

# Paragould 2020 Pretreatment Program Annual Report

Jain, Anmol

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To: [lellington@paragould.com](mailto:lellington@paragould.com) <[lellington@paragould.com](mailto:lellington@paragould.com)>;

Cc: Healey, Richard <[HEALEYR@adeq.state.ar.us](mailto:HEALEYR@adeq.state.ar.us)>; Ramsey, David <[RAMSEY@adeq.state.ar.us](mailto:RAMSEY@adeq.state.ar.us)>; Allen-Daniel, Leslie <[ALLEN-DANIEL@adeq.state.ar.us](mailto:ALLEN-DANIEL@adeq.state.ar.us)>; McWilliams, Carrie <[mcwilliams2@adeq.state.ar.us](mailto:mcwilliams2@adeq.state.ar.us)>; Brown, Christina <[christina.brown@adeq.state.ar.us](mailto:christina.brown@adeq.state.ar.us)>;

Lisa,

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

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

Sincerely,

**Anmol Jain** | Engineer

**Division of Environmental Quality** | **Office of Water Quality**

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0626 | e: [anmol.jain@adeq.state.ar.us](mailto:anmol.jain@adeq.state.ar.us)

March 22, 2021

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 was one significant violator to the PLWC sewer system from March 1, 2020 to February 28, 2021. 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 2020, 7 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](mailto: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  
SNC Publication

Cc: Ms. Christina Brown

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: March 1, 2020 TO February 28, 2021**  
**TREATMENT PLANT: Paragould Light, Water & Cable; City of Paragould, Arkansas NPDES PERMIT #AR0033766**  
**AVERAGE POTW FLOW: 3.311 MGD % IU FLOW: 10.4 %**

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)
		04/21/20	07/14/20	10/13/20	01/12/21		04/21/20	07/14/20	10/13/20	01/12/21			
Antimony	N/A	<2.08	<2.08	<2.08	<2.00	N/A	<2.08	<2.08	<2.08	<2.00	60	200.8, Rev. 5.4	2.08/2.00
Cadmium	7.94	<0.260	<0.260	<0.260	<0.250	4.0	<0.260	<0.260	<0.260	<0.250	0.5	200.8, Rev. 5.4	0.260/0.250
Copper	226.73	38.0	45.3	39.7	24.9	29.5	5.80	4.15	3.13	6.23	0.5	200.8, Rev. 5.4	0.395/0.380
Lead	30	1.74	2.09	6.71	2.72	11.	<0.260	<0.260	<0.260	0.512	0.5	200.8, Rev. 5.4	0.260/0.250
Mercury	0.27	0.118	0.0217	<0.0005	0.00908	0.01	0.00642	0.00168	0.00112	0.00189	0.005	1631E	0.0005
Nickel	65.4	3.60	3.09	3.60	5.22	322.7	2.02	1.78	2.11	2.41	0.5	200.8, Rev. 5.4	0.260/0.250
Selenium	11.16	<5.20	<5.20	<5.20	<5.00	5.6	<5.20	<5.20	<5.20	<5.00	5	200.8, Rev. 5.4	5.20/5.00
Silver	138.1	<0.312	<0.312	<0.312	<0.300	6.9	<0.312	<0.312	<0.312	<0.300	0.5	200.8, Rev. 5.4	0.312/0.300
Zinc	500	104	119	138	215	281.9	30.7	42.9	33.1	76.0	20	200.8, Rev. 5.4	20.8/20.0
Chromium	239.28	3.66	5.75	7.14	8.52	816.8	0.829	0.470	0.619	0.964	10	200.8, Rev. 5.4	0.260/0.250
Cyanide	18.72	<10	<10	<10	<10	5.8	<10	<10	<10	<10	10	4500-CN B, E - 1999	10
Arsenic	10.9	1.31	1.21	0.819	0.824	390.5	1.11	0.921	1.09	0.783	0.5	200.8, Rev. 5.4	0.260/0.250
Molybdenum	23.26	8.72	10.2	9.64	16.1	N/A	4.50	9.35	10.6	12.8	--	200.8, Rev. 5.4	0.603/0.580
Phenols	N/A	<5	59.8	44.8	12.1	N/A	7.64	<5	<5	14.8	5	420.1-1978	5
Beryllium	11.83	<0.260	<0.260	<0.260	<0.250	5.915	<0.260	<0.260	<0.260	<0.250	0.5	200.8, Rev. 5.4	0.260/0.250
Thallium	N/A	<0.260	<0.260	<0.260	<0.250	N/A	<0.260	<0.260	<0.260	<0.250	0.5	200.8, Rev. 5.4	0.260/0.250
Flow, MGD	N/A	3.218	2.643	2.794	2.654	N/A	3.364	2.983	3.084	3.321			
(3)													
Phenol								34.4					

