

Re: Rogers AR 2020 Pretreatment Program Annual Status Report

Yates, Adam

Wed 5/12/2021 3:34 PM

To: Paul Burns <paulburns@RWU.ORG>;

Cc: Brent Dobler <brentdobler@RWU.ORG>; Todd Beaver <toddbeaver@RWU.ORG>; David Staib <davidstaib@RWU.ORG>; Patrick Pruitt <patrickpruitt@RWU.ORG>; Amber Underwood <amberunderwood@RWU.ORG>; McWilliams, Carrie <mcwilliamsc2@adeq.state.ar.us>; Healey, Richard <HEALEYR@adeq.state.ar.us>; Ramsey, David <RAMSEY@adeq.state.ar.us>; Allen-Daniel, Leslie <ALLEN-DANIEL@adeq.state.ar.us>; Brown, Christina <christina.brown@adeq.state.ar.us>;

Paul,

City of Rogers' Jan 2021 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 on this matter, please feel free to contact me.

Kindly,

Adam Yates | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
5301 Northshore Drive | North Little Rock, AR 72118
t: (501) 682-0617 | e: yates@adeq.state.ar.us

From: Paul Burns <paulburns@RWU.ORG>
Sent: Tuesday, January 26, 2021 2:56 PM
To: Yates, Adam
Cc: Brent Dobler; Todd Beaver; David Staib; Patrick Pruitt; Amber Underwood
Subject: Rogers AR 2020 Pretreatment Program Annual Status Report

Hello Adam,

I am writing you to submit the 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 view the attached 2020 report.

If you have any questions or comments please let me know.

Kind regards,

Paul Burns | *Pretreatment Coordinator*
Rogers Water Utilities | www.rwu.org
Pollution Control Facility
4300 Rainbow Road, Rogers, AR 72758
479-273-7378 x306



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ANNUAL PRETREATMENT PROGRAM STATUS REPORT

for the

CITY OF ROGERS, ARKANSAS

January 2020 - December 2020

Permit No. AR0043397



Submitted to

Arkansas Energy & Environment

Department of Environmental Quality

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I. Certification

NPDES Permit Holder: City of Rogers
Report Date: January 26th, 2021
Reporting Period: January 2020 – December 2020
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

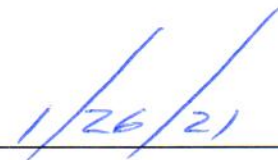
For further information concerning this report contact:

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.



Brent Dobler
Utilities Superintendent
Rogers Water Utilities



Date

II. A. MONITORING RESULTS TABLE III POLLUTANTS CALENDAR YEAR 2020
AVERAGE POTW FLOW in MGD: L001 = 8.574, L002 = 1.094, TOTAL = 9.668 % SIU FLOW = 8.42

METALS, CYANIDE & PHENOLS	Units	MAHC µg/L	Influent Mar 25-26	Influent June 17-18	Influent Aug 18-19	Influent Oct 19-20	WQ Lvl Limit µg/L	Effluent Mar 26-27	Effluent June 18-19	Effluent Aug 19-20	Effluent Oct 20-21
Antimony	µg/L	na	<2.08	<2.08	<2.08	<2.08	na	<2.08	<2.08	<2.08	<2.08
Arsenic	µg/L	25.0	0.53	0.50	0.41	0.60	504	0.38	<0.26	<0.26	0.35
Beryllium	µg/L	na	<0.26	<0.26	<0.26	<0.26	na	<0.26	<0.26	<0.26	<0.26
Cadmium	µg/L	19.0	<0.26	<0.26	<0.26	<0.26	10.30	<0.26	<0.26	<0.26	<0.26
Chromium	µg/L	528	1.22	1.50	0.99	2.10	1847	0.44	0.50	0.96	0.41
Copper	µg/L	678	13.1	32.0	15.9	19.8	60.5	1.00	1.16	1.22	0.90
Lead	µg/L	71.0	0.56	0.71	0.65	0.92	27.6	<0.26	<0.26	<0.26	<0.26
Mercury	µg/L	0.8038	0.0992	0.0608	0.0587	0.0180	0.01670	0.00735	0.00112	0.00326	<0.00051
Molybdenum	µg/L	53.0	1.24	2.68	<0.60	1.74	na	0.89	1.33	<0.60	0.91
Nickel	µg/L	19.0	2.92	4.04	3.78	4.33	621	1.55	1.69	2.12	2.10
Selenium	µg/L	16.0	<2.08	<2.08	<2.08	<2.08	8.28	<2.08	<2.08	<2.08	<2.08
Silver	µg/L	100	<0.26	<0.26	<0.26	<0.26	25.0	<0.26	<0.26	<0.26	<0.26
Thallium	µg/L	na	<0.26	<0.26	<0.26	<0.26	na	<0.26	<0.26	<0.26	<0.26
Zinc	µg/L	500	71.0	159	90.6	93.9	460	24.0	38.1	24.2	31.1
Cyanide	µg/L	27.0	<10	<10	<10	<10	8.5	<10	<10	<10	<10
Phenols	µg/L	na	30.6	77.3	40.4	43.9	na	7.0	<5.0	<5.0	<5.0

