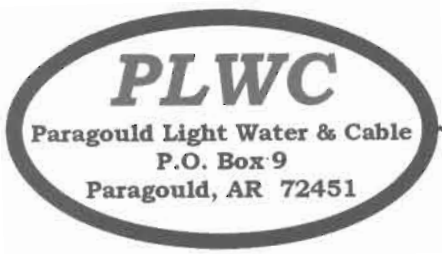


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June 23, 2011

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



Re: Paragould Light Water and Cable NPDES #AR0033766
Corrective Action Report on Pretreatment Program Audit/Assessment

Dear Mr. Gilliam:

Please find enclosed the Corrective Action Report for Paragould Light, Water and Cable based on the audit/assessment you conducted on our Pretreatment Program in December 2010.

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

Sincerely,
Darrell Phillips
Darrell Phillips
Assistant General Manager

Enclosure

Corrective Action Report

Pretreatment Program Audit
and
Pollution Prevention Assessment

NPDES Permit #AR0033766

Submitted by:
Lisa Ellington
Manager of Environmental Services
Paragould Light, Water and Cable
June 23, 2011

Required Actions

1) Under 40 CFR 403.8(f)(1)(B)

“Both individual and general control mechanisms must be enforceable and contain, at a minimum, the following conditions:...(3) Effluent limits, including Best Management Practices, based on applicable general Pretreatment Standards in part 403 of this chapter, categorical Pretreatment Standard, local limits, and State and local law;...”

- a) After a thorough review of Nidec’s (previously Emerson Electric) processes, site visit observations, post audit chemical MSDS reviews and correspondence with the chemical manufacturer’s representatives, it was determined no core operations existed under the Metal Finishing Standards in 40 CFR 433. Only aluminum die casting operations under 40 CFR 464.15 were present.

The City must revise Nidec’s permit to reflect the correct production based permit limits under the appropriate subprocesses in 40 CFR 464.15.

- b) After the site visit at MMI-Trutec and post audit review of their chemicals’ MSDS, this auditor could not find any evidence they had any core operations under the Metal Finishing Standards in 40 CFR 433. This auditor could not locate records an audit site visit had ever been conducted at MMI.

The City must remove any citations to Metal Finishing under 40 CFR 433 and revise MMI’s permit to reflect appropriate limits (or “report only”) for metals of concern seen in this facility’s wastestream. The City may still limit their “subsequently produced” CN per the 40 CFR 433 standards referring to them as “technology transfer” limits since they have historically been conducting CN destruct methods to meet the CFR 433 limits in the past.

Corrective Action:

Nidec Motor Corporation’s permit has been revised to reflect the correct Aluminum Die Casting production based limits under the proper subprocesses of 40 CFR 464.15. The corrected permit will become effective July 1, 2011.

The permit for MMI-Trutec has been revised to remove any reference of Metal Finishing Categorical Standards in 40 CFR 433. The modified permit will become effective July 1, 2011.

Recommendations

1) Recommend

Recommend issuing Martin Sprocket and Prestolite Wire “No Discharge” permits specifying “There will be no regulated metal finishing wastewater discharged to the City’s Sewage system. Records (manifests or other supporting documentation) will be kept on-site for further verification” or words to that effect. A certification statement stating the same should be required twice/year. These two non-discharging categoricals can then be placed on a separate (Annual Report) list entitled “Non-Significant, yet permitted IUs”, thereby negating the required yearly inspections and sampling requirements by the City per 40 CFR 403.8(f)(2)(v). As deemed necessary, periodic inspections (informal) and possible unannounced sampling can still be accomplished.

Response:

Research is being conducted to determine the best approach to write revised permits for Martin Sprocket and Prestolite. Once the research is complete, “No Discharge” permits will be issued to these IUs.

2) Recommend

Strongly recommend cross training another employee in all aspects of the day-to-day administrative, implementation and enforcement procedures of the City’s Pretreatment Program. Drafting standard operating procedures (SOPs) for the day-to-day administrative duties of the City’s Pretreatment Coordinator should be a priority. SOPs could include more details on how simple industry surveys are conducted from a draft of example cover letter, to potential source(s) of businesses to the actual survey template. Other SOPs could include sampling protocols for each industry sampled, IU inspections, how daily industry correspondence is handled/filed, etc.

