



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

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March 2, 2007

Mr. Greg Hurley
Enforcement Assistant
NPDES Enforcement Section
Arkansas Department of
Environmental Quality
P.O. Box 8913
Little Rock, AR 72219-8913

NPDES PERMIT FILE
 NPDES # AR003766
 AFIN # 28-00060
 Permit PN
 Correspondence
 Technical Backup
12-407 NH Date Scanned

*originals "lost" but
 show rec'd 3/6/07
 PCS logged
 IU's v'd
 Inf / EA logged
 AS*

Re: Pretreatment Program Status Report
NPDES Permit No. AR0033766

Dear Mr. Hurley:

As required by Part III, Page 4 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, 2006 to February 28, 2007. 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 2006, we had 4 out of a total 10 industries win this award. Those who received the award were Garlock Rubber Technologies, Prestolite Wire Corporation, L.A. Darling Store Fixtures, and MMI - Trutec.

If you need any additional information, please contact Lisa Ellington, Manager of Environmental Services, at (870) 239-7795.

Sincerely,

Darrell Phillips
 Darrell Phillips
 Chief Operations Officer

Enclosures

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

PRETREATMENT PROGRAM STATUS REPORT
 UPDATED SIGNIFICANT INDUSTRIAL USERS LOG
 ATTACHMENT A

INDUSTRIAL USER	SIC CODE/NAICS NUMBER	CATEGORICAL DETERMINATION	CONTROL DOCUMENT		NEW USER	TIMES INSPECTED	TIMES SAMPLED	COMPLIANCE STATUS				
			Y/N	LAST ACTION				BMR COMPLIANCE	96-DAY COMPLIANCE	SEMI ANNUAL REPORTS	SELF MONITORING	EFFLUENT LIMITS
7-UP & RC BOTTLING COMPANY HIGHWAY 412 WEST PO BOX 839 PARAGOULD, AR 72450	2086	NON-CATEGORICAL	Y	04/17/05	NO	1	24	N/A	N/A	*	C	NC
ARKANSAS METHODIST MEDICAL CENTER 900 WEST KINGSHIGHWAY P.O. BOX 339 PARAGOULD, AR 72450	622110	NON-CATEGORICAL	Y	08/01/06	NO***	1	3	N/A	N/A	*		C
EMERSON ELECTRIC CO. PEKIN AND SCOTT STREET PO BOX 520 PARAGOULD, AR 72450	3621	METAL FINISHING & ALUMINUM DIECASTING	Y	10/01/05	NO	1	51	N/A	N/A	*	C	NC
CARLOCK RUBBER TECHNOLOGIES 201 DANA DRIVE PO BOX 1000 PARAGOULD, AR 72450	32622 339991 326291 31332	EXTRUDED & FABRICATED RUBBER	Y	05/01/01	NO	1	5	N/A	N/A	*		C
L.C. DARLING COMPANY N. HIGHWAY 49B PO BOX 970 PARAGOULD, AR 72450	2542 7218	METAL FINISHING	Y	11/20/01	NO	1	4	N/A	N/A	*		C
MARTIN SPROCKET & GEAR, INC.** 1205 SOUTH THIRD AVENUE PARAGOULD, AR 72450	2899 3089 3569	METAL FINISHING AND PLASTICS MOLDING & FORMING	Y	07/01/00	NO	1	35	N/A	N/A	*		NC

*PLWC does the sampling and monitoring for the IU.

**Martin Sprocket and Gear's permit will be renewed once the local limit for selenium has been determined.

***Arkansas Methodist Medical Center is not a new user - PLWC opted to permit them based on the recommendations of the State Pretreatment Coordinator.

