

Waller, Scott

From: Gilliam, Allen
Sent: Wednesday, October 24, 2012 4:19 PM
To: randel.davis@badboymowers.com; scott.lancaster@badboymowers.com
Cc: batesville eugene townsley; Waller, Scott
Subject: AR0020702_Bad Boy ARP001027 Oct 2012 2nd BMR or notification of changed discharge reply_20121024 AFIN 32-00530

Scott,

My apologies for not noticing your only mention of "...our new powder coat paint system which will begin ops in early January of 2013." on your cover letter and the estimated discharge date of 1/1/13 from (I'm assuming) your ATV line. A comprehensive process narrative should have been included from raw material in to end product out.

I only recognized the same "...five stage cleaning process prior to powder coat" and the same analyticals sent with the initial baseline monitoring report (BMR) and a change in dates on which the latest (BMR) was signed. The analyticals were the same as well as the one (1) schematic, chemicals used and the somewhat vague "Comprehensive Narrative Description of the facility's wastewater activities/processes...".

At any rate this change in regulated wastewater disposal practices and the addition of another process (the ATV line) should have been submitted as a "*Notification of changed Discharge*. [Bad Boy] shall promptly notify [ADEQ and Batesville] in advance of any substantial change in the volume or character of pollutants in their Discharge" per 40 CFR 403.12(j). Another BMR was not necessary.

I will retain the 6/26/12 BMR (for the mowers) and include the 2nd "BMR" in lieu of a "*Notification of changed Discharge*" for your ATV line.

If you are to have two 5 stage phosphatizing lines with the "work" tanks (1, 3 and 5) being hauled off-site for disposal, schematics should be re-submitted for your file to be most complete. These schematics should also indicate where representative samples will be taken for each line (are sample bottles simply "scooped" into the sump, held under a discharge pipe or ???). Wastewater sent off-site for disposal should be indicated on those schematics. The ones I currently have on file show all tanks' wastewater discharging to a "sump pump/sample pit".

The mower line's wastewater sampling point is described as, "...at the sampling port located at the sump" while for the proposed ATV line's wastewater sampling point is confusing as it states, "Samples for stages 2 and 4 are taken at the sample port located at the sump. Samples located just outside the building near the tank." Please clarify.

Do we need two different schematics for the two (2) phosphatizing lines and their sampling points? Or, will there still be just one (1) phosphatizing line with a higher flow rate? Will there be just one sampling point for both wastewater discharges?

Please call with any clarifications or further comments.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Eugene Townsley/Batesville Water Utilities Superintendent

From: Scott Lancaster [<mailto: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