



COMMISSIONERS

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P.O. Box 1807 • Phone (479) 754-3148 • Clarksville, Arkansas 72830

October 17, 2007

Allen Gilliam
State pretreatment Coordinator
Arkansas Department of Environmental Quality
5301 Northshore Drive
Little Rock, AR 72118

RE: Permit # AR0022187

Dear Mr. Gilliam:

We have received and are working on the required modifications to our pretreatment program. The following is a brief description of the changes we intend to make.

- B1.) The requirements under 403 will be sent to the IU's and hazardous waste generators.
 - 2.) BMP's will be added to permits as well as daily max. Baldor will be changed to a new source.
 - 3.) Complete certification statement will be included in all reports and applications.
 - 4.) We will start earlier next time in enforcement. As discussed in an earlier letter, customer was addressing the identification of excursion source aggressively. Solution is a long process. We were handling their excursion and billing them for additional costs, which they paid.
 - 5.) Chain of custodies will have all persons signing including "received by".
 - 6.) Cyanide has been changed to a grab on Metal finishers permit.
 - 7.) Baldor and Greenville Tube will send TTO certification statement in with each monitoring report. We will return a letter approving their TOMP when sufficient.
- C.) All recommendations will be taken into consideration and worked on as we have time and man power.

OCT 22 2007

4659 V/H

NPDES PERMIT FILE
NPDES # AR0022187
AFIN # 36-00038
Permit PN
 Correspondence
 Technical Backup
10-22-07 Date Scanned
V/H



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D.) We will send a letter with the revised streamlined rules to ADEQ for approval.

Please call me at (479) 754-7929 if you have any questions.

Thank you,

A handwritten signature in black ink that reads "Pam Crow".

Pam Crow
Pretreatment Coordinator