

Wilson, Tabatha

From: Gilliam, Allen
Sent: Wednesday, July 02, 2014 1:13 PM
To: dezell@bmpaint.com
Cc: tpayne@bmpaint.com; bmac@bmpaint.com; lab@bmpaint.com; Fuller, Kim; Anderson, Alan; davidrcamdenh2o@cablelynx.com; Wilson, Tabatha
Subject: AR0022365_B and M Painting ARP001058 July 2014 request for complete process description and ww flow schematics_20140702

Denver,

Per our phone conversation this morning, it was apparent you understood what is required under 40 CFR 403.12(b). Please submit comprehensive narrative process descriptions and comprehensive wastewater flow schematics for both B&M Paintings' Bldgs #1 and #4 within thirty (30) days from the date on this electronic correspondence.

You have been provided adequate examples from two (2) other categorical industries within the state to work with.

This submittal will bring B&M into full compliance with the Pretreatment reporting requirements.

As also discussed, regardless of what you have been previously instructed, separate samples should be taken from Bldg #1 and Bldg #4's sampling points (downstream of treatment – ion exchange) and reported separately on two (2) separate semi-annual reporting pages #2 with a more precise regulated wastewater batch discharge frequency (once/week, once/month, etc.). These two (2) separate samples from your two (2) separate regulated wastestreams discharged at different times will satisfy the representative samples requirement in 40 CFR 403.12.

Thank you for your cooperation and time in this endeavor.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Alan Anderson, NPDES Enforcement Analyst
David Richardson, Camden General Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Denver Ezell [<mailto:dezell@bmpaint.com>]
Sent: Monday, June 30, 2014 4:55 PM
To: Gilliam, Allen
Cc: tpayne@bmpaint.com; bmac@bmpaint.com; lab@bmpaint.com
Subject: RE: Updated flow diagrams for POTW rinse-waters

Hello Allen:

I just have had a chance to catch up on e-mails. Sorry for the delay. We have 3 new projects that I'm assisting on and it's got me running!

I, like you, would rather 'talk' about these issues than e-mail them. Will you allow me til Wednesday morning to review and comment on your e-mail? I've made notes from it already to address each one and not skip over any of them.

A couple of quick things, however.

- We don't do any powder coating at any of our facilities. **Duly noted**
- **BLDG 4, right?** Our Phosphate 'seal' is a chromate product as specified for military applications so it goes to WWIX due to hex chrome. **What's the purpose for its *previous phosphate (pH acidic?) stage? A conversion coating in prep for the phosphate ("chromate product") seal? (I hate using the internet, but see http://en.wikipedia.org/wiki/Chromate_conversion_coating for an example). Also see [Regulatory Determination for the "PreKote" Surface Preparation Process \(PDF\)](#) for possible alternative used by the military (not categorized/regulated under 40 CFR 433).**
- The alkaline cleaner (for either process bldg) and the etch (for either process bldg) are the only actual 'chemical' baths (AND the "...chrome rinses [that] are flowed to the (WWIX)")? that can go to POTW. **The alkaline cleaner and etch are not depicted on either w.w. flow schematic although narratively described on "Bldg 1 - Main Process". No process description for Bldg 4.**
The alkaline cleaner is kin to a heavy duty tide soap. The etch, of course, is a quite dilute sodium hydroxide with saponifiers.
- Both (meaning both process bldgs) deoxidizers and chem-films (c.-fs. **not depicted on BLDG 1's w.w. flow schematic unless its tank is labeled something else**) are captured in totes when spent and sent off as waste **Again, noted on "BLDG 1 – Main Process" narrative, but no process narrative for BLDG 4.**
- The ***Zinc phosphate bath in bldg 4 is loaded with zinc.** Our max for zinc discharge to POTW is 2.61 mg/L.....per day. So, when spent, we capture bath in totes and it is shipped off as hazardous waste
- And, without complaint.....We are combining them because of Rufus' direction to do so. I'm open to however you say is more compliant **"more compliant" is not the term we're looking for.** EPA regs require **"Representative samples"** (see 40 CFR 403.12(g)(3) @ <http://www.ecfr.gov/cgi-bin/text-idx?SID=862e92f678a980d358a785898d221e6c&node=40:29.0.1.1.4&rgn=div5#40:29.0.1.1.4.0.1.12>). **Unless your outfalls/piping from "POTW #1" and "POTW #2" are connected and your regulated/treated wastewater (from both Bldgs) is discharged and sampled at the same time, one sample is not representative of w.w. from Bldg 1 and Bldg 4 on the day their it is discharged. Would you not agree?**

***Is this phosphate tank the same in the one?**

Please let me know if Wednesday morning is okay. **Wednesday a.m. is fine with me.** Thank you for a response so I can figure how your processes and w.w. flow schematics match up.

Regards,

Denver Ezell
(870) 836-3388 Ext. 19 Office
(870) 818-7880 Business Cell