PRETREATMENT PROGRAM STATUS REPORT
 UPDATED SIGNIFICANT INDUSTRIAL USERS LOG
 ATTACHMENT A

INDUSTRIAL USER	SIC CODE	CATEGORICAL DETERMINATION	CONTROL DOCUMENT		NEW USER	TIMES INSPECTED	TIMES SAMPLED	COMPLIANCE STATUS				
			Y/N	LAST ACTION				90-DAY COMPLIANCE	SEMI-ANNUAL REPORTS	SELF MONITORING	EFFLUENT LIMITS	
MOORE, McMILLEN INDUSTRIES, INC. 2609 NORTH 12th AVENUE PO BOX 757 PARAGOULD, AR 72450	332811	METAL FINISHING	Y	10/01/02	NO	1	24	N/A	N/A	*		NC
PRESTOLITE WIRE CORPORATION ONE PRESTOLITE ROAD PO BOX 1632 PARAGOULD, AR 72450	3357 3471	METAL FINISHING DRY CATEGORICAL	Y	04/01/01	NO	1	3	N/A	N/A	*		C
SPECTRUM FINISHING, INC. 1203 E. GOLD SMITH ROAD PO BOX 607 PARAGOULD, AR 72450	3479	METAL FINISHING	Y	11/01/04	NO	1	22	N/A	N/A	*		NC
TENNECO AUTOMOTIVE 1601 HIGHWAY 49-B PO BOX 365 PARAGOULD, AR 72450	3714	METAL FINISHING	Y	12/15/05	NO	1	32	N/A	N/A	*		NC

*PLWC does the sampling and monitoring for the IU.

PRETREATMENT PERFORMANCE SUMMARY (PPS)
ATTACHMENT C

NOTE: ALL QUESTIONS REFER TO THE INDUSTRIAL PRETREATMENT PROGRAM AS APPROVED BY THE EPA. THE PERMITEE 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 1901 Jones Road P.O. Box 9

City Paragould State/Zip Arkansas 72450

Contact Person Lisa Ellington Environmental Services Manager
(Position)

Contact Telephone (870) 239-7795
(Area Code)

NPDES Permit Nos. AR0033766

Reporting Period March 1, 2006 February 28, 2007
(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 8

Total Number of Significant Noncategorical IUs 2

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>8 / 8</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/1 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 / 8</u>	<u>0 / 2</u>
6)	Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>0/10</u>	

III. Compliance Monitoring Program

1)	Of Control Documents Issued/Total No. Required.....	<u>8 / 8</u>	<u>2 / 2</u>
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-2-

2)	No. of Nonsampling Inspections Conducted.....	<u>8</u>	<u>2</u>
3)	No. of Sampling Visits Conducted.....	<u>176</u>	<u>27</u>
4)	No. of Facilities Inspected (nonsampling).....	<u>8/8</u>	<u>2/2</u>
5)	No. of Facilities Sampled.....	<u>8/8</u>	<u>2/2</u>

Iv. Enforcement Actions

SIGNIFICANT INDUSTRIAL USERS

	<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>16</u>	<u>4</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.

David Phillips
Authorized Representative

3-1-2007
Date

MONITORING RESULTS⁽¹⁾ FOR THE ANNUAL PRETREATMENT REPORTREPORTING YEAR: March 1, 2006 to February 28, 2007TREATMENT PLANT: Paragould Light, Water & Cable NPDES PERMIT #: AR0033766AVERAGE POTW FLOW: 2.860 MGD% IU FLOW: 19.34 %

