



**ARKANSAS**  
ENERGY & ENVIRONMENT

November 7, 2022

Darrell Phillips, General Manager & CEO  
Paragould Light, Water & Cable  
P.O. Box 9  
Paragould, AR 72451  
Via email to: [dphillips@paragould.com](mailto:dphillips@paragould.com) & [dromine@paragould.com](mailto:dromine@paragould.com)

**RE: Paragould Light, Water & Cable Pretreatment Inspection**  
**AFIN: 28-00047 Permit No.: AR0033766**

Dear Mr. Phillips:

On December 8, 2021, I performed a 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. A copy of the inspection report is enclosed for your records.


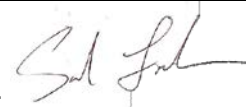

No violations were noted at the time of the inspection. Please refer to the inspection report for any comments.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Sarah Frasher'.

Sarah Frasher  
Inspector, Office of Water Quality  
5301 Northshore Drive, North Little Rock, AR, 72118

 <p><b>ENVIRONMENTAL QUALITY</b></p>	<b>OFFICE OF WATER QUALITY INSPECTION REPORT</b>				
	AFIN: <b>28-00047</b>	PERMIT #: <b>AR0033766</b>	DATE: <b>12/8/2021</b>		
	COUNTY: <b>28- Greene</b>	PDS #: <b>123341</b>	MEDIA: <b>WN</b>		
	GPS LAT: <b>36.031471</b> LONG: <b>-90.491622</b> LOCATION: <b>Entrance</b>				
<b>FACILITY INFORMATION</b>		<b>INSPECTION INFORMATION</b>			
NAME: <b>Paragould Light, Water &amp; Cable</b> LOCATION: <b>401 Grant Lane</b> CITY: <b>Paragould</b>		FACILITY TYPE: <b>Municipal</b> INSPECTOR ID#: <b>112347 S - State</b> FACILITY EVALUATION RATING: <b>N</b> INSPECTION TYPE: <b>Pretreatment Compliance</b>			
<b>RESPONSIBLE OFFICIAL</b>		DATE(S): <b>12/8/2021</b> ENTRY TIME: <b>9:32</b> EXIT TIME: <b>15:30</b> PERMIT EFFECTIVE DATE: <b>3/1/2021</b> PERMIT EXPIRATION DATE: <b>2/28/2026</b>			
NAME: / TITLE <b>Darrell Phillips / General Manager &amp; CEO</b> COMPANY: <b>Paragould Light, Water &amp; Cable</b> MAILING ADDRESS: <b>P.O. Box 9</b> CITY, STATE, ZIP: <b>Paragould AR 72451</b> PHONE & EXT: / FAX:  EMAIL:		FAYETTEVILLE SHALE RELATED: <b>N</b> FAYETTEVILLE SHALE VIOLATIONS: <b>N</b> INSPECTION PARTICIPANTS NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Lisa Ellington, PhD/ Environmental Services Manager</b> <b>David Romine, P.E./ WWTP Operations Manager</b>			
CONTACTED DURING INSPECTION: <b>No</b>					
<b>AREA EVALUATIONS</b> (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
<b>S</b>	PERMIT	<b>N</b>	FLOW MEASUREMENT	<b>N</b>	STORMWATER
<b>S</b>	RECORDS/REPORTS	<b>N</b>	LABORATORY	<b>N</b>	FACILITY SITE REVIEW
<b>S</b>	OPERATION & MAINTENANCE	<b>N</b>	EFFLUENT/RECEIVING WATER	<b>N</b>	SELF-MONITORING PROGRAM
<b>N</b>	SAMPLING	<b>N</b>	SLUDGE HANDLING/DISPOSAL	<b>S</b>	PRETREATMENT
<b>N</b>	OTHER:				
<b>SUMMARY OF FINDINGS</b>					
<p>No violations were noted at the time of the inspection. The PLWC Pretreatment staff members are very knowledgeable of the program requirements. Records are well organized and PLWC maintains a good working relationship with all of its industries.</p>					
<b>GENERAL COMMENTS</b>					
<p>Industrial User inspections for Nidec and DRiV Automotive were also performed in conjunction with this inspection.</p> <p>Wes Klasky, Jonesboro Area Inspector, and Brent Walker, Inspector Supervisor, also participated in this inspection.</p>					
INSPECTOR'S SIGNATURE: 				DATE: <b>2/4/2022</b>	
SUPERVISOR'S SIGNATURE: 				DATE: <b>11/4/2022</b>	

