

From: [Gilliam, Allen](#)
To: [chuck_jones](#)
Cc: [Burrow, Kealey](#); [Arkadelphia - Brenda Gills](#)
Subject: AR0020605_Danfoss ARP001040 Sept 2015 quarterly pretreatment report no CN analysis_20150921
Date: Monday, September 21, 2015 1:54:28 PM
Attachments: [20150921111634477.pdf](#)
[image002.png](#)

Chuck,

Danfoss' quarterly report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically compliant with the Pretreatment standards in the Metal Finishing category located in 40 CFR 433.17.

You've listed 0.01 mg/L for CN, but no certified lab's analyticals were attached. Please submit the CN analyticals within 10 days from the date on this correspondence.

Note: The chain of custody submitted with the report is not complete. The sampler's name is not shown. Results from an incomplete/broken chain of custody may not be used admissible in a court of law.

Per our conversations regarding your stormwater sump being pumped in with the regulated wastewater, Danfoss must take into account this dilution using the combined wastestream formula in 40 CFR 403.6(e)(1). The Federally regulated Metal Finishing standards mentioned above will be reduced in somewhat the same ratio of the stormwater to the total flow discharged on a sampling day which included stormwater. Logs should also be kept to account for the amount of stormwater

$$C_T = \left(\frac{\sum_{i=1}^N C_i F_i}{\sum_{i=1}^N F_i} \right) \left(\frac{F_T - F_D}{F_T} \right)$$

(gpd) that dilutes the regulated wastestream per the formula:

where " C_T " = the alternative concentration limit for the combined wastestream.

C_i = the categorical Pretreatment Standard concentration limit for a pollutant in the regulated stream i .

F_i = the average daily flow (at least a 30-day average) of stream i to the extent that it is regulated for such pollutant.

F_D = the average daily flow (at least a 30-day average) from: (a) Boiler blowdown streams, non-contact cooling streams, stormwater streams, and demineralizer backwash streams..."

If there are any questions please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator

501.682.0625

Ec: Brenda Gills, Arkadelphia Utilities Manager

E/NPDES/NPDES/Pretreatment/Reports

-----Original Message-----

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

Sent: Monday, September 21, 2015 11:47 AM

To: Gilliam, Allen

Subject: FW:

HERE IS THE CORECTED ONE SIR

THANKS FOR HELPING ME OUT

Chuck Jones, NREMT-P
Environmental, Health and Safety Manager
Commercial Compressors North America
Danfoss LLC
One Scroll Drive
Arkadelphia, AR 71923
chuck.jones@danfoss.com
Tel.: 870-246-0714
Mobile: 501-617-3459
Fax: 870-245-0150
<http://www.danfoss.com>

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

B. PERIOD COVERED BY THIS REPORT

FROM: June **TO:** Sept

(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)⁴

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 2015 QR
 ARP 001040
 AR0020605
 AFIN 10-00102
 Filed Date 2015 09 21

⁴SEE 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	.00052	.0104	.00843	.0156	0.0935	.0208	.0203	.010	*
Avg Measured**	.00052	.0104	.00843	.0156	0.0935	.0208	.0203	.010	*

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)

[Signature]
(Corporate Officer or authorized representative signature)

Date of Signature 9/21/15

(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:

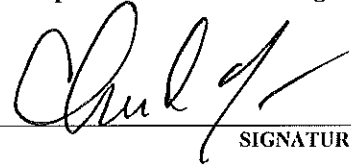
1. We continue to use mechanical separation of oil and grease prior to pre-treatment.
2. _____
3. _____
4. _____
5. _____

(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.

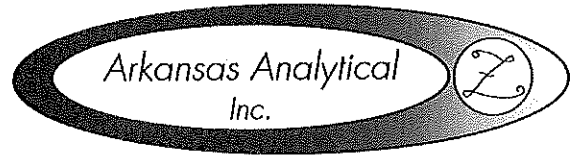
Chuck Jones
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE



SIGNATURE

EHS Manager
OFFICIAL TITLE

9/21/15
DATE SIGNED



11701 I-30 Bldg 1, Ste 115 - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

15 September 2015

Chuck Jones
Danfoss - Scroll Technologies
1 Scroll Drive
Arkadelphia, AR 71923-8813

Project: Effluent Sample
Project Number: September 2015
SDG Number: 1509110

Enclosed are the results of analyses for samples received by the laboratory on 09-Sep-15 14:15. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

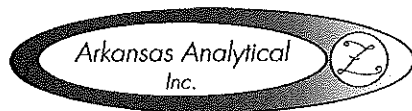
Custody Seals	✓
Containers Correct	✓
COC/Labels Agree	✓
Received On Ice	✓
Temperature on Receipt	3.0°C

Sincerely,

Norma James and/or Teresa Coins
Technical Director and/or QA Officer

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15 September 2015



Chuck Jones
Danfoss - Scroll Technologies
1 Scroll Drive
Arkadelphia, AR 71923-8813
Project: Effluent Sample
Project Number: September 2015
Date Received: 09-Sep-15 14:15

ANALYTICAL RESULTS

Lab Number: 1509110-01
Sample Name: Effluent Grab (Metals Only)
Date/Time Collected: 9/9/15 9:00
Sample Matrix: Water

Table with 7 columns: Total Metals, Units, Result, Qualifier(s), Date/Time Analyzed, Batch, Method. Rows include Arsenic, Cadmium, Chromium, Copper, Lead, Manganese, Nickel, Silver, and Zinc.

QUALITY CONTROL RESULTS

Total Metals -- Batch: A509231 (Water)
Prepared: 11-Sep-15 15:30 By: HF -- Analyzed: 14-Sep-15 14:50 By: HF

Table with 7 columns: Analyte, BLK, LCS/LCSD, MS/MSD, Dup, RPD, Qualifiers. Rows include Arsenic, Cadmium, Chromium, Copper, Lead, Manganese, Nickel, Silver, and Zinc.

All Analysis performed according to EPA approved methodology when available:
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.
Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Reviewed by: [Signature]
Norma James and/or Teresa Coins
Technical Director and/or QA Officer

