### Peltier, Hannah

From: Gilliam, Allen

**Sent:** Friday, March 13, 2015 1:37 PM paragould lisa ellington

Cc: Fuller, Kim; Peltier, Hannah; Ramsey, David; Kaelin, Cynthia; Anderson, Alan

**Subject:** AR0033766\_Paragould Light Water and Cables March 2015 annual Pretreatment report

with ADEQ reply\_20150313

Sorry Lisa, the subject line should have read PLW&C's March 2015 annual pretreatment report.

#### Allen g

From: Gilliam, Allen

Sent: Friday, March 13, 2015 12:15 PM

To: paragould lisa ellington

Cc: Fuller, Kim; Peltier, Hannah; Ramsey, David; Kaelin, Cynthia; Anderson, Alan

Subject: AR0033766\_Paragould Light Water and Cables Feb March 2015 annual Pretreatment report with ADEQ

reply\_20150313

Lisa,

Paragould Light Water and Cable's (PLW&C) March 2015 annual Pretreatment report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i). There are no further actions deemed necessary at this time.

Thank you for your timely report remaining in compliance with the Federal Pretreatment Regulations in 40 CFR 403.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Lisa Ellington [mailto:lellington@paragould.com]

**Sent:** Tuesday, March 10, 2015 2:03 PM

To: Gilliam, Allen Subject: PPS Report

Allen,

As required by our permit, attached is our annual list of industrial dischargers along with the Pretreatment Program Status Report, Pretreatment Performance Summary and Influent and Effluent monitoring results summary for the monitoring period March 1, 2014 to February 28, 2015. There were no industrial dischargers to the Paragould collection system who significantly violated pretreatment requirements.

If you require additional information or would like a hardcopy of this report, please do not hesitate to contact me. Thank you.

Lisa Ellington
Environmental Services Manager
Paragould Light, Water & Cable
P.O. Box 9
Paragould, AR 72450
Phone (870) 239-7795
Fax (870) 239-7791
lellington@paragould.com



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

March 10, 2015

Mr. Allen Gilliam State Pretreatment Coordinator ADEQ 5301 Northshore Drive North Little Rock, AR 72118-5317

Re:

Pretreatment Program Status Report

NPDES Permit No. AR0033766

Dear Mr. Gilliam:

As required by Page 5 of Part II 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 violators to our sewer system from March 1, 2014 to February 28, 2015. 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 2014, 6 out of the 9 permitted industries were eligible to receive this award.

