

## Gilliam, Allen

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**From:** Gilliam, Allen  
**Sent:** Monday, March 05, 2012 4:20 PM  
**To:** Brad Stewart  
**Cc:** Jennifer Enos; Henderson, Katie; Ramsey, David; Anderson, Alan  
**Subject:** AR0022063\_Springdale\_AFIN 7200003\_Jan 2012 Annual Pretreatment Report reply\_20120305

Brad,

Your January 2012 annual Pretreatment Report was received on 1/30/12, reviewed, deemed complete and compliant with the Federal Pretreatment Regulations in 40 CFR 403.12(i). There are no further actions necessary at this time.

Comment:

You have your four (4) "no discharge" permitted categoricals listed as significant industrial users (SIUs) on the third page of your Pretreatment Program Status (PPS) Report titled, "UPATED SIGNIFICANT INDUSTRIAL USERS LIST..." It is advisable to re-classify them as "non-significant, no-discharge permitted categoricals". Modifications on that same summary sheet can be made to facilitate this delineation. There's a handful of other Pretreatment cities that have done the same.

As long as the control authority designates an industry as an SIU, inspections and sampling events are still required at least once/year per 40 CFR 403.8(f)(2)(v), "Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards. Inspect and sample the effluent from each Significant Industrial User [SIU] at least once a year..."

By classifying them as "non-significant, no-discharge permitted categoricals", it would further explain to an outside party why you have inspected and sampled only two (2) of your six (6) categorical industries as shown on page 2 of your PPS. Apologies for not bringing this to your attention sooner.

If there are comments or questions, please feel free to contact this office.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625