

ADEQ

ARKANSAS
Department of Environmental Quality

June 8, 2010

Darrell Phillips, Assistant General Manager
Paragould Light, Water and Cable
P.O. Box 9
Paragould, AR 72450

RE: Paragould Light, Water and Cable WWTP Pretreatment Compliance Inspection

AFIN: 28-00060

NPDES Permit No.: AR0033766

Dear Mr. Phillips:

On May 18, 2010, I performed a routine pretreatment compliance inspection of the above referenced 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. At the time of this inspection, it appeared that you were in compliance with the terms and conditions of your permit and the approved pretreatment program.

If I can be of any assistance, please contact me at walker@adeq.state.ar.us or 870-935-7221 ext.-12.

Sincerely,



Brent L. Walker
District 3 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



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

Form Approved
OMB No. 2040-0003

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="1"/> <input type="text" value="0"/> <input type="text" value="0"/> <input type="text" value="5"/> <input type="text" value="1"/> <input type="text" value="8"/>	17 <input type="text" value="P"/>	18 <input type="text" value="S"/>	19 <input type="text" value="S"/>	20 <input type="text" value="1"/>
Remarks					
Inspection Work Days		Facility Evaluation Rating		BI	
67 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 69		70 <input type="text" value="N"/>		71 <input type="text" value="N"/> 72 <input type="text" value="N"/> 73 <input type="text" value=""/> 74 <input type="text" value=""/> 75 <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> <input type="text" value=""/> 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 Light, Water and Cable WWTP 401 Grant Ln. Paragould, AR Greene Co.	Entry Time/Date 1005 5/18/2010	Permit Effective Date 2/1/2010
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Lisa Ellington/Manager - Environmental Services/870-239-7795	Exit Time/Date 1640 5/18/2010	Permit Expiration Date 1/31/2015
Name, Address of Responsible Official/Title/Phone and Fax Number Darrell Phillips/Assistant General Manager/870-239-7700 Paragould Light, Water and Cable P.O. Box 9 Paragould, AR 72450	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Other Facility Data

Section C: Areas Evaluated During Inspection

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

S	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
S	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)

This was a routine PCI and at the time of this inspection, it appeared that the facility was in compliance with the terms and conditions of the permit and the approved pretreatment program.

See that attached inspection report and the individual IU visit forms for additional information.

Name(s) and Signature(s) of Inspector(s) Brent L. Walker <i>Brent L. Walker</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 12/(870) 935-4715 (Fax)	Date May 28, 2010
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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

Name of Municipality: Paragould 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: Last PCI 12/21/2006

Date of Last Annual Report: March 2010

Name of Inspector: Brent Walker

Date PCI Performed: May 18, 2010

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

Name and Title of Other Participants: N/A

Number of IUs Visited: 3

Name(s) of IUs Visited: Garlock Rubber Technologies
MMI - Trutec Inc., Roto-Rooter - Hedge's Portable Toilet Rental

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. LA Darling, Spectrum, & 7-Up - Removed.
Arkansas Methodist Medical Center - Added.
2. Has ADEQ or EPA been notified of these changes? Yes
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) 7
6. Number of Categorical Industrial Users: 6
7. How does the POTW determine the appropriate categorical standards to apply to an IU? 40 CFR 403 - Local limits have been established for Selenium
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 & metal finishing	Parts cleaning
Garlock Rubber Tech.	Rubber fabrication and extrusion	Large size molding extrusion plant
Martin Sprocket & Gear	Metal finishing	Phosphatizing rinse and parts washing
MMI	Metal finishing	Nitride parts washing
Prestolite Wire Corp.	Metal finishing	Zinc plating - dry
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 - Selenium

2. Describe any apparent problems with the local limits.
None - Martin Sprocket & Gear has full allocation of Selenium Local 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>	<u>None</u>
Effluent:	<u>4/yr</u>	<u>4/yr</u>	<u>Not req.</u>	<u>None</u>
Sludge:	<u>4/yr</u>	<u>4/yr</u>	<u>Not req.</u>	<u>None</u>
Organics:				
Influent:	<u>4/yr</u>	<u>4/yr</u>	<u>Not req.</u>	<u>None</u>
Effluent:	<u>4/yr</u>	<u>4/yr</u>	<u>Not req.</u>	<u>None</u>
Sludge:	<u>4/yr</u>	<u>4/yr</u>	<u>Not req.</u>	<u>None</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? 7

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.**
Yes

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: Yes

Right of entry: Yes

Nontransferability: Yes

Revocation clause: Yes

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: Adequate

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? Very few reports required - tracked manually

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

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)?: N/A - No new facilities requiring BMR

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: _____

Compliance schedule (if needed): _____

19. Additional comments on the POTW's inspection and sampling procedures: Inspection and Sampling procedures are satisfactory.

