

Peltier, Hannah

Subject: Request for Sampling Waiver - Helena Industries, Inc. (AR0022756)
Attachments: Waiver of Sampling.pdf

From: REW [<mailto:rew@ftn-assoc.com>]
Sent: Thursday, November 13, 2014 4:36 PM
To: Benefield, Ryan
Cc: 'Brister, Edward'; rnr@ftn-assoc.com; Fuller, Kim
Subject: Request for Sampling Waiver - Helena Industries, Inc. (AR0022756)

Mr. Benefield,

On behalf of Helena Industries, Inc., please find attached a request for a temporary waiver of sampling requirements for the NPDES permit renewal for Helena's West Helena facility (AR0022756). As explained in the waiver request, Helena was unable to submit the requisite analytical data by the submittal deadline (October 31, 2014) due to various circumstances. Samples for the required parameters have since been collected and results will be forwarded to ADEQ as soon as they become available. However, a temporary waiver of the sampling requirements retroactive to the submittal deadline is needed so that the application can be deemed complete as of the submittal deadline and the current permit can be administratively extended beyond the expiration date if necessary.

We appreciate your consideration of this request. Should you have any questions, please feel free to contact me or Rex Robbins, PE, at 501-335-7779.

Kindest regards,
Ray



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HELENA INDUSTRIES, INC.

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Phone: (901) 820-5700

November 13, 2014

Mr. Ryan Benefield
Interim Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Request for Temporary Waiver of Sampling Requirements
Helena Industries, Inc. NPDES Permit Renewal
NPDES Permit AR0022756; AFIN 54-00009

Dear Mr. Benefield:

National Pollutant Discharge Elimination System (NPDES) Permit AR0022756 for the Helena Industries, Inc. (Helena) facility in West Helena, Arkansas, will expire on April 30, 2015. Helena submitted an application for renewal of NPDES Permit AR0022756 via email to ADEQ Water Division on October 31, 2014.

Helena's renewal application requires EPA Form 2F which includes the reporting of certain analytical data for stormwater discharges from Outfall 001. During the summer and early fall of 2014, Helena implemented various source controls to reduce toxicity in Outfall 001 effluent. Helena delayed sampling Outfall 001 as late as possible so that the collected sample would be more representative of discharges after the effects of the newly implemented source controls were realized. Helena did collect stormwater samples for the requisite parameters in advance of the submittal deadline. However, UPS failed to deliver the samples on schedule, and they did not reach the contract laboratory within required holding times. Helena attempted to collect replacement samples, but another stormwater discharge did not occur prior to the submittal deadline. A stormwater discharge has occurred at Outfall 001 since the submittal deadline and replacement samples have been collected and sent to the contract laboratory.

Helena is aware that the submitted application is incomplete without the required analytical data. According to 40 CFR 122.6, a complete application for permit renewal must be submitted at least 180 days prior to permit expiration in order to administratively extend permit coverage if a renewed permit is not in effect prior to the expiration date.

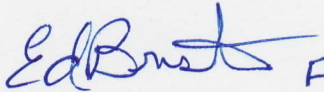
Helena continues to evaluate options to further reduce effluent toxicity. Given the time required to evaluate and design the modifications, the potential impacts the modifications may have on the permit, and the anticipated time required for the permit renewal process, it is anticipated that a renewed permit will not be in effect prior to the expiration date of the current permit. As such, it is important to

Helena that the application submitted on October 31, 2014 be deemed complete so that the current permit may be administratively extended beyond the expiration date.

In accordance with 40 CFR 122.21(g)(7)(iv), Helena hereby requests a temporary waiver of the Form 2F sampling requirements retroactive to the submittal deadline of October 31, 2014. As mentioned above, the required samples have already been submitted to the laboratory. The results will be forwarded to ADEQ as soon as they become available.

Should you have any questions, please contact Ed Brister at 901-537-8600.

Respectfully submitted,
HELENA INDUSTRIES, INC.



Ed Brister For;

Phil Hollis
President and CEO

cc: Kim Fuller, ADEQ Water Division

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