

SEARCY WATER AND SEWER SYSTEM

300 NORTH ELM STREET

P. O. BOX 1319

SEARCY, ARKANSAS

72145-1319

CLARENCE O. BUCKNER, MANAGER

February 27, 2009

CERTIFIED MAIL, Return Receipt Requested: 7008 1830 0000 2485 7063

Mr. Allen Gilliam
ADEQ
5301 Northshore Dr.
North Little Rock, AR 72118-5317

Re: Hazardous Waste Notification
Dentists, X-Ray labs, Photo processors, et al

Dear Allen:

We have made the above referenced notification to all the targeted small businesses in our community as directed by your recent e-mails. The lists showing to whom these notifications were sent are enclosed. Also enclosed is a sample of the letter that was sent out.

For the record, I do not entirely agree with your office's interpretation of the pretreatment regulations that precipitated the e-mail requirement for all pretreatment cities in the state to make this notification. However, we complied, nonetheless. Sometime, maybe at the next workshop or conference, we can sit down and have a meaningful discussion regarding this issue.

If you have any questions, please feel free to contact me.

Sincerely,

SEARCY WATER AND SEWER SYSTEM



Daniel K. Dawson
Assistant Manager

Enclosures

SEARCY WATER AND SEWER SYSTEM

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SEARCY, ARKANSAS

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CLARENCE O. BUCKNER, MANAGER

February 27, 2009

Radiology Associates
710 Marion
Searcy, AR 72143

COPY

RE: Hazardous Waste Notification Requirement

Dear Radiology Associates:

The Arkansas Department of Environmental Quality (ADEQ) is requiring all wastewater utilities in the state of Arkansas, including Searcy Water & Sewer System, to notify certain sewer customers of Federal Regulations relating to hazardous wastes. At this time, the ADEQ is specifically requiring our notification of businesses who dispose of the following into the City's sewage system: hazardous waste pharmaceuticals, mercury from amalgam, and/or silver from spent film processing wastes. If your business is not involved in the disposal of any of these materials listed, you do not have to do anything and you do not have any reporting requirements at this time.

However, if you are involved in the disposal of hazardous waste pharmaceuticals, mercury from amalgam, and/or silver from spent film processing wastes into the City's sewage system; please be advised of the following regulations and requirements.

Under the specific pretreatment requirement in **40 CFR 403.12(p)(1)**, "The Industrial User [non-domestic user] shall notify the POTW [appropriate City wastewater official], the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW [City sewage system] of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261."

Under **40 CFR 403.12(p)(4)**, "In the case of any notification made under paragraph (p) of this section, the Industrial User shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree that it has determined to be economically practical." You can find the full requirement with exemptions at the following website address: http://edocket.access.gpo.gov/cfr_2003/julqtr/40cfr403.12.htm.

Please be advised that if your facility does not have an amalgam separator, silver recovery unit, or system of properly disposing of hazardous waste pharmaceuticals, you may be discharging hazardous waste into the City's sewage collections system and would need to follow the above-cited Pretreatment Requirement.

Therefore, if you dispose of hazardous waste pharmaceuticals, mercury from amalgam, and/or silver from spent film processing wastes into the City's sewage system, please submit the required notifications to the following:

- Daniel K. Dawson, Searcy Water & Sewer System, PO Box 1319, Searcy, AR 72145-1319

- Troy Hill, US EPA REGION 6, 1445 Ross Avenue, Suite 1200, Code:6PD, Dallas, TX 75202-2733
- Ryan Benefield, ADEQ Hazardous Waste Chief, 5301 Northshore Drive, North Little Rock, AR 72118-5317

Please DO NOT make any notification to ADEQ or to EPA if you DO NOT dispose of the materials in question. If you require any additional information or explanation, please call Mr. Allen Gilliam at (501) 682-0625.

