

From: [Gilliam, Allen](#)
To: [Randel, Davis](#)
Cc: [batesville eugene townsley](#); [batesville mike mcdaniels](#); [Blevins, Terri](#)
Subject: AR0020702_Bad Boy 1 ARP001027 Dec 2012 semi annual Pretreatment report addendum reply_20130110
Date: Thursday, January 10, 2013 7:23:47 AM

Randel,

The remaining portion of your December 2012 semi-annual Pretreatment Report was received on 1/7/13. Your semi-annual report is complete and compliant with the Federal Pretreatment Requirements in 40 CFR 403 and more specifically the Metal Finishing limitations in 40 CFR 433.17.

In the future only the contract lab's analytical results are necessary for a complete report. Their QA/QC sheets are not needed by this office (these are for your use/observation that the lab has correctly validated their results). Those additional sheets may have been the cause of your report exceeding this office's maximum e-mail receipt of 10 MB.

Notes:

- 1) The chains of custody (Cs of C) submitted were not complete. The Cs of C have to have sampler's name (or initials) as the first person to place in the "relinquished by" box. The first person (signature) who relinquished them to UPS did not match with the sampler's initials of "BET" in the most complete C of C. The two Cs of C were not complete; subsequently, the results associated with those Cs of C may not be admissible in a court of law. You may want to converse with Eugene Townsley or Mike McDaniel to rectify this issue;
- 2) The only parameters you need to sample for are those which are regulated under the Metal Finishing standards in 40 CFR 433 unless the City has required you to sample for additional ones. This office noticed you also had the lab analyze for As, Se and Hg. These are not required under 40 CFR 433. Has the City requested you sample for these additional pollutants?
- 3) The statement made by Arkansas Testing Labs, "Your TTO is: <10 ug/l" is not correct as some on the TTO analysis were <20 ug/l and <50 ug/l. It is advisable to submit an approvable toxic organic management plan (TOMP) as soon as possible to forgo future analysis of this entire and expensive toxic organic list required in 40 CFR 433.11. This office has provided you with the EPA guidance for developing a TOMP.

If you have any questions or comments please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Eugene Townsley, Batesville Water Utilities Superintendent
Mike McDaniel, Batesville Pretreatment Coordinator