ADEQ

A R K A N S A S
Department of Environmental Quality

DEC 16 2014

Paul Burns
Pretreatment Coordinator
Rogers Water Utilities
4300 Rainbow Road
Rogers, Arkansas 72758-1440

Re: City of Rogers (NPDES #AR0043397; AFIN # 04-00155) Pretreatment Program Audit / Municipal Pollution Prevention (P2) Assessment

Dear Mr. Burns:

Please find enclosed the finished report for the Audit/Assessment conducted November 4th through November 6th, 2014. The report with required actions and recommendations should be made available for review and discussion by appropriate City representatives. Please respond in writing within 30 days with proposed corrective actions to deficiencies and recommendations found during the Audit.

Rogers' Pretreatment personnel seem very involved and knowledgeable of the National Pretreatment Program, its implementation and enforcement. This auditor was impressed with the professionalism exhibited by Rogers' personnel during the audit and industry site visits.

Rogers has successfully integrated P2 and FOG (fats, oils and grease) aspects into its Pretreatment Program. P2 assessment recommendations are meant to aid your Program to maintain this forward direction. The level of P2 and FOG program activities within the City's Pretreatment Program is lauded.

It was a pleasure and learning experience working with the City's Pretreatment personnel during this event and becoming more familiar with Rogers, its Pretreatment, FOG and Pollution Prevention Programs and industries.

Feel free to contact this office with any questions or concerns at (501) 682-0625.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator

Encl: Audit/Assessment Checklist/Attachments

ec: Rudy Molina/EPA 6WQ-PO
Jason Bolenbaugh/Inspector Supervisor

E/NPDES/NPDES/Pretreatment/Reports

PRETREATMENT PROGRAM AUDIT/

POLLUTION PREVENTION ASSESSMENT

CITY OF ROGERS, ARKANSAS

NPDES PERMIT #AR0043397

December 8, 2014

Prepared by Allen Gilliam

ADEQ State Pretreatment Coordinator

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LIST OF ATTACHMENTS

A) INTRODUCTION

Under ADEQ's responsibility to fulfill its obligations for the administration and enforcement of the NPDES Program, audits of Pretreatment Programs within the state will be part of its coordination and compliance monitoring strategy.

Pollution Prevention (P2) activities, now being strongly recommended to be fully integrated into Pretreatment Programs nationally, an assessment of cities' P2 programs will be made in conjunction with the audits.

An audit/assessment was performed November 4th through November 6th, 2014, of the Pretreatment and Pollution Prevention Programs implemented by the City of Rogers, Arkansas. Participants included:

Allen Gilliam	ADEQ / Pretreatment Coordinator
Paul Burns	City / Pretreatment Coordinator
Cary Roth	City / Environmental Services Coordinator

The goals of the audit/assessment were:

* To determine the implementation and compliance status of the City's Pretreatment Program with the requirements of the General Pretreatment Regulations located in 40 Code of Federal Regulations (CFR) Part 403;

* To determine the effectiveness of the City's Pretreatment and P2 Programs in eliminating the introduction of toxic pollutants from industrial discharges;

* To provide assistance and recommendations to the City that might allow for more effective implementation of program requirements; and

* To assess the level of additional Pollution Prevention activities implemented within the City's day-to-day Pretreatment procedures and make recommendations thereof.

Rogers' Pretreatment Program was originally approved 1/13/84. An ordinance was adopted on 7/9/91, by the City to amend their code with the $1000 penalty provision and was treated as a non-substantial modification.

Another partial modification submittal (4/22/96) included an enforcement response plan and revisions to the pretreatment ordinance. Evaluation of the local limits using current water quality

criteria and EPA modification checklists were not included.

A final/complete modification with the maximum allowable headworks loading was submitted in 2005, reviewed, approved on 11/1/06, then public noticed with no comments received. This modification to their Pretreatment Program was not incorporated into their NPDES permit at that time and needs to be rectified, but modifications to an expired permit is not allowed under 40 CFR 122.

The City's wastewater treatment plant has a design flow of 14 MGD, is treated through fine screens and vortex grit removal; high flow equalization basin capacity; return activated sludge mix with post preliminary treated influent; three - five station trains: fermentation, 1st anoxic, oxic (nitrification basin), 2nd anoxic & reaeration and secondary clarifier for each train; tertiary filtration with sand and anthracite media (traveling bridge); chlorination followed by de-chlorination; effluent passes thru oxygen injection before flowing through a flume to its receiving stream; W.A.S. is dewatered with a centrifuge. The original two trains were upgraded with aerators and other minor mods. The city has highly automated the treatment facility and its collection system monitoring.

A current average effluent flow of 8.13 MGD is discharged to Osage Creek with the capability for a percentage of that to be discharged to a local golf course depending on the season's need. The effluent has demonstrated no toxicity in recent years.

Presently, the POTW receives approximately 0.84 MGD from 12 significant industries, 5 of which are categorical. 1474 dry metric tons of sludge per year were land applied in 2013.

The audit/assessment consisted of informal discussions with the City's Pretreatment personnel, examination of industrial user files, pretreatment records and site visits to three (3) of their industrial users. A checklist was utilized to ensure that all facets of the program were evaluated. A copy of the completed checklist is attached. Supporting information obtained during the audit is included as Attachments A-1 through A-5.

The report is divided into three sections. Section B provides a summary of the significant findings of the audit which will require action by the city of Rogers. Section C includes recommendations to help improve the implementation and enforcement of their Pretreatment and Pollution Prevention Programs. Finally, required program modifications to the City's approved program, including its adopted legal authorities, are outlined in Section D.

B) SUMMARY OF FINDINGS WITH REQUIRED ACTIONS

This section of the report is a summary of deficiencies found in the City of Rogers' Pretreatment Program. Actions required by the City to comply with the current General Pretreatment Regulations (40 CFR 403) and with the approved program, will be paraphrased citations of the

same. A narrative explanation of the finding will follow.

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."

During the file review references were found of "slug discharge potential evaluations", but none could be produced. It should be intuitive that the City's slug discharge potential evaluations, not the industries', should be kept updated and located permanently in the industry's file for future reference.

Questions asked on the industries' applications regarding "slug potential" (See Attch. A-2d) were answered "No". Slug discharge potential was discussed during the site visits and it was agreed the three visited had no apparent slug discharge potential although they all had a "slug control plan".

The City must conduct its own slug discharge potential evaluation per industry and should retain these signed and dated documents in the industries' files.

C) RECOMMENDED POTW ACTIONS FOR IMPROVED IMPLEMENTATION OF THE PRETREATMENT AND POLLUTION PREVENTION (P2) PROGRAMS

1) Recommend finishing the City's Pretreatment Program's revisions to come into compliance with the Streamlining revisions to 40 CFR 403. The City representative has been given other Arkansas' cities example Pretreatment Ordinances to help in this endeavor.

2) Recommend including columns on the City's IU survey "master list" (data base) to include "sanitary only" and toxic/incompatible chemicals on-site with potential to be discharged to the City's collection system.

3) Recommend tailoring IU survey questions to reflect different business sectors' practices. The questions asked of an auto repair shop or machine shop would not be reflective of wastewater operations at a hair salon or a screen printer.

The City must continue sending surveys to any non-domestic user that may be subject to CFR 403 and the City's Pretreatment Program. With the maturity of its P2 program, the other facilities the City should focus on would be the long term care homes, chiropractors, clinics with x-ray equipment and wet chemistry x-ray processing, machine shops, auto body repair shops, lithographic screen printers, dentists, veterinarians, etc. Most of these small quantity dischargers may not be deemed significant IUs, but may have opportunities for P2 activities and best management practices (BMPs).

4) Recommend including a clear step-by-step narrative describing how the City calculated conventional and non-conventional pollutant limits for applicable industries. This auditor had a difficult time understanding the basis for T. Phosphorous and $CBOD_5$ limits even after the City representative tried to explain their derivation. These "local limits" did not appear to be based on an allocation of either parameters' maximum allowable industrial loading (MAIL), but more or less on performance which is acceptable and unique.

5) Recommend rewording or removing "Section C. SPECIALIZED REQUIREMENTS, 1. Phosphorous Reduction" (see Attch. A-3f). This clause seems redundant as some industries already have T. Phosphorous limits.

If the City wishes to attempt further reduction of Phosphorous loadings into their wastewater treatment plant, this clause could be re-worded to emphasize "...implement further Phosphorous reduction BMPs to reduce loading levels by a certain % below current levels before their next permit renewal" (or words to that effect) although the "active" industries may have already reached the point of diminishing returns.

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). It is realized this is a one-time notification requirement in CFR 403, but these generators seem to very mobile moving out of and into different cities frequently.

7) Recommend including more narrative on the City's IU inspections regarding chemical handling procedures. How do their virgin chemicals get from the un-loading dock to their eventual work station? Fork lift, over-head piped, barrel dolly, hand carried buckets/containers, etc? These inspection forms should also be signed and dated by both the City and industry representative at least on the first or last page.

8) Recommend requiring all permitted IUs to submit an updated/detailed wastewater flow schematic from the source(s) from which it was generated through pretreatment to the final sampling point. These schematics should include all active tanks, process, storage and those in the pretreatment area.

These schematics should include flow directional arrows and actual layout of all tanks with chemical feed lines. Obviously, these would not have to be to scale, just clearly identified.

During the file review and site visits, not all schematics found in the City's files included a comprehensive wastewater flow schematic. This auditor could not easily "follow" these streams during some of the IUs' site visits.

It would be beneficial for the industry representative to be intimately familiar with their wastewater generating processes and know their facility's wastewater flows without a question. It would also be in the City's best interest to have these on file so Pretreatment personnel can also be more

familiar with their IUs' regulated wastewater generating processes, flow-lines and pretreatment details.

It is advisable for the City to send the industry representatives their fact sheets requiring them to update/revise/correct the information already gathered. Their manufacturing process narratives "version" should also be requested. Any updates should be dated when they were last revised and received by the City.

9) Recommend recycling duplicate file information, old (more than three years) *non-enforcement* related correspondence and old draft or expired industry permits. Current permit applications which may be older than three years should be kept as well as the categorical industries' baseline monitoring reports in the industries' files.

10) Strengthen the Cities' industries understanding of P2. Ozark Mountain Poultry's permit application mentions only recycling under "Section 5" (Attch. A-2d).

11) Recommend submitting a succinct public announcement to the City's newspaper to help educate its citizens what they can do to reduce Phosphorous contributions to the collection system. Many detergents and soaps are now being made Phosphorous free or at least with lower concentrations. An explanation as to why Phosphorous reduction is so important should not be that difficult to explain as well as what it may cost the City and its citizens to remove once a maximum daily load is placed in Rogers' NPDES permit.

D) REQUIRED PROGRAM MODIFICATIONS TO THE APPROVED PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY REQUIREMENTS

The City's Pretreatment Program is not current with the Streamlining Revisions to 40 CFR 403. Program modification must be submitted and will be required upon NPDES permit renewal. It would be advisable for the City to submit its Program modifications before its permit is renewed.

* * * * * * * *

The City should consider the required actions and recommendations contained in this audit/assessment before finalizing any pretreatment program modifications. Any intended substantial program/ordinance changes made, whether in response to the recommendations or otherwise, should be submitted to ADEQ for review and approval.

PRETREATMENT AUDIT CHECKLIST
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)

SECTION I: GENERAL INFORMATION

A. GENERAL INFORMATION

Control Authority Name: City of Rogers NPDES #: AR0043397
Mailing address: 4300 Rainbow Road, Rogers 72758-1440
Permit Signatory: Earl Rausch Title: Utilities Superintendent

Telephone: 479.621.1142 FAX NUMBER: 479.621.1146

Pretreatment Contact: Paul Burns Title: Pretreatment Coordinator
Address: same
Telephone: 479.273.7378 x - 306
e-address: paulburns@rwu.org
Pretreatment program approval date: 1/13/84

Dates of approval of any substantial modifications: 11/1/06

Month Annual Pretreatment Report Due: January

Pretreatment Year Dates: 1/1 - 12/31 Date(s) of Audit: 11/4 - 6/14 (Assessment)

Inspector:

NAME	TITLE/AFFILIATION	PHONE NUMBER
Allen Gilliam	Pret. Coord./ADEQ	501.682.0625

Control Authority representative(s):

NAME	TITLE	PHONE NUMBER
* Paul Burns	Pretreatment Coordinator	Same x - 306
Cary Roth	Environmental Services Coordinator	" x - 304
Camille Montgomery	Environmental Technician	" x - 31

* Identifies Program Contact

Dates of Previous PCIs/Audits:

TYPE	DATE	DEFICIENCIES NOTED
PCI	5/12	Compliant

SECTION I: GENERAL INFORMATION

YES	NO	
___	✓	Is the Control Authority currently operating under any pretreatment related consent decree, Administrative Order, compliance or enforcement action?
		If yes, describe the required corrective action: _____
___	✓	Is the Control Authority currently in SNC or RNC?

. . . . . .

The remainder of this page has been left blank, but provides a place to enter a narrative description of any information that may not fit appropriately into the questions that are asked. Mark questions or input areas with a asterisk or footnote that tells that there is more explanatory information and where it can be found.

SECTION I: GENERAL INFORMATION

B. TREATMENT PLANT INFORMATION

1. THIS PRETREATMENT PROGRAM COVERS THE FOLLOWING NPDES PERMITS/TREATMENT PLANTS:

NPDES Permit No.	Name of Treatment Plant	Effective Date	Expiration Date
AR0043397	Rogers Pollution Control Facility	3/1/06	2/28/11*

*On "hold" waiting on TMDL for receiving stream

2. Individual Treatment Plant Information

a. Name of Treatment Plant: same
Location Address: same

Expiration Date of NPDES Permit: same

Treatment Plant Wastewater Flow: Design- 14 MGD; Actual (Average)- ~8.13* MGD
*Includes discharge to golf course - 2013 data

Sewer System: 100 % # of SSOs due to grease blockages: 0

Industrial Contribution to this Treatment Plant

# of SIUs: 12 #of CIUs: 5
Industrial Flow (mgd): 0.837 Industrial Flow (%): 10.3 %

Level of Treatment (Tertiary) Type of Process(es):

Primary treatment through fine screens and vortex grit removal; high flow equalization basin capacity; return activated sludge mix with post preliminary treated influent; three five station trains: fermentation, 1st anoxic, oxic (nitrification basin), 2nd anox. & reaeration, secondary clarifier for each train; tertiary filtration with sand and anthracite media (traveling bridge); chlorination followed by de-chlorination; effluent passes thru oxygen injection before flowing thru flume to receiving stream; WAS is dewatered with a centrifuge; the original two trains were upgraded with aerators and other minor mods.

Method of Disinfection: Chlorination

Dechlorination: ✓ YES ____ NO

Effluent Discharge

Receiving Stream Name: Osage Creek then to the Illinois River

Receiving Stream Classification: Segment 3J of Arkansas Riv. Basin

Receiving Stream Use: primary contact recreation, raw water source for public, industrial and AG water supplies, propagation of desirable species of fish and other aquatic life and other compatible uses.

If effluent is disposed of to any location other than the receiving stream, please note: Outfall 002, Pinnacle Golf Course - "C" Lake (as needed)

Method of Sludge Disposal:		Quantity of Sludge:	
✓	Land Application	1474	dry tons/yr. (2013)
____	Incineration	____	dry tons/yr.
____	Monofill	____	dry tons/yr.
____	Mun. Solid Waste Landfill	____	dry tons/yr.
____	Public Distribution	____	dry tons/yr.
____	Lagoon Storage	____	dry tons/yr.
____	Other (specify)	____	dry tons/yr

List of toxic pollutant limits in NPDES permit: conventionals, NH3-N, TRC & T.Phos

SECTION I: GENERAL INFORMATION

a. (continuation of individual treatment plant information for Rogers Pollution Control Treatment Plant.)

YES NO

✓ ___ Does the Control Authority hold a sludge permit or has the NPDES permit been modified to include sludge use and disposal requirements? If yes, specify the following:

Issuing Authority: ADEQ
Issuance Date: same as above
Expiration Date: "

List pollutants that are specified in current NPDES permit:
Ref. to CFR 503, As, Cd, Cu, Pb, Hg, Ni, Se, Zn, TKN, P, K, Mg & PCBs

YES NO N/A

✓ ___ ___ Has the Control Authority submitted results of whole effluent biological toxicity testing.

___ ✓ ___ Has there been a pattern of toxicity demonstrated by effluent toxicity testing? If yes, explain what has been or is being done about it (eg. Is there an ongoing TRE?). No sub-lethal or lethal effects in either species seen over the last 3 years.

How many times were the following monitored during the past pretreatment year?

	Influent	Effluent	Sludge	Ambient
Metals *	4	4	4	
Priority **	1	1		
Biomonitoring		4		
TCLP			1	

Other: At two sites (above & below the POTW's outfall) TSS, T.Phos., NH3, Ortho-Phos, TN, Nitrites and Nitrates are still being sampled 6 times/yr

* As identified at 40 CFR 122, Appendix D, Table III, ** As identified at 40 CFR 122, Appendix D, Table II

Summarize any trends over the last five years regarding pollutant (influent, effluent and sludge) loadings. Have they increased, decreased, or stayed the same. Evaluate for each parameter measured.

T. Phos, BOD and metals have trended downward since last audit.

YES NO N/A

✓ ___ ___ Has the POTW begun tracking the trends in the above samples?

___ ✓ ___ Has the POTW violated it's NPDES Permit either for effluent limits or sludge over the last 12 months?

If yes, List the NPDES effluent and sludge limits violated and the suspected cause(s)

Parameters Violated	Cause(s)
n/a	

YES NO

___ ✓ Has the treatment plant sludge violated the TCLP Test?

SECTION II: PROGRAM ANALYSIS AND PROFILE

C. Control Authority Pretreatment Program Modification [403.18]

YES	NO	
___	✓	Has public comment been solicited during revisions to the Sewer use ordinance and/or local limits since the last program modification? [403.5(c)(3)]
___	✓	Have any substantial modifications been made or requested to any pretreatment program components since the last audit? If yes, identify below.

Updated Program elements including a revised Pretreatment Ordinance, a revised ERP, a re-evaluation of their MAHL and the need for local limits was submitted, reviewed, approved (11/1/06) but not incorporated into their NPDES permit. Although expired permit's fact sheet addresses this, it the actual date of approval needs incorporation. [Same comment from the last two audits.]

1. Modifications:

Date Approved by ADEQ	Ordinance Citation/ Nature of Modification	Date Incorporated in NPDES Permit
11/1/06	See above (Ord. #04-150)	Cannot modify expired permit.

2. Modifications in Progress:

Date Requested	Nature of Modification
n/a	RWU is currently reviewing "Streamlining" req'd mods for a future mod. submittal. The City is currently updating removal efficiencies for updated TBLL evaluation, a new FOG control program manual has been drafted and preparation of a "Streamlined" draft Ordinance is underway.

YES	NO	
___	✓	Have any changes been made to any pretreatment program components (excluding any listed above)? If yes:
___n/a___		Has the Control Authority notified the Approval Authority of all program changes? (e.g., Modified forms, procedures, legal authorities). If no, please copy and attach the modified form, etc.

D. Legal Authority [403.8(f)(1)]

Date of original Pretreatment Program approval: 1/13/84 [ICIS]
Date of most recent Ordinance approved by the Control authority: 12/14/04
Date of most recent Pretreatment Program modification approval: 11/1/06*
*Not incorporated into the City's NPDES permit yet.

Does the Control Authority's legal authority enable it to: [403.8(f)(1)(i-vii)]

YES	NO	
✓	____	Deny or condition pollutant discharges
✓	____	Require compliance with standards
✓	____	Control discharges through permit or similar means
✓	____	Require compliance schedules and IU reports
✓	____	Carry out inspection and monitoring activities
✓	____	Obtain remedies for noncompliance
✓	____	Comply with confidentiality requirements
✓	____	Establish Pollution Prevention
____	✓*	Has the city developed and adopted a Pollution Prevention policy?

