

ADEQ

ARKANSAS
Department of Environmental Quality

June 5, 2009

Bob D. Taylor, Jr.
Safety Leader
Defiance Metal Products
944 Bypass Road
Heber Springs, AR 72543

Re: Defiance Metal Products (#ARP001047; AFIN#1200029) Semi-Annual Pretreatment Report
Discharging to Heber Springs NPDES #AR00022381

Dear Mr. Taylor,

As per today's conversations with you and Tim Bartley (Defiance), this office believes we have recognized and adequately solved the Zn non-compliance reported on your last semi-annual report dated 5/29/09.

As agreed, you will submit an addendum to that report showing all the analyticals done during the last six months recalculating the "Avg. Measured".

You are in a unique situation now with the purchase of the atomic absorption spectrometer currently analyzing your wastewater 2/week. Per concurrence with our Technical Services Division personnel, those results may also be used for compliance purposes.

The toxic organic management plan (TOMP) discussed should also be submitted as soon as possible for approval by this office. This will allow you to make the certification statement in 40 CFR 433.12(a) in lieu of monitoring for the toxic organics. EPA guidance for developing a TOMP can be found at the following website: <http://www.epa.gov/npdes/pubs/owm0021.pdf>. Appendix D of this manual has a quite extensive example of a comprehensive TOMP. Yours would certainly not need this level of detail after learning more about your operations today.

It was a pleasure talking to you and your staff. Appreciation is extended for your understanding and cooperation regarding these matters.

Sincerely,



Allen Gilliam
ADEQ State Pretreatment Coordinator

NPDES PERMIT FILE

NPDES # AR00022381

AFIN # 12-00029

Permit PN

Correspondence

Technical Backup

6/8/09 Date Scanned