



ARKANSAS
Department of Environmental Quality

June 24, 2011

Darrell Phillips, Assistant General Manager
Paragould Light, Water, and Cable
P.O. Box 9
Paragould, AR 72450

RE: Paragould Light, Water, and Cable -WWTP and Collection system

AFIN: 28-00470 NPDES Permit No.: AR0033766

Dear Mr. Phillips:

On May 18-19, 2011, Brent Walker and I performed routine compliance, stormwater, and sanitary sewer overflow inspections of the above referenced facility. These inspections were conducted in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. These inspections revealed the following violations:

The following items were noted during the May 18, 2011 sanitary sewer overflow inspection:

- 1) Station B did not have the drive shaft guards properly installed.
- 2) There were excessive solids and grease in the wet well of the Burger King station.

The following item was noted during the May 19, 2011 compliance evaluation inspection:

- 1) The facility was reporting a flow weighted monthly average value for CBOD, TSS, and **NH3-N** parameters as required by a previous permit. However, the current permit specifies a non-flow weighted value to be reported for these effluent characteristics.

The **following** items were noted during the May 19, 2011 stormwater "no exposure" (**ARR00C418**) inspection:

- 1) Dried bio-solids were on the ground outside of the covered loading area of the **bio-solids** building.
- 2) The dumpster did not have a lid to prevent exposure of wastes to precipitation.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Branch of this Department. This response should be mailed to the address below and should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response is due by July 4, 2011.

Darrell Phillips, Paragould Light, Water, and Cable
June 24, 2011
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For additional information you may contact the Enforcement Branch by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of assistance, please contact me at greenway@adeq.state.ar.us or 870-935-7221 ext.-15.

Sincerely,



Michael B. Greenway
District 3 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003

Section A: National Data System Coding

Transaction Code	NPDES	Yr/Mo/Day	Inspec. Type	Inspector	Fac. Type
1 [N] 2 [5] 3 [A][R][0][0] 4 [3][3] 5 [7][6][6] 6 [1] 7 [1] 8 [0] 9 [5] 10 [1] 11 [8] 12 [17] 13 [R] 14 [S] 15 [1]					
Remarks					
[2][8]-[0][0][4][7][0]					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 [] [] [] 69	70 [N]	71 [N]	72 [N]	73 [] [] []	74 75 [] [] [] [] [] 80

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Paragould Light, Water, and Cable WWTP 401 Grant Ln. Paragould, AR Greene Co.	Entry Time/Date 08:50 / 05-18-2011	Permit Effective Date February 1, 2010
	Exit Time/Date 11:30 / 05-18-2011	Permit Expiration Date January 31, 2015
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Lisa Ellington / Manager –Environmental Services / 870-239-7795, fax: 870-239-7791	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Darrell Phillips / Chief Operations Officer Paragould Light, Water, and Cable P.O. Box 9 Paragould, AR 72450	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

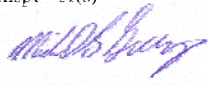
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	N	Flow Measurement	S	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

On the day of this inspection, an unannounced Compliance Evaluation Inspection was planned. Upon arrival at the facility, Lisa Ellington/Manager-Environmental Services advised that she would not be available to participate in the inspection due to a planned Chlorine Leak Drill. As a result a reconnaissance inspection of the facility was conducted and the CEI was conducted the following day (May 19, 2010).

At the time of this inspection, the facility appeared to be operating within the requirements of the permit.
Refer to the letter accompanying the May 19, 2011 CEI for more information.

Name(s) and Signature(s) of Inspector(s) Michael B. Greenway  Brent L. Walker	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Jonesboro (870) 935-7221 ext. 15 / (870) 935-4715 (Fax)	Date June 1, 2011
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE 501-682-0744 / FAX 501-682-0880

www.adeq.state.ar.us

Response:

Pump guards were installed at Station B on May 19, 2011. Refer to photographs below.