It is one of the new Ordinance's (12/14/04) purposes/objectives

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

___ ✓ Has the Control Authority experienced difficulty in implementing the sewer use ordinance? If yes, identify reason:

_____ No oversight authority
_____ No inspection authority
_____ No remedies for noncompliance
_____ No "equivalent" standard
_____ No clear delineation of responsibility for program implementation
_____ Interjurisdictional agreements not entered into
_____ Other, Specify: _____

✓ ___ Are all industrial users located within the jurisdictional boundaries of the Control Authority? If no:

___n/a___ Has the Control Authority negotiated all legal agreements necessary to ensure that pretreatment standards will be enforced in contributing jurisdictions?

___n/a___ Have provisions been made for the incorporation of Pollution Prevention (P^2) policies by contributing jurisdictions?

List the name of contributing jurisdictions, if any, the number of CIUs, SIUs and type of multijurisdictional agreements in those jurisdictions:

	Name of Jurisdiction/SIU	Number of CIUs	Number of Other SIUs	Type of Agreement
1.	n/a			
2.				

If relying on activities of contributing jurisdictions, indicate which activities are performed by jurisdictions and describe any problems in their implementation. *n/a*

		Problems
___	Updating industrial waste survey	*n/a*
___	Notification of IUs	
___	Permit issuance	
___	Receipt and review of IU reports	
___	Inspection and sampling of IUs	
___	Assessment of IUs for P^2 activity	
___	Analysis of samples	
___	Enforcement	
___	Other: _____	

Briefly describe other problems: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

Identify any IUs that have caused problems of interference, upset, pass through, sludge contamination, problems in the collection system, or worker health and safety in the past 12 months:

IU Name	Problem	NPDES Permit Violation Yes	No
n/a			

E. Industrial User Characterization [403.8(f)(2)(i)]

YES	NO	
✓		Has the Control Authority (CA) updated its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)] *21 IU surveys were sent out in '13 & '14 & the City has now developed a spreadsheet to track their pertinent info.*
✓		If yes, while conducting the IWS, was each potential IU evaluated by the CA for the possibility of incorporating P^2 activity?
✓		Does the Control Authority have written procedures to update its Industrial Waste Survey (IWS) to identify new Industrial Users (IUs) or changes in wastewater discharges at existing IUs? [403.8(f)(2)(i)]
	✓	If yes, do the written procedures include provisions for the assessment of potential new IUs to incorporate P^2 activity and the distribution of P^2 reference materials to the IUs which qualify?

What methods are used to update the IWS:

- ✓ Review of newspaper/phone book
- ✓ Review of plumbing/building permits
- ✓ Review of water billing records
- ✓ Permit reapplication requirements
- ✓ Onsite inspections
- ✓ Citizen involvement
- ✓ Other (specify) Questionnaires, city business license, chamber of commerce business listing

How often is the survey to be updated? Ongoing

Are there any problems that the Control Authority has in identifying and categorizing SIUs: None apparent

YES	NO	
	✓	Have any new SIUs been identified within the last 12 months? If yes:

Name of IU	Type of Industry	Is the IU Permitted?
n/a		

How many IUs are currently identified by the Control Authority in each of the following groups:

a. 12 SIUs (As defined by the Control Authority) [ICIS]
b. 5 Categorical Industrial Users (CIUs) [ICIS]
c. 7 Noncategorical SIUs
d. 1 Other regulated nonsignificant IUs (Describe) One porta-potty hauler, sometimes bringing a load of septage.

13 TOTAL of a. + d.

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

? ___ Has the POTW identified any IUs with Pollution Prevention opportunities?

✓* ___ Is the Control Authority's definition of "significant industrial user" the same as EPA's? [403.3(t)(1)(i-ii)] **Not current with Streamlining's.*

~~If not, the Control Authority has defined "significant industrial user" to mean:~~
* Permittees are required to review and re-submit P2 plans annually. City now includes requirement to report additional P2 activities & goals

F. Control Mechanism Evaluation [403.8(f)(1)(iii)]

YES NO

* ___ Has the Control Authority asked for Best Management Practices (BMPs) or Pollution Prevention assessments as part of the permit application?
**Permits require P2 practices and Phosphorous management plans.*
Describe the Control Authority's approved control mechanism (e.g., permit, etc.): Permit

What is the maximum term of the control mechanism? 5 yrs (by Ordinance)

0 How many SIUs are not covered by an existing, unexpired permit or other control mechanism? [ICIS] If there are any SIUs without current (unexpired) permits, please complete the information below:

IU NAME	PERMIT EXPIRATION DATE
n/a	

YES NO

✓* ___ Does the Control Authority accept trucked septage wastes?

___ ✓ Does the Control Authority accept other trucked wastes?

✓+ ___ Does the Control Authority have a control mechanism for regulating trucked wastes? If yes, answer the following:

**Porta potty waste and an occasional load of septage. +Very vague, see Attch. A-1*

YES NO

✓ ___ Does Control Mechanism designate a discharge point? [403.5(b)(8)]

✓ ___ Are all applicable categorical standards and local limits applied to trucked wastes?

List all pollutants and applicable limits, other than local limits and categorical standards, that are applied to waste haulers:

Pollutant	Limit
"Permit" references the city ordinance and mentions Haz Waste. See Attach. A-1 for example.	

Describe the discharge point(s) (including security procedures):
At a 8' X 8' bermed and grated inlet structure. Dumps are witnessed by city personnel.

___ ✓ Does the Control Authority accept Underground Storage Tank (UST) cleanup wastes? *Ordinance does allow for special exceptions.*

___ ✓ Does the Control Authority have a control mechanism for regulating wastes from UST sites?

SECTION II: PROGRAM ANALYSIS AND PROFILE

List all pollutants and applicable limits, other than local limits and categorical standards, that are applied to UST cleanup sites:

Pollutant	Limit
n/a	

G. Application of Pretreatment Standards and Requirements

YES NO

✓ ___ Has the POTW notified the IUs of their potential requirement to report hazardous wastes to EPA, the State, and the POTW?

2/09 Date Notified Letter Method of Notification

How does the Control Authority keep abreast of current regulations to ensure proper implementation of standards?

✓	Federal Register	✓	Journals, Newsletters
✓	Meetings, Training	✓	Other internet
✓	Government Agencies	✓	Other WEF

YES NO

✓ ___ Is the Control Authority in the process of making any changes to its local limits (MAHLs) or have limits changed since the last PCI, Audit or Annual Report?

City is re-evaluating all of their MAHLs/MAILs.

If yes, complete the information below:

Pollutant Changed	Old Limit	New Limit	Reason for Change
Pending			

YES NO

✓ ___ Has the Control Authority technically evaluated the need for local limits for all required pollutants listed below? [ICIS-EVLL] [403.5(c)(1); 403.8(f)(4)]

	Headworks Analysis Completed?		Local Limits Needed?		Local Limits Adopted? (narrative in Ord)		11/06 developed MAHLs (mg/l)
	Yes	No	Yes	No	Yes	No	
Arsenic (As)	✓			✓		✓	0.025
Cadmium (Cd)	✓			✓		✓	0.019
Chromium-Total	✓			✓		✓	0.528
Copper (Cu)	✓			✓		✓	0.678
Cyanide (CN)	✓			✓		✓	0.027
Lead (Pb)	✓			✓		✓	0.071
Mercury (Hg)	✓			✓		✓	0.00005
Molybdenum (Mo) *	✓			✓		✓	0.053
Nickel (Ni)	✓			✓		✓	0.019
Selenium (Se) *	✓			✓		✓	0.016
Silver (Ag)	✓			✓		✓	0.1
Zinc (Zn)	✓			✓		✓	0.5

* - *If necessary for the sludge disposal option chosen.*

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Has the Control Authority identified pollutants of concern other than the required pollutants and technically evaluated the need for local limits for these? If yes, provide the following information:

POLLUTANT	Headworks Analysis Completed? Yes	No	Local Limits Needed? Yes	No	Local Limits Adopted? Yes	No	Numerical Limit Adopted (mg/l)
T. Phos	✓		✓			✓	(Poultry) Industry dependent
CBOD5	✓			✓		✓	n/a

YES NO

✓* ___ Where it has been determined that certain pollutants need to have limits, has the POTW identified the sources of the pollutants?
**City has requested P2 practices at IUs with Phosphorous and high strength CBOD containing wastewater.*

What method of allocation ~~was~~ "would be" used for local limits for each pollutant that has a local limit in-place?

	TYPE OF ALLOCATION		
	Uniform Concentration	Mass	Hybrid
Arsenic (As)			
Cadmium (Cd)	Current Pretreatment personnel indicated		
Chromium-Total	that they'd probably use the "creative"		
Copper (Cu)	allocation (tiered) system if local limits		
Cyanide (CN)	were necessary for these heavy metals,		
Lead (Pb)	arsenic and cyanide. (See EPA's latest		
Mercury (Hg)	July 2004 TBLL guidance manual)		
Molybdenum (Mo)			
Nickel (Ni)			
Selenium (Se)			
Silver (Ag)			
Zinc (Zn)			

If there is more than one treatment plant, were the local limits established specifically for each plant or were local limits applied uniformly to all plants? ___
n/a

SECTION II: PROGRAM ANALYSIS AND PROFILE

H. COMPLIANCE MONITORING

Compliance Monitoring and Inspection Requirements:

Program Aspect	Approved Program	Federal Requirement		Explain Difference
		Actual		
Inspections:				
CIUs	1/yr	1/yr	1/year	
Other SIUs	"	"	1/year	
Sampling:				
CIUs	1-2/yr	2/yr	1/year	"Just keeping
Other SIUs	"	2/yr	1/year	the IUs on their toes"
Reporting:				
CIUs	4/yr	2-12/yr	2/year	"
Other SIUs	"	"	2/year	"
Self-Monitoring:				
CIUs	4/yr	2-12/yr	2/year	"
Other SIUs	"	2-48/yr	2/year	"

#	%	How many and what percentage of SIUs were: (refer to p.1 for Pretreatment year)
0	0	Not sampled at least once in the past reporting year?
0	0	Not inspected at least once in the past Pretreatment reporting year?
0	0	Not inspected and not sampled at least once in the past reporting year ? [ICIS]-[403.8(f)(2)(v)]

Attach the names of SIUs that were not sampled and/or not inspected within the last Pretreatment reporting year. Include an explanation next to each name as to why it was not sampled and/or not inspected. ***N/A***

Does the Control Authority routinely split samples with industrial personnel:

YES	NO	
✓		If requested?
✓		To verify IU self-monitoring results?

Provide the following information regarding pollutant analyses done by the POTW:

	Analytical Method*	Name of Laboratory
Metals	ICP/MS	Environmental Testing Group
Cyanide	Spectrophotometric	AR Analytical
Organics	GC/MS	AR Analytical
Other	Biomonitoring	Huther & Associates
	O&G, Phenols	ETG, AR Analytical
	Conventionals	City's lab and ETG

Were all wastewater samples analyzed by 40 CFR 136 methods? ***YES***

* Enter the type of Analytical Method used for each group of pollutants (eg. AA-flame, AA-furnace, GC, GC/MS, ICP, etc.)

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

✓ ___ Does the POTW use QA/QC for sampling and analysis? If yes, describe: City uses EPA QA samples, has a written QA plan, QC requirements, sample custody and handling procedures & QA objectives. City also conducts dupes, spikes, etc.

How much time normally elapses between sample collection and obtaining analytical results for:

1 wk Conventionals & T. Phos.
<2 wks Metals
<2 wks Organics

✓ ___ Is there an established protocol clearly detailing sampling location and procedures?

___ ✓ Has the Control Authority had any problems performing compliance monitoring?

If yes, explain: _____

Does the Control Authority use the following methods for compliance monitoring?

YES	NO	
✓	___	Scheduled compliance monitoring *(for batch discharges)*
✓	___	Unscheduled compliance monitoring
✓	___	Demand monitoring for IU compliance
✓	___	IU self-monitoring
___	___	Other: _____

YES NO

___ ✓ Has the Control Authority identified any violation of the prohibited discharge standards in the last reporting year? If yes, describe below.

I. ENFORCEMENT

YES NO

✓* ___ Is the Control Authority definition of SNC consistent with EPA's? [403.8(f)(2)(vii)] **Not with the current "Streamlining" version because their Program is currently being revised and NPDES permit is on hold.*

✓ ___ Does the Control Authority have a written enforcement response plan? [403.8(f)(5)]. If yes, does the plan:

YES	NO	
✓	___	Describe how the Control Authority will investigate instances of noncompliance
✓	___	Describe the Control Authority's types of escalating enforcement responses and the periods for each response
✓	___	Identify by Title the Official(s) responsible for implementing each type of enforcement response
✓	___	Reflect the Control Authority's responsibility to enforce all applicable pretreatment requirements and standards

SECTION II: PROGRAM ANALYSIS AND PROFILE

Check those compliance/enforcement options that are available to the POTW in the event of IU noncompliance: [403.8(f)(1)(vi)]

✓	Notice or letter of violation	✓	Administrative Order
✓	Setting of compliance schedule	✓	Revocation of permit
✓	Injunctive relief	✓	Fines (maximum amount):

civil $ 1000 /day/violation
criminal $ 1000 /day/violation
administrative $ _____ /day/violation

✓ Imprisonment
✓ Termination of Service
_____ Other: _____

Describe any problems the Control Authority has experienced in implementing or enforcing its pretreatment program: None apparent

YES NO

✓ ___ When violations occur, does the Control Authority routinely notify SIUs and escalate enforcement responses if violations continue? [403.8(f)(5)]

✓ ___ Are SIUs required to notify the Control Authority within 24 hours of becoming aware of a violation and to conduct additional monitoring within 30 days after the violation is identified? [403.12(g)(2)].
Comment: And the IU is given a certain number of days to send a description of the cause of violation and provide a written corrective action plan (permit requirement)

___n/a__ If no, does the Control Authority conduct all of the monitoring?

YES NO N/A

✓ ___ ___ Does the pattern of enforcement conform to the Enforcement Response Plan?

Complete the following table for SIUs identified as SNC.
None since last Audit in 6/11

SIU Name	Date First Identified in SNC	Enforcement Action Type	Date	Return to Compliance? Yes (Date)	No
n/a					

Indicate the number and percent of SIUs that were identified as being in significant noncompliance during the past Pretreatment reporting period:

#	%	
0	0	Pretreatment Standards [ICIS] (Local Limits/Categorical Standards)
0	0	Self-monitoring requirements [ICIS]
0	0	Reporting requirements [ICIS]
0	0	Pretreatment compliance schedule [ICIS]
0		How many SIUs that are currently in SNC with self-monitoring and were not inspected or sampled? [ICIS]

SECTION II: PROGRAM ANALYSIS AND PROFILE

YES NO

___ ✓ Does the ERP provide for any Pollution Prevention activities as corrective actions? If so, give some examples. _____

Has the Control Authority experienced any of the following:

EXPLAIN and ID Industrial User

___ ✓ Interference [ICIS]. _____
___ ✓ Pass through [ICIS]. _____
___ ✓ Fire or explosions? (incl. flash point viol.) _____
___ ✓ Corrosive structural damage? (incl. pH <5.0). _____
___ ✓ Flow obstructions? _____
___ ✓ Excessive flow or pollutant concentrations? _____
___ ✓ Heat problems? _____
___ ✓ Interference due to oil or grease? _____
___ ✓ Toxic fumes? _____
✓ ___ Illicit dumping of hauled wastes? There was evidence of "midnight" dumping of grease at an isolated manhole

✓ ___ Does the Control Authority compare all monitoring data to applicable Pretreatment Standards and requirements contained in the control mechanism? [403.8(f)(2)(iv)]

0 How many SIUs are currently on compliance schedules?

___ ✓ Have any CIUs been allowed more than 3 years from the effective date of a categorical standard to achieve compliance with those standards? [403.6(b)]

Indicate the number of SIUs from which penalties have been collected by the Control Authority during the past Pretreatment reporting period:

	Number	Amount	
Civil	0	$ 0	
Administrative	0	$ 0	
Total	0	$ 0	[ICIS]

J. DATA MANAGEMENT/PUBLIC PARTICIPATION

YES NO

✓ ___ Are inspection & sampling records well documented, organized and readily retrievable? Are files/records:

YES	NO	
✓	___	computerized
✓	___	hard copy
___	___	OTHER: _____

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are the following files computerized:

YES	NO	
✓		Control Mechanism Issuance
✓		Inspection and Sampling schedule
✓		Monitoring Data
✓		IU Compliance Status Tracking
✓		Other: _____

Can IU monitoring data can be retrieved by:

✓		Industry name
✓		Pollutant type
✓		Industrial category or type
	✓	SIC/NAICS Code
✓		IU discharge volume
	✓	Geographic location
n/a		Receiving treatment plant (i.e.if > one plant in the system)
		Other (specify) _____

✓ ___ Does the POTW have provisions to address claims of confidentiality? [403.8(f)(1)(vii)]

___ ✓ Have IUs requested that data be held confidential?
How is confidential information handled by the Control Authority?
IU must send letter w/documents requesting confidentiality. This info is not made available to the public, but to government agencies.

✓ ___ Are there significant public or community issues impacting the POTW's pretreatment program?

If yes, please explain: Nutrients' issue with neighboring state may have an impact on the city with regard to permit limits & TBLLs. A TMDL is currently being developed for the City's receiving stream.

✓ ___ Are all records maintained for at least 3 years?

K. RESOURCES

What is the current level of resources dedicated to the Pretreatment Program in FTEs and funding amounts? [403.8(f)(3)] * - FTE = Full Time Equivalent Employee

2 FTEs, 1 full time coordinator and some lab assistance.

YES NO

___ ✓ Have any problems in program implementation been observed which appear to be related to inadequate funding?
If yes, describe and show below the source(s) of funding for the program:

		Percent of Total Funding
✓	POTW general operating fund (GOF)	100%
	IU permit fees	
	monitoring charges	
✓	industry surcharges (returned to GOF)	
	other (describe) _____	
	Total	100%

✓ ___ Is funding expected to continue near the current level? If no, will it:
Increase ____ or Decrease ____
If no, describe the nature of the changes:

SECTION II: PROGRAM ANALYSIS AND PROFILE

Are an adequate number of personnel available for the following program areas:

YES	NO		If no, explain
✓	___	Legal assistance	
✓	___	Permitting	
✓	___	IU inspections	
✓	___	Sample collection	
✓	___	Sample analyses	
✓	___	Data analysis, review and response	
✓	___	Enforcement	
✓	___	Administration (inc. record keeping /data management)	

Does the Control Authority have access to adequate:

YES	NO		If yes then list and if no, explain
✓	___	Sampling equipment	5 ISCO samplers, 1 pH meter & 2 DO meters
✓	___	Safety equipment	Standard equip and gas detector
✓	___	Vehicles	Dedicated Pretreatment van
✓	___	Analytical equipment	General lab equipment

L. POLLUTION PREVENTION

Rogers P2 Activities Summary as of 2014 (provided by City's Pretreatment Personnel)

At this time, all permitted IUs must develop a P2 plan. Some IUs, such as the poultry processors focus mainly on water conservation by installing low pressure nozzles on sanitation wands and incorporating routine inspections to identify leaks and excessive water use.

The poultry processors also continuously modify process line conveyors and chutes to reduce the amount of meat that falls to the floor.

Many IUs have increased recycling efforts that have reduced trash going to landfills by hundreds of tons.

Several IUs have implemented some impressive specific P2 efforts.

Bekaert Steel (BSC) is able to reuse NaOH from bath clean-outs and has fine-tuned the HCl pickling bath chemistry to lower chemical consumption. BSC installed a heat recovery system that utilizes a heating coil placed in a quench bath to heat a Cu plating bath. BSC has also installed dedicated overflow collection tanks for the Cu & Zn plating systems which eliminated the direct overflow connections to pretreatment. When BSC upgraded several air scrubbers to plated scrubbers, water usage per unit dropped from 30 to 7 gph.

Both Glad Mfg. (GMC) and Kennametal (KMT) have switched to solvents with a higher flashpoint that are not hazardous with respect to flammability.

At GMC, all plastic scrap is now reclaimed and reused in-house.

