



ARKANSAS  
Department of Environmental Quality

June 24, 2011

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

RE: Paragould Light, Water, and Cable -WWTP and Collection system

AFIN: 28-00470                      NPDES Permit No.: AR0033766

Dear Mr. Phillips:

On May 18-19, 2011, Brent Walker and I performed routine compliance, stormwater, and sanitary sewer overflow inspections of the above referenced facility. These inspections were conducted in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. These inspections revealed the following violations:

The following items were noted during the May 18, 2011 sanitary sewer overflow inspection:

- 1) Station B did not have the drive shaft guards properly installed.
- 2) There were excessive solids and grease in the wet well of the Burger King station.

The following item was noted during the May 19, 2011 compliance evaluation inspection:

- 1) The facility was reporting a flow weighted monthly average value for CBOD, TSS, and **NH3-N** parameters as required by a previous permit. However, the current permit specifies a non-flow weighted value to be reported for these effluent characteristics.

The **following** items were noted during the May 19, 2011 stormwater "no exposure" (**ARR00C418**) inspection:

- 1) Dried bio-solids were on the ground outside of the covered loading area of the **bio-solids** building.
- 2) The dumpster did not have a lid to prevent exposure of wastes to precipitation.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Branch of this Department. This response should be mailed to the address below and should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response is due by July 4, 2011.

Darrell Phillips, Paragould Light, Water, and Cable  
June 24, 2011  
Page 2

For additional information you may contact the Enforcement Branch by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of assistance, please contact me at [greenway@adeq.state.ar.us](mailto:greenway@adeq.state.ar.us) or 870-935-7221 ext.-15.

Sincerely,



Michael B. Greenway  
District 3 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch



Form Approved  
OMB No. 2040-0003

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

# 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	1	1	0	5	1	8	17	18	R	19	S	20	1			
Remarks																															
2 8 - 0 0 4 7 0																	G R E E N E														
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) <b>Paragould Light, Water, and Cable WWTP</b> <b>401 Grant Ln.</b> <b>Paragould, AR</b> <b>Greene Co.</b>	Entry Time/Date <b>08:50 / 05-18-2011</b>	Permit Effective Date <b>February 1, 2010</b>
	Exit Time/Date <b>11:30 / 05-18-2011</b>	Permit Expiration Date <b>January 31, 2015</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Lisa Ellington / Manager –Environmental Services / 870-239-7795, fax: 870-239-7791</b>	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Darrell Phillips / Chief Operations Officer</b> <b>Paragould Light, Water, and Cable</b> <b>P.O. Box 9</b> <b>Paragould, AR 72450</b>		
Contacted Yes <input checked="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	S	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	N	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)

On the day of this inspection, an unannounced Compliance Evaluation Inspection was planned. Upon arrival at the facility, Lisa Ellington/Manager-Environmental Services advised that she would not be available to participate in the inspection due to a planned Chlorine Leak Drill. As a result a reconnaissance inspection of the facility was conducted and the CEI was conducted the following day (May 19, 2010).

At the time of this inspection, the facility appeared to be operating within the requirements of the permit.

Refer to the letter accompanying the May 19, 2011 CEI for more information.

Name(s) and Signature(s) of Inspector(s)  <b>Michael B. Greenway</b> <b>Brent L. Walker</b>	Agency/Office/Telephone/Fax  <b>AR Dept. of Environmental Quality-Jonesboro</b> <b>(870) 935-7221 ext. 15 / (870) 935-4715 (Fax)</b>	Date  <b>June 1, 2011</b>
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**PLWC**

Paragould Light Water & Cable  
P.O. Box 9  
Paragould, AR 72451

*"One Team, One Goal...Customer Service"*

870-239-7700  
Fax: 870-239-7798  
www.paragould.com

June 30, 2011

Water Division Enforcement Branch  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Re: NPDES Permit # AR0033766  
May 2011 Inspection Response Report

As required, please find enclosed documentation and written response to violations found during the May 18 and 19, 2011 Sanitary Sewer Overflow, Compliance Evaluation and Stormwater "No Exposure" Inspections conducted at Paragould Light, Water and Cable.

If you have any questions or comments, please call Lisa Ellington, Manager of Environmental Services, at (870) 239-7795.

Thank you.

Sincerely,



Darrell Phillips  
Assistant General Manager

Enclosure

**ADEQ**

**Sanitary Sewer Overflow Inspection  
Compliance Evaluation Inspection  
Stormwater “No Exposure” Inspection**

**Response Report of**

**Paragould Light, Water and Cable**

**June 30, 2011**

## Sanitary Sewer Overflow Inspection

### Violation 1:

Station B did not have the drive shaft guards properly installed.

