

Paragould 2019 Pretreatment Program Annual Report

Yates, Adam

Tue 6/9/2020 4:54 PM

To: lellington@paragould.com <lellington@paragould.com>;

Cc: Healey, Richard <HEALEYR@adeq.state.ar.us>; Ramsey, David <RAMSEY@adeq.state.ar.us>; Allen-Daniel, Leslie <ALLEN-DANIEL@adeq.state.ar.us>; Brown, Christina <christina.brown@adeq.state.ar.us>;

Lisa,

Paragould Light, Water & Cable's March 2020 Pretreatment Program Annual Report was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 CFR 403.12(i).

Thank you for your timely submittal. If you have any questions or concerns on this matter, please feel free to contact me.

Kindly,

Adam Yates | State Pretreatment Coordinator

Division of Environmental Quality | Office of Water Quality

5301 Northshore Drive | North Little Rock, AR 72118

t: (501) 682-0617 | e: yates@adeq.state.ar.us



P.O. Box 9
Paragould, AR 72451

Ph: 870.239.7700
Fax: 870.239.7798
paragould.com

March 16, 2020

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 two significant violators to the PLWC sewer system from March 1, 2019 to February 29, 2020. 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 2019, 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 l 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
SNC Publication

Cc: Ms. Christina Brown

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2019 TO February 29, 2020
TREATMENT PLANT: Paragould Light, Water & Cable; City of Paragould, Arkansas NPDES PERMIT #AR0033766
AVERAGE POTW FLOW: 3.497 MGD % IU FLOW: 10.2 %

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)
		04/02/19	07/023/19	10/08/19	01/21/20		04/02/19	07/23/19	10/08/19	01/21/20			
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	0.273	<0.260	<0.260	0.847	4.0	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260
Copper	226.73	45.2	43.2	36.0	24.8	29.5	5.55	5.08	5.00	6.25	0.5	200.8, Rev. 5.4	0.260
Lead	30	2.81	1.20	1.29	0.839	11.	<0.260	<0.260	<0.260	0.260	0.5	200.8, Rev. 5.4	0.260
Mercury	0.27	0.0562	0.0792	0.0503	0.0244	0.01	0.00269	0.00299	0.00855	0.0108	0.005	1631E	0.0002
Nickel	65.4	3.72	4.58	4.35	2.58	322.7	1.88	2.48	1.63	1.87	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	0.286	<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	141	108	99.1	65.7	281.9	35.3	39.5	31.3	30.5	20	200.8, Rev. 5.4	2.0
Chromium	239.28	3.48	6.18	5.59	3.38	816.8	0.442	0.493	0.593	0.636	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	1.10	1.06	1.06	0.836	390.5	0.871	1.16	1.64	0.972	0.5	200.8, Rev. 5.4	0.260
Molybdenum	23.26	9.97	11.2	23.4	8.98	N/A	7.75	8.06	13.2	7.30	--	200.8, Rev. 5.4	0.260
Phenols	N/A	63.2	71.4	40.4	34.5	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	2.688	4.036	2.603	3.218	N/A	3.416	3.022	2.984	3.817			
(3)		N/A	N/A	N/A	N/A		N/A		N/A	N/A			
Phenol								17			10	EPA 625	9.52

(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 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.

(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	14	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	14	N/A	N/A	C	N/A	NC 3 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	41	N/A	N/A	C	N/A	SNC 2 Daily limit Zinc; 1 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	29	N/A	N/A	C	N/A	SNC 1 Monthly limit Phenol; 4 Daily Limit Zinc; 4 Monthly Limit Zinc
Tenneco Automotive 1601 Hwy. 49B Paragould, AR 72450	3714	40 CFR 433	Y	12/01/2015	N	1	17	N/A	N/A	C	N/A	NC 1 Daily Limit Oil & Grease

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

REVISED 03/05/2020

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	5	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	7	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	5	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		
LA Darling Company	----	X	3	0	0	0	0	0	0	0	C	LA Darling has shut down the non-compliant process line
Nidec Motor Company	----	X	9	0	0	0	0	0	0	0	C	Nidec no longer discharges process wastewater; permit is being updated to reflect the change

**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, 2019 February 29, 2020
 (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 1

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>2 / 5</u>	<u>0 / 1</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and non-categorical) . .	<u>2 / 6</u>	

III. Compliance Monitoring Program

	<u>SIGNIFICANT</u> <u>Categorical</u>	<u>INDUSTRIAL USERS</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>119</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</u> <u>Categorical</u>	<u>INDUSTRIAL USERS</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>16</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>2</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>17</u>
3) No. of Facilities Inspected (non-sampling)	<u>1</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."

Garrett Kelly
Authorized Representative

3/16/2020
Date

PROOF OF PUBLICATION

STATE OF ARKANSAS
COUNTY OF GREENE

I, Lisa A. Lynn, do solemnly
swear that I am Lisa A. Lynn

of DAILY PRESS, INC. that publishes the Paragould Daily Press, a daily newspaper published in Paragould, Greene County, Arkansas; that I was such Advertising Director during the publication of the attached and that said newspaper has been regularly printed in said county and had a bona fide circulation therein for one month prior to the publication of said advertisement, and that same was published in said paper 1 times; the first insertion being on the 3 day of March, 2020 and the last insertion being on the _____ day of _____, 20 ____.


Lisa A. Lynn

Subscribed and sworn to before me the 3 day of
March, 2020.


Barbara Ann Reichardt, Notary Public

My commission expires March 1, 2021.

Printer's fee	\$	<u>51.75</u>
Affidavit	\$	<u>1.00</u>
Total	\$	<u>52.75</u>



Date MARCH 3, 2020

As directed by the U.S. Environmental Protection Agency and the Arkansas Department of Environmental Quality, the Paragould Light and Water Commission is required to publish a list of significant violators to the Paragould Light, Water and Cable (PLWC) Pretreatment Program in accordance with 40 CFR 403. The General Pretreatment Regulations and the PLWC National Pollutant Discharge Elimination System (NPDES) permit. During the reporting period of March 2019 through February 2020, two facilities were in significant violation of the permitted pollutant limitations: L.A. Darling Company, LLC; 1401 Highway 49N; Paragould, AR 72450; and Nidec Motor Corporation, 1000 S. 2nd Avenue, Paragould, AR 72450. At the present time, L.A. Darling and Nidec Motor Corporation are in compliance.

Ad Number 90855460

Vendor: Daily Press
 Vendor No. 0390 Vendor Account No:
Invoice Number Date Description
 90855460 3/9/2020

Check Date: 03/12/2020
 Check Amount: 52.75
Invoice Amount
 52.75

DOCUMENT IS PRINTED ON CHEMICALLY REACTIVE PAPER - THE BACK OF THIS DOCUMENT INCLUDES A TAMPER EVIDENT CHEMICAL WASH WARNING BOX

100649

PARAGOULD LIGHT WATER & CABLE

(870) 239-7700
 P.O. BOX 9
 PARAGOULD, AR 72451-0009

FIRST NATIONAL BANK
 PARAGOULD, AR
 81-79/841

Date **Amount**
 03/12/2020 52.75

Pay: FIFTY-TWO AND 75 / 100

To the order of:
 Daily Press
 1401 West Hunt St
 Paragould, AR 72450

Lisa Holde

James Christopher

 AUTHORIZED SIGNATURE



⑈ 100649⑈ ⑆084100793⑆ 79⑈8000093⑈