

Gage, Hannah

From: Gilliam, Allen
Sent: Wednesday, March 09, 2016 8:50 AM
To: 'Lisa Ellington'
Cc: Gage, Hannah; McWilliams, Clark; Anderson, Alan; Kaelin, Cynthia; Ramsey, David
Subject: AR0033766_Paragould Water Light and Cable March 2016 annual Pretreatment Program report_20160309
Attachments: 2016_PPS_Report_PLWC.PDF; Pretreatment Attachments '14.doc

Lisa,

Paragould Light Water & Cable's March 2016 was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i). No further actions are deemed necessary at this time.

[Note: Attachment B (your attachment C) was revised to help clarify what was being asked for in a mass email to all Pretreatment Cities on 11/20/14 (attached). Please revise your attachment for future use.]

Thank you for your timely report.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Lisa Ellington [<mailto:lellington@paragould.com>]
Sent: Friday, March 04, 2016 1:17 PM
To: Gilliam, Allen
Subject: PPS Report

Allen,

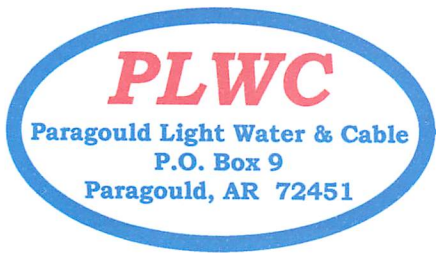
As required by NPDES permit, attached is PLWC's annual report containing a list of industrial dischargers to the collection system, along with the Pretreatment Program Status Report, Pretreatment Performance Summary, and Influent/Effluent monitoring results summary for the monitoring period March 1, 2015 to February 29, 2016. There were no industrial dischargers to the Paragould collection system who significantly violated pretreatment requirements. If you need additional information or would like a hardcopy of this report, please do not hesitate to contact me.

Thank you, and have a great weekend!

Lisa

*Lisa Ellington
Environmental Services Manager
Paragould Light, Water & Cable
P.O. Box 9
Paragould, AR 72450
Phone (870) 239-7795
Fax (870) 239-7791
ellington@paragould.com*





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

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

March 4, 2016

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

Dear Mr. Gilliam:

As required by Page 5 of Part II 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, 2015 to February 29, 2016. 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.

Since 1995, PLWC has honored industrial facilities achieving 100% compliance with both wastewater effluent limitations and reporting requirements during a calendar year. Facilities and their representatives are recognized and presented with a Pretreatment Award during a monthly meeting of the PLWC Board of Commissioners. For the year 2015, 6 out of the 9 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
General Manager/CEO

Enclosures

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

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2015 TO February 29, 2016
TREATMENT PLANT: City of Paragould NPDES PERMIT #AR0033766
AVERAGE POTW FLOW: 3.212 MGD % IU FLOW: 11.3%

METALS, CYANIDE and PHENOLS (Total)	MAHC (µg/l) (2)	INFLUENT DATES SAMPLED (µg/l)				WQ level/ limit (µg/l) (2)	EFFLUENT DATES SAMPLED (µg/l)				LABORATORY ANALYSIS		
		Table III – Once/quarter					Table III – Once/quarter				EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)
		Table II – Once/year					Table II – Once/year						
04/09/15	07/28/15	10/14/15	01/13/16	04/09/15	07/28/15	10/14/15	01/13/16						
Antimony	N/A	<60	<2.08	<2.08	<2.08	N/A	<60	<2.08	<2.08	<2.08	60	200.7	60/2.08
Cadmium	7.94	<0.5	<0.260	<0.260	0.751	4.0	<0.5	<0.260	<0.260	<0.260	0.5	200.8	0.5/0.260
Copper	226.73	28	25.0	20.5	15.9	29.5	8.0	1.88	5.30	4.20	0.5	200.8	0.5/0.260
Lead	30	0.99	0.890	1.23	1.06	11.7	0.60	<0.260	<0.260	0.389	0.5	200.8	0.5/0.260
Mercury	0.27	0.0077	0.011	0.0261	0.0321	0.01	<0.0050	0.00159	0.00556	0.00338	0.005	245.7	0.0018/0.0002
Nickel	65.4	4.0	2.49	4	4	322.7	4.0	2.77	3	3	0.5	200.8	0.5/0.260
Selenium	11.16	<5	<2.08	<2.08	<2.08	5.6	<5	<2.08	<2.08	<2.08	5	200.8	5/2.08
Silver	138.1	<0.5	<0.260	<0.260	<0.260	6.9	<0.5	<0.260	<0.260	<0.260	0.5	200.8	0.5/0.260
Zinc	500	53	64.9	92.6	279	281.9	56	40.6	46.5	51.8	20	200.8	2.0
Chromium	239.28	<10	1.49	2	2	816.8	<10	0.378	0.4	0.7	10	200.8	10/0.3
Cyanide	18.72	<10	<10	<10	<10	5.8	<10	<10	<10	<10	10	335.2	10
Arsenic	10.9	1.8	1.15	0.777	0.758	390.5	1.1	2.04	0.734	1.03	0.5	200.8	0.50.260
Molybdenum	23.36	<8	8.50	0.972	2.06	N/A	<8	4.42	2.10	2.19	----	200.8	8/0.260
Phenolics	N/A	62	39	50	39	N/A	<5	<5	<5	<5	5	420.1	5/
Beryllium	11.83	<0.5	<0.260	<0.260	<0.260	5.915	<0.5	<0.260	<0.260	<0.260	0.5	200.8	0.5/0.260
Thallium	N/A	<0.5	<0.260	<0.260	<0.260	N/A	<0.5	<0.260	<0.260	<0.260	0.5	200.8	0.5/0.260
Flow, MGD	N/A	3.543	2.882	2.642	3.972	N/A	3.407	2.523	2.094	3.461	N/A	N/A	N/A
(3)													
Bis(2-ethylhexyl) Phthalate					14.4						10	625	10