Laboratory Analysis 2020		
EPA Method	Lab PQL µg/L	EPA MQL µg/L
200.8	2.08	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	0.600	na
200.8	0.26	0.5
200.8	2.08	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

Antimony	lb/day	na	0.272	0.149	0.132	0.148	na	0.255	0.144	0.135	0.152
Arsenic	lb/day	2.017	0.069	0.036	0.026	0.043	40.7	0.047	0.018	0.017	0.025
Beryllium	lb/day	na	0.034	0.019	0.016	0.018	na	0.032	0.018	0.017	0.019
Cadmium	lb/day	1.533	0.034	0.019	0.016	0.018	0.831	0.032	0.018	0.017	0.019
Chromium	lb/day	42.60	0.160	0.107	0.063	0.149	149	0.054	0.035	0.062	0.030
Copper	lb/day	54.70	1.714	2.288	1.007	1.408	4.88	0.123	0.080	0.079	0.066
Lead	lb/day	5.729	0.073	0.051	0.041	0.065	2.23	0.032	0.018	0.017	0.019
Mercury	lb/day	0.0649	0.0130	0.0043	0.0037	0.0013	0.00135	0.0009	0.0001	0.0002	0.0000
Molybdenum	lb/day	4.276	0.162	0.192	0.038	0.124	na	0.109	0.092	0.039	0.066
Nickel	lb/day	1.533	0.382	0.289	0.239	0.308	50.1	0.190	0.117	0.138	0.153
Selenium	lb/day	1.291	0.272	0.149	0.132	0.148	0.668	0.255	0.144	0.135	0.152
Silver	lb/day	8.068	0.034	0.019	0.016	0.018	2.02	0.032	0.018	0.017	0.019
Thallium	lb/day	na	0.034	0.019	0.016	0.018	na	0.032	0.018	0.017	0.019
Zinc	lb/day	40.34	9.289	11.371	5.736	6.678	37.1	2.946	2.639	1.575	2.266
Cyanide	lb/day	2.178	1.308	0.715	0.633	0.711	0.685	1.227	0.693	0.651	0.728
Phenols	lb/day	na	4.003	5.528	2.558	3.122	na	0.859	0.346	0.326	0.364

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 FPC samples including Hg. Loadings limits for MAHL and WQL calculated using the average yearly sum of L001&L002 flows = 9.668 MGD.

