

Gilliam, Allen

From: Gilliam, Allen
Sent: Tuesday, April 12, 2011 1:25 PM
To: 'Jeff Davis'; 'Stanley Suel'
Cc: Fuller, Kim; Ramsey, David; Kaelin, Cynthia; Anderson, Alan; Garner, Cindy; Bolenbaugh, Jason
Subject: AR0021806_Little Rock's (including permits AR0040177 & AR0050849) March 2011 Annual Pretreatment Report Reply_20110412

Mr. Suel,

Your March 2011 Annual Pretreatment Report was received 3/31/11, reviewed, deemed complete and compliant with the National Pretreatment Requirements in 40 CFR 403.12(i) and Pretreatment reporting conditions in your three (3) NPDES permits. Kudos go out to your Pretreatment Staff and your industries for achieving zero (0) percent SNC.

There are no further actions deemed necessary at this in time.

One request, however (a return e-mail will suffice for this office's records): Please provide the basis why I-30 Tank Wash and Scale does not meet the Categorical guidelines in 40 CFR 442, Subpart A—Tank Trucks and Intermodal Tank Containers Transporting Chemical and Petroleum Cargos. Pages 6 & 7 of 12 of your Pretreatment Report indicates, "...clay residuals discharging through the sewer [and]...LRW...crew found hardened clay type materials that had to be removed".

40 CFR 442.2 General Definitions describe, "Cargos which are not considered to be food grade or petroleum are considered to be chemical cargos."

One would believe a "Pollution Management Plan" submitted by I-30 Tank Wash (and approved by LRW) per 40 CFR 442.15(b)(5) might be in order to prevent potential blockages.

Thank you for your timely annual report remaining in compliance with National Pretreatment Regulations.

Sincerely,

Allen Gilliam

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