- (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
 SIGNIFICANT INDUSTRIAL USERS LIST**

Industrial User	SIC/NAICS 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*	
Allen Engineering 819 South 5 th Street Paragould, AR 72450	333120	40 CFR 433.17 (Metal Finishing)	Y	10/01/2014	N	1	14	None	N/A	N/A	C	N/A	C
AMMC 900 West Kingshighway P.O. Box 339 Paragould, AR 72450	622110	Non-Categorical (Health Care Facility)	Y	08/01/2011	N	1	4	None	N/A	N/A	N/A	N/A	C
GRT Rubber Technologies 201 Dana Drive Paragould, AR 72450	32622 339991 326291 31332	40 CFR 428, Subpart G (Extruded & Fabricated Rubber)	Y	05/01/2011	N	1	12	1 Daily Limit Oil & Grease	N/A	N/A	C	N/A	NC
L.A. Darling 1401 Highway 49B North Paragould, Arkansas 72450	337215	40 CFR 433.17 (Metal Finishing)	Y	02/01/2012	N	1	38	2 Daily Zinc; 1 Monthly zinc; 2 Daily Limit Oil & Grease	N/A	N/A	C	N/A	NC
Nidec Motor Company Pekin and Scott Street P.O. Box 520 Paragould, AR 72450	3621	40 CFR 464.15 (b), (c), and (h) (Aluminum Diecasting)	Y	02/01/2015	N	1	28	None	N/A	N/A	C	N/A	C
Tenneco Automotive 1601 Highway 49B Paragould, AR 72450	3714	40 CFR Part 433 (Metal Finishing)	Y	02/06/2012	N	1	17	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 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	4	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	07/01/2011	N	0	5	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	07/11/2011	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 VIOLATIONS - ENFORCEMENT ACTIONS TAKEN

Industrial User	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, 2015 February 29, 2016
(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>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 / 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</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>109</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>6</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>14</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."

Danell Phillips
 Authorized Representative

3-4-2016
 Date

(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	

Include NAICS code(s)
 3rd column - include the CFR # only if the Category has Pretreatment Standards (numeric or narrative)
 Please footnote N/A reason

ATTACHMENT C

PRETREATMENT PERFORMANCE SUMMARY (PPS)

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY ADEQ. THE PERMITTEE SHOULD NOT ANSWER THE QUESTIONS BASED ON CHANGES MADE TO THE APPROVED PROGRAM WITHOUT DEPARTMENT AUTHORIZATION.

I. General Information

Control Authority Name _____

Address _____

City _____ State/Zip _____

Contact Person _____ Position _____

Contact Telephone _____ NPDES Permit Nos. _____

Reporting Period _____

(Beginning Month, day and Year) (Ending Month, day and Year)

Total Number of Categorical IUs _____

Total Number of Significant Noncategorical IUs _____

Total Number of Non-Significant (yet permitted) IUs _____

II. Significant Industrial User Compliance

SIGNIFICANT INDUSTRIAL USERS
Categorical NonCategorical

1) No. of SIUs Submitting BMRs/Total No. Required.	/	N/A*
2) No. of SIUs Submitting 90-Day Compliance Reports / No. Required.	/	N/A*
3) No. of SIUs Submitting Semiannual Reports / Total No. Required.	/	/
4) No. of SIUs Meeting Compliance Schedule / Total No. Required to Meet Schedule	/	/
5) No. of SIUs in Significant Noncompliance / Total No. of SIUs	/	/
6) Rate (%) of Significant Noncompliance for all SIUs (categorical and noncategorical) . .	_____	

III. Compliance Monitoring Program

SIGNIFICANT INDUSTRIAL USERS

	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Control Documents Issued / Total No. Required.	/	/
2) No. of Non-sampling Inspections Conducted / Total No. Required.	/	/
3) No. of Sampling Visits Conducted / Total No. Required.	/	/
4) No. of Facilities Inspected (nonsampling) / Total No. Required.	/	/
5) No. of Facilities Sampled / Total No. Required.	/	/

IV. Enforcement Actions

	<u>SIGNIFICANT</u>	<u>INDUSTRIAL USERS</u>
	<u>Categorical</u>	<u>NonCategorical</u>
1) No. of Compliance Schedules Issued/No. of Schedules Required	/	/
2) No. of Notices of Violations Issued to SIUs	_____	_____
3) No. of Administrative Orders Issued to SIUs	_____	_____
4) No. of Civil Suits Filed.	_____	_____
5) No. of Criminal Suits Filed	_____	_____
6) No. of Significant Violators (attach newspaper publication).	_____	_____
7) Amount of Penalties (not surcharges) Collected (total dollars/IUs assessed) . . .	/	/
8) Other Actions (sewer bans, etc.).	_____	_____

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.

Authorized Representative Date _____