### Response:

Pump guards were installed at Station B on May 19, 2011. Refer to photographs below.



Pump Guards at Station B

### Violation 2:

There were excessive solids and great in the wet well of the Burger King station.

### Response:

Burger King's lift station was pumped out June 29, 2011. See photograph below.



Burger King Wet Well

## Compliance Evaluation Inspection

### Violation 1:

The facility was reporting a flow weighted average value for CBOD<sub>5</sub>, TSS and NH<sub>3</sub>-N parameters as required by a previous permit. However, the current permit specifies a non-flow weighted value to be reported for these effluent characteristics.

### Response:

Immediate action was taken to correct the spreadsheet used for calculating DMR values. As of May 2011, averages are reported on DMR as non-flow weighted values for CBOD<sub>5</sub>, TSS and NH<sub>3</sub>-N. The May 2011 spreadsheet has been attached for your review.

Paragould City Light and Water  
Wastewater Treatment Plant Effluent  
DMR Calculations

May 2011

Date	Flow (MGD) Effluent	pH (S.U.) Effluent	CBOD (mg/l) Effluent	CBOD (lbs/day) Effluent	CBOD (mg/l) Effluent Weekly	TSS (mg/l) Effluent	TSS (lbs/day) Effluent	TSS (mg/l) Effluent Weekly	NH <sub>4</sub> -N (mg/l) Effluent	NH <sub>4</sub> -N (lbs/day) Effluent	NH <sub>4</sub> -N (mg/l) Effluent Weekly	T. PHOS. (mg/l) Effluent	T. PHOS. (lbs/day) Effluent	T. PHOS. (mg/l) Effluent Weekly	NO <sub>3</sub> /NO <sub>2</sub> (mg/l) Effluent	NO <sub>3</sub> /NO <sub>2</sub> (lbs/day) Effluent	NO <sub>3</sub> /NO <sub>2</sub> (mg/l) Effluent Weekly	D.O. (mg/l) Effluent	Fecal CFU Effluent	Fecal CFU Effluent Weekly	Total Cl <sub>2</sub> Residual (mg/l) Effluent	
1	5.850																					
2	5.921	7.16	5.9	291		6.0	296		0.3	15		1.1	54		3.4	168		9.16	39		0.05	
3	6.066	7.10	7.7	390		4.8	243		0.3	15		1.1	56		4.8	243		8.67	27		0.04	
4	5.083	7.11	7.3	309		3.6	153		0.6	25		1.3	55		7.2	305		8.37	22		0.06	
5	4.963	7.14	2.8	116		4.0	166		0.4	17		1.5	62		7.8	323		8.98	24		0.03	
6	5.008	7.21	3.2	134	5.4	2.8	117	4.2	0.5	21	0.4	1.7	71	1.3	9.6	401	6.6	7.71	31	28	0.05	
7	4.705																					
8	4.662																					
9	4.822	7.23	8.6	346		8.8	354		0.5	20		1.5	60		7.4	298		8.12	26		0.05	
10	4.758	7.14	10.3	409		6.0	238		0.7	28		1.8	71		9.0	357		7.32	55		0.05	
11	4.776	7.14	8.8	351		5.0	199		0.3	12		2.1	84		11.0	438		8.28	22		0.03	
12	4.724	7.18	4.8	189		5.0	197		0.3	12		2.0	79		9.8	386		7.63	11		0.04	
13	5.373	7.13	3.1	139	7.1	4.4	197	5.8	0.3	13	0.4	2.0	90	1.9	9.8	439	9.4	6.75	57	29	0.04	
14	4.674																					
15	4.358																					
16	4.482	7.11	3.9	146		5.4	202		0.5	19		1.9	71		8.2	307		8.42	5		0.05	
17	4.701	7.13	4.1	161		3.8	149		0.4	16		1.7	67		8.0	314		8.07	37		0.05	
18	4.718	7.09	8.1	319		5.6	220		0.6	24		1.7	67		6.7	264		7.15	28		0.04	
19	4.743	7.13	7.8	309		6.6	261		0.6	24		1.5	59		7.0	277		7.96	57		0.04	
20	5.174	7.13	5.0	216	5.8	8.4	362	6.0	0.5	22	0.5	0.1	5	1.4	8.1	350	7.6	10.76	240	37	0.03	
21	5.612																					
22	4.877																					
23	6.226	7.15	3.2	166		5.4	280		0.7	36		1.6	83		7.1	369		7.72	33		0.04	
24	6.103	7.02	6.6	336		2.6	132		0.9	46		1.3	66		5.9	300		7.60	48		0.05	
25	5.341	7.08	7.5	334		2.4	107		0.6	27		1.4	62		7.3	325		8.10	22		0.05	
26	4.982	7.26	4.4	183		4.0	166		0.5	21		1.6	66		8.7	361		9.10	39		0.07	
27	4.756	7.09	4.7	186	5.3	4.4	175	3.8	0.3	12	0.6	1.8	71	1.5	9.1	361	7.6	8.80	31	33	0.05	
28	4.432																					
29	4.456																					
30	4.633	7.30	14.9	576		14.2	549		0.5	19		2.2	85		8.6	332		8.73	32		0.05	
31	4.440	7.14	12.1	448		13.8	511		0.6	22		2.1	78		9.2	341		7.68	40		0.05	
Max	6.226	7.30	14.9	576	7.1	14.2	549	6.0	0.9	46	0.6	2.2	90	1.9	11.0	439	9.4	10.76	240	37	0.07	
Min	4.358	7.02	2.8	116	5.3	2.4	107	3.8	0.3	12	0.4	0.1	5	1.3	3.4	168	6.6	6.75	5	28	0.03	
Avg	5.014	7.14	6.6	275	5.9	5.8	240	5.0	0.5	21	0.5	1.6	66	1.5	7.9	330	7.8	8.23	32	32	0.05	

