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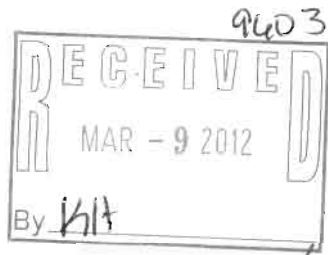


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March 7, 2012

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

AFIN 2800470

complete/compliant
no action deemed necessary
AE

Dear Mr. Gilliam:

As required by Part II, Page 5 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, 2011 to February 29, 2012. 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 2011, 4 out of the 6 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,
Darrell Phillips
Darrell Phillips
Assistant General Manager

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

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2011 TO February 29, 2012
TREATMENT PLANT: City of Paragould NPDES PERMIT #AR0033766
AVERAGE POTW FLOW: 3.192 MGD % IU FLOW: 11.56%

METALS, CYANIDE and PHENOLS (Total)	MAHC (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					
		04/05/11	07/26/11	10/20/11		01/17/12	04/05/11	07/26/11	10/20/11	01/17/12	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)	
Antimony	N/A	<60	<60	<60	N/A	<60	<60	<60	<60	<60	200.7	60	200.7	60
Cadmium	7.94	<0.5	<0.5	<0.5	4.0	<0.5	<0.5	<0.5	<0.5	<0.5	200.8	0.5	200.8	5
Copper	226.73	19	44	35	29.5	28	35	28	7.1	6.6	200.8	0.5	200.8	0.5
Lead	30	0.94	1.4	1.5	11.7	1.4	1.5	1.4	<0.5	<0.5	200.8	0.5	200.8	0.5
Mercury	0.27	<0.2	<0.2	<0.2	0.01	<0.2	<0.2	<0.2	0.0022	<0.0018	245.7	0.005	245.7	0.0018
Nickel	65.4	3.0	3.6	6.2	322.7	3.5	6.2	3.5	2.8	4.1	200.8	0.5	200.8	0.5
Selenium	11.16	<5	<5	<5	5.6	<5	<5	<5	<5	<5	200.8	5	200.8	5
Silver	138.1	<0.5	<0.5	0.54	6.9	<0.5	0.54	<0.5	<0.5	<0.5	200.8	0.5	200.8	0.5
Zinc	500	59	68	110	281.9	55	110	55	48	35	200.8	20	200.8	2.0
Chromium	239.28	<10	<10	<10	816.8	<10	<10	<10	<10	<10	200.8	10	200.8	10
Cyanide	18.72	<10	<10	<10	5.8	<10	<10	<10	<10	<10	335.2	10	335.2	10
Arsenic	10.9	0.67	0.90	0.70	390.5	<0.5	0.70	<0.5	0.86	0.56	200.8	0.5	200.8	0.5
Molybdenum	23.36	<8	<8	9.2	N/A	<8	9.2	<8	<8	<8	200.8	---	200.8	8
Phenols	N/A	33	59	34	N/A	85	34	85	<5	<5	420.1	5	420.1	5
Beryllium	11.83	<0.5	<0.5	<0.5	5.915	<0.5	<0.5	<0.5	<0.5	<0.5	200.8	0.5	200.8	0.5
Thallium	N/A	<0.5	<0.5	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	<0.5	200.8	0.5	200.8	0.5
Flow, MGD	N/A	3.918	2.772	2.563	2.809	2.809	2.563	2.809	5.235	3.257	N/A	N/A	N/A	N/A
(3)														
Toluene			12											
Bis(2-Ethylhexyl) phthalate		22	20											
Phenol			20											
Aldrin				0.0084										
alpha-Endosulfan				0.24										
beta-BHC				0.060										
Chlorpyrifos				0.070										
4,4'-DDE				0.029										
4,4'-DDT				0.14										
Dieldrin				0.078										
Endosulfan sulfate				0.073										
Endrin				0.026										
Endrin aldehyde				0.026										
gamma-BHC				0.028										
Heptachlor epoxide				0.026										

- (1) 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.
- (2) This value was calculated during the development of TBLL based on State WQ criteria, EPA guidance and ADEQ Pretreatment staff Excel spreadsheets.
- (3) 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.
- MAHL - Maximum Allowable Headworks Level
- WQ - "Water Quality Levels not to exceed" OR actual permit limit.

