From:	Scott Lancaster <scott.lancaster@badboymowers.com>
Sent:	Tuesday, October 23, 2012 11:11 AM
To:	Gilliam, Allen; randall.davis@badboymowers.com
Cc:	wwsuper@cityofbatesville.com; Waller, Scott
Subject:	RE: AR0020702_Bad Boy ARP001027 Oct 2012 Revised BMR reply_20121018 AFIN 32-00530

Allen, I'm not sure we're on the same page and wanted to clarify if needed. The 9-28-12 correspondence was not intended to replace our original BMR for our current system, but was intended to serve as the initial BMR for our new system that will go on line in January in our new facility and will operate as a second powder coat paint system. We were also advising you in Eugene's call that changes had been made to our current system in that stages 1,3, & 5 will no longer be discharged, but will be picked up by a waste disposal company for the reasons we discussed. That will also be the case with our new system.   I apologize if we confused this or did not make it clear in either our conversation or our report. Let me know what we need to do to clarify this, if anything. Thanks, SJL

From: Gilliam, Allen [mailto:GILLIAM@adeq.state.ar.us]
Sent: Thursday, October 18, 2012 9:35 AM
To: randall.davis@badboymowers.com; scott.lancaster@badboymowers.com
Cc: wwsuper@cityofbatesville.com; Waller, Scott
Subject: AR0020702_Bad Boy ARP001027 Oct 2012 Revised BMR reply_20121018 AFIN 32-00530

Randel et. al,

Your September 28, 2012 correspondence was received on October 2nd, reviewed and will replace your initially approved baseline monitoring report (BMR - a one-time report).

We have established your semi-annual reports would be due during the months of June and December of each year.

Unless the City requires more frequent sampling and reporting, June and December will remain as your two (2) reporting months to comply with the minimum reporting requirements in 40 CFR 403.12(e).

Until an adequate toxic organic management plan (TOMP) is submitted/approved by ADEQ, Bad Boy must still test for the toxic organics (TTO) located in 40 CFR 433.11 and report the results on the semi-annual reports.

Since the results you provided with this report was a copy of the one originally submitted back in June of this year: 1) another toxic organic scan must be submitted by December 2012; or 2) an adequate TOMP is submitted and approved by ADEQ to satisfy 40 CFR 433.12(a), "In lieu of requiring monitoring for TTO, [ADEQ] may allow [Bad Boy] to make the following certification statement: "Based on my inquiry of the person or persons directly responsible for managing compliance with the…pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to [ADEQ]." For indirect dischargers, the statement is to be included as a comment to the periodic reports required by 40 CFR 403.12(e)..."

Via our phone conversations on or about 9/27/12, it is understood your "working" tanks 1, 3 and 5 will be hauled off-site with only the rinse tanks 2 and 4 being discharged to the City. Please continue denoting this on the attached shorter "semi-annual report" form (save blank to file and re-name after each use saving original blank for future use).

The regulated flow schematic page should be revised to reflect the batch discharges from tanks 1, 3 and 5 are hauled off-site. Please submit the revised schematic page separately as a PDF attachment to an e-mail to this office.

Future semi-annual reports may be e-mailed to this office (including the contract lab's results and Chain of Custody) as long as signatory authority signatures are legible.

Thank you for your cooperation in coming into compliance with the Federal Pretreatment Program.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports

ec: Eugene Townsley/Batesville Wastewater Manager