

Henderson, Katie

From: Gilliam, Allen
Sent: Thursday, September 16, 2010 1:47 PM
To: 'jorrick@macleanfogg.com'; 'sthielemier@maclean-fogg.com'; 'sthielemier@macleanfogg.com'
Cc: Henderson, Katie; 'pocawater@suddenlinkmail.com'
Subject: Mac-Lean ESNA (ARP001048) Revised December '09 and June 2010 semi-annual reports response (AR0034835)



433 report
form.doc (106 KB)

Jeff and Steve,

Your revised December '09 and June 2010 semi-annual reports were received, reviewed, deemed complete and compliant with 40 CFRs 433 and 403. There is no further action necessary at this point.

After conversations with Steve regarding the estimated flows, both regulated and dilute, the confusion over the sanitary flow was straightened out. It is not commingled with the other dilution flows. Using the combined wastestream formula in 40 CFR 403.6, I was mistakenly including the sanitary stream as part of the total dilution flows. A more detailed flow schematic might have helped this office realize this.

Steve and I went through a quick example using the combined wastestream formula to calculate what this office would call a dilution factor. This dilution factor is multiplied times your metal finishing limits located in 40 CFR 433.

The formula basically divides the regulated flow by the total flow measured at your sampling station and results in a number less than one. Our exercise, choosing Cd as an example, came up with the same daily maximum and maximum monthly limits ("MAC" and "AAC" on your reports, page 2) using a dilution factor of ~0.56.

Looking back at some of your older reports, these numbers calculated differently because of your total regulated flows and should have been corrected. You were still in compliance, even with the wrong limits.

Attached is a somewhat revised report form where you'll have to calculate your monthly average limit (the most stringent) for each semi-annual report in the future. I've renamed "MAC" to "Maximum for 1 day" and "Monthly Average" limits.

Apologies for some of the page breaks not working making the attached form appear dis-attached in places, but hopefully you can find someone who can further correct this form (or use it as is). Please save this blank report form for future use if you intend calculating the dilution factor and reporting semi-annually in-house.

Thank you for your cooperation and patience.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

e-Attch: 40 CFR 433 Semi-Annual Report Form

ec: Katie Henderson/E-drive/"Pretreatment Reports?
William Daniel/Pocahontas Plant Manager