



A R K A N S A S
Department of Environmental Quality

May 15, 2007

Brian M^CCasland
B&M Painting
347 Van Buren
Camden, AR 71701

Re: B & M Painting's Compliance with the National Pretreatment Regulations

Dear Mr. M^CCasland,

This office is updating data on categorical industries in non-Pretreatment cities. The latest information received from the City indicated Zinc phosphating was one of your wastewater generating processes. A Baseline Monitoring Report (BMR) from you is required at this time. The wastewater from this operation is subject to Federal and State Regulations covered under 40 CFR 403 (Pretreatment Regulations), specifically those under the metal finishing effluent guidelines in 40 CFR 433. To wit:

§ 433.10 Applicability; description of the metal finishing point source category.

(a) Except as noted in paragraphs (b) and (c), of this section, the provisions of this subpart apply to plants which perform any of the following six metal finishing operations on any basis material: Electroplating, Electroless Plating, Anodizing, Coating (chromating, **phosphating**, and coloring), Chemical Etching and Milling, and Printed Circuit Board Manufacture.

Submission of the attached BMR is required under 40 CFR 403.12(b) and the Arkansas Code Annotated (ACA) 8-4-216 within thirty (30) days from receipt of this correspondence. Contained within this BMR (enclosed) is the following information:

CFR 403.12(b)(1) Identifying information: The User shall submit the name and address of the facility including the name of the operator and owners;

(2) Permits. The User shall submit a list of any environmental control permits held by or for the facility;

(3) Description of operations. The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification [and NAICS] of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes.

(4) Flow measurement. The User shall submit information showing the measured average daily and maximum daily flow, in gallons per day, to the POTW from each of the following:

(i) Regulated process streams; and

(ii) Other streams as necessary to allow use of the combined wastestream formula of § 403.6(e).

(See paragraph (b)(5)(v) of this section). The Control Authority [ADEQ] may allow for verifiable estimates of these flows where justified by cost or feasibility considerations.

(5) Measurement of pollutants.

(i) The user shall identify the Pretreatment Standards applicable to each regulated process.

(ii) In addition, the User shall submit the results of sampling and analysis identifying the nature and concentration...of regulated pollutants in the discharge from each regulated process. Both daily maximum and average concentration (or mass, where required) shall be reported. The sample shall be representative of daily operations...

(iii) A minimum of four (4) grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organics. For all other pollutants, 24-hour composite samples must be obtained through flow-proportional composite sampling techniques where feasible. The Control Authority [ADEQ] may waive flow-proportional composite sampling for any Industrial User that demonstrates that flow-proportional sampling is infeasible. In such cases, samples may be obtained through time-proportional composite sampling techniques or through a minimum of four (4) grab samples where the User demonstrates that this will provide a representative sample of the effluent being discharged.

(iv) The User shall take a minimum of one representative sample to compile that data necessary to comply with the requirements of this paragraph.

(v) Samples should be taken immediately downstream from pretreatment facilities if such exist or immediately downstream from the regulated process if no pretreatment exists. If other wastewaters are mixed with the regulated wastewater prior to pretreatment the User should measure the flows and concentrations necessary to allow use of the combined wastestream formula of § 403.6(e) in order to evaluate compliance with the Pretreatment Standards...

(vi) Sampling and analysis shall be performed [by an ADEQ certified lab and] in accordance with the techniques prescribed in 40 CFR part 136 and amendments thereto...

(vii) The Control Authority may allow the submission of a baseline report which utilizes only historical data so long as the data provides information sufficient to determine the need for industrial pretreatment measures;

(viii) The baseline report shall indicate the time, date and place, of sampling, and methods of analysis, and shall certify that such sampling and analysis is representative of normal work cycles and expected pollutant Discharges to the POTW...;

(6) Certification. A statement, reviewed by an authorized representative of the Industrial User (as defined in paragraph (k)(1) of this section) and certified to by a qualified professional, indicating whether Pretreatment Standards are being met on a consistent basis, and, if not, whether additional operation and maintenance (O and M) and/or additional Pretreatment is required for the Industrial User to meet the Pretreatment Standards and Requirements; and

(7) Compliance schedule. If additional pretreatment and/or O and M will be required to meet the Pretreatment Standards; the shortest schedule by which the Industrial User will provide such additional pretreatment and/or O and M. The completion date in this schedule shall not be later than the compliance date established for the applicable Pretreatment Standard.

Submit a comprehensive narrative of your operations (from raw material in, to product out) as well as a legible and comprehensive schematic of your plant layout indicating/identifying where your wastewater processes are located. Include any pretreatment equipment (and its layout), all floor drains, chemical storage areas/handling practices, clean-out plates, secondary containment, bathrooms, sampling point where (only the) regulated wastewater is sampled and a complete list of your material safety data sheets (MSDS).

Again, submittal of a complete, certified BMR is required in writing within thirty (30) days from receipt of this correspondence. It would be prudent for you to contact an ADEQ certified lab to ensure an expedited analysis of a representative sample of your wastewater can be obtained to

meet this deadline. The following pollutants are regulated with standards not to exceed in 40 CFR 433.17:

433.17 Pretreatment standards for new sources (PSNS).

(a) Except as provided in 40 CFR 403.7, any new source subject to this subpart that introduces pollutants into a publicly owned treatment works must comply with 40 CFR part 403 and achieve the following pretreatment standards for new sources (PSNS):

PSNS

Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
	Milligrams per liter (mg/l)	
Cadmium (T)	0.11	0.07
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.20	0.65
TTO	2.13	

(b) Alternatively, for industrial facilities with cyanide treatment, and upon agreement between a source subject to these limits and the pollution control authority, the following amenable cyanide limit may apply in place of the total cyanide limit specified in paragraph (a) of this section:

Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed
	Milligrams per liter (mg/l)	
Cyanide (A)	0.86	0.32

(c) No user subject to the provisions of this subpart shall augment the use of process wastewater or otherwise dilute the wastewater as a partial or total substitute for adequate treatment to achieve compliance with this limitation.

(d) An existing source submitting a certification in lieu of monitoring pursuant to §433.12 (a) and (b) of this regulation must implement the toxic organic management plan approved by the control authority.

Future reporting requirements to ADEQ and the City may be found in 40 CFR 403.12.

If you should have any questions or comments, feel free to contact this office at (501) 682-0625.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator

Encl: ADEQ Baseline Monitoring Report

cc: Dennis Benson / NPDES Enforcement Division Manager
Mo Shafii / NPDES Permits Division Manager
David Richardson / Assistant Manager / Camden Wastewater Utilities / P.O. Drawer J /
Camden, AR 71711