Compliance Evaluation Inspection

Violation 1:

The facility was reporting a flow weighted average value for CBOD₅, TSS and NH₃-N parameters as required by a previous permit. However, the current permit specifies a non-flow weighted value to be reported for these effluent characteristics.

Response:

Immediate action was taken to correct the spreadsheet used for calculating DMR values. As of May 2011, averages are reported on DMR as non-flow weighted values for CBOD₅, TSS and NH₃-N. The May 2011 spreadsheet has been attached for your review.

Paragould City Light and Water
Wastewater Treatment Plant Effluent
DMR Calculations

May 2011

Date	Flow (MGD) Effluent	pH (S.U.) Effluent	CBOD (mg/l) Effluent	CBOD (lbs/day) Effluent	CBOD (mg/l) Effluent Weekly	TSS (mg/l) Effluent	TSS (lbs/day) Effluent	TSS (mg/l) Effluent Weekly	NH ₄ -N (mg/l) Effluent	NH ₄ -N (lbs/day) Effluent	NH ₄ -N (mg/l) Effluent Weekly	T. PHOS. (mg/l) Effluent	T. PHOS. (lbs/day) Effluent	T. PHOS. (mg/l) Effluent Weekly	NO ₃ /NO ₂ (mg/l) Effluent	NO ₃ /NO ₂ (lbs/day) Effluent	NO ₃ /NO ₂ (mg/l) Effluent Weekly	D.O. (mg/l) Effluent	Fecal CFU Effluent	Fecal CFU Effluent Weekly	Total Cl ₂ Residual (mg/l) Effluent	
1	5.850																					
2	5.921	7.16	5.9	291		6.0	296		0.3	15		1.1	54		3.4	168		9.16	39		0.05	
3	6.066	7.10	7.7	390		4.8	243		0.3	15		1.1	56		4.8	243		8.67	27		0.04	
4	5.083	7.11	7.3	309		3.6	153		0.6	25		1.3	55		7.2	305		8.37	22		0.06	
5	4.963	7.14	2.8	116		4.0	166		0.4	17		1.5	62		7.8	323		8.98	24		0.03	
6	5.008	7.21	3.2	134	5.4	2.8	117	4.2	0.5	21	0.4	1.7	71	1.3	9.6	401	6.6	7.71	31	28	0.05	
7	4.705																					
8	4.662																					
9	4.822	7.23	8.6	346		8.8	354		0.5	20		1.5	60		7.4	298		8.12	26		0.05	
10	4.758	7.14	10.3	409		6.0	238		0.7	28		1.8	71		9.0	357		7.32	55		0.05	
11	4.776	7.14	8.8	351		5.0	199		0.3	12		2.1	84		11.0	438		8.28	22		0.03	
12	4.724	7.18	4.8	189		5.0	197		0.3	12		2.0	79		9.8	386		7.63	11		0.04	
13	5.373	7.13	3.1	139	7.1	4.4	197	5.8	0.3	13	0.4	2.0	90	1.9	9.8	439	9.4	6.75	57	29	0.04	
14	4.674																					
15	4.358																					
16	4.482	7.11	3.9	146		5.4	202		0.5	19		1.9	71		8.2	307		8.42	5		0.05	
17	4.701	7.13	4.1	161		3.8	149		0.4	16		1.7	67		8.0	314		8.07	37		0.05	
18	4.718	7.09	8.1	319		5.6	220		0.6	24		1.7	67		6.7	264		7.15	28		0.04	
19	4.743	7.13	7.8	309		6.6	261		0.6	24		1.5	59		7.0	277		7.96	57		0.04	
20	5.174	7.13	5.0	216	5.8	8.4	362	6.0	0.5	22	0.5	0.1	5	1.4	8.1	350	7.6	10.76	240	37	0.03	
21	5.612																					
22	4.877																					
23	6.226	7.15	3.2	166		5.4	280		0.7	36		1.6	83		7.1	369		7.72	33		0.04	
24	6.103	7.02	6.6	336		2.6	132		0.9	46		1.3	66		5.9	300		7.60	48		0.05	
25	5.341	7.08	7.5	334		2.4	107		0.6	27		1.4	62		7.3	325		8.10	22		0.05	
26	4.982	7.26	4.4	183		4.0	166		0.5	21		1.6	66		8.7	361		9.10	39		0.07	
27	4.756	7.09	4.7	186	5.3	4.4	175	3.8	0.3	12	0.6	1.8	71	1.5	9.1	361	7.6	8.80	31	33	0.05	
28	4.432																					
29	4.456																					
30	4.633	7.30	14.9	576		14.2	549		0.5	19		2.2	85		8.6	332		8.73	32		0.05	
31	4.440	7.14	12.1	448		13.8	511		0.6	22		2.1	78		9.2	341		7.68	40		0.05	
Max	6.226	7.30	14.9	576	7.1	14.2	549	6.0	0.9	46	0.6	2.2	90	1.9	11.0	439	9.4	10.76	240	37	0.07	
Min	4.358	7.02	2.8	116	5.3	2.4	107	3.8	0.3	12	0.4	0.1	5	1.3	3.4	168	6.6	6.75	5	28	0.03	
Avg	5.014	7.14	6.6	275	5.9	5.8	240	5.0	0.5	21	0.5	1.6	66	1.5	7.9	330	7.8	8.23	32	32	0.05	