D.O.	(mg/l)	Monthly Min	6.75
pH	(S.U.)	Min	7.02
	(S.U.)	Max	7.30
TSS	(lb/day)	Monthly Avg	240
	(mg/l)	Monthly Avg	5.8
	(mg/l)	Weekly Max	6.0
NH <sub>4</sub> -N	(lb/day)	Monthly Avg	21
	(mg/l)	Monthly Avg	0.5
	(mg/l)	Weekly Max	0.6
T. Phos	(lb/day)	Monthly Avg	66
	(mg/l)	Monthly Avg	1.6
	(mg/l)	Weekly Max	1.9
NO <sub>3</sub> /NO <sub>2</sub>	(lb/day)	Monthly Avg	330
	(mg/l)	Monthly Avg	7.9
	(mg/l)	Weekly Max	9.4
Flow	(MGD)	Avg	5.014
	(MGD)	Max	6.226
T. Cl <sub>2</sub> Residual	(mg/l)	Max	0.07
Fecal	CFU/100 mL	Avg	32
	CFU/100 mL	Weekly Max	37
CBOD	(lb/day)	Monthly Avg	275
	(mg/l)	Monthly Avg	6.6
	(mg/l)	Weekly Max	7.1



## Stormwater “No Exposure” Inspection

### Violation 1:

Dried bio-solids were on the ground outside of the covered loading area of the bio-solids building.

### Response:

Dried bio-solids have been cleaned from the ground outside of the covered loading area of the bio-solids facility. See photograph below.

In addition, plans have been made to enclose the loading area of the bio-solids facility to keep bio-solids produced within the confines of the building. PLWC plans to have this completed by the end of 2011.



Cleaned loading area of bio-solids building

### Violation 2:

The dumpster did not have a lid to prevent exposure of wastes to precipitation.

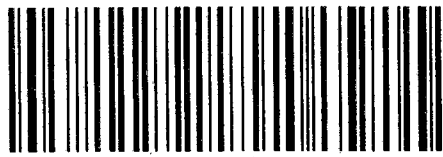
### Response:

The dumpster has been removed from the grounds of the WWTP. See photograph below.

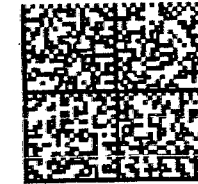


Former dumpster area

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06/30/2011

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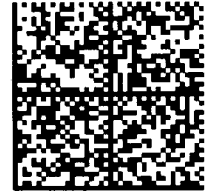
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MAILED JUN 30 2011  
72450



Paragould Light, Water & Cable  
Attention Lisa Ellington  
PO Box 9  
Paragould, AR 72450

Water Division Enforcement Branch  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

# ADEQ

ARKANSAS  
Department of Environmental Quality

August 5, 2011

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

Re: NPDES Permit No.: AR0033766, AFIN: 28-00470, Response to Inspections

Dear Mr. Phillips:

The Department has reviewed the response to the compliance inspections conducted on May 18-19, 2011 by District Field Inspector Michael Greenway. The Department has deemed the response satisfactory and has no further comment regarding these particular inspections.

The Department will keep the inspections and response on file. If future violations occur that require enforcement action, the Department will consider the inspections and response as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires the Department to consider the past history of your facility and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any future violations.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0635 or you may e-mail me at [anderson@adeq.state.ar.us](mailto:anderson@adeq.state.ar.us).

Sincerely,



Alan Anderson  
Enforcement Analyst  
Water Division Enforcement Branch