



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 A R 0 0 3 3 7 6 6 11 12 0 6 1 2 2 0 17 18 C 19 S 20 1					
Remarks					
Inspection Work Days	Facility Evaluation Rating	BI	QA	-----Reserved-----	
67 69	70 3	71 N	72 N	73	74 75 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Paragould City Light, Water & Cable WWTP 401 Grant Ln. Paragould, AR	Entry Time/Date 1000 12/20/2006 0820 12/21/2006	Permit Effective Date September 1, 2004
	Exit Time/Date 1530 12/20/2006 1440 12/21/2006	Permit Expiration Date August 31, 2009
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Lisa Ellington/Manager of Environmental Services/870-239-7795	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Darrel Phillips/Chief Administrative Officer/870-239-7700 Paragould City Light, Water & Cable P.O. Box 9 Paragould, AR 72450	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	S	Flow Measurement	M	Operations & Maintenance	S	Sampling
S	Records/Reports	S	Self-Monitoring Program	S	Sludge Handling/Disposal	S	Pollution Prevention
S	Facility Site Review	N	Compliance Schedules	S	Pretreatment	N	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	S	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

The following violations were noted:

- Improper operation and maintenance; this violates Part II Section B:1.a. of the permit. The bar screen and grit chamber were ineffective. A substantial amount of bar screen wastes were passing thru the bar screen, grit chamber, primary clarifiers, oxidation ditches, secondary clarifiers and chlorine contact chamber. The scum troughs at the end of the chlorine contact chamber were preventing bar screen items from entering the post aeration basin and leaving the plant.
- The facility was not using the proper formula to calculate percent error of the effluent flow meter.
- Improper monitoring procedures; this violates Part II Section C:3. of the permit. Some samples for CBOD analysis were routinely supersaturated. This allows bubbles to form during incubation and can reduce the accuracy of monitoring results.

A review of the DMRs since the last inspection revealed the facility failed biomonitoring with *P. promelas* in the 4th quarter of 2006. Monthly retests are being conducted and no additional impairment has been noted.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext. 12/(870) 935-4715	Date December 29, 2006
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A - PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED No)

- 1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE Y N NA
- 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES Y N NA
- 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT Y N NA
- 4. ALL DISCHARGES ARE PERMITTED Y N NA

SECTION B - RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT. DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED No)

- 1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRs. Y N NA
- 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE. S M U NA
 - a) DATES, TIME(S) AND LOCATION(S) OF SAMPLING Y N NA
 - b) NAME OF INDIVIDUAL PERFORMING SAMPLING Y N NA
 - c) ANALYTICAL METHODS AND TECHNIQUES. Y N NA
 - d) RESULTS OF ANALYSES AND CALIBRATIONS. Y N NA
 - e) DATES AND TIMES OF ANALYSES. Y N NA
 - f) NAME OF PERSON(S) PERFORMING ANALYSES. Y N NA
- 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE. S M U NA
- 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR. S M U NE
- 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA. Y N NA

SECTION C - OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED. DETAILS: S M U NA (FURTHER EXPLANATION ATTACHED No)
Barscreen and grit chamber not functioning properly

- 1. TREATMENT UNITS PROPERLY OPERATED. S M U NA
- 2. TREATMENT UNITS PROPERLY MAINTAINED. S M U NA
- 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED. S M U NA
- 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE. S M U NA
- 5. ALL NEEDED TREATMENT UNITS IN SERVICE. **1 clarifier out of service for sludge pump upgrade** S M U NA
- 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED. S M U NA
- 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED. S M U NE
- 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE. Y N NA
- STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED. Y N NA
- PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED. Y N NE

SECTION C - OPERATIONS AND MAINTENANCE (CONT'D)

9. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR? Y N NA
 IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED? Y N NA
 HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS? Y N NA

10. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT? Y N NA
 IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT? Y N NA

SECTION D - SAMPLING

PERMITTEE Sampling MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No).
 DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT. Y N NA