Sincerely,

SEARCY WATER AND SEWER SYSTEM

Daniel K. Dawson
Assistant Manager

Cc: Allen Gilliam, ADEQ State Pretreatment Coordinator

COPY

Dentists

Searcy Industrial Pretreatment Program
Feb-09

<u>FirstName</u>	<u>LastName</u>	<u>Degree</u>	<u>Address</u>	<u>City</u>	<u>State</u>	<u>Zip</u>
Jason	Bolding	DDS	407 N. Llama	Searcy	AR	72143
Jared	Cox	DDS	1621 E. Beebe Capps	Searcy	AR	72143
Tim	Duke	DDS	710 Marion, Ste. 302	Searcy	AR	72143
Scott	Eichhorn	DDS	2915 E. Moore St., Ste. 1	Searcy	AR	72143
Robert	Fulmer	DDS	1604 E. Moore St.	Searcy	AR	72143
Rick	Johnson	DDS	403 E. Lincoln St.	Searcy	AR	72143
Andy	Kitchens	DDS	3206 Langley	Searcy	AR	72143
Paul	Teed	DDS	204 S. Charles	Searcy	AR	72143
Steven	Molpus	DDS	3206 Langley	Searcy	AR	72143
Keith	Neaville	DDS	1901 E. Beebe Capps	Searcy	AR	72143
Beth	Patterson	DDS	600 W. Arch St.	Searcy	AR	72143
J. D.	Patterson	DDS	333 E. Market St.	Searcy	AR	72143
Dana	Province	DDS	403 E. Lincoln St.	Searcy	AR	72143
Joseph	Scarborough	DDS	2009 W. Beebe Capps	Searcy	AR	72143
Ken	Showalter	DDS	2616 W. Beebe Capps	Searcy	AR	72143
J. Scott	Smith	DDS	2915 E. Moore St., Ste. 2	Searcy	AR	72143
Stephen	Taylor	DDS	2916 Hawkins Dr.	Searcy	AR	72143
Michael	Wise	DDS	333 E. Market St.	Searcy	AR	72143
Jeff	Byrum	DDS	408 W. Vine	Searcy	AR	72143
Richard	Meyer	DDS	601 Marion St.	Searcy	AR	72143
Mike	Lally	DDS	710 Marion	Searcy	AR	72143
Todd	Wyatt	DMD	710 Marion	Searcy	AR	72143

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Labels ✓

<u>Name</u>	<u>Address</u>	<u>City</u>	<u>ST</u>	<u>Zip</u>	<u>FirstName</u>
Clinic Drug of Searcy	1120 S. Main	Searcy	AR	72143	To Whom I
County Drug	3130 E. Race	Searcy	AR	72143	To Whom I
Fred's Pharmacy	2706 E. Race	Searcy	AR	72143	To Whom I
Iken's Sav-On Drug	2221 W. Beebe Capps	Searcy	AR	72143	To Whom I
Lowery Drug Mart	700 Golf Course Dr.	Searcy	AR	72143	To Whom I
Lowery Drug Mart	123 Central	Searcy	AR	72143	To Whom I
Medic Sav-On Drug	2806 E. Race	Searcy	AR	72143	To Whom I
Medical Center Pharmacy	2900 Hawkins Dr.	Searcy	AR	72143	To Whom I
Medical Center Pharmacy West	2505 W. Beebe Capps	Searcy	AR	72143	To Whom I
RX Express	2720 E. Race	Searcy	AR	72143	To Whom I
Stanley Pharmacy	2007 W. Beebe Capps	Searcy	AR	72143	To Whom I
Stotts Drug Co.	103 W. Arch	Searcy	AR	72143	To Whom I
USA Drug	1540 E. Race	Searcy	AR	72143	To Whom I
Walgreen Drug Pharmacy	200 E. Race	Searcy	AR	72143	To Whom I

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Photo Processing Labs & Photographers
Searcy Industrial Pretreatment Program

