

From: [Yates, Adam](#)
To: [Paul Burns](#)
Cc: [Earl Rausch](#); [Todd Beaver](#); [Cary Roth](#); [Burrow, Kealey](#); [McWilliams, Carrie](#); [Healey, Richard](#); [Anderson, Alan](#)
Subject: RE: 2017 ANNUAL PRETREATMENT PROGRAM STATUS REPORT for Rogers AR
Date: Tuesday, February 06, 2018 12:41:25 PM
Attachments: [AR0043397_Rogers Jan 2018 Pretreatment Program Annual Report_20180126.pdf](#)

Paul,

City of Rogers' January 2018 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 CFR 403.12(i).

Thank you for your timely submittal. If you have any questions or concerns, please feel free to contact me.

Kindly,

Adam Yates
State Pretreatment Coordinator
Office of Water Quality
Arkansas Department of Environmental Quality
Phone: (501) 682-0617
Fax: (501) 682-0880

G:\Shared Folders\Water\Pretreatment\Reports

From: Paul Burns [mailto:PaulBurns@RWU.ORG]
Sent: Friday, January 26, 2018 10:16 AM
To: Yates, Adam
Cc: Earl Rausch; Todd Beaver; Cary Roth
Subject: 2017 ANNUAL PRETREATMENT PROGRAM STATUS REPORT for Rogers AR

Hello Adam,

Please review the attached 2017 Annual Pretreatment Program Status Report for Rogers AR. This should meet the NPDES Permit requirement to submit this report each year during the month of January.

Please let me know if you have any questions or comments.

Take care,

Paul Burns
Pretreatment Coordinator
ROGERS POLLUTION CONTROL FACILITY
ROGERS WATER UTILITIES
479-273-7378 x306 work
479-276-1942 mobile

ANNUAL PRETREATMENT PROGRAM STATUS REPORT

for the

CITY OF ROGERS, ARKANSAS

January 2017 - December 2017

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 23rd, 2018
Reporting Period: January 2017 – December 2017
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.

 1-23-18

Earl Rausch
Utility Superintendent
Rogers Water Utilities

Date

**II. A. MONITORING RESULTS TABLE III POLLUTANTS
REPORTING YEAR: JANUARY 2017 TO DECEMBER 2017**

TREATMENT PLANT: City of Rogers, Rogers Pollution Control Facility
AVERAGE POTW FLOW in MGD: L001 = 7.976, L002 = 1.209, TOTAL = 9.185

