

ADEQ

ARKANSAS
Department of Environmental Quality

September 18, 2009

G W Roach, Jr Vice President
Roach Manufacturing Corp
808 Highway 463 North
Trumann, AR 72472

Attention: Sherri Tribble, Office Manager

Re: State Pretreatment Reporting Requirements
(AFIN 56-00031 ARP001060)

Dear Mr. Roach:

In accordance with **40CFR403.12** industrial users with processes regulated by categorical pretreatment standards (40CFR433, et al) must submit reports to the Control Authority (ADEQ/Department) to demonstrate continued compliance when the discharges from the regulated processes enter, can enter or will enter a Publicly Owned Treatment Works (POTW-- local municipal sewer system). Even if Roach (an industrial user) falls under a categorical standard, Roach is not required at this time to have an ADEQ permit prior to commencing discharge to the City of Trumann (City) POTW. Nonetheless, the City may require a local permit.

The contents of 40CFR403.12 may be viewed on the internet at:

<http://ecfr.gpoaccess.gov/>

If Roach falls under a categorical pretreatment standard and plans to continue discharging the regulated wastewater to the POTW, then in accordance to 40CFR403.12(b) Roach must submit a Baseline Monitoring Report (BMR) to the Department. Roach is not required to measure or analyze wastewater for the BMR (estimates are allowed). However, if flow data and lab analysis of the wastewater exist and/or data from a similar facility are available, Roach should submit those results.


In reference to the telephone conversation (Torrence and Tribble) on September 8, 2009, find enclosed a form [*Application for Determination/40CFR403.6(a) or Baseline Monitoring Report/40CFR403.12(b)*] for notifying the City and the Department of Roach's intention to continue discharging regulated wastewater into the city collection system. If Roach decides to continue to be a categorical industrial user, Roach must get authorization from the City to continue discharging regulated wastewater into the local collection system. If the city agrees to continue to accept the wastewater, the BMR is due before February 26, 2010.

Pending approval by the City, Parker will be required to submit reports every February and August in the future. If Parker submits the BMR in the month of February 2010, the BMR may also serve as the February semi-annual report. Please send the city a copy of the BMR. Send the original to the Department. The plant manager must sign the report. Also please send the Department a copy of the letter from the City which authorizes Parker Hannifin to continue discharging to the POTW.

Please note that Parker Hannifin must currently be in compliance with 40CFR433 pretreatment standards on a consistent basis or the Department may request Parker Hannifin to cease regulated discharge to the POTW until Parker Hannifin is capable of compliance.

If Parker Hannifin or an authorized representative has questions or needs more information, please contact the Department at 682-0626 or torrence@adeq.state.ar.us.

Sincerely,



Rufus J. Torrence
ADEQ NPDES Engineer

Enclosures: CIU_APP_BMR_FORM_HD_20090908

cc: Scotty Jones, Manager
City of Trumann Water & Sewer
106 E Main St
Trumann, AR 72472

APPLICATION FOR DETERMINATION / 40CFR403.6(a)
OR
BASELINE MONITORING REPORT / 40CFR403.12(b)

40 CFR PART 403 - GENERAL PRETREATMENT REGULATIONS FOR EXISTING AND NEW SOURCES OF POLLUTION

HISTORICAL DATA AVAILABLE

RETURN TO: ARK DEPT OF ENVIRONMENTAL QUALITY
 NPDES / PRETREATMENT SECTION
 5301 NORTHSORE DRIVE
 NORTH LITTLE ROCK, ARKANSAS 72118-5317

Use of this form is not an EPA/ADEQ requirement.

(1) IDENTIFYING INFORMATION			
A. User's Legal Name & Mailing Address		B. Facility Name & Location	
C. Name of Owners & Address		D. Facility Contact (PROVIDE THE NAME, TITLE & PHONE NO. OF A DESIGNATED PERSON TO CONTACT IF ADDITIONAL INFORMATION IS NECESSARY)	
D. Name of Operators:			
F. Number of Employees	G. Number of Shifts/Day	H. Number of Months/Year Plant Operates:	
I. PROVIDE BELOW THE NAME OF THE PUBLICLY OWNED TREATMENT WORKS (POTW--SEWERAGE AUTHORITY, MUNICIPALITY, ETC.) THAT RECEIVES / WILL RECEIVE THE WASTEWATER DISCHARGES FROM THIS FACILITY			
J. Provide the Date the facility will begin discharging <u>regulated</u> wastewater to the POTW		K. Provide the Date the suspected regulated operation was installed	
(2) PERMITS: DESCRIBE ALL ENVIRONMENTAL CONTROL PERMITS HELD BY OR FOR THE FACILITY			
DESCRIBE TITLE OF THE PERMIT	PERMIT NO.	ISSUING OFFICE	EXP. DATE

