

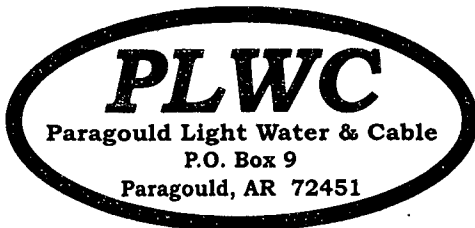
3/3/09

Allen,

I decided to send you  
a copy this year.

☺

Aisa



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Fax: 870-239-7798

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March 3, 2009

Mr. Greg Hurley  
Enforcement Assistant  
NPDES Enforcement Section  
ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Re: Pretreatment Program Status Report  
NPDES Permit No. AR0033766

Dear Mr. Hurley:

As required by Part III, Page 4 of our permit, we are submitting to you our annual list of industrial dischargers who have significantly violated pretreatment requirements. We are also submitting an updated pretreatment program status report.

Using EPA Region 6 revised criteria for significant violation, there were no significant violator to our sewer system from March 1, 2008 to February 28, 2009. This evaluation was performed by dividing the "pretreatment year" into four quarters. At the end of each quarter, the previous six months were used to determine whether the IU's were in SNC. Our pretreatment year begins on March 1.

In 1995 we started an Industrial Pretreatment Award program to recognize and honor the industries that achieved 100% compliance with both wastewater effluent limitations and reporting requirements during a calendar year. For the year 2008, we had 5 out of a total 9 industries win this award. Those who received the award were Prestolite Wire Corporation, Arkansas Methodist Medical Center, Martin Sprocket and Gear, Spectrum Finishing, Inc. and Tenneco.

If you need any additional information, please contact Lisa Ellington, Manager of Environmental Services, at (870) 239-7795.

Sincerely,

Darrell Phillips  
Assistant General Manager

Enclosures

Pretreatment Program Status Report  
Pretreatment Performance Summary  
Influent and Effluent Monitoring Results Summary

**ATTACHMENT A**  
**PRETREATMENT PROGRAM STATUS REPORT**  
**UPDATED SIGNIFICANT INDUSTRIAL USERS LIST**

| Industrial User   | SIC Code                           | Categorical Determination                         | Control Document |             | New User | Times Inspected | Times Sampled | Compliance Status (C, NC, or SNC) |                   |             |                 |               |
|---|------------------------------------|---|------------------|-------------|----------|-----------------|---------------|-----------------------------------|-------------------|-------------|-----------------|---------------|
|   |                                    |   | Y/N              | Last Action |          |                 |               | Reports                           |                   |             |                 | Permit Limits |
|   |                                    |   |                  |             |          |                 |               | BMR                               | 90-day Compliance | Semi Annual | Self Monitoring |               |
| 7-Up & RC Bottling Company**<br>Highway 412 West<br>P.O. Box 859<br>Paragould, AR 72450           | 2086                               | Non-Categorical<br>(Production of Soft Drinks)    | Y                | 04/17/2005  | N        | 1               | 16            | N/A                               | N/A               | *           | C               | NC            |
| Arkansas Methodist Medical Center<br>900 West Kingshighway<br>P.O. Box 339<br>Paragould, AR 72450 | 622110                             | Non-Categorical<br>(Health Care Facility)         | Y                | 08/01/2006  | N        | 1               | 4             | N/A                               | N/A               | *           |                 | C             |
| Emerson Electric Company<br>Pekin and Scott Street<br>P.O. Box 520<br>Paragould, AR 72450         | 3621                               | Metal Finishing &<br>Aluminum Diecasting          | Y                | 10/01/2005  | N        | 1               | 30            | N/A                               | N/A               | *           | C               | NC            |
| Garlock Rubber Technologies<br>201 Dana Drive<br>Paragould, AR 72450                              | 32622<br>339991<br>326291<br>31332 | Extruded &<br>Fabricated Rubber                   | Y                | 05/01/2006  | N        | 1               | 24            | N/A                               | N/A               | *           |                 | NC            |
| Martin Sprocket and Gear, Inc.<br>1205 South Third Avenue<br>Paragould, AR 72450                  | 2899<br>3089<br>3569               | Metal Finishing &<br>Plastics Molding and Forming | Y                | 10/01/2008  | N        | 1               | 24            | N/A                               | N/A               | *           |                 | C             |
| MMI-Trutec<br>2609 North 12 <sup>th</sup> Avenue<br>P.O. Box 757<br>Paragould, AR 72450           | 332811                             | Metal Finishing                                   | Y                | 10/01/2007  | N        | 1               | 24            | N/A                               | N/A               | *           |                 | NC            |
| Prestolite Wire Corporation<br>One Prestolite Road<br>P.O. Box 1632<br>Paragould, AR 72450        | 3357<br>3471                       | Metal Finishing<br>(Dry Categorical)              | Y                | 04/01/2006  | N        | 1               | 4             | N/A                               | N/A               | *           |                 | C             |
| Spectrum Finishing, Inc.***<br>1203 East Goldsmith Road<br>P.O. Box 607<br>Paragould, AR 72450    | 3479                               | Metal Finishing                                   | Y                | 11/01/2004  | N        | 1               | 22            | N/A                               | N/A               | *           |                 | C             |
| Tenneco Automotive<br>1601 Highway 49B<br>Paragould, AR 72450                                     | 3714                               | Metal Finishing                                   | Y                | 12/15/2005  | N        | 1               | 25            | N/A                               | N/A               | *           |                 | C             |