NPDES PERMIT NO. AR0043397

% SIU FLOW: 9.45% % I&I FLOW: 18.1%

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			
			02/27-28	05/08-09	09/12-13	11/28-29		02/28-03/01	05/09-10	09/13-14	11/29-30
Antimony	µg/L	na	< 2.0	< 1.0	4.2	< 1.0	na	< 0.40	0.36	0.64	< 0.20
Arsenic	µg/L	25.0	< 1.0	< 1.0	1.3	< 1.0	504	0.32	0.26	0.44	0.20
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	2.8	< 1.0	< 1.0	< 1.0	10.30	< 0.20	< 0.20	< 0.20	< 0.20
Chromium	µg/L	528	2.4	1.6	3.6	6.0	1847	< 0.20	< 0.20	0.24	0.34
Copper	µg/L	678	20.2	16.4	29.8	22.2	60.5	1.96	1.16	< 0.80	0.64
Lead	µg/L	71.0	< 1.0	< 1.0	1.6	< 1.0	27.6	0.36	0.20	0.32	0.28
Mercury	µg/L	0.8038	0.0441	0.0158	0.0507	0.0490	0.0167	0.00291	0.00099	0.00275	0.00134
Molybdenum	µg/L	53.0	1.6	1.3	5.2	1.5	na	1.00	0.82	1.26	1.08
Nickel	µg/L	19.0	5.0	3.2	4.7	3.6	621	2.14	1.46	1.62	1.40
Selenium	µg/L	16.0	< 2.0	< 2.0	< 2.0	< 1.0	8.28	< 0.40	< 0.40	0.40	0.22
Silver	µg/L	100	< 1.0	< 1.0	3.2	< 1.0	25.0	< 0.20	< 0.20	0.32	< 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	115	103	106	132	460	37.1	< 20	38.7	39.8
Cyanide	µg/L	27.0	< 10	< 10	< 10	< 10	8.5	< 10	< 10	< 10	< 10
Phenols	µg/L	na	60	30	50	43	na	< 5	< 5	< 5	< 5
			Loading in lb/day					Loading in lb/day			
Antimony	lb/day	na	< 0.118	< 0.079	0.292	< 0.060	na	< 0.023	0.027	0.044	< 0.020
Arsenic	lb/day	1.916	< 0.059	< 0.079	0.091	< 0.060	38.6	0.019	0.020	0.030	0.020
Beryllium	lb/day	na	< 0.059	< 0.079	< 0.070	< 0.060	na	< 0.012	< 0.015	< 0.014	< 0.020
Cadmium	lb/day	1.456	0.166	< 0.079	< 0.070	< 0.060	0.790	< 0.012	< 0.015	< 0.014	< 0.020
Chromium	lb/day	40.47	0.142	0.127	0.251	0.361	142	< 0.012	< 0.015	0.016	0.035
Copper	lb/day	51.97	1.195	1.299	2.075	1.335	4.64	0.114	0.088	< 0.054	0.066
Lead	lb/day	5.442	< 0.059	< 0.079	0.111	< 0.060	2.12	0.021	0.015	0.022	0.029
Mercury	lb/day	0.062	0.0026	0.0013	0.0035	0.0029	0.00128	0.0002	0.0001	0.0002	0.0001
Molybdenum	lb/day	4.063	0.095	0.103	0.362	0.090	na	0.058	0.062	0.086	0.111
Nickel	lb/day	1.456	0.296	0.254	0.327	0.217	47.601	0.124	0.111	0.110	0.143
Selenium	lb/day	1.226	< 0.118	< 0.158	< 0.139	< 0.060	0.634	< 0.023	< 0.030	0.027	0.023
Silver	lb/day	7.665	< 0.059	< 0.079	0.223	< 0.060	1.915	< 0.012	< 0.015	0.022	< 0.020
Thallium	lb/day	na	< 0.059	< 0.079	< 0.070	< 0.060	na	< 0.012	< 0.015	< 0.014	< 0.020
Zinc	lb/day	38.33	6.804	8.160	7.381	7.940	35.2	2.157	< 1.524	2.634	4.079
Cyanide	lb/day	2.070	< 0.592	< 0.792	< 0.696	< 0.601	0.651	< 0.581	< 0.762	< 0.681	< 1.025
Phenols	lb/day	na	3.550	2.377	3.482	2.586	na	< 0.291	< 0.381	< 0.340	< 0.512
Flow	MGD	INF	7.094	9.499	8.349	7.212	EFF	6.970	9.136	8.162	12.288

Laboratory Analysis 2017		
EPA Method	Lab PQL µg/L	EPA MQL µg/L
200.8	0.40	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	0.00050	0.005
200.8	0.20	na
200.8	0.20	0.5
200.8	0.40	5
200.8	0.20	0.5
200.8	0.20	0.5
4500-CN f	10	10
420.1	5	5

PQL's based on effluent samples which are usually diluted 2X prior to analysis (10X for 2nd Quarter); 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 = 9.185 MGD.

II. C. RPCF 2017 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 ₃	Volatiles	<0.010	0.00985	0.010

Base/Neutral and Acid all not detected for Influent or Effluent

VOC and Pest/PCB all not detected for Influent or Effluent except for Chloroform above

Influent Grab Samples for VOC, BNA and Pest/PCB collected 02/27/17

Effluent Grab Samples for VOC, BNA and Pest/PCB collected 02/28/17

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
 2017 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	01/01/18	N	1	15	N/A	N/A	C	C	C
Glad Manufacturing	2671, 2673	326111	N/A	Y	01/01/18	N	1	12	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
Ozark Mt. Poultry	2015	311615	432.126 ^A	Y	01/01/18	N	1	27	N/A	N/A	C	C	C
Pel-Freez Arkansas	2015	311611	432.54 ^A	Y	01/01/17	N	1	06	N/A	N/A	C	C	C
Preformed Line Products	3644	335932	467.55	Y	01/01/18	N	1	21	N/A	N/A	C	C	C
Southeast Poultry	2015	311615	432.126 ^A	Y	01/01/18	N	1	46	N/A	N/A	C	C	C
Tyson C-N-Q	2015	311615	432.124 ^A	Y	01/01/18	N	1	51	N/A	N/A	C	C	C
Tyson of Rogers	2015	311615	432.124 ^A	Y	01/01/18	N	1	39	N/A	N/A	C	C	C
WestRock	2653	322211	N/A	Y	08/01/15	N	1	13	N/A	N/A	C	C	C

