

December 18, 2019

Mr. Gavin Gray
Enforcement Analyst
Office of Water Quality, Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: NPDES Permit AR0033766, AFIN 28-00470
Permitted Effluent Limitation Violations

Dear Mr. Gray:

In response to the ADEQ letter dated December 13, 2019, Paragould Light, Water and Cable (PLWC) submits the following correction action plan to address the 7-day average TSS violation that occurred during the week of May 7, 2018.

The TSS violation was due to an issue with the return activated sludge (RAS) flow meter in one of the secondary clarifiers. To prevent the reoccurrence of a TSS violation, PLWC purchased and installed a new RAS meter in the secondary clarifier. There have been no RAS issues in the clarifier since the installation of the new meter. In addition, operators monitor the RAS levels in the secondary clarifiers each day. Any clarifier that exhibits issues with the removal of RAS will be taken out of service, and the equipment repaired before putting the clarifier back into service.

PLWC endeavors to prevent any noncompliance with the NPDES Permit. If you have questions or need additional information, please do not hesitate to contact Lisa Ellington by phone at (870) 239-7795 or by email at lellington@paragould.com. Thank you.

Sincerely,



Darrell Phillips
General Manager / CEO

Enclosure



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

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

June 11, 2018

Arkansas Department of Environmental Quality
NPDES Enforcement Section
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: NPDES Permit # AR0033766 – Paragould Light Water & Cable (PLWC)
May 2018 Permit Violation

To Whom It May Concern:

PLWC regrets to inform you that the wastewater treatment plant was in non-compliance during the week of May 7, 2018. The non-compliance was for the Total Suspended Solids (TSS) weekly average limit. The cause of the violation was due to a faulty return activated sludge (RAS) meter in one of the secondary clarifiers. See the attached non-compliance report for more details.

If you have questions or need additional information, please contact Lisa Ellington, Manager of Environmental Services, at (870) 239-7795 or lellington@paragould.com. Thank you.

Sincerely,

A handwritten signature in black ink that reads "Darrell Phillips". The signature is written in a cursive style.

Darrell Phillips
General Manager/CEO

PERMITTEE Paragould Light, Water and Cable - Wastewater Treatment Plant
PERMIT NO. AR0033766

DATE OF VIOLATION Week of May 7, 2018

PARAMETER VIOLATED TSS Weekly Average

REPORTED DISCHARGE TSS Weekly Average: 22.9 ppm

PERMIT CONDITION TSS Weekly Limit: 22.5 ppm

A description of the noncomplying discharge including its impact upon the receiving waters:

TSS weekly average value above permit limit; there were no observable impacts to the receiving stream.

Cause of the non-compliance:

The TSS violation was due to an issue with the return activated sludge (RAS) flow meter in one of the secondary clarifiers. The operators shut down the clarifier on May 7, 2018 to repair the issue. Thinking the problem was fixed, the operators put the clarifier back into service on May 8, 2018, and the issue reappeared on May 9, 2018 at which time the clarifier was taken out of service. A new RAS meter was order and installed in the clarifier, and the clarifier was put back into service on May 31, 2018. There have been no RAS issues in the clarifier since the installation of the new meter.

Anticipated time the condition of noncompliance is expected to continue or, if it has been corrected, the duration of the period of noncompliance:

At the present time, the plant is in compliance.

Steps taken to reduce or eliminate the noncomplying discharge:

Monitor the RAS levels in the secondary clarifiers. Any clarifier that exhibits issues with the removal of RAS will be taken out of service, and equipment repaired before putting the clarifier back into service.

Steps taken to prevent recurrence of the condition of noncompliance:

PLWC WWTP operators will continue to monitor the flow meters and sludge depths in all the secondary clarifiers.

6-11-2018
Date


Signature