Response:

Plans at PLWC are to appoint an Assistant Pretreatment Coordinator within the next year. With the recent changes in the Environmental Services department, additional time is needed to evaluate current staff to determine who is best suited for the position. In the meantime, efforts will be made to write SOPs which will be used to facilitate the training of employee(s) in the PLWC Pretreatment Program.

3) Recommend

PLWC personnel have an excellent start on their IU’s facts sheets. Continue (every permit cycle?) sending these fact sheets to the IU’s representatives to update, sign and date with any changes in processes or chemicals. Updated, detailed description of processes should be included as well as accurate manufacturing/process schematics should be required.

Non-regulated wastewater flows could also be included on these schematics. Other information in the fact sheets’ schematics could include “flow” of raw material as it travels through the various processes to the end product out the back door, materials’ (especially haz waste)

handling practices (totes, carboys, forklift, buckets, etc.), how chemicals are handled from point A to point B, and especially the sampling point(s) should be included. Actual pictures of the sampling point(s) is advisable.

Response:

Fact sheet forms have been updated as recommended requesting IUs to include all sources of wastewater from their facility; accurate schematics of all processes; flow of material as it travels through the various processes to the end product; changes to chemicals, processes and schematics since the last update; how all materials are handled at each facility (raw products, chemicals, hazardous wastes, etc.); and chemical handling procedures within each facility from delivery to usage area. Pictures of sampling areas are included in inspection forms, and will also be included in fact sheets.

4) Recommend

Inspection reports which reference these fact sheets where more information includes a detailed physical description of the IU's manufacturing processes is critical in understanding each significant industries' wastewater generating operations.

Once a comprehensive inspection is on file electronically for each IU, for the next annual inspection, this auditor would recommend City personnel use the previous year's completed inspection and "red ink" necessary updates or IU changes on that form instead of re-writing a new one each year that basically says the same thing. Obviously, new signatures with the inspection date would be necessary.

Response:

Inspection report forms will be expanded to include detailed information gathered during inspections and from fact sheets. PLWC has for the past several years used the previous year's completed inspection report when visiting facilities and "red ink" updates.

5) Recommend

Recommend recycling old, out-dated permits, duplicates and other needless documents older than three (3) years.

During the audit, documentation was for the most part, easily retrieved, but with some information scattered/duplicated. It seemed to this auditor better order could be achieved. Retain permitted industries' pertinent information such their most recent permit applications, updated TOMP's and Slug Control Plans. Recommend retaining any original baseline monitoring reports and 90-day compliance reports if they're still "findable". Those should not be recycled after three (3) years.

Response:

All IU files will be reworked to recycle documents older than three (3) years and duplicated documents. Pertinent information (most recent permit application, TOMP, Slug Control Plan,

etc.) and original baseline monitoring reports and 90-day compliance reports (if located) will be retained in industrial files.

6) Recommend

Recommend asking each permitted IU to submit in chronological order their pollution prevention/best management practices success stories. Periodic updates to their P2/BMP efforts should be requested in their permits illustrating what they've reduced/saved such as energy/water, raw material cost savings, source reduction, inventory control (lean manufacturing), product substitution, etc.

Several instances of IU's P2 efforts were observed during the site visit but, no reports were being gathered nor asked for by PLWC. These IUs should be recognized for going above and beyond the basic regulatory minimum. That can be accomplished via both the national and regional P2 programs and databases.

Response:

PLWC agrees that recognition should be given to IUs who have gone above and beyond the basic regulatory minimum, and has in previous years asked IUs to provide information regarding P2/BMP efforts, but no response was ever received from any of the IU representatives. A letter will be drafted requesting information on P2/BMP activities in order to give IUs the recognition they so richly deserve.

7) Recommend

Continue sending business sector surveys tailored to "fit" their operations/activities. It may be prudent at this time to begin compiling a list of dental facilities in your service area considering EPA is currently drafting a new pretreatment guideline (category) for them. The Proposed Rule is scheduled for federal register notice in October of this year.

Response:

Waste questionnaire surveys will be sent out to area businesses on a regular basis. These surveys will be curtailed according to business sector. In addition, PLWC will begin compiling a list of dental offices in Paragould to prepare for the establishment of dental pretreatment guidelines being proposed later this year.