

Wilson, Tabatha

From: Torrence, Rufus
Sent: Friday, June 21, 2013 10:35 AM
To: Jones Chuck (Chuck.Jones@danfoss.com)
Cc: Wilson, Tabatha
Subject: AFIN 10-00102 ARP001040 Danfoss Site Visit for Compliance Assurance: Inspection
Attachments: DFS Insp 20130515.doc; DFS Lab Report.doc

ADEQ

ARKANSAS
Department of Environmental Quality

June 21, 2013

Chuck Jones, EHS Manager
Danfoss, LLC
One Scroll Drive
Arkadelphia, AR 71923

Re: May 15, 2013 Site Visit for Compliance Assurance: Inspection
(Tracking No. ARP001040 AFIN 10-00102 AR0020605)

Dear Mr. Jones:

Part of ADEQ responsibility to EPA is to inspect industries regulated by categorical pretreatment standards (40 CFR Part 405 – 471) on a periodic basis. These industries are referred to as Categorical Industrial Users (CIUs) if they discharge the regulated wastewater into the local Publicly Owned Treatment Works (POTW). Danfoss (DFS) has processes (Coating-Phosphate/Zirconium & Passivation) in the Arkadelphia facility that are regulated by 40 CFR Part 433 and discharges to the City of Arkadelphia POTW. Therefore, DFS is a CIU. In accordance to 40 CFR 403.12(e), DFS must submit periodic reports to the Control Authority (ADEQ or Department) and in accordance with 40 CFR 403.8(f)(2)(v) be inspected by the Control Authority at least bi-annually. The

Department appreciates DFS taking the time on Wednesday (May 15, 2013) to show the ADEQ Engineer/Inspector (Rufus Torrence) the facility in Arkadelphia.

The inspection consisted of inspecting the shop operations (constructing scroll compressors), acid tanks and wastewater sampling. Danfoss rolls metal sheets to form the shell of the compressor (this operation is not regulated). Nonetheless, during the walk-through, the inspector noticed that DFS has three possible 40CFR433 core operations. In addition Parco/Phosphate conversion coating operation, the modified seven stage washer (Zircobond/Zirconium Coating) and the rust removal (passivation) may also be core operations. Core operations are the key processes in determining the applicability of the 40CFR433 category.

DFS has no open floor drains in the plant which connect directly to the POTW. Wastewater enters open floor drains and all wastewater is pumped to the pretreatment system which consists of pH adjustment/floc. The treated wastewater is sampled at the end of the pretreatment system, metered and released to the POTW.

Danfoss limits have been adjusted to account for dilution from the stormwater which Danfoss pumps into the pretreatment system; therefore, Danfoss' limits are not shown in 40CFR433 as they have been reduced by using the Combined Wastestream Formula (CWF) shown in 40CFR403.6(e); for example, the zinc limits are 2.573 & 1.459 mg/l. If DFS has any questions about the procedure, let the Department know.

According to 40CFR433.12(a) DFS may submit a Toxic Organic Management Plan in lieu of sampling for TTOs; presently, DFS is required to sample for the 110 toxic organic, seven metals and total cyanide for each semi-annual report. DFS may review the EPA Guidance Manual for Implementing Total Toxic Organics Pretreatment Standards by accessing this web site:

<http://www.epa.gov/npdes/pubs/owm0021.pdf>

DFS can find an example of a Toxic Organic Management Plan in Appendix D of this manual.

During the inspection, the inspector and DFS split wastewater samples of the regulated wastewater that will enter the local POTW. The ADEQ lab analysis is attached. The wastewater complies with the limits in 40 CFR 433.

DFS must continue sampling (at least semi-annually) all regulated wastewater for all 40 CFR 433 parameters before it enters the POTW.

The Department appreciates DFS' continued efforts in periodic reporting.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rufus Torrence". The signature is fluid and cursive, with a prominent initial "R" and "T".