**DIVISION OF ENVIRONMENTAL QUALITY  
PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT**

Name of Municipality: <b>Paragould Light, Water &amp; Cable</b>
AFIN Number: <b>28-000470</b>
NPDES Permit Number(s): <b>AR0033766</b>
Program Tracked under NPDES Permit Number: <b>Yes</b>
Fact Sheet Preparation Date: <b>2/6/2012</b>
Date of Last PCI/Audit: <b>6/21/2017</b>
Date of Last Annual Report: <b>3/22/2021</b>
Name of Inspector: <b>Sarah Frasher</b>
Date PCI Performed: <b>12/08/2021</b>
Name and Title of Facility Representative: <b>Lisa Ellington, PhD./ Environmental Services Manager</b>
Name and Title of Other Participants: <b>David Romine, P.E./ WWTP Operations Manager</b> <b>Wes Klasky/ Jonesboro Area Inspector</b> <b>Brent Walker/ Inspector Supervisor</b>
Number of IUs Visited: <b>2</b>
Name(s) of IUs Visited: <b>DRiV Automotive and Nidec</b>
AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED
<b>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.</b>

<b>A. INDUSTRIAL USER SURVEY</b>		
1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. <b>N/A</b>		
2. Has ADEQ or EPA been notified of these changes? <b>N/A</b>		
<b>3. HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED? Yes</b>		
4. What procedures are being used to update the IU Survey? <b>PLWC is in the process of updating the IU survey. Updates are performed on any new electrical hook-ups every month. Collection system employees are trained on any possible unusual discharges.</b>		
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): <b>9</b>		
6. Number of Categorical Industrial Users: <b>6</b>		
7. How does the POTW determine the appropriate categorical standards to apply to an IU? <b>40 CFR 403</b>		
8. List all of the Categorical IUs discharging under the approved program. Include the name of the IU, the regulatory category (i.e. Metal Finishing), and the regulated process (i.e. phosphating, zinc plating, etc.). Additional listings can be made in the comments section if necessary.		
Name of IU:	Category:	Regulated Process:
<b>Allen Engineering</b>	<b>SIU</b>	<b>Metal Finisher</b>
<b>AMMC</b>	<b>SIU</b>	<b>Healthcare</b>
<b>GRT Rubber Tech</b>	<b>SIU</b>	<b>Rubber Extruder</b>
<b>LA Darling Company</b>	<b>SIU</b>	<b>Metal Finisher</b>
<b>Nidec Motor Corporation</b>	<b>SIU</b>	<b>Aluminum Die Caster (No discharge)</b>
<b>DRiV Automotive</b>	<b>SIU</b>	<b>Metal Finisher</b>
<b>General Cable</b>	<b>NSIU</b>	<b>Metal Finisher (No discharge)</b>
<b>Martin Sprocket</b>	<b>NSIU</b>	<b>Metal Finisher (No discharge)</b>
<b>Parker Trutec MMI</b>	<b>NSIU</b>	<b>Non-Categorical</b>

<b>B. LOCAL LIMITS</b>					
<b>1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? N/A</b>					
2. Describe any apparent problems with the local limits. <b>N/A</b>					
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?					
<b>Pollutant:</b>	<b>Sampling Frequency</b>	<b>Permit Requirement</b>	<b>Program Requirement</b>		
Metals:					
Influent:	<b>4/year</b>	<b>4/year</b>			<b>Not req.</b>
Effluent:	<b>4/year</b>	<b>4/year</b>			<b>Not req.</b>
Sludge:	<b>4/year</b>	<b>N/A</b>			<b>Not req.</b>
Organics:					
Influent:	<b>1/year</b>	<b>1/year</b>			<b>Not req.</b>
Effluent:	<b>1/year</b>	<b>1/year</b>			<b>Not req.</b>
Sludge:	<b>1/year</b>	<b>N/A</b>			<b>Not req.</b>
Comments:					
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? <b>None</b>					

