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February 4, 2010

Mr. Greg Hurley
Enforcement Assistant
NPDES Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: NPDES Permit AR0033766

Dear Mr. Hurley:

As required by Part II of the above referenced permit, Paragould Light, Water and Cable (PLWC) has performed a technical evaluation demonstrating that the existing technically based maximum headworks loadings (MAHL) are based on current state water quality standards.

Based on current MAHLs, a local limit of 0.22 lbs/day for Selenium is necessary to protect current water quality standards. This limit was implemented by PLWC through resolution on May 19, 2008. No other local limit is necessary at this time. All information was sent to Mr. Allen Gilliam, and he has approved all MAHLs for PLWC.

Therefore, we certify that the existing MAHLs in the Pretreatment Program are based on current water quality standards and are adequate to prevent pass through of pollutants, inhibition of or interference with the treatment facility, and sludge contamination.

If you have questions or need additional information, please contact Lisa Ellington at (870) 239-7795. Thank you.

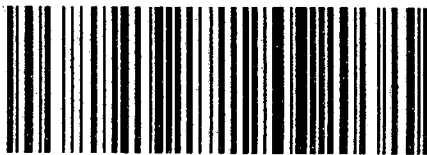
Sincerely,

Darrell Phillips
Assistant General Manager

Cc: Mr. Allen Gilliam

Paragould Light Water & Cable
P.O. Box 9
Paragould, AR 72451

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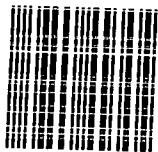
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Mr. Allen Gilliam
State Pretreatment Coordinator
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317