

Henderson, Katie

From: Gilliam, Allen
Sent: Wednesday, July 25, 2012 11:44 AM
To: Kevin Campbell (KCampbell@ezloader.com)
Cc: 'mt. home alma clark'; Fuller, Kim; Henderson, Katie
Subject: AR0021211_EZ Loader ARP001055 Revised June 2012 Semi-Annual Pretreatment Report Showing SNC and Revised TOMP reply_20120724 AFIN 0300070

Kevin,

Your revised June 2012 semi-annual Pretreatment Report was received and reviewed.

Since December of last year we've had many phone conversations and e-messages discussing your zinc excursions of the Federal Metal Finishing zinc limitations in 40 CFR 433.17. This office appreciates the work you've put into your corrective action plan to alleviate the zinc violations.

Thank you for the synopsis of analyticals (Section 8 of the semi-annual report) taken over the last six (6) months beginning in December 2011.

From 12/7/11 until 2/6/12 (3 months), your zinc levels were in violation of the Metal Finishing "Monthly Average Not to Exceed" and the "Maximum for any 1 day" limitations.

From 3/14/12 until 5/31/12 (3 months), analytical results of your wastewater showed compliance with the federal limitations.

Under 40 CFR 403.8(f)(2)(viii), "[EZ Loader] is in significant noncompliance [SNC] if its violation meets one or more of the following criteria:

...(B) Technical Review Criteria (TRC) violations, defined here as those in which 33 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including instantaneous limits, as defined by 40 CFR 403.3(l) multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other pollutants except pH);..."

EZ Loader met this criteria by exceeding the TRC values 50 percent of the 6-month time period from December 2011 to May 2012.

The corrective actions you have taken to alleviate the zinc excursions during the last three (3) months of your semi-annual reporting period has brought EZ Loader back into compliance. There are no further actions deemed necessary at this time.

If you have any questions or concerns please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Alma Clark, City of Mountain Home, Director of Water and Sewer Services

From: Kevin Campbell [<mailto:KCampbell@ezloader.com>]

Sent: Monday, July 23, 2012 2:17 PM

To: Gilliam, Allen

Subject: FW: EZ Loader Revised June 2012 semi-annual Pretreatment Report / Revised TOMP

Allen,

Here is the form with revisions, let me know what you think please.

Kevin Campbell
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<<Semi annual water report form June 2012.doc>> <<Updated TOMP June 2012.pdf>>