

 A R K A N S A S Department of Environmental Quality		WATER DIVISION INSPECTION REPORT			
		AFIN: 28-00047	PERMIT #: AR0033766	DATE: 6/21/2017	
COUNTY: 28 Greene		PDS #: 098369	MEDIA: WN		
GPS LAT: 36.031510 LONG: -90.491631 LOCATION: Entrance					
FACILITY INFORMATION			INSPECTION INFORMATION		
NAME: Paragould Light, Water & Cable LOCATION: 401 Grant Lane CITY: Paragould			FACILITY TYPE: 1 - Municipal		INSPECTOR ID#: 112347 S - State
RESPONSIBLE OFFICIAL NAME: / TITLE Darrell Phillips / General Manager & CEO COMPANY: Paragould Light, Water & Cable MAILING ADDRESS: P.O. Box 9 CITY, STATE, ZIP: Paragould AR 72451 PHONE & EXT: / FAX: / EMAIL:			FACILITY EVALUATION RATING: N		INSPECTION TYPE: Pretreatment Compliance
			DATE(S): 6/21/2017 6/26/2017	ENTRY TIME: 08:20 09:17	EXIT TIME: 15:52 16:22
CONTACTED DURING INSPECTION: Yes			FAYETTEVILLE SHALE RELATED: N		
			FAYETTEVILLE SHALE VIOLATIONS: N		
			INSPECTION PARTICIPANTS		
			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Lisa Ellington, PhD/Manager-Environmental Services Brett Bradford/ Chief Operating Officer		
AREA EVALUATIONS					
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
S	PERMIT	N	FLOW MEASUREMENT	N	STORMWATER
S	RECORDS/REPORTS	N	LABORATORY	N	FACILITY SITE REVIEW
N	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	S	PRETREATMENT
N	OTHER:				
SUMMARY OF FINDINGS					
<p>No violations were noted at the time of the inspection.</p>					
GENERAL COMMENTS					
<p>PLWC maintains a good working relationship with industries. Lisa Ellington is very knowledgeable and monitors the pretreatment program closely. PLWC needs to start determining a transition plan for the pretreatment program for when she retires in the near future.</p> <p>A Compliance Evaluation Inspection, SSO/Collection System inspection, and Stormwater Inspection were all performed in conjunction with this inspection.</p> <p>Brent Walker, District 3 Water Inspector, and Jason Bolenbaugh, Compliance Branch Manager, also participated in this inspection.</p>					
INSPECTOR'S SIGNATURE:  Sarah Frasher				DATE: 7/26/2017	
SUPERVISOR'S SIGNATURE:  Jason Bolenbaugh				DATE: 7/31/2017	

PRETREATMENT COMPLIANCE INSPECTION (PCI) REPORT

Name of Municipality: **Paragould Light, Water & Cable**

AFIN Number: **28-000470**

NPDES Permit Number(s): **AR0033766**

Program Tracked under NPDES Permit Number: **AR0033766**

Fact Sheet Preparation Date: **04-10-2013**

Date of Last PCI/Audit: **07-17-2014**

Date of Last Annual Report: **03-16-2017**

Name of Inspector: **Sarah Frasher**

Date PCI Performed: **06-21-2017**

Name, Title, and Telephone Number of Facility Representative:
Lisa Ellington, PhD./Manager-Environmental Services/(870)239-7795

Name and Title of Other Participants: **Brent Walker/District 3
Water Inspector, Jason Bolenbaugh/ Compliance Branch Manager**

Number of IUs Visited: **2**

Name(s) of IUs Visited: **General Cable and Nidec Motor**

AN IU SITE VISIT FORM SHOULD BE COMPLETED FOR EACH IU VISITED

**NOTE: ANY QUESTION PRINTED IN ALL CAPS AND BOLD PRINT INDICATED
A REGULATORY REQUIREMENT AND MUST BE ANSWERED FOR THE PCI REPORT
TO BE COMPLETE. A NO ANSWER TO ONE OF THESE QUESTIONS SHOULD
RESULT IN AN UNSATISFACTORY RATING.**

