

## Henderson, Katie

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**From:** Gilliam, Allen  
**Sent:** Monday, May 17, 2010 1:55 PM  
**To:** 'djunper@mestek.com'  
**Cc:** 'jcarney@mestek.com'; Henderson, Katie; Garner, Cindy  
**Subject:** Airtherm's (ARP001019) March 2010 Semi-Annual Pretreatment Report (Forrest City AR0020087) Review & Closure Plan



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Dwight,

Airtherm's semi-annual report was received on 3/31/10 and reviewed. The following violations were noted during the review.

#1 & #2. Your wastewater regulated under 40 CFR 433.15 violated the daily maximum and monthly average limits for Zinc. This according to the Environmental Services Co. analytical results (4.5 mg/l) on the wastewater sample taken on 1/19/10. The regulatory limits under the metal finishing category in 40 CFR 433.15 are: Daily Maximum - 2.61 mg/l and Monthly Avg. not to exceed is 1.48 mg/l.

#3 & #4. Under 40 CFR 403.12(g), Monitoring and analysis to demonstrate continued compliance: "(2) If sampling performed by [Airtherm] indicates a violation, [Airtherm] shall notify [ADEQ] within 24 hours of becoming aware of the violation. [Airtherm] shall also repeat the sampling and analysis and submit the results of the repeat analysis to [ADEQ] within 30 days after becoming aware of the violation." Neither of these reports can be located.

Please repeat the sampling (analyze for Zinc only) of the wastewater being discharged to Forrest City's sewage collection system and submit the results within 30 working days to this office. If there are still violations, please submit a corrective action plan within 30 working days of that submittal.

Violation #5. Under 40 CFR 403.12(j) Notification of changed Discharge. [Airtherm] shall promptly notify [ADEQ] (and [Forrest City] if [Forrest City] is not the Control Authority) in advance of any substantial change in the volume or character of pollutants in their Discharge..." No documentation can be located in the file stating that raw materials were to be changed which may alter the wastewater chemistry to be discharged to the City.

Per conversations with you and Mr. Carney yesterday, it was determined galvaneled raw material was now being sent through your iron phosphatizing system. Without basic pretreatment or some form of metals removal system in place, this new raw material was more than likely the cause of the initial violation and should have been recognized with that potential.

If I understood you right, you're currently installing a completely different surface preparation system known as "plafORIZATION". It should be operational by mid-June with no wastewater discharged. Please supply this office with an updated floor plan locating the new equipment and a closure plan for the old phosphatizing system and its chemicals (attached).

If you supply the pertinent information of the virgin material you'll no longer have use for, this office has contacts with other somewhat local Fe phosphatizers who may be interested in talking to you about it, the unused sodium hydroxide (any other chems?) and taking them off your hands.

To close your file out as a non-discharging industrial user, please submit a certified statement to that effect with the closure plan. When do you expect your last day of phosphatizing?

If there is any confusion or further questions regarding any of the information above, feel free to contact this office.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

Cc: Katie Henderson/E-drive/Pretreatment Reports  
Cindy Garner/NPDES Enforcement Branch Manager