### Wilson, Tabatha

From: Gilliam, Allen

**Sent:** Tuesday, April 01, 2014 12:58 PM **To:** Chuck.Jones@danfoss.com

**Cc:** Fuller, Kim; Wilson, Tabatha; mary.clergit@urs.com; bcgills@cityofarkadelphia.com **Subject:** AR0020605\_Danfoss ARP001040 March 2014 semi annual Pretreatment report with

ADEQ reply denoting compliance undeterminable\_20140401

**Attachments:** 20140401070706444.pdf; 0748\_001.pdf; BMR Metal Finishing Form 2014.doc

### Chuck,

Danfoss' March 2014 semi-annual Pretreatment report was electronically received, reviewed, but compliance with its Metal Finishing standards in 40 CFR 433.17 cannot be determined without further information.

Please submit the certified lab's analytical results (which would include a toxic organics scan per 40 CFR 433.11[e] since Danfoss has not submitted an approvable toxic organic management plan [TOMP] per 40 CFR 433.12[a]), the chain of custody for all samples analyzed and the basis for the use of the combined wastestream formula (CWF) per 40 CFR 403.6(e)(1)(i).

This office cannot locate the rationale for the alternate concentration limits because of flow from a dilute wastestream. One piece of e-correspondence from Rufus Torrence dated 5/7/10, did indicate a dilution flow from a storm water source. Danfoss' file does include a very general wastewater flow diagram ("Submitted with Sep 2002 SAR" hand-written by Rufus Torrence) showing a dilution stream (source unidentified) of 360 gpd.

A later semi-annual report (9/13) indicated this dilution stream was 50 gpd. These dilution flows cause the "dilution factor" to be so close to 1.0, this office would deem it negligible and not necessary to calculate leaving Danfoss' limits to those as specified in 40 CFR 433.17. If a dilution flow makes up >2% of the regulated flow <u>during the day of sampling</u> the CWF should be used when the stormwater is commingled with the regulated wastewater.

Danfoss should also consider installation of a calibratable flow measuring device for at least its regulated flow.

To bring Danfoss' required Federal Pretreatment reporting requirements "up-to-speed" and current, per 40 CFR 403.12(b):

"Reporting requirements for ...industrial users. Reporting requirements for [Danfoss] upon effective date of categorical pretreatment standard—baseline report [BMR]. ...[Danfoss which is] subject to [a] categorical Pretreatment Standard and currently discharging to a POTW shall be required to submit to [ADEQ] a report which contains the information listed in paragraphs (b)(1)-(7) of this section. At least 90 days prior to commencement of discharge, New Sources, and sources that become Industrial Users subsequent to the promulgation of an applicable categorical Standard, shall be required to submit to [ADEQ] a report which contains the information listed in paragraphs (b)(1)-(5) of this section. New sources shall also be required to include in this report information on the method of pretreatment the source intends to use to meet applicable pretreatment standards. New Sources shall give estimates of the information requested in paragraphs (b) (4) and (5) of this section:

- (1) Identifying information. The User shall submit the name and address of the facility including the name of the operator and owners;
- (2) Permits. The User shall submit a list of any environmental control permits held by or for the facility;
- (3) Description of operations. [Danfoss] shall submit a [comprehensive] description of the nature, average rate of production, and Standard Industrial Classification [and NAICS] of the operation(s) carried out by [Danfoss]. This description should include a [comprehensive] schematic process diagram which indicates points of Discharge [sampling point] to the POTW from the regulated processes.
- (4) Flow measurement. [Danfoss] shall submit information showing the measured average daily and maximum daily flow, in gallons per day, to the POTW from each of the following:
- (i) Regulated process streams; and
- (ii) Other streams as necessary to allow use of the combined wastestream formula of §403.6(e)....
- (5) Measurement of pollutants. (i) The user shall identify the Pretreatment Standards applicable to each regulated process; and
- (6) Certification. A statement, reviewed by an authorized representative of [Danfoss] (as defined in paragraph (I) of this section) and certified to by a qualified professional, indicating whether Pretreatment Standards are being met on a consistent basis, and, if not, whether additional operation and maintenance (O and M) and/or additional Pretreatment is required for [Danfoss] to meet the Pretreatment Standards and Requirements..."

