

From: [Yates, Adam](#)
To: [Lisa Ellington](#)
Cc: [Burrow, Kealey](#); [McWilliams, Carrie](#); [Healey, Richard](#); [Anderson, Alan](#)
Subject: RE: Annual PPS Report
Date: Wednesday, March 28, 2018 1:27:42 PM
Attachments: [AR0033766 Paragould Mar 2018 Pretreatment Program Annual Report 20180302.pdf](#)
[image001.png](#)

Lisa,

Paragould's March 2018 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant with the reporting requirements of 40 CFR 403.12(i). Thank you for your timely submittal. If you have any questions or concerns, please feel free to contact me.

Kindly,

Adam Yates
State Pretreatment Coordinator
Office of Water Quality
Arkansas Department of Environmental Quality
Phone: (501) 682-0617
Fax: (501) 682-0880

G:\Shared Folders\Water\Pretreatment\Reports

From: Lisa Ellington [mailto:l Ellington@paragould.com]
Sent: Friday, March 02, 2018 3:48 PM
To: Yates, Adam
Cc: Anderson, Alan
Subject: Annual PPS Report

Good afternoon Adam,

I hope all is well with you.

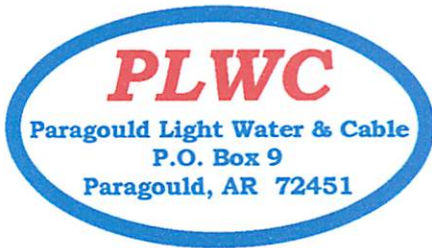
Attached is the annual Pretreatment Program Status Report for Paragould Light Water & Cable (PLWC) as required by NPDES Permit AR0033766. If you have questions or need additional information, do not hesitate to contact me.

Thank you, and have a great weekend.

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*





"One Team, One Goal...Customer Service"

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

March 2, 2018

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

Re: Pretreatment Program Status Report
NPDES Permit No. AR0033766

Dear Mr. Yates:

As required by 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, 2017 to February 28, 2018. 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. 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 2017, 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 lellington@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: Mr. Alan Anderson

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2017 TO February 28, 2018
TREATMENT PLANT: Paragould Light, Water & Cable; City of Paragould, Arkansas NPDES PERMIT #AR0033766
AVERAGE POTW FLOW: 3.048 MGD % IU FLOW: 11.3 %

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)
		04/04/17	07/12/2017	10/03/2017	01/09/2018		04/04/17	07/12/2017	10/03/2017	01/09/2018			
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	<0.260	<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	17.9	24.8	23.8	16.3	29.5	2.59	3.30	4.90	5.00	0.5	200.8, Rev. 5.4	0.260
Lead	30	0.552	1.03	0.701	1.51	11.	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260
Mercury	0.27	0.053	0.0482	0.0262	0.1	0.01	0.00305	0.00467	0.0063	0.00471	0.005	1631E	0.0002
Nickel	65.4	3.06	1.85	2.68	3.00	322.7	4.19	3.59	2.83	1.72	0.5	200.8, Rev. 5.4	0.260
Selenium	11.16	<2.08	<2.08	<2.08	<2.08	5.6	<2.08	<2.08	<2.08	<2.08	5	200.8, Rev. 5.4	2.08
Silver	138.1	<0.260	<0.260	<0.260	<0.260	6.9	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260
Zinc	500	50.6	81.0	58.7	149	281.9	42.5	36.3	44.5	57.0	20	200.8, Rev. 5.4	2.0
Chromium	239.28	1.20	1.58	2.48	2.79	816.8	0.758	<0.260	0.587	0.388	10	200.8, Rev. 5.4	0.3
Cyanide	18.72	<10	<10	<10	<10	5.8	<10	<10	<10	<10	10	4500-CN B, E - 1999	10
Arsenic	10.9	1.02	0.521	0.501	0.533	390.5	1.10	2.48	0.813	0.536	0.5	200.8, Rev. 5.4	0.260
Molybdenum	23.26	2.59	3.53	5.82	2.55	N/A	3.00	4.76	8.48	6.95	--	200.8, Rev. 5.4	0.260
Phenols	N/A	41	84.3	107	40.1	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	3.340	2.791	2.650	3.024	N/A	3.709	3.324	3.284	3.755			
(3)													
Phenol			15.3										

(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 th St. Paragould, AR 72450	333120	40 CFR 433.17	Y	10/01/2014	N	1	12	N/A	N/A	C	N/A	C
AMMC** 900 W. Kingshighway PO Box 339 Paragould, AR 72450	622110	N/A*	Y	08/01/2016	N	1	4	N/A	N/A	N/A	N/A	C
GRT Rubber Tech. 201 Dana Drive Paragould, AR 72450	32622 339991 326291 31332	40 CFR 428 Subpart G	Y	05/01/2016	N	1	13	N/A	N/A	C	N/A	NC 2 Daily limit Oil & Grease
LA Darling Company 1401 Hwy. 49B North Paragould, AR 72450	337215	40 CFR 433.17	Y	4/21/2017*	N	1	48	N/A	N/A	C	N/A	NC 1 Daily limit Zinc; 2 Monthly limit Zinc; 1 Daily limit Oil & Grease
Nidec Motor Co. Pekin & Scott St. PO Box 520 Paragould, AR 72450	3621	40 CFR 464.15 (b), (c), (h)	Y	02/01/2015	N	1	33	N/A	N/A	C	N/A	NC 1 Monthly limit Phenol
Tenneco Automotive 1601 Hwy. 49B Paragould, AR 72450	3714	40 CFR 433	Y	12/01/2015	N	1	15	N/A	N/A	C	N/A	NC 1 Daily limit Oil & Grease

*PLWC is currently working with LA Darling to renew the Industrial Waste Discharge Permit.
**AMMC is a Healthcare Facility and a Non-Categorical Significant Industrial User.

REVISED 03/02/2018

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	05/24/2013	N	0	3	None	N/A	N/A	C	N/A	C
Parker Trutec MMI 2609 North 12 th Avenue P.O. Box 757 Paragould, AR 72450	332811	Non-Categorical	Y	07/01/2016	N	0	4	None	N/A	N/A	N/A	N/A	C
General Cable Paragould One Prestolite Road P.O. Box 1632 Paragould, AR 72450	3357 3471	Metal Finishing (No Process Discharge)	Y	04/01/2016	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.

*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.

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		
NO SIGNIFICANT VIOLATORS												

**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, 2017 February 28, 2018
 (Beginning Month and Year) (Ending Month and Year)
 Total Number of Categorical IUs 5
 Total Number of Significant Non-Categorical IUs 1
 Total Number of Non-Significant Permitted IUs 3
 Total Number of SSOs due to grease blockages 0

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>5 / 5</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 / 5</u>	<u>0 / 1</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and non-categorical) . .	<u>0 / 6</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>5 / 5</u>	<u>1 / 1</u>
2) No. of Non-sampling Inspections Conducted. .	<u>5</u>	<u>1</u>
3) No. of Sampling Visits Conducted.	<u>121</u>	<u>4</u>
4) No. of Facilities Inspected (non-sampling) .	<u>5</u>	<u>1</u>
5) No. of Facilities Sampled	<u>5</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>8</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>3</u>
2) No. of Sampling Visits Conducted.	<u>11</u>
3) No. of Facilities Inspected (non-sampling)	<u>0</u>
4) No. of Facilities Sampled	<u>3</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."

Daniel Phully
 Authorized Representative

3-2-2018
 Date