

Gilliam, Allen

From: Gilliam, Allen
Sent: Thursday, May 26, 2011 11:58 AM
To: greg.cothren@st-ji.com
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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cc: Don Knight/City General Manager/Heber Springs Wastewater