

## Peltier, Hannah

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**From:** Gilliam, Allen  
**Sent:** Tuesday, April 02, 2013 11:04 AM  
**To:** Randel Davis  
**Cc:** Fuller, Kim; Peltier, Hannah; batesville eugene townsley; batesville mike mcdaniels  
**Subject:** AR0020702\_Bad Boy 2 ARP001028 March 2013 90 day compliance report reply\_20130402

Randel,

Your 90 day "report on compliance with categorical pretreatment standard deadline" was received on 3/29/13, reviewed, deemed complete and compliant with that reporting requirement in 40 CFR 403.12(d). Please notify this office the day of your first discharge to the City's sewage collection system.

It is recognized your toxic organics were below the contract lab's method detection levels. Per 40 CFR 433.12, "(a) In lieu of requiring monitoring for TTO, [ADEQ] may allow dischargers to make the following certification statement: "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation...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 [TOMP] submitted to [ADEQ and the City.]...For indirect dischargers, the statement is to be included as a comment to the periodic reports required by 40 CFR 403.12(e). If monitoring is necessary to measure compliance with the TTO standard, the industrial discharger need analyze for only those pollutants which would reasonably be expected to be present.

(b) In requesting the certification alternative, a discharger shall submit a solvent management plan [TOMP] that specifies to the satisfaction of [ADEQ] the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater."

It is hoped you can complete and submit an approvable TOMP to this office and the City before your next reporting month.

Since you've supplied this office with both Bad Boy facilities' analyticals this month, please change your semi-annual reporting months to March and September of each year. These will be due to this office (.pdf attached to an e-mail acceptable) and the City during those two (2) months.

Thank you for your timely report.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Eugene Townsley, Batesville Wastewater Superintendent

Mike McDaniels, Batesville Pretreatment Coordinator