

## Wilson, Tabatha

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**From:** Gilliam, Allen  
**Sent:** Monday, March 17, 2014 3:29 PM  
**To:** Lisa Ellington  
**Cc:** Fuller, Kim; Wilson, Tabatha; Kaelin, Cynthia; Ramsey, David; Uyeda, Craig; Anderson, Alan  
**Subject:** AR0033766\_Paragoulds March 2014 annual Pretreatment Report with ADEQ reply\_20140317  
**Attachments:** Pretreatment\_Program\_Status\_Report.pdf

Lisa,

Paragould's March 2014 annual Pretreatment Report has been received and reviewed, however it is not compliant.

Paragould's NPDES permit, Page 5 of Part II, Section 7.c. requires the permittee [to] analyze the treatment facility influent and effluent for the presence of the toxic pollutants listed in 40 CFR 122 Appendix D,...in Table III at least 4 times/year (quarterly or once/3 months)."

Page 7 of Part II of Paragould's NPDES permit also requires, "(5) [report] The results of all influent and effluent analyses performed pursuant to paragraph (c) above;"

It was noted the treatment facility's influent mercury was not analyzed nor reported for the first two quarters of PLWC's "Pretreatment year" on the attached report.

Please respond in writing within thirty (30) days from the date on this correspondence how this oversight will be corrected in the future.

Thank you for your timely report and response.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

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**From:** Lisa Ellington [<mailto:lellington@paragould.com>]  
**Sent:** Wednesday, March 12, 2014 7:12 AM  
**To:** Gilliam, Allen  
**Subject:** Annual PPS Report

Allen,

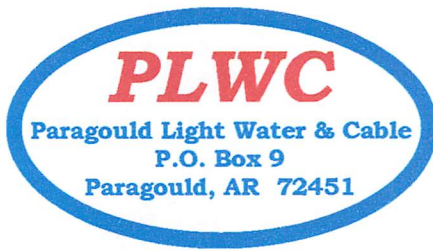
Good morning! I hope all is well with you.

Attached is the Paragould Light, Water & Cable annual PPS report for the reporting period of March 1, 2013 to February 28, 2014. The original can be mailed to you, so let me know if the report should be mailed to you. If you have questions or need additional information, please do not hesitate to contact me.

Thanks and have a great week!

Lisa

*Lisa Ellington  
Environmental Services Manager  
Paragould Light, Water & Cable  
P.O. Box 9  
Paragould, AR 72450  
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*"One Team, One Goal...Customer Service"*

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March 10, 2014

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 Page 5 of Part II 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, 2013 to February 28, 2014. 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 2013, 5 out of the 7 permitted industries were eligible to receive this award.

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

Sincerely,

Darrell Phillips  
General Manager/CEO

Enclosures

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

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: March 1, 2013 TO February 28, 2014**  
**TREATMENT PLANT: City of Paragould NPDES PERMIT #AR0033766**  
**AVERAGE POTW FLOW: 3.006 MGD % IU FLOW: 11.94%**

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		
		04/23/13	07/09/13	10/01/13	01/21/14		04/23/13	07/09/13	10/01/13	01/21/14	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
Cadmium	7.94	<0.5	<0.5	<0.5	<0.5	4.0	<0.5	1.8	<0.5	<0.5	0.5	200.8	5
Copper	226.73	27	61	34	27	29.5	5.3	7.5	3.7	5.5	0.5	200.8	0.5
Lead	30	1.3	2.4	1.0	0.92	11.7	<0.5	2.2	<0.5	<0.5	0.5	200.8	0.5
Mercury	0.27			<0.2	0.013	0.01	0.0051	0.0022	<0.0018	<0.0018	0.005	245.7	0.0018
Nickel	65.4	7.0	5.5	3.0	3.3	322.7	2.5	0.60	2.3	3.5	0.5	200.8	0.5
Selenium	11.16	<5	<5	<5	<5	5.6	<5	<5	<5	<5	5	200.8	5
Silver	138.1	<0.5	<0.5	<0.5	<0.5	6.9	<0.5	<0.5	<0.5	<0.5	0.5	200.8	0.5
Zinc	500	59	140	63	75	281.9	44	50	35	56	20	200.8	2.0
Chromium	239.28	<10	<10	<10	<10	816.8	<10	<10	<10	<10	10	200.8	10
Cyanide	18.72	<10	<10	<10	<10	5.8	<10	<10	<10	<10	10	335.2	10
Arsenic	10.9	0.88	1.2	0.82	0.77	390.5	0.99	2.0	0.65	0.64	0.5	200.8	0.5
Molybdenum	23.36	<8	<8	<8	<8	N/A	<8	<8	<8	<8	----	200.8	8
Phenols	N/A	66	63	120	67	N/A	5.8	17	14	7	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	200.8	0.5
Thallium	N/A	<0.5	<0.5	<0.5	<0.5	N/A	<0.5	1.4	<0.5	<0.5	0.5	200.8	0.5
Flow, MGD (3)	N/A	2.941	2.571	2.625	2.858	N/A	3.982	2.631	2.386	2.694	N/A	N/A	N/A
Bis(2-ethylhexyl)phthalate					14					12			
Phenol					19								

