

## Henderson, Katie

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**From:** Gilliam, Allen  
**Sent:** Tuesday, July 03, 2012 9:18 AM  
**To:** Randel Davis  
**Cc:** Rhonda Sharp; scott.lancaster@badboymowers.com; bateseville eugene townsley; Fuller, Kim; Henderson, Katie  
**Subject:** AR0020702\_Bad Boy ARP001027 Baseline Monitoring Report and Semi Annual Pretreatment Report Reply\_20120628  
**Attachments:** Chain of Custodies.xls

Randel,

Based on last week's phone conversations regarding regulated flows and corrections made thereto, Bad Boy Inc.'s (BBI) baseline monitoring report (BMR) was received (6/26/12), reviewed, deemed complete and compliant with the Federal Pretreatment Requirements in 40 CFR 403.12(b) with the understanding a Cyanide analysis from a representative sample of your wastewater from your regulated processes will soon follow.

Since BBI's BMR was due "...90 days prior to commencement of discharge [to the City]..." [per 40 CFR 403.12(b)] and your BMR indicated BBI first discharged to the City on 2/1/07, the semi-annual report attached to your BMR will constitute your first semi-annual report. Pending the receipt of your Cyanide sample results, this office will deem this report complete and compliant with the Metal Finishing limitations in 40 CFR 433.17 (Pretreatment Standards for New Sources).

Your semi-annual Pretreatment Reports to ADEQ per 40 CFR 403.12(e) will be due during the months of June and December of each year. You've indicated stages (tanks) #1, #3 and #5 are batch discharged twice/year. Please include the analytical test results of those tanks' wastewater also during June and December. Until an approvable toxic organic management plan (TOMP) is submitted and approved by ADEQ, the entire list of toxic organics (per 40 CFR 433.11) will have to be analyzed for and submitted.

The semi-annual reports may sent electronically to this office as long as signatures and dates are legible.

Also find attached ADEQ's chain of custody which may help your contract lab to revise theirs to be more complete.

Other Pretreatment Reporting requirements under 40 CFR 403.12 include:

- If an Industrial User monitors any regulated pollutant at the appropriate sampling location more frequently than required by ADEQ (or the City), the results of this monitoring shall be included in the report;
- Notices of potential problems including slug loadings. Notification due to ADEQ AND the appropriate City Wastewater Official immediately upon identification of discharges, including slug loadings that could cause problems to the POTW (City's wastewater treatment plant and/or collection system);

- Notice of changed discharge. Notification due to ADEQ from categorical users in advance of any significant change in volume or character of pollutants discharged;
- Notice of violation and resampling. Notification due to the ADEQ within 24 hours of noting a violation; results of resampling due within 30 days;
- Notification of hazardous waste discharge. Notification to the POTW (appropriate City Wastewater Official), EPA, and ADEQ Hazardous Waste authorities of the hazardous wastes discharges to the POTW; and
- All Pretreatment monitoring records and correspondence must be kept on file for a minimum of three (3) years.

Thank you for your expedience coming into compliance the Federal Pretreatment Regulations.

If there are any further questions please feel free to contact this office.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Eugene Townsley/Wastewater Utility Superintendent/Batesville Water Utilities

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**From:** Rhonda Sharp [<mailto:rhonda.sharp@badboymowers.com>]  
**Sent:** Tuesday, June 26, 2012 12:38 PM  
**To:** Gilliam, Allen  
**Subject:** ADEQ Baseline Monitoring Report and Semi-Annual Report

Good afternoon Mr. Gilliam.

I hope this will work for you. Thanks for your help.

***Rhonda Sharp***  
***Assistant to Scott Lancaster, General Counsel***  
870-698-0090 Fax: 870-307-6787  
[rhonda.sharp@badboymowers.com](mailto:rhonda.sharp@badboymowers.com)  
Bad Boy Mowers, Inc.