2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES. Y N NA

3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT. Y N NA

4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT. Y N NA

5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT. Y N NA

6. SAMPLE COLLECTION PROCEDURES ADEQUATE Y N NA

a) SAMPLES REFRIGERATED DURING COMPOSITING. Y N NA

b) PROPER PRESERVATION TECHNIQUES USED. Y N NA

c) CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136 Y N NA

7. IF MONITORING AND ANALYSES ARE PERFORMED MORE OFTEN THAN REQUIRED BY PERMIT, ARE THE RESULTS REPORTED IN PERMITTEE'S SELF-MONITORING REPORT? Y N NA

SECTION E - FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS:

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED. Y N NA
 TYPE OF DEVICE 24" Mag Meter Series 600 FM657-245-115-0

2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED. Y N NA

3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED. Y N NA

4. CALIBRATION FREQUENCY ADEQUATE. (DATE OF LAST CALIBRATION (_____)) Y N NA
 RECORDS MAINTAINED OF CALIBRATION PROCEDURES. Y N NA
 CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE. Using incorrect formula – still +/- 10% with correct Y N NA

5. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE. Y N NA

6. HEAD MEASURED AT PROPER LOCATION. Y N NA

7. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES. Y N NA

SECTION F - LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No)
 DETAILS:

1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(b) FOR SLUDGES) Supersaturated CBOD bottles Y N NA

SECTION F - LABORATORY (CONT'D)

- 2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED Y N NA
- 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT. S M U NA
- 4. QUALITY CONTROL PROCEDURES ADEQUATE. S M U NA
- 5. DUPLICATE SAMPLES ARE ANALYZED, 10 % OF THE TIME Y N NA
- 6. SPIKED SAMPLES ARE ANALYZED, 10 % OF THE TIME. Y N NA
- 7. COMMERCIAL LABORATORY USED. Y N NA

LAB NAME Arkansas State Univ. Ecotoxicology Research Facility
 LAB ADDRESS 2645 Caddo St., State University, AR 72467
 PARAMETERS PERFORMED Chronic toxicity

SECTION G - (EFFLUENT)/RECEIVING WATERS OBSERVATIONS. S M U NA (FURTHER EXPLANATION ATTACHED _____).

Based on visual observations only.

OUTFALL NO.	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOAT SOL.	COLOR	OTHER
001	None	None	Slight	None	None	Clear	--

Comments: Observation made at sample location

SECTION H - SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS. S M U NA (FURTHER EXPLANATION ATTACHED No).
 DETAILS: **Produces EQ Biosolids sold to area farmers.**

- 1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY. S M U NA
- 2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503. S M U NA
- 3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: Agriculture (e.g., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE)

SECTION I - SAMPLING INSPECTION PROCEDURES (FURTHER EXPLANATION ATTACHED No)

- 1. SAMPLES OBTAINED THIS INSPECTION. Y N NA
- 2. TYPE OF SAMPLE OBTAINED - **N/A**
 GRAB _____ COMPOSITE SAMPLE _____ METHOD _____ FREQUENCY _____
- 3. SAMPLES PRESERVED. Y N NA
- 4. FLOW PROPORTIONED SAMPLES OBTAINED. Y N NA
- 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE. Y N NA
- 6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE. Y N NA
- 7. SAMPLE SPLIT WITH PERMITTEE. Y N NA
- 8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED. Y N NA
- 9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT. Y N NA

Monthly flow calibration checks are performed by the permittee. There was an error with the formula being used to determine % error, however recalculations with the correct formula revealed the facility was within +/- 10% of the actual value.

A flow calibration check was not performed during this inspection.

FLOW CALCULATION SHEET

Field Data: Date _____ Time _____

Head in Inches _____ = _____

Type & Size of Primary Flow Measurement Device

Name & Model of Secondary Flow Measurement Device

Recorded Flow at date & time listed above _____

Flows are calculated from flow charts taken from the ISCO Open Channel Flow Measurement Handbook-5th Edition

$$\% \text{ error} = \frac{(\text{recorded value} - \text{calculated value})}{\text{calculated value}} \times 100$$

$$\% \text{ error} = \text{_____} \times 100$$

$$\% \text{ error} =$$

DMR Calculation Check

Reporting Period: From 06 11 01 ^T_o 06 11 30
 Year Month Day Year Month Day

Parameter
Checked: CBOD

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>153</u>	<u>6</u>	<u>7</u>
Calculated Value:	<u>153</u>	<u>6</u>	<u>7</u>
Permit Value:	<u>500</u>	<u>10</u>	<u>15</u>