\*PLWC does the sampling and monitoring for the IU.

\*\*7-Up & RC Bottling Company stopped production in October 2008.

\*\*\*Spectrum Finishing, Inc. stopped production in January 2009.



**ATTACHMENT C**  
**PRETREATMENT PERFORMANCE SUMMARY (PPS)**

**NOTE:** ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY THE EPA. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT DEPARTMENT AUTHORIZATION.

I. General Information

Control Authority Name City of Paragould, Paragould Light, Water & Cable

Address P.O. Box 9

City Paragould State/Zip Arkansas

Contact Person Lisa Ellington Position Environmental Services Manager

Contact Telephone (870) 239-7795 NPDES Permit Nos. AR0033766

Reporting Period March 1, 2008 February 28, 2009  
 (Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 7

Total Number of Significant Noncategorical IUs 2

II. Significant Industrial User Compliance

|  | <u>SIGNIFICANT INDUSTRIAL USERS</u> |                       |
|--|-------------------------------------|-----------------------|
|  | <u>Categorical</u>                  | <u>NonCategorical</u> |
| 1) No. of SIUs Submitting BMRs/Total<br>No. Required. . . . .                              | <u>7 / 7</u>                        | <u>N/A*</u>           |
| 2) No. of SIUs Submitting 90-Day Compliance<br>Reports/No. Required. . . . .               | <u>0 / 0</u>                        | <u>N/A*</u>           |
| 3) No. of SIUs Submitting Semiannual Reports/<br>Total No. Required. . . . .               | <u>0 / 0</u>                        | <u>0 / 0</u>          |
| 4) No. of SIUs Meeting Compliance Schedule/<br>Total No. Required to Meet Schedule . . . . | <u>0 / 0</u>                        | <u>0 / 0</u>          |
| 5) No. of SIUs in Significant Noncompliance/<br>Total No. of SIUs . . . . .                | <u>0 / 7</u>                        | <u>0 / 2</u>          |
| 6) Rate of Significant Noncompliance for all<br>SIUs (categorical and noncategorical) . .  | <u>0 / 9</u>                        |                       |

III. Compliance Monitoring Program

SIGNIFICANT INDUSTRIAL USERS  
Categorical NonCategorical

|  |              |              |
|--|--------------|--------------|
| 1) No. of Control Documents Issued/Total No. Required. . . . . | <u>7 / 7</u> | <u>2 / 2</u> |
| 2) No. of Nonsampling Inspections Conducted. . . . .           | <u>7 / 7</u> | <u>2 / 2</u> |
| 3) No. of Sampling Visits Conducted. . . . .                   | <u>153</u>   | <u>20</u>    |
| 4) No. of Facilities Inspected (nonsampling) . . . . .         | <u>7 / 7</u> | <u>2 / 2</u> |
| 5) No. of Facilities Sampled . . . . .                         | <u>7 / 7</u> | <u>2 / 2</u> |