Rufus Torrence,
ADEQ Engineer/Inspector

Attachments: ADEQ Lab Analysis
ADEQ Inspection Report dated April 18, 2012

Pretreatment Industrial Inspection

Facility Information

Facility Name: Danfoss, LLC	Site Address: One Scroll Drive
	Arkadelphia, AR 71923
Signatory Authority (Name & Title): T. Paul Dean, General Manager	
Phone: 870-246-0700	Mailing Address (if different):
Fax:	Same
Address: Same	Corporate Owner Name and address (if applicable):
Contact Person (Name & Title):	Member of the Danfoss Group
Chuck Jones, Env Health and Safety Mgr.	Nordborgvej 81 6430 Nordborg Denmark
Phone: 870-246-0714	Phone: +45 7488 2222
Fax:	Fax: +45 7449 0949
e-mail: chuck.jones@danfoss.com	Corporate CEO: Neils B. Christiansen
	e-mail:

Facility Permit # ARP001040 AFIN 10-00102	Last Inspection Date: April 18, 2012
---	---

POTW (City) IU discharges to: Arkadelphia Water Dept (Utility)	POTW's NPDES # AR0020605
---	---------------------------------


Industrial Classification:	<input checked="" type="checkbox"/> Categorical	<input type="checkbox"/> Significant
----------------------------	--	---

If Categorical, list which CFR #(s) the facility is subject to: **40 CFR 433**

Table of Contents

I. Summary of Inspection	Page	of
A. Inspection Objectives		
B. Inspection Analysis		
II. Pre-Inspection Meeting	Page	of
A. General Information		
B. Facility Permits		
C. Additional Comments		
III. Attachments "Yes" indicates item exists at the facility and attachments will be included		
"No" indicates item does not exist at the facility and attachments aren't necessary		
A. Industrial Processes	yes <input checked="" type="checkbox"/> no <input type="checkbox"/>	Page of
B. Pollution Prevention Activities	yes <input checked="" type="checkbox"/> no <input type="checkbox"/>	Page of
C. Pretreatment System	yes <input checked="" type="checkbox"/> no <input type="checkbox"/>	Page of
D. Chemical Storage	yes <input checked="" type="checkbox"/> no <input type="checkbox"/>	Page of
E. Spill/Slug Control Plan	yes <input checked="" type="checkbox"/> no <input type="checkbox"/>	Page of
F. Self-Monitoring/TOMP	yes <input checked="" type="checkbox"/> no <input type="checkbox"/>	Page of

Comments : **This facility has three possible core processes: Parco (Phosphatizing-Coating), Zircobond (Zirconium Coating) and Rust Removal (Coating).**

Inspector's Name (Print): Rufus Torrence	Signature: 
---	--

IU Rep's Name (Print) Chuck Jones	Signature: Not Applicable
---	-------------------------------------

Date and Time Inspection Ended: **May 15, 2013 @ 12:15 pm**

I. Summary of Inspection			
A. Inspection and Objective (Complete Before Inspection)			
<input type="checkbox"/> Permit Renewal	<input checked="" type="checkbox"/> Annual	<input type="checkbox"/> Spill/Slug	<input type="checkbox"/> Unscheduled
<input type="checkbox"/> New Construction	<input type="checkbox"/> Noncompliance	<input type="checkbox"/> Follow-up	<input type="checkbox"/> Complaint
Inspection Objective(s): <i>Compliance Assurance</i>			
Checklist of items to be reviewed and/or visually inspected:			
<input checked="" type="checkbox"/> Pre-inspection Meeting	<input type="checkbox"/> Permit Conditions	<input type="checkbox"/> Safety Concerns	
<input checked="" type="checkbox"/> Process Inspection	<input checked="" type="checkbox"/> Pretreatment Process	<input type="checkbox"/> TOMP*	
<input checked="" type="checkbox"/> Chemical Storage	<input checked="" type="checkbox"/> Discharge point(s)	<input type="checkbox"/> Spills/Slug Control Plan**	
<input checked="" type="checkbox"/> Records Review	<input type="checkbox"/> RCRA information	<input type="checkbox"/> Process/Flow/Pretreatment Schematics	
<input checked="" type="checkbox"/> IU sampling procedures	<input type="checkbox"/> Flow/pH Meter(s)	<input type="checkbox"/> Calibration Records	
<input type="checkbox"/> MSDS Inventory List	<input type="checkbox"/> New MSDS	<input type="checkbox"/>	
Comments: <i>*Danfoss Scroll has elected to sample for TTOs in lieu of submitting a TOMP to ADEQ.</i>			
<i>**A Spills/Slug Control Plan appears unnecessary at this time.</i>			
B. Inspection Analysis			
Were there any deficiencies/violations identified and noted during the inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Provide a brief narrative of deficiencies/violations or other concerns in the following areas:			
Records Review			
Process Area(s):			
Pretreatment System			
Self Monitoring Procedures			
Diversion/Sewer Meters			
Spill/Slug Control Plan			
Sampling Point			
Chemical Storage			



