0.015
Thallium	lb/day	na	< 0.077	< 0.067	< 0.051	< 0.077	na	< 0.015	< 0.013	< 0.010	< 0.015
Zinc	lb/day	36.68	7.923	8.842	7.104	9.134	33.7	2.081	1.656	2.348	3.467
Cyanide	lb/day	1.981	< 0.769	< 0.670	< 0.511	< 0.774	0.624	< 0.741	< 0.632	< 0.504	< 0.744
Phenols	lb/day	na	2.538	4.220	3.066	3.793	na	< 0.370	< 0.316	< 0.252	< 0.670
Flow	MGD	INF	9.217	8.027	6.124	9.276	EFF	8.875	7.572	6.037	8.915

Laboratory Analysis 2015		
EPA Method	Lab PQL µg/L	EPA MQL µg/L
200.8	0.20	60
200.8	0.20	0.5
200.8	0.20	0.5
200.8	0.20	0.5
200.8	0.20	10.0
200.8	0.20	0.5
200.8	0.20	0.5
1631	0.0005	0.005
200.8	0.20	na
200.8	0.20	0.5
200.8	0.20	5
200.8	0.20	0.5
200.8	0.20	0.5
200.8	20.0	20
4500-CN f	10	10
420.1	5	5

PQL's based on effluent samples which are usually diluted 2X prior to analysis; PQL's for Influent are higher because the samples are usually diluted 10x.

Samples are collected considering flow detention time through the plant. Analytical MQLs are used. MAHL and WQL calculated during development of 2004 TBLL and are based on State Water Quality Standards and implementation procedures. The flow readings (MGD) are reported as 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 sum of L001&L002 flows = 8.790 MGD.

## II. C. RPCF 2015 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	67-66-3	CHCl <sub>3</sub>	Volatiles	0.0101	<0.010	0.010
Toluene	108-88-3	C <sub>6</sub> H <sub>5</sub> CH <sub>3</sub>	Volatiles	0.0134	<0.010	0.010

*BNA all not detected for Effluent*

*VOC and Pest/PCB all not detected for Effluent*

*Influent Grab Samples for VOC, BNA and Pest/PCB collected 06/09/15*

*Effluent Grab Samples for VOC, BNA and Pest/PCB collected 06/10/15*

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  
 PRETREATMENT PROGRAM STATUS REPORT  
 2015 UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User Name	SIC Code	NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status Reports (N/A, C, NC, or SNC)				Permit Limits (Violations)
				Y/N	Last Action				BMR	90 - Day Compliance	Semi Annual	Self Monitoring	
Bekaert Steel	2296, 3315	331222, 314994	433.17 & 420.96	Y	01/01/13	N	1	13	N/A	N/A	C	C	C
Glad Manufacturing	2671, 2673	326111	N/A	Y	01/01/13	N	1	14	N/A	N/A	C	C	C
Kennametal	3545	333515	471.54	Y	01/01/14	N	1	13	N/A	N/A	C	C	C
MAFCO <sup>B</sup>	3443, 3449, 3479	332313, 332812	433.17	Y	01/01/13	N	1	02	N/A	N/A	C	C	C
Ozark Mt. Poultry	2015	311615	432.126 <sup>A</sup>	Y	01/01/13	N	1	25	N/A	N/A	C	C	C
Pel-Freez Arkansas	2015	311611	432.54 <sup>A</sup>	Y	01/01/13	N	1	05	N/A	N/A	C	C	C
Preformed Line	3644	335932	467.55	Y	05/01/13	N	1	21	N/A	N/A	C	C	C
Southeast Poultry	2015	311615	432.126 <sup>A</sup>	Y	01/01/13	N	1	29	N/A	N/A	C	C	C
Tyson C-N-Q	2015	311615	432.124 <sup>A</sup>	Y	01/08/16	N	1	55	N/A	N/A	C	C	C
Tyson of Rogers	2015	311615	432.124 <sup>A</sup>	Y	01/01/16	N	1	51	N/A	N/A	C	C	C
WestRock	2653	322211	N/A	Y	08/01/15	Y	1	16	N/A	N/A	C	C	C