IV. Enforcement Actions

SIGNIFICANT INDUSTRIAL USERS  
Categorical NonCategorical

|   |              |              |
|---|--------------|--------------|
| 1) No. of Compliance Schedules Issued/No. of Schedules Required . . . . . | <u>0 / 0</u> | <u>0 / 0</u> |
| 2) No. of Notices of Violations Issued to SIUs                            | <u>10</u>    | <u>0</u>     |
| 3) No. of Administrative Orders Issued to SIUs                            | <u>0</u>     | <u>0</u>     |
| 4) No. of Civil Suits Filed. . . . .                                      | <u>0</u>     | <u>0</u>     |
| 5) No. of Criminal Suits Filed . . . . .                                  | <u>0</u>     | <u>0</u>     |
| 6) No. of Significant Violators (attach newspaper publication). . . . .   | <u>0</u>     | <u>0</u>     |
| 7) Amount of Penalties Collected (total dollars/IUs assessed) . . . . .   | <u>0 / 0</u> | <u>0 / 0</u> |
| 8) Other Actions (sewer bans, etc.). . . . .                              | <u>0</u>     | <u>0</u>     |

The following certification must be signed in order for this form to be considered complete:

I certify that the information contained herein is complete and accurate to the best of my knowledge.

  
 \_\_\_\_\_  
 Authorized Representative

3-3-2009  
 \_\_\_\_\_  
 Date

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**

REPORTING YEAR: March 1, 2008 TO February 28, 2009

TREATMENT PLANT: City of Paragould NPDES PERMIT #AR0033766

AVERAGE POTW FLOW: 3.074 MGD % IU FLOW: 13.21%

| METALS,<br>CYANIDE and<br>PHENOLS<br>(Total) | MAHC<br>(µg/l)<br>(2) | INFLUENT DATES SAMPLED<br>(µg/l)<br>Once/quarter |          |          |          | WQ<br>level/<br>limit<br>(µg/l)<br>(2) | EFFLUENT DATES SAMPLED<br>(µg/l)<br>Once/quarter |          |          |          | LABORATORY ANALYSIS         |                              |  |
|--|-----------------------|--|----------|----------|----------|--|--|----------|----------|----------|-----------------------------|------------------------------|--|
|  |                       | 04/24/08   | 07/29/08 | 10/14/08 | 01/20/09 |  | 04/24/08   | 07/29/08 | 10/14/08 | 01/20/09 | EPA<br>MQL<br>(µg/l)<br>(1) | EPA<br>Method<br>Used<br>(1) | Detection<br>Level<br>Achieved<br>(µg/l) |
|  |                       | Antimony   | N/A      | <60      | <60      |  | <60  | <60      | N/A      | <60      | <60                         | <60                          | <60                                      |
| Cadmium                                      | 7.94                  | <0.5   | <0.5     | 0.58     | <0.5     | 4.0                                    | <0.5   | <0.5     | <0.5     | <0.5     | 0.5                         | 200.8                        | 5  |
| Copper                                       | 226.73                | 29   | 40       | 27       | 45       | 29.5                                   | 4.7  | 7.3      | 5.5      | 7.4      | 0.5                         | 200.8                        | 0.5                                      |
| Lead   | 30                    | 2.8  | 1.8      | 1.4      | 2.1      | 11.7                                   | 0.57   | <0.5     | <0.5     | <0.5     | 0.5                         | 200.8                        | 0.5                                      |
| Mercury                                      | 0.27                  | <0.2   | 0.41     | <0.2     | 0.0072   | 0.01                                   | 0.0023   | 0.0018   | <0.0018  | 0.0042   | .005                        | 245.7                        | 0.0018                                   |
| Nickel                                       | 65.4                  | 3.0  | 7.4      | 9.1      | 4.9      | 322.7                                  | 4.3  | 3.1      | 2.9      | 4.2      | 0.5                         | 200.8                        | 0.5                                      |
| Selenium                                     | 11.16                 | <5   | <5       | <5       | <5       | 5.6                                    | <5   | <5       | <5       | <5       | 5                           | 200.8                        | 5  |
| Silver                                       | 138.1                 | 0.84   | 0.52     | <0.5     | 1.0      | 6.9                                    | <0.5   | <0.5     | <0.5     | <0.5     | 0.5                         | 200.8                        | 0.5                                      |
| Zinc   | 500                   | 55   | 110      | 59       | 120      | 281.9                                  | 62   | 57       | 44       | 39       | 20                          | 200.8                        | 2.0                                      |
