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March 16, 2021

Pretreatment Program Submittals
Arkansas Department of Energy and Environment
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Pretreatment Program Status Report
NPDES Permit No. AR0033766

As required by Paragraph D on Page 5 of Part II of NPDES permit AR0033766, Paragould Light Water and Cable (PLWC) is submitting to you the annual list of industrial dischargers who have significantly violated pretreatment requirements. PLWC is also submitting an updated pretreatment program status report.

Using EPA Region 6 revised criteria for significant violation, there were no significant violators to the PLWC sewer system from March 1, 2021 to February 28, 2022. 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 IUs were in SNC. The PLWC pretreatment year begins on March 1.

Since 1995, PLWC has recognized industrial facilities achieving 100% compliance with both wastewater effluent limitations and reporting requirements during a calendar year. Facilities and their representatives are presented with a Pretreatment Award during one of the monthly meetings of the PLWC Board of Commissioners. For the year 2021, 5 out of the 9 permitted industries were eligible to receive the pretreatment award.

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

Sincerely,

Darrell Phillips
General Manager/CEO

Enclosures

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

Cc: Ms. Christina McCutcheon

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2021 TO February 28, 2022
TREATMENT PLANT: Paragould Light, Water & Cable; City of Paragould, Arkansas NPDES PERMIT #AR0033766
AVERAGE POTW FLOW: 3.116 MGD % IU FLOW: 19.1 %

METALS, CYANIDE and PHENOLS	MAHC (Total) (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l) Once/quarter				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED (µg/l) Once/quarter				LABORATORY ANALYSIS		
		Date	Date	Date	Date		Date	Date	Date	Date	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		04/13/2021	07/13/2021	10/05/2021	01/11/2022		04/13/2021	07/13/2021	10/05/2021	01/11/2022			
Antimony	N/A	<2.08	<2.08	<2.00	<2.08	N/A	<2.08	<2.08	<2.00	<2.08	60	200.8, Rev. 5.4	2.08/2.00
Cadmium	7.94	<0.260	0.260	0.495	<0.260	4.0	<0.260	<0.260	<0.250	<0.260	0.5	200.8, Rev. 5.4	0.260/0.250
Copper	226.73	22.2	35.9	60.3	22.6	29.5	5.88	3.57	4.57	5.65	0.5	200.8, Rev. 5.4	0.395/0.380
Lead	30	2.98	3.07	1.42	1.27	11.	<0.260	<0.260	<0.250	<0.260	0.5	200.8, Rev. 5.4	0.260/0.250
Mercury	0.27	0.00141	<0.000500	0.00284	0.0203	0.01	<0.0005	0.000628	0.00103	0.000974	0.005	1631E	0.0005
Nickel	65.4	24.2	8.13	6.73	3.67	322.7	3.38	2.87	3.39	2.73	0.5	200.8, Rev. 5.4	0.52/0.50
Selenium	11.16	<5.20	<5.00	<4.75	<4.94	5.6	<5.20	<5.00	<4.75	<4.94	5	200.8, Rev. 5.4	5.2/4.75/4.94
Silver	138.1	<0.312	<0.312	<0.300	<0.312	6.9	<0.312	<0.312	<0.300	<0.312	0.5	200.8, Rev. 5.4	0.312/0.300
Zinc	500	228	272	208	156	281.9	68.8	42.3	36.3	36.6	20	200.8, Rev. 5.4	20.8/20.0
Chromium	239.28	14.4	11.8	5.06	3.30	816.8	0.364	0.435	0.500	0.617	10	200.8, Rev. 5.4	0.260/0.250
Cyanide	18.72	<10 (04/28/21)	<10	<10	10	5.8	<10 (04/28/21)	<10	<10	<10	10	4500-CN B, E - 1999	10
Arsenic	10.9	0.927	4.37	1.45	0.858	390.5	1.09	1.18	1.43	1.13	0.5	200.8, Rev. 5.4	0.260/0.250
Molybdenum	23.26	10.0	4.63	13.4	7.04	N/A	7.39	7.24	6.54	7.17	--	200.8, Rev. 5.4	0.603/0.580
Phenols	N/A	54.6	23.9	50.6	22.6	N/A	<5	<5	<5	<5	5	420.1-1978	5
Beryllium	11.83	<0.260	<0.260	<0.250	<0.260	5.915	<0.260	<0.260	<0.250	<0.260	0.5	200.8, Rev. 5.4	0.260/0.250
Thallium	N/A	<0.260	<0.260	<0.250	<0.260	N/A	<0.260	<0.260	<0.250	<0.260	0.5	200.8, Rev. 5.4	0.260/0.250
Flow, MGD	N/A	3.096	2.784	2.676	3.049	N/A	3.910	3.424	3.569	3.556			
(3)													
Phenol								25.7				EPA 625.1-2016	0.348

(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) so the data can also be used for Local Limits assessment and NPDES application purposes.**

(2) This value was calculated during the development of TBLI based on State WQ criteria, EPA guidance and either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff.

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.

MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration

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

ATTACHMENT A
PRETREATMENT PROGRAM STATUS REPORT
UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User Name	SIC/NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (N/A, C, NC, or SNC)				Permit Limits (denote parameter violated & number of times)
			Y/N	Last Action				Reports				
								BMR	90-day Compliance	Semi Annual	Self Monitoring	
Allen Engineering 819 S. 5 th St. Paragould, AR 72450	333120	40 CFR 433.17	Y	10/01/2019	N	1	15	N/A	N/A	C	N/A	NC 1 Zinc Monthly Average Limit
AMMC* 900 W. Kingshighway PO Box 339 Paragould, AR 72450	622110	N/A*	Y	08/01/2021	N	1	5	N/A	N/A	N/A	N/A	C
DRiV Automotive** 1601 Hwy. 49B Paragould, AR 72450	3714	40 CFR 433	Y	12/01/2020	N	1	18	N/A	N/A	C	N/A	C
GRT Rubber Tech. 201 Dana Drive Paragould, AR 72450	32622 339991 326291 31332	40 CFR 428 Subpart G	Y	05/01/2021	N	1	17	N/A	N/A	C	N/A	NC 4 Oil & Grease Daily Limit
LA Darling Company 1401 Hwy. 49B North Paragould, AR 72450	337215	40 CFR 433.17	Y	05/01/2017	N	1	31	N/A	N/A	C	N/A	C

*AMMC is a Healthcare Facility and a Non-Categorical Significant Industrial User.

**DRiV Automotive was formerly known as Tenneco Automotive. There were no changes in processes or operations in the facility.

REVISED 03/10/2022

ATTACHMENT B
PRETREATMENT PROGRAM STATUS REPORT
NON-SIGNIFICANT PERMITTED INDUSTRIAL USERS LIST

Industrial User	SIC Code	Categorical Determination	Control Document		New User	Times Inspected	Times Sampled	Permit Limit Violations	Compliance Status (C, NC, or SNC)				
			Y/N	Last Action					Reports				Permit Limits
									BMR	90-day Compliance	Semi Annual**	Self Monitoring*	
Martin Sprocket and Gear, Inc. 1205 South Third Avenue Paragould, AR 72450	2899 3089 3569	Metal Finishing & Plastics Molding and Forming (No Process Discharge)	Y	05/01/2018	N	1	4	None	N/A	N/A	C	N/A	C
Nidec Motor Co. Pekin & Scott St. PO Box 520 Paragould, AR 72450	3621	40 CFR 464.15 (b), (c), (h) (No Process Discharge)	Y	04/01/2020	N	1	13	2 Oil & Grease Daily Limit	N/A	N/A	C	N/A	NC
Parker Trutec MMI 2609 North 12 th Avenue P.O. Box 757 Paragould, AR 72450	332811	Non-Categorical	Y	07/01/2021	N	0	16	3 pH Daily Max Limit	N/A	N/A	N/A	N/A	NC
Prysmian Cable & Systems LLC*** One Prestolite Road P.O. Box 1632 Paragould, AR 72450	3357 3471	Metal Finishing (No Process Discharge)	Y	04/01/2021	N	1	3	None	N/A	N/A	C	N/A	C

Include NAICS Code(s)
3rd column - include the CFR # only if the Category has Pretreatment Standards (number or narrative).
Please footnote N/A reason.

*PLWC conducts all sampling and monitoring for the IU, including TTO and PPS.

**For this report, Semi-Annual Reports refers to BMP, TTO and/or No Discharge Certification Statements.

***Prysmian Cable & Systems LLC was formerly known as General Cable Paragould. There were no changes in processes or operations in the facility.

REVISED 03/10/2022

ATTACHMENT C
SIGNIFICANT NON-COMPLIANT (SNC) INDUSTRIES - ENFORCEMENT ACTIONS TAKEN

Industrial User Name	Nature of Violation		Number of Actions Taken					Penalties Collected	Compliance Schedule		Current Status	Comments
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other		Date Issued	Date Due		
Not Applicable												

**ATTACHMENT D
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, 2021 February 28, 2022
 (Beginning Month and Year) (Ending Month and Year)
 Total Number of Categorical IUs 4
 Total Number of Significant Non-Categorical IUs 1
 Total Number of Non-Significant Permitted IUs 4
 Total Number of SSOs due to grease blockages 2 (Roots & Grease)

II. Significant Industrial User Compliance

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

III. Compliance Monitoring Program

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>Non Categorical</u>
1) No. of Control Documents Issued/Total No. Required.	<u>4 / 4</u>	<u>1 / 1</u>
2) No. of Non-sampling Inspections Conducted. .	<u>4</u>	<u>1</u>
3) No. of Sampling Visits Conducted.	<u>81</u>	<u>5</u>
4) No. of Facilities Inspected (non-sampling) .	<u>4</u>	<u>1</u>
5) No. of Facilities Sampled	<u>4</u>	<u>1</u>

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>Non-Categorical</u>
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>5</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>

V. Non-Significant Permitted Industrial User Compliance

1) No. of Permits Issued.	<u>4</u>
2) No. of Sampling Visits Conducted.	<u>36</u>
3) No. of Facilities Inspected (non-sampling)	<u>3</u>
4) No. of Facilities Sampled	<u>4</u>

VI. Non-Significant Permitted Industrial Enforcement Actions

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

Danell Plully
Authorized Representative

3/16/2022
Date