KMT eliminated freon based cleaners and Ni plating ops several years ago. KMT installed a heptane reclamation system that reduced overall heptane usages. Automated plate coating machines were added at KMT that apply a uniform coating onto sintering plates which reduces the amount of over-spray and waste. KMT also moved from an

L. POLLUTION PREVENTION (cont.)

isopropyl based alcohol cleaning system to a water-based one for their wear parts process.

Superior Industries (SII) installed a new 2 train 4 stage washer that required an enormous amount of troubleshooting to track and reduce overflow rates. The washer's 3rd and 4th contained T-Phos detergents with a concentration as high as 8,000 mg/l. SII personnel reduced overflows to a minimum, then diverted them to a 4,000 gallon tank. The wastewater could then be slowly metered to the POTW at a uniform low flow rate. SII reduced their T-Phos concentration from a high monthly avg of 18.4 mg/l in Oct. '13 to a low of 18.4 mg/l in Oct. '13 to a low of 4.4 mg/l by Jan. '14. Residents of Rogers are encouraged to take advantage of its large recycling facility that also accepts used cooking oil. They are also made aware of the Benton County Solid Waste Household Hazardous Waste Program.

Food service establishments are asked to implement Clean Kitchen Practices and to recycle used cooking oil to reduce the amount of fats, oils and grease entering the sanitary collection system.

SECTION II: PROGRAM ANALYSIS AND PROFILE

FILE #: 1 Industry Name: Ozark Mountain Poultry File/ID No. 13-OMP
Industry Address: 750 W. Easy Street
Industry Description: Poultry further processing (de-boning)
Industrial Category: n/a 40 CFR n/a SIC/NAICS Code: 2015/311615-0171
Avg. Total Flow (gpd): ? Avg. Process Flow (gpd) >82,000
Industry visited during audit: YES

Comments:

FILE #: 2 Industry Name: Pel-Freez File/ID No. 13-PFM
Industry Address: 404 N. Arkansas Street
Industry Description: Mainly rabbit kill plant w/some poultry kill
Industrial Category: n/a 40 CFR n/a SIC/NAICS Code: 2015/311611
Avg. Total Flow (gpd): ? Avg. Process Flow (gpd): ~28,300

Industry visited during audit: YES

Comments: Facility saves the rabbits' blood for research

FILE #: 3 Industry Name: Tysons Foods Chick-N-Quick File/ID No. 13-TCQ
Industry Address: 400 West Church
Industry Description: Further processing of poultry
Industrial Category: n/a 40 CFR n/a SIC/NAICS Codes: 2015/311615
Avg. Total Flow (gpd): ? Avg. Process Flow (gpd): ~426,000

Industry visited during audit: YES

Comments:

FILE #: 4 Industry Name: Tysons of Rogers File/ID No. 13-TOR
Industry Address 212 East Elm Street
Industry Description: Further processing of poultry (raw deboned products)
Industrial Category: n/a 40 CFR n/a SIC/NAICS Code: 2015/311615
Avg. Total Flow (gpd): ? Avg. Process Flow (gpd): ~85,000

Industry visited during audit: NO

Comments: by-products are mechanically separated

SECTION II: PROGRAM ANALYSIS AND PROFILE

A. Industrial User Characterization

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
1. Is the IU considered "significant" by the Control Authority?	✓	✓	✓	✓	
2. Is the user subject to categorical pretreatment standards?	no	no	no	no	
a. New source or existing source (NS or ES)?	n/a	n/a	n/a	n/a	
b. Is this IU one identified as having P^2 potential?	1	1	1	1	

B. Control Mechanism

1. Does the file contain an application for a control mechanism? *(See Attach. A-2 for example)*	✓	✓	✓	✓	
If yes, what is the application date?	10/12	10/12	9/12	9/12	
Does it ask for Pollution Prevention information?	✓	✓	✓	✓	
2. Does the file contain a Permit? *(See Attach. A-3 for example)*	✓	✓	✓	✓	
Permit Expiration Date?	12/16	12/16	12/17	12/16	
Is a fact sheet included? *(See Attach. A-4 for example)*	✓	✓	✓	✓	
3. Has the SIU been issued a control mechanism containing: [403.8(f)(1)(iii)(B)(1)-(6)]					
a. Legal Authority Cite?	✓	✓	✓	✓	
b. Expiration date?	✓	✓	✓	✓	
c. Statement of nontransferability?	✓	✓	✓	✓	
d. Appropriate discharge limitations?	2	2	2	2	
e. Appropriate self-monitoring requirements?	✓	✓	✓	✓	
f. Sampling frequency?	✓	✓	✓	✓	
g. Sampling locations?	✓	✓	✓	✓	

Comments: 1) Permits have P2 update requirements; 2) "Local limits" for the above IUs' CBOD & T. Phos limits are an MAIL allocated mass based on contributory flow (in this office's opinion). City rep would describe it differently as they are not truly mass-based on contributory flow per EPA guidance the way the City rep explained their derivation.

SECTION II: PROGRAM ANALYSIS AND PROFILE

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
h. Requirement for flow monitoring?	✓	✓	✓	✓	
i. Types of samples (grab or composite) for self-monitoring?	✓	✓	✓	✓	
j. Applicable IU reporting requirements?	✓	✓	✓	✓	
k. Standard conditions for:					
Right of Entry?	✓	✓	✓	✓	
Records retention?	✓	✓	✓	✓	
Civil and Criminal Penalty provisions?	✓	✓	✓	✓	
~~Revocation~~ of permit? *"Termination"*	✓	✓	✓	✓	
l. Compliance schedules/ progress reports	n/a	n/a	n/a	n/a	
m. General/Specific Prohibitions?	✓	✓	✓	✓	
n. Where technologically and economically achievable, are P^2 aspects included?	1	1	1	1	

C. Application of Standards

1. Has the IU been properly categorized?	✓	✓	✓	✓	
2. Were both Categorical Standards and Local Limits properly applied?	✓	✓	✓	✓	
3. Was the IU notified of recent revisions to applicable pretreatment standards? [403.8(f)(2)(iii)]	n/a	n/a	n/a	n/a	
4. For IUs subject to production-based standards, have the standards been properly applied? [403.8(f)(1)(iii)]	n/a	n/a	n/a	n/a	
5. For IUs with combined wastestreams is the Combined Wastestream Formula or the Flow Weighted Average formula correctly applied? [403.6(d) and (e)]	n/a	n/a	n/a	n/a	
6. For IUs receiving a "net/ gross" variance, are the alternate standards properly applied?	n/a	n/a	n/a	n/a	

Comments: 1) "technologically and economically achievable"? Doubtful. But the poultry processors were required to implement/report P2 practices and progress to reduce Phos loadings. Based on their success, "limits" were put into place.

SECTION II: PROGRAM ANALYSIS AND PROFILE

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
7. Is the Control Authority applying a bypass provision to this IU?	✓	✓	✓	✓	
D. Compliance Monitoring					
Sampling					
1. Does the file contain Control Authority sampling results for the industry?	✓	✓	✓	✓	
2. Did the Control Authority sample as frequently as required by its approved program or permit? [403.8(c)]	✓	✓	✓	✓	
3. Does the sampling report(s) include: [403.8(f)(2)(vi)]					
a. Name of sampling personnel?	✓	✓	✓	✓	
b. Sample date and time?	✓	✓	✓	✓	
c. Sample type?	✓	✓	✓	✓	
d. Wastewater flow at the time of sampling?	✓	✓	✓	✓	
e. Sample preservation procedures?	✓	✓	✓	✓	
f. Chain-of-custody records?	✓	✓	✓	✓	
g. Results for all parameters? SIUs & CIUs [403.12(g)]	✓	✓	✓	✓	
4. Has the Control Authority appropriately implemented all applicable TTO monitoring/ management requirements?	n/a	n/a	n/a	n/a	
5. Did the Control Authority adequately assess the need for flow-proportion (FP) vs. time-proportion vs. grab samples?	FP	FP	FP	FP	
6. Were 40 CFR 136 analytical methods used?	✓	✓	✓	✓	

SECTION II: PROGRAM ANALYSIS AND PROFILE

Inspections	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
7. Does the IU file contain inspection reports?	✓	✓	✓	✓	
8. a. Has the Control Authority inspected the IU at least as frequently as required by the approved program or permit? [403.8(f)(2)(v)]	✓	✓	✓	✓	
b. Date of last Inspection	9/13	12/13	10/13	10/13	
9. Does the inspection *(See Attach. A-5 for example)* report(s) include:					
a. Inspector Name(s)	✓	✓	✓	✓	
b. Inspection date and time?	✓	✓	✓	✓	
c. Name and title of IU official contacted?	✓	✓	✓	✓	
d. Verification of production rates?	n/a	n/a	n/a	n/a	
e. Identification of sources, flow, and types of discharge (regulated, dilution flow, etc.)?	✓	✓	✓	✓	
f. Evaluation of pretreatment facilities?	1	1	1	1	
g. Evaluation of self-monitoring equipment and techniques?	2	2	2	2	
h. Evaluation of slug discharge control plan & need to develop? [403.8(f)(2)(v)]	3	3	3	3	
i. Manufacturing facilities?	✓	✓	✓	✓	
j. Chemical handling and storage procedures?	✓	✓	✓	✓	
k. Chemical spill prevention areas?	✓	✓	✓	✓	

Comments: 1) More narrative could be included regarding the maintenance or appearance of the equipment and appurtenances (rust, leaks, etc); 2) Could not locate any narrative regarding City personnel observing IUs' sampling techniques although he's spoken to each IU rep regarding proper sampling; 3) All have been required to develop a slug control plan. No City slug discharge evaluation could be located although there was reference to them (at least their "evaluation" dates) in some other

documents.

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
l. Hazardous waste storage areas and handling procedures?	n/a	✓	✓	✓	
m. Sampling procedures?	1	1	1	1	
n. Laboratory procedures?	n/a	n/a	n/a	n/a	
o. Monitoring records?	✓	✓	✓	✓	
p. Evaluation of Pollution Prevention opportunities?	✓	✓	✓	✓	
q. Control Authority inspector signature?	no	no	no	no	
IU Self-Monitoring and Reporting					
10. Does the file contain self-monitoring reports?	✓	✓	✓	✓	
11. Does the file include:					
a. BMR?	n/a	n/a	n/a	n/a	
b. 90-Day Report?	n/a	n/a	n/a	n/a	
c. All periodic reports?	✓	✓	✓	✓	
d. Compliance schedule reports?	n/a	n/a	n/a	n/a	
12. Did the IU report on all required parameters?	✓	✓	✓	✓	
13. Did the IU comply with the required sampling frequency(s)?	✓	✓	✓	✓	
14. Did the IU report flow?	✓	✓	✓	✓	
15. Did the IU comply with the required reporting frequency(s)?	✓	✓	✓	✓	
16. For all SIUs, are self-monitoring reports signed and certified?	✓	✓	✓	✓	
17. Did the IU report all changes in its discharge? [403.12(j)]	n/a	n/a	n/a	✓	

Comments: 1) See comment #2 from previous page. See Attach. A-5d for good description of sampling point, its comments about foaming and directions to compensate for the

pooling of stagnant water behind weir.

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
18. Has the IU developed a Slug Control and Prevention Plan?	1	1	1	1	
19. Has the industry been responsible for spills or slug loads discharged to the POTW?	no	no	no	no	
If yes, does the file contain documentation regarding:					
a. Did the spill cause Pass Through or Interference?	n/a	n/a	n/a	n/a	
b. Did POTW respond to the spill?	n/a	n/a	n/a	n/a	

E. Enforcement

1. Were all IU discharge violations identified in: [403.8(f)(2)(vi)]					
a. Control Authority monitoring results?	n/a	✓	n/a	✓	
b. IU self-monitoring results?	n/a	✓	n/a	n/a	
c. If NS CIU was it compliant within 90 days from commencement of discharge?	n/a	n/a	n/a	n/a	
2. How many reports submitted during the past reporting year indicated discharge violations?	0	0	0	0	
3. Did the IU notify the Control Authority within 24 hours of becoming aware of the violation(s)?	n/a	n/a	n/a	n/a	
4. Was additional monitoring conducted within 30 days after each discharge violation occurred?	n/a	n/a	n/a	n/a	
5. Were all nondischarge violations identified in the file?	n/a	n/a	n/a	n/a	

Comments: 1) P2 practices/slug control plans are required in the all permits. Some IUs are mistakenly addressing recycling as P2 and spill control instead of potential slug discharges.

SECTION II: PROGRAM ANALYSIS AND PROFILE

	FILE 1	FILE 2	FILE 3	FILE 4	FILE 5
6. Was the IU notified of all violations?	n/a	n/a	n/a	n/a	
7. Was follow-up enforcement action taken by the Control Authority?	n/a	n/a	n/a	n/a	
8. Did the Control Authority follow its approved ERP?	✓	✓	✓	✓	
9. Did the Control Authority's enforcement action result in the IU achieving compliance?	n/a	n/a	n/a	n/a	
10. Is there a compliance schedule? If yes:	no	no	no	no	
11. Were there any compliance schedule violations?	--	--	--	-	
12. Was SNC evaluated for the violations on a quarterly basis? [403.8(f)(2)(vii)]	✓	✓	✓	✓	
During such evaluation for SNC, did the CA consider each of the following criteria?					
a. Chronic violations	✓	✓	✓	✓	
b. TRC	✓	✓	✓	✓	
c. Pass through/Interference	✓	✓	✓	✓	
d. Spill/slug loads	✓	✓	✓	✓	
e. Reporting	✓	✓	✓	✓	
f. Compliance schedule	✓	✓	✓	✓	
g. others (specify)					
13. Was the SIU published for SNC?	n/a	n/a	n/a	n/a	
Date of publication.	n/a	n/a	n/a	n/a	

REPORTABLE NONCOMPLIANCE (RNC)
for the Pretreatment Audit Checklist

(MUNICIPAL POLLUTION PREVENTION ASSESSMENT CHECKLIST)

Control Authority: City of Rogers NPDES #: AR0043397

Date of Audit: 11/4 - 6/14 Date entered into ICIS: 12/5/14
(ASSESSMENT)

		Level
NO	Failure to enforce against pass through and/or interference	I
NO	Failure to submit required reports within 30 days	I
NO	Failure to meet compliance schedule milestone date within 90 days	I
NO	Failure to issue/reissue control mechanisms to 90% of SIUs within 6 months	II
NO	Failure to inspect or sample 80% of SIUs within the last reporting year	II
NO	Failure to enforce pretreatment standards and reporting requirements	II
NO	Other violations of concern	II

SIGNIFICANT NONCOMPLIANCE (SNC)

NO Is the Control Authority in SNC for violation of any Level I criterion.

NO Is the Control Authority in SNC for violation of 2 or more Level II criterion.

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Rogers NPDES #: AR0043397

Name, address and phone number of industry:
Pel-Freez, 404 N. Arkansas Street, 479.636.4361

Type of industry: Rabbit kill/slaughter house & research
Date/Time of visit: 11/5/14, 10:00 a.m.

Industry contacts: Brenda Creashak, QA Mgr./Env.; Rick Raspberry & Thomas Bise, Maintenance

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	✓		
4. Pretreatment equipment maintained and operational?	✓		
5. Hazardous waste generated or stored?	✓		
6. Proper solid waste disposal?	✓		
7. Solvent management/TTO control?			✓
8. Suitable sampling location?	✓		
9. Appropriate self-monitoring procedures/equipment?	✓		
10. Adequate spill prevention and control?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	?		

Additional comments:
Facility is a rabbit kill/slaughter plant with some research also being conducted. The actual "footprint" of the facility is rather small. Rabbits are commercially bred from Europe. All are white furred with red eyes and appear identical.
Live rabbits are pulled from large open-topped wire cages by their feet, struck in the back of the head/neck area to stun them into a seizure like appearance with a well placed blow from the blunt back edge of a large knife.
They are then hung by their now-broken feet on a small oval conveyor system which leads them through a head cut-off saw. Blood is captured in small vials for research for medicinal purposes. City rep indicated bovine, equine, goat, sheep and human blood are brought in to make serum products (blood clotting fluid, e.g.). A USDA rep is on location every day.

Visit conducted by: Gilliam/Burns/Roth Date: 11/5/14

Allen B. Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Rogers NPDES #: AR0043397
Industry name: Pel-Freez
Additional comments:
"Pelts" are slit in the thigh area and are hand stripped off completely intact passed the headless neck area. These pelts are placed in one of several plastic drums. Facility rep indicated she thought some of the white fur was sold to thread making companies.
Eviscerating takes place with interior cavity auto-washed with fresh water. Entrails/offal are collected through a rotating screen and sent to the landfill although some brain tissue, eyes, lungs and hearts are also salvaged for research.
Not much attention was given to the research part of the building or the minimal wastewater it generated. The rabbit offal cannot be rendered for other animal feed because of its fecal matter.
Body of cleaned rabbit is sent through a chiller (40°F), packaged on ice and sent to customers mainly on the east coast.
Sampling flume appeared clean and samples are flow proportioned.
Industry reps were cooperative and open. The City reps were familiar with the facility's operations and "coarse" screening pretreatment.
Facility's production was estimated at ~1,000 rabbits/day with only 3 production days although the research part of the plant operates 5 days/week.
The facility's wastewater does not contain high strength conventionals like poultry kill/further processors.

Visit conducted by: Gilliam/Burns/Roth Date: 11/5/14

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Rogers NPDES #: AR0043397

Name, address and phone number of industry:
Ozark Mountain Poultry, 750 W. East Street, 479.633.8600 x - 4264
Type of industry: poultry de-boning Date/Time of visit:
11/5/14 / 11:00 a.m.
Industry contacts: Tommy Lewis, Maintenance Mgr.,

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	✓		
4. Pretreatment equipment maintained and operational?	✓		
5. Hazardous waste generated or stored?	✓		
6. Proper solid waste disposal?	✓		
7. Solvent management/TTO control?			✓
8. Suitable sampling location?	✓		
9. Appropriate self-monitoring procedures/equipment?	✓		
10. Adequate spill prevention and control?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

Additional comments: The truck trailers carrying the frozen chicken back up to receiving docks at a downward slope. Any liquids would be caught in a trough and pumped to the wet well if they were backed up enough for the melt water to drop into them. Most observed were not backed up enough for this to happen.
Facility receives ice packed (in cubic yard plastic lined cardboard boxes) whole chickens which are cut into front and back halves. The "fronts", breast and wing meat are conveyed to "cone" lines and the back halves ("saddles") are further processed into whole legs, then sent to deboning or leg quarters that can be cut into drums or thighs. Processes involve manually removing bones and skin. Estimates of 120 "birds" per minute are processed. Some of the tray pack product is marinated using an injection system or vacuum tumbler.
Chlorine, sodium hypochlorite and quaternary ammonia is used for clean-up and disinfection and foot wash trays.
Flow increases significantly during the "graveyard" shift which is their sanitation shift.

Visit conducted by: Gilliam/Burns/Roth Date: 11/5/14

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Rogers NPDES #: AR0043397
Industry name: Ozark Mountain Poultry
Additional comments:
Process wastewater is generated from the meat cutting and clean-up operations. USDA clean-up requirements require a certain number of gallons/"bird" to be used.
The process wastewater is gravity flowed to a settling pit/wet well where an anti-foam agent is added and then pumped through a rotary screen to remove macro solids. Bags of dry bacteria are added to the wastestream after the screen every morning. Then the water is pumped into an aerated 100,000 gallon EQ tank allowing for some biologic activity. After ~24 hrs detention time, the wastewater is pumped through a series of floc tubes where metered doses of anionic/cationic polyacrylamide polymers, alum and a coagulant are injected prior to being sent to the DAF unit. The floatables are skimmed off the top of the DAF and sent to a 7,500 gallon storage tank. Offal and waste from the cutting and de-boning operations are stored in same storage tank. Five offal trailers are filled per day and sent off-site to be land applied.
Facility also employs an odor neutralizer (Dyna-Mint by Chemsearch) in the pretreatment area which is basically is a hose system with mist sprayers set at different distances misting the pretreatment inside and immediate outside area. Ozonated water sprays over the EQ tank to also help eliminated odor. There was a water leak on one of its outside pipe fittings that was addressed. Treated wastewater from the DAF is sent to the City at ~82,000 gpd. Sampling point consisted of an ISCO auto sampler based on flow from the ISCO bubbler flow meter. There was a notable amount of foam looking down on the flume system. The City rep could easily swipe the foam downstream to clear the bubble system for an accurate flow. And the IU rep indicated with a small ruler how he checked trapezoid flume flow against their auto flow meter. IU rep was very open explaining their treatment system and the City rep was very familiar with the entire plant's operations.

