



P.O. Box 9  
Paragould, AR 72451  
Ph: 870.239.7700  
Fax: 870.239.7798  
[paragould.com](http://paragould.com)

March 21, 2023

Pretreatment Program Submittals  
Arkansas Department of Energy and Environment  
Division of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Re: Pretreatment Program Status Report  
NPDES Permit No. AR0033766

As required by Paragraph D on Page 5 of Part II of NPDES permit AR0033766, Paragould Light Water and Cable (PLWC) is submitting to you the annual list of industrial dischargers who have significantly violated pretreatment requirements. PLWC is also submitting an updated pretreatment program status report.

Using EPA Region 6 revised criteria for significant violation, there were no significant violators to the PLWC sewer system from March 1, 2022 to February 28, 2023. 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 IUs were in SNC. The PLWC pretreatment year begins on March 1.

Since 1995, PLWC has recognized industrial facilities achieving 100% compliance with both wastewater effluent limitations and reporting requirements during a calendar year. Facilities and their representatives are presented with a Pretreatment Award during one of the monthly meetings of the PLWC Board of Commissioners. For the year 2022, 6 out of the 9 permitted industries were eligible to receive the pretreatment award.

If you need any additional information, please contact David Romine, Manager of Environmental Services, at [dromine@paragould.com](mailto:dromine@paragould.com) or (870) 239-7723.

Sincerely,

Brett Bradford  
General Manager/CEO

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

Cc: Ms. Christina McCutcheon

**MONITORING RESULTS FOR THE ANNUAL PRETREATMENT REPORT**  
**REPORTING YEAR: March 1, 2022 TO February 28, 2023**  
**TREATMENT PLANT: Paragould Light, Water & Cable; City of Paragould, Arkansas NPDES PERMIT #AR0033766**  
**AVERAGE POTW FLOW: 3.472 MGD % IU FLOW: 21.3 %**

METALS, CYANIDE and PHENOLS	MAHC (Total) (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		
		Date		Date		Date			Date		Date		EPA MQL (µg/l) (1)	EPA Method Used (1)	Detection Level Achieved (µg/l)		
		Date	Date	Date	Date	Date	Date		Date	Date	Date	Date					
		04/06/2022	07/13/2022	10/05/2022	01/11/2023	04/06/2022	07/13/2022		10/05/2022	01/11/2023	04/06/2022	07/13/2022				10/05/2022	01/11/2023
Antimony	N/A	<2.08	<2.08	<2.08	<2.08	<2.08	N/A	<2.08	<2.08	<2.08	<2.08	<2.08	60	200.8, Rev. 5.4	2.08/2.00		
Cadmium	7.94	0.263	<0.260	0.288	<0.260	0.288	4.0	<0.260	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260/0.250		
Copper	226.73	43.1	54.8	51.8	34.8	51.8	29.5	4.42	5.08	3.59	4.24	0.5	200.8, Rev. 5.4	0.395/0.380			
Lead	30	4.59	1.42	1.63	1.58	1.63	11.	<0.260	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260/0.250		
Mercury	0.27	.00558	.0112	.00620	.00376	.00620	0.01	.000819	.000697	<.0005	.000556	0.005	1631E	0.0005			
Nickel	65.4	5.02	6.98	6.57	6.09	6.57	322.7	1.84	3.02	2.77	1.84	0.5	200.8, Rev. 5.4	0.52/0.50			
Selenium	11.16	<4.94	<4.94	<4.94	<4.94	<4.94	5.6	<4.94	<4.94	<4.94	<4.94	5	200.8, Rev. 5.4	5.2/4.75/4.94			
Silver	138.1	<0.312	<0.312	<0.312	<0.312	<0.312	6.9	<0.312	<0.312	<0.312	<0.312	0.5	200.8, Rev. 5.4	0.312/0.300			
Zinc	500	165	187	329	171	329	281.9	27.1	34.4	52.4	27.2	20	200.8, Rev. 5.4	20.8/20.0			
Chromium	239.28	3.72	5.49	5.12	4.47	5.12	816.8	0.471	0.560	0.380	0.319	10	200.8, Rev. 5.4	0.260/0.250			
Cyanide	18.72	<10	<10	<10	<10	<10	5.8	<10	<10	21	<10	10	4500-CN B, E - 1999	10			
Arsenic	10.9	2.89	1.02	0.814	0.819	0.814	390.5	1.19	0.658	0.739	0.776	0.5	200.8, Rev. 5.4	0.260/0.250			
Molybdenum	23.26	14.9	9.81	14.1	9.64	14.1	N/A	8.43	4.82	6.95	13.7	--	200.8, Rev. 5.4	0.603/0.580			
Phenols	N/A	24.4	43.2	75.8	31.1	75.8	N/A	<5	<5	<5	<5	5	420.1-1978	5			
Beryllium	11.83	<0.260	<0.260	<0.260	<0.260	<0.260	5.915	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260/0.250			
Thallium	N/A	<0.260	<0.260	<0.260	<1.30	<0.260	N/A	<0.260	<0.260	<0.260	<0.260	0.5	200.8, Rev. 5.4	0.260/0.250			
Flow, MGD	N/A	5.593	2.558	2.599	2.836	2.558	N/A	5.857	2.915	2.949	3.708						
(3)																	
None Detected																	

(1) It is advised that the influent and effluent samples are collected considering flow detention time through each 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 either ADEQ Pretreatment staff Excel spreadsheets or the Permittee's consultant with concurrence from Pretreatment staff.