METALS, CYANIDE and PHENOLS	Maximum Allowable Headworks Level (4)	Influent (2) Dates Sampled (mg/l)				WQ Level/ Limit (3) (mg/l)	Effluent (2) Dates Sampled (mg/l)			
		05/03/06	08/08/06	10/03/06	01/30/07		05/03/06	08/08/06	10/03/06	01/30/07
Antimony (Total)		<0.03	<0.03	<0.03	<0.06		<0.03	<0.03	<0.03	<0.06
Arsenic (Total)		<0.001	<0.001	<0.001	<0.01		<0.001	<0.001	<0.001	<0.01
Beryllium (Total)		<0.0003	<0.0003	<0.0003	<0.005		<0.0003	<0.0003	<0.0003	<0.005
Cadmium (Total)		0.00056	0.00018	0.00040	<0.001		<0.0001	<0.0001	<0.0001	<0.001
Chromium (Total)		<0.007	>0.007	<0.007	<0.01		<0.007	<0.007	<0.007	<0.01
Copper (Total)		0.13	0.048	0.15	0.041		0.0079	<0.006	<0.006	<0.01
Lead (Total)		0.0099	0.0036	0.010	<0.005		<0.001	<0.001	<0.001	<0.005
Mercury (Total)		<0.0002	<0.0002	<0.0002	<0.0002		<0.0002	<0.0002	<0.0002	<0.0002
Molybdenum (Total)		0.010	0.011	0.0080	<0.008		<0.008	<0.008	<0.008	<0.008
Nickel (Total)		<0.01	<0.01	0.010	<0.04		<0.01	<0.01	<0.01	<0.04
Selenium (Total)		<0.002	<0.002	<0.002	<0.005		<0.002	<0.002	<0.002	<0.005
Silver (Total)		0.0047	0.0029	0.0043	<0.002		0.00024	<0.0002	<0.0002	<0.002
Thallium (Total)		<0.001	<0.001	<0.001	<0.01		<0.001	<0.001	<0.001	<0.01
Zinc (Total)		0.45	0.080	0.26	0.110		0.063	0.066	0.076	0.042
Cyanide (Total)		<0.01	<0.01	<0.01	<0.02		<0.01	<0.01	0.013	<0.02
Phenols (Total)		0.041	0.071	0.11	0.099		<0.005	0.093	0.0060	0.007
(5)										
Chloroform								0.0033		
Dimethyl phthalate					0.015					
Bis(2-ethylhexyl) phthalate			0.029		0.017			0.025		
Gamma-BHC (Lindane)								0.0000015		
Phenol			0.014		0.012					
Diethyl phthalate			0.0045							

- (1) It is advised that the influent and effluent samples are collected considering flow detention time through each plant. Analytical MQLs should be used so that the data can also be used for Local Limits assessment and NPDES application purpose.
- (2) Indicate reported unit of measurement.
- (3) This value was calculated during development of TBLL and based on State Water Quality Standards and implementation procedures.
- (4) This can be reported in ppm (mg/l), ppb or lb/day.
- (5) Record the name of any pollutants [40 CFR 122, Appendix D, Table II and/or Table V] detected and the quantity in which they were detected.

CODE SHEET

Annual Report

		<u>CODE</u>
Auditor's Name	<u>Gilliam</u>	
Permit Number	<u>AR00 33766</u>	
Period Report Covers End Date	<u>2/28/07</u>	PSED
Start Date	<u>3/1/06</u>	PSSD

PPETS WENDB DATA ELEMENTS

Significant IUs in Significant Noncompliance with Pretreatment Compliance Schedule	<u>0</u>	SSNC
NOV's and A.O.'s Issued Against Significant IUs	<u>20</u>	FENF
Civil and/or Criminal Judicial Actions Against Significant IUs	<u>0</u>	JUDI
Significant IUs with Significant Violations published in Newspaper	<u>0</u>	SVPU
IUs from which penalties have been collected	<u>0</u>	IUPN

COMMENTS:

CODE SHEET

Annual Report

CODE

Auditor's Name _____

Permit Number _____

Period Report Covers End Date _____

PSED

Start Date _____

PSSD

PPETS WENDB DATA ELEMENTS

Significant IUs in Significant Noncompliance
with Pretreatment Compliance Schedule _____

SSNC

NOV's and A.O.'s Issued Against
Significant IUs _____

FENF

Civil and/or Criminal Judicial Actions
Against Significant IUs _____

JUDI

Significant IUs with Significant Violations
published in Newspaper _____

SVPU

IUs from which penalties have been collected _____

IUPN

COMMENTS:
