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

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

*PCS coded
Infl/Eff Logged
SDUs ✓
e-mailed for P/N on Garlock
for being SNC; need P/N
no further action necessary
AFB 4/21/08*

March 14, 2008

Mr. Greg Hurley
Enforcement Assistant
NPDES Enforcement Section
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Pretreatment Program Status Report
NPDES Permit No. AR0033766

AFIN # 28-00060

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 was one significant violator to our sewer system from March 1, 2007 to February 29, 2008; Garlock Rubber Technologies. 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 2007, we had 6 out of a total 10 industries win this award. Those who received the award were Prestolite Wire Corporation, L.A. Darling Store Fixtures, Arkansas Methodist Medical Center, Martin Sprocket and Gear, 7-Up/RC Bottling Company and Tenneco.

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

Sincerely,

Darrell Phillips
Chief Operations Officer

Enclosures

- Pretreatment Program Status Report
- Pretreatment Performance Summary
- Influent and Effluent Monitoring Results Summary
- Proof of Publication for SNC

NPDES PERMIT FILE
 NPDES # AR0033766
 AFIN # 28-00060
 _____ Permit PN
 ✓ Com Report (Pret)
 _____ Technical Backup
 _____ 4/21/08 Date Scanned

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				90-DAY COMPLIANCE	SEMI ANNUAL REPORTS	SELF MONITORING	EFFLUENT LIMITS	
												BMR
7-UP & RC BOTTLING COMPANY HIGHWAY 412 WEST PO BOX 859 PARAGOULD, AR 72450	2086	NON-CATEGORICAL	Y	04/17/05	NO	1	22	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	4	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
GARLOCK RUBBER TECHNOLOGIES 201 DANA DRIVE PO BOX 1000 PARAGOULD, AR 72450	32622 339991 326291 31332	EXTRUDED & FABRICATED RUBBER	Y	05/01/06	NO	1	5	N/A	N/A	*		SNC
LA DARLING COMPANY*** N. HIGHWAY 49B PO BOX 970 PARAGOULD, AR 72450	2542 7218	METAL FINISHING	Y	11/20/01	NO	1	10	N/A	N/A	*		NC
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	34	N/A	N/A	*		C

*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.

***L.A. Darling has recently been decategorized by ADEQ.

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			Y/N	LAST ACTION				BMR COMPLIANCE	REPORTS		EFFLUENT LIMITS	
									90-DAY COMPLIANCE	SEMI ANNUAL		SELF MONITORING
MMI - TRUTECH 2609 NORTH 12th AVENUE PO BOX 757 PARAGOULD, AR 72450	332811	METAL FINISHING	Y	10/01/07	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	04/01/06	NO	1	4	N/A	N/A	*		C
SPECTRUM FINISHING, INC. 1203 E. GOLDSMITH ROAD PO BOX 607 PARAGOULD, AR 72450	3479	METAL FINISHING	Y	11/01/04	NO	1	24	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	26	N/A	N/A	*		C

*PLWC does the sampling and monitoring for the IU.

SIGNIFICANT VIOLATORS - ENFORCEMENT ACTIONS TAKEN
ATTACHMENT B

INDUSTRIAL USER	NATURE OF VIOLATION		NUMBER OF ACTIONS TAKEN				PENALTIES COLLECTED	COMPLIANCE SHCHEDULE		CURRENT STATUS	COMMENTS	
	REPORTS	LIMITS	N.O.V.	A.O.	CIVIL	CRIMINAL		OTHER	DATE ISSUED			DATE DUE
GARLOCK RUBBER TECHNOLOGIES 201 DANA DRIVE PO BOX 1000 PARAGOULD, AR 72450		SNC ON TSS VIOLATIONS	6	0	0	0	0	0	N/A	N/A	NC	WORKING WITH GARLOCK TO PREVENT FURTHER INSTANCES OF NC

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, 2007 February 29, 2008
(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>1 / 8</u>	<u>0 / 2</u>
6)	Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)	<u>1/10</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)	No. of Nonsampling Inspections Conducted.....	<u>8</u>	<u>2</u>
3)	No. of Sampling Visits Conducted.....	<u>178</u>	<u>26</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>26</u>	<u>1</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

3-14-2008

Authorized Representative

Date

PROOF OF PUBLICATION

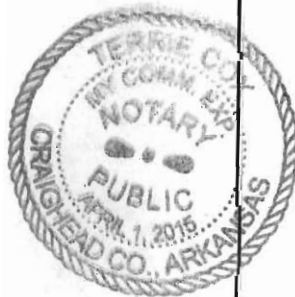
STATE OF ARKANSAS }
COUNTY OF GREENE } I, Sarah Bowden, do
solemnly swear that I am Business Manager of
DAILY PRESS, INC. that publishes the Paragould Daily Press, a daily
newspaper published in Paragould, Greene County, Arkansas; that I was
such Business Manager during the publication
of the attached and that said newspaper has been regularly printed in
said county and had a bona fide circulation therein for one month prior
to the publication of said advertisement, and that same was published in
said paper 1 times; the first insertion being on the 12th day
of March, 2008 and the last insertion being on the
12th day of March, 2008.

