



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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EPA REGION VIII
HEARING CLERK

Ref: 8ENF-W-NP

OCT 30 2017

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Monte Paddleford
President
Eagle Bronze, Inc.
P.O. Box 1100
Lander, Wyoming 82520

Re: Approval of Eagle Bronze, Inc.'s Discharge Control Plan, Docket No. CWA-08-2015-0018

Dear Mr. Paddleford:

On July 29, 2016, the EPA received Eagle Bronze, Inc.'s (Eagle Bronze's) updated June 30, 2016 "Solvent Management Plan." Part II.G.1 of Attachment 1 to the June 11, 2015 Eagle Bronze's CWA-08-2015-0018 Administrative Order on Consent (Order) allows a total toxic organics (TTO) certification statement to be submitted in lieu of sampling for TTOs, if it contains specific solvent management information and is approved by EPA, and states:

"If the Industrial User wishes to submit the TTO certification statement in lieu of sampling (see Part II.C of this attachment), the Industrial User shall submit to EPA a Discharge Control Plan that includes the following, which must be approved by EPA before the certification statement can be submitted in lieu of sampling:

- a. The toxic organic compounds used;
- b. The method of disposal of toxic organic compounds used instead of dumping, such as reclamation, contract hauling, or incineration; and
- c. Procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater."

EPA has reviewed Eagle Bronze's June 30, 2016 "Solvent Management Plan" and with this letter approves the document. Eagle Bronze may now submit the TTO certification with each periodic compliance report going forward in lieu of sampling.

Please remember if Eagle Bronze, Inc. is certifying in lieu of sampling for TTOs, as allowed by Parts II.C and II.G.1 of the Attachment 1 of the Order, the following TTO certification statement must be included and signed by an authorized person listed in Part III.B of the attachment:

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the permitting [or control] authority.

Please note that any changes to the June 30, 2016 "Solvent Management Plan" must be submitted to the EPA for approval. If you have any questions regarding this letter, the most knowledgeable person on my staff is Emilio Llamozas, who may be reached at (303) 312-6407 or llamozas.emilio@epa.gov.

Sincerely,



Suzanne J. Bohan
Assistant Regional Administrator
Office of Enforcement, Compliance
and Environmental Justice

cc: Missy Haniewicz, EPA Region 8, 8RC