

Wilson, Tabatha

From: Gilliam, Allen
Sent: Monday, September 29, 2014 3:56 PM
To: Chuck.Jones@danfoss.com
Cc: Fuller, Kim; Wilson, Tabatha; Arkadelphia - Brenda Gills
Subject: AR0020605_Danfoss ARP001040 Sept 2014 non compliant quarterly pretreatment report with ADEQ reply_20140929
Attachments: 20140929093826623.pdf

Chuck,

Danfoss' September 2014 quarterly report was electronically received, reviewed and deemed not compliant with the reporting requirements per 40 CFR 403.12(e). Danfoss is compliant with the Metal Finishing standards in 40 CFR 433.17, however.

Under Section "(6) Certification (Only if a TOMP [toxic organic management plan] has been submitted/approved by ADEQ)" of Danfoss' quarterly report, you have certified to a TOMP for which Danfoss has not submitted. Apologies for not making note of this on Danfoss' 6/13/14 report where the same mistake was made. [Danfoss must submit an approvable TOMP before this certification can legally be made](http://www.ecfr.gov/cgi-bin/text-idx?SID=b4ebe5d21d63be1ff679116806137a8f&node=pt40.30.433&rgn=div5#se40.30.433_112) (See 40 CFR 433.12 @ http://www.ecfr.gov/cgi-bin/text-idx?SID=b4ebe5d21d63be1ff679116806137a8f&node=pt40.30.433&rgn=div5#se40.30.433_112).

Please reply within five (5) working days that you understand the above issue.

Please take note Danfoss' next quarterly report (due in December) must include sampling and the analysis for the toxic organics in 40 CFR 433.11. As mentioned in this office's e-correspondence dated 6/6/14, only the results page of the organics and the chain of custody are necessary to report. Your contract lab's QA/QC sheets are for you to determine if you are receiving valid results (within certain ranges of variance, etc.).

Thank you for your timely report.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Brenda Gills, Arkadelphia Utilities Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Jones Chuck [<mailto:Chuck.Jones@danfoss.com>]
Sent: Monday, September 29, 2014 9:53 AM
To: bcgills@cityofarkadelphia.com; Gilliam, Allen
Subject: 3rd quarter report

I have attached the quarterly report for your review. If you have any questions please let me know.

Gung Ho!

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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>



Danfoss (www.danfoss.us), is a leading manufacturer of high efficiency electronic and mechanical components and controls for air-conditioning, heating, refrigeration and motion systems.

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 433

Use of this form is not an ADEQ requirement, but satisfies the reporting requirements in 40 CFR 403.12(e).

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION and NPDES Pretreatment Tracking # ARP001040

A. LEGAL NAME & MAILING ADDRESS
 Danfoss LCC
 One Scroll Drive
 Arkadelphia AR 71923

B. FACILITY & LOCATION ADDRESS
 Danfoss LCC
 One Scroll Drive
 Arkadelphia AR 71923

C. FACILITY CONTACT: Chuck Jones **TELEPHONE NUMBER:** 870-246-0714 **e-mail:** chuck.jones@danfoss.com

(2) REPORTING PERIOD--FISCAL YEAR From _____ to _____ (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

3rd Quarter through September 2014

B. PERIOD COVERED BY THIS REPORT

FROM: May **TO:** September

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

CHECK EACH APPLICABLE BLOCK

- Electroplating
- Electroless Plating
- Anodizing
- Coating (conversion)
- Chemical Etching and Milling
- Printed Circuit Board Manufacture

ANCILLARY PROCESS(ES)*

LIST BELOW EACH PROCESS USED IN THE FACILITY

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.

Sept 2014 QR
 ARP 001040
 AR0020605
 AFIN 10-00102
 Filed Date 2014 09 29

*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

C. Number of Regular Employees at this Facility 195

D. [Reserved]

(4) FLOW MEASUREMENT

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

| Process | Average | Maximum | Type of Discharge* |
|------------------------------|--------------|--------------|--------------------|
| Regulated (Core & Ancillary) | | 62100 | Continuous |
| Regulated (Cyanide) | 18142 | 62100 | Continuous |
| ' 403.6(e) Unregulated* | 0 | 0 | N/A |
| ' 403.6(e) Dilute | 0 | 0 | Batch |
| Cooling Water | 0 | 0 | Continuous |
| Sanitary | 5800 | 10150 | Continuous |
| Total Flow to POTW | 23942 | 72250 | ***** |

*If batch discharged please list the period of time of each batch discharge (300 gallons/day; 500 gallons/week, 2,000 gallons/3 months, etc). Do not normalize over that period for the average flow.