Sarah Bowden
Subscribed and sworn to before me the 12 day of
March, 2008.

Terrie Cox, Notary Public

My commission expires April 1, 2015.

Printer's fee	\$	<u>20.70</u>
Affidavit	\$	<u>1.00</u>
Sub Total	\$	_____
Less 5% Discount	\$	_____
Total	\$	<u>21.70</u>



Date March 12, 2008

LEGAL NOTICE

In compliance with 40 CFR 403, The General Pretreatment Regulations, the following customer, having significantly violated pretreatment standards, is submitted by Paragould Light, Water and Cable for publication in a newspaper of general circulation within the municipality: Gartock Rubber Technologies, 201 Dana Drive, Paragould.

CODE SHEET To: D Gerst 4/21/08

Annual Report

		<u>CODE</u>
Auditor's Name	<u>Collins</u>	
Permit Number	<u>AR0033746</u>	
Period Report Covers End Date	<u>2/29/08</u>	PSED
Start Date	<u>3/1/07</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>27</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:

MONITORING RESULTS⁽¹⁾ FOR THE ANNUAL PRETREATMENT REPORT

REPORTING YEAR: March 1, 2007 to February 29, 2008

TREATMENT PLANT: Paragould Light, Water & Cable NPDES PERMIT #: AR0033766

AVERAGE POTW FLOW: 2.699 MGD % IU FLOW: 17.34 %

METALS, CYANIDE and PHENOLS	Maximum Allowable Headworks Level (4)	Influent (2) Dates Sampled (mg/l)				WQ Level/Limit (3)	Effluent (2) Dates Sampled (mg/l)			
		05/01/07	07/31/07	11/27/07	01/22/08		05/01/07	07/31/07	11/27/07	01/22/08
Antimony (Total)	N/A	<0.003	<0.003	<0.003	<0.003	N/A	<0.003	<0.003	<0.003	<0.003
Arsenic (Total)	0.01090	0.0013	<0.001	0.0016	0.0011	0.3905	0.0012	<0.001	0.0018	<0.001
Beryllium (Total)	0.01183	<0.0003	<0.0003	<0.0003	<0.0003	0.005915	<0.0003	<0.0003	<0.0003	<0.0003
Cadmium (Total)	0.00794	<0.0001	0.00021	0.00027	0.00046	0.0040	<0.0001	<0.0001	0.00010	<0.0001
Chromium (Total)	0.23928	<0.007	<0.007	<0.007	<0.007	0.8168	<0.007	<0.007	<0.007	<0.007
Copper (Total)	0.22673	0.050	0.089	0.081	0.17	0.0295	0.0095	0.0042	0.0076	0.016
Lead (Total)	0.03000	0.0024	0.0037	0.0028	0.0051	0.0117	0.0026	<0.001	0.0010	<0.001
Mercury (Total)	0.00027	<0.0002	<0.0002	<0.0002	<0.0002	0.00001	<0.0002	<0.0002	<0.0002	0.0000032
Molybdenum (Total)	0.02336	0.0081	0.013	<0.008	0.026	—	<0.008	<0.008	<0.008	<0.008
Nickel (Total)	0.06540	<0.01	<0.01	<0.01	<0.01	0.3227	<0.01	<0.01	<0.01	<0.01
Selenium (Total)	0.01116	<0.002	<0.002	<0.002	<0.002	0.0056	<0.002	<0.002	<0.002	<0.002
Silver (Total)	0.13810	0.0014	0.0040	0.00087	0.0033	0.0069	<0.0002	<0.0002	<0.0002	0.00034
Thallium (Total)	N/A	<0.001	<0.001	<0.001	<0.001	N/A	<0.001	<0.001	<0.001	<0.001
Zinc (Total)	0.50000	0.11	0.14	0.13	0.22	0.2819	0.11	0.075	0.058	0.046
Cyanide (Total)	0.01872	<0.01	<0.01	<0.01	<0.01	0.0058	0.015	<0.010	0.013	<0.01
Phenols (Total)	N/A	0.095	0.079	0.029	0.055	N/A	0.082	0.012	<0.005	<0.005
(5)										
Chloroform										
Dimethyl phthalate										
Bis(2-ethylhexyl) phthalate		0.026	0.042				0.014	0.008	0.0043	0.0034
Gamma-BHC (Lindane)							0.000019			
Phenol		0.025			0.016		0.0025			
Diethyl phthalate										
Toluene			0.012				0.0098			

- (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.