Visit conducted by: Gilliam/Burns/Roth Date: 11/5/14

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT

Control Authority: City of Rogers NPDES #: AR0043397

Name, address and phone number of industry:
Tysons of Rogers, 212 East Elm Street, 479.636.1620
Type of industry: poultry further processing
Date/Time of visit: 11/5/14 / 1:20 p.m.
Industry contacts: Wylie Luther, WW Mgr. / Mark Dooley, Complex Env. Mgr. / Richard King, WW Operator

	Yes	No	N/A
1. Significant industrial user?	✓		
2. Classified correctly?	✓		
3. Pretreatment equipment or procedures?	✓		
4. Pretreatment equipment maintained and operational?	✓		
5. Hazardous waste generated or stored?	✓		
6. Proper solid waste disposal?	✓		
7. Solvent management/TTO control?			✓
8. Suitable sampling location?	✓		
9. Appropriate self-monitoring procedures/equipment?	✓		
10. Adequate spill prevention and control?	✓		
11. Industrial familiar with limits and requirements?	✓		
12. Pollution Prevention activity	✓		

Additional comments:
Facility receives raw chicken quartered thighs, leg quarters and white meat ("flat pack") from a sister facility. The "quarters" are mechanically skinned. Most of the de-boned chicken is vacuum tumble marinated. Some goes directly to pack-out. The "parts" are individually quick frozen, packaged and ready for distribution. The "flat pack" pieces are ready for packaging. Two shifts de-bone and marinate while the graveyard shift conducts the sanitation/disinfection. Sanitation and clean-up counts for ~1/2 of their 24 hr flow of their ~85,000 gpd discharge to the City. Disinfectant and clean-up chems include chlorine, sodium hypochlorite and quaternary ammonia.

Visit conducted by: Gilliam/Burns/Roth Date: 11/5/14

Allen Gilliam

(signature of auditor conducting visit)

PRETREATMENT AUDIT
(MUNICIPAL POLLUTION PREVENTION ASSESSMENT)
INDUSTRIAL SITE VISIT (CONTINUED)

Control Authority: City of Rogers NPDES #: AR0043397
Industry name: Tysons of Rogers
Additional comments:
Bones and scrap meat from this process area are sent to the Scranton Foods offal trailer which is used in premium dog food. Wastewater from the process area is sent through two "Sweco" rotating screens which remove the smaller parts of the chicken offal. The offal is then conveyed to two holding tanks which in turn are trucked to a rendering plant. The screened wastewater is then sent to an below ground "wet well". From the wet well, wastewater is pumped to the 1st of two DAF units where anionic/cationic/coagulants are added. Its "sludge" is mechanically scraped off the top and pumped to the a sludge decant/holding tank. From the 1st DAF unit, the wastewater is fed to the ~300,000 gallon aerated EQ tank with ~12 hours detention time. When the facility is ready to discharge to the City, wastewater from the EQ tank is sent to the 2nd DAF unit where more polymers, coagulants and alum are added with its sludge also scraped off the top into another sludge decant/holding tank. Its effluent is considered final treatment and is discharged to the City.
Records are kept on how many offal and sludge loads went out and how much sludge was collected that day.
Orderly chemical storage areas were seen throughout.
There was some concern discussed about the facility's sample strainer being left in the sampling weir for extended periods of time (even when not sampling).

Visit conducted by: Gilliam/Burns/Roth Date: 11/5/14

Allen L. Gilliam

(signature of auditor conducting visit)

Attachment A-1

ROGERS POLLUTION CONTROL FACILITY

"Serving Rogers - Protecting Our Environment"

Liquid Waste Transport Permit

Permit No. ROG212

In accordance with all terms and conditions of the City of Rogers Code, Chapter 54, Article IV, Division 5. Liquid Wastes,

Arkansas Portable Toilet Rentals, Inc.

Is hereby authorized to operate the following approved vehicle: VIN# 1HTMMAAL65H106677 – 2005 International 4300 DT466 – white truck with 1500 gallon tank (1000 gallon waste/500 gallon fresh), for collection within Rogers' service area, for transportation of portable toilet waste over the streets of Rogers and for disposal at a site approved to receive portable toilet waste.

This permit is granted in accordance with the application approved and filed with the City in conformity with conditions and requirements set forth in the City of Rogers Code. The transporter upon delivery of the waste to the disposer shall inform the disposer of the nature of the waste. Failure to comply with the conditions of this permit, including but not limited to failure to notify the disposer of the presence of hazardous or prohibited waste, shall constitute a violation of the permit and shall be grounds for administrative action, or enforcement proceedings.

This permit is effective for the next 18 months and shall expire December 31st, 2015.

All loads brought to be disposed at the Rogers Pollution Control Facility by this vehicle will be charged a fee of $75 per 1000 gallons of waste.

Paul N Burns

Control Authority
Paul N. Burns
Pretreatment Coordinator

06/16/2014
Date

4300 RAINBOW ROAD / ROGERS, ARKANSAS 72758-1440 / 479-273-7378 / FAX 479-273-7627

ROGERS POLLUTION CONTROL FACILITY

"Serving Rogers - Protecting Our Environment"

Re: Liquid Waste Transport Permit ROG212 Verification

In accordance with all terms and conditions of the City of Rogers Code, Chapter 54, Article IV, Division 5. Liquid Wastes, **Arkansas Portable Toilet Rentals, Inc.**, is hereby authorized to operate the following permitted vehicle:

VIN# 12NPLHD6X07M698388 – 2007 Peterbilt 335 – ROG212 –
Black & Silver truck with 1500 gallon tank (1000 gallon waste/500 gallon fresh)

for collection within Rogers' service area, for transportation portable toilet waste over the streets of Rogers and for disposal at a site approved to receive portable toilet waste. This authorization is granted in accordance with the application approved and filed with the City and expires December 31st, 2015. The approved disposal site within the city of Rogers is the Rogers Pollution Control Facility.

Paul N Burns

Control Authority
Paul N. Burns
Pretreatment Coordinator

06/16/2014
Date

A-16

4300 RAINBOW ROAD / ROGERS, ARKANSAS 72758-1440 / 479-273-7378 / FAX 479-273-7627

RENEWAL APPLICATION FOR INDUSTRIAL USER DISCHARGE PERMIT

City of Rogers, Rogers Water Utilities, Arkansas

SECTION 1

COMPANY INFORMATION

Legal Business Name	**Ozark Mountain Poultry**		
Facility Doing Business As	**Ozark Mountain Poultry**		
Location Address	**750 W. Easy Street Rogers, Arkansas 72757**		
Mailing Address	**PO Box 2440 Rogers Arkansas 72757**		
Years at Present Location	**11**		
Authorized Official	**Mike Spinks**		
Title	**Vice President of Operations**		
Phone	**479-633-8600 ext 4230**	Fax	**479-633-8801**
E-mail Address	**Mspinks@ompfoods.com**		
Contact Representative(s)	**Tommy Lewis**		**Edward "Chip" Kinion**
Title	**Maintenance Manager**		**Wastewater / Maintenance Tech**
Phone	**479-633-8600 ext 4264**		**479-633-8600 ext 4264**
E-mail Address	**Tlewis@ompfoods.com**		
Type of Business	**Poultry Deboning / Packaging**		
NAIC Code(s)			
Permit Number	**10-OMP**	Issue Date **01/01/10**	Exp. Date **12/31/12**
Categorical Classification	Industrial Discharge		
Plans	TOMP	Last Revision Date	
	Slug Control	Last Revision Date	March 29, 2012
	P2	Last Revision Date	March 29, 2012
	WC/WM	Last Revision Date	
# of Employees	515	Hours of Operation	24
# of Shifts	3	Work days/week	6
Production days per year	300		

SECTION 2
NATURE OF OPERATION

List raw materials **Chicken Whole Legs**
Chicken Thighs
Chicken Front Halves
Chicken Whole Birds

List Chemicals used
(or attach list) **See Attached MSDS Information Sheets**

Provide detailed description of process **Product Deboning and Packaging**

Raw poultry product is delivered by refrigerated trucks to the facility. Upon arrival it is distributed to the Proper area of the facility for the deboning process. Whole birds are hung on the wholebird processing Line to be cut into front and back portions, fronts proceed to cone lines, back halves or saddles are further Processed into whole legs sent to leg deboning or leg quarters or can be cut into drum & thighs and package As required by customers orders.

Production data – circle units/day, kg/day, Mlbs/day):

Process	Poultry Deboning	Production Rate	260000	days/yr	day
Process		Production Rate		days/yr	
Process		Production Rate		days/yr	
Process		Production Rate		days/yr	

Provide description of production trends over **the last** 12 months and process changes that occurred:

Over the last twelve months our production trends have changed from primarily co-packing product for Other facilities to processing our own products for retail and institutional use. Co-packing of other product Is no longer our primary business.

Provide description of projected production trends over **the next** 12 months and plans to change processes:

No Changes to Production trends are expected over the next 12 months

SECTION 3
WATER USAGE AND WASTEWATER FLOWS

Water consumption in million gallons: Yearly Total **21.996831**

Maximum per month **2.276546** Minimum per Month **1.533336**

Number of connections to city sewer: Process Only ☐ Sanitary Only ☐ Combined ☑

Regulated monitoring site contains: ☑ Process Only ☐ Combined Wastestreams

Individual process wastewater flows generated in gallons per production day (GPD). indicate estimated (E) or measured (M):

Process Description	Avg GPD	Max GPD	E / M	Type of Discharge (Batch, Continuous, None)	Avg. Discharge Days per Month
Wastewater Pre-Treatment	**87000**	**99000**	M	Continuous	25
Flow Totals	**87000**	**99000**			

Other wastwater flows:

Non Process Description	Avg GPD	Max GPD	E / M	Type of Discharge (Batch, Continuous, None)	Avg. Discharge Days per Month
Cooling Water (NonContact)				**None**	**0**
Cooling Tower Bleed (NonContact)				**None**	**0**
Boiler Blowdown				**None**	**0**
DI or RO backwash				**None**	**0**
Sanitary	3990	5000	E	**Batch**	**22**
Other	3000	5000	E	**Continuous**	**25**
Flow Totals	6990	10000			

Non-sewered flows/water losses:

Non-Sewered Description	Avg GPD	Max GPD	E / M	Type of Discharge (Batch, Continuous, None)	Avg. Discharge Days per Month
Water Losses Evaporation	500	500	E	**Continuous**	0
Water Losses Irrigation	0	0	E	**None**	**0**
Water Loss to Product	0	0	E	**None**	**0**
Other	0	0	E	**None**	**0**
Flow Totals	500	500			

Net total discharged to city of rogers sewer system per production day (GPD):

Average 86400 **Maximum** 103990

A-2c

Facility discharge flow measurement devices:

Flume Type	Tracom trapazoid flume	Flow Meter	ISCO 4230 bubble flow meter
Flume Size	LG60V	Auto-Sampler	ISCO 3710 auto sampler

SECTION 4
SPILL PREVENTION

Has this facility experienced a spill or slug discharge into the sanitary sewer or storm drain? **No**

If so, describe the incident (when, what was spilled, amount, cause, response, actions taken to prevent)

Does the facility still have the potential to have a slug discharge? ☐ Yes ☑ No If yes, describe

Due to the configuration of our wastewater system it is virtually impossible to have a slug discharge from Our system, all wastewater must travel through our pretreatment system before it can have a conduit to Enter the discharge stream.

SECTION 5
POLLUTION PREVENTION

Describe the best management practices this facility uses to prevent or reduce pollution:

Obsolete packaging (cardboard boxes) is taken to Rogers Youth Center for recycling reducing landfill.

Waste oil is taken to Speedy Lube or Oreilly Automotive for recycling

Aluminum cans are removed from break room receptacles by janitorial staff for recycling at youth center.

Chemicals and used lamps recycling is scheduled for pick up with Mid America Environmental

Recyclable cardboard and plastics are picked up by Service Recycling of Joplin Mo. Reducing landfill

SECTION 6

ENVIRONMENTAL MANAGEMENT SYSTEM

Date last revised:

Describe the environmental performance goals and if an environmental management system is in place

SECTION 7

PRETREATMENT SYSTEM

Describe the Pretreatment System. This includes pH adjustment, process chemical and rinse water recovery, waste stream segregation, solids sedimentation, sludge dewatering, etc.

Wastewater generated from the facility is processed through an IPEC # RSS2536 Rotary Screen to remove Solids from the water before entering the 1000000 EQ Tank. Water from the EQ tank is then returned to Our wastewater building for the pre-treatment process. Water from the EQ is processed through a flock Tube and DAF unit to remove remaining solids from water. Sludge removed is pumped to a holding tank for Removal by Terra Renewal Services it is then trucked to proper location to be land applied as fertilizer.

Provide detailed description of all waste hauled offsite including both hazardous and non-hazardous waste hauled offsite. Include name, description, amount, frequency of disposal, and disposal site.

30000 gallons of sludge generated from wastewater pre-treatment is removed by Terra Renewal Services Weekly it is then land applied at their disposal location. (5 times weekly 6000 gallons each)

General solid waste are disposed of at landfill by Allied Waste (Trash Compactor Changed 5 times a week)

Waste oil is recycled at speedy lube or oreilly auto parts (less than 75gal year)

SECTION 8

MONITORING DATA & SCHEMATICS

Provide: Discharge summary report. Include the analytical test results and corresponding flow readings reported over the past 12 months.

Provide: Updated facility plan with schematic flow diagram of process activities, wastestreams, and sewer connections. Use multiple pages if necessary.

I am hereby applying for a City of Rogers Industrial User Discharge Permit to discharge waste from the above-mentioned facility to the City of Roger's wastewater treatment system. I hereby certify that the information submitted in the application is accurate to the best of my knowledge.

Authorized Official Date

10-5-12

Submit to: Control Authority
Rogers Pollution Control Facility
4300 Rainbow Road, Rogers, AR 72758-1440
Tel. 479-273-7378 Fax 479-273-7627
paulburns@rwu.org

Attachment A-3

ROGERS POLLUTION CONTROL FACILITY

"Serving Rogers - Protecting Our Environment"

Mr. Michael Spinks
Vice President of Operations
Ozark Mountain Poultry
P.O. Box 2440
Rogers, Arkansas 72757

RE: Issuance of Industrial User Permit to **Ozark Mountain Poultry** by the City of Rogers, AR.
Permit No.: 13-OMP

Dear Mr. Spinks:

Your application for an industrial user pretreatment permit renewal has been reviewed and processed in accordance with the City of Rogers, AR, Code of Ordinances §54-563 (2004).

The enclosed permit number **13-OMP** covers the wastewater discharged from the facility at

OZARK MOUNTAIN POULTRY
750 West Easy Street
Rogers, Arkansas 72756

into the City sewer collection system. All discharges from this facility and actions and reports relating to them must be in accordance with the terms and conditions of this permit.

If you wish to appeal or challenge any conditions imposed in this permit, you must file a petition for modification or reissuance of this permit in accordance with the requirements of the City of Rogers, AR, Code of Ordinances §54-559 (2004) within 30 days of your receipt of this correspondence. Failure to petition for reconsideration of the permit within the allotted time is deemed a waiver by the permittee of its right to challenge the terms of this permit.

Issued and signed this 28th day of December 2012 by:

Paul N Burns

Control Authority
Paul N Burns
Pretreatment Coordinator

ROGERS POLLUTION CONTROL FACILITY

"Serving Rogers - Protecting Our Environment"

Permit No.: 13-0MP

INDUSTRIAL USER DISCHARGE PERMIT

In accordance with the provisions and conditions of the City of Rogers, AR, Code of Ordinances Article V of Chapter 54, and also any applicable provisions of Federal or State laws or regulations,

OZARK MOUNTAIN POULTRY
750 West Easy Street
Rogers, Arkansas 72756

is hereby authorized by the City of Rogers, Arkansas, to discharge industrial wastewaters from the above-identified facility and through the outfalls identified herein into the City sewer collection system in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any and or all applicable pretreatment regulations, standards, or requirements under local, state, and Federal laws, including any such regulations, standards, requirements, or laws that become effective during the term of this permit.

All discharges authorized herein shall be in accordance with the effluent limitations, monitoring requirements, terms and conditions set forth in Parts I through V of this permit. Non compliance with any term or condition of this permit will constitute a violation of the City of Rogers sewer and pretreatment ordinances.

This permit shall become effective on **January 1, 2013**. This permit and the authorization to discharge shall expire at midnight on **December 31, 2016**.

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of the City of Rogers, AR, Code of Ordinances §54-563 (2004), a minimum of 90 days prior to the expiration date.

Issued and signed this 28th day of December 2012 by:

Paul N Burns

Control Authority
Paul N Burns
Pretreatment Coordinator

A-36

4300 RAINBOW ROAD / ROGERS, ARKANSAS 72758-1440 / 479-273-7378 / FAX 479-273-7627

PART I PERMIT REQUIREMENTS

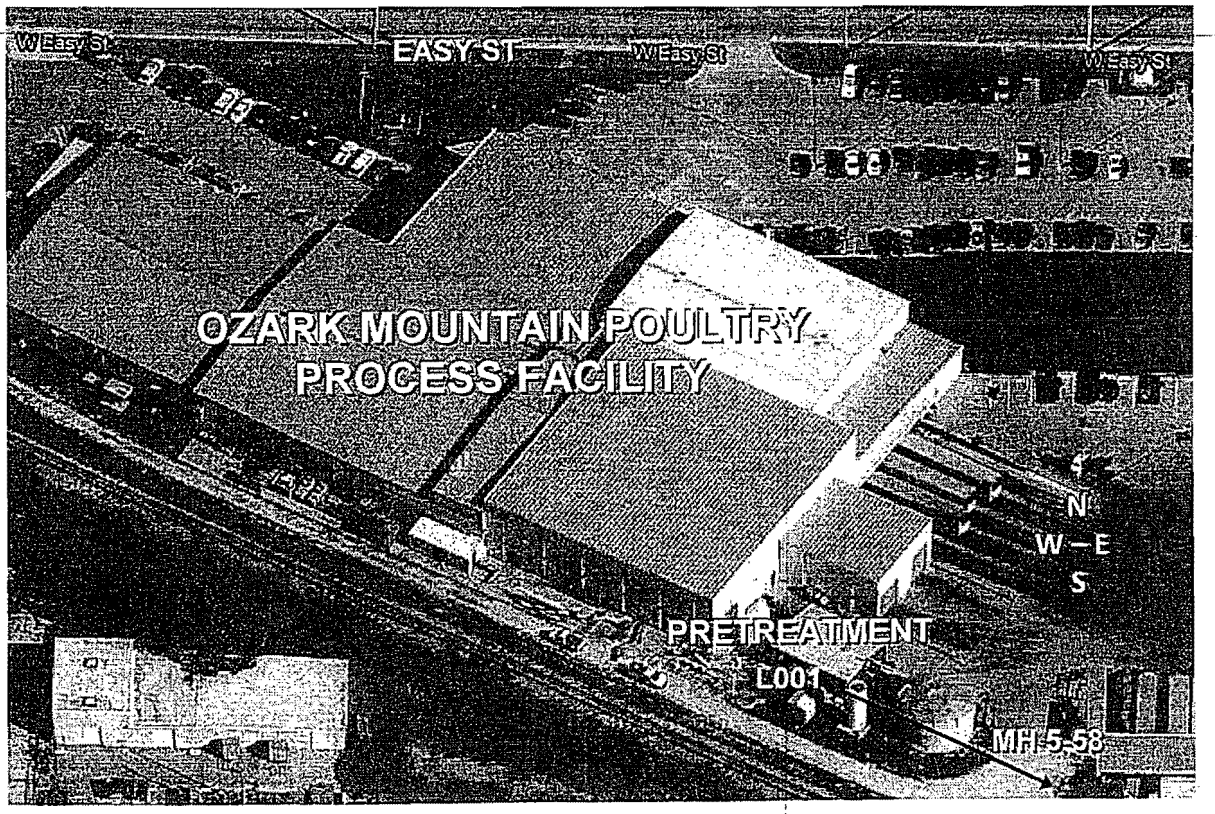
SECTION A. EFFLUENT LIMITATIONS

1. Description of Wastestream Locations

During the period of January 1, 2013 through December 31, 2016, the permittee is authorized to discharge process wastewater to the City of Rogers wastewater treatment system from the following locations:

Sanitary There are two sanitary-only waste lines that discharge from the permitted facility directly into the city collection system. Both sanitary waste lines are connected to the city collection system east of the facility and downstream of the treated process effluent.