APPLICATION FOR DETERMINATION OR BASELINE MONITORING REPORT (CON'D)

(3) DESCRIPTION OF OPERATION

A. List Raw/Basis Materials used (e.g., steel, aluminum, etc):

B. List Chemicals used (Avoid using brand names/show constituents; e.g., phosphoric acid, nickel sulfate, etc):

C. Describe Manufacturing or Service Activities Conducted and the Final Products:

D. Describe (and summarize below) all suspected Regulated Process (Attach additional sheet if necessary):

Process Description	Prod Rate ⁱ	Category ⁱⁱ	Subpart ⁱⁱⁱ	SIC Code

APPLICATION FOR DETERMINATION OR BASELINE MONITORING REPORT (CON'D)

E. Cite evidence and reasons why particular subcategories are applicable and why others are not applicable (Attach additional sheet if necessary):

Applicable subcategories

Non-Applicable Subcategories

F. Provide on a separate sheet: (1) a schematic drawing of the part flow through each suspected regulated process that generates wastewater--optional for concentration-based industries (2) a schematic drawing (blank enclosed) showing all wastewater flows (regulated? and nonregulated), location of any treatment system, sampling location(s), flows for each individual wastestream and point(s) of discharge to the POTW.

(4) FLOW MEASUREMENT - Provide most current and accurate data

APPLICATION FOR DETERMINATION OR BASELINE MONITORING REPORT (CON'D)

A. Total Plant Flow in Gallons per Day (gpd):

Average: _____ Maximum: _____

Regulated? Process	Average Flow Rate (gpd)	Maximum Flow Rate (gpd)	Type of Discharge (Cont., Batch, etc)
Unregulated ^{IV}	*****	*****	*****
<i>Cooling Water</i>			
<i>Sanitary Waste</i>			

(5) MEASUREMENT OF POLLUTANTS - Provide analytical data on the regulated pollutants in the proposed discharge

A. Provide here or on a separate sheet a description of any existing or proposed wastewater treatment system.

B. Analysis of Regulated Flows: The industrial user must provide an analysis (historical data is acceptable) of the effluent from the proposed regulated processes. (Only those pollutants specifically regulated by the applicable category need be reported.)

Suspected Regulated Process(es): _____

Pollutant											
Maximum (mg/l)											
Average (mg/l)											

C. Provide the date of the analyses (if the data is historical, provide the time period):

APPLICATION FOR DETERMINATION OR BASELINE MONITORING REPORT (CON'D)

General Comments:

APPLICATION FOR DETERMINATION OR BASELINE MONITORING REPORT (CON'D)

40 CFR PART 403 - GENERAL PRETREATMENT REGULATIONS FOR EXISTING AND NEW SOURCES OF POLLUTION

Excerpts from §403.5 National pretreatment standards: Prohibited discharges

(a)(1) *General prohibitions.* A User may not introduce into a POTW any pollutant(s) which cause Pass Through or Interference. These general prohibitions and the specific prohibitions in paragraph (b) of this section apply to each User introducing pollutants into a POTW whether or not the User is subject to other National Pretreatment Standards or any national, State, or local Pretreatment Requirements.

(b) *Specific prohibitions.* In addition, the following pollutants shall not be introduced into a POTW:

(1) Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21.

(2) Pollutants which will cause corrosive structural damage to the POTW, but in no case Discharges with pH lower than 5.0, unless the works is specifically designed to accommodate such Discharges;

(3) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in Interference;

(4) Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW.

(5) Heat in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW Treatment Plant exceeds 40oC (104oF) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits.

(6) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;

(7) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

(8) Any trucked or hauled pollutants, except at discharge points designated by the POTW.

SIGNATORY REQUIREMENT

I certify under penalty of law that I have personally examined and am familiar with the information in this Application for Determination (or Baseline Monitoring Report) and all attachments, and that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name - Authorized Representative (Corporate Executive, Plant Manager, et al) per 40CFR403.12(I)

Official Title

Signature

Date

ⁱList the production rate (million off-lbs, million ft², etc); applies only to industries which have production based standards. This does not apply to industries (40CFR433 Metal Finishers, et al) with concentration based limits.

ⁱⁱCite the Applicable/Appropriate Pretreatment Standard, e.g. 40CFR433

ⁱⁱⁱCite appropriate subcategory of Pretreatment Standard; e.g., find in 40CFR467 Subpart A--Rolling With Neat Oils Subcategory

^{iv}Unregulated processes have pollutants regulated by law but the process is not regulated.