See the  $3^{rd}$  attachment for a blank BMR to save on your hard drive. Please save this original and rename them for subsequent semi-annual reports. Please attach additional sheets where space is limited and attempt to place the comprehensive wastewater flow schematic on 8 &  $\frac{1}{2}$  X 11" sheets of paper preferably with work piece and wastewater flow directional arrows. These do not have to be to scale, but should be laid out in which they are on the process floor. A good example schematic is attached (the  $2^{nd}$ ) for your convenience.

If there are further questions, comments or concerns please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Brenda Gills, Arkadelphia Utilities Manager Mary Clergit, URS Consultant to Danfoss

E/NPDES/NPDES/Pretreatment/Reports

----Original Message-----

From: Jones Chuck [mailto:Chuck.Jones@danfoss.com]

Sent: Tuesday, April 01, 2014 7:14 AM

To: Gilliam, Allen Subject: FW:

# Semiannual report

Gung Ho!

Chuck Jones NREMT-P

Environmental, Health and Safety Manager Danfoss LLC One Scroll Drive Arkadelphia, AR 71923

E-mail: chuck.jones@danfoss.com

Tel.: 870-246-0714 Fax: 870-245-0150 http://www.danfoss.com

### SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433/403.6(e)

Use of this form is not an EPA/ADEQ requirement. Attn: Water Div/NPDES Pretreatment (1) IDENTIFYING INFORMATION A. LEGAL NAME & MAILING ADDRESS FACILITY & LOCATION ADDRESS Danfoss LCC Danfoss LCC One Scroll Drive Arkadelphia AR 71923 One Scroll Drive Arkadelphia AR 71923 C. FACILITY CONTACT: Chuck Jones TELEPHONE NUMBER: 870-246-0714 (2) REPORTING PERIOD-FISCAL YEAR From March 1 to Feb 28/29 (Both Semi-Annual Reports must cover Fiscal Year) B. PERIOD COVERED BY THIS REPORT A. MONTHS WHICH REPORTS ARE DUE FROM: 09/1/2013 TO: 3/1/2014 September\_ & \_\_\_\_March\_ (3) DESCRIPTION OF OPERATION A. REGULATED PROCESSES B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE. CORE PROCESS(ES) CHECK EACH APPLICABLE BLOCK ☐ Electroplating ☐ Electroless Plating ☐ Anodizing Mar 2014 SAR X Coating ARP 001040 ☐ Chemical Etching and Milling AR0020605 ☐ Printed Circuit Board Manufacture AFIN 10-00102 Filed Date 2014 03 28 ANCILLARY PROCESS(ES)\* LIST BELOW EACH PROCESS USED IN THE FACILITY Cleaning Machining \_\_\_\_\_ Grinding Painting C. Number of Regular Employees at this facility\_195 D. [Reserved]

# 40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME:

# (4) FLOW MEASUREMENT

INDIVIDUAL &TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY (GPD)

Process	Average Flow	Maximum Flow	Type of Discharge
Regulated (Total)	18142	62100	Continuous
Regulated (Cyanide)	18142	62100	Continuous
§403.6(e) Unregulated*	0	0	N/A
§403.6(e) Dilute	50	1000	Batch
Cooling Water	0	0	Continuous
Sanitary	5800	10150	Continuous
Total Flow to POTW	23942	72250	********