| Chromium                                     | 239.28                | <10  | <10      | <10      | <10      | 816.8                                  | <10  | <10      | <10      | <10      | 10                          | 200.8                        | 10                                       |
| Cyanide                                      | 18.72                 | <10  | <10      | <10      | <10      | 5.8                                    | <10  | <10      | <10      | <10      | 10                          | 335.2                        | 10                                       |
| Arsenic                                      | 10.9                  | <0.5   | <0.5     | 1.3      | <0.5     | 390.5                                  | <0.5   | <0.5     | <0.5     | <0.5     | 0.5                         | 200.8                        | 0.5                                      |
| Molybdenum                                   | 23.36                 | <8   | <8       | 9.1      | <8       | N/A                                    | <8   | <8       | <8       | <8       | —                           | 200.8                        | 8  |
| Phenols                                      | N/A                   | 89   | 64       | 86       | 15       | N/A                                    | <5   | <5       | <5       | <5       | 5                           | 420.1                        | 5  |
| Beryllium                                    | 11.83                 | <0.5   | <0.5     | <0.5     | <0.5     | 5.915                                  | <0.5   | <0.5     | <0.5     | <0.5     | 0.5                         | 200.8                        | 0.5                                      |
| Thallium                                     | N/A                   | <0.5   | <0.5     | 0.83     | <0.5     | N/A                                    | <0.5   | <0.5     | <0.5     | <0.5     | 0.5                         | 200.8                        | 0.5                                      |
| Flow, MGD<br>(3)                             | N/A                   | 2.979  | 2.598    | 2.601    | 3.316    | N/A                                    | 3.265  | 2.524    | 2.640    | 3.102    | N/A                         | N/A                          | N/A                                      |
| Chloroform                                   | N/A                   | —  | 1.7      | —        | 1.9      | N/A                                    | 2.0  | 5.9      | 2.7      | —        | 10                          | 624                          | 1.6                                      |
| Bis(2-ethylhexyl)<br>phthalate               | N/A                   | 44   | 38       | 13       | 15       | N/A                                    | 12   | —        | 11       | 7.7      | 10                          | 625                          | 2.5                                      |
| Di-N-butyl<br>phthalate                      | N/A                   | —  | —        | —        | —        | N/A                                    | —  | 2.6      | —        | —        | 10                          | 625                          | 2.5                                      |
| Phenol                                       | N/A                   | —  | —        | —        | 10       | N/A                                    | —  | —        | —        | —        | 10                          | 625                          | 1.5                                      |
| Toluene                                      | N/A                   | —  | 31       | —        | —        | N/A                                    | —  | —        | —        | —        | 10                          | 624                          | 6  |

- (1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. **Analytical MQLs must be met for the effluent (and SHOULD be met for the influent data can also be used for Local Limits assessment and NPDES application purposes.**
- (2) This value was calculated during the development of TBL based on State WQ criteria, EPA guidance and ADEQ Pretreatment staff Excel spreadsheets.
- (3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the quantity at which they were detected.

MAHL - Maximum Allowable Headworks Level

WQ - "Water Quality Levels not to exceed" OR actual permit limit.



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

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Mr. Allen Gilliam  
Engineer II - Pretreatment Program  
Water Division, Permits Branch  
ADEQ  
5301 Northshore Drive  
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