

Peltier, Hannah

From: Gilliam, Allen
Sent: Thursday, January 22, 2015 2:34 PM
To: Paul Burns (PaulBurns@RWU.ORG); Cary Roth
Cc: Fuller, Kim; Peltier, Hannah; Ramsey, David; Anderson, Alan
Subject: AR0043397_Rogers Nov 2014 adequate Audit Response with ADEQ reply_20150122
Attachments: Rogers 2014 IPT Audit Response Final_20150120.pdf

Paul (no paper copy necessary),

Rogers' written response to the deficiency and recommendations from the Department's November 2014 Pretreatment Program Audit was received, reviewed and deemed adequate.

In response to some of your comments this office offers the following caveats:

Required Action #1, "Under 40 CFR 403.8(f)(2)(vi), "[Rogers will] Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14, 2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User."

Regardless if it was the City's decision to require all SIUs to have a Slug Control Plan (SCP), the above reg requirement specifies the City shall conduct the slug potential evaluation. That procedure was the point this office was trying to make regardless of previous Program submittal approval. The City's evaluation should be on file in each of the industry's file not to be discarded after the 3 year recordkeeping requirement. An outside auditor or inspector might be looking specifically for the slug potential evaluation prepared by the City.

Please excuse this office's "blanket" overview during the short site visits conducted during the Audit that "there was no apparent slug discharge potential at each of three sites visited." It is obvious you, as the City's Pretreatment Coordinator, would know the City's industries' processes, chemical storage areas and plumbing schemes in much more detail than this office to identify slug discharge potentials at those identified in your attached response. Hopefully, your slug potential evaluations will identify those potential slug discharges mentioned in your Audit response and the industries have developed slug control plans to mitigate/eliminate them.

Recommended Actions For Improved Implementation #3: This office only gave a sampling of business sectors from which tailored industry surveys could be more specific in their questions. Many more could have been listed. The recommendation did not intend to place a heavy emphasis on business sectors using traditional x-ray (wet chemistry) film processing, but it may surprise you the number of "old guard" x-raying facilities that have not upgraded to digital. Future tailored surveys will provide this information and this office would be very interested in your survey findings for this sector; and

#7: Apologies for not making the recommendation for signatures on inspection forms more clear. Signatures with dates are not required on inspections, but it is suggested just one page of the original inspection (1st page with the industry's previously typed-in basic contact information on it that probably never changes from year-to-year, e.g.?) could have a place reserved on it for that day's inspection date with the City and industry rep's signature on it. This would negate any doubt the City was on-site during that day for an inspection. That original single page could be attached to the final inspection report.

Thank you for your attention to the Audit, its requirement and recommendations. If there are further questions or comments please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

From: Paul Burns [<mailto:PaulBurns@RWU.ORG>]
Sent: Tuesday, January 20, 2015 2:51 PM
To: Gilliam, Allen
Cc: Cary Roth
Subject: Rogers 2014 IPT Audit Response Final

Allen,

I've attached the audit response for your review. Please let me know if you need a paper copy to be mailed to you.

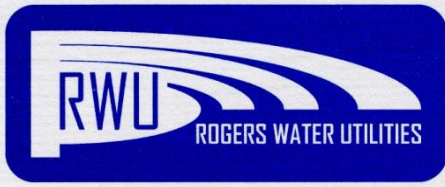
Regards,

Paul Burns
Pretreatment Coordinator

ROGERS WATER UTILITIES

ROGERS POLLUTION CONTROL FACILITY

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



ROGERS POLLUTION CONTROL FACILITY

"Serving Rogers - Protecting Our Environment"

January 20, 2015

Mr. Allen R. Gilliam
State Pretreatment Program Coordinator
Arkansas Department of Environmental Quality
5301 Northshore
North Little Rock, Arkansas 72118-5317

Re: City of Rogers (NPDES #AR0043397; AFIN # 04-00155) Pretreatment Program Audit / Pollution Prevention Assessment Response

Dear Mr. Gilliam,

This letter is in response to the Pretreatment Program Audit / Pollution Prevention Assessment report received December 22nd, 2014. Please review the audit response summary included with this letter that contains comments and corrective actions regarding the audit report's findings and recommendations.