Location 001 Location 001 is a monitoring site flume located outside the southeast corner of the pretreatment facility. The discharge shall consist of the facility combined process generated wastestreams from the poultry processing operation after pretreatment. This wastestream joins the city collection system at manhole MH 5-58.



A-3c

2. Effluent Limitations and Monitoring Requirements

The facility is considered non-categorical Meat and Poultry Further Processing new source subject to the pretreatment standards for new sources (PSNS) at Title 40 CFR Part 432.126. There are no categorical limits under this subpart.

Sanitary – During the period of January 1, 2013 through December 31, 2016, the two sanitary wastestreams shall consist only of combined facility sanitary wastewater. The quality of the effluent discharged from these locations shall comply with 40 CFR Part 403 General Pretreatment Regulations and with all applicable regulations and standards as specified in the City Code with no regular monitoring requirement. The permittee may be asked to monitor at this location to verify discharge and pollutant loading as necessary.

Location 001 – During the period of January 1, 2013 through December 31, 2016, the quality of the effluent discharged from Location 001 shall not exceed the following effluent limitations. In addition, the discharge shall comply with 40 CFR Part 403 General Pretreatment Regulations and with all applicable regulations and standards contained in the City Code. Effluent from this location shall consist of only combined process generated wastewater. Any single analysis and/or measurement beyond the specified pH range shall be considered a violation of the conditions of this permit. All loading limits are calculated based on a daily full production flow of **0.082000** MGD (75th Percentile). The monthly average loading limits for CBOD5, TSS, Oil/Grease, and TP are calculated local limits based on protecting the quality of the POTW's effluent, managing the electrical and sludge handling costs of the POTW, and preventing pollutant slugs to the POTW. Concentration limits will only be used if there is evidence that the flow data supplied by the permittee is significantly inaccurate.

	Discharge Limits Est. Monthly Average Concentration[1]		Discharge Limits Monthly Average[2] Loading		Monitoring Requirements	
	mg/L	TRC mg/L	lbs/day	TRC[3] lbs/day	Frequency	Sample Type
$CBOD_5$	480	670	328	460	2/Month[4]	24-hour FPC[5]
TSS	300	420	205	287	2/Month[4]	24-hour FPC[5]
Oil / Grease	100	140	68	96	1/Month	Discrete Grab[6]
Phosphorus (T)	15.7	18.8	10.7	12.9	2/Month[4]	24-hour FPC[5]
Ammonia	Report	N/A	Report	N/A	1/Month	24-hour FPC[5]
pH	5.0 Min	12.0 Max			2/Month[4]	pH Grab[7]
Flow (MGD)	Check calibration weekly and report daily flows					Indicate/Totalize

[1] **Est. Monthly Average Concentration** means the highest allowable average concentration of all daily discharges determined during the calendar month. Compliance with the monthly average limits is required regardless of the number of samples analyzed. CBOD and TSS concentration limits are rounded to 2 significant figures. The concentration limit will only be used in place of the loading limit when it has been determined that the flow used to calculate the loading is significantly inaccurate.

[2] **Monthly Average Loading** means the highest allowable average loading of all daily discharges determined during the calendar month. Compliance with the monthly average limits is required regardless of the number of samples analyzed.

[3] **TRC** (Technical Review Criteria) means a numeric threshold of 20% above daily and/or monthly limits (40% for CBOD, TSS, fats, oil and grease). pH is excluded. The TRC limit is used to define a subcategory of Significant Non-Compliance (SNC). A SNC violation is determined where 33 percent or more of all of the measurements taken during a six-month period equal or exceed the product of the TRC limit.

[4] **2/Month** is defined as at least two samples collected each month. The sample must represent a normal process discharge day. Sampling 1/week during the first half of the month is required. Otherwise the required monitoring events must be at least three days apart from one another. The permittee may elect to conduct additional monitoring during the month to verify compliance or aid process control.

[5] **24-hour FPC** sample means a minimum of 12 samples collected at equal flow intervals (e.g., every 2,000 gallons) over a 24-hour period and combined.

[6] **Discrete Grab** sample means a minimum of 4 representative samples collected equally over the monitoring period, each one individually preserved at the time of collection and composited afterwards by the lab for a single result. However, the Control Authority has determined for O/G, that 2 representative samples collected and preserved are representative of the daily operation.

[7] **pH Grab** sample means an individual sample collected without regard for flow and time at a representative point in the discharge stream. A duplicate sample should be collected within 5 minutes and both grab samples must be analyzed within 15 minutes of sample collection. The Facility is required to collect 3 sets of duplicates over the 24 hour monitoring period.

3. Additional Monitoring Requirements

The permittee shall be required by the Control Authority to perform additional monitoring as necessary to:

(a) Verify the absence of specific pollutants,
(b) Determine the toxicity of the discharge through biomonitoring testing, and
(c) Identify and assess uncontrolled discharge measures and pollution prevention options.

SECTION B. MONITORING REPORT REQUIREMENTS

1. Discharge Monitoring Report

All monitoring results obtained during the calendar month shall be summarized and reported on a discharge monitoring report (DMR) provided by the Control Authority. The DMR and copy of all analytical results shall be submitted to the Control Authority on or before the 15th of the month following the monitoring period. The DMR shall indicate the nature and concentration of all pollutants in the effluent that are regulated by the limits set forth in Part I Section A.2, and include measured daily flows and total monthly flows. DMRs shall be submitted even when no discharge occurs during the monitoring period. The DMR shall contain the following:

(a) Industry name, address and contact representative;
(b) Monitoring period;
(c) Daily and monthly average pollutant concentration and loading results;

(d) Total, average and daily flow readings;
(e) Signatory certification statement; and
(f) Signature of authorized representative.

The DMR shall be mailed, faxed, or emailed to:

Control Authority
4300 Rainbow Road
Rogers, Arkansas 72758-1440
479-273-7627 (fax)
paulburns@rwu.org

If, during any period, the permittee fails to comply with permit requirements and limitations, the permittee shall submit to the Control Authority as part of the DMR an explanation of the noncompliance, any known or suspected cause, and actions the permittee has taken to prevent further occurrences.

SECTION C. SPECIAL REQUIREMENTS

1. Phosphorus Reduction

The permittee is required to implement and maintain process control and pretreatment initiatives that will ensure consistent effluent phosphorus concentrations below permit monthly average limits. The permittee is encouraged to develop a pollution prevention management plan that will incorporate best management practices (BMPs) and source reduction strategies that will significantly decrease phosphorus loading into the sanitary sewer system. Chemical precipitation through the use of an aluminum or iron based coagulant may be necessary.

2. Offensive Odor Reduction Plan

The permittee is required to implement and maintain process control initiatives that will ensure offensive odors are reduced as much as possible. The permittee is encouraged to develop an offensive odor management plan that will incorporate best management practices (BMPs) that will significantly decrease offensive odors. It is recommended that the permittee submit a summary of the reduction plan to the Control Authority prior to April 1st, 2013.

SECTION D. COMPLIANCE SCHEDULE

1. Compliance Schedule Requirements

The permittee shall achieve compliance with the effluent limitations specified for discharge in accordance with the following schedule:

(a) Comply with the effluent limitations by January 1, 2013.
(b) Submit revisions or a statement of review of the slug control plan and pollution prevention plan by April 1st 2013.
(c) Submit revisions or a statement of review of the offensive odor management plan by April 1st 2013.

2.0 Compliance Schedule Reporting

The permittee shall submit by February 15, 2013 along with the January 2013 DMR, to the Control Authority a progress report including, at a minimum, whether or not it complied with the new permit limitations. If any of the above compliance requirements cannot be met then the permittee shall submit a letter with date on which it expects to comply with the increment of progress, the reasons for delay, and the steps being taken to return the project to the schedule established.

PART II STANDARD CONDITIONS

SECTION A. GENERAL CONDITIONS

1. Severability

The provisions of this permit are severable and, if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

2. Duty to Comply

The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit shall be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatement.

3. Duty to Mitigate

The permittee shall take all reasonable steps to minimize or correct any adverse impact to the public treatment plant or the environment resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

4. Permit Termination

This permit may be terminated for the following reasons:

(a) Creates a dangerous situation threatening human health, the environment or publicly owned treatment works (POTW);
(b) Exceeds discharge limits and results in damage to the environment;
(c) Causes the POTW to violate its NPDES permit;
(d) Causes interference or pass through or damage to human health or the POTW;
(e) Fails to meet effluent limitations and/or violates any term or permit conditions;
(f) Fails to notify the Control Authority of violations or discharges that result in damage;
(g) Fails to accurately report the discharge constituents and characteristics;
(h) Obtains this permit by misrepresentation or failure to disclose fully all relevant facts;
(i) Fails to report significant changes in operation or discharge volume or characteristics;
(j) Falsifies self-monitoring reports;
(k) Tampers with monitoring equipment;
(l) Refuses to allow timely access to the facility premises and records;
(m) Fails to meet compliance schedules; and
(n) Fails to pay fines and/or sewer charges.

5. Permit Modification

This permit may be modified for good causes including, but not limited to, the following:

(a) To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;
(b) Substantial alterations or additions to the discharger's operation processes, or discharge volume or character which were not considered in drafting the effective permit;
(c) A change in any condition in either the industrial user or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
(d) Information indicating that the permitted discharge poses a threat to the Control Authority's collection and treatment systems, POTW personnel or the receiving waters;
(e) Violation of any terms or conditions of the permit;
(f) Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
(g) Revision of or variance from such categorical standards pursuant to 40 CFR 403.13;
(h) To correct typographical or other errors in the permit;
(i) To reflect transfer of the facility ownership and/or operation to a new owner/operator;
(j) Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations.

The filing of a request by the permittee for a permit modification, revocation or reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

6. Permit Appeals

The permittee may petition to appeal the terms of this permit within 30 days of the notice. This petition must be in writing; failure to submit a petition for review shall be deemed to be a waiver of the appeal. In its petition, the permittee must indicate the permit provisions objected to, the reasons for this objection, and the alternative conditions, if any, it seeks to be placed in the permit.

The effectiveness of this permit shall not be stayed, pending reconsideration by the Rogers' Waterworks and Sewer Commission. If, after considering the petition and any arguments put forth by the Superintendent, the Waterworks and Sewer Commission determines that reconsideration is proper, it shall remand the permit back to the Superintendent for reissuance. Those permit provisions being reconsidered by the Superintendent shall be stayed pending reissuance.

A Waterworks and Sewer Commission's decision not to reconsider a final permit shall be considered final administrative action for purposes of judicial review. The permittee seeking judicial review of the Waterworks and Sewer Commission's final action must do so by filing a complaint with the court of appropriate jurisdiction.

7. Limitation on Permit Transfer

Permits may be reassigned or transferred to a new owner and/or operator with prior approval of the Control Authority:

(a) The permittee must give at least 30 days advance notice to the Control Authority.
(b) The notice must include a written certification by the new owner which:
    1) States that the new owner has no immediate intent to change the facility's operations and processes;
    2) Identifies the specific date on which the transfer is to occur;
    3) Acknowledges full responsibility for complying with the existing permit.

The permittee must provide advance notice to the Control Authority of the transfer of a permitted facility.

8. Duty to Reapply

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must submit an application for a new permit at least 90 days before the expiration date of this permit.

9. Continuation of Expired Permits

An expired permit will continue to be effective and enforceable until the permit is reissued if:

(a) The permittee has submitted a complete permit application at least 90 days prior to the expiration date of the user's existing permit.
(b) The failure to reissue the permit, prior to expiration of the previous permit, is not due to any act or failure to act on the part of the permittee.

10. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any violation of Federal, State or local laws or regulations.

11. Dilution

The permittee shall not increase the use of potable or process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

12. Compliance with Applicable Pretreatment Standards and Requirements

Compliance with this permit does not relieve the permittee from its obligation regarding compliance with any and all applicable local, State and Federal pretreatment standards and requirements including any such standards or requirements that may become effective during the term of this permit.

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all treatment operations and systems which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes but is not limited to: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. The operating staff shall be qualified to carry out operation, maintenance and testing functions required to insure compliance with the conditions of this permit. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of this permit.

2. Duty to Halt or Reduce Activity

Upon reduction of efficiency of operation, or loss or failure of all or part of the treatment system, the permittee shall, to the extent necessary to maintain compliance with this permit, control production or discharges or both until operation of the treatment is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Bypass of Treatment System

Bypass, or the intentional diversion of wastestreams from any portion of the permittee's treatment system, is prohibited, unless:

(a) Bypass is unavoidable to prevent loss of life, personal injury, or severe property damage.
(b) There is no feasible alternative to the bypass, such as the use of auxiliary treatment operations, retention of untreated wastes, or maintenance during normal periods of equipment downtime.
(c) The bypass does not cause effluent limitations to be exceeded, but only if it is also for essential maintenance to assure efficient operation.
(d) The permittee submits one of the required bypass notices:
    1) Anticipated Notice. If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, at least ten days before the date of the bypass, to the Control Authority. The Control Authority may approve an anticipated bypass, after considering the adverse effects, if the Control Authority determines that the permittee will meet the three conditions listed in Section B.3. (a), (b) or (c).
    2) Unanticipated Notice. A permittee shall submit oral notice of an unanticipated bypass that exceeds applicable pretreatment standards to the Control Authority within 24 hours from the time the permittee becomes aware of the bypass. A written submission shall also be submitted within 5 days of the time the permittee becomes aware of the bypass. The Control Authority may waive the written notice on a case-by-case basis if the oral notice has been received within 24 hours.

(e) All notices, whether for anticipated or unanticipated bypasses, shall contain:
1) A description of the bypass and its cause;
2) The duration of the bypass, including exact dates and times;
3) If the bypass has not been corrected, the anticipated time it is expected to continue;
4) Steps taken or planned to reduce, eliminate and prevent reoccurrences of the bypass.

4. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with Section 405 of the Clean Water Act, Subtitles C and D of the Resource Conservation and Recovery Act (RCRA), and any applicable state and local regulation.

5. Power Failure

The permittee is responsible for maintaining adequate safeguards to prevent the discharge of untreated or inadequately treated wastes during electrical power failure either by means of alternate power sources, standby generators, or retention of inadequately treated effluent.

SECTION C. MONITORING AND RECORDS

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge during the entire monitoring period. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other wastestream, body of water, or substance. Monitoring points shall not be changed without notification to and the approval of the Control Authority. The permittee shall ensure that all equipment used for sampling and analysis is routinely calibrated, inspected and maintained to ensure accuracy of measurement.

2. Flow Measurements

Appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitoring discharges. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of the device. Devices shall be capable of measuring flows with a maximum deviation of less than $\pm$10% from true discharge rates throughout the range of expected discharge volumes. The discharge flow measurement device that activates the autosampler shall be installed at the monitoring point of discharge and must be calibrated by a certified technician at least yearly. In-house calibration must be performed on both devices at a frequency to verify accuracy and reliability of measurements. The permittee is responsible for ensuring that each daily flow measurement is representative of the discharge during that period. Comparison of flow measurements from each device is required to ensure accuracy and reliability of discharge measurements. All flow readings and calibration records must be maintained for a minimum of 3 years.

3. Monitoring and Analysis Procedures

All monitoring and analysis required by this permit shall be performed in accordance with the techniques and test procedures prescribed in 40 CFR Part 136 and amendments thereto, otherwise approved by EPA. An adequate analytical quality control program, including the analysis of sufficient standards, spikes and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the permittee or designated commercial laboratory. Where analytically applicable, spikes and duplicate samples are to be analyzed on at least 10% of the samples. Except for pH, all analysis shall be performed by a laboratory that is currently certified by the State of Arkansas for the regulated parameter. The permittee may analyze and report pH readings in-house provided the test procedures prescribed in 40 CFR 136 are followed and a record of all calibrations and analysis are maintained for a minimum of 3 years.

4. Additional Monitoring by the Permittee

If the permittee monitors any pollutant more frequently than required by this permit, using test procedures approved under 40 CFR Part 136 or amendments thereto, all monitoring results for regulated parameters reported at the point of compliance shall be included in any calculations of actual daily maximum or monthly average pollutant discharge and the results shall be reported in the DMR.

5. Sample Collection

Samples for oil/grease, temperature, pH, cyanide, phenols, and volatile organic chemicals must be obtained using grab collection techniques. The permittee must collect all other wastewater samples using flow proportional composite collection techniques. In the event flow proportional sampling is not feasible, the Control Authority may authorize the use of time proportional sampling or through a minimum of four grab samples where the permittee demonstrates that this will provide a representative sample of the effluent being discharged.

6. Sampling and Analysis Record Contents

Records of sampling and analyses shall include:

(a) The date, exact place, time, and methods of sampling or measurements and sample preservation techniques or procedures;
(b) The individual(s) who performed the sampling or measurement;
(c) The date(s) analyses were performed;
(d) The individual(s) who performed the analyses;
(e) The analytical techniques or methods used; and
(f) The results of all required analyses.

7. Retention of Records

(a) The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the

sample, measurement, report, or application. This period shall be extended by request of the Control Authority at any time. The permittee shall make such records available for inspection and copying by the Control Authority.

(b) All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the Control Authority shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

8. Falsifying Information

Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, is a crime and may result in the imposition of criminal sanctions and/or civil penalties. Falsification of information shall be punished by a fine of not less than $100.00 nor more than $1000.00 for each offense.

9. Inspection and Entry

The permittee shall allow the Control Authority and/or their authorized representatives, to:

(a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
(c) Inspect at reasonable times any facilities, monitoring equipment, control equipment, practices, or operations regulated or required under this permit;
(d) Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location; and
(e) Inspect any production, manufacturing, fabrication, or storage area where pollutants, regulated under the permit, could originate.

The permittee shall not knowingly cause an unreasonable delay in allowing the Control Authority or their authorized representative access to the industrial user's premises. The permittee shall make necessary arrangements so that upon presentation of suitable identification the Control Authority will be permitted entry without delay.

If the Control Authority is refused access to a building, structure or property, and if the Control Authority has demonstrated probable cause to believe that there may be a violation of this permit or that there is a need to inspect to verify compliance with this permit, or to protect the overall public health, safety and welfare of the community, then the Control Authority may seek issuance of a search warrant from a court with appropriate jurisdiction. In the event of an extreme emergency affecting public health and safety, inspections shall be made without the issuance of a warrant.

The permittee must take precautions to ensure the safety of Control Authority personnel while on the permittees' premises. The industrial user at the written or verbal request of the Control Authority shall promptly remove any temporary or permanent obstruction to safe and easy access to the industrial facility. The costs of clearing such access shall be borne by the industrial user.

No person shall maliciously, willfully, or negligently break, damage, destroy, uncover, deface, tamper with, or prevent access to any structure, appurtenance or equipment, or other part of the Control Authority's property (i.e., automatic samplers and other field equipment). Any person found in violation of this requirement shall be subject to the sanctions set out in the City Ordinance.

SECTION D. ADDITIONAL REPORTING REQUIREMENTS

1. Planned Changes

The permittee shall promptly notify the Control Authority of any facility expansion, production increase, or process modifications that will result in a new or substantial change in the volume, pollutant(s) or nature of the discharge, including the listed or characteristic hazardous wastes for which the permittee has submitted initial notification under 40 CFR 403.12(p). The Control Authority shall be notified within 5 working days after the permittee is aware of the change.

2. Anticipated Noncompliance

The permittee shall give advance notice to the Control Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

3. Accidental Discharge Report

The permittee shall notify the Control Authority immediately upon the occurrence of an accidental discharge of substances prohibited by the city ordinance or any uncontrolled releases or spills that may enter the wastewater collection system. The Control Authority should be notified at any time by telephone at 479-273-7378. The notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The permittee's notification of accidental release in accordance with this section does not relieve the permittee of other reporting requirements that arise under local, state or federal law.