	"Unregulated" has a precise l	egal meaning; s	see 40CFR403	.6(e).						
(5)	MEASUREMENT OF PO	LLUTANTS	3							
А. Т	YPE OF TREATMENT SYSTEN	1					В.	COMMENTS	ON TREATM	ENT SYSTEM
СНЕ	CK EACH APPLICABLE BLOC	СК								
$\square$ N	[eutralization									
ХC	hemical Precipitation and	Sedimentatio	on							
	hromium Reduction									
	yanide Destruction									
	other									
$\square$ N	lone									
ANC ANA	THE INDUSTRIAL USER MUSTLLARY(AFTER TREATMEN LLYTICAL DATA COLLECTED EPTABLE; LIST THE DETECT	NT, IF APPLICA DURING THI	ABLE). ATTA E REPORT PE	ACH THE LA ERIOD IN TH	B ANALYSIS E SPACE PRO	S WHICH SHO OVIDED BEL	OWS A MAX OW. ZERO	IMUM; TABU	JLATE ALL T	HE
	Pollutant (mg/l)	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*
	MAC	0.108	2.731	3.332	0.68	3.924	0.424	2.573	1.183	2.1
	AAC	0.069	1.686	2.041	0.424	2.346	0.237	1.459	0.641	***
	AMMC	.0.0040	0.0032	0.0100	0.0045	0.0745	0.0001	0.704	0.0130	1.000
	AMAC	0.0010	0.00141	0.0140	0.00240	0.0475	0.0009	0.13406	0.0052	
_	MAC <=> Max Alternate Conc									
	Sample Type (Grab or Co	mposite)	Composite							
	Number of Samples and F	requency Co	ollected6	Samples @	) 1 per mon	th				
	40CFR136 Preservation a	nd Analytica	l Methods 1	Use: X Ye	s 🗆 No					

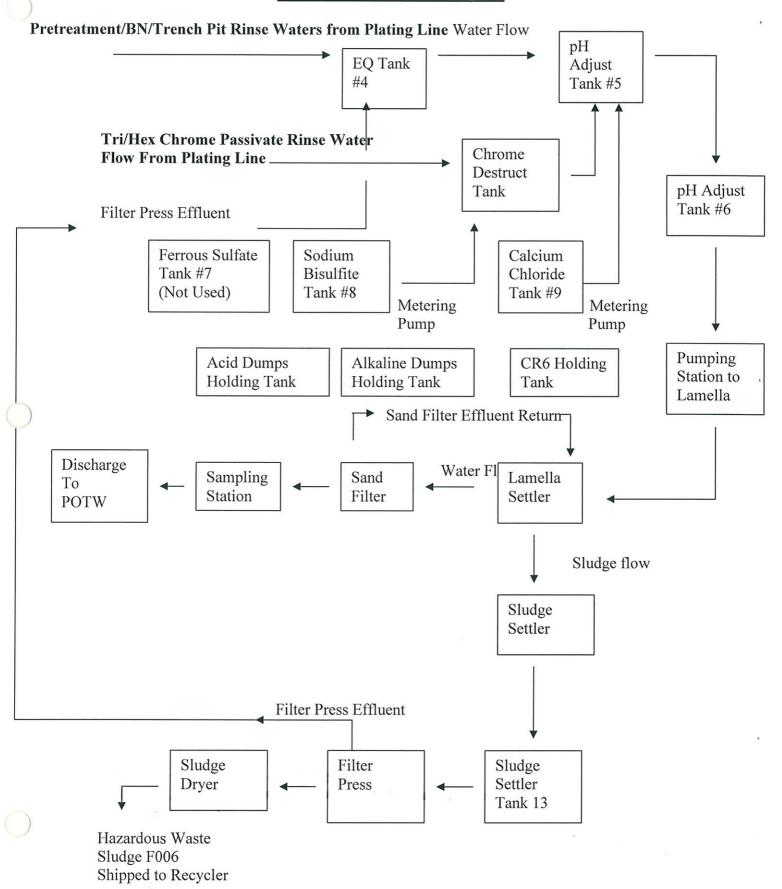
40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: (6) CERTIFICATION A. [Reserved] [Reserved] B. CHECK ONE: ☐ §433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED ☐ §433.12(a) TTO CERTIFICATION PROVIDED BELOW Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment 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 semi-annual compliance report. I further certify that this facility is implementing the toxic organic management plan submitted to Arkansas Department of Environmental Quality. (Typed Name) (Corporate Officer or amborized representative) Date of Signature \_ CORPORATE ACKNOWLEDGEMENT (Optional) STATE OF ARKANSAS COUNTY OF Before me, the undersigned authority, on this day personally appeared of a corporation, known to me to be the person whose name is subscribed to the foregoing instrument(s), and acknowledged to me that he executed the same for purposes and considerations therein expressed, in the capacity therein stated and as the act and deed of said corporation. \_day of \_\_\_\_ Given under my hand and seal of office on this \_ Notary Public in and for \_ County, Arkansas My commission expires \_