^A Non-point, only required to comply with 40 CFR 403

IV. Attachment B
2017 SIGNIFICANT NON-COMPLIANT (SNC) - ENFORCEMENT ACTIONS TAKEN

SIU	Nature of Violation		NUMBER OF ACTIONS TAKEN					Penalties Collected	Compliance Schedule		Current Status	Comments
									Date Issued	Date Due		
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other					
Southeast Poultry				Yes				\$1000	2/8/2017	12/15/2018	Compliant	Based on CBOD5 violations from 2016. Compliant with Permit limits throughout 2017.

Note: AO issued to Southeast Poultry (SEP) required pretreatment upgrades which were completed by the due date, 12/15/17. SEP is now in the final post construction testing and optimization phase of the AO and is meeting all permit requirements.

a. Daily Maximum Concentration	e. TRC Daily Maximum Concentration	i. Low pH	m. Failure to monitor 1 or more permit parameters
b. Daily Maximum Loading	f. TRC Daily Maximum Loading	j. High pH	n. Discharge of sewage or polluted waters into natural outlets
c. Monthly Average Concentration	g. TRC Monthly Average Concentration	k. Late Reports	o. Failure to notify of an operational upset(s) within 24 hours
d. Monthly Average Loading	h. TRC Monthly Average Loading	l. Monitoring Frequency	p. Failure to properly maintain and operate pretreatment

Comments:

V. Attachment C

2017 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, 2017 through December 31, 2017</u>		
Total Number of Categorical IUs	<u>3</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>3 / 3</u>	<u>7 / 7</u>
4) No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule	<u>0 / 0</u>	<u>1 / 1</u>
5) No. of SIUs in Significant Noncompliance/ Total No. of SIUs	<u>0 / 3</u>	<u>0 / 7</u>
6) Rate of Significant Noncompliance for all SIUs (Categorical and Non-Categorical)	<u>0 / 10</u>	

C. Compliance Monitoring Program

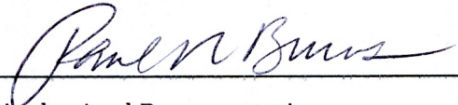
	Significant Industrial Users	
	<u>Categorical</u>	<u>Non-Categorical</u>
1) No. of Control Documents Issued/ Total No. Required	<u>3/3</u>	<u>7/7</u>
2) No. of Non-sampling Inspections Conducted	<u>3</u>	<u>7</u>
3) No. of Sampling Visits Conducted	<u>3</u>	<u>18</u>
4) No. of Facilities Inspected (non-sampling)	<u>3</u>	<u>7</u>
5) No. of Facilities Sampled	<u>3</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>1</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>\$1000 / 1</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.

 01/23/2018
 Authorized Representative Date

VI. Significant Violator Newspaper Publication

There were no significant violators for 2017.

VII. Pretreatment Program SIU Flows

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.