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

Sincerely, Warrell Philly

Darrell Phillips

General Manager/CEO

Enclosures

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

### MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT

### REPORTING YEAR: March 1, 2014 TO February 28, 2015 TREATMENT PLANT: City of Paragould NPDES PERMIT #AR0033766

AVERAGE POTW FLOW: 2.942 MGD % IU FLOW: 12.1%

| METALS,                     |                       | Г        | NFLUENT DA | TES SAMPLE                  | D        | WQ                               | El                     | FFLUENT DA | LABORATORY ANALYSIS  |                              |  |       |        |
|-----------------------------|-----------------------|----------|------------|-----------------------------|----------|----------------------------------|------------------------|------------|----------------------|------------------------------|--|-------|--------|
| CYANIDE and PHENOLS (Total) | MAHC<br>(μg/l)<br>(2) | 04/22/14 |            | g/l)<br>quarter<br>10/08/14 | 01/21/15 | level/<br>limit<br>(µg/l)<br>(2) | (μg/l)<br>Once/quarter |            | EPA<br>MQL<br>(μg/l) | EPA<br>Method<br>Used<br>(1) | Detection<br>Level<br>Achieved<br>(µg/l) |       |        |
|                             |                       |          |            |                             |          |                                  |                        | 07/09/14   |                      | 01/21/15                     | (1)                                      | ` ′   |        |
| Antimony                    | N/A                   | <60      | <60        | <60                         | <60      | N/A                              | <60                    | <60        | <60                  | <60                          | 60                                       | 200.7 | 60     |
| Cadmium                     | 7.94                  | <0.5     | <0.5       | <0.5                        | <0.5     | 4.0                              | <0.5                   | <0.5       | <0.5                 | <0.5                         | 0.5                                      | 200.8 | 5      |
| Copper                      | 226.73                | 33       | 5.5        | 28                          | 33       | 29.5                             | 51                     | 27         | 7.7                  | 8.4                          | 0.5                                      | 200.8 | 0.5    |
| Lead                        | 30                    | 0.90     | < 0.5      | 1.1                         | 1.9      | 11.7                             | < 0.5                  | 0.82       | <0.5                 | 0.54                         | 0.5                                      | 200.8 | 0.5    |
| Mercury                     | 0.27                  | 0.016    | 0.0032     | 0.018                       | 0.030    | 0.01                             | < 0.0018               | <0.0018    | <0.0018              | < 0.0050                     | 0.005                                    | 245.7 | 0.0018 |
| Nickel                      | 65.4                  | 4.6      | 2.8        | 3.2                         | 3.1      | 322.7                            | 30                     | 2.9        | 2.9                  | 1.9                          | 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                 | <0.5     | <0.5       | <0.5                        | <0.5     | 6.9                              | <0.5                   | <0.5       | <0.5                 | <0.5                         | 0.5                                      | 200.8 | 0.5    |
| Zinc                        | 500                   | 93       | 44         | 65                          | 72       | 281.9                            | 150                    | 59         | 51                   | 58                           | 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                  | 2.0      | 0.91       | 0.92                        | 0.87     | 390.5                            | 1.0                    | 0.96       | 0.71                 | 0.54                         | 0.5                                      | 200.8 | 0.5    |
| Molybdenum                  | 23.36                 | <8       | <8         | <8                          | <8       | N/A                              | <8                     | <8         | <8                   | <8                           |  | 200.8 | 8      |
| Phenolics                   | N/A                   | 41       | 58         | 230                         | 77       | N/A                              | <5                     | 5.1        | <5                   | 28                           | 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       | <0.5                        | <0.5     | N/A                              | <0.5                   | <0.5       | <0.5                 | <0.5                         | 0.5                                      | 200.8 | 0.5    |
| Flow, MGD                   | N/A                   | 2.887    | 2.665      | 2.635                       | 2.761    | N/A                              | 2.657                  | 2.403      | 2.227                | 2.385                        | N/A                                      | N/A   | N/A    |
| (3)                         |                       |          |            |                             |          |                                  |                        |            |                      |                              |  |       |        |
| Methylene Chloride          |                       |          |            |                             | 23       |                                  |                        |            |                      |                              |  |       |        |
| Bis(2-ethylhexyl) Phthalate |                       |          |            |                             | 21       |                                  |                        |            |                      |                              |  |       |        |
| Phenol                      |                       |          |            |                             | 20       |                                  |                        |            |                      |                              |  |       |        |
|                             |                       |          |            |                             |          |                                  |                        |            |                      |                              |  |       |        |
|                             |                       |          |            |                             |          |                                  |                        |            |                      |                              |  |       |        |
|                             |                       |          |            |                             |          |                                  |                        |            |                      |                              |  |       |        |
|                             |                       |          |            |                             |          |                                  |                        |            |                      |                              |  |       |        |
|                             |                       |          |            |                             |          |                                  |                        |            |                      |                              |  |       |        |
|                             |                       |          |            |                             |          |                                  |                        |            |                      |                              |  |       |        |
|                             |                       | L        |            |                             |          |                                  |                        |            |                      |                              |  | L     |        |

<sup>(1)</sup> It is advised that the influent and effluent samples are collected considering flow detention time through 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.

MAHL - Maximum Allowable Headworks Level

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

<sup>(2)</sup> This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and ADEQ Pretreatment staff Excel spreadsheets.

<sup>(3)</sup> 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.

