

Gilliam, Allen

From: Gilliam, Allen
Sent: Wednesday, August 03, 2011 9:30 AM
To: 'tommy.campbell@ladarling.com'; Andy Stickler (astick@grnco.net); 'chris.hoggard@ladarling.com'
Subject: AR0033979_L.A. Darling (ARP0000011) July 2001 Semi-Annual Pretreatment Report Response_20110803

Mr. Campbell,

Your July 2011 semi-annual Pretreatment report was received, reviewed, deemed complete and compliant with the National Pretreatment Regulations in 40 CFR 403, more specifically the Federal Metal Finishing Standards in 40 CFR 433.15 with the following caveat.

This office has overlooked the following detail during previous reviews of your reports: It appears from your adjusted 40 CFR 433.15 limits, there's a dilution stream which has been taken into account although Section (4) "Flow Measurement", of your report does not indicate such. Please advise if this is the case and in the future include that dilution factor (hand calculations?) based on the combined wastestream formula (CWF) found in 40 CFR 403.6(e)(1)(i).

Correspondence from your office signed and dated by Greg Spooner and Andy Stickler back in 7/2002 indicated there was 600 gpd of boiler blowdown (dilution). The original Baseline Monitoring Report signed by Cindy Garner and Roy Johnson back in 3/1995 indicated there was "400 gpd of boiler blowdown and 200 gpd of air compressor condensate".

Without a dilution stream, your CFR 433.15 Pretreatment Standards for an Existing Source (Section (5)C.) would be:

| Pollutant or pollutant property | Maximum for any 1 day | Monthly average shall not exceed |
|---------------------------------|-----------------------------|----------------------------------|
| | Milligrams per liter (mg/l) | |
| Cadmium (T) | 0 .69..... | 0 .26 |
| Chromium (T) | 2 .77..... | 1 .71 |
| Copper (T) | 3 .38..... | 2 .07 |
| Lead (T) | 0 .69..... | 0 .43 |
| Nickel (T) | 3 .98..... | 2 .38 |
| Silver (T) | 0 .43..... | 0 .24 |
| Zinc (T) | 2 .61..... | 1 .48 |
| Cyanide (T) | 1 .20..... | 0 .65 |
| TTO | 2 .13 | |

Please correct your Section (5)C. if there are no dilution streams. If this is the case, please submit (preferably via PDF attachment) a corrected 2nd page (only) of the semi-annual report.

If there is a dilution stream Sections (4) and (5) will have to be resubmitted (preferably via PDF attachment) with the CWF taken into account.

Apologies are extended for not catching this sooner. If there are any questions or concerns please feel free to contact this office.

Thank you for your timely report and continued compliance with the National Pretreatment Program (with or without a dilution stream).

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Andy Stickler/Stickler Consulting Services

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