If calculated value does not equal reported value, explain: Equal

DMR Calculation Check

Reporting Period: From 06 10 01 ^T_o 06 10 31
 Year Month Day Year Month Day

Parameter Checked: FCB

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>N/A</u>	<u>8.03</u>	<u>11.98</u>
Calculated Value:	<u>N/A</u>	<u>8.03</u>	<u>11.98</u>
Permit Value:	<u>N/A</u>	<u>1000</u>	<u>2000</u>

If calculated value does not equal reported value, explain: Equal

ADEQ

ARKANSAS
Department of Environmental Quality

January 2, 2007

Darrel Phillips, Chief Administrative Officer
Paragould City Light, Water and Cable
P.O. Box 9
Paragould, AR 72450

RE: Wastewater Treatment Plant

AFIN: 28-00060

NPDES Permit No.: AR0033766

Dear Mr. Phillips:

On December 20 and 21, 2006, I performed a routine compliance inspection of the waste water treatment facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

- 1. Improper operation and maintenance; this violates Part II Section B:1.a. of the permit.**
 - a. The barscreen was ineffective. A substantial amount of barscreen wastes were passing thru the barscreen, grit chamber, primary clarifiers, oxidation ditches, secondary clarifiers and chlorine contact chamber. The scum troughs at the end of the chlorine contact chamber were preventing barscreen items from entering the post aeration basin and leaving the plant.**
 - b. The grit chamber was not operational.**

Both of these items are essential for proper and efficient treatment of wastes as well as longevity of the treatment works.

- 2. The facility was not using the proper formula to calculate percent error of the effluent flow meter. Frequent and routine calibration checks are needed to insure that measured flow is with +/- 10% of the actual flow. Percent error should be calculated using the following formula:**

$$\% \text{ error} = (\text{recorded}_{[\text{flow meter}]} - \text{calculated}_{[\text{weir}]}) / (\text{calculated}_{[\text{weir}]}) * 100$$

- 3. Improper monitoring procedures; this violates Part II Section C:3. of the permit. Some of the samples for CBOD analysis were supersaturated. This allows bubbles to form during incubation and can reduce the accuracy of monitoring results. The maximum initial dissolved oxygen measurement for any CBOD sample should be less than or equal to the saturation point of ~9.0 mg/l at 20.0°C.**

WATER DIVISION

8001 NATIONAL DRIVE / POST OFFICE BOX 8913 / LITTLE ROCK, ARKANSAS 72219-8913 / TELEPHONE 501-682-2199 / FAX 501-682-0910

www.adeq.state.ar.us

Darrel Phillips, Paragould City Light, Water and Cable
January 2, 2007
Page 2

The above items require your immediate attention. Please submit a written response to these findings to the NPDES Enforcement Section of this Department when the violations have been corrected. This response should contain documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by **January 24, 2007**.

If I can be any assistance, please contact me at 870-935-7221 ext.-12.