(3) Record the name of any pollutant [40 CFR 122, Appendix D, Table II and/or Table V] detected and the concentration at which they were detected.

MAHL - Maximum Allowable Headworks Level / MAHC – Maximum Allowable Headworks Concentration

WQ - "Water Quality Levels not to exceed" OR actual permit limit.

**ATTACHMENT A**  
**PRETREATMENT PROGRAM STATUS REPORT**  
**UPDATED SIGNIFICANT INDUSTRIAL USERS LIST**

Industrial User Name	SIC/NAICS Code	40 CFR XXX or N/A	Control Document		New User	Times Inspected	Times Sampled	Compliance Status (N/A, C, NC, or SNC)				Permit Limits (Denote parameter violated & number of times)
			Y/N	Last Action				BMR	90-day Compliance	Semi Annual	Self Monitoring	
Allen Engineering 819 S. 5th St. Paragould, AR 72450	333120	40 CFR 433.17	Y	10/01/2019	N	1	11	N/A	N/A	C	N/A	C
AMMC* 900 W. Kingshighway PO Box 339 Paragould, AR 72450	622110	N/A*	Y	08/01/2021	N	1	3	N/A	N/A	N/A	N/A	C
DRIV Automotive** 1601 Hwy. 49B Paragould, AR 72450	3714	40 CFR 433	Y	12/01/2020	N	1	19	N/A	N/A	C	N/A	NC 1 Zinc Daily Limit, 1 Oil & Grease Daily Limit
GRT Rubber Tech. 201 Dana Drive Paragould, AR 72450	32622 339991 326291 31332	40 CFR 428 Subpart G	Y	05/01/2021	N	1	12	N/A	N/A	C	N/A	C
LA Darling Company 1401 Hwy. 49B North Paragould, AR 72450	337215	40 CFR 433.17	Y	05/01/2022	N	1	44	N/A	N/A	C	N/A	C

\*AMMC is a Healthcare Facility and a Non-Categorical Significant Industrial User.

\*\*DRIV Automotive was formerly known as Tenneco Automotive. There were no changes in processes or operations in the facility.

**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	05/01/2018	N	0	5	1 Oil & Grease Daily Limit	N/A	N/A	C	N/A	NC
Nidec Motor Co. Pekin & Scott St. PO Box 520 Paragould, AR 72450	3621	40 CFR 464.115 (b), (c), (h) (No Process Discharge)	Y	04/01/2020	N	0	5	None	N/A	N/A	C	N/A	C
Parker Trutech MMI 2609 North 12 <sup>th</sup> Avenue Paragould, AR 72450	332811	Non-Categorical	Y	07/01/2021	N	1	13	1 Temp Daily Limit	N/A	N/A	N/A	N/A	NC
Prysmian Cable & Systems LLC*** One Prestolite Road P.O. Box 1632 Paragould, AR 72450	3357 3471	Metal Finishing (No Process Discharge)	Y	04/01/2021	N	0	4	None	N/A	N/A	C	N/A	C

Include NAICS Code(s)  
 3rd column - include the CFR # only if the Category has Pretreatment Standards (number or narrative).  
 Please footnote N/A reason.

\*PLWC conducts all sampling and monitoring for the IU, including TFO and PPS.  
 \*\*For this report, Semi-Annual Reports refers to BMP, TFO and/or No Discharge Certification Statements.  
 \*\*\*Prysmian Cable & Systems LLC was formerly known as General Cable Paragould. There were no changes in processes or operations in the facility.

**ATTACHMENT C**  
**SIGNIFICANT NON-COMPLIANT (SNC) INDUSTRIES - ENFORCEMENT ACTIONS TAKEN**

Industrial User Name	Nature of Violation		Number of Actions Taken				Penalties Collected	Compliance Schedule		Current Status	Comments
	Reports	Limits	N.O.V.	A.O.	Civil	Criminal		Other	Date Issued		
Not Applicable											

**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 David Romine Position Environmental Services Manager  
 Contact Telephone (870) 239-7723 NPDES Permit Nos. AR0033766  
 Reporting Period March 1, 2022 February 28, 2023  
                           (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 4  
 Total Number of SSOs due to grease blockages 1 (Roots & Grease)

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>4 / 4</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 / 5</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>86</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>2</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>4</u>
2) No. of Sampling Visits Conducted. . . . .	<u>27</u>
3) No. of Facilities Inspected (non-sampling) . . . . .	<u>1</u>
4) No. of Facilities Sampled . . . . .	<u>4</u>

VI. Non-Significant Permitted Industrial Enforcement Actions

1) No. of Notices of Violations Issued to IUs. . . . .	<u>2</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."

*Scott Bradford*  
Authorized Representative

3/21/2023  
Date