The three days that we spent with you going over the various aspects of our program were very informative. There was simply not enough time for you to perform your audit while also discussing with us a multitude of pretreatment and environmental topics. Your thoroughness and improvement efforts are a great benefit to the City of Rogers' Pretreatment Program.

Sincerely,

A handwritten signature in black ink that reads "Paul N. Burns". The signature is written in a cursive, flowing style.

Paul N. Burns
Pretreatment Coordinator
paulburns@rwu.org

CC: Earl Rausch, Robert Moore, Cary Roth,
File

AUDIT RESPONSE SUMMARY

Here are the comments of the Control Authority and the corrective actions taken to address the findings of a Pretreatment Program Audit conducted by ADEQ on November 4th -6th, 2014.

ADEQ Required Actions

1) Under 40 CFR 403.8(f)(2)(vi), “[Rogers will] Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. For Industrial Users identified as significant prior to November 14,2005, this evaluation must have been conducted at least once by October 14, 2006; additional Significant Industrial Users must be evaluated within 1 year of being designated a Significant Industrial User.”

The procedure that RWU has implemented is to require all SIUs to have a Slug Control Plan (SCP) regardless of whether they have a low or high potential to slug the WWTP. According to the Pretreatment Program Implementation Manual “The City has determined the need for every SIU to have an approved SCP. Each SCP will be reviewed for effectiveness a minimum of once every two years.” It should be noted that this manual has already been deemed sufficient by the Approval Authority (ADEQ). RWU is working on a full revision of the Program Implementation Manual.

All of the SIUs reviewed during the audit have had been permitted with SCPs for over ten years. This office evaluates the SCPs using a comprehensive SCP checklist and by comparing them to permit applications, onsite inspections and/or sampling results.

The auditor has concluded that there was no apparent slug discharge potential at each of three sites visited. The above cited section also states that “a Slug Discharge is any Discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch Discharge, which has a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, local limits or Permit conditions”.

Pel-Freez has a maximum of 2,500 gallons of fresh acetone and 2,500 gallons of waste acetone on site and it is conceivable that a plumbing break or human error could lead to a serious spill to the sewer. For Ozark Mountain and Tyson of Rogers there is the potential that, through poor judgment or operator error, high doses of disinfection chemicals could be released and pass thru their respective pretreatment operations to the WWTP. For example, Tyson of Rogers uses very small amounts of quaternary ammonia and peroxyacetic acid but a spill of the maximum amount on site could have a major impact at the WWTP. The health and safety of anyone pulling manhole lids down sewer would be affected as well. Another example, just a few days ago Southeast Poultry, an SIU very similar to Ozark Mountain, reported accidentally discharging over 150 gallons of food grade oil. They made an attempt to pretreat the waste but still released it to the POTW.

That being said, RWU will modify the Program Implementation Manual to include a Slug Control Plan Evaluation Procedure. It is possible that at least one of the SIUs have such a low slug potential that only an accidental spill prevention plan (ASPP) as a BMP is necessary. However, then there will be the additional administrative burden of determining how often an SIU should be evaluated – to determine if their SCP should be downgraded to an ASPP or their ASPP should be elevated to an SCP.

ADEQ Recommended Actions For Improved Implementation

1) Finishing the City's Pretreatment Program revisions to come into compliance with the Streamlining revisions ...

RWU has completed about 1/3 of the revisions to the pretreatment ordinance. The update to the pretreatment implementation manual is in its initial stages. A new draft of the Enforcement Response Plan has been completed. RWU agrees that aligning our ordinance with that of cities that have recently completed the process is a good idea and appreciates the information that the Approval Authority has forwarded to us. RWU will make finishing the revising of the pretreatment ordinance a major priority for 2015.

2) Including columns on the City's IU survey "master list" (data base) to include "sanitary only" and toxic/incompatible chemicals ...

RWU agrees that it is a good idea to input more information from survey results into the spreadsheet and has added the above mentioned columns.

3) Recommend tailoring IU survey questions to reflect different business sectors' practices...