Flow	MGD	INF	15.687	8.575	7.591	8.528	EFF	14.718	8.306	7.806	8.735
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II. C. RPCF 2020 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 06/17/20

Effluent Grab Samples for VOC, BNA and Pest/PCB collected 06/18/20

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
2020 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	5	N/A	N/A	C	C	C
Kennametal	3545	333515	471.54	Y	01/01/19	N	1	13	N/A	N/A	C	C	C
Ozark Mt. Poultry	2015	311615	432.126 ^A	Y	09/01/20	N	1	36	N/A	N/A	C	C	C
Pel-Freez Arkansas	2015	311611	432.54 ^A	Y	01/01/21	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	C	C
Southeast Poultry	2015	311615	432.126 ^A	Y	09/01/20	N	1	36	N/A	N/A	C	C	C
Tyson Chick'N Quick	2015	311615	432.124 ^A	Y	01/01/18	N	1	51	N/A	N/A	C	C	NC ^B
Tyson of Rogers	2015	311615	432.124 ^A	Y	01/01/18	N	1	43	N/A	N/A	C	C	C
WestRock	2653	322211	N/A	Y	01/01/20	N	1	13	N/A	N/A	C	C	C

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

^B January CBOD monthly average lbs/day loading limit violation

Attachment B

2020 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					
Note:												

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

2020 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, 2020 through December 31, 2020

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>0 / 0</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>10</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>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.



Authorized Representative

01/26/2021

Date

Significant Violator Newspaper Publication

There were no significant violators for 2020.

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 2020

Month	Bekaert	Glad	Kennametal	Ozark Mt	Pel-Freez	Preformed	SE Poultry	Tyson CnQ	Tyson Rog	W Rock
January	0.560937	0.733436	0.945272	3.202234	0.264790	0.029000	1.945677	10.560300	4.475726	0.067600
February	0.558860	0.615646	0.769266	2.912121	0.250690	0.026900	1.624404	8.762660	4.152016	0.062400
March	0.609037	0.728773	0.888639	3.589043	0.289665	0.033200	2.025496	8.369985	4.485417	0.062500
April	0.085662	0.783741	0.579103	3.165097	0.299860	0.030400	2.287321	7.801430	4.020484	0.059800
May	0.247045	1.077983	0.449454	3.234412	0.328572	0.036700	2.285165	7.499840	4.036792	0.057200
June	0.426945	0.926554	0.385501	3.302284	0.352956	0.032500	2.432028	7.520540	3.778785	0.062400
July	0.637561	1.169497	0.549054	3.586498	0.436455	0.031800	2.692236	7.862880	4.545719	0.059800
August	0.683724	0.990804	0.660402	3.254334	0.315097	0.031100	3.079925	7.851460	4.511556	0.062400
September	0.730955	0.916893	0.699953	3.376925	0.335511	0.036000	2.912610	6.858100	4.247372	0.062400
October	0.701576	0.980223	0.651979	3.514016	0.289366	0.034600	3.079704	11.365350	4.354940	0.072800
November	0.442982	0.828732	0.688931	2.847574	0.181794	0.025500	2.505030	7.792124	3.716423	0.057200
December	0.399171	0.751817	0.765652	2.791247	0.225202	0.031800	2.865355	6.937580	3.707270	0.062400
Sum	6.084455	10.504099	8.033206	38.775785	3.569958	0.379500	29.734951	99.182249	50.032500	0.748900
Average	0.507038	0.875342	0.669434	3.231315	0.297497	0.031625	2.477913	8.265187	4.169375	0.062408
Daily Avg	0.018280	0.028728	0.021948	0.131332	0.021614	0.001600	0.105424	0.299369	0.181767	0.002600
Days/Month	30	30	30	25	14	20	23	27	23	24

The sum of daily SIU's flows is estimated at 0.814463 MG which is down from 0.878957 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	June	Green	Envir Coord	june.green@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.2	Tommy	Lewis	Maint Mngr	tlewis@ompfoods.com	479-633-8600	750 West Easy St
Pel-Freez Arkansas	21-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.2	Joseph	Nuckols	Plant Mngr	jnuckols@southeastpoultry.com	479-636-3600	2200 Town West Dr
Tyson Chick-N-Quick	18-TCQ	Jay	Lor	Complex Enviro 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	Wylie	Luther	Waste Water & Enviro Mngr	wylie.luther@tyson.com	479-636-1620	212 E Elm St
WestRock	20-WRK	Danielle	Frost	Safety Manager	danielle.frost@westrock.com	479-899-0226	2021 S 5 th St

Updated 01/25/2021 by: Paul Burns