

Gilliam, Allen

From: Gilliam, Allen
Sent: Monday, October 03, 2011 4:02 PM
To: 'sthielemier@macleanfogg.com'
Cc: 'pocawater@suddenlinkmail.com'; Jerry Poague - Poague & Assoc. inc.
Subject: AR0034835_Mac-Lean ESNA (ARP001048) September 2011 Revised Schematics_20111003

Steve,

Thank you for the updated schematics. The flows now match more closely what is reported on your semi-annual reports.

The revised schematic identifying your wastewater discharge sampling point downstream of your "pretreatment" system fulfills 40 CFR 403.12(b)(3), "Description of operations. The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes [emphasis added]."

No further action is deemed necessary at this time.

Thank you for your patience and cooperation in remaining compliant with the National Pretreatment Regulations in 40 CFR 403.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.065

ec: William Daniel, City of Pocahontas Plant Manager/Jerry Pogue, Pogue and Associates

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From: Thielemier, Steve [<mailto:SThielemier@macleanfogg.com>]
Sent: Monday, October 03, 2011 8:25 AM
To: Gilliam, Allen
Cc: Autry, Donnie; Ferrell, Bobby
Subject: RE: AR0034835_MacLean ESNA (ARP001048) August 2011 revised TOMP Approval_20110902

Allen

I'm sending two attachments in response to your comments. One is for the flow and the other is for the sampling point. If you have any questions about these please get back with me.

Thanks Steve Thielemier

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

From: Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]
Sent: Friday, September 02, 2011 2:14 PM
To: 'sthielemier@macleanfogg.com'

Cc: pocawater@suddenlinkmail.com; 'jorrick@macleanfogg.com'; Jerry Poague - Poague & Assoc. inc.
Subject: FW: AR0034835_MacLean ESNA (ARP001048) August 2011 revised TOMP Approval_20110902

Steve,

Your updated Toxic Organic Management Plan (TOMP) was received, reviewed and is deemed satisfactory by this office per the provisions under 40 CFR 433.12(b). This TOMP is more comprehensive than the old '95 version and better explains where MacLean's toxic organics are used, in what quantities they are kept on-site and how they are kept from entering your regulated wastestream discharged to the City of Pocahontas' sewage collection system.

This correspondence should be kept with your Pretreatment related documents as it is a requirement to obtain a letter from the Control Authority (ADEQ) stating the TOMP developed and [to be] implemented by MacLean satisfies your best management plan regarding toxic organics ("the TOMP").

In lieu of monitoring for the list of toxic organics in 40 CFR 433.11(e) you may continue to sign and certify, "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or pretreatment standard] for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to ADEQ".

Comments: 1) Figures 1 and 2 and the narrative description (page 4) of your processes submitted with the TOMP indicated 10,000 gpd of dilution water is mixed with the regulated wastestream prior to sampling. Your previous three (3) semi-annual reports have indicated a dilution volume closer to ~1,300 gpd from your two (2) non-contact cooling water systems. Are dilution volumes in Figures 1 and 2 in error and need to be corrected? Apologies are extended if I am missing something.

2) The sampling point should be clearly marked on Figure 2.

Volume corrections and the addition of the sampling point can be made to these Figures and resubmitted via a PDF attachment.

If you have any comments, please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: William Daniel, City of Pocahontas Plant Manager and Jerry Pogue, Pogue and Assoc.

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