<b>C. INDUSTRIAL USER CONTROL MECHANISM</b>
1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? <b>Yes</b>
2. How many IU permits (or other control documents) have been issued? <b>9</b>
<b>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</b>
4. Does the control document contain the following items? List the section of the permit each item is listed under.
An expiration date: <b>Yes</b>
Discharge limitations: <b>Yes</b>
If the program requires self-monitoring by the IUs, do the permits contain the following information? List the section of the permit each requirement is listed under.
IU self-monitoring requirements: <b>N/A</b>
IU reporting requirements: <b>N/A</b>
5. Indicate which of the following recommended standard conditions are contained in the control documents. List the section of the permit each requirement is listed under.
Sample location: <b>Yes</b>
Type of sample: <b>Yes</b>
Monitoring frequency: <b>Yes</b>
Bypass prohibition: <b>Yes</b>
Right of entry: <b>Yes</b>
Non-transferability: <b>Yes</b>
Revocation clause: <b>Yes</b>
Penalty Provisions: <b>Yes</b>
Slug load notification: <b>Yes</b>
Notification of process change: <b>Yes</b>

<b>D. MONITORING OF IUS BY POTW</b>			
1. Indicate current inspection and sampling frequency and program requirement below.			
	Current frequency:		Program Requirements:
Sampling:			
Categorical IUs	<b>4/year</b>		<b>2/year</b>
Other SIUs	<b>1-2/month</b>		<b>2/year</b>
Non-SIUs	<b>As determined as necessary</b>		<b>N/A</b>
Inspection:			
Categorical IUs	<b>1/year</b>		<b>1/year</b>
Other SIUs	<b>1/year</b>		<b>1/year</b>
Non-SIUs	<b>As determined as necessary</b>		<b>N/A</b>
Comments:			
2. HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM? <b>Yes</b>			
3. Are inspections announced or unannounced? <b>Announced</b>			
4. Are records kept of each inspection? <b>Yes</b>			
5. Does the inspection report contain an adequate description of the following:			
Date and time of inspection: <b>Yes</b>			
Officials present: <b>Yes</b>			
Inspection of chemical storage areas: <b>Yes</b>			
Description of regulated processes, categorical waste streams, and discharge location of these waste streams: <b>Yes</b>			
Inspection of the pretreatment facilities: <b>Yes</b>			
Review of self-monitoring records: <b>N/A</b>			
Observation of IU self-monitoring procedures: <b>Yes</b>			
Verification that approved analytical techniques are used: <b>N/A</b>			
Verification of IU flow measurement (where required): <b>N/A</b>			
6. Please describe the overall adequacy of inspection documentation: <b>Adequate</b>			
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). <b>Yes</b>			
8. Are analyses performed in accordance with EPA-approved			

methods (40 CFR 136)? <b>Yes</b>
9. Are sampling and flow monitoring equipment properly maintained? <b>Yes</b>
10. Is the POTW keeping proper field notes and chain of custody forms? <b>Yes (maintained by PLWC)</b>
11. Is the sampling location representative of the discharge to the collection system? <b>Yes</b>
12. Are sampling locations identified in POTW records? <b>Yes</b>
13. Are sampling services available in an emergency? <b>Yes</b>
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? <b>Calendar reminder and a sent by email with a read receipt notification.</b>
15. ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS? <b>N/A</b>
16. IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS? <b>Yes</b>
17. What are the POTW's procedures for following up violations? <b>PLWC Laboratory notifies Lab Services Manager of a permit limit violation. The facility with the violation is contacted via email or phone call within 24 hours. The facility is resampled within a week. A Notice of Violation is written at the end of the month with 15 days to respond. If a response has not been received then an email is sent with a warning. Another Notice of Violation is written for the lack of response and the GM/CEO is notified.</b>
18. HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)? <b>No new users to require BMR</b>
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: <b>N/E</b>
Other environmental permits held: <b>N/A</b>
Description of operations: <b>N/A</b>



Process flow diagrams: <b>Yes</b>
Flow measurements: <b>N/A</b>
Measurements of regulated pollutants: <b>N/A</b>
Certification of compliance by the IU: <b>N/A</b>
Compliance schedule (if needed): <b>N/A</b>
19. Additional comments on the POTW's inspection and sampling procedures: <b>N/A</b>