- (1) It is advised that the influent and effluent samples are collected considering flow detention time through plant. Analytical MQLs must be met for the effluent (and SHOULD be met for the influent) so the 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**  
**SIGNIFICANT INDUSTRIAL USERS LIST**

Industrial User	SIC Code	Categorical Determination	Control Document		New User	Times Inspected	Times Sampled	Permit Limit Violations	Compliance Status (C, NC, or SNC)				
			Y/N	Last Action					Reports				Permit Limits
									BMR	90-day Compliance	Semi Annual	Self Monitoring	
AMMC 900 West Kingshighway P.O. Box 339 Paragould, AR 72450	622110	Non-Categorical (Health Care Facility)	Y	08/01/2011	N	1	3	N/A	N/A	N/A	*		C
Garlock Rubber Technologies 201 Dana Drive Paragould, AR 72450	32622 339991 326291 31332	Extruded & Fabricated Rubber	Y	05/01/2011	N	1	12	N/A	N/A	N/A	*		C
L.A. Darling 1401 Highway 49B North Paragould, Arkansas 72450	337215	Metal Finishing	Y	02/01/2012	N	1	27	N/A	N/A	N/A	*		C
Nidec Motor Company Pekin and Scott Street P.O. Box 520 Paragould, AR 72450	3621	Aluminum Diecasting	Y	05/01/2012	N	1	27	1 Daily Limit Zinc; 6 Monthly Limit Zinc	N/A	N/A	*	C	NC
Tenneco Automotive 1601 Highway 49B Paragould, AR 72450	3714	Metal Finishing	Y	02/06/2012	N	1	15	1 Daily Limit Trichloroethylene	N/A	N/A	*		NC

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

**ATTACHMENT B**  
**PRETREATMENT PROGRAM STATUS REPORT**  
**NON-SIGNIFICANT PERMITTED INDUSTRIAL USERS LIST**

Industrial User	SIC Code	Categorical Determination	Control Document		New User	Times Inspected	Times Sampled	Permit Limit Violations	Compliance Status (C, NC, or SNC)				
			Y/N	Last Action					Reports				Permit Limits
									BMR	90-day Compliance	Semi Annual	Self Monitoring	
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	05/24/2013	N	0	5	N/A	N/A	N/A	*		C
Parker Trutec MMI 2609 North 12 <sup>th</sup> Avenue P.O. Box 757 Paragould, AR 72450	332811	Non-Categorical	Y	07/01/2011	N	0	4	N/A	N/A	N/A	*		C
Prestolite Wire - LLC One Prestolite Road P.O. Box 1632 Paragould, AR 72450	3357 3471	Metal Finishing (No Process Discharge)	Y	07/11/2011	N	0	3	N/A	N/A	N/A	*		C

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



**ATTACHMENT D  
 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, 2013 February 28, 2014  
 (Beginning Month and Year) (Ending Month and Year)

Total Number of Categorical IUs 4

Total Number of Significant Non-Categorical IUs 1

Total Number of Non-Significant Permitted IUs 3

Total Number of SSOs due to grease blockages 0

II. Significant Industrial User Compliance

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>Non-Categorical</u>
1) No. of SIUs Submitting BMRs/Total No. Required. . . . .	<u>0 / 0</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 / 4</u>	<u>0 / 1</u>
6) Rate of Significant Noncompliance for all SIUs (categorical and non-categorical) . . . . .	<u>0 / 4</u>	<u>0 / 1</u>



III. Compliance Monitoring Program

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>Non Categorical</u>
1) No. of Control Documents Issued/Total No. Required. . . . .	<u>4 / 4</u>	<u>1 / 1</u>
2) No. of Non-sampling Inspections Conducted. .	<u>4</u>	<u>1</u>
3) No. of Sampling Visits Conducted. . . . .	<u>81</u>	<u>3</u>
4) No. of Facilities Inspected (non-sampling) .	<u>4</u>	<u>1</u>
5) No. of Facilities Sampled . . . . .	<u>4</u>	<u>1</u>

IV. Enforcement Actions

	<u>SIGNIFICANT INDUSTRIAL USERS</u>	
	<u>Categorical</u>	<u>Non-Categorical</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>8</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>

V. Non-Significant Permitted Industrial User Compliance

1) No. of Permits Issued. . . . .	<u>3</u>
2) No. of Sampling Visits Conducted. . . . .	<u>12</u>
3) No. of Facilities Inspected (non-sampling) . . . . .	<u>0</u>
4) No. of Facilities Sampled . . . . .	<u>3</u>

VI. Non-Significant Permitted Industrial Enforcement Actions

1) No. of Notices of Violations Issued to IUs. . . . .	<u>0</u>
2) No. of Administrative Orders Issued to IUs. . . . .	<u>0</u>
3) No. of Civil Suits Filed. . . . .	<u>0</u>
4) No. of Criminal Suits Filed . . . . .	<u>0</u>
5) No. of Significant Violators (attach newspaper publication). . . . .	<u>0</u>
6) Amount of Penalties Collected (total dollars/IUs assessed) . . . . .	<u>0 / 0</u>
7) Other Actions (sewer bans, etc.). . . . .	<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."

Daniel Buckley  
Authorized Representative

3-10-2014  
Date