RWU will work on sector specific surveys as we have done with dentists in the past. It would be a good idea to focus on a specific survey each year. This recommendation places heavy emphasis on business sectors using traditional x-ray film-processing. Non-digital xray is becoming more and more obsolete. If it were even a minor wastewater issue then silver and lead influent levels would be direct evidence of the problem. RWU's WWTP influent results for the past five years show that silver has been less than 1 ppb and lead has been 1.5 ppb. Perhaps this is still a problem in other regions.

4) Recommend including a clear step-by-step narrative describing how the City calculated conventional and non-conventional pollutant limits for applicable industries...

RWU calculated the numbers for the current SIU conventional permit limits in a fairly short time span during the latter half of 2012. The spreadsheet doesn't show each step in an easy to understand manner but all the steps are legitimate. A MAIL is calculated then uniformly distributed to the SIUs that actually discharge domestic level or greater amounts of T-P or CBOD. Each SIU was given a load based on their flow. Then load amounts were then "tweaked" by + or - a few percentage points to shift the allowable load to those SIUs that pollute more.

RWU has already started to revise these spreadsheets and will make sure they include the step-by-step narrative requested above.

5) Recommend rewording or removing "Section C. Specialized Requirements, 1.Phosphorus Reduction" (see Atch. A-31). This clause seems redundant as...

RWU will change the wording to something similar to "whether or not the permittee has effluent T. phosphorus limits, the permittee is encouraged to implement BMPs that would reduce T. phosphorus levels to 10% less than the most recent 12 months moving average. It also recommended that the permittee screen all future chemical and material changes so that 'low T. phosphorus status' can be

maintained". This may be difficult to achieve for some Users since a few of them monitor a combined sanitary and process flow wastestream.

6) Recommend sending the hazardous waste notification requirement per 40 CFR 403.12(p) to all the hazardous waste generators on ADEQ's list (provided during audit).

RWU sent out hazardous waste notification requirement letters in February 2009. We plan on another send out possibly in 2016.

7) Recommend including more narrative on the City's IU inspections regarding chemical handling procedures. How do their virgin chemicals get from ...These inspection forms should also be signed and dated by both the City and industry representative...

RWU has asked all SIUs to provide information about the training, labeling, storage and loading/unloading of chemicals. Each inspection report contains the question "Are employees trained to handle chemicals and hazardous substances?" Also most of the above questions regarding chemical handling are dealt with in their mandatory Slug Control Plans. RWU can add more specific questions to the inspection form.

RWU does not sign the inspection form until it is complete. Sometimes it takes several days or weeks to finally finish a report. An inspection letter is sent to the SIU once the report is complete. Is the purpose of dual signatures some sort of proof that the inspection took place? Do we need to develop an additional carbonless form?

8) Recommend requiring all permitted IUs to submit an updated/detailed wastewater flow schematic...

RWU has a strong relationship with permitted IUs and each Industry contact provides new updates to diagrams and narratives on a regular basis. Some of the schematics reviewed during the audit are in need of some fine tuning. Both this office and the industrial contacts have a firm knowledge of the various waste water generating flows, how the wastewater flows to pretreatment and the monitoring location, and how the pretreatment systems work. RWU will continue to have the industries review and revise schematics.

9) Recommend recycling duplicate file information...

Each permit cycle we remove some of the old files. We will use your recommendation as guidance.

10) Strengthen the Cities' industries understanding of P2. Ozark Mountain...

P2 concepts could be better explained to some IU's. RWU supplied to ADEQ, immediately after the audit, some examples of P2 success stories.

11) Recommend submitting a succinct public announcement to ... educate its citizens...reduce phosphorus...

RWU agrees that educating the public through the newspaper, bill inserts or other media is very important. Some kitchen and bath products continue to contain phosphorus. Another potential avenue for phosphorus reduction is to survey the food service establishments that are part of our FOG program to determine if any of the cleaning chemicals contain phosphorus.

ADEQ Required Program Modifications

1) Streamlining Revisions

As mentioned above, RWU is on track to complete a full draft of the ordinance and pretreatment program implementation manual revisions by the end of this year. A draft of the proposed changes will be submitted to ADEQ before finalizing them.