# 40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME:

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]
\$6602 [42 U.S.C. 13101] Findings and Policy para (b) PolicyThe Congress hereby declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.
The User may list any new or ongoing Pollution Prevention practices:
We continue to use mechanical separation of oil and grease prior to pre-treatment.
(8) GENERAL COMMENTS
N/A
(9) SIGNATORY REQUIREMENTS [40CFR403.12(l)]
I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.
T.Paul Dean
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE SIGNATURE
General Manager         3/31/2014           OFFICIAL TITLE         DATE SIGNED



### Virco Waste Treatment Diagram



# **Plater Process Tanks 1-9**



### Tank #1

Name: Soak Cleaner (NAOH Based) Volume (gal):5504

Temp:175

Typical Ph: 12+

Agitation: Mechanical Flow Pattern: None WWT: To Alkaline Dumps Holding Tank

### Tank #2

Name: Soak Cleaner

Rinse

Volume(gal): 1800 Temp: Ambient Typical Ph: 9+ Agitation: Air

Flow Pattern: To cleaning

cycle pretreatment pumping station then to WWT (EQ Tank #4).

### Tank #3

Name:#1 Electro-Cleaner

(NAOH Based) Volume(gal): 3534

Temp: 175

Typical Ph: 12+ Agitation: None Flow Pattern: None WWT: To Alkaline Dumps Holding Tank

### Tank #4

Name: EC Rinse Volume (gal): 1800 Temp: Ambient Typical Ph: 7 Agitation: Air

Flow Pattern: To cleaning

cycle pretreatment pumping station then to WWT (EQ Tank #4).

### **Tank #5**

Name:#2 Electro-Acid (H2SO4 based w/ Flouride)

Volume(gal): 3534

Temp: 120 Typical Ph: 1.5

Agitation: Mech./Filtered

Flow Pattern: None WWT: To Acid Dumps

Holding Tank

### Tank #6

Name: Acid Rinse Volume(gal): 1800 Temp: Ambient Typical Ph: 8 Agitation: Air

Flow Pattern: To cleaning

cycle pretreatment pumping station then to WWT (EQ Tank #4).

### Tank #7

Name: Electro-Cleaner

(NAOH Based) Volume (gal): 3534

Temp: 175
Typical Ph: 12+
Agitation: None
Flow Pattern: None
WWT: To Alkaline
Dumps Holding Tank

### Tank #8

Name: 2<sup>nd</sup> EC Rinse Volume (gal): 1800 Temp: Ambient Typical Ph: 8 Agitation: Air

Flow Pattern: To cleaning

cycle pretreatment pumping station then to WWT (EQ Tank #4).

### Tank #9

Name: #2 Acid (H2SO4 based w/

flouride)

Volume (gal): 7012

Temp: 130 Typical Ph: 1.5

Agitation: Mech./Filtered

Flow Pattern: None WWT: To Acid Dumps

Holding Tank

# Plater Process Tanks 10-18



### **Tank #10**

Name: Sour Dip Rinse (H2SO4 Based) Volume (gal):1800 Temp: Ambient Typical Ph: 1.5

Agitation: Air/Filtered Flow Pattern: Stagnant WWT: To pit below plater then to WWT (EQ Tank

#4).

### **Tank #11**

Name: Sour Dip Rinse (H2SO4 Based) Volume(gal): 1800 Temp: Ambient Typical Ph: 1.5

Agitation: Air/Filtered Flow Pattern: Stagnant WWT: To pit below plater then to WWT (EQ Tank

#4).

### **Tank #12**

Name: Bright Nickel Plate Volume(gal): 16191

Temp: 145 Typical Ph: 4

Agitation: Air/Filtered Flow Pattern: None

### **Tank #13**

Name: BN Dragout Rinse Volume (gal): 1800 Temp: Ambient Typical Ph: 5 Agitation: Air Flow Pattern: Source of

H2O replenishment for the BN tank #12.

### **Tank #14**

Name: BN Rinse (From

Tank #15)

Volume(gal): 1800 Temp: Ambient Typical Ph: 6 Agitation: Air Flow Pattern: To pretreatment pumping station then to WWT (EQ Tank #4).

