

Gilliam, Allen

From: Barry Tim <tim.barry@st-ji.com>
Sent: Tuesday, January 10, 2012 11:51 AM
To: Gilliam, Allen
Subject: RE: AR0022381_Saint Jean (ARP001050) Dec 2011 response to ADEQ Nov 2011 CAV requirements reply_20120109

Hello Allen-all of the statements 1-4 identified below are correct. You will be the first to know if we have any changes. TX for all of your help/support-Tim

Tim BARRY

EHS Coordinator

Saint Jean Industries Inc
Innovative Solutions
424 Industrial Park Road
USA - AR - 72543 Heber Springs
Tel :+1 501 362 9500
Mob: +1 501 887 6304

From: Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]
Sent: Tuesday, January 10, 2012 7:31 AM
To: Barry Tim
Cc: 'hswd@sbcglobal.net'
Subject: AR0022381_Saint Jean (ARP001050) Dec 2011 response to ADEQ Nov 2011 CAV requirements reply_20120109

Tim,

Your response to ADEQ's 11/8/11 compliance assurance visit (CAV) was received and deemed adequate in addressing the administrative deficiencies found. The diagram(s) sent of your facility's processes and narrative description of the same will be deemed acceptable for purposes of 40 CFR 403.12(b).

Let us please put the following issues to rest:

- 1) The regulated wastewater from the heat treat quench tank is continually close-loop circulated through its dedicated cooling tower with no daily "blow-down" to the City's sewer system;
- 2) As per your narrative process wastewater description, if that quench tank wastewater (~1,000 gallons) needs to be emptied..."for maintenance-related activities, the water can be sent back to the cooling tower via internal plumbing or boiled off via an in-house evaporator";
- 3) As per our phone and e-mail correspondence the quench tank's dedicated cooling tower "vault" is very infrequently (every 7 to 10 years) batch discharged to the City's sewage system at an estimated volume of 26,000 gallons; and
- 4) During that batch discharge period Saint Jean will collect four (4) representative grab samples of that batched wastewater (equally time spaced over the batch discharge period) and have it analyzed for compliance with the Pretreatment Standards in 40 CFR 467.46.

If all the above statements are correct, please e-respond accordingly for Saint Jean's and ADEQ's files.

Sincerely,

Allen Gilliam

ADEQ State Pretreatment Coordinator
501.682.0625

ec: Donald Knight/General Manager/Heber Springs Wastewater

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