II. Pre-Inspection Meeting		
A. General Information		
Date and Time Inspection Started: <i>May 15, 2013 @ 10:00 am</i>		SIC code(s): <i>3585</i>
IU Reps/Titles	Control Authority Reps/Titles	
<i>Chuck Jones, EH&S Manager</i>	<i>Rufus Torrence, Engineer</i>	
End product(s): <i>Scroll A/C compressors</i>		Approx. # of units produced: <i>1000/day</i>
Days of Operation: <i>7 days/week</i>		Days of Production (if different): <i>same</i>
Hours of Operation: <i>24 hours/day</i>		Hours of Production (if different): <i>same</i>
Shift 1, hrs.: <i>8:00 am to 5:00 pm</i>	Shift 2, hrs.: <i>N/A</i>	Shift 3, hrs.: <i>N/A</i>
# of Employees: <i>197 (as of May 2013)</i>	Peak Mos.:	"Off" Mos.:
Are there any scheduled plant shutdowns? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If yes, when? <i>July & December</i>		
Are there designated plant clean-up days? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If yes, when?		
Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
If No, explain:		
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
If Yes, explain:		
Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: <input type="checkbox"/> Yes. <input checked="" type="checkbox"/> No		
If Yes, explain:		
Has there been any changes since the last inspection regarding the following items:		
Plant/flow/process layout? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, obtain copy of updated schematic for facility file.		
Processes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:		
Production Levels? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:		
Raw materials? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:		
Flow rates? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:		
Are regulated and non-regulated wastestreams combined? Yes <input checked="" type="checkbox"/> no <input type="checkbox"/>		
Prior to Pretreatment System? Yes <input checked="" type="checkbox"/> no <input type="checkbox"/> N/A <input type="checkbox"/>		
If Yes, was the CWF used to calculate limits? Yes <input checked="" type="checkbox"/> no <input type="checkbox"/>		
Prior to connection to the POTW sanitary sewer? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>		
At connection to sanitary sewer? yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A <input type="checkbox"/>		
Production and flows verified for Production-Based Standards? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>		
What is the current avg. production rate and process flow? <i>Not Applicable</i>		
Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>		
<i>Not Applicable</i>		

B. Facility Permits		
Permit Type	Permit No.	Expiration Date
Air	<i>1223-A</i>	<i>Voided</i>
RCRA	<i>Not Applicable</i>	<i>N/A</i>
NPDES	<i>ARR00B641</i>	<i>Active</i>
Other	<i>ARR00A240</i>	<i>Voided</i>
C. Additional Comments		
(Note which section or attachment comments are regarding)		
1. <i>Danfoss has both ISO 9001 and ISO 14001 Certification</i>		
2. <i>The Parco process is actually a phosphate conversion coating process that uses phosphoric acid, nitric acid and nickel nitrate. This coating provides lubricity to the moving parts during start-up.</i>		
3. <i>The seven stage phosphate washer recently was modified to produce a “Zircobond” coating. The process produces a zirconium coating.</i>		
4. <i>Danfoss also receives cast steel parts which are machined on site to create parts for the compressors. Danfoss receives round steel stock in eight-foot lengths which are cut to length and machined to form "eccentric" shafts for the compressors. Danfoss purchases the stator and rotor from outside vendors. Danfoss has automated assembly lines which piece together the parts for the compressors. The stationery scroll and orbiting scroll are washed in alkaline and phosphoric baths. Furthermore, the steel tube housing is also washed in an alkaline bath prior to painting. Danfoss ships the finish product to the two owners (Carlyle/Carrier and Bristol/York...sold to Danfoss Group).</i>		
5. <i>Copeland is Scroll Tech main competitor; the compressors are sold to York (about 60%), to Carrier (about 20%) and 20% to others.</i>		
6. <i>In addition to the Parco and Phosphate Washer, Danfoss is employing a “Derust” operation which uses Citric Acid. The Parco and Phosphating are core processes; the Derust may also be a core process.</i>		

Attachment A: Industrial Process(es)

List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not

1. Ransohoff (Soap) Wash	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4. Derust (Citric Acid)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2. Parco Coating (Core Process)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5.	Yes <input type="checkbox"/> No <input type="checkbox"/>
3. Zircobond Coating (Core)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	6.	Yes <input type="checkbox"/> No <input type="checkbox"/>

Were processes visually inspected? Yes No N/A

Brief description of process(es):

Ransohoff is a hydroxide soapy wash to remove oil, grease and other contaminants and is a 40 CFR 433 "ancillary" operation.

