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March 3, 2009

60713

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

MAR - 4 2009
Adequate, no comments necessary.
AH
MH

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 violator to our sewer system from March 1, 2008 to February 28, 2009. 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 2008, we had 5 out of a total 9 industries win this award. Those who received the award were Prestolite Wire Corporation, Arkansas Methodist Medical Center, Martin Sprocket and Gear, Spectrum Finishing, Inc. and Tenneco.

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

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				Reports				
								BMR	90-day Compliance	Semi Annual	Self Monitoring	Permit Limits
7-Up & RC Bottling Company** Highway 412 West P.O. Box 859 Paragould, AR 72450	2086	Non-Categorical (Production of Soft Drinks)	Y	04/17/2005	N	1	16	N/A	N/A	*	C	NC
Arkansas Methodist Medical Center 900 West Kingshighway P.O. Box 339 Paragould, AR 72450	622110	Non-Categorical (Health Care Facility)	Y	08/01/2006	N	1	4	N/A	N/A	*		C
Emerson Electric Company Pekin and Scott Street P.O. Box 520 Paragould, AR 72450	3621	Metal Finishing & Aluminum Diecasting	Y	10/01/2005	N	1	30	N/A	N/A	*	C	NC
Garlock Rubber Technologies 201 Dana Drive Paragould, AR 72450	32622 339991 326291 31332	Extruded & Fabricated Rubber	Y	05/01/2006	N	1	24	N/A	N/A	*		NC
Martin Sprocket and Gear, Inc. 1205 South Third Avenue Paragould, AR 72450	2899 3089 3569	Metal Finishing & Plastics Molding and Forming	Y	10/01/2008	N	1	24	N/A	N/A	*		C
MMI-Trutec 2609 North 12 th Avenue P.O. Box 757 Paragould, AR 72450	332811	Metal Finishing	Y	10/01/2007	N	1	24	N/A	N/A	*		NC
Prestolite Wire Corporation One Prestolite Road P.O. Box 1632 Paragould, AR 72450	3357 3471	Metal Finishing (Dry Categorical)	Y	04/01/2006	N	1	4	N/A	N/A	*		C
Spectrum Finishing, Inc.*** 1203 East Goldsmith Road P.O. Box 607 Paragould, AR 72450	3479	Metal Finishing	Y	11/01/2004	N	1	22	N/A	N/A	*		C
Tenneco Automotive 1601 Highway 49B Paragould, AR 72450	3714	Metal Finishing	Y	12/15/2005	N	1	25	N/A	N/A	*		C

**7-Up & RC Bottling Company stopped production in October 2008.

***Spectrum Finishing, Inc. stopped production in January 2009.

*PLWC does the sampling and monitoring for the IU.

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, 2008 February 28, 2009

(Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 7

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>7 / 7</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 / 7</u>	<u>0 / 2</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and noncategorical)		<u>0 / 9</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>7 / 7</u>	<u>2 / 2</u>
2) No. of Nonsampling Inspections Conducted. .	<u>7 / 7</u>	<u>2 / 2</u>
3) No. of Sampling Visits Conducted.	<u>153</u>	<u>20</u>
4) No. of Facilities Inspected (nonsampling) .	<u>7 / 7</u>	<u>2 / 2</u>
5) No. of Facilities Sampled	<u>7 / 7</u>	<u>2 / 2</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>10</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.

David Phillips
 Authorized Representative

3-3-2009
 Date

MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT
REPORTING YEAR: March 1, 2008 TO February 28, 2009
TREATMENT PLANT: City of Paragould NPDES PERMIT #AR0033766
AVERAGE POTW FLOW: 3.074 MGD % IU FLOW: 13.21%

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			
		04/24/08	07/29/08	10/14/08	01/20/09		04/24/08	07/29/08	10/14/08	01/20/09	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	0.58	<0.5	4.0	<0.5	<0.5	<0.5	<0.5	<0.5	0.5	200.8	5
Copper	226.73	29	40	27	45	29.5	4.7	7.3	5.5	7.4	7.4	0.5	200.8	0.5
Lead	30	2.8	1.8	1.4	2.1	11.7	0.57	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Mercury	0.27	<0.2	0.41	<0.2	0.0072	0.01	0.0023	0.0018	<0.0018	0.0042	0.0042	.005	245.7	0.0018
Nickel	65.4	3.0	7.4	9.1	4.9	322.7	4.3	3.1	2.9	4.2	4.2	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	0.84	0.52	<0.5	1.0	6.9	<0.5	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Zinc	500	55	110	59	120	281.9	62	57	44	39	39	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	<0.5	1.3	<0.5	390.5	<0.5	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Molybdenum	23.36	<8	<8	9.1	<8	N/A	<8	<8	<8	<8	<8	—	200.8	8
Phenols	N/A	89	64	86	15	N/A	<5	<5	<5	<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	0.83	<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	2.979	2.598	2.601	3.316	N/A	3.265	2.524	2.640	3.102	3.102	N/A	N/A	N/A
Chloroform	N/A	—	1.7	—	1.9	N/A	2.0	5.9	2.7	—	—	10	624	1.6
Bis(2-ethylhexyl) phthalate	N/A	44	38	13	15	N/A	12	—	11	7.7	7.7	10	625	2.5
Di-N-butyl phthalate	N/A	—	—	—	—	N/A	—	2.6	—	—	—	10	625	2.5
Phenol	N/A	—	—	—	10	N/A	—	—	—	—	—	10	625	1.5
Toluene	N/A	—	31	—	—	N/A	—	—	—	—	—	10	624	6

(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.

PPS Program Report

* NPDES ID: AR0033746 Permittee's Name Paragon Ltd
 * Report Received/Event Date: 3/1/09 Date 3/30/09

Report Type

Select a Program Report to add:

- 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: 3/1/08

Significant Industrial Users (SIUs)

SIUs: 9

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: 10

Administrative Orders Issued to SIUs: 0

Civil Suits Filed Against SIUs: 0

Criminal Suits Filed Against SIUs: 0

Categorical Industrial Users (CIUs)

CIUs: 7

CIUs in SNC: 0

Penalties

Dollar Amount of Penalties Collected: \$ 0

Industrial Users (IUs) from which Penalties have been collected: 0

Other Information

SUO Reference: _____

SUO Date: _____

Annual Pretreatment Budget: \$ _____

Pass-Through/Interference Indicator:

Adoption of IU Schedule for Remedial Measures: No

Timely 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: _____