

Gilliam, Allen

From: Gilliam, Allen
Sent: Wednesday, March 14, 2012 10:08 AM
To: paragould lisa ellington
Cc: Henderson, Katie; Anderson, Alan
Subject: AR0033766_Paragould March 2012 Annual Pretreatment Report reply_20120313

Lisa,

Your March 2012 Annual Pretreatment Report was received by this office on 3/9/12, reviewed, deemed complete and compliant the Federal Pretreatment Regulations in 40 CFR 403.12(i). No further action is necessary at this time.

Comments:

- 1) You've listed MMI-TruTech as a declassified metal finisher and yet still on the report's Attachment A, "Updated Significant Industrial Users [SIU] List". After our phone conversation this afternoon, it is your option to footnote them as a non-significant, yet permitted industry" as many other cities have done around the State. If, in your opinion, they do not meet the definition of a Significant Industrial User per 40 CFR 403.3(v) reclassifying them as such can give you more flexibility in your sampling/inspection frequency. Retaining them as SIU requires you to sample and inspect them at least once per year.

The above scenario can also be applied to Arkansas Methodist Medical Center if so desired.

- 2) In the future on Attachment A, would you also please indicate which of their permit parameters (or reporting requirements) your industries were in non-compliance with?

Thank you for your timely report remaining in compliance with the Federal Pretreatment Reporting requirements.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625