

Henderson, Katie

From: Gilliam, Allen
Sent: Friday, May 15, 2009 2:43 PM
To: 'Kevin Campbell'
Cc: Henderson, Katie
Subject: EZ-Loader (ARP001055) semi-annual reports

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433 report
form.doc (113 KB)

Kevin,

It was good talking to you today.

Find attached the semi-annual report form developed for our state's metal finishers (see http://www.access.gpo.gov/nara/cfr/waisidx_06/40cfr433_06.html specifically CFR 433.17) for your federally regulated limitations. Please locate an Arkansas certified lab as soon as you can for sampling the discharge from your Fe phosphatizing/rinse line. No other dilution streams (boiler blowdown, sanitary nor non-contact cooling water) shall be mixed with this regulated wastewater.

CFR 433.11 lists the total toxic organics you must also test for if you haven't submitted a toxic organic management plan (TOMP). See http://www.ci.austin.tx.us/water/downloads/wwwssd_iw_tompguidance.pdf for EPA's guidance for developing such a plan. Once this plan is submitted and approved, you may make the certification in 40 CFR 433.12(a).

The below is the pretreatment regulation requiring semi-annual reports which EZ-Loader has failed to submit.

"40 CFR 403.12(e) Periodic reports on continued compliance. (1) Any Industrial User subject to a categorical Pretreatment Standard (except a Non-Significant Categorical User as defined in §403.3(v)(2)), after the compliance date of such Pretreatment Standard, or, in the case of a New Source, after commencement of the discharge into the POTW, shall submit to the Control Authority during the months of June and December, unless required more frequently in the Pretreatment Standard or by the Control Authority or the Approval Authority, a report indicating the nature and concentration of pollutants in the effluent which are limited by such categorical Pretreatment Standards. In addition, this report shall include a record of measured or estimated average and maximum daily flows for the reporting period for the Discharge reported in paragraph (b)(4) of this section except that the Control Authority may require more detailed reporting of flows. In cases where the Pretreatment Standard requires compliance with a Best Management Practice (or pollution prevention alternative), the User shall submit documentation required by the Control Authority or the Pretreatment Standard necessary to determine the compliance status of the User. At the discretion of the Control Authority and in consideration of such factors as local high or low flow rates, holidays, budget cycles, etc., the Control Authority may modify the months during which the above reports are to be submitted."

Will June and December be acceptable for you to submit these reports? This will get EZ-Loader "back on track" with its reporting requirements.

Please call with any questions,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

Ccc: Katie Henderson (for entry into "Pretreatment Reports" on E-drive)