

Henderson, Katie

From: Gilliam, Allen
Sent: Thursday, August 09, 2012 8:57 AM
To: Jeff Davis
Cc: Henderson, Katie; Fuller, Kim
Subject: AR0021806_Little Rock Pretreatment Program non substantial modifications reply_20120807

Jeff,

Modifications to LRW's Pretreatment Program were received on 7/30/12, reviewed, approved and deemed non-substantial as they do not meet the Substantial Modifications criteria per 40 CFR 403.18(b). Thank you for the format you submitted them in.

This office will exercise its Approval Authority status to make this decision and per 40 CFR 403.18(d)(2), "Within 45 days after the submission of the POTW's statement, [ADEQ] shall notify [LRW] of its decision to approve or disapprove the non-substantial modification."

It is this office's understanding that non-substantial modifications to your Pretreatment Program such as the one you just submitted does not necessitate modifications to your NPDES permits.

Please submit your entire program in three (3) ring notebook(s). I have LRW's Procedures Manual (submitted 4/29/99) in a three (3) ring notebook, but LRW's "Technically Based Local Limits Development Document" (revised date – 11/17/98) and LRW's EAD's "Approved Pretreatment Program Manual" (effective date 4/1/2008) are in spiral-bound notebooks. Modifications (such as those just submitted) to those two documents will prove unwieldy as I cannot insert revisions and extract revised pages without tearing out pages and stapling in new ones.

Thank you for including the revised date on the pages revised and your attention to the above matter.

Please keep this correspondence in your Pretreatment file for possible review by outside parties.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625