

From: [Gilliam, Allen](#)
To: [Harrison tim holt](#); [harrison Kathryn Catlin \(kathryn.catlin@cityofharrison.com\)](#)
Cc: [Burrow, Kealey](#); [Ramsey, David](#); [Allen-Daniel, Leslie](#)
Subject: AR00034321_Harrisons response to required actions and recommendations to July 2015 Pretreatment Audit_20151019
Date: Monday, October 19, 2015 8:41:26 AM
Attachments: [Harrison's Response to July '15 Pretreatment Audit.pdf](#)

Tim,

Your response to Harrison's July 2015 Pretreatment Program Audit (attached) was received, reviewed and deemed adequate.

When re-evaluating Harrison's Maximum Allowable Industrial Loadings/TBLLs (if necessary) using the State supplied spreadsheets, if you have any questions regarding data input, please feel free to contact this office.

Please submit the final draft of Harrison's Pretreatment Program within 90 days from the date on this correspondence for final approval.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports



Department of Public Works

October 6, 2015

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Dear Allen,

adequate #11

The following items are in response to the summary of findings with required action report dated August 28, 2015 that resulted from the Pretreatment Program Audit/Pollution Prevention Assessment conducted by ADEQ in July 2015.

B) Summary of Findings with Required Actions

1) (a) During the file review it was found that Pace's permit limits' basis included Zinc die casting and Metal finishing components. Pace does not have Zinc die casting or any Metal finishing core operations onsite.

The City must correct Pace's permit limits to reflect its correct 40 CFR 464.15 sub process standards using EPA's "building block" approach to arrive at equivalent concentration limits.

Solution: Industrial Wastewater Discharge Permit renewals have been submitted by all of the Industrial Users. In Pace's renewed permit limits for Zinc Die Casting and Metal finishing have been (will be) removed.

(b) Permit limits could not be confirmed reviewing the other two production based industries' example limit calculations. The basis for their average production rates and flow rates were not clearly shown. In other words, a chart was not seen averaging long term flows or production.

Solution: Long term flow and production rate data for each industry has been compiled using an Excel spreadsheet.

(c) Anchor Die Casting's inspection form indicates "production rate or flow is substantially (+/- 20%) different from those used in calculating a (permit) limits. It is EPA's rule of thumb if changes in a facility's production or process flows change +/- 20%, the facility's permit limits should be revised. The City must revise ADC's permit limits based on this substantial difference.

✓ **Solution:** Industrial Wastewater Discharge Permit renewals have been submitted by all of the Industrial Users. The renewed Industrial Wastewater Discharge Permits will utilize current flow and production rates revise industrial users' discharge permit limits.

2) The Industrial inspection forms was adequate, but answers were vague, or nonexistent in areas regarding evaluation of sources of regulated wastewater, description of manufacturing processes, chemical handing and the IU's pretreatment system. More narrative needs to be included to explain ion better detail these areas' evaluations.

✓ **Solution:** The industrial inspection forms will be updated to include the following: verification of production or regulated flows, verification of flow and pH meter calibration and verification of industry sampling procedures. The inspection form will include observations on housekeeping, leaks, rust, cracked welds on tanks, etc.

3) During the file review and site visits, it was discovered that not all facility wastewater flow schematics or narrative process descriptions were comprehensive, current, or accurate. The City must require its permitted industries to keep these documents updated.

✓ **Solution:** The City is currently working with the industries to update wastewater flow schematics and the Fact sheets for each of the industrial users.

4) During Claridge Extrusion's file review, it was discovered their periodic report included an incorrect certification statement. The city must notify Claridge of its error and correct it.

✓ **Solution:** Buddy Shatswell, Maintenance Supervisor – Claridge Extrusion, was provided the required certification statement on July 13, 2015. Reports submitted since that date contains the required certification statement.

5) During the checklist review it was noted that the City had conducted a fairly recent IU survey. Information compiled/summarized from these surveys could not be produced. The City must create a database with its surveys most pertinent information on it.

✓ **Solution:** Information from the completed industrial user surveys is in the process of being compiled using an Excel spreadsheet.

D) REQUIRED PROGEAM MODIFICATIONS TO THE APPROVED PRETREATMENT PROGRAM NECESSARY TO BRING THE PROGRAM INTO COMPLIANCE WITH THE LETTER OR INTENT OF THE CURRENT REGULATORY REQUIREMENTS

1) Finalize modifications to the City's Program to be current with 40 CFR 403.

Solution: The City is in the process of reviewing the Pretreatment Program to determine what portions, if any, do not currently meet the streamlining revisions in 40 CFR 403.

2) Submit to this office 6 representative domestic/light commercial analysis using the most sensitive methods. The current technically based local limits analysis was done in May of 2000 and the methods used were not as sensitive as what can be achieved today.

Solution: Six domestic/light commercial grab samples were collected on September 21st, 2015 and submitted to Waypoint Analytical in Memphis for analysis using more sensitive methods.

If you have any questions or require any additional information, please feel free to contact either myself or Kathryn Catlin.

Sincerely,

A handwritten signature in black ink that reads "Tim Holt". The signature is written in a cursive style with a large, sweeping initial "T".

Tim Holt,
Pretreatment Coordinator, City of Harrison

Cc: Kathryn Catlin, City of Harrison