

Gilliam, Allen

From: Gilliam, Allen
Sent: Monday, November 14, 2011 11:16 AM
To: 'bniswonger@indmetalfinishings.com' (bniswonger@indmetalfinishings.com)
Cc: 'wrcww@att.net'
Subject: AR0046566_Industrial Metal Finishing #1 (ARP001023) Oct 2011 Semi-Annual Pretreatment Report Reply_20111110

Brian,

Your (IMF #1) October 2011 Semi-Annual Pretreatment Report was received, reviewed, deemed complete and compliant (see below [Note]) with the Federal Pretreatment Regulations in 40 CFR 403 and more specifically the Metal Finishing Standards in 40 CFR 433.17. No further action is deemed necessary at this time.

[Note: Your report indicated an exceedance (2.6 mg/l) of the Zinc monthly average on 10/13/11. This office's two (2) grab samples taken during the same month (Industrial Metal Finishing #1's Compliance Assurance Visit on 10/18/11) were analyzed by ADEQ's laboratory showing 0.784 mg/l and 0.503 mg/l for Zinc.

In determining compliance ALL measurements taken for the same pollutant parameter during that month will be taken into account for the monthly average. Thus, your October monthly average equals 1.30 mg/l which is compliant with the Metal Finishing Monthly Average limit of 1.48 mg/l.]

Recommendations would be to split your samples between two (possibly three) separate certified labs to ascertain their level of deviation for Zinc. Asking the lab for their sample duplicate results would be another recommendation.

Your HACH meter could be of great value to you if a correlation could be established between its "readings" for Zinc and a certified lab's results. This could be accomplished over a relatively short period of time depending on how often you might wish to test for Zinc, your most troublesome parameter. Your HACH meter could be used as an early warning system prior to sending samples to a certified lab analyzing your wastewater using EPA's approved methods in 40 CFR 136 which have to be reported to ADEQ.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Lester Herring/Wastewater Manager/Walnut Ridge City Wastewater Department

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