Form approved July 1989

A. INDUSTRIAL USER SURVEY

1. List any Significant Industrial Users (SIUs) which have been added or deleted from the program since the last audit or inspection. **Prestolite Wire is now General Cable.**
General Cable and Martin Sprocket Gear do not discharge to PLWC.
2. Has ADEQ or EPA been notified of these changes? Yes
3. **HAS THE INDUSTRIAL USER SURVEY BEEN KEPT UPDATED?** Yes
4. What procedures are being used to update the IU Survey?
PLWC is working on site specific IU surveys. New potential IUs get a survey determined by the information given to City Engineers and chamber of Commerce.
5. Total number of Significant Industrial Users, according to the definition used by the POTW. (This number must be greater than or equal to the answer to question 6) 9
6. Number of Categorical Industrial Users: 6
7. How does the POTW determine the appropriate categorical standards to apply to an IU? 40 CFR 403

8. List all categorical IUs discharging under the approved (such program. Include the name of the IU, the regulatory category as Metal Finishing), and the regulated process (phosphating, zinc plating, etc.) Additional listings can be made in the comments section if necessary.

Name of IU:	Category:	Regulated Process:
Allen Engineering	SIU	Metal Finisher
AMMC	SIU	Healthcare
GRT Rubber Tech	SIU	Rubber Extruder
LA Darling Company	SIU	Metal Finisher
Nidec Motor	SIU	Aluminum Die Caster
Tenneco Automotive	SIU	Metal Finisher
General Cable	NSIU	Metal Finisher (No Discharge)
Martin Sprocket	NSIU	Metal Finisher (No Discharge)
Parker Trutec MMI	NSIU	Non-Categorical

B. LOCAL LIMITS

1. IS THE POTW APPLYING LOCAL LIMITS WHICH HAVE BEEN APPROVED BY ADEQ OR EPA? N/A

2. Describe any apparent problems with the local limits.
N/A

3. How often are pollutant scans of POTW influent, effluent, and sludge performed by the POTW? Does this fulfill the requirements of the approved program (as described in the fact sheet) and part III of the NPDES permit?

Pollutant:	Frequency:	Requirement in		Comments:
		Permit:	Program:	
Metals:				
Influent:	<u>4/year</u>	<u>4/year</u>	<u>Not req.</u>	<u>None</u>
Effluent:	<u>4/year</u>	<u>4/year</u>	<u>Not req.</u>	<u>None</u>
Sludge:	<u>1/year</u>	<u>1/year</u>	<u>Not req.</u>	<u>None</u>
Organics:				
Influent:	<u>1/year</u>	<u>1/year</u>	<u>Not req.</u>	<u>None</u>
Effluent:	<u>1/year</u>	<u>1/year</u>	<u>Not req.</u>	<u>None</u>
Sludge:	<u>1/year</u>	<u>1/year</u>	<u>Not req.</u>	<u>None</u>

4. Have there been any inhibitions or upsets at the POTW (since the last PCI of Audit) which were believed to be caused by industrial discharges? If so, describe the action taken by the City to ensure that the incident would not recur. Were these actions effective?
No inhibitions or upsets.

C. INDUSTRIAL USER CONTROL MECHANISM

1. Is the POTW using the type of control mechanism (permit, agreement, etc.) required by the approved program? Yes

2. How many IU permits (or other control documents) have been issued? 9 (5 year permits)

3. **DO ALL SIGNIFICANT IUS HAVE CURRENT (UNEXPIRED) CONTROL DOCUMENTS? IF NOT, LIST ALL UNPERMITTED SIUS, THE DATE OF EXPIRATION OF THEIR PREVIOUS PERMIT (IF APPLICABLE), AND THE REASON FOR DELAY IN ISSUING THE REQUIRED DOCUMENT.**
Yes

4. Does the control document contain the following items?
An expiration date: Yes

Discharge limitations: Yes

If the program requires self-monitoring by the IUs, do the Permits contain:

IU self-monitoring requirements: N/A

IU reporting requirements: N/A

5. Indicate which of the following recommended standard conditions are contained in the control documents:

Sample location: Yes

Type of sample: Yes

Monitoring frequency: Yes

Bypass prohibition: Yes

Right of entry: Yes

Nontransferability: Yes

Revocation clause: Yes

Penalty Provisions: Yes

Slug load notification: Yes

Notification of process change: Yes

D. MONITORING OF IUS BY POTW

1. Indicate current inspection and sampling frequency and program requirement below:

	Current frequency:	Program Requirement:
Sampling:		
categorical IUs	<u>4/year - 2/month</u>	<u>2/year</u>
other SIUs	<u>1-2/ month</u>	<u>2/year</u>
Inspection:		
categorical IUs	<u>1/year</u>	<u>1/year</u>
other SIUs	<u>1/year</u>	<u>1/year</u>

