

# ADEQ

ARKANSAS  
Department of Environmental Quality

April 16, 2019

Charles Blanton, Corporate Director of Environmental Health and Safety  
Mueller Copper Tube Products, Inc.  
8285 Tournament Drive, Suite 150  
Memphis, Tennessee 38125

RE: Notice of Termination, Stormwater Industrial Permit, Mueller Copper Tube Products, Inc. (Permit Tracking No. **ARR00A658**, AFIN **19-00004**)

Dear Mr. Blanton:

This letter is written in response to your Notice of Termination sent to ADEQ on January 22, 2019, requesting to terminate the coverage under the General Permit ARR000000 with tracking number **ARR00A658** located at 1525 North Falls Blvd, Wynne, Arkansas 72396. After a review of the information you provided, the Department has determined that Mueller Copper Tube Products, Inc. (Mueller) should maintain coverage under the General Permit ARR000000.

Although Mueller has ceased industrial activity that falls under Industrial Sector F3, Mueller is still conducting industrial activity that falls under the Industrial Sector K1. Industrial activity under Industrial Sector K1 represents hazardous waste treatment, storage, or disposal facilities, including those that are operating under interim status or a permit under subtitle C of RCRA. Mueller is currently under ADEQ CAO LIS 08-136-001 and will continue to operate its remediation system to remove trichloroethylene from the groundwater. It is our understanding that hazardous waste generated from the remediation system operation will continue on site. If Mueller can satisfy criteria of no exposure and complete the No Exposure Exclusion Certification Form, Mueller may qualify for the No Exposure Exclusion. To obtain coverage under the No Exposure Exclusion, submit the No Exposure Exclusion Certification Form ([https://www.adeq.state.ar.us/water/permits/npdes/stormwater/pdfs/industrial/arr000000\\_no\\_exposure\\_certification\\_form.pdf](https://www.adeq.state.ar.us/water/permits/npdes/stormwater/pdfs/industrial/arr000000_no_exposure_certification_form.pdf)) to the Department.

If you have any questions concerning this matter or need additional information, please feel free to contact Kai Imamura of my staff at (501) 682-0045.

Sincerely,



Bryan Leamons, P.E.  
Senior Operations Manager  
Office of Water Quality

BL:ki

cc: Electronic Files (ARR00A658)

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE 501-682-0744 / FAX 501-682-0880

[www.adeq.state.ar.us](http://www.adeq.state.ar.us)