"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

Neutralization

Chemical Precipitation and Sedimentation

Chromium Reduction

Cyanide Destruction

Other _____

None

B. COMMENTS ON TREATMENT SYSTEM

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES-- CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

| 40 CFR 433.17 Pollutant(mg/l) limits | Cd | Cr | Cu | Pb | Ni | Ag | Zn | CN | TTO* |
|--|-------|------|------|------|------|------|------|------|------|
| Max for 1 day | 0.11 | 2.77 | 3.38 | 0.69 | 3.98 | 0.43 | 2.61 | 1.20 | 2.13 |
| Monthly Avg | 0.07 | 1.71 | 2.07 | 0.43 | 2.38 | 0.24 | 1.48 | 0.65 | -- |
| Max Measured | .0001 | .026 | .028 | .017 | .778 | .021 | .144 | .011 | * |
| Avg Measured** | .0001 | .026 | .028 | .017 | .778 | .021 | .144 | .011 | * |

Sample Location After Pre-Treatment

Sample Type (Grab* or Composite) Composite

*If Grab, list # of grabs over what period of time

Number of Samples and Frequency Collected 1

40CFR136 Preservation and Analytical Methods Use: Yes No (include complete Chain of Custody)

*If a TOMP has been submitted and approved by ADEQ place N/A.

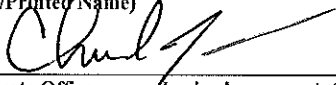
****A value here is the average of all samples taken during one (1) calendar month regardless of number of samples taken. If only one (1) sample is taken it must meet the monthly average limitation.**

(6) CERTIFICATION (ONLY IF A TOMP HAS BEEN SUBMITTED/APPROVED BY ADEQ)

B. CHECK ONE: '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED '433.12(a) TTO CERTIFICATION

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.

Chuck Jones
(Typed/Printed Name)


(Corporate Officer or authorized representative signature)

Date of Signature 9/29/14

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]

'6602 [42 U.S.C. 13101] Findings and Policy para (b) Policy.--The 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 including Best or Environmental Management Practices, Source Reduction, Waste Minimization, Lean Manufacturing, Water and/or Energy Conservaton:

1. We continue to use mechanical separation of oil and grease prior to pre-treatment.
2. _____
3. _____
4. _____
5. _____

(8) GENERAL COMMENTS

(9) SEMI-ANNUAL/PERIODIC REPORT CERTIFICATION STATEMENT REQUIRED UNDER 40 CFR 403.12(i)

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.

 Chuck Jones
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

 EHS Manager
OFFICIAL TITLE

 9/29/14
DATE SIGNED



**SORRELLS RESEARCH
LABORATORY AND FIELD SERVICES**

WEF



CHEMISTS
ECOLOGISTS
CONSULTANTS
PLANNERS

8100 National Drive
Little Rock, Arkansas 72209

Phone 501-562-8139
Fax 501-562-7025
Toll Free 1-800-331-8139

LABORATORY ANALYSIS

Date of Report: September 24, 2014
Date Received : September 3, 2014

For: DANFOSS - SCROLL TECHNOLOGIES
ONE SCROLL DRIVE
ARKADELPHIA, AR 71923-8813

Job: INDUSTRIAL WASTEWATER ANALYSIS / P.O.#8585034

Sample From: EFFLUENT GRAB 09/03/14 / METALS ONLY

| ANALYTE | | RESULT | UNITS | METHOD |
|-----------------------|---|--------|-----------|--------|
| Metals, Digestion for | = | 1.000 | ea sample | 3030 D |
| Arsenic, As | < | 0.010 | mg/Liter | 200.8 |
| Cadmium, Cd | < | 0.001 | mg/Liter | 200.8 |
| Chromium, Cr | | 0.026 | mg/Liter | 200.8 |
| Copper, Cu | | 0.028 | mg/Liter | 200.8 |
| Lead, Pb | | 0.017 | mg/Liter | 200.8 |
| Manganese, Mn | | 29.100 | mg/Liter | 200.8 |
| Nickel, Ni | | 0.778 | mg/Liter | 200.8 |
| Silver, Ag | < | 0.021 | mg/Liter | 200.8 |
| Zinc, Zn | | 0.144 | mg/Liter | 200.8 |

STANDARD METHODS, 20TH ED.; EPA METHODS, 3RD ED.

