

March 29, 2024

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 Municipal Utilities (PMU) is submitting to you the annual list of industrial dischargers who have significantly violated pretreatment requirements. PMU 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 PMU sewer system from March 1, 2023 to February 29, 2024. 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 PMU pretreatment year begins on March 1.

Since 1995, PMU 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 PMU Board of Commissioners. For the year 2023, 7 out of the 9 permitted industries were eligible to receive the pretreatment award.

If you need any additional information, please contact me at [dromine@paragould.com](mailto:dromine@paragould.com) or (870) 239-7723.

Sincerely,



David Romine  
Chief Operations Officer

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

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: 2023 TO 2024**  
**TREATMENT PLANT: Paragould Municipal Utilities; City of Paragould, Arkansas NPDES PERMIT #AR0033766**  
**AVERAGE POTW FLOW: 3.345 % IU FLOW: 22.8 %**

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)
		4/12/23	7/12/23	10/18/23	2/21/24		4/12/23	7/12/23	10/18/23	2/21/24			
Antimony	N/A	<2.08	<2.08	<2.08	<2.08	N/A	<2.08	<2.08	<2.08	<2.08	60	200.8, Rev. 5.4	2.08
Cadmium	7.94	<0.260	0.333	<0.260	<0.260	4.0	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260
Copper	226.73	52.8	41.7	44.3	41.8	29.5	4.07	5.89	3.91	3.21	0.5	200.8, Rev. 5.4	0.395/0.520
Lead	30	2.07	1.08	1.30	1.00	11.	<0.260	<0.260	<0.416	<0.416	0.5	200.8, Rev. 5.4	0.260/0.416
Mercury	0.27	0.021	0.00835	0.011	0.00341	0.01	0.000874	<0.00050	0.00118	<0.0020	0.005	1631 E	0.0005/0.002
Nickel	65.4	6.99	6.06	5.60	5.59	322.7	2.12	2.76	0.92	1.99	0.5	200.8, Rev. 5.4	0.52/1.56
Selenium	11.16	<4.94	<4.94	<4.94	<4.94	5.6	<4.94	<4.94	<4.94	<4.94	5	200.8, Rev. 5.4	4.94
Silver	138.1	<0.312	<0.312	<0.312	<0.312	6.9	<0.312	<0.312	<0.312	<0.312	0.5	200.8, Rev. 5.4	0.312
Zinc	500	186	185	137	113	281.9	22.9	48.1	32.2	32.9	20	200.8, Rev. 5.4	20.8
Chromium	239.28	5.53	4.79	5.75	3.98	816.8	0.434	0.356	0.513	0.567	10	200.8, Rev. 5.4	0.260
Cyanide	18.72	<10	<10	<10	<10	5.8	<10	<10	<10	<10	10	4500-CN B, E 2016	10
Arsenic	10.9	1.13	1.12	0.682	1.05	390.5	0.843	1.28	0.443	0.724	0.5	200.8, Rev. 5.4	0.260
Molybdenum	23.26	43.3	8.12	8.55	5.54	N/A	30.8	5.82	4.30	3.64	--	200.8, Rev. 5.4	0.603
Phenols	N/A	57.4	44.8	90.1	46.3	N/A	<5	<5	<5	<5	5	420.1-1978	5
Beryllium	11.83	<0.260	<0.260	<0.260	<0.260	5.915	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260
Thallium	N/A	<0.260	<0.260	<0.260	<0.260	N/A	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260
Flow, MGD	N/A	2.826	2.733	2.469	2.812	N/A	3.675	3.196	3.089	3.274			
(3)													

(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 TBLL 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 <sup>th</sup> St. Paragould, AR 72450	333120	40 CFR 433.17	Y	10/01/2019	N	1	10	N/A	N/A	C	N/A	C
AMMC* 900 W. Kingshighway PO Box 339 Paragould, AR 72450	622110	N/A*	Y	08/01/2021	N	1	3	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	19	N/A	N/A	C	N/A	NC 2 Oil & Grease Daily Limit
GRT Rubber Tech. 201 Dana Drive Paragould, AR 72450	32622 339991 326291 31332	40 CFR 428 Subpart G	Y	05/01/2021	N	1	20	N/A	N/A	C	N/A	C
LA Darling Company 1401 Hwy. 49B North Paragould, AR 72450	337215	40 CFR 433.17	Y	05/01/2022	N	1	33	N/A	N/A	C	N/A	NC 1 pH Daily Limit

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

REVISED DATE 03/28/2024

**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	0	3	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	0	5	NONE	N/A	N/A	C	N/A	C
Parker Trutec MMI 2609 North 12 <sup>th</sup> Avenue Paragould, AR 72450	332811	Non-Categorical	Y	07/01/2021	N	0	13	NONE	N/A	N/A	N/A	N/A	C
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	0	4	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.

\*PMU 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.

REVISED DATE 03/28/2024

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

Industrial User Name	Nature of Violation		Number of Action Taken					Penalties Collected	Compliance Schedule		Current Status	Comments
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other		Date Issued	Date Due		

**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 Municipal Utilities

Address P.O. Box 9

City Paragould State/Zip Arkansas 72450

Contact Person David Romine Position Chief Operations Officer

Contact Telephone (870)239-7723 NPDES Permit Nos. AR0033766

Reporting Period March 1, 2023 February 29, 2024  
 (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

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

III. Compliance Monitoring Program

	<u>SIGNIFICANT CATEGORICAL</u>	<u>INDUSTRIAL USERS 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>82</u>	<u>3</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 CATEGORICAL</u>	<u>INDUSTRIAL USERS 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>3</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>25</u>
3) No. of Facilities Inspected (non-sampling) . . . . .	<u>0</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>0</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."

 3/29/2024  
 Authorized Representative Date

## Alan Anderson (adpce.ad)

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**From:** Alan Anderson (adpce.ad)  
**Sent:** Wednesday, May 1, 2024 12:58 PM  
**To:** 'David Romine'  
**Subject:** RE: PMU 2024 PPS Report

Mr. Romine:

The Paragould Municipal utilities March 1, 2023 through February 29, 2024 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 C.F.R. § 403.12(i). If you have any questions, please feel free to contact me.

Alan Anderson, MPA | Pretreatment and Enforcement Coordinator  
Division of Environmental Quality | Office of Water Quality  
Enforcement Section  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 501.682.0635 | c: 501.837.6954 | e: alan.anderson@example.com



**ARKANSAS**  
ENERGY & ENVIRONMENT

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**From:** David Romine <dromine@paragould.com>  
**Sent:** Friday, March 29, 2024 11:28 AM  
**To:** Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>; Pretreatment-Submittals <Pretreatment-Submittals@adeq.state.ar.us>; christina.McCutcheon@adeq.state.ar.us  
**Cc:** Brett Bradford <brettb@paragould.com>; Tiffani Newsom <tnewsom@paragould.com>; Colin Hester <chester@paragould.com>  
**Subject:** PMU 2024 PPS Report

Please find attached the annual 2024 PPS report for PMU for reporting period of March 1, 2023 thru February 29, 2024. If you would like the original mailed out to you just let me know. If you have any questions or need any additional information, please let me know. Thank you

**PMU**  
**PARAGOULD**  
MUNICIPAL UTILITIES

**David Romine PE**  
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