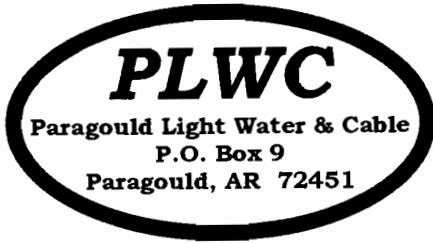


AEJLN Allen



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

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

March 8, 2011

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 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, 2010 to February 28, 2011. 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 2010, all 7 of the permitted industries received this award, which is the first time in the history of the pretreatment award all permitted industries were eligible.

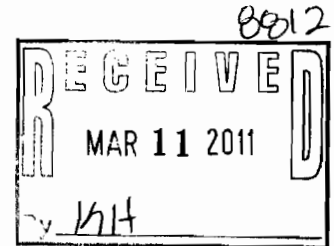
If you need any additional information, please contact Lisa Ellington, Manager of Environmental Services, at (870) 239-7795.

Sincerely,

Darrell Phillips  
Assistant General Manager

Enclosures

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



complete/compliant  
no action necessary  
AF

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: March 1, 2010 TO February 28, 2011**  
**TREATMENT PLANT: City of Pargould NPDES PERMIT #AR0033766**  
**AVERAGE POTW FLOW: 2.864 MGD % IU FLOW: 14.79%**

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			
		04/13/10	07/15/10	10/19/10	01/25/11		04/13/10	07/15/10	10/19/10	01/25/11	EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)	
Antimony	N/A	<60	<60	<60	<60	N/A	<60	<60	<60	<60	<60	60	200.7	60
Cadmium	7.94	<0.5	<0.5	<0.5	<0.5	4.0	<0.5	<0.5	<0.5	<0.5	<0.5	0.5	200.8	5
Copper	226.73	24	87	31	42	29.5	4.9	6.8	7.9	9.1	9.1	0.5	200.8	0.5
Lead	30	1.1	5.8	2.0	1.3	11.7	<0.5	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Mercury	0.27	<0.2	<0.2	—	<0.2	0.01	<0.005	<0.0018	<0.0018	0.0021	0.0021	.005	245.7	0.0018
Nickel	65.4	2.7	5.6	2.6	3.7	322.7	4.5	3.1	2.3	2.3	2.3	0.5	200.8	0.5
Selenium	11.16	<5	<5	<5	<5	5.6	<5	<5	<5	<5	<5	5	200.8	5
Silver	138.1	<0.5	1.0	<0.5	1.0	6.9	<0.5	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Zinc	500	44	130	54	66	281.9	42	52	39	38	38	20	200.8	2.0
Chromium	239.28	<10	<10	<10	<10	816.8	<10	<10	<10	<10	<10	10	200.8	10
Cyanide	18.72	<10	<10	<10	<10	5.8	<10	<10	<10	<10	<10	10	335.2	10
Arsenic	10.9	<0.5	2.0	<0.5	1.0	390.5	<0.5	0.91	<0.5	0.70	0.70	0.5	200.8	0.5
Molybdenum	23.36	<8	8.6	<8	11	N/A	<8	<8	<8	<8	<8	—	200.8	8
Phenols	N/A	97	63	96	82	N/A	<5	5.4	7.1	<5	<5	5	420.1	5
Beryllium	11.83	<0.5	<0.5	<0.5	<0.5	5.915	<0.5	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Thallium	N/A	<0.5	<0.5	0.61	<0.5	N/A	<0.5	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Flow, MGD (3)	N/A	2.927	2.948	2.456	2.485	N/A	2.003	2.917	3.090	2.373	2.373	N/A	N/A	N/A
Toluene			16											
Bis(2-Ethylhexyl) phthalate			16											
Phenol			12											
Chloroform									7.5					

(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 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				BMR	Reports				
									90-day Compliance	Semi Annual	Self Monitoring	Permit Limits	
Kansas Methodist Medical Center 900 West Kingshighway P.O. Box 339 Paragould, AR 72450	622110	Non-Categorical Significant IU (Health Care Facility)	Y	08/01/2006	N	1	4	N/A	N/A	*			C
Garlock Rubber Technologies 201 Dana Drive Paragould, AR 72450	32622 339991 326291 31332	Extruded & Fabricated Rubber	Y	05/01/2006	N	1	12	N/A	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	10/01/2008	N	1	12	N/A	N/A	*			C
NMI-Tsutec 2509 North 12 <sup>th</sup> Avenue P.O. Box 757 Paragould, AR 72450	332811	Metal Finishing	Y	10/01/2007	N	1	23	N/A	N/A	*			C
Widac Motor Company** Pekin and Scott Street P.O. Box 520 Paragould, AR 72450	3621	Metal Finishing & Aluminum Diecasting	Y	10/01/2010	N	1	51	N/A	N/A	*		C	C
Prestolite Wire - LLC One Prestolite Road P.O. Box 1632 Paragould, AR 72450	3357 3471	Metal Finishing (No Process Discharge)	Y	04/01/2006	N	1	5	N/A	N/A	*			C
Tenneco Automotive 1601 Highway 49B Paragould, AR 72450	3714	Metal Finishing	Y	12/15/2010	N	1	22	N/A	N/A	*			C

\*PLWC does the sampling and monitoring for the IU.

\*\*Formerly Emerson Electric Company.



**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, 2010 February 28, 2011

(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>	<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>125</u>	<u>4</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>1 / 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>0</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.

Garrett Phillips  
Authorized Representative

3-8-2011  
Date

# PPS Program Report

\* NPDES ID:

AR0033766

Permittee's Name Paragould

\* Report Received/Event Date:

3/11/11

Date 3/22/11

**Report Information**

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

- Pretreatment Performance Summary Report
- SSO Annual Report
- SSO Event Report
- SSO Monthly Event Report
- Storm Water Event Report

**Report Information**

\* Pretreatment Performance Summary Start Date: 3/1/10

**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: 0
- 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: \$ \_\_\_\_\_  
 Industrial Users (IUs) from which Penalties have been collected: \_\_\_\_\_

**Other Information**

- SUO Reference: \_\_\_\_\_
- SUO Date: \_\_\_\_\_
- Annual Pretreatment Budget: \$ \_\_\_\_\_
- Pass-Through/Interference Indicator:
- Notification of IU Schedule for Remedial Measures:  No
- Local 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: \_\_\_\_\_

**Removal Credits**

Removal Credits Application Status:  Not Applicable  
 Date of Most Recent Removal Credits Approval: \_\_\_\_\_  
 Removal Credits: \_\_\_\_\_

**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 IU 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: \_\_\_\_\_