

Hazardous Waste Certification Statement

Business Name: HOT SPRINGS NATIONAL PARK

Physical Address: 101 RESERVE, HOTSPRINGS, AR 71901

Owner of business: U.S. GOV

- | | <u>YES</u> | <u>NO</u> |
|--|------------|-----------|
| 1) Certify you <u>do not</u> generate hazardous waste as identified under 40 CFR 261, | ___ | ___ |
| 2) Certify you <u>do</u> generate hazardous waste as identified under 40 CFR 261 but either: | | |
| • DO NOT discharge this waste to the City's sewage system, or | ___ | <u>X</u> |
| • DO discharge this hazardous waste to the City's sewage system. | ___ | ___ |

The accompanying certification statement must be signed by a duly authorized representative of your business:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print name and title

ARDY L TACKETT, HOTSPRINGS NATIONAL PARK, SAFETY MANAGER

Signature and date

Ardy L Tackett 2-5-09



City of Hot Springs
Municipal Utilities
Waste Water Treatment Plant

320 Davidson Drive
Hot Springs, Arkansas 71901
(501) 262-1881
(501) 262-0339 Fax

January 30, 2009

Hot Springs National Park
631 Whittington Avenue
Hot Springs, AR 71913

RE: Hazardous Waste Notification Requirement under the National Pretreatment Program

Dear Ardy L. Tackett

Your business has been identified as one that potentially generates Hazardous Waste as defined under the Federal Regulations at **40 CFR 261**.

Under the specific pretreatment requirement in **40 CFR 403.12(p)(1)**, "The Industrial User [non-domestic user] shall notify the POTW [appropriate City wastewater official], the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW [City sewage system] of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261."

Under **40 CFR 403.12(p)(4)**, "In the case of any notification made under paragraph (p) of this section, the Industrial User shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical." The full requirement with exemptions can be found at the following website address: http://edocket.access.gpo.gov/cfr_2003/julqtr/40cfr403.12htm.

Many of you may be unaware of this notification requirement, but it has recently come to our attention through numerous national studies and reports that Hazardous Waste may be generated and disposed of from your business sector into the City's sewage collection system.

At this time, the City is specifically targeting mercury from amalgam, silver from spent film processing wastes and hazardous waste pharmaceuticals.

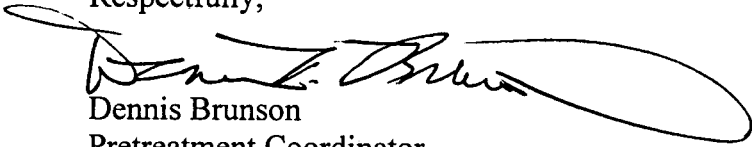
If your facility does not have an amalgam separator, silver recovery unit or a system of properly disposing of Hazardous Waste Pharmaceuticals, you may be discharging Hazardous Waste into the City's sewage collection system and must follow the above cited Pretreatment Requirement.

Please submit required notification within thirty (30) days of the date on this correspondence in writing to the following:

- Dennis Brunson, Hot Springs Utilities 320 Davidson Dr. Hot Springs, AR. 71901
- Troy Hill, US EPA Region 6, 1445 Ross Avenue, Suite 1200, Code: 6PD, Dallas, TX 75202-2733
- Ryan Benefield, ADEQ Hazardous Waste Chief, 5301 North Shore Dr. N. Little Rock, AR. 72218-5317

If no response is received within the thirty (30) day period, your facility may be subject to a site specific inspection

Respectfully,



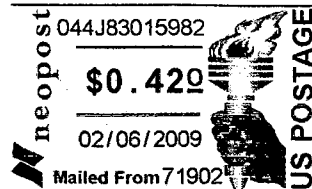
Dennis Brunson
Pretreatment Coordinator

Cc: Steve Mallett Utilities Director
Larry Merriman Utilities Project Manager
Ron Wacaster Facility Operations Manager
Allen Gilliam/ADEQ State Pretreatment Coordinator
5301 North Shore Dr.
North Little Rock, AR 72118

UNITED STATES
DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
HOT SPRINGS NATIONAL PARK
101 Reserve St.
HOT SPRINGS, ARKANSAS 71902

OFFICIAL BUSINESS
PENALTY FOR PRIVATE USE, \$300

AN EQUAL OPPORTUNITY EMPLOYER



Allen Gilliam
ADEQ State Pretreatment Coordinator
5301 North Shore Drive
North Little Rock, AR 72118