SIU Monthly Total Process Discharge Flow - MGD

Month	Bekaert	Glad	Kennametal	Ozark Mt	Pel-Freez	Preformed	SE Poultry	Tyson CnQ	Tyson Rog	W Rock
1/1/2017	0.641395	0.562727	0.533398	2.237869	0.241295	0.025500	1.666844	11.51368	4.751430	0.039610
2/1/2017	0.592870	0.485000	0.431077	2.015617	0.208110	0.029700	1.490737	10.50047	4.787650	0.048893
3/1/2017	0.740217	0.625877	0.408006	2.435248	0.145957	0.028300	1.659992	10.50047	5.608910	0.037345
4/1/2017	0.682280	0.810136	0.472949	2.231008	0.163854	0.022000	1.798416	10.57752	5.635123	0.051253
5/1/2017	0.715829	0.756685	0.537299	2.270839	0.302758	0.030400	1.759968	9.85448	5.946746	0.051600
6/1/2017	0.856293	0.725603	0.668616	2.350000	0.477167	0.022000	1.798814	9.75503	5.240046	0.049900
7/1/2017	0.754382	0.725603	0.725915	2.360019	0.385722	0.030400	1.860744	10.18539	4.633876	0.049600
8/1/2017	0.695095	1.079287	0.890978	2.559508	0.430131	0.023800	1.846800	10.70292	5.031953	0.039610
9/1/2017	0.640521	0.736816	0.556686	2.113495	0.396022	0.024100	1.607453	9.81428	3.847628	0.039610
10/1/2017	0.643444	0.797811	0.483094	2.354464	0.418516	0.030400	1.725396	11.35047	4.255838	0.058800
11/1/2017	0.700228	0.553223	0.306554	2.178734	0.381449	0.024800	1.607250	9.21157	4.037556	0.052000
12/1/2017	0.581633	0.497505	0.285221	2.188231	0.295840	0.026200	1.479985	8.06673	3.950659	0.053700
Sum	8.244187	8.356273	6.299793	27.295032	3.846821	0.317600	20.302399	122.033	57.727415	0.571921
Average	0.687016	0.696356	0.524983	2.274586	0.320568	0.026467	1.691867	10.169	4.810618	0.047660
Daily (M thru F)	0.022901	0.023212	0.020192	0.094774	0.022898	0.001393	0.073559	0.406777	0.200442	0.002166
Days/Month	30	30	26	24	14	19	23	25	24	22
% of total	2.6%	2.7%	2.3%	10.9%	2.6%	0.16%	8.5%	46.8%	23.1%	0.25%
RPCF average flow Sun thru Sat				9.185000						
Daily SIU Flow Monday thru Friday				0.868314						
Percent of RPCF Flow				9.45%						

The sum daily SIU's flow is 0.868314 which is an increase over last years sum of 0.818101 million gallons per day (MGD).

VIII. City of Rogers Industrial Pretreatment Contacts

Company	Permit #	First Name	Last Name	Job Title	E-mail Address	Business Phone	Address
Bekaert Steel	18-BSC	Rodney	Bland	Envir Coord	rodney.bland@bekaert.com	479-631-7661	1 Bekaert Drive
Glad Manufacturing	18-GMC	Mike	Watkins	Envir Coord	mike.watkins@clorox.com	479-246-6331	1700 N 13th St
Kennametal Inc	14-KMT	Tim	Bair	EHS Mngr	tim.bair@kennametal.com	479-636-1515	205 N 13th St
Ozark Mountain Poultry	18-OMP	Tommy	Lewis	Maint Mngr	tlewis@ompfoods.com	479-633-8600	750 West Easy St
Pel-Freez Arkansas	17-PFA	Theresa	Kwasny	Quality Mngr	tkwasny@pel-freez.com	479-636-4361	219 N Arkansas St
Preformed Line Products	18-PLP	Lloyd	Brown	Lead Assessor/ Compliance Tech	srenfro@preformed.com	479-636-7600	2740 S 1st St
Southeast Poultry	18-SEP	Joseph	Nuckols	Plant Mngr	jnuckols@southeastpoultry.com	479-636-3600	2200 Town West Dr
Tyson Chick-N-Quick	18-TCQ	Jay	Lor	Complex Envir Mngr	jay.lor@tyson.com	479-986-3216	400 W Olrich St
Tyson Chick-N-Quick	18-TCQ	Randy	Moore	WW Mngr	Randy.moore@tyson.com	479-636-7251	400 W Olrich St
Tyson of Rogers	18-TOR	Josh	Crittenden	Complex Envir Mngr	Josh.crittenden@tyson.com	479-290-8568	212 E Elm St
Tyson of Rogers	18-TOR	Wylie	Luther	WW&Envir Mngr	wylie.luther@tyson.com	479-636-1620	212 E Elm St
WestRock	15-RKT.2	Josh	Conway	Maint Super	Josh.conway@westrock.com	479-899-0206	2021 S 5 th St

Updated 01/17/2018 by: Paul Burns