

Henderson, Katie

From: Torrence, Rufus
Sent: Thursday, April 05, 2012 8:15 AM
To: Jones Chuck (Chuck.Jones@danfoss.com)
Cc: Henderson, Katie
Subject: FW: ARP001040 AR0020605 AFIN 10-00102 Scroll March 2012 Semi-Annual Report
Attachments: SCT Mar 2012 SAR.pdf



April 4, 2012

Mr. Chuck Jones, EHS Manager
Danfoss Scroll LCC
One Scroll Drive
Arkadelphia, AR 71923

Re: Scroll's March 2012 Semi-Annual Report
(Permit No. AR0020605 AFIN 10-00102)

Dear Mr. Jones:

The Department has reviewed Scroll's March 2012 Semi-annual Pretreatment Report and the report is complete.

The report indicated two violations of the Daily Maximum limits on 2/1/2012:

Cadmium Conc = 0.345 mg/l > Max Limit = 0.108 mg/l
Lead Conc = 0.696 mg/l > Max Limit = 0.680 mg/l

In accordance with 40 CFR 403.12(g)(3),

If sampling performed by an Industrial User indicates a violation [Daily Max Limit], the User shall notify the [City] within 24 hours of becoming aware of the violation. The User shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Control Authority [ADEQ] within 30 days after becoming aware of the violation.

The analytical data (page 5) included in the March semi-annual report indicated that Scroll resampled on 3/7/2012 and all results were compliant. In the future, the Department will allow Scroll to continue with this procedure. In other words, Scroll does not have to contact the Department within 30 days of becoming aware of a violation. Scroll must work with the City, mitigate the problem and continue sampling until compliance is achieved, Scroll may report the results to the Department in the next regularly scheduled semi-annual report. Nonetheless, Scroll's records must contain a "Record of Communication" with the City dated between 2/1/2012 and 3/1/2012. Scroll should be ready to present the ROC during the Department's next site visit on April 18, 2012.

The Department appreciates Scroll's continued efforts in semi-annual reporting. If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us.

Sincerely,



Rufus Torrence, Pretreatment Engineer
Water Division

ARKANSAS DEPARTMENT OF ENVIRONMENTAL
5301 NORTHSIDE DRIVE • NORTH LITTLE ROCK, ARKANSAS 72118-5317 • TEL/FAX
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(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)	22142	77300	Continuous
Regulated (Cyanide)	22142	77300	Continuous
§403.6(e) Unregulated*	0	0	N/A
§403.6(e) Dilute	50	1000	Batch
Cooling Water	0	0	Continuous
Sanitary	7200	11450	Continuous
Total Flow to POTW	29342	88750	*****

*"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.

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	0.345000	0.778000	0.588000	0.588000	0.588000	0.696000	0.897000	0.013	0.100000
AMAC	0.1264	0.1617	0.218	0.1833	0.3385	0.05731	0.3731	0.077	0.1722

MAC ↔ Max Alternate Conc AAC ↔ Ave Alternate Conc AMMC ↔ Actual Measured Max Conc AMAC ↔ Actual Measured Ave Conc
See 40CFR403.6(e) for details on Alternate Concentrations

Sample Location _____ After Pre-Treatment _____

Sample Type (Grab or Composite) _____ Composite _____

Number of Samples and Frequency Collected _____ 6 Sample @ 1 per month _____

40CFR136 Preservation and Analytical Methods Use: X Yes No

X ⇒ Violation of Max (AMMC) Limit

(6) CERTIFICATION

A. [Reserved]

[Reserved]

B. CHECK ONE: §433.11(c) 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 authorized representative)

Date of Signature

Not Applicable

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.

Given under my hand and seal of office on this _____ day of _____, 199__.

Notary Public in and for _____
County, Arkansas

My commission expires _____

[Handwritten Signature]

(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:

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.

Paul Dean

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

General Manager

OFFICIAL TITLE



SIGNATURE

4-3-12

DATE SIGNED

Sept 2011- March 2012

ATTRIBUTE	CADMIUM	CHROME	COPPER	LEAD	NICKEL	SILVER	ZINC	CYANIDE	TTO	ARSENIC
12/7/2011	0.100000	0.100000	0.106000	0.100000	0.395000	0.100000	0.195000	0.013000	0.023000	0.100000
1/4/2012	0.330000	0.100000	0.163000	0.241000	0.897000	0.100000	0.760000	0.005000	0.020000	0.350000
2/1/2012	0.345000	0.778000	0.578000	0.696000	0.460000	0.100000	0.605000	0.010000	1.000000	0.787000
3/7/2012	0.100000	0.100000	0.588000	0.108000	0.433000	0.100000	0.774000	0.009000	0.046000	0.520000
9/4/2011	0.000700	0.044000	0.016900	0.001000	0.056500	0.000100	0.129800	0.000015	0.023000	0.009000
10/4/2011	0.009420	0.005600	0.035700	0.136200	0.114200	0.000100	0.149300	0.009000	0.072000	0.003240
11/4/2011	0.000100	0.004700	0.043300	0.001000	0.014400	0.001000	0.013200	0.008000	0.022000	0.002100
AMMC MAXIMUM	0.345000	0.778000	0.588000	0.696000	0.897000	0.100000	0.774000	0.013000	1.000000	0.787000
AMAC AVERAGE	0.126460	0.161757	0.218700	0.183314	0.338586	0.057314	0.375186	0.007716	0.172286	0.253049
MAC Limits	0.108000	2.731000	3.332000	0.680000	3.924000	0.424000	2.573000	1.183000	2.100000	
AAC Limits	0.069000	1.686000	2.041000	0.424000	2.346000	0.237000	1.459000	0.641000	***	