

# Metal Products and Machinery

40 CFR 438

Notice of Data Availability

King County Comment

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# King County Metal Finishers

- 58 metal finishers and circuit board shops
- 12 are 413 but 3 are zero discharge
- General decline in volume and number of dischargers

# King County Comments

- Prefer no additional regulation
- 433 upgrade alternative second choice
- Increase exemption for all to at least 25,000gpd
- Simplify-fewer categories-fewer parameters
- Place cleaning only operations in oil subcategory
- Monitoring flexibility for POTW as well as IU
- EMS not feasible.

# King County Comments-1

- No additional regulations
  - Local limits protect treatment plant
  - Hazardous waste outreach and P2 more effective than command and control
  - Local limits as strict except for zinc, silver, cyanide and molybdenum

# King County Comments-2

- 433 upgrade second choice
  - Require new permits for 12 -\$24,000
  - Additional cyanide monitoring
  - ✓ Simplify limit administration
  - ✓ Remove four day average
  - ✓ No real reduction in metal load
  - ✓ Eliminates proposed Mo limits

# King County Comments-3

- Classify few companies as categorical
  - Raise flow exclusion to 25,000 gpd
    - » 23 % of 413/433 companies don't need treatment
  - Move iron phosphate coaters to oily sub category
    - » No pollutants of concern

# King County Comment-4

- Fewer Categories & Eliminate Parameters
  - Put all circuit board shops into one category
  - Remove tin and manganese
  - Coordinate molybdenum with biosolids regs & treatment alternatives
  - No zinc subcategory needed
    - » \$76,000 to process violations but no impact on zinc load at treatment plant
  - Production based = administrative nightmare

# King County Comment-5

- Monitoring flexibility for POTW
  - Eliminate monitoring if BMR and application show no potential for discharge
  - Could save KC 23% on monitoring costs
  - Organic monitoring only for those present
  - Don't use TOC as surrogate for organics

# King County Comment - 6

## ■ EMS not Feasible

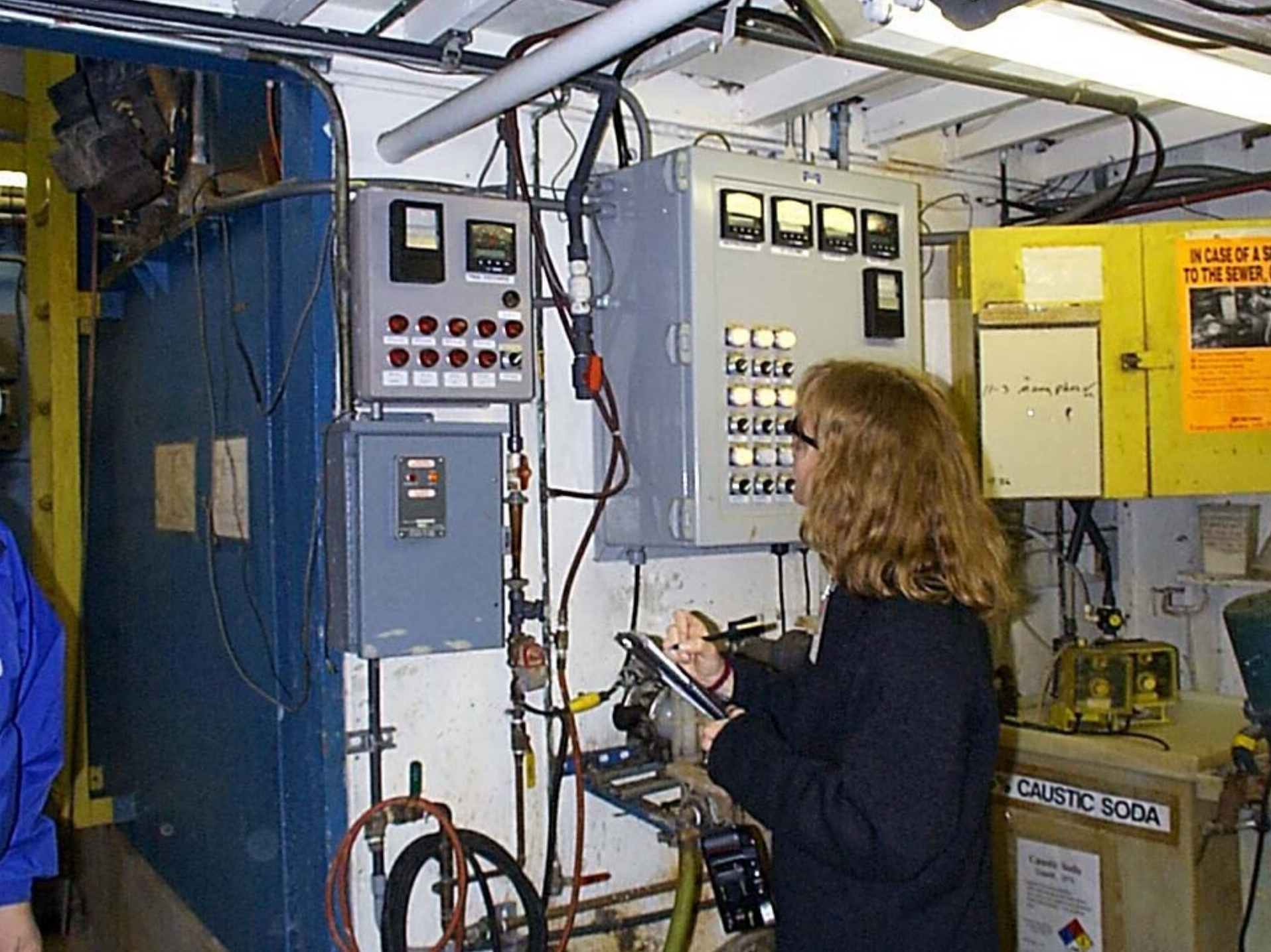
- Unreasonable burden on POTW to make forfeiture determinations
- What is an adequate EMS?
- Minor violation leads to major consequence
- Six months not enough time to comply
- No monitoring reduction for POTW



E201C

LABORATORY EQUIPMENT

NEED To Press Air



## Limits Comparision