(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 <sup>th</sup> St. Paragould, AR 72450	333120	40 CFR 433.17	Y	10/01/2019	N	1	11	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 2 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	23	N/A	N/A	C	N/A	C
Tenneco Automotive 1601 Hwy. 49B Paragould, AR 72450	3714	40 CFR 433	Y	12/01/2020	N	1	15	N/A	N/A	C	N/A	C

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

REVISED 03/17/2021

**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*	
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
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	0	4	None	N/A	N/A	C	N/A	C
Nidec Motor Co. Pekin & Scott St. PO Box 520 Paragould, AR 72450	3621	40 CFR 464.15 (b), (c), (h) (No Process Discharge)	Y	04/01/2020	N	1	11	None	N/A	N/A	C	N/A	C
Parker Trutec MMI 2609 North 12 <sup>th</sup> Avenue P.O. Box 757 Paragould, AR 72450	332811	Non-Categorical	Y	07/01/2016	N	0	4	2	N/A	N/A	N/A	N/A	SNC

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.

REVISED 03/17/2021

**ATTACHMENT C**  
**SIGNIFICANT NON-COMPLIANT (SNC) INDUSTRIES - ENFORCEMENT ACTIONS TAKEN**

Industrial User Name	Nature of Violation		Number of Actions Taken					Penalties Collected	Compliance Schedule		Current Status	Comments
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal	Other		Date Issued	Date Due		
Parker Trutec MMI	----	X	2	0	0	0	0	0	0	0	NC	PLWC has increased monitoring of discharge to monthly at a minimum





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>4 / 4</u>	<u>1 / 1</u>
2) No. of Non-sampling Inspections Conducted. .	<u>4</u>	<u>1</u>
3) No. of Sampling Visits Conducted. . . . .	<u>63</u>	<u>4</u>
4) No. of Facilities Inspected (non-sampling) .	<u>4</u>	<u>1</u>
5) No. of Facilities Sampled . . . . .	<u>4</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>2</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. . . . . 4
- 2) No. of Sampling Visits Conducted. . . . . 23
- 3) No. of Facilities Inspected (non-sampling) . . . . . 1
- 4) No. of Facilities Sampled . . . . . 4

VI. Non-Significant Permitted Industrial Enforcement Actions

- 1) No. of Notices of Violations Issued to IUs. . . . . 2
- 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). . . . . 1
- 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."

*Daniel Phyllis*  
Authorized Representative

3/22/2021  
Date

# The Daily Press

## Proof of Publication

STATE OF ARKANSAS  
COUNTY OF GREENE

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I, Matthew Smith solemnly swear that I am classified director of the PARAGOULD DAILY PRESS daily newspaper of general circulation printed in the GREENE County and I was such classified advertising manager at the date of publication hereinafter stated, and that said newspaper had a bonafide circulation in such county at said dates, and had been regularly published in said county for the period of one month next before the date of the first publication of the advertisement hereto affixed, and that said advertisement was published in said

newspaper 1 times once a week for 1

weeks consecutively, the first insertion therein having been made on the

11 day of March, 2021

2nd insertion \_\_\_\_\_ day of \_\_\_\_\_


3rd insertion \_\_\_\_\_ day of \_\_\_\_\_

4th insertion \_\_\_\_\_ day of \_\_\_\_\_

5th insertion \_\_\_\_\_ day of \_\_\_\_\_

6th insertion \_\_\_\_\_ day of \_\_\_\_\_

7th insertion \_\_\_\_\_ day of \_\_\_\_\_

Matthew Smith 

Sworn to and subscribed before me this 11 day of March, 2021

My commission expires 9-6-22

Fee for print, \$ \_\_\_\_\_

Cost of Proof \$ 41.85

Rec'd Payment \$ \_\_\_\_\_

Total - - - \$ 41.85



\* Teresa Rodgers  
PARAGOULD LIGHT, WATER, & CABLE  
PO BOX 9  
PARAGOULD, AR 72450  
(870)239-7700

\* **Class Liner Ad #90910481 Summary:**

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20PR Paragould Daily Press	3/11/21	3/11/21	1

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 2020 through February 2021, one facility was in significant violation of the permitted pollutant limitations: Parker Trutec MMI - Arkansas; 2609 N. 12th Avenue; Paragould, AR 72450.

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 2020 through February 2021, one facility was in significant violation of the permitted pollutant limitations: Parker Trutec MMI - Arkansas; 2609 N. 12th Avenue; Paragould, AR 72450.