### ATTACHMENT A PRETREATMENT PROGRAM STATUS REPORT SIGNIFICANT INDUSTRIAL USERS LIST

|  |                                    |   | Control<br>Document |                | New<br>User | Times<br>Inspected | Times<br>Sampled | Permit<br>Limit<br>Violations                            | Compliance Status (C, NC, or SNC) |                      |                |                    |         |
|--|------------------------------------|---|---------------------|----------------|-------------|--------------------|------------------|--|-----------------------------------|----------------------|----------------|--------------------|---------|
| Industrial User  | SIC/NAICS<br>Code                  | Categorical<br>Determination                                |                     |                |             |                    |                  |  | Reports**                         |                      |                | Permit             |         |
|  |                                    |   | Y/N                 | Last<br>Action |             |                    |                  |  | BMR                               | 90-day<br>Compliance | Semi<br>Annual | Self<br>Monitoring | Limits  |
| Allen Engineering<br>819 South 5 <sup>th</sup> Street<br>Paragould, AR 72450         | 333120                             | 40 CFR 433.17<br>(Metal Finishing)                          | Y                   | 10/01/2014     | Y           | 1                  | 10               | N/A  | Y                                 |                      |                |                    | С       |
| AMMC<br>900 West Kingshighway<br>P.O. Box 339<br>Paragould, AR 72450                 | 622110                             | Non-Categorical<br>(Health Care<br>Facility)                | Y                   | 08/01/2011     | N           | 1                  | 4                | N/A  | N/A                               | N/A                  | *              |                    | С       |
| Garlock Rubber Technologies<br>201 Dana Drive<br>Paragould, AR 72450                 | 32622<br>339991<br>326291<br>31332 | 40 CFR 428, Subpart G<br>(Extruded &<br>Fabricated Rubber)  | Y                   | 05/01/2011     | N           | 1                  | 11               | N/A  | N/A                               | N/A                  | *              |                    | С       |
| L.A. Darling<br>1401 Highway 49B North<br>Paragould, Arkansas 72450                  | 337215                             | 40 CFR 433.17<br>(Metal Finishing)                          | Y                   | 02/01/2012     | N           | 1                  | 31               | 1 Daily<br>Limit Oil &<br>Grease                         | N/A                               | N/A                  | *              |                    | ,<br>NC |
| Nidec Motor Company<br>Pekin and Scott Street<br>P.O. Box 520<br>Paragould, AR 72450 | 3621                               | 40 CFR 464.15 (b),<br>(c), and (h)<br>(Aluminum Diecasting) | Y                   | 02/01/2015     | N           | 1                  | 30               | 1 Monthly Limit<br>Zinc;<br>1 Monthly Limit<br>Phenolics | N/A                               | N/A                  | *              | С                  | NC      |
| Tenneco Automotive<br>1601 Highway 49B<br>Paragould, AR 72450                        | 3714                               | 40 CFR Part 433<br>(Metal Finishing)                        | Y                   | 02/06/2012     | N           | 1                  | 14               | N/A  | N/A                               | N/A                  | •              |                    | С       |

Include NAICS Code(s)

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

03/09/2015

<sup>\*</sup>PLWC does the sampling and monitoring for the IU. \*\*N/A for Compliance Reports signifies those industries are not required to submit those reports to PLWC.

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

|  |                      | Categorical<br>Determination   | Co       | ontrol         |             |                    |                  |                               | Compliance Status (C, NC, or SNC) |                      |                |                    |        |  |
|--|----------------------|--|----------|----------------|-------------|--------------------|------------------|-------------------------------|-----------------------------------|----------------------|----------------|--------------------|--------|--|
| Industrial User  | SIC<br>Code          |  | Document |                | New<br>User | Times<br>Inspected | Times<br>Sampled | Permit<br>Limit<br>Violations |                                   | Permit               |                |                    |        |  |
|  |                      |  | Y/N      | Last<br>Action |             |                    |                  | VIOIGETONS                    | BMR                               | 90-day<br>Compliance | Semi<br>Annual | Self<br>Monitoring | Limits |  |
| Martin Sprocket and Gear,<br>Inc.<br>1205 South Third Avenue<br>Paragould, AR 72450            | 2899<br>3089<br>3569 | Metal Finishing<br>&<br>Plastics Molding<br>and Forming<br>(No Process<br>Discharge) | Y        | 05/24/2013     | N           | 1                  | 4                | N/A                           | N/A                               | N/A                  | *              |                    | С      |  |
| Parker Trutec MMI<br>2609 North 12 <sup>th</sup> Avenue<br>P.O. Box 757<br>Paragould, AR 72450 | 332811               | Non-Categorical  | Y        | 07/01/2011     | N           | 0                  | 5                | N/A                           | N/A                               | N/A                  | *              |                    | С      |  |
| General Cable Paragould<br>One Prestolite Road<br>F.O. Box 1632<br>Paragould, AR 72450         | 3357<br>3471         | Metal Finishing<br>(No Process<br>Discharge)   | Y        | 07/11/2011     | N           | 1                  | 4                | N/A                           | N/A                               | N/A                  | *              |                    | С      |  |

Include NAICS Code(s)

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

<sup>\*</sup>PLWC does the sampling and monitoring for the IU. \*\*N/A for Compliance Reports signifies those industries are not required to submit those reports to PLWC.

