

Gage, Hannah

From: Gilliam, Allen
Sent: Tuesday, December 13, 2016 12:05 PM
To: 'ipc@centurytel.net'
Cc: Ramsey, David; Yates, Adam; Gage, Hannah; 'mt. home alma clark'; Healey, Richard
Subject: AR0021211_Industrial Powder Coating ARP001056 newly identified Metal Finisher but non significant categorical industrial user_20161213
Attachments: BMR General Form 2016.doc

Harold,

To date this office has not received any further correspondence from Industrial Powder Coating other than a wastewater analysis. Please submit the required Baseline Monitoring Report (attached) to your fullest knowledge signing the certification statement(s) per the Federal Pretreatment Regulations in 40 CFR 403.12(b).

Industrial Metal Finishing is currently in significant non-compliance (SNC) with the Federal Pretreatment requirements.

Most importantly, record your daily flow (at least when phosphate washing/rinsing), describe how it was arrived at and certify to its accuracy.

Please feel free to contact this office with any questions.

This office is trying to wrap up some loose ends before I leave this agency.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Alma Clark, Mountain Home, Director of Water/Sewer
Richard Healey, NPDES Enforcement Branch Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Gilliam, Allen
Sent: Tuesday, November 01, 2016 2:33 PM
To: ipc@centurytel.net
Cc: Ramsey, David
Subject: FW: AR0021211_Industrial Powder Coating ARP001056 newly identified Metal Finisher but non significant categorical industrial user_20161101

Sorry Harold, I mistyped your email address.

Call with any questions. You need to fill out that baseline monitoring report as completely as possible, submit it and get the phosphate/rinse wastewater analyzed/submitted including your estimated daily flow.

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

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
DIRECTOR WATER/SEWER
CITY OF MOUNTAIN HOME
752 N. COLLEGE ST.
MOUNTAIN HOME, AR 72653
PHONE: 870-425-5115
FAX: 870-425-4828**

ADEQ BASELINE MONITORING REPORT [BMR]
For Categorical Indirect Dischargers

Instructions: In accordance with **40 CFR 403.12(b)** Industrial Users subject to categorical Pretreatment Standards are required to submit to ADEQ a report which contains the information in paragraphs **(b)(1)-(7)**. The User is responsible for submitting a complete and accurate report. The User must complete this form in as much detail as possible. Include additional information on attached sheets as necessary where space is limited.

(1) Facility Identifying Information [**§403.12(b)(1)**]:

A. Legal Name: _____
Mailing Address: _____
_____ Zip: _____

B. Facility Name: _____
Location: _____
_____ Zip: _____

C. Name of Owners: _____
Address: _____

D. Name of Pretreatment System Operators: _____ Class: _____
_____ Class: _____
_____ Class: _____

E. Facility Signatory Authority / Title: _____ / _____

F. Main wastewater compliance contact / Title: _____ / _____
Phone number: _____ Cell #: _____
e-mail address: _____

G. Number of Employees: _____ Number of Shifts: _____

H. Number of Months per Calendar Year which Plant normally operates: _____

I. Name of the City [Publicly Owned Treatment Works (POTW)] that receives the wastewater discharges from this facility. If this facility has other wastewater not connected to a sewerage system describe where that wastewater is discharged):

J. Provide the date the facility began discharging regulated wastewater to the POTW: _____

Date facility installed/commenced construction of the Categorical operation(s): _____

(4) Flow Measurement [**§403.12(b)(4)**]:

A. Total Plant Flow in Gallons per Day (gpd)²:

Average _____ Maximum _____

{denote all the flows below if measured [M] or estimated [E]}

B. Individual Flows in Gallons per Day ¹ (gpd); <u>Dilute</u> wastestreams include non-contact cooling water, sanitary waste, boiler blowdown, etc.	Average Flow Rate ² (gpd)	Max. Flow Rate (gpd)	Type Discharge ² and at what frequency (describe)	Discharged to City, hauled off-site or recycled (describe)
Regulated Streams				
Unregulated Streams [see 40 CFR 403.6(e) @ http://www.ecfr.gov/cgi-bin/text-idx?SID=0f36984670ed5031c47cebf197ae2c4c&mc=true&node=pt40.31.403&rgn=div5#se40.31.403_16 for definition]				
<u>Dilute Wastewater</u> ³				
Non-Contact Cooling Water				
Boiler Blowdown				
Sanitary Wastewater				
De-I or R/O backwash				
Other non-regulated				

¹Referring to 40 CFR403.6(e)(1) average flows must be for a 30-day period unless batch discharges are less frequent than monthly.