2. **HAS EACH SIU BEEN INSPECTED AND SAMPLED AT THE FREQUENCY REQUIRED BY THE APPROVED PROGRAM?** Yes

3. Are inspections announced or unannounced? Both

4. Are records kept of each inspection? Yes

5. Does the inspection report contain an adequate description of the following:

Date and time of inspection: Yes

Officials present: Yes

Inspection of chemical storage areas: Yes

Description of regulated processes, categorical waste streams, and discharge location of these waste streams: Yes

Inspection of the pretreatment facilities: Yes

Review of self-monitoring records: N/A

Observation of IU self-monitoring procedures: N/A

Verification that approved analytical techniques are used: N/A

Verification of IU flow measurement (where required): N/A

6. Overall adequacy of inspection documentation: Adequate

7. **DOES THE POTW SAMPLE IUS FOR ALL POLLUTANTS REGULATED IN THEIR PERMITS? (IT IS NOT NECESSARY TO SAMPLE FOR ALL POLLUTANTS EVERY TIME, BUT IT MUST BE DONE PERIODICALLY).**
Yes
-
8. Are analyses performed in accordance with EPA-approved methods (40 CFR 136)? **Yes**
-
9. Are sampling and flow monitoring equipment properly maintained? **Yes (maintained by PLWC)**
-
10. Is the POTW keeping proper field notes and chain of custody forms? **Yes**
-
11. Is the sampling location representative of the discharge to the collection system? **Yes**
-
12. Are sampling locations identified in POTW records? **Yes**
-
13. Are sampling services available in an emergency? **Yes**
-
14. What are the POTW's procedures for tracking receipt and review of IU reports, such as BMR's, semi-annual reports, progress reports, bypass reports, and self-monitoring reports? **Very few reports required-tracked electronically**
-
15. **ARE SELF-MONITORING REPORTS REVIEWED TO VERIFY THAT ANALYSES WERE PERFORMED FOR ALL REGULATED PARAMETERS, AND TO EVALUATE COMPLIANCE WITH EFFLUENT LIMITS?** **N/A**
-
16. **IF VIOLATIONS ARE FOUND IN REPORTS, DOES THE POTW RESPOND TO ALL VIOLATIONS?** **Yes, email followed by a formal letter of noncompliance**
-

17. What are the POTW's procedures for following up violations?
Formal letter of noncompliance

18. **HAS THE POTW REVIEWED BMRS FOR COMPLIANCE WITH 40 CFR 403.12(b)?: BMRS accidentally removed from some of the files; No new facilities added requiring BMRs.**

Review a Baseline Monitoring Report from the POTW's file, and indicate which of the following items can be identified in the BMR:

Name and address: N/E

Other environmental permits held: N/E

Description of operations: N/E

Process flow diagrams: Yes

Flow measurements: N/E

Measurements of regulated pollutants: N/E

Certification of compliance by the IU: N/A

Compliance schedule (if needed): N/A

19. Additional comments on the POTW's inspection and sampling procedures: **Inspection and sampling procedures adequate**

E. Enforcement

1. HAS THE POTW IMPLEMENTED ENFORCEMENT RESPONSE PROCEDURES TO ADEQUATELY ADDRESS EVERY IU VIOLATION OF PRETREATMENT STANDARDS AND REQUIREMENTS? Yes, LA Darling Company, LLC.

2. How does the POTW respond to the following violations?

Effluent limitations: Yes, email followed by formal letter

Late reports: Yes, email followed by formal letter

Unpermitted discharges: Yes, email followed by formal letter

Slug loads or spills: Yes, email followed by formal letter

3. IS THE LIST OF SIGNIFICANT VIOLATORS PUBLISHED BY THE POTW DEVELOPED IN ACCORDANCE WITH EPA REGION VI CRITERIA FOR SIGNIFICANT VIOLATING INDUSTRIAL USER (DATED AUGUST 22, 1985)? Yes

4. List the SIUs which have met the criteria for Significant Violator within the last 12 months, and describe the enforcement action which has been taken by the POTW. If construction is required, please indicate whether the IU has been placed on an enforceable compliance schedule.

