

From: [Gilliam, Allen](#)
To: water@cavecity.us
Cc: [Shafii, Mo](#); [Wiberley, Christian G.](#); [Burrow, Kealey](#)
Subject: AR0022110_Cave City Clarification to Notification of Changed Discharge Requirements with supporting information_20150831
Date: Monday, August 31, 2015 9:04:10 AM

James,

Sorry, but thought I better **clarify** the note below and will stand corrected. Your "Change Discharge" notice is technically correct.

Under the National Pretreatment Program, if an Effluent Limitations Guideline does not have Pretreatment Standards (for "indirect dischargers" like UniFirst), the National Pretreatment Programs around the country don't recognize that "Category" as having Effluent Limitation Guidelines.

None of the Textile Mills' nine Subparts (under 40 CFR 410 [yes, an Effluent Guideline]) have Pretreatment standards.

Please call if you have any questions.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

From: Gilliam, Allen
Sent: Friday, August 28, 2015 12:03 PM
To: 'water@cavecity.us'
Cc: Burrow, Kealey; Shafii, Mo; Wiberley, Christian G.; Peltier, Hannah
Subject: AR0022110_Cave City Notification of Changed Discharge Requirements with supporting information_20150828

James,

Your notification of changed discharge along with supporting documents have been received by ADEQ per your NPDES permit requirements.

Note: Questions a. and a.i. on the notification form are answered incorrectly. UniFirst's processes are not subject to any Federal Effluent Limitation Guideline **with Pretreatment Standards**; therefore, that fact is noted in this electronic response.

Per phone conversations with Cave City personnel, the City's dry weather flow was estimated at ~0.23 MGD. UniFirst's estimated flow of 0.025 MGD is ~11% of the City's dry weather flow so it

does meet the definition of a Significant Industrial User per 40 CFR 403.3(v)(ii) which you've answered correctly.

Cave City must remain compliant with its NPDES permit limitations if it decides to accept UniFirst's process wastewater. The decision to allow UniFirst to connect and discharge its process wastewater is solely at the City's discretion.

Thank you for notifying this agency of the change in discharge.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

From: water@cavecity.us [<mailto:water@cavecity.us>]

Sent: Wednesday, August 26, 2015 4:01 PM

To: Water Permit Application

Subject: Notification of Changed Discharge Requirements - NPDES Permit # AR0022110

We have been working with UniFirst on an expansion of their local factory. Allen Gilliam with ADEQ has been a tremendous help to us in this process!

We are now ready to proceed with allowing the Significant User to perform a test discharge into our treatment system. Per Allen Gilliam's advise, this will be a batch discharge with a die pack for tracing purposes. If all our lab results are good, we hope to approve the permit for discharge in September 2015.

Attached you will find our Notification of Changed Discharge Requirements form. I have also attached their lab samples for your review. Please contact me anytime at the number below, or my cell phone at (870) 283-2789.

Thank you,

James M. Smith

Cave City Water & Sewer Dept.

120 E Spring St

PO Box 69

Cave City, AR 72521

(870) 283-5563