Sincerely,



Brent L. Walker
District 3 Field Inspector
Water Division

cc: NPDES Enforcement Branch
NPDES Permits Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
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NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES										yr/mo/day					Inspec. Type	Inspector	Fac Type			
1 <input type="text" value="N"/> 2 <input type="text" value="5"/> 3 <input type="text" value="A"/> <input type="text" value="R"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="3"/> <input type="text" value="3"/> <input type="text" value="7"/> <input type="text" value="6"/> <input type="text" value="6"/> 11 <input type="text" value="0"/> 12 <input type="text" value="6"/> 1 <input type="text" value="2"/> 2 <input type="text" value="2"/> 1 17 18 <input type="text" value="I"/> 19 <input type="text" value="S"/> 20 <input type="text" value="2"/>																					
Remarks																					
<input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="C"/>																					
Inspection Work Days					Facility Evaluation Rating					BI		QA		-----Reserved-----							
67 <input type="text"/> <input type="text"/> <input type="text"/> 69					70 <input type="text" value="N"/>					71 <input type="text" value="N"/>		72 <input type="text" value="N"/>		73 <input type="text"/> <input type="text"/>		74 <input type="text"/> <input type="text"/>		75 <input type="text"/> <input type="text"/>		80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Prestolite Wire Corporation One Prestolite Rd. P.O. Box 1632 Paragould, AR 72450	Entry Time/Date 0940 12/21/2006	Permit Effective Date September 1, 2004
	Exit Time/Date 1015 12/21/2006	Permit Expiration Date August 31, 2009
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Rhonda W. Quenzer/Safety Coordinator/870-239-6105 Phill Holloway/Engineer		Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number Lanny Million/VP of Operations and Acting Plant Manager P.O. Box 1632 Paragould, AR 72450		
		<p style="text-align: center;">Contacted</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input type="text" value="Y"/> Pretreatment	<input type="checkbox"/> Multimedia
<input type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

This facility was inspected during a pretreatment inspection on the city of Paragould, AR and has an active permit issued by the POTW (Permit #89-06).

Name(s) and Signature(s) of Inspector(s) Brent L. Walker	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext. 12/(870) 935-4715	Date December 29, 2006
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial User Site Visit

Name of Industry: Prestolite Wire Corporation

Industry Contacts: Rhonda W. Quenzer & Phill Holloway

Type of Industry: Metal Finishing – Permitted as a dry categorical

Date of Visit: December 21, 2006

- | | | | | | | |
|---|---------------|-----|---------------|----|---------------|-----|
| 1. Significant industrial user? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 2. Pretreatment equipment or procedures? | <u> </u> | Yes | <u> </u> | No | <u>X</u> | N/A |
| 3. Pretreatment equipment maintained and operational? | <u> </u> | Yes | <u> </u> | No | <u>X</u> | N/A |
| 4. Hazardous waste generated or stored? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 5. Proper solid waste disposal? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 6. Solvent management/TTO control? | <u> </u> | Yes | <u> </u> | No | <u>X</u> | N/A |
| 7. Suitable sampling location? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 8. Appropriate self-monitoring procedures/equipment? | <u> </u> | Yes | <u> </u> | No | <u>X</u> | N/A |
| 9. Adequate spill prevention? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 10. Industry familiar with limits and requirements? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |

Additional Comments:

None

Visit Conducted by: Brent L. Walker *Brent L Walker*

Date: December 29, 2006



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
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NPDES Compliance Inspection Report

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Remarks					
<input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="2"/> <input type="text" value="C"/>					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 <input type="text"/> <input type="text"/> <input type="text"/> 69	70 <input type="text" value="N"/>	71 <input type="text" value="N"/>	72 <input type="text" value="N"/>	73 <input type="text"/>	74 <input type="text"/> 75 <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Tenneco Automotive 1601 Hwy 49B North Paragould, AR 72450 IU - Paragould City Light, Water & Cable AR0033766	Entry Time/Date 0915 12/21/2006	Permit Effective Date September 1, 2004
	Exit Time/Date 0935 12/21/2006	Permit Expiration Date August 31, 2009
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Gerald Hobbs/Environmental Technician/870-870-239-8521	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Earl Hamlett/Plant Manager 1601 Hwy 49B North Paragould, AR 72450	Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> CSO/SSO
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input checked="" type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

This facility was inspected during a pretreatment inspection on the city of Paragould, AR and has an active permit issued by the POTW (Permit #93-01).