<u>Name</u>	<u>Address</u>	<u>City</u>	<u>State</u>	<u>Zip</u>	<u>FirstName</u>
Image Masters Photo Lab	109 W. Arch St.	Searcy	AR	72143	
George Dillin Photography	1407 E. Moore St.	Searcy	AR	72143	Dillin
Baker Photography	107 W. Arch St.	Searcy	AR	72143	Baker
Wal-Mart Supercenter 1-Hour Photo	3509 E. Race	Searcy	AR	72143	
USA Drug 1-Hour Photo	1540 E. Race	Searcy	AR	72143	
Jeff Montgomery, Photo Services	HU Box 12234	Searcy	AR	72149	Montgomer
The Daily Citizen	3000 E. Race	Searcy	AR	72143	
Staples	3500 E. Race	Searcy	AR	72143	
Truth for Today	2209 S. Benton	Searcy	AR	72143	
Danny Wood, Harding Press	HU Box 12237	Searcy	AR	72143	Wood
Kimberly Brackins Photography	501 E. Race	Searcy	AR	72143	
Walgreen Drugstore Photo Lab	200 E. Race	Searcy	AR	72143	
Images by Gayle	2013 W. Beebe Capps	Searcy	AR	72143	
Taylor Made Fine Photography	210 W. Center	Searcy	AR	72143	

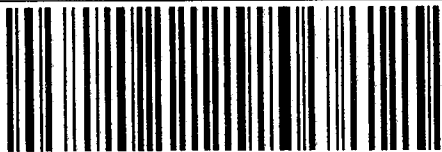
*Printed ✓
labels ✓*

X-Ray contacts
Searcy Industrial Pretreatment Program

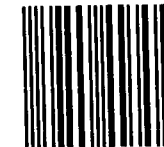
<u>Name</u>	<u>Address</u>	<u>City</u>	<u>State</u>	<u>Zip</u>
Radiology Associates	710 Marion	Searcy	AR	72143
Searcy Medical Center	2900 Hawkins Dr.	Searcy	AR	72143
Searcy Clinic for Women	406 Rodgers Dr.	Searcy	AR	72143
Searcy Children's Clinic	1407 E. Race	Searcy	AR	72143
Radiology Associates	1300 S. Main St.	Searcy	AR	72143
Searcy Open MRI	2019 E. Race	Searcy	AR	72143
Gastroenterology Associates	710 Marion	Searcy	AR	72143
Baines Chiropractic Center	303 E. Center St.	Searcy	AR	72143
Chiropractic Care Clinic	2924 Hawkins Dr.	Searcy	AR	72143
Crabtree Specific Chiropractic	607 E. Race	Searcy	AR	72143
Evans Chiropractic Clinic	400 W. Race	Searcy	AR	72143
Hulvey Chiropractic Clinic	601 N. Spruce	Searcy	AR	72143
Total Health Chiropractic Center	3005 Hawkins Dr.	Searcy	AR	72143
Chiropractic First	2117 Beebe Capps	Searcy	AR	72143
Searcy Foot Clinic	1700 E. Moore	Searcy	AR	72143
Wadley Animal Clinic	306 Evans Dr.	Searcy	AR	72143
Central Arkansas Cancer Center	415 Rogers Dr.	Searcy	AR	72143
Little Rock Cardiology Clinic	305 Rogers Dr.	Searcy	AR	72143
Searcy Animal Clinic	2400 S. Main St.	Searcy	AR	72143
Central Arkansas Cardiology	P. O. Box 77	Searcy	AR	72145
Westside Veterinary Clinic	2115 W. Beebe Cap	Searcy	AR	72143
Joseph Medical Clinic	1304 S. Main St.	Searcy	AR	72143
Holt Chiropractic	1201 E. Beebe Cap	Searcy	AR	72143

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U.S. POSTAGE
PAID
SEARCY, AR
72143
FEB 27, 09
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72118

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00051413-01

SEARCY WATER AND SEWER SYSTEM

300 NORTH ELM STREET

P. O. BOX 1319

SEARCY, ARKANSAS 72145-1319

**RETURN RECEIPT
REQUESTED**



Mr. Allen Gilliam

ADEQ

5301 Northshore Dr.

North Little Rock, AR 72118-5317

