

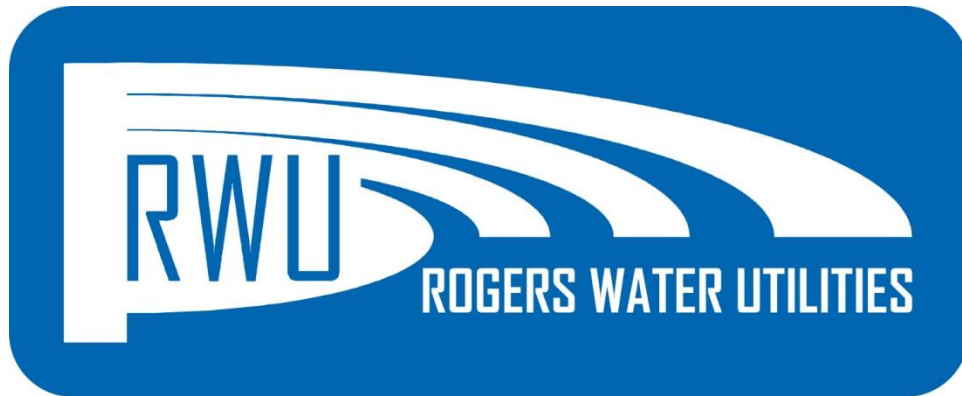
ANNUAL PRETREATMENT PROGRAM STATUS REPORT

for the

CITY OF ROGERS, ARKANSAS

January 2018 - December 2018

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 15th, 2019
Reporting Period: January 2018 – December 2018
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

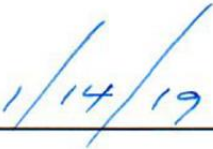
For further information concerning this report contact:

Paul Burns
Pretreatment Coordinator
4300 Rainbow Road
Rogers, AR 72758-1440
479-273-7378 x304
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.



Brent Dobler
Utilities Superintendent
Rogers Water Utilities



Date

II. A. MONITORING RESULTS TABLE III POLLUTANTS REPORTING YEAR: JANUARY 2018 TO DECEMBER 2018

TREATMENT PLANT: City of Rogers, Rogers Pollution Control Facility
AVERAGE POTW FLOW in MGD: L001 = 7.173, L002 = 1.489, TOTAL = 8.662