<sup>A</sup> Non-point, only required to comply with 40 CFR 403

<sup>B</sup> MAFCO ceased operating December 31<sup>st</sup> 2015





## V. Attachment C

### 2015 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 x306</u>		
NPDES Permit No.	<u>AR0043397</u>		
Reporting Period	<u>January 1, 2015 through December 31, 2015</u>		
Total Number of Categorical IUs	<u>4</u>		
Total Number of Significant Non-categorical IUs	<u>7</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>n / a</u>
3) No. of SIUs Submitting Semiannual Reports/ Total No. Required	<u>4 / 4</u>	<u>7 / 7</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 / 4</u>	<u>0 / 7</u>
6) Rate of Significant Noncompliance for all SIUs (Categorical and Non-Categorical)	<u>0 / 11</u>	

C. Compliance Monitoring Program

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

D. Enforcement Actions

	Significant Industrial Users	
	<u>Categorical</u>	<u>Non-Categorical</u>
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>0</u>	<u>0</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.

  
 \_\_\_\_\_  
 Authorized Representative

  
 \_\_\_\_\_  
 Date

## VI. Significant Violator Newspaper Publication

There were no significant violators for 2015.

## VII. Pretreatment Program Overview

### A. Industrial User List

The Control Authority for the City of Rogers identified and properly characterized four Categorical Significant Industrial Users (SIUs), seven Non-categorical SIUs and two Non-Significant Industrial Users. A list of Industrial Users follows. The flows below are based on the wastewater flow measured at each SIU's monitoring location. Kennametal and Glad are mixed with sanitary wastewater unlike all the other SIUs. Bekaert's process flow does not include cooling tower overflow.

#### Significant Categorical

Name	40 CFR Category	Avg Monitored Process Flow <sup>1</sup> (gpd)	% of Total SIU Process Flow	Permit ID
Bekaert Steel	433.17 & 420.96	21,905	3.2%	13-BSC
Kennametal	471.54	11,950	1.7%	14-KMT
MAFCO	433.17	1,650 <sup>2</sup>	0.24%	13-MFC
Preformed Line Products	467.55	6,000 <sup>3</sup>	0.43%	13-PLP

<sup>1</sup> Average Flow on normal production day      <sup>2</sup> Batch discharge 1/week      <sup>3</sup> Batch discharge 1/month

#### Significant Non-categorical

Name	40 CFR Category	Monitored Process Flow <sup>1</sup> (gpd)	% of Total SIU Process Flow	Permit ID
Glad Manufacturing		30,064	4.3%	13-GMC
Ozark Mountain Poultry	432.126 <sup>2</sup>	61,464	8.8%	13-OMP
Pel-Freez Arkansas	432.54 <sup>2</sup>	29,101	4.2%	13-PFM
Southeast Poultry	432.126 <sup>2</sup>	45,181	6.5%	13-SEP
Tyson Chick' N Quick	432.124 <sup>2</sup>	371,312	53.3%	13-TCQ.2.1
Tyson of Rogers	432.124 <sup>2</sup>	114,153	16.4%	13-TOR.2
WestRock	n/a	3,000	0.43%	15-RKT.2

<sup>1</sup> Average Flow on normal production day      <sup>2</sup> Only required to comply with 40 CFR 403

#### Non-Significant

Name	40 CFR Category	Process Flow (gpd)	% of Total IU Process Flow	Permit ID
Cryovac		3,400	n/a	CSA MOA-15
Harris Baking		3,000	n/a	N/A

The sum of all the above listed SIU's flow is 0.696 million gallons per day (MGD) – based on flow data from submitted DMRs. This is a decrease from the total flow last year of 0.718 MGD, and two years ago of 0.836 MGD. Updating Industrial User and non-domestic user information is an ongoing process, conducted at a frequency that adequately ensures that all Industrial Users are properly characterized at all times. The

information received from surveying our industrial and commercial customers in 2015 did not result in any new industries being permitted or monitored by the Pretreatment Program.

## 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 Kennametal and Preformed Line Products, were issued new permits as of January 1<sup>st</sup>, 2013. Preformed Line Products was issued a new permit effective May 1<sup>st</sup>, 2013. Kennametal was issued a new permit January 1<sup>st</sup>, 2014. RockTenn was permitted as RockTenn March 2015 after they submitted a permit application. They changed their name from RockTenn to WestRock after a merger August 2015. MAFCO ceased production at the end of 2015 and will most likely finish closing by January 31<sup>st</sup>, 2016. Tyson Chick' N Quick and Tyson of Rogers' permits were modified January 2016 to adjust flow based loading limits.

