

**Gilliam, Allen**

**From:** Gilliam, Allen  
**Sent:** Friday, April 17, 2009 12:23 PM  
**To:** 'sales@hotrodlane.cc'; 'richard@hotrodlane.cc'  
**Cc:** 'Mike Spencer'  
**Subject:** FW: Street & Performance Quarterly Reports (ARP001057) for discharge to Mena's POTW (AR0036692)

Richard,

I failed to also mention, these reports should also be copied to Mena's Water Utility, whether that be Mary Timmons or Mike Spencer as a professional courtesy.

Please keep the city and myself apprised regarding your next batch discharge with a completed "Report Form" which is attached again. This would constitute one of your quarterly reports for the 4/calendar year reports.

If you have any questions about the remaining reporting requirements incumbent on your facility under the Federal Pretreatment Standards (40 CFR 403.12(b), (d), (e), (f) & (g), please don't hesitate to ask. They are located @ [http://edocket.access.gpo.gov/cfr\\_2003/julqtr/40cfr403.12.htm](http://edocket.access.gpo.gov/cfr_2003/julqtr/40cfr403.12.htm) .

40 CFR 403.12(f) is especially important: (f) Notice of potential problems, including slug loading. All categorical and non-categorical Industrial Users shall notify the POTW immediately of all discharges that could cause problems to the POTW, including any slug loadings, as defined by Sec. 403.5(b), by the Industrial User.

As mentioned before, if there are any questions, please feel free to contact this office at 501.682.0625.

Allen Gilliam  
ADEQ State Pretreatment Coordinator

NPDES PERMIT FILE  
 NPDES # AR0036692  
 AFIN # 57-00042  
 Permit PN  
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 ✓ Correspondence  
 \_\_\_\_\_  
 Technical Backup  
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 Date Scanned  
4/22/09

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

**From:** Gilliam, Allen  
**Sent:** Friday, April 10, 2009 3:00 PM  
**To:** 'Richard Hexamer'; 'sales@hotrodlane.cc'  
**Subject:** RE: Street & Performance Quarterly Reports (ARP001057) for discharge to Mena's POTW (AR0036692)

Thanks Shani and Richard,

I'll have to talk to Richard to make sense out of some of the analyticals he sent. I can't tell if the analysis are of wastewater discharged to the city or a sample of wastewater sent to Conventya for each individual treatment plan before discharge.

I can not find a TTO (total toxic organics) scan. The list of pollutants can be located in 40 CFR 433.11 but it is only mentioned as "TTO" in the permit from the city with a limit of 2.13 mg/l. See [http://www.access.gpo.gov/nara/cfr/waisidx\\_98/40cfr433\\_98.html](http://www.access.gpo.gov/nara/cfr/waisidx_98/40cfr433_98.html) for the entire 40 CFR 433 requirements and standards.

All 40 CFR 433.17 parameters must be tested prior to discharge to the City of Mena. The TTO "parameter" sampling can be waived once a toxic organic management plan (TOMP) is submitted and approved. EPA guidance in drafting a TOMP can be located at [http://www.ci.austin.tx.us/water/downloads/wwwssd\\_iw\\_tompguidance.pdf](http://www.ci.austin.tx.us/water/downloads/wwwssd_iw_tompguidance.pdf) . This TOMP or

set of best management practices, once approved, must be followed daily at your facility to be granted a waiver of this expensive testing.

Richard, I will try to reach you on the phone later next week.

<http://www.adeg.state.ar.us/techsvs/labcert.asp> is the site you can go to, to choose a lab certified by ADEQ. Conventya is not one of them although it is perfectly acceptable to use their services for individual treatment plans since they're your chemical supplier.

Since the City and you have agreed to quarterly sampling, please find attached the reporting form which you'll need to send to this office's attention.

Thank you for your cooperation in coming into compliance with the Federal Pretreatment Regulations,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

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

**From:** Street & Performance [mailto:sales@hotrodlane.cc]

**Sent:** Wednesday, April 08, 2009 6:10 PM

**To:** Gilliam, Allen

**Subject:** Mena Wastewater treatment

*Here are the pages from Richard on our water testing.*

*Thanks  
Shani*