

Gage, Hannah

From: Gilliam, Allen
Sent: Tuesday, November 01, 2016 8:23 AM
To: 'Alma L. Clark'; 'ipc@centurtel.net'; Ramsey, David
Cc: Gage, Hannah; Leamons, Bryan; McWilliams, Carrie
Subject: AR0021211_Industrial Powder Coating ARP001056 newly identified Metal Finisher but non significant categorical industrial user_20161101

Thanks Alma and Harold,

Industrial Powder Coating (IPC) is a Metal Finisher regulated under the Federal Pretreatment standards in 40 CFR 433.17 (new source). Conversion coating using phosphoric acid (identified on MSDS [not attached]) prior to powder coating is one of the 6 core operations under 40 CFR 433. It does not matter how much product they use per yr or day; it's the amount of regulated wastewater IPC discharges to your system daily.

After phone conversations with IPC's owner on 8/18, Harold DePriest, he did indicate any type of regulated fluid usage (from phosphatizing to rinsing) was by use of a small pressure wash spray. He also indicated he could measure how much of that total daily wastewater was being discharged using a 5 gallon bucket.

IPC is required to take a representative sample of their regulated wastewater and have it analyzed by an Arkansas certified lab for the metals and cyanide in 40 CFR 433.17 (see http://www.ecfr.gov/cgi-bin/text-idx?SID=56e4d3b25f99b1159453230de81a4d18&mc=true&node=pt40.32.433&rgn=div5#se40.32.433_117).

Please ensure your sample container is sterile, not made of metal and free of any contaminants. Ms. Clark should be able to provide you sage advice regarding sampling procedures. Submittal of the analysis of these metals will help satisfy "(i)" below.

Under 40 CFR 403.3(v)(2), "[ADEQ] may determine that an Industrial User subject to categorical Pretreatment Standards under §403.6 and 40 CFR chapter I, subchapter N is a Non-Significant Categorical Industrial User rather than a Significant Industrial User on a finding that the Industrial User never discharges more than 100 gallons per day (gpd) of total categorical wastewater (excluding sanitary, non-contact cooling and boiler blowdown wastewater, unless specifically included in the Pretreatment Standard) and the following conditions are met:

- (i) The Industrial User, prior to [ADEQ's] finding, has consistently complied with all applicable categorical Pretreatment Standards and Requirements;
- (ii) The Industrial User annually submits the certification statement required in §403.12(q) together with any additional information necessary to support the certification statement; and
- (iii) The Industrial User never discharges any untreated concentrated wastewater."

If it's the case IPC's regulated wastewater discharge is less than 100 gallons/day, 40 CFR 403.12(q) states, "Annual certification by Non-Significant Categorical Industrial Users. A facility determined to be a Non-Significant Categorical Industrial User pursuant to §403.3(v)(2) must annually submit the following certification statement, signed in accordance with the signatory requirements in paragraph (l) of this section. This certification must accompany any alternative report required by [ADEQ]:

Based on my inquiry of the person or persons directly responsible for managing compliance with the categorical Pretreatment Standards under 40 CFR 433, I certify that, to the best of my knowledge and belief

that during the period from [for this report: from the 1st volume and analysis submittal date], to December 31, 2017 (continuing this certification into future years "from January 1, 2017 to December 31st, 2017, etc.):

(a) The facility described as _____ [facility name] met the definition of a non-significant categorical Industrial User as described in §403.3(v)(2); (b) the facility complied with all applicable Pretreatment Standards and requirements during this reporting period; and (c) the facility never discharged more than 100 gallons of total categorical wastewater on any given day during this reporting period. This compliance certification is based upon the following information: _____

IPC's authorized representative must also annually submit the below certification statement (during the month of January): I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name: _____ Signature: _____
_____ Title: _____ Date: _____

Apologies for not sending this out sooner.

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

From: Alma L. Clark [mailto:aclark@cityofmountainhome.com]
Sent: Monday, August 22, 2016 4:07 PM
To: Gilliam, Allen
Subject: copy of bmr and msds for IPC

Allen,

He did not sign this..... he says he only uses 100gal or less a year of the attached msds....does mostly sand blasting.... And the water usage that I sent....this guy we think has a toilet problem or water heater leaking because he has 24 hour a day usage and the don't operate 24/7 so the water usage is probably not representative of his actual process usage.... He is checking to see where his problem with usage is..? suppost to get back with us.... But here this is for now...

**ALMA L. CLARK
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