

Gilliam, Allen

From: Gilliam, Allen
Sent: Wednesday, June 29, 2011 11:07 AM
To: 'Cothren Greg'
Cc: 'hswd@sbcglobal.net'; Fuller, Kim
Subject: AR0022381_Saint Jean (ARP001050) May 2011 Semi-Annual Pretreatment Report Addendum Response_20110629

Greg,

Your addendum to Saint Jean's May 2011 semi-annual pretreatment report was received, reviewed, deemed complete and compliant with the National Pretreatment Regulations per 40 CFR 403 and specifically the categorical Aluminum Forming Standards in 40 CFR 467.46. No further action is deemed necessary at this time.

Thank you for your attention to this matter.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

cc: Donald Knight, Heber Springs Utilities Manager

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From: Cothren Greg [mailto:greg.cothren@st-ji.com]
Sent: Thursday, June 16, 2011 9:27 AM
To: Gilliam, Allen
Subject: RE: AR0022381_Saint Jean (ARP001050) May 2011 Semi-Annual Pretreatment Report Response_201105023

Allen,

I have attached the updated revisions to our May 2011 Semi Annual Waste water Report. The Cyanide (CN) testing has been added to the final report, preliminary testing report added, and calculating information is attached. Saint Jean must apologize for the oversight in our filling and will assure these mistakes will not happen in our future.

Thank you,

Greg Cothren
Environmental Health & Safety Coordinator
tele. (501)362-9572
fax (501)362-9568

Saint Jean Industries, Inc.
424 Industrial Park Road
Heber Springs, AR 72543
(501)362-9500

From: Gilliam, Allen [mailto:GILLIAM@adeq.state.ar.us]
Sent: Thursday, May 26, 2011 11:58 AM
To: Cothren Greg

Cc: Fuller, Kim; 'hswd@sbcglobal.net'

Subject: AR0022381_Saint Jean (ARP001050) May 2011 Semi-Annual Pretreatment Report Response_201105023

Greg,

Your May 2011 Semi-Annual Pretreatment report was received electronically on 5/18/11 and reviewed. This office cannot deem it complete nor compliant with the Aluminum Forming Category in 40 CFR 467.

Your production based Cr, Zn equivalent limits and O&G alternative limits are compliant upon using your reported production and flows for calculating equivalent concentration limits during the six-month reporting period.

Under the Pretreatment Standard for New Sources (PSNS) in **40 CFR 467.46, Subpart D** (see http://edocket.access.gpo.gov/cfr_2003/julqtr/40cfr467.46.htm)

Solution Heat Treatment Contact Cooling Water

Pollutant or pollutant property	PSNS	
	Maximum for any 1 day average	Maximum for monthly
	mg/off-kg (lb/million off-lbs) of aluminum quenched	
Chromium.....	0.76	0.31
Cyanide.....	0.41	0.16
Zinc.....	2.08	0.86
TTO.....	1.41	
Oil and grease (alternate monitoring parameter).....	20.37	20.37

Saint Jean is required to show compliance with the cyanide limit **OR**:

Per **40 CFR 467.03**, "Monitoring and reporting requirements. The following special monitoring and reporting requirements apply to all facilities controlled by this regulation.

(a) Periodic analyses for cyanide as may be required under part 122 or 403 of this chapter are not required when **both** of the following

conditions are met:

(1) The first wastewater sample of each calendar year has been analyzed and found to contain less than **0.07 mg/l** cyanide. **[AND]**

(2) The owner or operator of the aluminum forming plant certifies in writing to the POTW authority or permit issuing authority that cyanide is not and will not be used in the aluminum forming process."

This requirement is also included in the small print at the top of page 3 of your semi-annual report under "(6) CERTIFICATION". That language could have been made clearer.

The first requirement has been overlooked since 5/22/06 (the oldest semi-annual report located in your file) with Saint Jean only making the certification statement in (2) above since. Saint Jean must submit a CN analysis at least once per year to be compliant with the federal Aluminum Forming Pretreatment Standards.

Please submit to this office a CN analysis (in mg/l) of your regulated wastewater within thirty (30) days of the date of this e-mail transmission as an addendum to your May 2011 Semi-Annual Report.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

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ec: Don Knight/City General Manager/Heber Springs Wastewater