## C. 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): All 11 Significant Industrial Users were compliant with permit and reporting requirements.

Noncompliant (NC): No Significant Industrial Users were noncompliant with permit requirements.

Significant Noncompliant (SNC): n/a.

## D. Fog Program

2015 was another successful year for the FOG program. 179 Food Service Establishments were inspected. Grease hauler companies began sending manifests through e-mail directly to the Rogers Pollution Control Facility, allowing close tracking of the pumping schedules of many restaurants around Rogers. New NOV forms were created and the regular inspection form was modified to better suit the Food Service Establishments. 30 inspection forms requiring corrective actions were given out and all 30 issues resolved. Rogers Public Schools were successful in installing and repairing a few of their grease interceptors. In 2015 folder packets full of Grease Interceptor Maintenance information were given to all FSEs to better inform them of city requirements and so they may keep all GI information and logs in one place.

"Think Before You Flush" brochures were used as a form of outreach this year. We received a call from the sewer team stating that a lot of grease was coming from one particular apartment complex. The Rogers Pollution Control Facility then visited the apartment manager and gave her the "Think Before You Flush" brochures to hand out to tenants as they paid rent that month. The brochure has a section on Kitchen waste and explains why one shouldn't dump grease down the sink drain. All in all, the FOG program has been a success with more and more restaurants in compliance every year.

## VIII. City of Rogers Industrial Pretreatment Contacts

Company	Permit #	First Name	Last Name	Job Title	E-mail Address	Business Phone	Ext	Mobile Phone	Address
Bekaert Steel	13-BSC	Rodney	Bland	Envir Coord	rodney.bland@bekaert.com	479-631-7661	529	479-619-9601	1 Bekaert Drive
Glad Manufacturing	13-GMC	Mike	Watkins	Envir Coord	mike.watkins@clorox.com	479-246-6331		479-366-1862	1700 N 13th St
Kennametal Inc	10-KMT	Tim	Bair	EHS Mngr	tim.bair@kennametal.com	479-636-1515	4726	479-531-4611	205 N 13th St
MAFCO	13-MFC	Roger	Johansen	General Mngr	rjohansen.mafco@sbcglobal.net	479-631-0404			1203 N 6th St
Ozark Mountain Poultry	13-OMP	Tommy	Lewis	Maint Mngr	tlewis@ompfoods.com	479-633-8600	4264	479-644-0003	750 West Easy St
Pel-Freez Arkansas	13-PFM	Brenda	Price	Product Mngr	bcrenshaw@pel-freez.com	479-636-4361	328	479-256-0184	219 N Arkansas St
Preformed Line Products	13-PLP	Steve	Renfro	Sr Ind Engr	srenfro@preformed.com	479-636-7600	309	479-387-8875	2740 S 1st St
Southeast Poultry	13-SEP	Joel	Judd	Facility Maint Super	jjudd@southeastpoultry.com	479-636-3600	234	479-372-7169	2200 Town West Dr
Southeast Poultry	13-SEP	Michelle	Rufino	QA Mngr	mrufino@southeastpoultry.com	479-636-3600	225	479-419-8805	2200 Town West Dr
Tyson Chick-N-Quick	13-TCQ.2.1	Jay	Lor	Complex Envir Mngr	jay.lor@tyson.com	479-986-3216		479-227-0088	400 W Olrich St
Tyson Chick-N-Quick	13-TCQ.2.1	Randy	Moore	WW Mngr	Randy.moore@tyson.com	479-636-7251	152	479-684-1861	400 W Olrich St
Tyson of Rogers	13-TOR.2	Mark	Dooly	Complex Envir Mngr	mark.dooly@tyson.com	479-290-6404		479-713-0515	212 E Elm St
Tyson of Rogers	13-TOR.2	Wylie	Luther	WW&Envir Mngr	wylie.luther@tyson.com	479-636-1620	118	479-957-1853	212 E Elm St
WestRock	15-RKT.2	Brian	Blackstock	Safety & Envir Mngr	brian.blackstock@westrock.com	479-899-0226		501-314-9042	212 E Elm St

Updated 01/15/2016 by: Paul Burns