

## Gilliam, Allen

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**From:** Gilliam, Allen  
**Sent:** Tuesday, November 30, 2010 1:03 PM  
**To:** 'dgombrich@parker.com'  
**Cc:** Fuller, Kim; Torrence, Rufus; benton terry mcclennahan  
**Subject:** AR0036498\_Parker Mobile (ARP001049) November 2010 Semi-Annual Pretreatment Report Reply\_20101130

Mr. Gombrich,

Mr. Torrence should be back in the office after the first of the year. I have been temporarily assigned to respond to his Pretreatment industry reports until that time.

Your semi-annual report was received on 11/16/10, reviewed, deemed complete and compliant with the National Pretreatment Regulations in 40 CFR 403. No further action is required.

One caveat to add: Since you've stated and certified the phosphatizing process "did not operate during this [past 6 month] period", this office's opinion of the wastewater you have discharged is not subject to the metal finishing standards in 40 CFR 433. Although your Zn results showed 5.1 mg/l, you have not violated the metal finishing regulations located in 40 CFR 433 because there were no "core operations performed". The wastewater cannot be claimed as an ancillary stream in 40 CFR 433.10(a) in this case.

As discussed via the phone call last week, it is possible your elevated Zn was from the galvanized piping used to convey the rinse waters (after application of the "Simple Green") from your washout tank/sump.

With the reported average volume of 411 gpd discharge, this converts to 0.0175 lbs/day (0.28 ounces/day) discharged to the City's sewer system.

Thank you for your cooperation and timely reports remaining compliant with the Federal Pretreatment Regulations.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Terry McClennahan/City of Benton/Wastewater Manager