### **Tank #15**

Name: BN Rinse (From

Tank #16)

Volume(gal): 1800 Temp: Ambient Typical Ph: 6 Agitation: Air

Flow Pattern: Counter flow to tank #14.

### **Tank #16**

Name: BN Rinse (From

Tank #17)

Volume (gal): 1800 Temp: Ambient Typical Ph: 6 Agitation: Air

Flow Pattern: Counter flow to tank #15.

**Tank #17** 

Name: BN Rinse (Fresh

H2O Makeup) Volume (gal): 1800 Temp: Ambient

Typical Ph: 7 Agitation: Air

Flow Pattern: Counter flow to tank # 16.

**Tank #18** 

Name: Trivalent Chrome

Plate

Volume (gal): 7183

Temp: 115 Typical Ph: 4

Agitation: Air/Filtered Flow Pattern: None

# Plater Process Tanks 19-23



### **Tank #19**

Name:CR3 Rinse (From Tank #21) Volume (gal):1800 Temp: Ambient

Typical Ph: 5 Agitation: Air

Flow Pattern: To Chrome pumping station then to WWT (Chrome Destruct

Tank).

### **Tank #20**

Name: Hex Chrome

Passivate

Volume(gal): 1800 Temp: Ambient Typical Ph: 4 Agitation: Air

Flow Pattern: Stagnant WWT: To CR6 pumping station then to CR6 Holding Tank for CR6.

chrome destruct.)

### **Tank #21**

Name: CR6 Rinse (From

Tank # 22)

Volume(gal): 1800 Temp: Ambient Typical Ph: 5 Agitation: Air

Flow Pattern: Counter flows to tanks #19.

### Tank #22

Name: Rinse (Fresh H2O

Makeup)

Volume (gal): 1800 Temp: Ambient Typical Ph: 6 Agitation: Air

Flow Pattern: Counter flows to tank #21.

### Tank #23

Name: Hot Water Rinse

Volume(gal): 1800

Temp: 180+ Typical Ph: 7

Agitation: Air/Filtered Flow Pattern: Stagnant WWT: Pretreat for CR6 in

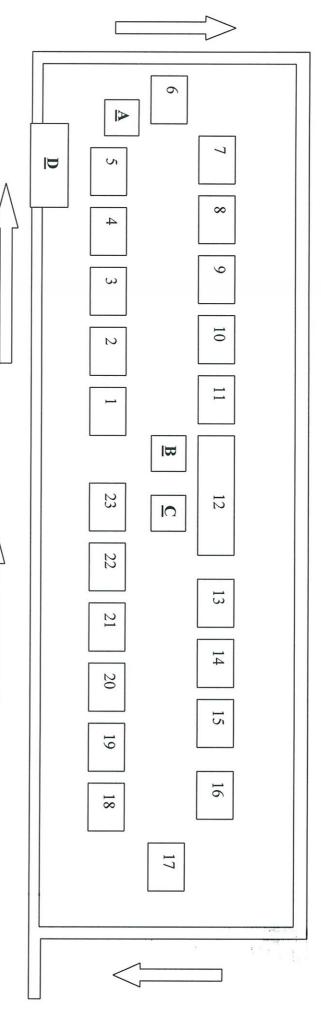
tank w/ Sodium

Hydrosulfite then to pit below plater for transfer to WWT (EQ Tank #4).

**Updated: 3/24/09** 



# VIRCO PLATING LINE DIAGRAM



# Process Tank Description/Flow Routing

- 4. #1 Electrocleaner Rinse/A 10. #1 Sour Dip Rinse/D 6. 5. #1 Electro-Acid/F 3. #1 Electrocleaner/E #1 Electro-Acid Rinse/A 12. Bright Nickel Plating 11. #2 Sour Dip Rinse/D
  - 9. #2 Acid/F
    - 8. #2 Electrocleaner Rinse/A 14. C-F Rinse/From #15