Within 5 days following an accidental discharge, the permittee shall submit to the Control Authority a detailed written report. The report shall specify:

(a) Description of cause of the upset, uncontrolled discharge or accidental discharge, the cause thereof, and the impact on the permittee's compliance status. The description should also include location of discharge, type, concentration and volume of waste.
(b) Duration of noncompliance, including exact dates and times of noncompliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur.
(c) All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, uncontrolled discharge, accidental discharge, or conditions of noncompliance.

4. Operating Upsets

Any permittee that experiences an upset in operations that places the permittee in a temporary state of noncompliance with the provisions of either this permit or with the City Ordinance shall inform the Control Authority within 24 hours of becoming aware of the upset at 479-273-7378.

A written follow-up report of the upset shall be filed by the permittee with the Control Authority within 5 days. The report shall specify:

(a) Description of the upset, the cause(s) thereof and the upset's impact on the permittee's compliance status;

(b) Duration of noncompliance, including exact dates and times of noncompliance, and if not corrected, the anticipated time the noncompliance is expected to continue; and
(c) All steps taken or to be taken to reduce, eliminate and prevent recurrence of such an upset.

The report must also demonstrate that the treatment facility was being operated in a prudent and workmanlike manner. A documented and verified operating upset shall be an affirmative defense to any enforcement actions brought against the permittee for violations attributable to the upset event.

5. Noncompliance Notification

If the results of the permittee's wastewater analysis indicate that a violation of this permit has occurred, the permittee must:

(a) Notify the Control Authority of the violation within 24 hours of becoming aware of the violation;
(b) Submit to the Control Authority as part of the DMR an explanation of the noncompliance, any known or suspected cause, and actions the permittee has taken to prevent further occurrences; and
(c) Repeat the sampling and pollutant analysis and submit, in writing, the results of this repeat analysis within 30 days after becoming aware of the violation.

6. Duty to Provide Information

The permittee shall furnish to the Control Authority within 15 days any information which the Control Authority requests to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also, upon request, furnish to the Control Authority within 30 days copies of all records required by this permit. Information shall be submitted in the form, manner and time frame requested by the Control Authority.

7. Availability of Data and Confidential Information

All information and data obtained from reports, questionnaire, permit application, permits and monitoring programs and from inspection shall be available to the public or any governmental agency without restriction unless the user specifically requests and is able to demonstrate to the

satisfaction of the Control Authority that the release of such information would divulge information, processes, or methods of production entitled to protection as trade secrets of the permittee. Information claimed as confidential must be submitted with the words "confidential business information" stamped on each page. If no claim is made at the time of submission the Control Authority may make the information available to the public without further notice. All effluent data shall be available to the public without restriction.

8. Compliance Schedule

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 15 days following each schedule date. Any reports of noncompliance shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

9. Changes in Discharge of Toxic Substances

The permittee shall notify the Control Authority as soon as the permittee knows or has reason to believe:

(a) That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the "notification levels" described in 40 CFR 122.42 (a)(1).

(b) That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant that is not limited in the permit, if that discharge will exceed the highest of the "notification levels" described in 40 CFR 122.42 (a)(2).

10. Signatory Requirements

All applications, reports, or information submitted to the Control Authority must contain the following certification statement and be signed as required in Sections (a), (b), (c), or (d) below:

> "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

(a) By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer is:

1) A president, secretary, treasurer, or vice-president of the corporation in charge of a principle business function, or any other person who performs similar policy - or decision-making functions for the corporation, or:

2) The manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

(b) By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

(c) By a duly authorized representative of the individual designated in the paragraph (a) or (b) of this section if:

1) The authorization is made in writing by the individual described in paragraph (a) or (b);

2) The authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, superintendent, or position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and

3) the written authorization is submitted to the Control Authority.

(d) If an authorization under paragraph (c) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of paragraph (c) of this section must be submitted to the Control Authority prior to or together with any reports to be signed by an authorized representative.

SECTION E. ENFORCEMENT ACTIONS

The following is a list of enforcement mechanisms sorted from least severe to most severe in accordance with City of Rogers, AR, Code of Ordinances §54-561 to614 (2004). Omission in this section of any enforcement action that is part of the City of Rogers, AR, Code of Ordinances shall not be a bar to taking any other action against the user.

1. Informal Notice or Meeting

An informal notice is a telephone call, e-mail, or reminder letter used to correct minor non-compliance. It is intended to solicit an explanation, suggest the exercise of more due care, and/or notify the violator that subsequent violations of the same type may be dealt with more severely. An informal meeting may be scheduled to discuss the importance of industrial user compliance and to determine the commitment level of the industrial user. Compliance with an informal notice or meeting does not relieve the industrial user of liability for any violation occurring before or after the informal notice or meeting.

2. Notice of Violation

A notice of violation (NOV) is a written notice from the Control Authority to the noncompliant industrial user that a nonsignificant pretreatment violation has occurred. Additional NOV's are

issued each time a violation is observed. An NOV requires the industrial user to submit within 15 days an explanation of the cause, schedule for compliance, and plan to correct and prevent the noncompliance. Submission of the plan and/or compliance with an NOV does not relieve the industrial user of liability for any violations occurring before or after receipt of the NOV.

3. Significant Noncompliance Criteria

An industrial user is in SNC if its violation meets one or more of the following criteria:

(a) Chronic violations of wastewater discharge limits, defined here as those in which 66% or more of wastewater measurements taken during a 6 month period exceed, by any magnitude, a numerical Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR 403.3(1);

(b) Technical Review Criteria (TRC) violations, defined here as those in which 33% or more of wastewater measurements taken for each pollutant parameter during a 6 month period equals or exceeds the product of the numeric Pretreatment Standard or Requirement, including instantaneous limits, as defined by 40 CFR 403.3(1), multiplied by the applicable criteria; 1.4 for BOD, TSS, fats, oils and grease, and 1.2 for all other pollutants except pH.

(c) Any other violation of a Pretreatment Standard or Regulation, as defined by 40 CFR 403.3(l) (daily maximum, long-term average, instantaneous limit, or narrative standard) that the POTW determines has caused, alone or in combination with other discharges, interference or pass through, including endangering the health of POTW personnel or the general public;

(d) Any discharge of pollutants that have caused imminent endangerment to human health, welfare or the environment, or have resulted in the POTWs exercise of its emergency authority to halt or prevent such a discharge;

(e) Failure to meet, within 90 days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance;

(f) Failure to provide within 45 days after the due date, any required reports, including baseline monitoring reports, reports on compliance with categorical pretreatment standard deadlines, periodic self-monitoring reports, and reports on compliance with compliance schedules;

(g) Failure to accurately report noncompliance; or

(h) Any violation, including a violation of best management practices, which the POTW determines will adversely affect the operation or implementation of the pretreatment program.

4. Administrative Orders

Administrative orders (AO's) are enforcement documents, which direct the permittee to undertake or to cease specified activities. AO's are issued in response to repeated NOV's and/or SNC's and may incorporate additional enforcement actions to include compliance schedules, administrative penalties, and termination of discharge. Administrative orders include: Consent Orders, Show Cause Orders, Compliance Orders, Cease and Desist Orders, Administrative Fines, Termination of Discharge, and Emergency Suspension. Circumstances of an industrial user's noncompliance dictate the type of AO and number of AO's needed to achieve compliance. The most severe AO's are:

(a) Administrative Fines - When the control authority finds that a user has violated, or continues to violate, any provision of this article, an industrial user permit or order issued hereunder, or any other pretreatment standard or requirement, the control authority may fine such user in an amount not to exceed $1,000.00 per violation per day. In the case of monthly or other long-term average discharge limits, fines shall be assessed for each day during the period of violation.

(b) Emergency Suspension - Occurs when it is necessary to stop an actual or threatened discharge that reasonably appears to present or cause an imminent or substantial endangerment to the health or welfare of persons, environment, or the POTW. Upon notification of a suspension of its discharge the permittee shall immediately stop or eliminate its contribution. The Control Authority may allow the permittee to recommence its discharge when the user has demonstrated to the satisfaction of the Control Authority that the period of endangerment has passed, unless termination proceedings are initiated against the permittee. A permittee responsible for any discharge presenting imminent endangerment shall submit a detailed written statement, describing the cause(s) of the harmful contribution and the measure(s) taken to prevent any future occurrence, to the Control Authority within 5 days of the occurrence.

(c) Termination of Discharge - In addition to the provisions in Part II, Section A, Item 4 of this permit, any user who violates the following conditions is subject to discharge termination:

1) Violation of industrial user permit conditions;
2) Failure to accurately report the wastewater constituents and characteristics of its discharge;
3) Failure to report significant changes in operations or wastewater volume, constituents, and characteristics prior to discharge;
4) Refusal of reasonable access to the user's premises for the purpose of inspection, monitoring, or sampling; or
5) Violation of the prohibited pretreatment standards in Part III of this permit.

Such user will be notified of the proposed termination of its discharge and be offered an opportunity to Show Cause why the proposed action should not be taken. Exercise of this option by the Control Authority shall not be a bar to, or a prerequisite for, taking any other action against the user.

5. Judicial Enforcement Actions

Judicial enforcement actions are formal judicial processes, either civil or criminal, that are taken against an industrial user who is or continues to be noncompliant. Civil litigation may involve consent decree, injunction, and civil penalties. The criminal judicial enforcement action is criminal prosecution.

(a) Civil Penalty. A monetary fine issued to a noncompliant industrial user that has violated, or continues to violate, any provision of the ordinance, wastewater discharge permit, order, or any other pretreatment standard or requirement. A noncompliant industrial user shall be liable to the City for a maximum civil penalty of up to $1,000 per violation per day. If the violation is a monthly or other long-term average discharge limit, the penalty shall accrue for each day during the period of the violation.

(b) Criminal Prosecution. Prosecution is pursued when the Control Authority has admissible evidence of willfulness, negligence, and/or bad faith effort, which result in noncompliance. Criminal prosecution is necessary when repeated violations, aggravated violations (discharges which endanger the health of the POTW employees), and less formal efforts to restore compliance have failed. Criminal prosecution may be brought prior to, concurrently with, or subsequent to civil litigation. Upon conviction, the individual(s) and/or organization shall be guilty of a misdemeanor, punished by a fine of not more than $1,000 per violation, per day, or imprisoned for not more than 30 days, or both. The permittee may also be subject to sanctions under State and/or Federal law.

6. Supplemental Enforcement Actions

Supplemental enforcement responses are actions taken by the Control Authority to reinforce the compliance obligations of industrial users. Selection of a supplemental enforcement response is determined on an individual basis. Supplemental enforcement responses include: public notices, increased monitoring and reporting, liability insurance, and water supply severance. Increased monitoring and reporting does not require specific legal authority.

(a) Public Notice. A publication concerning an industrial user or list of industrial users, which have violated pretreatment requirements. The public notice satisfies the public's right to know about industrial violations that affect the immediate environment and/or cause or potentially cause additional expenditures of public funds for operation and maintenance of the treatment system. EPA regulation, 40 CFR 403.8(f)(2)(vii) requires an annual publication of all industrial users, which have significantly violated applicable pretreatment standards during the past year. Accordingly, the permittee is apprised that noncompliance with this permit may lead to an enforcement action and may result in the industrial user, at their expense place a minimum quarter page advertisement in the largest daily newspaper within its service area. The ad shall list the company name, address, and an explanation of each violation, frequency of violation, and actions taken to remedy further violations, and current compliance status.

(b) Increased Monitoring and Reporting. Required by the Control Authority when a history of noncompliance exists. The Control Authority may require additional monitoring and reporting when a history of noncompliance exists and until a specific problem is corrected or consistent compliance is demonstrated. The additional monitoring may be either self-

monitoring and/or compliance monitoring. The increased monitoring and reporting will last for a specific time or when a specific contingency has been satisfied.

(c) Liability Insurance. The control authority may decline to issue or reissue an industrial user permit to any user who has failed to comply with any provision of this article, a previous industrial user permit, or order issued hereunder, or any other pretreatment standard or requirement, unless the user first submits proof that it has obtained financial assurances sufficient to restore or repair damage to the POTW caused by its discharge.

(d) Water Supply Severance. Termination of water service by the Control Authority when an industrial user violates or continues to violate any provision of the city ordinance, industrial waste discharge permit, or other pretreatment standard. Service will only recommence, at the user's expense, after the industrial user has satisfactorily demonstrated its ability to comply.

(e) Recovery of Costs Incurred. In addition to civil and criminal liability, the permittee violating any of the provisions of this permit or causing the damage to or otherwise inhibiting the Rogers' wastewater disposal system shall be liable to the Control Authority for any expense, loss, or damage caused by such violation or discharge. The Control Authority shall bill the permittee for the costs incurred by the Control Authority for any cleaning, repair, or replacement work caused by the violation or discharge. Refusal to pay the assessed costs shall constitute a separate violation.

Part III PROHIBITIVE DISCHARGE STANDARDS

1. General Prohibitions

The permittee shall not introduce or cause to be introduced into the POTW any pollutant(s) or wastewater(s) that causes pass through or interference.

2. Specific Prohibitions

The permittee shall not introduce or cause to be introduced into the POTW the following pollutants, substances, or wastewater:

(a) Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, wastestreams with a closed cup flashpoint of less than 140° F (60° C) using the test methods specified in 40 CFR 261.21;
(b) Pollutants that will cause corrosive structural damage to the POTW or equipment, but in no case discharges with pH lower than 5.0;
(c) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in interference;
(d) Any pollutant, including oxygen demanding pollutants (BOD, etc.), released in a discharge at a flow rate and/or pollutant concentration which, either singly or by interaction with other pollutants, will cause interference with the POTW;
(e) Wastewater having a temperature greater than 104° F (40° C), or which will inhibit biological activity in the POTW resulting in interference;
(f) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;
(g) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;
(h) Any trucked or hauled pollutants, except at discharge points designed by the POTW.

PART IV OTHER REQUIREMENTS

1. Pollution Prevention Program

The permittee is required to develop and/or maintain an on-going comprehensive pollution prevention program (P2) which will utilize materials, processes and/or practices to reduce or eliminate pollutants or waste at the source. The P2 must incorporate source reduction, energy efficiency, reuse of input materials during production, and reduced water consumption. The P2 must include practices which reduce the use or generation of any hazardous substance, pollutant, or contaminant entering the wastestream prior to recycling, treatment, or disposal and reduce the hazards to public health and the environment associated with the release of such pollutants.

The P2 should include such techniques as toxics use reduction, raw material substitution, process and/or production modification, equipment and/or technology modification, reformulation and/or product redesign, and training. Additional techniques include better management practices such as improved inventory control, maintenance, housekeeping, operating, production planning and sequencing procedures. The permittee is required to integrate these techniques into the company's policies and structures. The management strategies must also contain methods for establishing an on-going company-wide pollution prevention program, conducting assessment, and implementing options.

The P2 Plan must address the following:

(a) A policy statement of management's commitment to pollution prevention;
(b) Specific goals of the plan, including numeric performance goals;
(c) Technically and economically practical pollution prevention options and a schedule for their implementation;
(d) An accounting of hazardous waste management costs;
(e) A description of pollution prevention training programs for employees;
(f) A rationale for stated performance goals;
(g) A process-flow diagram showing where constituents enter/exit manufacturing process;
(h) An estimate of the amount of regulated waste generated by each process;
(i) An assessment of current and past pollution prevention activities, including an estimate of the reduction in amount of toxicity of regulated waste achieved by the identified actions;
(j) A review of pollution prevention opportunities applicable to the facility's operations;
(k) Identification of technically and economically feasible pollution prevention opportunities, including an assessment of the cost, benefits, and cross-media impacts of the identified opportunities; and
(l) An implementation timetable.

Failure of the P2 to prevent violations of any other provisions of the permit in no way relieves the permittee from its legal liability for noncompliance with the permit conditions. The permittee must submit revisions or a statement of review to the Control Authority by April 1st of each year that would verify the on-going P2 performance goals are being met. Once P2 goals have been met, the permittee is encouraged to seek continuous environmental improvements even beyond these reductions.

2. Slug Control Plan (SCP)

The permittee shall develop and/or maintain a Slug Control Plan (SCP) with policies and procedures to prevent or mitigate the effects of slug discharges to the POTW. The function of the SCP is to ensure that the permittee has a planning and implementation tool to minimize potential spills and/or slugs and to prevent interference at a POTW due to non-routine or accidental discharges. The SCP may include constructing physical containment facilities as well as implementing sound management practices to prevent slug discharges.

A Slug Discharge is defined as any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or 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 (40 CFR 403.8(f)(2)(vi)). All slug discharges and any facility changes affecting the potential for a slug discharge must be reported to the Control Authority immediately upon knowledge of the discharge.

Failure of the SCP to prevent violations of any other provisions of the permit in no way relieves the permittee from its legal liability for noncompliance with the permit conditions.

The Slug Control Plan must address the following:

(a) General Information: permittee name and address, permittee contact, and security provisions;
(b) Discharge Practices: description of discharge practices, including non-routine batch discharges;
(c) Facility Layout Flow Diagrams: general layout including mapping of manufacturing, storage, transportation, and disposal areas;
(d) Material Inventory: description of stored chemicals (types, volumes, container);
(e) Spill and Leak Prevention Equipment and Operations and Maintenance Procedures: definition of available equipment and plans to obtain equipment;
(f) Emergency Response Equipment and Procedures: inventory and location of equipment and procedures;
(g) Slug Reporting: procedures for immediately notifying the POTW of slug discharges, including any discharge that would violate a prohibition under 40 CFR 403.5(b), with procedures for follow-up written notification within 5 days;
(h) Training Program: assurances that the Slug Control Plan is implemented by trained employees; and
(i) Prevention Procedures: a variety of procedures to prevent adverse impact from any accidental spills, including inspection and maintenance of storage areas, handling and transfer of materials, loading and unloading operations, control of plant site run-off, building of containment structures or equipment, measures for containing toxic organic pollutants, including solvents.

Once the SCP is approved, the permittee shall assess the current SCP and submit revisions or a statement of review to the Control Authority by April 1st of each year.

PART V PRETREATMENT CHARGES AND FEES

1. Excess Loading Surcharge

The permittee is subject to a surcharge, in addition to the regular sewage service charge, for all discharges having a carbonaceous biochemical oxygen demand ($CBOD_5$) and/or total suspended solids (TSS) concentration greater than 300 mg/L. The calculated surcharge will be determined using a single sample result or the arithmetical average of individual values for the specific sampling period. The flow rate for calculating the surcharge will be the average daily flow during the specific sampling period. The sampling period is defined as beginning the day after the last reported sample result was below 300 mg/L and ending the day before the reported sample result was again below 300 mg/L. The surcharge of each constituent will then be determined by multiplying the excess pounds of each constituent by the appropriate rate of surcharge.

2. Miscellaneous Fees

The control authority may adopt reasonable fees for reimbursement of costs of setting up and operating the pretreatment program that may include:

(a) Fees for industrial user permit applications including the cost of processing such applications;
(b) Fees for monitoring, inspection, and surveillance procedures including the cost of collection and analyzing a user's discharge, and reviewing monitoring reports submitted by users;
(c) Fees for reviewing and responding to accidental discharge procedures and construction;
(d) Fees for filing appeals; and
(e) Other fees as the city may deem necessary to carry out the requirements of the pretreatment program.

