

Wilson, Tabatha

From: Gilliam, Allen
Sent: Wednesday, March 19, 2014 10:29 AM
To: Lisa Ellington
Cc: Fuller, Kim; Wilson, Tabatha; Uyeda, Craig; Anderson, Alan
Subject: AR0033766_Paragoulds March 2014 incomplete annual Pretreatment Report w PLWCs response_20140319
Attachments: 2014_PPS_Noncompliance_Response.pdf

Thank you for your response Lisa,

Your response (attached) is adequate to address the non-sampling/non-reporting for your influent mercury submitted with PLWC's annual Pretreatment report.

Thank you for your timely reply.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Lisa Ellington [<mailto:lellington@paragould.com>]
Sent: Wednesday, March 19, 2014 10:14 AM
To: Gilliam, Allen
Subject: RE: AR0033766_Paragoulds March 2014 annual Pretreatment Report with ADEQ reply_20140317

Allen,

Please find attached a letter responding to your written request below. If you need additional information do not hesitate to contact me. Thank you.

*Lisa Ellington
Environmental Services Manager
Paragould Light, Water & Cable
P.O. Box 9
Paragould, AR 72450
Phone (870) 239-7795
Fax (870) 239-7791
lellington@paragould.com*

From: Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]
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

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



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

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

March 19, 2014

Mr. Allen Gilliam
State Pretreatment Coordinator
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Pretreatment Program Status Report – Noncompliance Response
NPDES Permit No. AR0033766

Dear Mr. Gilliam:

As requested by your email dated March 17, 2014, Paragould Light, Water & Cable (PLWC) is responding to the noncompliance with the 2014 Pretreatment Program Status Report (PPS).

According to NPDES Permit AR0033766, PLWC is required to analyze the wastewater treatment plant influent for pollutants listed in 40 CFR 122 Appendix D at least four times per year and report results in PLWC's annual PPS. During the first two quarters of 2013, influent at PLWC was not tested for mercury as required by regulation. Investigation into this situation has shown the error to be due to several factors.

First, analytical reports received from American Interplex Corporation (AIC) were not reviewed upon receipt to determine if all results were quantified for required pollutants. Second, AIC noted on the April 2013 sample that influent mercury was not to be tested even though the chain of custody specified testing for low level mercury. According to AIC, this was based on a conversation between Shauna and me on April 26, 2013. Third, ADEQ suggested low level mercury be analyzed on influent at PLWC, which caused some confusion for PLWC personnel.

In the future, all analytical reports will be reviewed upon receipt to confirm required parameters have been analyzed according to regulation. Furthermore, AIC has noted in the PLWC file to test low level mercury for all submitted PPS influent metal samples. This was requested by me during a conversation with John Overbey on March 18, 2014 at approximately 8:45 A.M. Also, lab personnel will be trained on properly completing chains of custody and understanding requirements of the PLWC NPDES Permit.

If you have questions or need any additional information, please contact me at (870) 239-7795 or lellington@paragould.com. Thank you.

Sincerely,

Lisa Ellington
Environmental Services Manager