ATTACHMENT A
PRETREATMENT PROGRAM STATUS REPORT
UPDATED SIGNIFICANT INDUSTRIAL USERS LIST

Industrial User	SIC Code	Categorical Determination	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (C, NC, or SNC)					
			Y/N	Last Action				Reports			Permit Limits		
								90-day Compliance	Semi Annual	Self Monitoring			
Alco 200 West Kingshighway P.O. Box 339 Paragould, AR 72450	622110	Non-Categorical Significant IU (Health Care Facility)	Y	08/01/2011	N	1	4	N/A	N/A	*			C
Garlock Rubber Technologies 201 Dana Drive Paragould, AR 72450	32622 329991 326291 31332	Extruded & Fabricated Rubber	Y	05/01/2011	N	1	13	N/A	N/A	*			C
J. K. Darling 1401 Highway 49B North Paragould, Arkansas 72450	337215	Metal Finishing	Y	02/01/2012	N	1	6	N/A	N/A	*			C
Wittin Sprocket and Gear, Inc. 1405 South Main Avenue Paragould, AR 72450	2899 3099 3599	Metal Finishing & Plastics Molding (No Process Discharge)	Y	07/11/2011	N	1	7	N/A	N/A	*			C
MT-Plotec 2605 North 12 th Avenue P.O. Box 757 Paragould, AR 72450	332811	Not Applicable Declassified as a Metal Finisher	Y	07/01/2011	N	0	15	N/A	N/A	*			C
Wsec Motor Company P.O. Box 320 Kin and Scott Street Paragould, AR 72450	3621	Aluminum Diecasting	Y	09/09/2011	N	1	38	N/A	N/A	*		C	NC
Prattville Wire - LLC and Prestolite Road P.O. Box 1632 Paragould, AR 72450	3357 3471	Metal Finishing (No Process Discharge)	Y	07/11/2011	N	1	4	N/A	N/A	*			C
Medico Automotive 1601 Highway 49B Paragould, AR 72450	3714	Metal Finishing	Y	02/18/2010	N	1	29	N/A	N/A	*			NC

*PLWC does the sampling and monitoring for the IU.
**Arkansas Methodist Medical Center

ATTACHMENT C
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, 2011 February 29, 2012
 (Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 6

Total Number of Significant Noncategorical IUs 1

II. Significant Industrial User Compliance

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of SIUs Submitting BMRs/Total No. Required.	<u>6 / 6</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>0 / 0</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 / 6</u>	<u>0 / 1</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical) . .	<u>0 / 7</u>	

III. Compliance Monitoring Program

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued/Total No. Required.	<u>6 / 6</u>	^{AB} <u>1 / 1</u>
2) No. of Nonsampling Inspections Conducted. .	<u>6 / 6</u>	<u>1 / 1</u>
3) No. of Sampling Visits Conducted.	<u>97</u>	<u>19</u>
4) No. of Facilities Inspected (nonsampling) .	<u>6 / 6</u>	<u>1 / 1</u>
5) No. of Facilities Sampled	<u>6 / 6</u>	<u>2 / 1</u>

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>NonCategorical</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>9</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>

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.

Danell Phillips
Authorized Representative

3-7-2012
Date

PPS Program Report

* NPDES ID: AR0033766

Permittee's Name Paragould

* Report Received/Event Date: 3/9/12

Date 3/13/12

Report Type

Select a Program Report to add

- Biosolids Program Report
- CAFO Annual Report
- CSO Event Report
- Local Limits Report
- MS4 Program Report

- Pretreatment Performance Summary Report *(Allen Gilliam)*
- SSO Annual Report
- SSO Event Report
- SSO Monthly Event Report
- Storm Water Event Report

CONTINUE

Report Information

* Pretreatment Performance Summary Start Date: 3/1/2011

Significant Industrial Users (SIUs)

SIUs: 7

SIUs Without Control Mechanism: 0

SIUs Not Inspected: 0

SIUs Not Sampled: 0

SIUs in SNC with Pretreatment Standards: 0

SIUs in SNC with Reporting Requirements: 0

SIUs in SNC with Pretreatment Schedule: 0

SIUs in SNC Published in Newspaper: 0

SIUs Schedules: 0

Violation Notices Issued to SIUs: 9

Administrative Orders Issued to SIUs: 0

Civil Suits Filed Against SIUs: 0

Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

CIUs: 6

CIUs in SNC: 0

Penalties

Dollar Amount of Penalties Collected: \$ 0

Number of Industrial Users (IUs) from which Penalties have been collected: 0

Other Information

SUO Reference: _____

SUO Date: _____

Annual Pretreatment Budget: \$ _____

Pass-Through/Interference Indicator:

Notification of IU Schedule for Remedial Measures: No

Initial Response to Violation of IU Schedule for Remedial Measures:

Local Limits

Date of Most Recent Technical Evaluation & or Local Limits: _____

Date of Most Recent Adoption of Technically Based Local Limits: _____

Local Limit Pollutants: _____

ADD / REMOVE

Removal Credits

Removal Credits Application Status: Not Applicable

Date of Most Recent Removal Credits Approval: _____

Removal Credits: _____

ADD / REMOVE

Acceptance of Waste

Acceptance of Hazardous Waste: No

Acceptance of Non-Hazardous Industrial Waste: No

Acceptance of Hauled Domestic Wastes: No

Deficiencies

Deficiencies Identified During IJ File Review: No

Control Mechanism Deficiencies: No

Legal Authority Deficiencies: No

Deficiencies in Data Management and Public Participation: No

Deficiencies in Interpretation and Application of Pretreatment Standards: No

Inadequacy of Sampling and Inspections: No

Adequacy of Pretreatment Resources: Yes

Annual Frequency

Annual Frequency of Influent Toxicant Sampling: _____

Annual Frequency of Effluent Toxicant Sampling: _____

Annual Frequency of Sludge Toxicant Sampling: _____