

Gilliam, Allen

From: Gilliam, Allen
Sent: Thursday, January 20, 2011 1:28 PM
To: 'cblanton@muellerindustries.com'
Cc: 'wynnewater@yahoo.com'; Fuller, Kim
Subject: AR021903_Mueller Copper (ARP000036) December 2010 Semi-Annual Pretreatment Report Response [Corrected]_20110120

My apologies Mr. Blanton,

The correct response date at the bottom of the below correspondence should state "...and a response to this correspondence within 30 days (2/20/11).", not "...(2/1/11)."

Please pardon the oversight,

Allen Gilliam
ADEQ State Pretreatment Coordinator'
501.682.0625

-----Original Message-----

From: Gilliam, Allen
Sent: Thursday, January 20, 2011 11:09 AM
To: 'cblanton@muellerindustries.com'
Cc: 'wynnewater@yahoo.com'; Fuller, Kim
Subject: AR021903_Mueller Copper (ARP000036) December 2010 Semi-Annual Pretreatment Report Response_20110120

Mr. Blanton,

Your December 2010 semi-annual pretreatment report was received on 1/3/11. It was reviewed and based on the recent (12/16/10) compliance assurance visit (CAV) conducted at your facility, this office has a question regarding your production based limits, their conversion to equivalent concentration limits and a dilution stream that's not readily apparent where its used (or not) in that conversion.

Mike Hallowell escorted me through your facility during the CAV and explained as much as he could regarding different elements in the CAV form. Mike's transparent cooperation during that visit was much appreciated, but pointed out either a non-contact or fresh water stream is added to your regulated stream "for more efficient treatment" of regulated pollutants under 40 CFRs 464 and 468. This non-regulated stream would be considered dilution and should not be included in your calculations for the conversion to equivalent concentration limits. This may be apparent on your spreadsheets, but Mike did not have access to your spreadsheet program.

If your spreadsheet's production based limits are converted directly to mass from your reported production, then converted to equivalent concentration limits using ONLY the regulated wastewater flows, the dilution issue is moot. Following these steps your limits' calculations are based on mass converted to equivalent concentration without consideration of the dilution stream. If this is the way your spreadsheet is set up, please respond in the affirmative. Your mass limits would not change even if you had a 2 to 1 ratio of dilution versus regulated wastewater.

In other words, if your reported regulated "direct chill, drawing spent lubricant and solution heat treatment" wastewater flows are the only wastewater volumes used in your conversion to concentration limits, you are on the right track.

Based on your latest report's analyticals, even if the dilution stream was included as a "regulated stream" and is used in your conversion to equivalent concentration limits, rough "back-of-the-hand calculations" indicate you are in still in compliance with the equivalent concentration limits.

Your CAV finalized report is pending, but at this moment, please supply this office with a more comprehensive flow schematic (a water balance indicating volumes in gpd from the various sources to the pretreatment system) showing where this non-regulated stream is added to supplement "more efficient treatment".

In the future, please include your contract lab's cover letter and results page. And, as previously mentioned, these semi-annual reports can be electronically submitted as a PDF attachment as long as the pertinent signatures are included and legible.

Again, analyzing for "dissolved metals" serves absolutely no purpose, is a waste of time and money. Analyzing for Total Metals is the most conservative as it includes the portion of metals that may be dissolved. Please ask your City contact if you can be relieved of this "requirement" if they were the ones that imposed it. Analyzing for dissolved metals is meaningless and serves no purpose under the Pretreatment Standards in 40 CFRs 464 or 468.

Thank you for your timely report and a response to this correspondence within 30 days (2/1/11). If there are any immediate questions, please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Don O'Neal / City of Wynne / Water & Wastewater Manager