7. #2 Electrocleaner/E

2. Soak Cleaner Rinse/A

Soak Cleaner/E

- 16. 17. C-F Rinse/To #16 C-F Rinse/From #17

23. Hot Water Rinse/D 22. C-F Rinse/To #21 21. C-F Rinse/From #22 20. Hex Chrome Passivate/G 19. C-F Rinse/From #21

G. To Hex Chrome Holding Tank (WWT)

- 18.
- 13. Bright Nickel Dragout/To #12
- 15. C-F Rinse/From #16
- Trivalent Chrome Plate
- D. Trench Pit

A. Cleaning Cycle Pretreatment Pumping Station

Tri/Hex Chrome Pumping Station **Bright Nickel Rinse Pumping Station** 

- E. To Alkaline Dumps Holding Tank (WWT)
- F. To Acid Dumps Holding Tank (WWT)

# ADEQ BASELINE MONITORING REPORT [BMR]

(for Metal Finishers under 40 CFR 433)

<u>Instructions</u>: In accordance with 40CFR403.12(b) Industrial Users subject to categorical Pretreatment Standards are required to submit to ADEQ a report which contains the information in paragraphs (b)(1)-(7). The User is responsible for submitting a complete and accurate report. The User must complete this form in as much detail as possible. Include additional information on attached sheets as necessary where space is limited.

A. Legal Name:		
Mailing Address:		
		Zip:
B. Facility Name:		
Location:		Zip:
C. Name of Owners: Address:		
D. Name of Pretreatment Sy		Class:
		Class: Class:
E. Facility Signatory Author	ty / Title:	/
Phone number:	nce contact / Title: Cell #:	/
G. Number of Employees: _	Number of Shifts:	
H. Number of Months per Ca	alendar Year which Plant normally op	perates:
		that receives the wastewater discharges from sewerage system describe where that wastew

CFR 433 BMR rev 4/1/14 Page 1

### (2) <u>User's Permits</u> [§403.12(b)(2)]:

Describe all environmental control permits held by or for the facility:

Describe Title of the Permit	Permit No.	Issuing Office or Agency	Exp. Date
		Agency	

A. List	Basis Metals Used:
	Chemicals (attach first page of their MSDS if necessary [not trade names]) used in regulated procesunts, acids, caustics, aqueous cleaners, machining oils/lubricants/coolants, etc.) and their use/at what
	de a <u>Comprehensive Narrative Description</u> of the facility's wastewater activities/processes or othe ities conducted and the Final Products (attach a separate sheet if necessary):

See Section E. below. A, B & C above can be submitted on separate sheets of paper. These do not have to be to-scale and can be hand drawn, preferably with a separate (numbered) legend for separate process/pretreatment tanks, etc. This numbered legend page can then describe what chemicals and process is being performed without further complicating the schematic.

D. Summarize each Point Source Category <u>Core</u> Process generating wastewater (Electroplating, Electroless Plating, Anodizing, Coating [chromating, phosphating, and coloring], Chemical Etching and Milling, and Printed Circuit Board Manufacture) See 40 CFR 43310(a) @ <a href="http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=40:31.0.1.1.9#40:31.0.1.1.9.1.4.1">http://www.ecfr.gov/cgi-bin/text-idx?rgn=div5&node=40:31.0.1.1.9#40:31.0.1.1.9.1.4.1</a> for applicability):

Core Operation(s)	etreatment Standard gory – 40 CFR 433.17	SIC Code(s)	NAICS Code(s)
List any of the forty (40) "ancillary" operations gregu	wastewater (see 40 CFR 43 er 40 CFR 433)	33.10(a) for thes	e which are also

### E. Provide on separate sheets (if necessary):

- (i) A <u>comprehensive</u> schematic of manufactured parts flow through each regulated process that generates Federally regulated wastewater. These are preferably to be not-to-scale and on 8.5"X11" sheets of paper and can be hand drawn if CAD is not available.
- (ii) A <u>comprehensive</u> schematic drawing showing <u>all</u> wastewater directional flows (regulated and unregulated), location of pretreatment system, sampling locations and flows for each individual wastestream. Show points of discharge to the POTW from regulated processes <u>and sampling point</u>. These do not have to to-scale and can be hand drawn if CAD is not available. Several 8.5" X 11" sheets are preferable to one large facility layout.
- (iii) Denote any Pollution Prevention (P2) practices such as flowlines showing in-situ filtration, counter-current flows, air knives, wet scrubber return water to baths, acid/caustic baths regeneration, etc.
- (iv) Denote chemical storage areas (bulk storage, at work stations, outdoor, etc.)
- (v) Denote any floor drains and containment areas (curbs, secondary containment, below grade grated troughs pumped/gravity-flowed to pretreatment, etc).
- (vi) In lieu of Total Toxic Organic (TTO) monitoring, a Toxic Organic Management Plan (TOMP) may be submitted. Once approved by ADEQ, the following certification statement may be made: `Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation 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 ADEQ."