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext. 12/(870) 935-4715	Date December 29, 2006
Signature of Reviewer ddw	Agency/Office/Phone and Fax Numbers	Date

POTW Pretreatment Program

Industrial User Site Visit

Name of Industry: Tenneco Automotive

Industry Contacts: Gerald Hobbs - Environmental Technician

Type of Industry: Metal Finishing

Date of Visit: December 21, 2006

- | | | | | | | |
|---|---------------|-----|---------------|----|---------------|-----|
| 1. Significant industrial user? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 2. Pretreatment equipment or procedures? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 3. Pretreatment equipment maintained and operational? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 4. Hazardous waste generated or stored? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 5. Proper solid waste disposal? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 6. Solvent management/TTO control? | <u> </u> | Yes | <u> </u> | No | <u>X</u> | N/A |
| 7. Suitable sampling location? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 8. Appropriate self-monitoring procedures/equipment? | <u> </u> | Yes | <u> </u> | No | <u>X</u> | N/A |
| 9. Adequate spill prevention? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |
| 10. Industry familiar with limits and requirements? | <u>X</u> | Yes | <u> </u> | No | <u> </u> | N/A |

Additional Comments:
None

Visit Conducted by: Brent L. Walker *Brent L Walker*

Date: December 29, 2006

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: Paragould City Light, Water & Cable

AFIN Number: 28-00060

NPDES Permit Number(s): AR0033766

Program Tracked under NPDES Permit Number: AR0033766

Fact Sheet Preparation Date: January 2006

Date of Last PCI/Audit: December 15, 2005

Date of Last Annual Report: March 2006

Name of Inspector: Brent L. Walker

Date PCI Performed: December 21, 2006

Name, Title, and Telephone Number of Facility Representative:
Lisa Ellington/Environmental Services Manager/870-239-7795

Name and Title of Other Participants: N/A

Number of IUs Visited: 2

Name(s) of IUs Visited: Tenneco Automotive
Prestolite Wire Corp.

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD RESULT IN AN UNSATISFACTORY RATING.

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. None

2. Has ADEQ or EPA been notified of these changes? N/A

3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes

4. What procedures are being used to update the IU Survey?
Review of new connections and annual review of Chamber of Commerce Directory of Manufacturers

5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 9

6. Number of Categorical Industrial Users: 8

7. How does the POTW determine the appropriate categorical standards to apply to an IU? According to 40 CFR 403 standards; the facility is currently in the process of revising technically based local limits - waiting for ADEQ

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Emerson Electric	Die cast and metal finishing	Parts cleaning
Garlock Rubber Tech.	Rubber fabrication & extrusion	Large size molding extrusion plant
LA Darling Company	Metal finishing	Phosphatizing rinse
Martin Sprocket & Gear	Metal finishing	Phosphatizing rinse & parts washing
Moore, McMillen Ind.	Metal finishing	Nitride parts washing
Prestolite Wire Corp.	Metal finishing	Zinc plating - dry
Spectrum Finishing	Metal finishing	Phosphatizing rinse
Tenneco Automotive	Metal finishing	Alkaline parts wash

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? Yes, revised technically based limits have been submitted to ADEQ.

2. Describe any apparent problems with the local limits. None: POTW has no problems - One IU had problems meeting selenium limit.

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>4/yr</u>	<u>4/yr</u>	<u>Not req.</u>	
Effluent:	<u>4/yr</u>	<u>4/yr</u>	<u>Not req.</u>	
Sludge:	<u>4/yr</u>	<u>4/yr</u>	<u>Not req.</u>	
Organics:				
Influent:	<u>2/yr</u>	<u>1/yr</u>	<u>Not req.</u>	
Effluent:	<u>2/yr</u>	<u>1/yr</u>	<u>Not req.</u>	
Sludge:	<u>2/yr</u>	<u>1/yr</u>	<u>Not req.</u>	

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?
No inhibitions or upsets

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes

2. How many IU permits (or other control documents) have been issued? 9

3. DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.
No, Martin Sprocket's permit is still administratively extended pending revision of technically based local limits - ADEQ

4. Does the control document contain the following items?
 An expiration date: Yes
 Discharge limitations: Yes
 If the program requires self-monitoring by the IUs, do the Permits contain:
 IU self-monitoring requirements: N/A
 IU reporting requirements: N/A

5. Indicate which of the following recommended standard conditions are contained in the control documents:
 Sample location: Yes
 Type of sample: Yes
 Monitoring frequency: Yes
 Bypass prohibition: New permits and added when renewed
 Right of entry: Yes
 Nontransferability: Yes
 Revocation clause: New permits and added when renewed
 Penalty Provisions: Yes
 Slug load notification: Yes
 Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>4/yr - 2/mo</u>	<u>2/yr</u>
other SIUs	<u>2/mo</u>	<u>2/yr</u>
Inspection:		
categorical IUs	<u>1/yr</u>	<u>1/yr</u>
other SIUs	<u>1/yr</u>	<u>1/yr</u>

