

Peltier, Hannah

From: Gilliam, Allen
Sent: Monday, January 26, 2015 10:45 AM
To: james house
Cc: sheridan david fitzgerald; Fuller, Kim; Peltier, Hannah
Subject: AR0034347_Kohler ARP000021 Jan 2015 semi annual report with corrected ADEQ reply_20150126

James,

I was in a rush last Friday afternoon and was thinking over the weekend what I was asking for in Friday's e-mail. To wit, "Per 40 CFR 403.12(g)(6), "If an Industrial User subject to the reporting requirement in paragraph (e) or (h) of this section monitors any regulated pollutant at the appropriate sampling location more frequently than required by the Control Authority, using the procedures prescribed in paragraph (g)(5) of this section, **the results of this monitoring shall be included in the report.**"

Please submit just your contract lab's results' sheets for the numerous analyticals run for Cr, Cu, Ni and Zn within thirty (30) days from the date on this correspondence. These should cover analyticals reported from July through December '14 as every week's analytical results are not shown, just their "Max" and "Avg".

I realized this would be asking for 6 months X 4 lab analyticals X 3+/- additional lab sheets of paper to be submitted. That would amount to a paperwork overload. My apologies for this oversight although ADEQ could request the actual lab's analyticals at any time.

Please disregard submittal of the lab's results sheets, but on future reports include the actual lab **results** required in 40 CFR 403.12(g)(6). This will mean expanding your table of results for your selected metals and may require another sheet for summarizing all samples analyzed.

It is Kohler's responsibility to keep the lab's analytical data sheets on file for review for three (3) years per, "40 CFR 403.12(o)(1) Any Industrial User or POTW subject to the reporting requirements established in this section (including documentation associated with Best Management Practices) shall be required to retain for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this section) and shall make such records available for inspection and copying by the Director and the Regional Administrator (and POTW in the case of an Industrial User). This period of retention shall be extended during the course of any unresolved litigation regarding the Industrial User or POTW or when requested by the Director or the Regional Administrator...[And]

Per 40 CFR 403.12(o)(2), "*Record-keeping requirements.* (1) Any Industrial User and POTW subject to the reporting requirements established in this section shall maintain records of all information resulting from any monitoring activities required by this section, including documentation associated with Best Management Practices. Such records shall include for all samples:

- (i) The date, exact place, method, and time of sampling and the names of the person or persons taking the samples;
- (ii) The dates analyses were performed;
- (iii) Who performed the analyses;
- (iv) The analytical techniques/methods use; and

(v) The results of such analyses.

If there are further questions or concerns please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

cc: David Fitzgerald, Sheridan Water Works Manager

E/NPDES/NPDES/Pretreatment/Reports

-----Original Message-----

From: Gilliam, Allen

Sent: Friday, January 23, 2015 3:41 PM

To: james house

Cc: Fuller, Kim; Peltier, Hannah; sheridan david fitzgerald

Subject: AR0034347_Kohler ARP000021 Jan 2015 semi annual report with ADEQ reply_20150123

James,

Kohler's January 2015 semi-annual Pretreatment report was received, reviewed, deemed complete, but not compliant with the Federal Pretreatment reporting requirements in 40 CFR 403.12(g). The analytical results showed compliance with the Metal Finishing standards in 40 CFR 433.17.

As per our phone conversation on 1/23/15, the page showing "weekly Avgs" and "Maxs" (for selected metals) will be noted, "for Kohler's internal QA/QC, but are analyzed by an ADEQ certified lab" using EPA approved 40 CFR 136 methods.

Per 40 CFR 403.12(g)(6), "If an Industrial User subject to the reporting requirement in paragraph (e) or (h) of this section monitors any regulated pollutant at the appropriate sampling location more frequently than required by the Control Authority, using the procedures prescribed in paragraph (g)(5) of this section, the results of this monitoring shall be included in the report."

Please submit just your contract lab's results' sheets for the numerous analyticals run for Cr, Cu, Ni and Zn within thirty (30) days from the date on this correspondence. These should cover analyticals reported from July through December '14 as every week's analytical results are not shown, just their "Max" and "Avg".

Also per our phone conversation, let's please leave out extraneous material in future reports:

- 1) Monthly flow reports (4 pages w/spreadsheets) for the six month period are not necessary as there is a "box" on ADEQ's standardized semi-annual report for values to be reported for both the Maximum and Avg flows during the reporting period; and
- 2) Sheridan's copies of Kohler's water usage records (5 pages) are not necessary.

The above compilations can be saved in your files as deemed necessary.

Thank you for your attention to the above issue and comments.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: David Fitzgerald, Sheridan Water Works Manager

E/NPDES/NPDES/Pretreatment/Reports