<b>E. Enforcement</b>			
1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? <b>Yes</b>			
2. How does the POTW respond to the following violations?			
Effluent limitations: <b>Email followed up by Notice of Violation</b>			
Late reports: <b>Email followed up by Notice of Violation</b>			
Unpermitted discharges: <b>Email followed up by Notice of Violation</b>			
Slug loads or spills: <b>Email followed up by Notice of Violation</b>			
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)? <b>Yes</b>			
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:
<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
5. Comments on the POTW's enforcement procedures: <b>Adequate</b>			

<b>F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE</b>
1. Is the program structure essentially the same as that presented in the approved pretreatment program? <b>Yes</b>
2. Are staffing levels adequate? <b>Yes</b>
3. Are the responsible officials familiar with the approved program? <b>Yes</b>

<b>G. MULTIJURISDICTIONAL ISSUES</b>
1. List any IUs which are located outside of the jurisdictional area of the POTW: <b>N/A</b>
2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? <b>N/A</b>
3. Does the POTW have copies of permits for IUs in other cities? <b>N/A</b>
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? <b>N/A</b>
5. Comments on multijurisdictional issues: <b>None</b>
<b>H. EVALUATION AND COMMENTS</b>
<b>PLWC maintains a good working relationship with all its industries. Lisa Ellington is very knowledgeable about the program and monitors the pretreatment program closely. David Romine will be the successor when she retires soon.</b>

**PRETREATMENT COMPLIANCE INSPECTION  
IU SITE VISIT FORM**

Name of Industry: <b>Nidec Motor Corporation</b>
POTW Name: <b>PLWC</b>
Industry Contacts: <b>David Snodgrass, Plant Manager; Tim Bishop, Environmental Operator</b>
Date and Time of Visit: <b>12/8/2021 13:46-14:20</b>
Description of Manufacturing Process: <b>Die caster processes and shaft machine stamping; mold cooling; casting quench</b>
Sources of Process Wastewater: <b>Aluminum die caster processes; rainwater from scrap storage, drum storage and tank farms, non-contact cooling water; part washer; tumbler wastestreams, domestic sanitary wastestream</b>
Categorical Industry? <b>Yes</b>
Basis for Limits: <b>40 CFR 464.15</b>
Point of Application: <b>No discharge</b>
Description of Pretreatment Equipment and Procedures: <b>Equalization tank to a small holding tank to a DAF unit thence another holding tank to be recirculated in the factory</b>
Spill Prevention and Solvent Management Procedures: <b>Containment area around tank farms; all drains lead to pretreatment system</b>
Sampling Location and Equipment: <b>No discharge to pretreatment except for sanitary sewer</b>

**PRETREATMENT COMPLIANCE INSPECTION  
IU SITE VISIT FORM**

Name of Industry: <b>DRiV Automotive</b>
POTW Name: <b>PLWC</b>
Industry Contacts: <b>Andy Stickler, Environmental Supervisor; Nick Evans, Operator</b>
Date and Time of Visit: <b>12/8/2021, 14:31-15:25</b>
Description of Manufacturing Process: <b>Motor vehicle manufacture of shock and struts</b>
Sources of Process Wastewater: <b>Cool down water of the metal finishing process</b>
Categorical Industry? <b>Yes</b>
Basis for Limits: <b>40 CFR 464.15</b>
Point of Application: <b>Prior to discharge to PLWC</b>
Description of Pretreatment Equipment and Procedures: <b>Oil and water skimmers remove oil and a clarifiers let water settle</b>
Spill Prevention and Solvent Management Procedures: <b>Large EQ Basin and clarifier to hold water and area inside slopes to containment area.</b>
Sampling Location and Equipment: <b>Outfall 001- just prior to final discharge. Facility rents composite samplers with PLWC performing all sampling collections.</b>

**PPETS CODE SHEET  
PRETREATMENT COMPLIANCE INSPECTION (PCI)**

	CODE
INSPECTOR'S NAME: <u>Sarah Frasher</u>	
NAME OF FACILITY: <u>PLWC</u>	
PERMIT NUMBER USED TO TRACK PROGRAM: <u>AR0033766</u>	NPID
DATE OF PCI: <u>12/8/2021</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>9</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>6</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>3 (shutdown)</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>N/A</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>0</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>N/A</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>N/A</u>	SNIN