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? N/A - No recent violations

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 a 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 - No recent

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:
<u>None</u>			

5. Comments on the POTW's enforcement procedures:
Satisfactory

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 in 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

H. EVALUATION AND COMMENTS

The organizational structure has changed slightly from the previously approved program. The contract consulting engineer position is not currently filled. Instead of three lab technicians performing the IU sampling, one lab tech, one chemist and the operator perform the IU sampling.

The pretreatment program is operating satisfactorily. The facility personnel are very knowledgeable and professional.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Roto-Rooter - Hedge's Portable Toilets

POTW Name: Paragould Light, Water and Cable

Industry Contacts: Randy Hedge

Date and Time of Visit: 5/18/2010 @ 1345 - 1450

Description of Manufacturing Process:
Operation of a septic tank pumping, grease trap and portable toilet service.

Sources of Process Wastewater:
Trucked wastes from the pumping and servicing of septic tanks, grease traps and portable toilets.

NOTE - Facility currently does not discharge to PLWC and instead trucks wastes to other facilities for disposal.

The facility is exploring the option of installing pretreatment equipment and discharging to PLWC.

Categorical Industry? No

Basis for Limits: N/A - See note above***

Point of Application: N/A - See note above***

Description of Pretreatment Equipment and Procedures:
The facility has constructed a pretreatment building with a floor drain system and collection sump without authorization from PLWC; however there is no water or sewer service to this building.

Spill Prevention and Solvent Management Procedures:
N/A - See note above***

Sampling Location and Equipment:
N/A - See note above***

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: MMI - Trutec

POTW Name: Paragould Light, Water and Cable

Industry Contacts: Mike Wooldridge

Date and Time of Visit: 5/18/2010 @ 1455 - 1510

Description of Manufacturing Process:
Low temperature heat-treating; Nitro carburization of cold rolled steel.

Sources of Process Wastewater:
Cascade rinsing and parts cleaning after Nitro carburization.

Categorical Industry? Yes

Basis for Limits: 40 CFR 433.17 and Local Sewer Use Ordinances

Point of Application: Prior to discharge

Description of Pretreatment Equipment and Procedures:
pH adjustment with H₂SO₄

Spill Prevention and Solvent Management Procedures:
Two holding tanks outside the building with a capacity 2X the daily discharge. Gate valve to stop process flow in case of an emergency.

Sampling Location and Equipment:
Sampling location is adjacent to the center of the north side of the MMI building. Equipment is provided by PLWC.

PRETREATMENT COMPLIANCE INSPECTION

IU SITE VISIT FORM

Name of Industry: Garlock Rubber Technologies

POTW Name: Paragould Light, Water & Cable

Industry Contacts: Burt Lee

Date and Time of Visit: 5/18/2010 @ 1515 - 1550

Description of Manufacturing Process:
Production of flat rubber sheet and gasket material, flat rubber and fabric conveyor belting.

Sources of Process Wastewater:
Condensate from vulcanizer and compressed air dryer.
Discharge from oil/water separator.
(Vulcanizer is only used a few days/year)

Categorical Industry? Yes

Basis for Limits: 40 CFR 428 Subpart G & Local Sewer Use Ord.

Point of Application: Prior to discharge

Description of Pretreatment Equipment and Procedures:
Oil water separation

Spill Prevention and Solvent Management Procedures:
All floor drains in plant have been sealed, spill packs and repair kits onsite, containment for waste oil.

Sampling Location and Equipment:
Sampling location is in lift station wet well located 5ft. South & 38ft. West of Southwest corner of Garlock Manufacturing building. Sampling equipment provided by PLWC.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

		CODE
INSPECTOR'S NAME:	<u>Brent Walker</u>	
NAME OF FACILITY:	<u>Paragould Light, Water & Cable</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0033766</u>	NPID
DATE OF PCI:	<u>May 18, 2010</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>7</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>6</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