Parco is a phosphate conversion process that falls under 40 CFR 433 as a "core" operation.

Zircobond Coating is performed in the old "phosphate" seven-stage washer and also is a 40 CFR 433 core operation. The principle is based on EPD (Electrophoretic Deposition).

General observations of facility's indoor housekeeping: **Excellent**

General observations of area outside facility's building: **Excellent**

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured (M) or estimated (E). If batch (B) discharged, list frequency and volume (1000 gal/month, e.g.).

<input type="checkbox"/> Process Rinse Overflows	<input type="checkbox"/> Equip. Cleanup	<input checked="" type="checkbox"/> Floor Cleanup	<input type="checkbox"/> Spent Bath Solutions
<input checked="" type="checkbox"/> Product Cleaning	<input type="checkbox"/> Forklifts Maint./Wash	<input type="checkbox"/> Tank Dragout	<input type="checkbox"/> Air Pollution Devices
<input type="checkbox"/> Boiler Blowdown	<input type="checkbox"/> Spent Rinse Tanks	<input type="checkbox"/> Equipment Coolants	<input type="checkbox"/> Non-Contact Cooling Water
<input checked="" type="checkbox"/> Stormwater	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

List Major Raw Materials and Chemicals used:

Cast parts machined to form "scroll" fixed and orbiting parts. Steel rods are imported from China.

Acids (phosphoric, nitric, etc.) for cleaning and coating.

Lubricating oils for moving parts in compressor

Check Waste Stream Pollutants of Concern from Process(es)

<input type="checkbox"/> BOD	<input type="checkbox"/> CN ⁻	<input checked="" type="checkbox"/> Metals (List) <i>Cd,Cu,Cr,Ni,Pb,Ag & Zn</i>	<input type="checkbox"/> Solvents (List)
<input type="checkbox"/> TSS	<input type="checkbox"/> Cl ₂		
<input type="checkbox"/> O&G	<input type="checkbox"/> S ⁻		
<input type="checkbox"/> pH	<input type="checkbox"/>		

Are there floor drains in the Process area? Yes No If yes list number and the location of all floor drains:

Attachment B: Pollution Prevention (P2) / Recycling Activities	
Does the facility have a written P2 Plan? Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> <i>But documentation is pending</i>
Does this facility practice P2? Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> <i>In practice, but system still under development</i>
Environmental Management System in place? Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> <i>EMS is being developed for ISO Certification</i>
ISO Certified? Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> <i>ISO 9001 & ISO 14001</i>
Written Standard Operating Procedures? Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:	
Preventative Maintenance Program Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (hydraulic systems, valves, pumps, etc)
Explain:	
Water Reuse: Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Explain:	
Cost Accounting to Track Savings: Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:	
Inventory Control / "Green Purchasing": Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (lean manufacturing/"env. friendly purchasing", etc)
Explain:	
Employee Training: Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Explain:	
Spent Solvent Reclamation? Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:	
Recycle Paper, Aluminum, Boxes, and Pallets? Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:	
Recycle Waste Oil, Solvents, and Lubricants? Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:	
Other Activities	
P2 Equipment/Practices in use:	
<input type="checkbox"/> Overflow Alarms	<input type="checkbox"/> Aqueous Cleaning Solutions
<input type="checkbox"/> Fog Spray Rinsing	<input type="checkbox"/> Countercurrent Rinsing
<input type="checkbox"/> Dragout Collection Trays	<input type="checkbox"/> Seal-Less Pumps
<input type="checkbox"/> Air Jets to Blow Parts Dry	<input type="checkbox"/> Secondary Containment of Process Solutions
<input type="checkbox"/> Aqueous Paint Stripping Solutions	<input checked="" type="checkbox"/> Bead Blasting to Remove Paint
<input checked="" type="checkbox"/> Water Soluble Cutting Fluids	<input type="checkbox"/> Recycle Overspray
<input type="checkbox"/> In-Process Recycle (Ion Exchange, Reverse Osmosis)	<input type="checkbox"/> Conductivity Meters
<input type="checkbox"/> Dead Rinse Tanks	<input type="checkbox"/> Bath / Rinse Filtration