²Denote Continuous (C) or Batch (B). If batch discharged, do not normalize over a period of days; state measured amount per batch and at what frequency (monthly, once per 3 months, once per yr, etc.).

³Denote whether any of these wastestreams are combined with the regulated wastestream prior to pretreatment OR prior to the final sampling point. If any of these flows are combined with the regulated wastestream as alluded to above, the values in Section (5)A. below will have to be calculated using the combined wastestream formula in 40 CFR 403.6 @ http://www.ecfr.gov/cgi-bin/text-idx?SID=4f70b0c42294ae99b03bece63132006e&mc=true&node=pt40.31.403&rgn=div5#se40.31.403_16 .

(5) Measurement of Pollutants in User's Discharge to POTW [§ 403.12(b)(5)]:

A. Regulated Flows: The industrial user must perform sampling and analysis of the effluent from all regulated processes which discharge into the POTW (after pretreatment). Provide the analytical data for the regulated processes in the appropriate space below.

CFR 4___ Standards (mg/L)									
	Pollutant								
Maximum daily ¹									
Monthly Average ¹ not to exceed									

¹ From appropriate Categorical standard. Production based Categorical Industries must convert to concentration using historical production and flows.

B. Analysis of wastewater at sampling point.

In accordance with 40 CFR 403.6(e) [see note 3 at bottom of page 4] an industrial user may sample and analyze the total plant flow and calculate an alternate concentration limit using the combined wastestream formula if regulated process flows are mixed with other flows prior to treatment and/or sampling. Record the analytical results for all regulated pollutants below. Record the calculated concentration limits as well as the actual measured concentrations.

40 CFR 4_____ <u>Measured</u> Regulated Pollutants (mg/L)									
Daily Max ³									
Avg Monthly ⁴									

³ Actual Measured Maximum Concentration from Lab results. *{Facility's results must include the (ADEO certified) lab's results & QA sheet*

⁴ Actual Measured Average Concentration from Lab results. *along with a complete chain of custody}*

D. User Sample Location*: _____

*This location should be identified on the wastewater flow schematic required in Section 3.E.(ii) above.

Sample Type (At a minimum, timed composite samples are required except where not feasible or where grab samples are specifically required)

Number of Samples Taken: _____ Frequency (Daily, Weekly, etc) _____

Analytical Methods Used (Must be in accordance with 40 CFR 136--for example: Meth. 200.8, 624, 625, etc.)

(6) Certifications [**403.12(b)(5)(viii)** & **403.12(b)(6)**]:

40 CFR 403.12(b)(6) Compliance Certification

A. Are applicable categorical pretreatment standards being met on a consistent basis? YES ___ NO ___

B. If no, do you require:

(i) Additional operation and maintenance (O&M) to achieve compliance? YES ___ NO ___

(ii) New or additional pretreatment facilities to achieve compliance? YES ___ NO ___

40 CFR 403.12(b)(5)(viii) Representative Certification

I certify, to the best of my knowledge, that the sampling and analysis as shown in Section 5 above is representative of the User's normal work cycles and the expected Discharges to the POTW.

Print Name: _____ Signature: _____ Date: _____

In accordance with 40CFR403.12(b)(5)(viii) & (6) a qualified professional must complete and sign these certifications in the space below.

Name & Title _____
Qualified Professional (Please Type or Print)

Official Capacity _____

Signature _____

Date _____

(7) A. If additional O&M or new or additional pretreatment will be required to meet categorical pretreatment standards on a consistent basis, provide an explanation (attachment additional pages if necessary). New sources must not commence discharge until compliance with Categorical Standards are met.

B. Signatory Requirement [40 CFR 403.12(I)]

40 CFR 403.12(I)(3) Authorization to Sign Environmental Reports

I hereby authorize persons filling the position title of _____,
responsible for the overall operation of the _____, Arkansas, to sign all regular
reports required by National Pretreatment Standards--pursuant to ADEQ rules and/or Clean Water Act (CWA) regulations.
This written authorization is provided in accordance with 40 CFR 403.12(I) and comparable state regulations.

Corporate official name & title here

Signature

Date

40 CFR 403.6(a)(2)(ii) Certification

I certify under penalty of law that I have personally examined and am familiar with the information in this Baseline Monitoring Report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name of Authorized Representative (Please Type or Print)

Official Title (Please Type or Print)

Signature

Date