(4) Flow Measurement [	[§403.12	(b)(	<b>4</b> )]:
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A.	Total Plant Flow in Gallons per Day (gpd	):
	Average	Maximum

{denote all the flows below if measured [M] or estimated [E]}

B. Individual Flows in Gallons per Day <sup>1</sup> (gpd); Dilute wastestreams include non-contact cooling water, sanitary waste, boiler blowdown, etc.	Average Flow Rate <sup>2</sup> (gpd)	Max. Flow Rate (gpd)	Type Discharge <sup>2</sup> and at what frequency (describe)	Discharged to City, hauled off-site or recycled (describe)
Regulated Streams				
Unregulated Streams				
Dilute Streams <sup>3</sup>				
Non-Contact Cooling Water				
Boiler Blowdown				
Sanitary Wastewater				
De-I or R/O backwash				

<sup>&</sup>lt;sup>1</sup>Referring to 40 CFR403.6(e)(1) average flows must be for a 30-day period unless batch discharges are less frequent than monthly.

<sup>&</sup>lt;sup>2</sup>Do not normalize over a period of days if batch discharged; state measured amount per batch and at what frequency). Show type - Continuous, Batch (Monthly, Semi-annually, once per 3 months, 5 days/week, 25 days/30-day period, once per 6 months, etc.)

<sup>&</sup>lt;sup>3</sup> Denote whether any of these streams are combined to the regulated wastestream prior to pretreatment OR prior to the final sampling point. If any of these flows are combined with the regulated wastestream as alluded to above, the MAC and AAC values in Section (5)C. below will have to be calculated.

(5) Measurement of Pollutants in User's Discharge to	POTW [§ 403.12(b)(5)]:
--	------------------------

Α	(i) Cite	Evidence	why th	ne process	wastewater is	subject to	40	CFR	433
71.	(1) CILC	LVIUCIICC	wily u	ic process	wastewater is	subject to	TU		マンン

Core Process:	
Core Process:	
Core Process:	

- (ii) Provide on a separate sheet a comprehensive schematic of all wastewater pretreatment equipment (holding tanks, mixing tanks, chemical injection points, clarifier, sludge holding tank, sludge press/supernatant, flow lines, etc) and wastewater flows direction. Show treatment system location in relation to process flows and sampling points on schematic drawing required in Section 3.E.(ii) above.
- B. Analysis of Regulated Flows: The industrial user must perform sampling and analysis of the effluent from all regulated processes which discharge into the POTW (after pretreatment). Provide the analytical data for the regulated processes in the appropriate space below. If facility's Metal Finishing regulated flow is the only flow that is sampled, the below limits apply.

CONCENTRATION (mg/l)									
40 CFR 433.17 Limits	Pollutant								
	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO**
Maximum daily	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Monthly Average* not to exceed	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	

<sup>\*</sup> Regardless of samples taken/analyzed, these limits must be met at a minimum.

### C. Analysis of Total Plant Flow (Mark each blank "N/A" if not appropriate/applicable)

In accordance with 40 CFR 403.6(e) an industrial user may sample and analyze the total plant flow and calculate an alternate concentration limit using the combined wastestream formula if regulated process flows are mixed with other flows prior to treatment and/or sampling. Record the analytical results for all regulated pollutants below. Record the calculated concentration limits as well as the actual measured concentrations.