Attachment C: Pretreatment System			
Are wastestreams segregated before pretreatment?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No <input type="checkbox"/> N/A
Are they pretreated prior to discharge to the sanitary sewer?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
Was the pretreatment system visually inspected during this visit?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:			
<input type="checkbox"/> Dissolved air floatation	<input type="checkbox"/> Membrane Tech.	<input type="checkbox"/> Ion Exchange	<input type="checkbox"/> Biological Treatment
<input type="checkbox"/> Centrifugation	<input type="checkbox"/> Flow Equalization	<input type="checkbox"/> Ozonation	<input type="checkbox"/> Chlorinating
<input checked="" type="checkbox"/> Chemical Precipitation	<input type="checkbox"/> Oil/Water Separation	<input type="checkbox"/> Reverse Osmosis	<input type="checkbox"/> Grit Removal
<input type="checkbox"/> Sludge Filter Press	<input type="checkbox"/> Grease Trap	<input type="checkbox"/> Screen	<input type="checkbox"/> Solvent Separation
<input checked="" type="checkbox"/> pH Adjustment	<input type="checkbox"/> Sand Trap	<input type="checkbox"/> Sedimentation	<input type="checkbox"/> Silver Recovery
<input type="checkbox"/> Belt/Disk Oil Skimmer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):			
<i>System appears to well operated and maintained.</i>			
Does the description match the schematic currently on file? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A			
System Operator(s) Name: <i>Darrell Franklin, Carl Wells, Melissa Franklin, James Diemer & Byran Rutherford have Industrial Operator license.</i>			
<i>Greg Newton, Mike Bell, Kenneth Langley, and Greg Conant have Advance Industrial Operator license.</i>			
Does discharge permit require licensed operator?		<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> N/A
Is the System Operator(s) licensed by the State of Arkansas (per Reg. # 3?)		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> N/A
List Name(s) and License classification: <i>(Listed above)</i>			
Is training provided to the Pretreatment System Operator(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A			
If Yes, list type and frequency:			
Is the discharge from the Pretreatment System? <input type="checkbox"/> Batch <input checked="" type="checkbox"/> Continuous <input type="checkbox"/> Combination			
If any discharges are batch type or combination, describe the following:			
Volume of each batch: _____ gallons per			
Describe process from which batch originated (spent bath, e.g.):			
Approximate duration of batch discharge:			
Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)	

Attachment D: Chemical Storage Area(s)		
Does the facility have a designated chemical storage area(s)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (<i>Decentralized; see comment below</i>)		
Was this area(s) visually inspected? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A		
Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
2.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
3.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
4.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
Does the Chemical Storage Area(s) contain any of the following?		
<input type="checkbox"/> Dikes, Berms for Containment	<input type="checkbox"/> Plugs for Floor Drains	
<input type="checkbox"/> Secondary Tanks for Holding	<input type="checkbox"/> Premix (low) Concentrations	
<input type="checkbox"/> Alarms	<input type="checkbox"/> Chain restraints, limited access	
<input type="checkbox"/> Spills Control Kits for Cleanup	<input type="checkbox"/> Notification Procedures	
<input type="checkbox"/> Chemical desegregation within Storage Area	<input type="checkbox"/> Other	
Chemical Inventory List (MSDS) on file? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Were any new MSDS reviewed during the Inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
If yes, list below:		
Chemical storage comments:		
<i>Presently, Danfoss has “decentralized chemical storage”. The decentralized location are equipped with berms for spill control.</i>		
Chemical handling procedures (totes, dolly, buckets, hardline, etc):		
<i>Totes, Forklifts,</i>		

Attachment E: Spill/Slug Control Plan	
Does the facility have a Spill/Slug control plan?	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no ¹
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(A) Describes discharge practices including non routine batch (slug) discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(B) Describes storage and handling of chemicals	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(C) Procedures for immediate notification to POTW of slug discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
2. Describes procedures and equipment for emergency response	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
3. Describes follow-up to limit damage suffered by POTW or environment	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	<input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A
If no:	
Does the facility have Spill/Slug Notification Procedures posted?	<input type="checkbox"/> yes <input type="checkbox"/> no
Is it posted in areas where chemicals are used and stored?	<input type="checkbox"/> yes <input type="checkbox"/> no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	<input type="checkbox"/> yes <input type="checkbox"/> no
Have there been any non-routine, episodic discharges or chemical spills in the past year?	<input type="checkbox"/> yes <input type="checkbox"/> no
(Briefly Describe, Include Dates)	
Not Applicable	
Was the City notified of these occurrences? <input type="checkbox"/> yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A	
Visual Inspection of Discharge Lines/Points	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point <i>Effluent tank with top spill to POTW.</i>	
Total Flow Monitoring Point <i>Inline flow totalizer on effluent pipe to POTW.</i>	
Upstream Manhole	
Point of Connection:	