NPDES PERMIT NO. AR0043397
% SIU FLOW: 9.60%

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			
			03/13-14	06/05-06	08/07-08	11/27-28		03/14-15	06/06-07	08/08-09	11/28-29
Antimony	µg/L	na	< 1.0	< 2.1	< 2.1	< 2.1	na	0.22	< 2.1	< 2.1	< 2.1
Arsenic	µg/L	25.0	< 1.0	0.42	0.59	0.56	504	< 0.20	< 0.26	0.32	0.31
Beryllium	µg/L	na	< 1.0	< 0.26	< 0.26	< 0.26	na	< 0.20	< 0.26	< 0.26	< 0.26
Cadmium	µg/L	19.0	< 1.0	< 0.26	< 0.26	< 0.26	10.30	< 0.20	< 0.26	< 0.26	< 0.26
Chromium	µg/L	528	2.5	4.5	1.7	2.1	1847	< 0.20	< 0.26	< 0.26	0.63
Copper	µg/L	678	15.7	22.3	23.8	28.6	60.5	1.16	0.77	0.70	1.12
Lead	µg/L	71.0	< 1.0	0.81	0.79	0.59	27.6	< 0.20	< 0.26	< 0.26	< 0.26
Mercury	µg/L	0.8038	0.1740	0.1010	0.1760	0.0878	0.0167	0.00292	0.00198	0.00250	0.00485
Molybdenum	µg/L	53.0	2.7	1.4	2.0	1.5	na	1.1	1.36	1.09	1.00
Nickel	µg/L	19.0	2.6	4.2	3.7	3.29	621	1.38	1.60	1.62	1.52
Selenium	µg/L	16.0	< 1.0	< 2.1	< 2.1	< 2.1	8.28	0.52	< 2.1	< 2.1	< 2.1
Silver	µg/L	100	< 1.0	< 0.26	< 0.26	< 0.26	25.0	< 0.20	< 0.26	< 0.26	< 0.26
Thallium	µg/L	na	< 1.0	< 0.26	< 0.26	< 0.26	na	< 0.20	< 0.26	< 0.26	< 0.26
Zinc	µg/L	500	136	126	144	155	460	26.9	32	38.3	71.3
Cyanide	µg/L	27.0	< 10	< 10	< 10	< 10	8.5	< 10	< 10	< 10	< 10
Phenols	µg/L	na	29	62	96	46	na	< 5	< 6.2	< 5	< 5
			Loading in lb/day					Loading in lb/day			
Antimony	lb/day	na	< 0.078	< 0.135	< 0.126	< 0.128	na	0.016	< 0.138	< 0.131	< 0.131
Arsenic	lb/day	1.807	< 0.078	0.027	0.035	0.034	36.4	< 0.015	< 0.017	0.020	0.019
Beryllium	lb/day	na	< 0.078	< 0.017	< 0.016	< 0.016	na	< 0.015	< 0.017	< 0.016	< 0.016
Cadmium	lb/day	1.373	< 0.078	< 0.017	< 0.016	< 0.016	0.745	< 0.015	< 0.017	< 0.016	< 0.016
Chromium	lb/day	38.17	0.196	0.289	0.102	0.128	134	< 0.015	< 0.017	< 0.016	0.039
Copper	lb/day	49.01	1.228	1.437	1.428	1.746	4.37	0.085	0.050	0.044	0.070
Lead	lb/day	5.132	< 0.078	0.052	0.047	0.036	2.00	< 0.015	< 0.017	< 0.016	< 0.016
Mercury	lb/day	0.0581	0.0136	0.0065	0.0106	0.0054	0.00121	0.0002	0.0001	0.0002	0.0003
Molybdenum	lb/day	3.831	0.211	0.092	0.120	0.092	na	0.081	0.089	0.068	0.062
Nickel	lb/day	1.373	0.203	0.271	0.222	0.201	44.891	0.102	0.105	0.101	0.095
Selenium	lb/day	1.157	< 0.078	< 0.134	< 0.126	< 0.128	0.598	0.038	< 0.138	< 0.131	< 0.131
Silver	lb/day	7.229	< 0.078	< 0.017	< 0.016	< 0.016	1.806	< 0.015	< 0.017	< 0.016	< 0.016
Thallium	lb/day	na	< 0.078	< 0.017	< 0.016	< 0.016	na	< 0.015	< 0.017	< 0.016	< 0.016
Zinc	lb/day	36.14	10.637	8.122	8.642	9.460	33.2	1.982	2.065	2.393	4.465
Cyanide	lb/day	1.952	< 0.782	< 0.645	< 0.600	< 0.610	0.614	< 0.737	< 0.656	< 0.625	< 0.626
Phenols	lb/day	na	2.268	3.997	5.761	2.807	na	< 0.368	< 0.406	< 0.312	< 0.313
Flow	MGD	INF	9.378	7.729	7.196	7.318	EFF	8.834	7.860	7.493	7.508

Laboratory Analysis 2018		
EPA Method	Lab PQL µg/L	EPA MQL µg/L
200.8	2.1	60
200.8	0.26	0.5
200.8	0.26	0.5
200.8	0.26	0.5
200.8	0.26	10.0
200.8	0.26	0.5
200.8	0.26	0.5
1631	0.00050	0.005
200.8	0.60	na
200.8	0.26	0.5
200.8	2.1	5
200.8	0.26	0.5
200.8	0.26	0.5
200.8	20.0	20
4500CN BE	10	10
420.1	5	5

PQL's changed after 1st Quarter due to changing contract labs.

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 = 8.662 MGD.

II. C. RPCF 2018 Priority Pollutant Scan - 40 CFR 122 Appendix D Table II

Name	CAS No.	Molecular Formula	Type	Influent mg/L	Effluent mg/L	Req MQL
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Base/Neutral and Acid all not detected for Influent or Effluent

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

Influent Grab Samples for VOC, BNA and Pest/PCB collected 06/05/18

Effluent Grab Samples for VOC, BNA and Pest/PCB collected 06/06/18

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
 2018 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	13	N/A	N/A	C	C	C
Glad Manufacturing	2671, 2673	326111	N/A	Y	01/01/18	N	1	9	N/A	N/A	C	C	C
Kennametal	3545	333515	471.54	Y	01/01/19	N	1	14	N/A	N/A	C	C	C
Ozark Mt. Poultry	2015	311615	432.126 ^A	Y	01/01/18	N	1	36	N/A	N/A	C	C	C
Pel-Freez Arkansas	2015	311611	432.54 ^A	Y	01/01/17	N	1	05	N/A	N/A	C	C	C
Preformed Line Products	3644	335932	467.55	Y	01/01/18	N	1	20	N/A	N/A	C	NC*	C
Southeast Poultry	2015	311615	432.126 ^A	Y	01/01/18	N	1	44	N/A	N/A	C	C	C
Tyson C-N-Q	2015	311615	432.124 ^A	Y	01/01/18	N	1	49	N/A	N/A	C	C	C
Tyson of Rogers	2015	311615	432.124 ^A	Y	01/01/18	N	1	37	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	NC**

