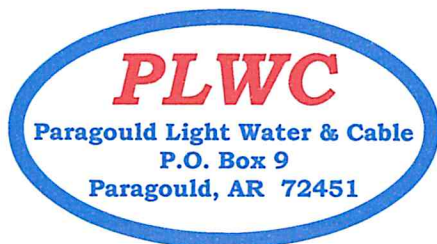


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**CERTIFIED MAIL – RETURN RECEIPT REQUESTED 7010 1670 0001 9054 1709**

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

RECEIVED  
SEP 19 2016

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

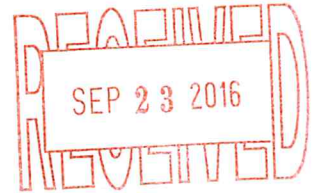
Dear Mr. Anderson:

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](mailto: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.**

| <b>Date</b>      | <b>Reported Concentration (ppm)</b> | <b>Permit Limit (ppm)</b> | <b>Cause of Non-compliance</b> |
|------------------|-------------------------------------|---------------------------|--------------------------------|
| 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.**

| <b>Reporting Period</b> | <b>Reported Concentration (ppm)</b>               |
|-------------------------|---|
| 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 (CBOD<sub>5</sub>)

**Table 3. CBOD<sub>5</sub> 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 CBOD<sub>5</sub> Non-compliances:

There were no observable impacts to the receiving stream as a result of the CBOD<sub>5</sub> non-compliances.

### Corrective Action taken for CBOD<sub>5</sub> 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 CBOD<sub>5</sub> analyses. Particular attention to cleanliness of glassware and advance preparation of dilution water has improved CBOD<sub>5</sub> analytical results.

### 5-Day Carbonaceous Biochemical Oxygen Demand Compliance:

Discharge Monitoring Reports for the following dates have been in compliance with the CBOD<sub>5</sub> effluent limit.

**Table 4. Current PLWC NPDES Permit Compliance Status for CBOD<sub>5</sub>.**

| 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