CONCENTRATION (mg/l)									
	Pollutant								
	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO
MAC <sup>1</sup>									
$AAC^2$									
AMMC <sup>3</sup>									
AMAC <sup>4</sup>									

- 1 MAC --- Maximum Alternate Concentration as determined by ADEQ. [If facility's Metal Finishing sampled flow is diluted with sanitary wastewater.
- AAC --- Average Alternate Concentration as determined by ADEQ. boiler blowdown or non-contact cooling water, these numbers will have to be calculated per the Combined Wastestream Formula (CWF) in 40 CFR 403.6)]
- 3 AMMC --- Actual Measured Maximum Concentration from Lab results. [Facility's results must include the (ADEQ certified) lab's results & QA sheet
- 4 AMAC --- Actual Measured Average Concentration from Lab results. <u>along with a complete chain of custody</u>}

<sup>\*\*</sup> See http://edocket.access.gpo.gov/cfr 2005/julqtr/pdf/40cfr433.11.pdf for list of Toxic Organics.

D. User Sample Location*:		
*This lo	ocation should be identified on the wastewater flow sc	chematic required in Section 3.E.(ii) above.}
Sample Type (Composite samp	les are required except where not feasible or where gr	rab samples are specifically required)
Number of Samples Taken:	Frequency (Daily, Weekly, etc)	
Analytical Methods Used (Mus	t be in accordance with 40CFR136for example: Met	th. 200.8, 624, 625, etc.)
(6) <u>Certifications</u> [ <b>§403.12(b)(5</b>	5)(viii) & 403.12(b)(6)]:	
40 CFR 403.12(b)(6) Compli	ance Certification	
A. Are applicable categor	rical pretreatment standards being met on a consistent	t basis? YES NO
B. If no, do you require:		
(i) Additional operati	ion and maintenance (O&M) to achieve compliance?	YES NO
(ii) New or additiona	Il pretreatment facilities to achieve compliance?	YES NO
40 CFR 403.12(b)(5)(viii) Re	epresentative Certification  owledge, that the sampling and analysis as shown in S	Section 5 above is representative of the User's
	expected Discharges to the POTW.	F
Print Name:	Signature:	Date:
In accordance with 40CFR403 space below.	3.12(b)(5)(viii) & (6) a qualified professional must co	emplete and sign these certifications in the
Name & Title	Qualified Professional (Please Type or Pr	int)
Signature		
	Date	

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- (7) A. If additional O&M or new or additional pretreatment will be required to meet categorical pretreatment standards on a consistent basis, provide an <u>explanation</u> in an attachment. New sources must not commence discharge until compliance is possible.
  - B. Signatory Requirement [40 CFR 403.12(l)]

40 CFR 403.12(l)(3) Authorizat	tion to Sign Environmental Reports	
responsible for the overall operate reports required by National Pret	the position title of ion of the reatment Standardspursuant to ADEQ rules and/or Clear yided in accordance with 40 CFR 403.12(1) and comparable	, Arkansas, to sign all regular n Water Act (CWA) regulations.
	Corporate official name & title here	
	Signature	
	Date	

40 CFR 403.6(a)(2)(ii) Ce	rtification	
Report and all attachments, information contained in the	aw that I have personally examined and am familiar with the in, and that, based on my inquiry of those persons immediately report, I believe that the information is true, accurate and committing false information, including the possibility of fine and	esponsible for obtaining the nplete. I am aware that there are
	Name of Authorized Representative (Please Type or F	Print)
	Official Title (Please Type or Print)	
	Signature	
	Date	
	TTO Certification Statement	
receive TOMP approval b	ction 3.E.(vi) above, the facility may submit a Toxic Organic Mefore the waiver of TTO monitoring can be granted and the bedaterial can be found at <a <="" href="http://www.epa.gov/npdes/pubs/owm00.gov/npdes/pubs/own00.gov/n&lt;/td&gt;&lt;td&gt;low certification statement can be made. EPA&lt;/td&gt;&lt;/tr&gt;&lt;tr&gt;&lt;td&gt;organics (TTO), I certify tha&lt;/td&gt;&lt;td&gt;e person or persons directly responsible for managing compliant, to the best of my knowledge and belief, no dumping of conceast discharge monitoring report. I further certify that this facilit to ADEQ." td=""><td>entrated toxic organics into the wastewaters has</td></a>	entrated toxic organics into the wastewaters has

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Name of Authorized Representative (Please Type or Print)

Official Title (Please Type or Print)

Signature

Date