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

* Failed to sample for cyanide during 1st half of year and issued an NOV

** Over monthly average CBOD concentration limit for the May 2018 monitoring period

Attachment B
2018 SIGNIFICANT NON-COMPLIANT (SNC) - ENFORCEMENT ACTIONS TAKEN

SIU	Nature of Violation		NUMBER OF ACTIONS TAKEN					Penalties Collected	Compliance Schedule		Current Status	Comments
			Reports	Limits	N.O.V.	A.O.	Civil		Criminal	Other		
Southeast Poultry											Compliant	User was under A.O. from February 2017 until June 2018

Note: AO issued to Southeast Poultry (SEP) required pretreatment upgrades which were completed by the due date, 12/15/17. SEP was in the final post construction testing and optimization phase of the AO until June 2018. SEP was compliant with the A.O. and Permit requirements all throughout 2018.

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:

IV. Attachment C

2018 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 City of Rogers

Address 4300 Rainbow Road

City Rogers State / Zip Arkansas 72758-1440

Contact Person Paul N. Burns, Pretreatment Coordinator

Contact Telephone (479) 273-7378 x306

NPDES Permit No. AR0043397

Reporting Period January 1, 2018 through December 31, 2018

Total Number of Categorical IUs 3

Total Number of Significant Non-categorical IUs 7

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	
	Categorical	Non-Categorical
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>14</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	
	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>1</u>	<u>1</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 M Burns
Authorized Representative

1/15/19
Date

Significant Violator Newspaper Publication

There were no significant violators for 2018.

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. The flows are list as million gallons (MG).

SIU Monthly Total Process Discharge Flow 2018

Month	Bekaert	Glad	Kennametal	Ozark Mt	Pel-Freez	Preformed	SE Poultry	Tyson CnQ	Tyson Rog	W Rock
1/1/2018	0.597529	0.571623	0.250712	2.463634	0.314881	0.026200	1.672110	9.891310	3.907427	0.053900
2/1/2018	0.458449	0.550739	0.271365	2.154369	0.191970	0.031800	1.446918	8.968920	3.672448	0.031600
3/1/2018	0.695543	0.578716	0.440965	2.498522	0.177850	0.029700	1.666126	9.947410	3.767497	0.044300
4/1/2018	0.644423	0.567480	0.423168	2.469273	0.184558	0.031100	1.500076	9.272380	4.112955	0.049000
5/1/2018	0.670556	0.839000	0.438671	2.834697	0.259253	0.030400	1.765362	9.440880	5.113191	0.060200
6/1/2018	0.718505	0.858993	0.529617	2.692290	0.256075	0.032500	1.880202	9.304550	4.654740	0.052500
7/1/2018	0.628888	1.068620	0.413305	2.704562	0.295738	0.031100	1.871983	9.324310	5.454700	0.047000
8/1/2018	0.695595	1.183803	0.416809	3.025774	0.380023	0.036000	1.949726	10.384390	5.684880	0.072000
9/1/2018	0.586547	0.905643	0.389019	2.426752	0.301131	0.033200	1.621411	8.585740	5.125040	0.047500
10/1/2018	0.594913	0.842806	0.420356	2.594241	0.354548	0.029000	1.513178	9.884140	5.483810	0.067500
11/1/2018	0.448062	0.661764	0.476689	2.436508	0.257068	0.034600	1.489177	8.100870	4.526838	0.053000
12/1/2018	0.545512	0.682268	0.401609	2.281450	0.282799	0.025500	1.453267	8.971150	4.069856	0.040700
Sum	7.284522	9.311455	4.872285	30.582072	3.255894	0.371100	19.829536	122.033	55.573382	0.619200
Average	0.607044	0.775955	0.406024	2.548506	0.271325	0.030925	1.652461	9.340	4.631115	0.051600
Daily (M thru F)	0.020235	0.025865	0.015616	0.106188	0.020871	0.001628	0.071846	0.373587	0.192963	0.002345
Days/Month	30	30	26	24	14	19	23	25	24	22

RPCF average flow Sun thru Sat 8.662000
 Daily SIU Flow Monday thru Friday 0.831144

Percent of RPCF Flow 9.60%

The sum daily SIU's flow is estimated at 0.831144 MG which is down from 0.868314 MG last year.

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	19-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	lbrown@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	Drew	Hoppe	Safety Manager	Drew.hoppe@westrock.com	479-899-0226	2021 S 5 th St

Updated 01/11/2019 by: Paul Burns