

## Henderson, Katie

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**From:** Gilliam, Allen  
**Sent:** Tuesday, August 14, 2012 11:07 AM  
**To:** magnolia russell thomas  
**Cc:** Henderson, Katie; Uyeda, Craig; Shafii, Mo  
**Subject:** AR0043613\_Magnolia Pretreatment Program Audit Response reply\_20120807

Russell,

Your response to the City's Pretreatment Program Audit's required and recommended actions was received and reviewed.

The responses given for the required actions were deemed adequate with the following comments and conditions:

- 1) "Elements of a Pretreatment Program, Identification of Industrial Users". Please submit your master (summarized) list of non-domestic users to this office by 10/30/12. You've stated the surveys would be sent out by 8/30/12;
- 2) "Administrative Procedures". Please submit a template of the permit you intend to issue to your significant users by 10/30/12. This office may be able to provide an updated template with the latest permit requirements to you;
- 3) "General". From this office's viewpoint, your Pretreatment Program is already "on-line". Your monitoring/sampling/inspections (minimum of once/yr) procedures should already be in place and on-going for at least the two (2) at-this-time known significant industrial users: Everette Plating and Southern Aluminum;
- 4) "Ord. #95-12, Sec. 3.2: Accidental Discharge/Slug Control Plans". You've been provided with an adequate slug discharge potential evaluation form. Yes, until the City's old Pretreatment Ordinance is revised, the City must conduct these slug discharge potential evaluations at least once per two years;
- 5) "Ord. #95-12, Sec. 10.0 Publication of Users in Significant Non-Compliance (SNC) of the Pretreatment Program". You've seen all of the correspondence between Southern Aluminum and this office. They have been and are still in SNC. Your Program is in affect by Magnolia's NPDES requirements. Please submit a copy of this publication to this office by 10/30/12.
- 6) "Wastewater Discharge Permits", Section 6.1 "Permit Applications". Please submit permit applications to this office by 10/30/12 for the two (2) currently known significant industrial users; Everette Plating and Southern Aluminum; and
- 7) Please submit a reasonable time-frame to this office by 9/30/12 when the remaining Ordinance revisions can be adopted.

Thank you for your attention to the above matters and if there are any questions, comments or concerns please feel to contact this office.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Mo Shafii, Assistant Water Division Chief  
Craig Uyeda, NPDES Enforcement Branch Manager