D.O.	(mg/l)	Monthly Min	6.75
pH	(S.U.)	Min	7.02
	(S.U.)	Max	7.30
TSS	(lb/day)	Monthly Avg	240
	(mg/l)	Monthly Avg	5.8
	(mg/l)	Weekly Max	6.0
NH ₄ -N	(lb/day)	Monthly Avg	21
	(mg/l)	Monthly Avg	0.5
	(mg/l)	Weekly Max	0.6
T. Phos	(lb/day)	Monthly Avg	66
	(mg/l)	Monthly Avg	1.6
	(mg/l)	Weekly Max	1.9
NO ₃ /NO ₂	(lb/day)	Monthly Avg	330
	(mg/l)	Monthly Avg	7.9
	(mg/l)	Weekly Max	9.4
Flow	(MGD)	Avg	5.014
	(MGD)	Max	6.226
T. Cl ₂ Residual	(mg/l)	Max	0.07
Fecal	CFU/100 mL	Avg	32
	CFU/100 mL	Weekly Max	37
CBOD	(lb/day)	Monthly Avg	275
	(mg/l)	Monthly Avg	6.6
	(mg/l)	Weekly Max	7.1

Stormwater “No Exposure” Inspection

Violation 1:

Dried bio-solids were on the ground outside of the covered loading area of the bio-solids building.

Response:

Dried bio-solids have been cleaned from the ground outside of the covered loading area of the bio-solids facility. See photograph below.

In addition, plans have been made to enclose the loading area of the bio-solids facility to keep bio-solids produced within the confines of the building. PLWC plans to have this completed by the end of 2011.



Cleaned loading area of bio-solids building

Violation 2:

The dumpster did not have a lid to prevent exposure of wastes to precipitation.

Response:

The dumpster has been removed from the grounds of the WWTP. See photograph below.

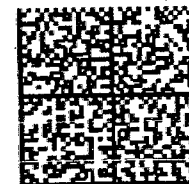


Former dumpster area

CERTIFIED MAIL™



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016H26506815

\$06.20⁰

06/30/2011

Mailed From 72450

US POSTAGE

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CPU U.S. POSTAGE

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FCMF

\$ 0.03⁰

MAILED JUN 30 2011
72450



Paragould Light, Water & Cable
Attention Lisa Ellington
PO Box 9
Paragould, AR 72450

Water Division Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317