# ATTACHMENT C SIGNIFICANT VIOLATIONS - ENFORCEMENT ACTIONS TAKEN

| To be dead of Trans         | Nature of<br>Violation |        |        | Numbe | r of Act: | ion Taken |       | Penalties | Compliance<br>Schedule |             | Current | Comments |
|-----------------------------|------------------------|--------|--------|-------|-----------|-----------|-------|-----------|------------------------|-------------|---------|----------|
| Industrial User             | Reports                | Limits | N.O.V. | A.O.  | Civil     | Criminal  | Other | Collected | Date<br>Issued         | Date<br>Due | Status  | comments |
| NO SIGNIFICANT<br>VIOLATORS |                        |        |        |       |           |           |       |           |                        |             |         |          |
|                             |                        |        |        |       | ***       |           |       |           |                        |             |         |          |
|                             | <u></u>                |        |        |       |           |           |       |           |                        |             |         |          |
|                             |                        |        |        |       |           |           |       |           |                        |             |         |          |
|                             |                        |        |        |       |           |           |       |           |                        |             |         |          |
|                             |                        |        |        |       |           |           |       |           |                        |             |         |          |
|                             |                        |        |        |       |           |           |       |           |                        |             |         |          |
|                             |                        |        |        |       |           |           |       |           |                        |             |         |          |
|                             |                        |        |        |       |           |           |       |           |                        |             |         |          |
|                             |                        |        |        |       |           |           |       |           |                        |             |         |          |
|                             |                        |        |        |       |           |           |       | , , , , , |                        |             |         |          |

## 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 A | Authority Name <u>City of Paragould, Paragould Light</u>                         | , Water & Cable                             |
|-----------|--|---|
| Address _ | P.O. Box 9   |   |
| City Par  | ragould State/Zip Arkansas   |   |
| Contact E | Person Lisa Ellington Position Environmental                                     | Services Manager                            |
| Contact 1 | Telephone (870) 239-7795 NPDES Permit Nos.                                       | AR0033766                                   |
| Reporting | g Period March 1, 2014 February (Beginning Month and Year) (Ending Month         | y 28, 2015<br>th and Year)                  |
| Total Num | mber of Categorical IUs5   |   |
| Total Num | mber of Significant Non-Categorical IUs1   |   |
| Total Num | mber of Non-Significant Permitted IUs3   | _   |
| Total Num | mber of SSOs due to grease blockages0  | _   |
|           | II. Significant Industrial User Complia  | ance  |
|           | SIGNIFIC Catego  | CANT INDUSTRIAL USERS rical Non-Categorical |
| 1)        | No. of SIUs Submitting BMRs/Total No. Required 1 /                               | <u> 1</u> <u> N/A*</u>                      |
| 2)        | No. of SIUs Submitting 90-Day Compliance Reports/No. Required                    | <u>N/A*</u>                                 |
| 3)        | No. of SIUs Submitting Semiannual Reports/ Total No. Required                    | 0/0   |
| 4)        | No. of SIUs Meeting Compliance Schedule/ Total No. Required to Meet Schedule 0   | 0/0   |
| 5)        | No. of SIUs in Significant Noncompliance/ Total No. of SIUs                      | <u>0 / 1</u>                                |
| 6)        | Rate of Significant Noncompliance for all SIUs (categorical and non-categorical) | 0 / 6                                       |

### III. Compliance Monitoring Program

|    |  | SIGNIFICANT | INDUSTRIAL USERS |
|----|--|-------------|------------------|
|    |  | Categorical | Non Categorical  |
| 1) | No. of Control Documents Issued/Total No. Required | 5 / 5       | 1 / 1            |
| 2) | No. of Non-sampling Inspections Conducted.         | 5           | 1                |
| 3) | No. of Sampling Visits Conducted                   | 96          | 4                |
| 4) | No. of Facilities Inspected (non-sampling)         | 5           | 1                |
| 5) | No. of Facilities Sampled                          | 5           | 1                |

### IV. Enforcement Actions

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

3-10-2015 Date

|    | V. Non-Significant Permitted Industrial User Compliance   |
|----|---|
| 1) | No. of Permits Issued   |
| 2) | No. of Sampling Visits Conducted  |
| 3) | No. of Facilities Inspected (non-sampling) 2  |
| 4) | No. of Facilities Sampled   |
|    | VI. Non-Significant Permitted Industrial Enforcement Actions  |
| 1) | No. of Notices of Violations Issued to IUs 0  |
| •  |   |
| 2) | No. of Administrative Orders Issued to IUs 0  |
| 3) | No. of Civil Suits Filed  |
| 4) | No. of Criminal Suits Filed 0   |
| 5) | No. of Significant Violators (attach newspaper publication)   |
| 6) | Amount of Penalties Collected (total dollars/IUs assessed)  |
| 7) | Other Actions (sewer bans, etc.)  |
|    | following certification must be signed in order for this form to be sidered complete.               |
|    | certify that the information contained herein is complete and accurate to the t of my knowledge." ` |

Authorized Representative