Attachment A-4

FACT SHEET FOR INDUSTRIAL USER
DISCHARGE PERMIT 13-OMP
Ozark Mountain Poultry

The Control Authority for the City of Rogers has made a decision to reissue an industrial user discharge permit, effective **January 1, 2013**, to **Ozark Mountain Poultry** for continuation of the discharge from its production activities to the City of Rogers sanitary sewer system. The decision to reissue a discharge permit is based on the determination that the discharge would not interfere with the treatment process or otherwise be incompatible with the sewage works or result in pass-through of pollutants such that Rogers' National Pollutant Discharge Elimination System (NPDES) permit would be violated. The purpose of this fact sheet is to present the facts and reasoning on the basis of which the decision was made

1. INDUSTRY INFORMATION

Facility Name:	Ozark Mountain Poultry	
Facility Address:	750 West Easy Street Rogers, AR 72756	P.O. Box 2440 Rogers, AR 72757
Authorize Contact:	Mike Spinks V.P. Operations Phone: 479-633-8600 Fax: 479-633-8901 mspinks@ompfoods.com	
Facility Contact:	Tommy Lewis Maintenance Mgr. 479-633-8600 Fax: 479-633-8801 tlewis@ompfoods.com	
Facility Activity:	Poultry de-boning	
Discharge Location:	Location 001 process Latitude: 36° 20' 48.72" N	Longitude: 94° 07'23.86" W
Industrial Summary:	SIC / NAICS	2015 / 311615 0171 Poultry Processing
	Process Operation:	Poultry/Meat Processing-further processing
	Categorical Classification:	Non categorical
	Significant Industrial User:	Process flow > 25,000 gallon per day
	Previous Permit:	10-OMP Effective Date: 01/01/10 Expiration Date: 12/31/12
	Permit:	13-OMP Effective Date: 01/01/13 Expiration Date: 12/31/16
	CWF Applied:	No
	TOMP:	NA
	Slug Control Plan:	Yes, Revised 04/2012
	Pollution Prevention (P^2) Plan:	Yes, Revised 04/2012

Summary of Compliance with Previous Permit
During the history of the previous permit, Ozark Mountain Poultry was, for the most part, compliant will all permit limit and reporting requirements. OMP was issued an NOV for the January 2009 monitoring period due to high CBOD. OMP was issued an NOV for the August 2012 monitoring period due to high CBOD.

Connection to Sewer System
There is a single facility process-only waste line connecting to the city collection system at MH 5-58 located east of the pretreatment facility, along the southern boundary. There are also two sanitary lines; one running along the southern boundary and one running diagonally from northwest to southeast. All 3 wastestreams flow eastward and join the city combined sanitary wastestream at MH 5058. The latest diagram indicates the diagonal sanitary only line in no longer in use. The latest schematics are in the Ozark Mountain Plans File and in the server in PDF format.

Description of Operation
The process consists of receiving ice packed poultry, transferring the meat via conveyors to the various deboning processes, Whole birds are hung to be cut into front and back portions. The fronts proceed to the cone lines and the back halves (saddles) are further processed into whole legs sent to leg deboning or leg quarters can be cut into drum and thighs and packaged. Processing involves manually removing bone and skin from chicken parts, separating and weighing boneless meat, collecting and disposing offal waste, packaging and shipping (sometimes for further processing at another location). The facility operates on a 24-hour day, 5-6 days a week or 300/year utilizing various work schedules. Most product is for OMP's retail and institutional use.

Raw Materials
Raw chicken whole birds, or front and back halves.

Chemicals Used
Ozark Mountain Poultry uses chlorine and quaternary ammonia for cleanup; this is a USDA inspected facility.

Process Discharge Outfall
Process outfall Location 001, located at Latitude: 36° 20' 48.72" N Longitude: 94° 07'23.86" W, consists of the facility combined process generated wastestreams from the meat cutting operations and clean-up operations. Ozark Mountain Poultry is a USDA inspected facility and therefore is required to comply with additional clean-up requirements. The pollutants discharged from this facility consist of chicken particles, oil and grease, and sanitation chemicals from cleaning.

Ozark Mountain Poultry discharges approximately 82,000 gpd process wastewater at location 001. Ozark Mountain Poultry is considered a continuous discharger.

Production Data
Ozark Mountain Poultry produces 260,000 pounds/day of chicken meat, 300 days/year. OMP attempts to process 120 birds per minute. At six lbs per bird the peak process rate is 43,000 lbs per hour (not the finished product weight).

Pretreatment System
Ozark Mountain Poultry's pretreatment process consists of a rotary screen, 100,000 gallon EQ tank, floc tubes, a DAF unit, and a sludge holding tank.

Wastewater from the process operations gravity flows to a settling pit and is then pumped to a rotary screen to remove more solids. Then water is pumped into an EQ tank to allow bacteria to ingest solubles. After approximately 24-hours holding time, the water is pumped through flocculation tubes where it is

mixed with metered doses of polymers (2) and a coagulant, before going into the DAF tank. In the DAF tank the addition of air creates dissolved air bubbles that attach to the solids, causing the solids to rise to the top and form a blanket of sludge which is then removed and pumped to a storage tank. The stored sludge is collected by TRS and land applied in an approved process. The treated water passes from the DAF unit into the city sanitary sewer system.

Flow Information

Primary Measuring Device:	ISCO flow meter - Model 4230 ISCO sampler – Model 3710
Process Wastewater	82,000 gpd

2. BASIS FOR PERMIT LIMITS

Permit Application

A copy of Ozark Mountain Poultry's current permit renewal application is located in the files.

Analytical Data Summary

A summary of Ozark Mountain Poultry's self-monitoring and compliance monitoring data is listed in Attachment 1.

Federal, State, and Local Regulations

Ozark Mountain Poultry must comply with 40 CFR Part 403, General Pretreatment Regulations, and with all applicable regulations and standards contained in the City Code.

Facility Plans and Flow Diagrams

Any pertinent facility plans and flow diagrams located in the files. Discharge Permit limits are established at Location 001, which is end-of-process and after pretreatment.

Rational for Effluent Limitation

Permit Limit Calculations

$CBOD_5$:	Monthly average ppm limit	none	
	Monthly average loading	328 lbs/day	480 mg/L x 8.34 x 0.082 MGD
TSS:	Monthly average conc limit	none	
	Monthly average loading	205 lbs/day	300 mg/L x 8.34 x 0.082 MGD
O/G:	Monthly average conc limit	none	
	Monthly average loading	68 lbs/day	100 mg/L x 8.34 x 0.082 MGD
TP:	Monthly average conc limit	none	
	Monthly average loading	10.7 lbs/day	10.7 mg/L x 8.34 x 0.082 MGD

3. FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

Location 001 - During the period of January 1, 2013 through December 31, 2016, the quality of the effluent discharged from Location 001 shall not exceed the following effluent limitations. In addition, the discharge shall comply with 40 CFR Part 403 General Pretreatment Regulations and with all applicable regulations and standards contained in the City Code. Effluent from this location shall consist of only combined process generated wastewater. Any single analysis and/or measurement beyond the specified pH range shall be considered a violation of the conditions of this permit. All loading limits are calculated based on a daily full production flow of **0.082000** MGD (75th Percentile). The monthly average loading limits for CBOD5, TSS, Oil/Grease, and TP are calculated local limits based on protecting the quality of the POTW's effluent, managing the electrical and sludge handling costs of the POTW, and preventing pollutant slugs to the POTW. Concentration limits will only be used if there is evidence that the flow data supplied by the permittee is significantly inaccurate.

	Discharge Limits Est. Monthly Average Concentration[1]		Discharge Limits Monthly Average[2] Loading		Monitoring Requirements	
	mg/L	TRC mg/L	lbs/day	TRC[3] lbs/day	Frequency	Sample Type
$CBOD_5$	480	670	328	460	2/Month[4]	24-hour FPC[5]
TSS	300	420	205	287	2/Month[4]	24-hour FPC[5]
Oil / Grease	100	140	68	96	1/Month	Discrete Grab[6]
Phosphorus (T)	15.7	18.8	10.7	12.9	2/Month[4]	24-hour FPC[5]
Ammonia	Report	N/A	Report	N/A	1/Month	24-hour FPC[5]
pH	5.0 Min	12.0 Max			2/Month[4]	pH Grab[7]
Flow (MGD)	Check calibration weekly and report daily flows					Indicate/Totalize

1 **Est. Monthly Average Concentration** means the highest allowable average concentration of all daily discharges determined during the calendar month. Compliance with the monthly average limits is required regardless of the number of samples analyzed. CBOD and TSS concentration limits are rounded to 2 significant figures. The concentration limit will only be used in place of the loading limit when it has been determined that the flow used to calculate the loading is significantly inaccurate.

2 **Monthly Average Loading** means the highest allowable average loading of all daily discharges determined during the calendar month. Compliance with the monthly average limits is required regardless of the number of samples analyzed.

3 **TRC** (Technical Review Criteria) means a numeric threshold of 20% above daily and/or monthly limits (40% for CBOD, TSS, fats, oil and grease). pH is excluded. The TRC limit is used to define a subcategory of Significant Non-Compliance (SNC). A SNC violation is determined where 33 percent or more of all of the measurements taken during a six-month period equal or exceed the product of the TRC limit.

4 **2/Month** is defined as at least two samples collected each month. The sample must represent a normal process discharge day. Sampling 1/week during the first half of the month is required.

A-4d

Otherwise the required monitoring events must be at least three days apart from one another. The permittee may elect to conduct additional monitoring during the month to verify compliance or aid process control.

[5] **24-hour FPC** sample means a minimum of 12 samples collected at equal flow intervals (e.g., every 2,000 gallons) over a 24-hour period and combined.

[6] **Discrete Grab** sample means a minimum of 4 representative samples collected equally over the monitoring period, each one individually preserved at the time of collection and composited afterwards by the lab for a single result. However, the Control Authority has determined for O/G, that 2 representative samples collected and preserved are representative of the daily operation.

[7] **pH Grab** sample means an individual sample collected without regard for flow and time at a representative point in the discharge stream. A duplicate sample should be collected within 5 minutes and both grab samples must be analyzed within 15 minutes of sample collection. The Facility is required to collect 3 sets of duplicates over the 24 hour monitoring period.

5. REPORTING REQUIREMENT

Ozark Mountain Poultry is required to submit a monthly discharge monitoring report to the Control Authority on or before the 15th of the month following the monitoring period. The report shall indicate the nature and concentration of all pollutants in the effluent that are regulated by the limits, set forth in Permit 13-OMP, and include measured average daily flows. If the average daily flow varies more than 20% from 0.082000 MGD, the Control Authority will determine if permit limits will be modified.

6. STANDARD CONDITIONS

Ozark Mountain Poultry is required to provide a flow-metering device at the monitoring site. Ozark Mountain Poultry is required to maintain and calibrate the flow metering device according to manufacturer's recommendations and maintain certification records of the calibrations.

OMP has developed and implemented a Slug Control Plan (SCP) and the plan has been approved by the Control Authority. OMP is required to annual review the active plan by April of each year and submit a revise plan if necessary. At a minimum, a letter must be submitted to the Control Authority stating the SCP has been reviewed. Approval of this plan by the control authority does not relieve OMP from its requirements to meet all applicable Local, State, and Federal laws and regulations.

OMP has developed an ongoing comprehensive Pollution Prevention Plan (P2) and is required to annual review the active plan by April of each year and submit a revise plan if necessary. At a minimum, a letter must be submitted to the Control Authority stating the P2 plan has been reviewed. An updated P2 plan must be submitted at least every 3 years to verify the on-going P2 goals are being met.

OMP is required to implement and maintain process control and pretreatment initiatives that will ensure consistent effluent phosphorus concentrations below permit monthly average limits. The permittee is encouraged to develop a pollution prevention management plan that will incorporate best management practices (BMPs) and source reduction strategies that will significantly decrease phosphorus loading into the sanitary sewer system. Chemical precipitation through the use of an aluminum or iron based coagulant may be necessary.

Ozark Mt Poultry (OMP) Fact Sheet Summary of Pollutants **Oct 2010 to Sep 2012**

		CBOD mg/L	TSS mg/L	T-P mg/L		CBOD lbs/day	TSS lbs/day	T-P lbs/day	
q1	0.069123	22.4				14.94			
M	0.074160	85.0				61.54			
μ	0.076375	130.2	89.8		88.4	85.10	57.34	9.00	
q3	0.081990	219.9	110.3		17.0	128.96	73.38	11.3	
max	0.118824	524.0				361.94			
iqr	0.012868	197.5				114.0			

Month	OMP Flow MGD	OMP CBOD mg/l	OMP TSS mg/l	OMP NH3-N mg/l	OMP T-P mg/l	OMP TN mg/l	OMP O/G mg/l	OMP pH min	OMP pH max
Oct-10	0.065820	35	18		10.30		3.0	7	7.5
Nov-10	0.068920	73	70		7.40		2.0	7	7.5
Dec-10	0.073680	132	71.1		10.30		1.5	7.5	
Jan-11	0.078640	7	12		8.10		1.8	7.2	7.3
Feb-11	0.081740	149	107		11.90		2.0	7.2	7.3
Mar-11	0.090653	240	140	37.2	23.30	125	12.5	7.59	7.72
Apr-11	0.076240	22	18		14.80		1.5	7.1	7.6
May-11	0.081283	22.5	289		14.10		5.1	7.2	7.5
Jun-11	0.076840	33	28		21.60		1.5	7.3	7.5
Jul-11	0.069870	21	23		16.00		2.1	7.2	7.8
Aug-11	0.072640	69	50		16.40		4.4	7.2	7.8
Sep-11	0.082740	14	44		24.80		3.8	7.4	7.6
Oct-11	0.072860	236	344		25.20		24.2	7	7.5
Nov-11	0.062540	5	6		10.30		2.4	7	7.5
Dec-11	0.074640	31	120		9.80		6.4	7	7.5
Jan-12	0.071545	171	278		12.85		13.4	7	7.3
Feb-12	0.069190	217	178		10.55		2.3	6.9	7.3
Mar-12	0.068740	246	56		8.10		2.9	7.1	7.2
Apr-12	0.061420	19.4	25	93.5	5.94	114	8.9	7.1	7.6
May-12	0.118824	97	48		12.67		6.9	7	7.2
Jun-12	0.086940	215	26		3.60		4.4	7.3	7.5
Jul-12	0.055870	230	66	93.2	18.90	109	21.9	7.4	7.5
Aug-12	0.082820	524	84	143	24.00	183	5.9	7.5	7.7
Sep-12	0.088545	317	56	75.1	14.65	94.5	7.0	7.2	7.3

Month	OMP Flow MGD	OMP CBOD lbs/day	OMP TSS lbs/day	OMP NH3-N lbs/day	OMP T-P lbs/day	OMP TN lbs/day	OMP O/G lbs/day
Oct-10	0.065820	19.21	9.88		5.65		1.65
Nov-10	0.068920	41.96	40.24		4.25		1.15
Dec-10	0.073680	81.11	43.69		6.33		0.92
Jan-11	0.078640	4.59	7.87		5.31		1.18
Feb-11	0.081740	101.58	72.94		8.11		1.36
Mar-11	0.090653	181.45	105.85	28.12	17.62	94.51	9.45
Apr-11	0.076240	13.99	11.45		9.41		0.95
May-11	0.081283	15.25	195.57		9.56		3.46
Jun-11	0.076840	21.15	17.94		13.84		0.96
Jul-11	0.069870	12.24	13.40		9.32		1.22
Aug-11	0.072640	41.80	30.29		9.94		2.67
Sep-11	0.082740	9.66	30.36		17.11		2.62
Oct-11	0.072860	143.41	209.03		15.31		14.71
Nov-11	0.062540	2.61	3.13		5.37		1.25
Dec-11	0.074640	19.30	74.70		6.10		3.98
Jan-12	0.071545	102.03	165.88		7.67		8.00
Feb-12	0.069190	124.93	102.43		6.09		1.33
Mar-12	0.068740	141.03	32.10		4.64		1.66
Apr-12	0.061420	9.94	12.81	47.89	3.04	58.40	4.56
May-12	0.118824	96.13	47.57		12.56		6.84
Jun-12	0.086940	155.89	18.85		2.61		3.19
Jul-12	0.055870	107.17	30.75	43.43	8.81	50.79	10.20
Aug-12	0.082820	361.94	58.02	98.77	16.58	126.40	4.08
Sep-12	0.088545	234.09	41.35	55.43	10.82	69.78	5.17

Attachment A-5

INDUSTRIAL INSPECTION REPORT
CITY OF ROGERS, ARKANSAS

***** GENERAL INSPECTION INFORMATION *****

Industry name: **Ozark Mountain Poultry**

Address: 750 West Easy Street, Rogers, Arkansas 72756

Phone number: (479) 633-8600 Years at present location: 9 (since 2004)

Inspection type: Pretreatment Compliance Inspection – unannounced

Inspection date: **09/12/13** Time of inspection: **1050-1225** hrs

Industry type/category: Non Cat Poultry Further Processing 432.124 / SIC Code(s): 2015 / NAIC Code(s): 311615

Nature of operation: Poultry de-boning, cut-up & further processing

Number of employees: 515 (+/-20) Work hrs/day: 24 (3 shifts) Work days/week: 5 to 6

IUD permit number: **13-OMP** Expiration date: 12/31/16

Inspector(s): Paul Burns

Industry representative(s): Tommy Lewis

***** RECORD KEEPING INFORMATION *****

Does IU have copy of permit on file? Yes

Does IU have copies of DMR's on file? Yes Reviewed 05/13, 5/11

Has IU had any problems filling out DMR? No

Does IU have a copy of SCP, P2 and WCWM on file? Yes SCP - 03/13; P2 - 03/12

Are all required files / records maintained for three years? Yes, policy of at least 5 years.

Are all records well organized and readily available? Yes

***** GENERAL FACILITY INFORMATION *****

Did the previous inspection identify areas that the IU was required to correct? Yes, resubmit cad drawing with labels.

What progress has the IU made in correcting the identified deficiencies? OMP has not revised the schematics yet.

Are there any changes or planned changes to the facility? No major changes but Mike Spinks, VP of operations, has retired. A new signature authority letter will be needed.

Has the IU complied with IUD permit requirements? Yes.

***** GENERAL FACILITY INFORMATION *****

Raw materials used: Heavy fowl (chicken), ingredients for marinating

Process description:

Raw fowl, previously killed whole birds, packed in ice are supplied from a first processing facility in 1 cubic yard cardboard containers lined with plastic. Birds are weighed then hung on lines to be cut into front and back halves. Fronts, breast and wing meat, proceeds to cone lines. Backs, drumsticks and thighs, can be deboned or quartered. Poultry is mostly de-boned by hand; employees receive meat on conveyors; cut-up meat goes into a tray. The trays are weighed and inspected. Each tray has an ID tag which allows for the employee's performance to be tracked. The tag contains information about how the product will be processed and packaged. Products are packaged in tray packs or boxes which contain 4X10 lb bags of meat. Also, product can be stored in 1 cubic yard bulk packs that weigh about 1500 lbs. Product is then stored and shipped off-site for further processing. Some of the tray pack product is marinated using an injection system or vacuum tumbler.

Wastewater is generated from washing of floors, walls and equipment used in poultry further processing.

Products Produced:

Deboned chicken – approximately 260,000 lbs/day, 300 days a year. OMP attempts to process 120 birds per minute. At six lbs per bird the peak process rate is 43,000 lbs per hour (not the finished product weight).

Process areas:

Receiving Area:	Located in the NE and E side of the facility; iced raw chicken is received. Truck trailer thaw waste drains to pretreatment.
Debone Areas:	Multiple debone areas, also includes marination, located in the central part of the facility.
Special Cuts Area:	Smaller line that trims more fat off the meat.
Freezers & Coolers:	Freezer and blast freezer are both located in the E side of the facility
Tub Wash Area	Cleans all the trays used for conveying meat.

Note: all drains go to the holding pit at pretreatment from these areas. Sanitary from bathrooms and breakrooms flow to the South and then east along the railroad track until it reaches the City manhole MH 5-58.

Water source and consumption (MG)-%City: 95% (Avg/mo = 1.260, Max/mo = 1.408, Min/mo = 1.090)
Other: Chicken brought to facility on ice (as of July 2013)

Wastewater breakdown in gallons/day:

Sanitary:	4,000 gpd
Process, 1st and 2nd shift:	30,000 gpd
Facility washdown, 3rd shift:	24,000 gpd
Boiler / tower blowdown:	Unknown
Evaporation:	500?
Other:	3,000 gpd (truck water from ice melt)

Total treated process flow to collection system: 57,000 gpd Mon thru Fri (Sat about 28,000 gpd or less). Gpd of wastewater has decreased over the last two years due to better calibration of flow meter, and improved water use efficiency.

