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March 11, 2019

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, 2018 to February 28, 2019. 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 2018, 4 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 Brown

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2018 TO February 28, 2019
TREATMENT PLANT: Paragould Light, Water & Cable; City of Paragould, Arkansas NPDES PERMIT #AR0033766
AVERAGE POTW FLOW: 3.209 MGD % IU FLOW: 11.7 %

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)
		04/10/18	07/24/18	10/02/18	01/08/19		04/10/18	07/24/18 & 07/31/18	10/02/18	01/08/19			
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	0.315	0.307	0.633	0.369	4.0	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260
Copper	226.73	39.2	20.0	82.9	59.3	29.5	5.42	7.41	5.03	3.34	0.5	200.8, Rev. 5.4	0.260
Lead	30	1.75	2.52	4.49	1.70	11.	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260
Mercury	0.27	0.133	0.137	0.0984	0.305	0.01	0.0074	0.0263	0.00964	0.00475	0.005	1631E	0.0002
Nickel	65.4	5.51	11.5	6.61	5.68	322.7	2.57	3.19	2.52	1.62	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	0.348	<0.260	6.9	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260
Zinc	500	107	267	181	149	281.9	45.7	45.2	39.9	37.8	20	200.8, Rev. 5.4	2.0
Chromium	239.28	3.12	8.50	5.78	7.28	816.8	0.346	0.526	0.530	0.481	10	200.8, Rev. 5.4	0.3
Cyanide	18.72	<10	<10	<10	<10	5.8	<10	<10 (07/31/18)	<10	<10	10	4500-CN B, E - 1999	10
Arsenic	10.9	0.857	0.629	1.36	1.32	390.5	0.683	0.626	1.11	0.794	0.5	200.8, Rev. 5.4	0.260
Molybdenum	23.26	7.45	5.81	12.1	14.3	N/A	7.97	10.3	5.80	15.0	--	200.8, Rev. 5.4	0.260
Phenols	N/A	68.8	85.1	62.6	33	N/A	<5	<5 (07/31/18)	<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	2.704	2.567	2.900	3.290	N/A	3.468	2.880 2.913	3.453	3.990			
(3)													
Phenol								18.2					

is advised that the influent and effluent samples are collected considering flow detention time through each plant. **Analytical MQLs must be met for effluent (and SHOULD be met for the influent) so the data can also be used for Local Limits assessment and NPDES application purposes.**

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

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.

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

- "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	13	N/A	N/A	C	N/A	NC 1 Zinc Daily Limit
AMMC* 900 W. Kingshighway PO Box 339 Paragould, AR 72450	622110	N/A*	Y	08/01/2016	N	1	5	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	12	N/A	N/A	C	N/A	C
LA Darling Company 1401 Hwy. 49B North Paragould, AR 72450	337215	40 CFR 433.17	Y	05/01/2017	N	1	45	N/A	N/A	C	N/A	NC 3 Daily limit Zinc; 2 Monthly limit Zinc
Nidec Motor Co. Pekin & Scott St. PO Box 520 Paragould, AR 72450	3621	40 CFR 464.15 (b), (c), (h)	Y	05/01/2015	N	1	28	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	16	N/A	N/A	C	N/A	C

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

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				Per Lir
									BMR	90-day Compliance	Semi Annual**	Self Monitoring*	
tin Sprocket and r, Inc. 5 South Third ue agould, AR 72450	2899 3089 3569	Metal Finishing & Plastics Molding and Forming (No Process Discharge)	Y	05/01/2018	N	0	4	None	N/A	N/A	C	N/A	
ker Trutec MMI 9 North 12 th Avenue . Box 757 agould, AR 72450	332811	Non- Categorical	Y	07/01/2016	N	0	5	None	N/A	N/A	N/A	N/A	
eral Cable agould Prestolite Road . Box 1632 agould, AR 72450	3357 3471	Metal Finishing (No Process Discharge)	Y	04/01/2016	N	1	3	None	N/A	N/A	C	N/A	

e NAICS Code(s)
lumn - include the CFR # only if the Category has Pretreatment Standards (number or narrative).
footnote N/A reason.

conducts all sampling and monitoring for the IU, including TTO and PPS.
this report, Semi-Annual Reports refers to BMP, TTO and/or No Discharge Certification Statements.

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>114</u>	<u>5</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>7</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. 3
- 2) No. of Sampling Visits Conducted. 12
- 3) No. of Facilities Inspected (non-sampling) 1
- 4) No. of Facilities Sampled 3

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. 0
- 4) No. of Criminal Suits Filed 0
- 5) No. of Significant Violators (attach newspaper publication). 0
- 6) Amount of Penalties Collected (total dollars/IUs assessed) 0 / 0
- 7) Other Actions (sewer bans, etc.). 0

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."

Samuel Phillips 3-11-2019
Authorized Representative Date