2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? Yes

3. Are inspections announced or unannounced? Both

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: Yes

Officials present: Yes

Inspection of chemical storage areas: Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes

Inspection of the pretreatment facilities: Yes

Review of self-monitoring records: N/A - No self monitoring

Observation of IU self-monitoring procedures: N/A

Verification that approved analytical techniques are used: N/A

Verification of IU flow measurement (where required): N/A

6. Overall adequacy of inspection documentation: Documentation appears thorough and complete.

7. DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).

Yes

8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? Yes

9. Are sampling and flow monitoring equipment properly maintained? Yes

10. Is the POTW keeping proper field notes and chain of custody forms? Yes

11. Is the sampling location representative of the discharge to the collection system? Yes

12. Are sampling locations identified in POTW records? Yes

13. Are sampling services available in an emergency? Yes

14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? Same

15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? Yes

16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? Yes, phone call followed by letter of noncompliance.

17. What are the POTW's procedures for following up violations?
Phone call and informal letter; Notice of Violation, Show Cause Hearing, Civil action (fines)

18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?
BMRs are required for new hookups; There have been no new IUs in the last 10 yrs.

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address: N/A

Other environmental permits held: N/A

Description of operations: N/A

Process flow diagrams: N/A

Flow measurements: N/A

Measurements of regulated pollutants: N/A

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling procedures:
Satisfactory - inspection forms are improved/expanded following each set of inspections based on needs and observations.

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes

2. How does the POTW respond to the following violations?

Effluent limitations: Phone call followed-up by a letter

Late reports: Phone call and letter requiring response

Unpermitted discharges: Phone call and letter requiring response

Slug loads or spills: Phone call and letter requiring response

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name:	Type of Violation:	Enforcement Action:	Compliance Deadline:
None			

5. Comments on the POTW's enforcement procedures:
Appears adequate - the POTW plans to update the enforcement procedures when the plan is updated. This is expected to strengthen and formalize the current procedures.
-
-
-

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? No, see comments (section H)
2. Are staffing levels adequate? Yes
3. Are the responsible officials familiar with the approved program? Yes

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:
None
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? N/A
3. Does the POTW have copies of permits for IUs in other cities? N/A
4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? N/A
5. Comments on multijurisdictional issues: N/A
-
-
-

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Tenneco Automotive

POTW Name: Paragould City Light, Water and Cable

Industry Contacts: Gerald Hobbs - Environmental Technician

Date and Time of Visit: 12/21/2006 @ 0915

Description of Manufacturing Process:
Produce shock absorbers and strut products for automobiles.
-Metal Finishing

Sources of Process Wastewater:
Alkaline parts washing

Categorical Industry? Yes

Basis for Limits: 40 CFR 433.15 & Local Sewer Use Ordinance

Point of Application: Prior to connection to city

Description of Pretreatment Equipment and Procedures:
Oil & water separation, pH adjustment, clarification,
polymerization, sludge filter press

Spill Prevention and Solvent Management Procedures:
SPCC Plan, EQ tank & 100,000 gallon emergency storage tank

Waste paints, solvents, parts washer & oil picked up by Safety
Kleen

Sampling Location and Equipment:
Manhole ~5ft southwest of solids contact clarifier

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Prestolite Wire Corp.

POTW Name: Paragould City Light, Water and Cable

Industry Contacts: Rhonda W. Quenzer & Phill Holloway

Date and Time of Visit: 12/21/2006 @ 0940

Description of Manufacturing Process:
Bulk automotive and appliance copper wire products
with rubber and PVC insulated jacket materials
Electroplating copper conductor with tin
-Metal finishing

Sources of Process Wastewater:
Dry process - no process wastewater generated or discharged.