***** GENERAL FACILITY INFORMATION *****

Process chemicals and wastestreams:

Poultry processes do not use chemicals, however, chlorine, quaternary ammonia (quat) and sodium hypochlorite are used for disinfection, clean up of process areas and foot wash trays. Disinfection solutions are alternated to avoid bacteria resistance issues. These chemicals enter the wastestream as part of the washdown wastewater (0000-0600 shift). This wastestream goes to the pretreatment facility. Sodium thiosulfite tabs are added to the wastestream using a tube with a small hole in the bottom. The tablets slowly dissolve over several hours. Quat is not neutralized by sodium thiosulfite. Bags of dry bacteria are added to the wastestream as it enters pretreatment every morning.

Wastewater is flowing to pretreament throughout the day but significantly increases during the late night sanitation shift. Waste consists of chicken particles, oil, grease, spilled marination solution and detergents from cleaning.

There have been no changes to the process chemicals since the last inspection.

Chemical storage area:

Chemical Room: Bulk process cleaning chemicals are stored in the chemical storage area in the southeast section of the production plan. This area is double secured – only authorized personnel have access keys to specific sections within the storage area. The chemicals are stored on secondary containment pads. There is adequate secondary containment and procedures in place to address spill prevention concerns. Keypad for sanitation crew to choose different formulas for filling 5 gallon buckets – spray soap, hand scrub soap, bleach, quat, and glove soap. Comment: LIQUID IN SECONDARY CONTAINMENT AREA (found this inspection).

Pretreatment: 350 to 500 gallon totes, 55-gallon drums and bags of treatment chemicals are stored in the pretreatment building. Chemicals include anionic polymer, cationic polymer, coagulant, defoamer, 92% sodium thiosulfite tabs, sodium hypochlorite and odor neutralizer. Polymers and coagulant are mixed and stored in 360 gallon containers. Virgin chemicals are stored in the east side of the pretreatment building. In use chemicals are positioned throughout and adjacent to the treatment process.

Waste storage area:
Offal and waste from the cutting and de-boning operation are stored in offal trailers located inside the far east side of the facility. Five offal trailers are filled per day. Sludge is stored in a 7,500 gallon holding tank with 30,000 to 35,000 gallons of sludge generated per week (increase since 2012 inspection). Tommy indicated that 6 x 6000 gallons of sludge are hauled off each week.

Are employees trained to handle chemicals and hazardous substances? Yes, see Slug Control Plan.

Wastestream to surface / groundwater: Segregation of wastewater from parked truck trailers and stormwater runoff in the truck parking and unloading areas is a concern. Stormwater runs to a Greenfield/retention pond to the east of the facility. If trailers are parked properly, and drains to pretreatment are prevented from clogging, this should not be a problem.

Permit number: ARR001133 AFIN 04-1112 ADEQ Issued: ? Expiration date: 6/30/14

Are there any floor drains in or around the waste and chemical storage areas? Yes. If yes, have they been properly sealed to prevent an illegal discharge of hazardous waste? Explain: No hazardous chemicals. Chemicals in chemical storage cage do not have a floor drain. Some of the chemicals in pretreatment do not have secondary containment and will drain to pretreatment head works.

A-5c

***** MONITORING INFORMATION *****

Monitoring facility:
The monitoring facility is located outside along the southeast corner of the facility. The monitoring facility consists of a Tracom trapezoid flume (large) with an ISCO Model 4230 bubbler flow meter and an ISCO Model 3710 sampler.

This monitoring site receives water from all process waste lines. The sanitary waste line joins downstream of the process line and prior to connection with the city main sanitary line.

Comments: Effluent tends to foam up most of the time. Flume is very easy to calibrate because it is at waist level indoors. With zero flow in flume, there is some standing water in the upper end, OMP needs to subtract the standing pool depth because the flow meter will read 1 to 2 gpm otherwise. OMP cleans the bubbler on a weekly basis and checks and logs the flume calibration each day.

Sampling techniques: 24 hour Flow proportional composite, multiple grabs for pH and O/G. Flow is not always continuous and depends on the depth of water in the EQ basin.

Preservation techniques: Sampler kept <6°C, follows 40 CFR preservation requirements

Do sampling and analytical procedures conform to EPA methods? Yes

Are chain of custody procedures employed? Yes

Contract laboratory information:

Name:	Environmental Services Company, Inc.
Address:	1107 Century Avenue, Springdale, Arkansas 72762
Telephone number:	(479) 750-1170
Contact:	Lynn Pate, Lab Manager
Parameters:	TSS, CBOD, O&G, T-P, NH3-N, pH. COD run for process control in house. Recommended testing for Ammonia and TKN on a voluntary basis.
Is laboratory certified?	Yes

Permit violations (past twelve months):
Ozark Mountain Poultry is currently compliant with permit requirements.

Is Control Authority notified of all violations within twenty-four hours? Yes

At what frequency does industry sample? TSS, CBOD, and TP 2xmonth; O/G and NH3-N 1xmonth. Required by 2013 permit.

Has industry experienced any upset conditions since last inspection? No. Was Control Authority notified?

Is pH testing done in-house? Yes. If no, please name contract laboratory:

If pH testing is done in-house, does IU understand proper technique for taking pH readings? Yes.

What method is used? 2 point buffer calibration with fresh buffers. Instrument is a HACH SensION. Buffers stored in old pH buffer containers with old expiration dates. Larger containers in cabinet not expired. OMP pours the fresh buffers into the smaller containers. I told Tommy to mark each intermediate container to show they were poured from the fresh containers. pH probe was very slow to stabilize. Will recommend that a new electrode be purchased.

A-5d

***** PRETREATMENT INFORMATION *****

Pretreatment process:

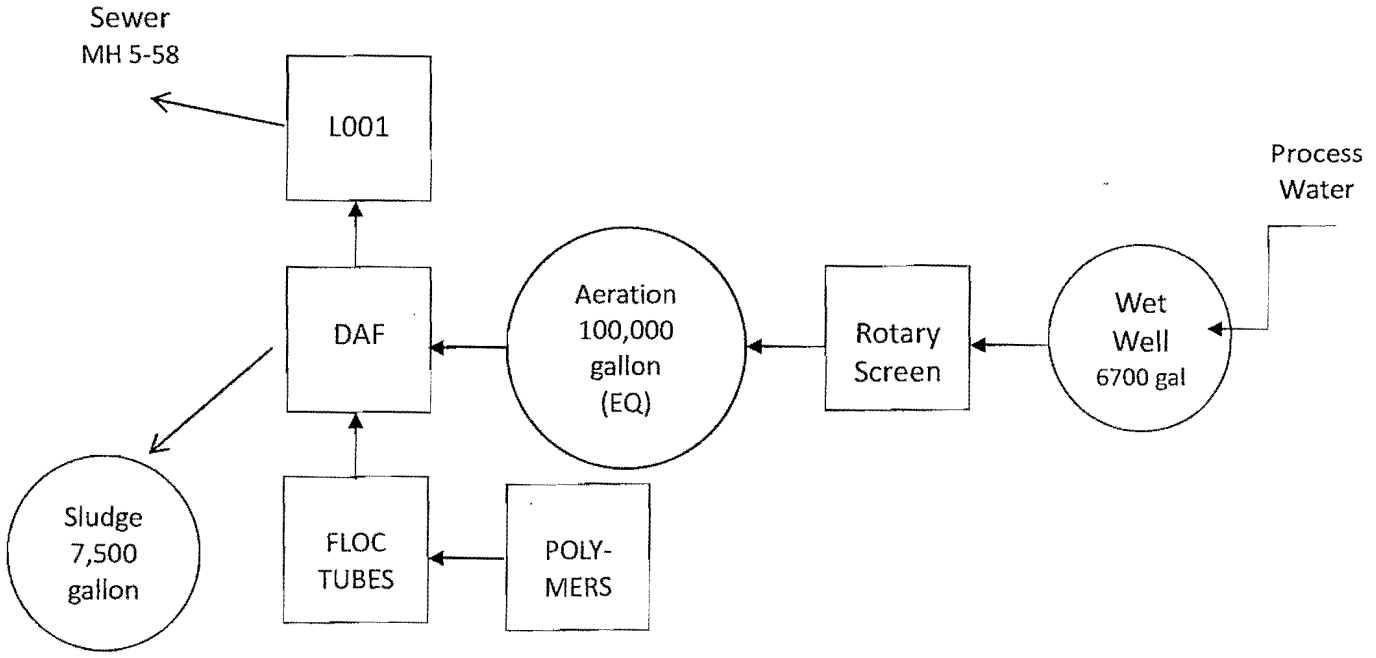
Wastewater from the process operations gravity flows to a settling pit where anti-foam is added. Then it is then pumped to a rotor screen to remove more solids. Bags of dry bacteria (1 lb) are added after the rotor screen on a daily basis. The sodium thiosulfite tabs are added here in the late afternoon. Then water is pumped into 100,000 gallon aeration tank (EQ) to allow bacteria to break down CBOD. After approximately 24-hours holding time, the water is pumped through flocculation tubes where it is mixed with metered doses of cationic and anionic polymers and a coagulant. Next, in the DAF tank, the addition of air creates dissolved air bubbles that attach to the solids, causing the solids to rise to the top and form a blanket of sludge, which is then removed and pumped to a storage tank. The stored sludge is collected by TRS and land applied in an approved process. The treated water passes from the DAF unit into the city sanitary sewer system.

Solids from the rotary screen are pumped to the 7500 gallon sludge tank. OMP operates the pretreatment system until the EQ basin is drained to 40 to 50% capacity. There are a few hours everyday when the system is not pretreating and is instead building up volume in the EQ basin.

Have there been any changes to the pretreatment process since the last inspection? Yes. If yes, explain: Reported daily flow has decreased with more accurate flow measurement.

Comments:
OMP does not cook any of its product so no broth or breading. OMP uses one 360 gallon tote of coagulant per month. Sanitation uses QUAT on Sundays only.

Pretreatment Process Flow Diagram (not to scale or spatially accurate)



***** ENVIRONMENTAL MANAGEMENT INFORMATION *****

Has this facility experienced a spill or slug discharge into the sanitary sewer or storm drain? Yes.

If so, describe the incident (when, what was spilled, amount, cause of spill/slug, actions taken): August 8/8/12 some wastewater was directed to a storm water green field. An investigation report was filled out and OMP fixed the problem.

Did the Control Authority evaluate this facility and determined a Slug Control Plan was necessary? Yes, in 2006
Date of initial evaluation: 09/06 Action taken by Control Authority:
Date of last evaluation: 11/07

Does this facility have a Slug Control Plan? Yes

Date last reviewed by IU? 03/13 Date last revised by the IU: 03/12

Slug/Spill concerns at this facility:

Chemical Storage: 2nd containment, adequate trenches	Spill Potential: Low
Manufacturing Processes: Drains/trenches	Spill Potential: Low
Pretreatment: 2nd containment, adequate trenches, bulk chemicals	Spill Potential: Low
Dock: Sump to pretreatment, truck trailer wastewater	Spill Potential: Medium
Specific Prohibitions: Yes	pH, oils & greases, vapors & fumes
Batch Discharges: No	
Non-Discharged Waste: Yes	Waste sludge, offal

Does this facility have a Pollution Prevention Plan? Yes

Date last reviewed by IU: 03/13 Date last revised by the IU: 03/12

What is the primary concern at this facility?
This facility has potential to discharge a high organic load (CBOD), solids (TSS) and O/G load to the sanitary system. The operation can impact the collection system if pretreatment is functioning poorly.

Describe the best management practices this facility uses to prevent or reduce pollution:
Ozark Mountain Poultry uses secondary containment for all chemicals (process and pretreatment). Essential personnel are cross-trained on process operations and are trained to respond to spills and upsets. Floor drains are narrow long slits that flow to a central drain with a mesh trap that consists of a series of holes the diameter of a pencil.

Does this facility have an Environmental Management System (EMS)? No

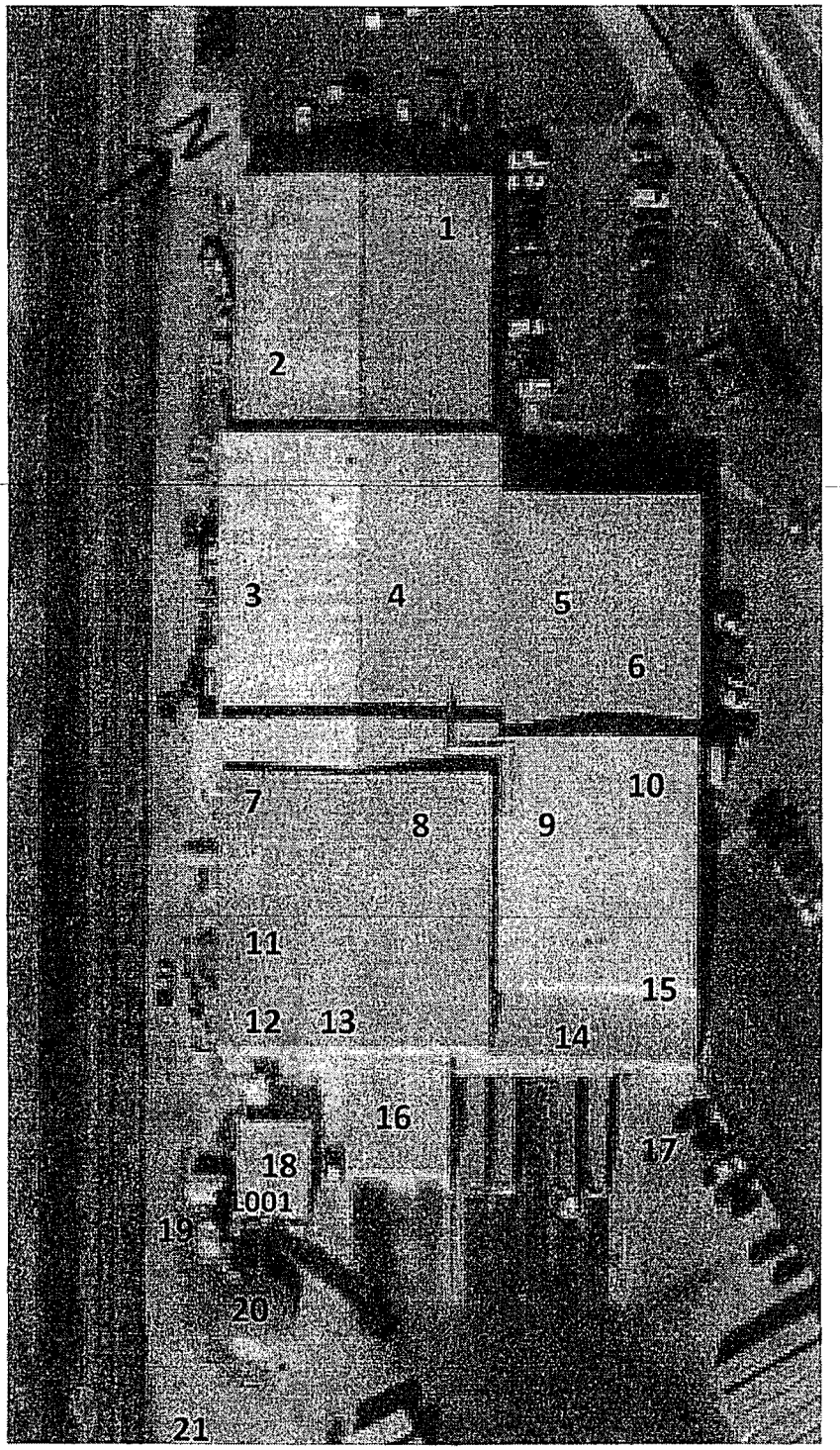
Date last reviewed by IU: N/A Date last revised by IU: N/A

Describe the environmental performance goals of this facility: N/A

***** HAZARDOUS WASTE INFORMATION *****
Does IU generate hazardous waste? No
EPA identification number of hazardous waste generator: N/A
Does IU comply with RCRA requirements? N/A
RCRA transporter: Name: Address: Phone: EPA number:
Disposal facility: Name: Address: Phone: EPA number:
Waste description: Name, amount, and frequency of disposal.
Date of last disposal: N/A
Does IU have copies of signed manifest? N/A
Are all hazardous waste drums properly labeled? N/A
Comments: No new information at this time.

***** DRAWINGS AND DIAGRAMS *****

OMP – Aerial Layout



01) Offices
02) Breakroom
03) Meat processing
04) Meat processing
05) Meat processing
06) Marination tumbling&injection
07) Maintenance storage
08) Cooler
09) Freezer
10) Traypack
11) Maintenance
12) Chemical storage
13) Bone area dump
14) Shipping dock
15) Ingredient store
16) Offal area & trash compactor
17) Stormwater pit
18) Pretreatment building (L001)
19) Sludge holding tank
20) 100,000 gal EQ tank
21) Sewer connection MH 5-58

A-5h

***** INSPECTION ANALYSIS AND SUMMARY *****

Has IU been given any new information pertaining to pretreatment by the Control Authority? No.

Inspection summary:

The inspection consisted of a facility walk-through and observation of all facility processes, pretreatment operations, monitoring facility, chemical storage, and housekeeping. During the inspection all required records and plans were reviewed. All observed operations were, for the most part, clean and operable, all documents were readily available and orderly and Ozark Mountain personnel were cooperative and informative.

Ozark Mountain Poultry is currently compliant with permit limits and reporting requirements.

OMP is commended for calibrating the flume and flow meter on a daily basis. Water discharged compared to water purchased is much closer than in years past.

The inspection detailed the following:

- Mike Spinks has retired from his position as Vice President. A new signature authorization letter is required.
- OMP now has a stormwater permit with ADEQ.
- pH buffers are being poured into old containers that have an expiration dates from 2008. The containers should be labeled to note that they are intermediate vessels.
- The pH electrode is very slow to stabilize during calibration.
- In the Chemical Storage area, the secondary containment area was partially full.
- The screen was missing for the drain below the offal trailer. Maintenance was repairing it.
- OMP still needs to provide a facility cad drawing with labels that this office can view.

Recommended action(s):

Submit a new signature authorization letter. Label intermediate pH buffer containers as such. Replace the pH electrode with a new one in order to speed up calibration and sample testing. Pump out the secondary containment in the chemical storage area more frequently. Submit a new cad facility cad schematic with labels of key areas.

Report completed by: Paul N. Burns A-5' Date: 09/30/13

ROGERS POLLUTION CONTROL FACILITY

"Serving Rogers - Protecting Our Environment"

Scott Southerly
Plant Manager
Ozark Mountain Poultry
P.O. Box 2440
Rogers, Arkansas 72757

October 2nd, 2013

Re: Pretreatment Compliance Inspection

Dear Mr. Southerly:

On September 12th, 2013, an unannounced pretreatment compliance inspection was conducted at Ozark Mountain Poultry (OMP). Paul Burns of the City of Rogers conducted the inspection. Tommy Lewis represented Ozark Mountain Poultry.

The inspection consisted of a facility walk-through and observation of all facility processes, pretreatment operations, monitoring facility, chemical storage, and housekeeping. During the inspection all required records and plans were reviewed. All observed operations were, for the most part, clean and operable, all documents were readily available and orderly and Ozark Mountain personnel were cooperative and informative.

Ozark Mountain Poultry is currently compliant with permit limits and reporting requirements. OMP is commended for calibrating the flume and flow meter on a daily basis. Water discharged compared to water purchased is much closer than in years past.

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- The pH electrode is very slow to stabilize during calibration.
- In the Chemical Storage area, the secondary containment area was partially full.
- The screen was missing for the drain below the offal trailer. Maintenance was repairing it.
- OMP still needs to provide a facility cad drawing with labels that this office can view.

Key requirements/recommendations are as follows:

- Submit a new signature authorization letter.
- Label intermediate pH buffer containers as such. Replace the pH electrode with a new one in order to speed up calibration and sample testing.
- Pump out the secondary containment in the chemical storage area more frequently.
- Submit a new facility CAD schematic with labels of key areas.

If you have any questions regarding this inspection please contact me at 479-273-7378 x306.

Sincerely,

Paul N. Burns
Pretreatment Coordinator
paulburns@rwu.org

CC: Earl Rausch, Robert Moore, & Cary Roth

A-5j