

## Gilliam, Allen

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**From:** Gilliam, Allen  
**Sent:** Tuesday, February 14, 2012 8:58 AM  
**To:** 'jmcpherson@hmmusa.com'  
**Cc:** 'jshempert.waterdept@yahoo.com'  
**Subject:** AR0021971\_HINO Motors (ARP001025) Baseline Monitoring Report and other requirements\_20120213  
**Attachments:** BMR Metal Finishing Form 2012.doc

Jerry,

As per our phone conversation last week, please find attached the first report required of HINO Motors as your facility discharges Federally regulated (categorical) wastewater into the City of Marion's sewage collection system, a.k.a. Publicly Owned Treatment Works (POTW).

This office appreciates your openness in briefly discussing HINO's basic wastewater generating processes. The Zn Phosphatizing bath is a core operation under the Metal Finishing standards in 40 CFR 433 with specific limitations in 40 CFR 433.17 (new source).

ADEQ is not permitting indirect dischargers such as yours at this time. The Federal Pretreatment Standards are self-implementing. ADEQ is required under our MOU with EPA Region 6 to act as the "Control Authority" in cases where a categorical industry is discharging regulated wastewater into a city's sewage collection system who does not have an approved Pretreatment Program. This is the case for the City of Marion.

ADEQ will assess HINO's Pretreatment compliance through submittal of required semi-annual reports (unless City officials require more frequent tests) from HINO and periodic inspections with sampling.

Please reference your Pretreatment Tracking # ARP001025 as well as Marion's NPDES # (see subject line) in any correspondence such as requested below.

Please submit the completed Baseline Monitoring Report (BMR) by March 14, 2012. By the letter of the regulations, it was due 180 days prior to discharge of regulated wastewater to the City. If there are any questions, please feel free to contact this office.

Please submit the American Interplex analysis you mentioned last week.

All correspondence can be electronically sent as long as any pdf attachments' signatures are legible.

Your future reporting requirements to ADEQ are located in 40 CFR 403.12 @ <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=7d114d818322c667904d90525feb151c&rgn=div8&view=text&node=40:29.0.1.1.4.0.1.12&idno=40> (cut and paste link onto your browser if it "wraps around" your screen and won't open). ADEQ has pre-prepared forms for your semi-annual reports which will be sent once the attached BMR is satisfactorily completed.

As a professional courtesy, Jim Shempert (cc'd above), Marion's Utility Manager should be copied on all correspondence.

Again, thank you for your cooperation in coming into compliance with the National Pretreatment Regulations.

Sincerely,

Allen Gilliam

ADEQ State Pretreatment Coordinator  
501.682.0625

cc: Jim Shempert, City of Marion, Utility Manager