

## Waller, Scott

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**From:** Gilliam, Allen  
**Sent:** Friday, November 09, 2012 11:24 AM  
**To:** Randel Davis  
**Cc:** Fuller, Kim; Waller, Scott  
**Subject:** AR0020702\_Bad Boy facilities 1 and 2 ARP001027 ARP001028 sampling points\_20121108

Thanks Randel,

It is most important to know exactly where your sampling points are. I'll revise BB #2's sampling point to the outside on the last revision you sent me.

If an EPA inspector was to show up un-announced wanting to take samples and you weren't there, how would he know where you've been taking samples so he could sample at the same place?

What I see on BB's #2 schematic is a circle over a pipe coming from the holding tank and/or the inside of the bldg. Is that "sampling port" (what are you describing as a "port"?) a clean-out pipe, a separate "T" with a valve on it or is it another sump with a pipe discharging into it and then flowing to the City?

What are your sampling techniques? Just holding the sample bottles under the wastewater level in the sump; holding the sample bottles under a discharge pipe or at a "T" after a valve is opened? This is a question that will be asked during your first compliance assurance visit (w/sampling) by ADEQ in the near future.

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

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**From:** Randel Davis [<mailto:randel.davis@badboymowers.com>]  
**Sent:** Friday, November 09, 2012 11:00 AM  
**To:** Gilliam, Allen  
**Subject:** RE: AR0020702\_Bad Boy facilities 1 and 2 ARP001027 ARP001028 updated schematics reply\_20121108

Allen

BadBoy #1 sample port is at the sump. BadBoy #2 to make it easy the port is outside.

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**From:** Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]  
**Sent:** Thursday, November 08, 2012 10:18 AM  
**To:** [randel.davis@badboymowers.com](mailto:randel.davis@badboymowers.com)  
**Cc:** batesville eugene townsley; [wwinspector@cityofbatesville.com](mailto:wwinspector@cityofbatesville.com); Waller, Scott; Fuller, Kim  
**Subject:** AR0020702\_Bad Boy facilities 1 and 2 ARP001027 ARP001028 updated schematics reply\_20121108

Randel,

Thank you for the updated schematics and tank volumes for your 2 facilities. These will replace the ones sent in with your two initial baseline monitoring reports.

The footnotes included on your schematics helps explain to any interested party that your “work tanks” 1, 3 and 5 are hauled off-site for disposal separately from the rinse tanks 2 and 4 which are discharged to the City.

Both schematics show two separate sampling points. It is stated in your two baseline monitoring reports sampling for compliance of the rinse waters will be taken from the sumps inside the plants. If that is not correct, please advise. It is important to know the correct sampling point for compliance with the Federal Metal Finishing limitations in 40 CFR 433.17.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Eugene Townsley/Batesville Water Utilities Superintendent  
Mike McDaniels/Batesville Wastewater Inspector