

Gage, Hannah

From: Gilliam, Allen
Sent: Thursday, August 25, 2016 3:51 PM
To: 'ipc@centurytel.net'
Cc: Leamons, Bryan; 'mt. home alma clark'; Gage, Hannah
Subject: AR0021211_Industrial Powder Coating ARP001056 newly identified Metal Finisher but non significant categorical industrial user?_20160825

Harold,

If you attached a letter, I didn't receive it.

It's important you submit a comprehensive narrative description of your processes, especially the phosphatizing and powder coating operation. This should be fairly simple to accomplish as you indicated via our 8/18 phone conversation there were very few steps from new (steel? Aluminum?) material that was actually being phosphatized, rinsed(?) or heat dried(?), then polarized for powder coating. A simple walk through of that process describing each step should not be that difficult.

Definitely begin measuring the amount of regulated wastewater in a five gallon bucket and report to this office how much is used on a day's basis even if this small procedure is only done once a month.

A sample/analysis of your (regulated only, no sanitary or non-contact cooling water, boiler blowdown, condensate, etc.) wastewater and its verifiable flow is necessary to help in determining if IPC is a Non-Significant Categorical Industry (NSCIU) under 40 CFR 403.3(v)(2) located @ http://www.ecfr.gov/cgi-bin/text-idx?SID=08936e2fc4117faca8bd1df6b7523eed&mc=true&node=pt40.31.403&rgn=div5#se40.31.403_13.

Alma would be an invaluable source of information on your sampling procedures as your samples should not be captured in any type of metal container. If you choose to purchase a plastic 5 gallon bucket, this may be all that is needed to take a 250 mL sample out of. Alma may also be able to direct you to a certified lab who would analyze your two 250 mL plastic sample bottles (preservative added by lab) for Cadmium, Chromium, Copper, Lead, Nickel, Silver, Zinc and Cyanide (different preservative than for the metals).

If there are further questions, please feel free to contact this office,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

From: ipc@centurytel.net [<mailto:ipc@centurytel.net>]
Sent: Thursday, August 25, 2016 3:14 PM
To: Gilliam, Allen
Subject: Excess water usage by Industrial Powder coating in Mountain Home Arkansas

Allen if this letter needs further explaining feel free to call or E-mail me

Thank you Harold D DePriest