

# ADEQ

ARKANSAS  
Department of Environmental Quality

September 8, 2008

Chad Burdin  
Plant Engineer  
ITW Paslode  
Pocahontas, AR 72455

NPDES PERMIT FILE

NPDES # AR0034835

AFIN # 61-00055

Permit PN

Correspondence

Technical Backup

9/10/08 mll Date Scanned

Re: ITW Paslode's (Pocahontas NPDES# AR0034835, AFIN# 61-00055) Reporting Requirements Under 40 CFR 403

Dear Mr. Burdin:

In response to your 7/24/08 request for clarification and proposed reporting requirements to ADEQ, please accept the following for your records:

According to conversations with both you and your consultant, Steve Neal (Waste Services Inc.), the only process wastewater generated and discharged to the City's sewage collection system is from the alkaline cleaning operations under 40 CFR 420.115, Subpart K.

Under that subpart, you have discerned properly, the only Pretreatment requirements in that subpart state, "Any existing source subject to this subpart which introduces pollutants into a publicly owned treatment works must comply with 40 CFR Part 403."

As previously stated in this office's 4/14/08 correspondence, the General and Specific Prohibitions [40 CFR 403.5(a) & (b)] apply to ITW's process wastewater.

Regarding any reporting requirements to ADEQ, in this case where ITW's process wastewater doesn't fall under a category with specific Pretreatment numeric or best management practices limitations, ADEQ is not requiring at this time, reports from industrial users (IUs) without Pretreatment standards [40 CFR 403.12(h)].

It would be in ITW's best interest to send semi-annual certification statements to the appropriate City officials that the above general and specific prohibitions are being met. Report frequency of other pollutants of concern, again, is left to the City's discretion.

These certification statements and any other City imposed sample results should be kept on file at your facility for a minimum of three (3) years.

If there are further questions or comments, please feel free to contact this office at (501) 682-0625.

Sincerely,



Allen Gilliam  
ADEQ State Pretreatment Coordinator

cc: Bill Daniel, Plant Mgr. / Pocahontas Water Dept. / 207 HWY 67 S / Pocahontas, AR 72455



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June 24, 2008

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Dear Mr. Gilliam,

Thank you for your April 14, 2008 letter to Mr. Stephen Neal of Waste Services Inc. regarding the pretreatment categorical status of ITW Paslode's facility in Pocahontas, Arkansas. I am writing this letter to confirm and clarify our understanding of that letter.


We concur with your determination that Paslode is subject to the requirements under the Alkaline Cleaning subcategory of the Iron and Steel Manufacturing category, 40 CFR Part 420, Subpart K. The pretreatment standards for existing sources under this subcategory (40 CFR § 420.115) only require compliance with the general pretreatment standards at 40 CFR Part 403. Accordingly, based on the U.S. EPA guidance manual "Introduction to the National Pretreatment Program," Paslode is not a Categorical Industrial User under the pretreatment regulations and not subject to CIU requirements such as the baseline monitoring report requirement at 40 CFR § 403.12(b).

Although not required to submit BMRs to ADEQ, it appears that the periodic compliance reporting requirement at 40 CFR § 403.12(h) would apply to Paslode, because that provision applies to Industrial Users not subject to categorical standards. However, that requirement involves reporting on pollutants, flow data, and production rates based on Control Authority requirements, but there are no such requirements imposed on Paslode under 40 CFR Part 403, 40 CFR § 420.115, or ADEQ regulations. Given that there does not appear to be any required information for Paslode to report under the periodic compliance reporting requirement, we seek confirmation on what ADEQ requires from Paslode in order for the facility to be in compliance with 40 CFR § 403.12(h). Paslode proposes that a semi-annual compliance certification on the facility's compliance with 40 CFR Part 403 requirements would be an appropriate means for Paslode to report to ADEQ under 40 CFR § 403.12(h). We request confirmation from ADEQ that submittal of semi-annual compliance certifications to ADEQ will satisfy this requirement.

Finally, as you suggested in your letter, Paslode is engaged in communications with the City of Pocahontas to determine and reach an agreement on appropriate reporting and monitoring for the City's purposes. Paslode is committed to ensuring compliance with 40 CFR Part 403 and that pass-through and interference at the City's wastewater plant do not result from Paslode's wastewater discharges.

We look forward to your response to this letter, in particular regarding Paslode's proposal to provide semi-annual compliance certification to fulfill the reporting requirement at 40 CFR § 403.12(h). Please feel free to contact me at 870-892-1156 ext. 18 with any questions.

Sincerely,

  
Chad Burdin  
Plant Engineer  
ITW Paslode  
Pocahontas, AR 72455