Name: LA Darling Company, LLC.	Type of Violation: Limits	Enforcement Action: Notice of Violation	Compliance Deadline: None

5. Comments on the POTW's enforcement procedures:

Adequate

F. POTW'S PRETREATMENT ORGANIZATION STRUCTURE

1. Is the program structure essentially the same as that presented in the approved pretreatment program? **Yes**

2. Are staffing levels adequate? **Yes**

3. Are the responsible officials familiar with the approved program? **Yes**

G. MULTIJURISDICTIONAL ISSUES

1. List any IUs which are located outside of the jurisdictional area of the POTW:
N/A

2. Does the POTW have adequate procedures for controlling IUs located outside its jurisdictional area? **N/A**

3. Does the POTW have copies of permits for IUs in other cities? **N/A**

4. Have any of these IUs met the criteria for Significant Violator? If so, have they been published by the POTW in its annual list of Significant Violators? **N/A**

5. Comments on multijurisdictional issues: **N/A**

H. EVALUATION AND COMMENTS

PLWC maintains a good working relationship with industries. Lisa Ellington is very knowledgeable and monitors the pretreatment program closely. PLWC needs to start determining a transition plan for the pretreatment program for when she retires in the near future.

IU SITE VISIT FORM

Name of Industry: **General Cable**

POTW Name: **Paragould Light, Water & Cable**

Industry Contacts: **Alexis Sowards; Phil Holloway**

Date and Time of Visit: **6/21/2017, 13:47-14:28**

Description of Manufacturing Process:
Wire manufacturer

Sources of Process Wastewater:
No-process discharge; only authorized to discharge wastewater from sanitary sewers to PLWC

Categorical Industry? **Non-Categorical**

Basis for Limits: **N/A**

Point of Application: **N/A**

Description of Pretreatment Equipment and Procedures:
No discharge

Spill Prevention and Solvent Management Procedures:
Containment area for tin plating and all drains go to holding area for proper disposal. Drains in facility are not connected to PLWC collection system.

Sampling Location and Equipment:
Manhole in monitoring station located 200 feet west of the Southeast corner of the facility is still sampled for any pollutants
Facility rents composite samplers with PLWC performing all sample collections

IU SITE VISIT FORM

Name of Industry: **Nidec Motor Corporation**

POTW Name: **Paragould Light, Water & Cable**

Industry Contacts: **David Snodgrass**

Date and Time of Visit: **6/21/2017, 14:46-15:42**

Description of Manufacturing Process:

Die caster processes and shaft machine stamping; mold cooling;
casting quench

Sources of Process Wastewater:

Aluminum die caster processes; rainwater from scrap storage,
drum storage and tank farms; non-contact cooling water;
part washer/tumbler wastestreams; domestic sanitary wastestream

Categorical Industry? **Yes, Aluminum Die Caster**

Basis for Limits: **40 CFR 464.15**

Point of Application: **Prior to discharge to PLWC**

Description of Pretreatment Equipment and Procedures:

Collection tank thence to ultrafiltration and pH is adjusted and
Hydrogen peroxide added thence to holding tank thence to PLWC

Spill Prevention and Solvent Management Procedures:

Containment area around tank farms; covered area for scrap
metal; all drains lead to pretreatment system

Sampling Location and Equipment:

Outfall 001-collection tank following sump on effluent line
from the pretreatment system

Outfall 003-Lift Station wet well; 15 feet south and 65 feet
east of the southeast corner of the Nidec building

Facility rents composite samplers with PLWC performing all
Sample collections.

PPETS CODE SHEET

PRETREATMENT COMPLIANCE INSPECTION (PCI)

INSPECTOR'S NAME:	<u>Sarah Frasher</u>	CODE
NAME OF FACILITY:	<u>Paragould Light, Water & Cable</u>	
PERMIT NUMBER USED TO TRACK PROGRAM:	<u>AR0033766</u>	NPID
DATE OF PCI:	<u>06/21/2017</u>	DTIA

PPETS WENDB DATA ELEMENTS

NUMBER OF SIGNIFICANT IUS (SIUS):	<u>6</u>	SIUS
NUMBER OF CATEGORICAL IUS:	<u>N/A</u>	CIUS
SIUS NOT SAMPLED OR INSPECTED BY POTW:	<u>N/A</u>	NOIN
SIUS WITHOUT CONTROL MECHANISM:	<u>N/A</u>	NOCM
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH STANDARDS OR REPORTING:	<u>N/A</u>	PSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING REQUIREMENTS:	<u>N/A</u>	MSNC
SIUS IN SIGNIFICANT NONCOMPLIANCE WITH SELF-MONITORING AND NOT INSPECTED OR SAMPLED BY POTW:	<u>N/A</u>	SNIN