Collected by:

ERIC A. SORRELLS on 09/03/14 at 11:20

Analysis by :

SEE ATTACHED QUALITY ASSURANCE PAGE.

Sample preservation and Laboratory Analysis conducted according to EPA 40 CFR Part 136. Test/Analyst/Time/Coeff./Var./ QA plan filed with ADPC&E. Includes 10 % replication and 10 % recovery studies by random selection. Instruments maintained and calibrated and records kept. See Attached.

Copies to:

MR. CHUCK JONES
ENV. HEALTH & SAFETY MGR

ONE SCROLL DRIVE
ARKADELPHIA, AR 71923-

Laboratory Number: 17444.0001 TKR Reviewed By: K. E. Sorrells, M.S. []



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Toll Free 1-800-331-8139

QUALITY ASSURANCE

September 3, 2014

The following QA represents SRA's Quality Assurance values for this report.

| ANALYTE | ANALYST | BEG. DATE | BEG. TIME | FIN. DATE | FIN. TIME | S.D. % | SPK. REC. | #IN BAT |
|--------------------------|---------|--------------|--------------|--------------|--------------|-----------|--------------|------------|
| Arkansas Analytical Inc. | | / / | 0 | / / | 0 | 0.00 | 0.0 | 0 |

Field PH/TEMP/D.O. Sampler or Courier/ at time of sampling or pick up
Sample preservation and laboratory analysis conducted according to EPA
40 CFR Part 136 TEST/ANALYST/TIME/COEF. VAR.* QA PLAN filed with
ADPC&E. Include replication.

KES = K. E. Sorrells
JBS = James B. Sorrells
CAS = Cecil A. Sorrells
MKM = Mark Kyle McKenzie

KESII = K. E. Sorrells, II
TJS = Todd J. Sanders
JHD = J. Henry Dodson

Laboratory Number: 17444.0001 TKR

SUKKELLS KESEAKUH ASSOCIATES, INC
 8100 NATIONAL DRIVE, LITTLE ROCK, AR 72209
 501-562-8139 800-331-8139
 FAX 501-562-7025

CHAIN OF CUSTODY RECORD

FOR LAB/OFFICE USE ONLY

STANDARD METHODS PRESERVATION PER EPA 40 CFR
 C4= COOL TO 4.C
 S<2= SULFURIC ACID TO pH<2
 N<2= NITRIC ACID TO pH<2

TURN AROUND TIME
 RUSH 24HR. 48 HR.
 5 DAY REG _____
 OTHER _____

T= THIOSULFATE FOR DECHLORINATION
 W= WINKLER AZIDE MODIFICATION
 P= MEMBRANE ELECTRODE
 NaOH= pH >12

P.O.# _____

110213K2

SAMPLER(S) NAME: (PRINT)

PROJECT NO:

NAME OF COMPANY, CITY, OR PROJECT

E. Sorells

| SAMPLE NO: | SAMPLE ID AND/OR COLLECTION LOCATION | START | | END | | COMP | | FIELD ANALYSIS | | | D.O (W) | CONTAINER TYPE | ANALYSIS REQUIRED |
|------------|--------------------------------------|---------------|---------------|-----------|-----------|------|----|----------------|------|-----|---------|----------------|--|
| | | DATE/TIME | DATE/TIME | DATE/TIME | DATE/TIME | GRAB | PH | TEMP | FLOW | CL2 | | | |
| | <i>Bin Elk</i> | <i>9.3.14</i> | <i>9.3.14</i> | <i>9</i> | | | | | | | | <i>NK2</i> | <i>Metals</i> <i>As, Cd, Cr, Cu, Pb,</i> <i>Mn, Ni, Ag, Zn</i> |
| | | <i>1120</i> | <i>1123</i> | | | | | | | | | | |
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METHOD OF SHIPMENT (CIRCLE)
 FED EX WALK IN (SRA) UPS OTHER

PH 7
 PH 4
 PH 10
 D.O


TYPE OF SAMPLE(S): (CIRCLE)
 WATER SOIL W/W SLUDGE OTHER

NOTES/COMMENTS/OBSERVATIONS
7CL4

FIELD ANALYSIS CONDUCTED BY: (CIRCLE) *SBA* CLIENT

RELINQUISHED BY: _____ DATE/TIME: _____

RELINQUISHED BY: _____ DATE/TIME: *9.3.14, 1300*

RECEIVED BY (LAB)  DATE/TIME: *9.3.14, 1123*