Categorical Industry? Yes

Basis for Limits: Local Sewer Use Ordinance

Point of Application: Prior to connection to city

Description of Pretreatment Equipment and Procedures:
Dry process - none required

Spill Prevention and Solvent Management Procedures:
No floor drains in chemical storage or production areas.
SPCC Plan

Sampling Location and Equipment:
Manhole 200ft west of southwest corner of plant

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Brent L. Walker</u>	
NAME OF FACILITY:	<u>Paragould City Light, Water and Cable</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0033766</u>	NPID
DATE OF PCI:	<u>December 21, 2006</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>9</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>8</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>0</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>0</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>0</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>0</u>	SNIN



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 A R 0 0 3 3 7 6 6 11 12 0 6 1 2 2 1 17 18 P 19 S 20 1					
Remarks					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 N	71 N	72 N	73 74 75 80	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Paragould City Light, Water & Cable WWTP 401 Grant Ln. Paragould, AR	Entry Time/Date 0820 12/21/2006	Permit Effective Date September 1, 2004
	Exit Time/Date 1440 12/21/2006	Permit Expiration Date August 31, 2009
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Lisa Ellington/Manager of Environmental Services/870-239-7795	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Darrel Phillips/Chief Administrative Officer/870-239-7700 Paragould City Light, Water & Cable P.O. Box 9 Paragould, AR 72450	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	CSO/SSO
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	S	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

Well managed pretreatment program.

See attached report for details.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax Arkansas Dept. of Environmental Quality/Jonesboro/ (870) 935-7221 ext. 12/(870) 935-4715	Date December 29, 2006
Signature of Reviewer ddw	Agency/Office/Phone and Fax Numbers	Date

ADEQ

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

January 2, 2007

Darrel Phillips, Chief Administrative Officer
Paragould City Light, Water and Cable
P.O. Box 9
Paragould, AR 72450

RE: Pretreatment Inspection

AFIN: 28-00060

NPDES Permit No.: AR0033766

Dear Mr. Phillips:

On December 21, 2006, I performed a pretreatment inspection of the waste water treatment facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed that you are in compliance with the pretreatment requirements for your facility.

If I can be any assistance, please contact me at 870-935-7221 ext.-12.

Sincerely,



Brent L. Walker
District 3 Field Inspector
Water Division

cc: NPDES Enforcement Branch
NPDES Permit Branch

WATER DIVISION

503 SLUDGE INSPECTION CHECKLIST - LAND APPLICATION

FACILITY: Paragould Light Water and Cable

PERMIT #: ARR0033766

INSPECTION DATE: December 20, 2006

1. What is the quantity of sludge land applied per year (dry weight basis)
201 Metric Tons – Annual year 2005
2. What is the required frequency of monitoring for pollutants, pathogen densities, and vector attraction reduction? (See table 2-7, p. 43)
1/yr
3. Is monitoring being conducted at the required frequency? **Yes**
4. Which set of metals limits is being met? (pollutant concentration limits or ceiling concentration limits - See Table 2-1, p. 29) **Pollutant Concentration Limits**
5. Which Pathogen Reduction Requirement alternative is being used? (See Table 2-5., p. 37) **Alternative 1, thermally treated biosolids**
Are the requirements for the alternative being met? **Yes, <2 MPN**
6. Which Vector Attraction Reduction option is being used? (See Table 2-6, p. 37)
Option 8: Total Solids of at least 90%
Are the requirements for the selected option being met? **Yes, 96%**

GO TO FLOW CHART, DETERMINE SLUDGE TYPE, RESULTING REQUIREMENTS

7. What is the sludge type? (EQ, PC, CPLR, or APLR) **EQ**
8. Are site restrictions required? **No**
Are they being met? (See Fig. 2-4, p. 38) **NA**
9. Are management practices required? **No**
Are they being met? (See Fig. 2-9, p. 45) **NA**
10. Do the general requirements apply? **No**
Are they being met? (See Fig. 2-8, p. 44) **NA**
11. Is the facility subject to loading rate limits? **No**
Are they being met? (See Table 2-1, p. 29) **NA**

NOTE: TABLES AND PAGE NUMBERS REFERENCED ABOVE ARE FROM EPA'S A PLAIN ENGLISH GUIDE TO THE EPA PART 503 BIOSOLIDS RULE, September 1994.