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September 16, 2016

Alan Anderson
Enforcement Analyst
Arkansas Department of Environmental Quality
Office of Water Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: NPDES Permit # AR0033766
Consent Administrative Order AFIN 28-00470
Corrective Action Report

Dear Mr. Anderson:

Enclosed is the Corrective Action Report required by the Consent Administrative Order AFIN 28-00470 for the Paragould Light, Water and Cable NPDES Permit AR0033766.

If you have questions or need additional information, please do not hesitate to contact me at lellington@paragould.com or (870) 239-7795. Thank you for the assistance offered to Paragould Light, Water and Cable during this process.

Sincerely,

Lisa Ellington
Environmental Services Manager



**Paragould Light, Water and Cable
Wastewater Treatment Plant**

NPDES Permit AR0033766

**Arkansas Department of Environmental Quality
Consent Administrative Order
AFIN 28-00470**

Corrective Action Report

September 16, 2016

**Prepared by:
Lisa Ellington, PLWC Environmental Services Manager**

Introduction

Paragould Light, Water and Cable ("PLWC") entered into a Consent Administrative Order ("CAO") with the Arkansas Department of Environmental Quality ("ADEQ"). Paragraph 1 of the Order and Agreement Section CAO requires that Paragould:

"On or before the effective date of this Order, Respondent shall submit to the Department a Corrective Action Report. The report shall detail steps taken to correct the effluent violations as specified in Paragraph 14 of the Findings of Fact and confirm that the facility is in compliance with the permitted effluent limits referenced in Paragraph 14. The report shall be signed and certified in accordance with Part III, Section 11, Condition C of the Permit."

The remainder of this document is intended to provide the Corrective Action Report required by Paragraph 1 of the CAO.

The effluent violations referenced in Paragraph 14 of the Findings of Fact included:

- a. 10 violations for Total Residual Chlorine; and
- b. 5 violations for Carbonaceous Biochemical Oxygen Demand.

The violations are detailed in the charts found in this report.

Total Residual Chlorine (TRC)

Table 1. TRC PLWC NPDES Violations from December 1, 2012 to March 31, 2016.

Date	Reported Concentration (ppm)	Permit Limit (ppm)	Cause of Non-compliance
December 4, 2013	0.21	<0.10	Sulfur dioxide feed rate
April 15, 2015	0.11	<0.10	Sulfur dioxide feed rate
April 20, 2014	0.16	<0.10	Sulfur dioxide feed rate
May 4, 2015	0.49	<0.10	Sulfur dioxide tank empty
June 24, 2015	0.49	<0.10	Contaminated glassware
August 4, 2015	0.14	<0.011	Chlorine feed rate
October 27, 2015	0.02	<0.011	Chlorine feed rate
March 14, 2016	0.02	<0.011	Interference
March 15, 2016	0.02	<0.011	Interference
March 16, 2016	0.02	<0.011	Interference

Environmental Impact of TRC Non-compliance:

There were no observable impacts to the receiving stream as a result of the TRC non-compliances.

Corrective Action taken for TRC Non-compliances:

PLWC installed an ultraviolet (UV) disinfection system which eliminated the need for chlorine and sulfur dioxide treatment at the WWTP. The UV system was put into operation on June 15, 2016, at which time the operators discontinued chlorine and sulfur dioxide chemical treatment. All chlorine and sulfur dioxide cylinders were removed from the PLWC WWTP on June 23, 2016. TRC analysis was discontinued June 17, 2016 per communication between PLWC and ADEQ.

Total Residual Chlorine Compliance:

Discharge Monitoring Reports for the following dates have been in compliance with the TRC effluent limit.

Table 2. Current PLWC NPDES Permit Compliance Status for TRC.

Reporting Period	Reported Concentration (ppm)
April 1 - 30, 2016	0
May 1 - 31, 2016	0
June 1 - 30, 2016	0
July 1 - 31-, 2016	Conditional Monitoring - Not Required This Period
August 1 - 31, 2016	Conditional Monitoring - Not Required This Period

5-Day Carbonaceous Biochemical Oxygen Demand (CBOD₅)

Table 3. CBOD₅ PLWC NPDES Violations from December 1, 2012 to March 31, 2016.

Date	Reported Concentration (ppm)	Permit Limit (ppm)	Cause of Non-compliance
June 8-15, 2015	15.7	15	High DO levels and analytical procedure
June 2015	10.1	10	High DO levels and analytical procedure
September 8-12, 2015	17.3	15	Contaminated automatic sampler hose
September 2015	13.1	10	Contaminated automatic sampler hose
January 2015	10.4	10	Low DO levels

Environmental Impact of CBOD₅ Non-compliances:

There were no observable impacts to the receiving stream as a result of the CBOD₅ non-compliances.

Corrective Action taken for CBOD₅ Non-compliances:

PLWC WWTP operators monitor the DO concentrations in the oxidation ditches, and record the levels at least twice per day to confirm suitable DO is available for treatment. In addition, the automatic sampler hoses are changed at least once a week to prevent the accumulation of organic material. Operators are required to record in a log book the date, time and operator initials after changing the sampler hoses.

Laboratory personnel have been instructed and trained to follow analytical procedures for CBOD₅ analyses. Particular attention to cleanliness of glassware and advance preparation of dilution water has improved CBOD₅ analytical results.

5-Day Carbonaceous Biochemical Oxygen Demand Compliance:

Discharge Monitoring Reports for the following dates have been in compliance with the CBOD₅ effluent limit.

Table 4. Current PLWC NPDES Permit Compliance Status for CBOD₅.

Reporting Period	Reported Concentration (ppm)	
	Monthly Average	7-Day Average
February 1 – 28, 2016	7.7	13.5
March 1 – 31, 2016	5.7	7.7
April 1 – 30, 2016	6.1	7.6
May 1 – 31, 2016	5.4	7.9
June 1 – 30, 2016	2.4	4.1
July 1 – 31, 2016	1.7	2.4
August 1 – 31, 2016	3.1	2.9

Certification:

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

Darrell Phillips

Signature

General Mgr.

Title

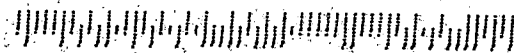
Darrell Phillips

Printed Name


9-16-2016

Date

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