¹ Facility has no open floor drains to the POTW so a SPCC for the POTW protection appears unnecessary.

Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title.

Sorrells Lab Technician takes 24-hour composite sample from tank/vat at the end of the pretreatment system.

Where is the sample point located? *Effluent tank with top spill to POTW.*

<input type="checkbox"/> End of Process	<input checked="" type="checkbox"/> Pretreatment Effluent	<input type="checkbox"/> Total Flow
<input type="checkbox"/> Combined Flow	<input type="checkbox"/> Metered Flow	<input type="checkbox"/> Flow Actuator
<input type="checkbox"/> Private Manhole	<input type="checkbox"/> Utility Manhole	<input type="checkbox"/> Advance Notice Required
<input type="checkbox"/> Safety Hazards Identified	<input type="checkbox"/>	<input type="checkbox"/>

Is the Sample Collection Site Adequate? Yes No N/A

Does the facility rep. request a split sample on this sampling/inspection? Yes No

Does the facility perform self-monitoring tests in-house? Yes No N/A

If no, record the name and address of Contract Lab: *Sorrells lab in Little Rock*

Automatic Sampler or Manual

IU Self-Monitoring Results reviewed: Yes No N/A

Is the Contract Lab certified by ADEQ for test parameters? Yes No N/A

Dates and Times of Sample Analysis Recorded? Yes No N/A

Correct Methods Used for Test Analysis (Refer To 40CFR Part 136) Yes No N/A

EPA recommended holding times being met (Refer to 40CFR Part 136) Yes No N/A

Chain of Custody Records for Self-Monitoring Samples Reviewed Yes No N/A

Were correct Sample Types Collected Yes No N/A

Dates and times of Sample Collection Recorded? Yes No N/A

Were Samples preserved correctly (refer to 40CFR Part 136) Yes No N/A

Were Self Monitoring records on file for past 3 years? Yes No N/A

List the parameters the facility monitors and the frequency:

<input checked="" type="checkbox"/> Cd(t) 2/yr	<input checked="" type="checkbox"/> Cu(t) 2/yr	<input checked="" type="checkbox"/> Cr(t) 2/yr	<input checked="" type="checkbox"/> Ni(t) 2/yr	<input checked="" type="checkbox"/> Pb(t) 2/yr
<input checked="" type="checkbox"/> Ag(t) 2/yr	<input checked="" type="checkbox"/> Zn(t) 2/yr	<input type="checkbox"/> pH	<input checked="" type="checkbox"/> CN(t) 2/yr	<input type="checkbox"/> CN(a-c)
<input checked="" type="checkbox"/> TTO-Vol 2/yr	<input checked="" type="checkbox"/> TTO-B/N 2/yr	<input checked="" type="checkbox"/> TTO-A.E.	<input checked="" type="checkbox"/> TTO-Pest 2/yr	<input type="checkbox"/> Cr(hex)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433

How does the IU report TTO? Analysis Certification Statement

Does the facility have a Toxic Organic Management Plan? Yes No N/A

If yes, Does the plan show how toxic organics are used, stored, and disposed? Yes No N/A

List the date of the last revision to the TOMP:

Is the TOMP being followed as written? Yes No N/A (If no, provide explanation in comments.)

If no, is there evidence that a TOMP is needed? Yes No N/A (If yes, provide description of evidence in comments.)

Comments:



5301 Northshore Drive
North Little Rock, AR 72118
Telephone: 501-682-0744

Client Report For: Danfoss, LLC 10-00102 2013 1699
Attention:
Client Address:

,

Report Date: June 17, 2013
LAB ID: AR13MAY15-07
Comment:

Approved By: _____

Date: June 17, 2013

Client: CSI **Client Sample ID:** DFS
Lab ID: 2013-1699 **Collection Date:** 5/15/2013 11:15:00 AM
Matrix: Water

Analyses

Total Metals by EPA 200.8

EPA 200.8

Batch: 13052806 Run: 1

	Result	Reporting Limit	MDL	Qual	Unit
Aluminum	<200	200	20		ug/L
Antimony	<100	100	5		ug/L
Arsenic	<10	10	0.5		ug/L
Barium	<100	100	2.0		ug/L
Beryllium	<5	5	0.1		ug/L
Boron	7810	250	5.0		ug/L
Cadmium	<10	10	0.3		ug/L
Calcium	85.0	0.4	0.04		mg/L
Chromium	<10	10	0.3		ug/L
Cobalt	<10	10	0.5		ug/L
Copper	<10	10	0.5		ug/L
Iron	1780	200	10.0		ug/L
Lead	<10	10	0.1		ug/L
Magnesium	1.17	1	0.1		mg/L
Manganese	3640	10	0.2		ug/L
Nickel	154	25	0.5		ug/L
Potassium	22.4	10	0.05		mg/L
Selenium	<20	20	0.5		ug/L
Silver	<50	50	1.0		ug/L
Sodium	184	0.4	0.02		mg/L
Thallium	<25	25	0.05		ug/L
Vanadium	39.7	25	1.0		ug/L
Zinc	114	30	2.0		ug/L

Dilution Factor

10

Analyzed By

Robert Graddy

Analysis Date/Time

May 24 2013 1:56PM

Prep By

Prep Date/Time

Analytical Quality Control Results Report

Batch: 13052806	ICP Metals - water (total)
DFS	LIMS ID: 2013-1699

ICP Metals - water (Total) DUP

Run: 1

<i>Parameter</i>	<i>Result</i>	<i>DL</i>	<i>RL</i>	<i>Accuracy Control</i>	<i>Precision Control</i>
Aluminum	<200 ug/L	200	200		
Aluminum (RPD)	0 %				0 - 20
Antimony (RPD)	1.5 %				0 - 20
Antimony	<100 ug/L	50	100		
Arsenic	<10 ug/L	5	10		
Arsenic (RPD)	10.5 %				0 - 20
Barium (RPD)	5.2 %				0 - 20
Barium	<100 ug/L	20	100		
Beryllium	<5 ug/L	1	5		
Beryllium (RPD)	18.2 %				0 - 20
Boron (RPD)	8.1 %				0 - 20
Boron	8480 ug/L	50	250		
Cadmium	<10 ug/L	3	10		
Cadmium (RPD)	0 %				0 - 20
Calcium (RPD)	12.6 %				0 - 20
Calcium	96.5 mg/L	0.4	0.4		
Chromium	<10 ug/L	3	10		
Chromium (RPD)	0 %				0 - 20
Cobalt (RPD)	0 %				0 - 20
Cobalt	<10 ug/L	5	10		
Copper	<10 ug/L	5	10		
Copper (RPD)	16.5 %				0 - 20
Iron (RPD)	7.8 %				0 - 20
Iron	1650 ug/L	100	200		
Lead	<10 ug/L	1	10		
Lead (RPD)	3.2 %				0 - 20
Magnesium (RPD)	29.0 %				0 - 20
Magnesium	<1 mg/L	1	1		
Manganese	3700 ug/L	2	10		
Manganese (RPD)	3.0 %				0 - 20
Nickel (RPD)	2.9 %				0 - 20

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr
Ruehr@adeq.state.ar.us
501-682-0955

Nickel	160 ug/L	5	25	
Potassium	25.2 mg/L	0.5	10	
Potassium (RPD)	11.8 %			0 - 20
Selenium (RPD)	0 %			0 - 20
Selenium	<20 ug/L	5	20	
Silver	<50 ug/L	10	50	
Silver (RPD)	0 %			0 - 20
Sodium (RPD)	0.7 %			0 - 20
Sodium	183 mg/L	0.2	0.4	
Thallium	<25 ug/L	0.5	25	
Thallium (RPD)	0.7 %			0 - 20
Vanadium (RPD)	2.1 %			0 - 20
Vanadium	40.5 ug/L	10	25	
Zinc	107 ug/L	20	30	
Zinc (RPD)	6.2 %			0 - 20
Dilution Factor	10			
Analyzed By	Robert Graddy			
Analysis Date/Time	May 24 2013 2:03PM			