

**Gilliam, Allen**

**From:** Gilliam, Allen  
**Sent:** Tuesday, February 28, 2012 10:06 AM  
**To:** jmcpherson@hmmusa.com  
**Cc:** marion jim shempert; Henderson, Katie  
**Subject:** AR0021971\_HINO Motors ARP001025 Oct 2011 Initial Analyticals Indicating Violations Reply\_20120228 (HTML format)

Jerry,

Thank you for submittal of the analytical results from your wastewater. Three questions come to mind:

- 1) Was the sample a “grab” (one sample taken within a 15 minute period) or composite sample (with a composite sampler or several grabs taken over the discharge period)?
- 2) Was the wastewater sampled JUST regulated metal finishing wastewater? In other words, was there any non-contact wastewater, sanitary, R/O backwash or boiler blowdown mixed with it?
- 3) Was the sample representative of your pretreated wastewater throughout the day/month/year?

As discussed via the phone with you on ~2/8/12, the analytical results for most of the regulated parameters **were in violation** of the Federal Metal Finishing Standards in 40 CFR 433.17.

To wit:

Pollutant or pollutant property	Maximum for any 1 day	Monthly average shall not exceed	HINO's
	..... <u>Milligrams per liter (mg/l)</u> .....		
Cadmium (T).....	0.11	0.07	<b>0.22</b>
Chromium (T).....	2.77	1.71	<b>3.60</b>
Copper (T).....	3.38	2.07	<b>14.0</b>
Lead (T).....	0.69	0.43	<b>0.58</b>
Nickel (T).....	3.98	2.38	<b>140</b>
Silver (T).....	0.43	0.24	<0.5
Zinc (T).....	2.61	1.48	<b>64.0</b>
Cyanide (T).....	1.20	0.65	<0.01
TTO.....	2.13	.....	non-detect

Within the Baseline Monitoring Report sent you on 2/14/12, Section 6, the 40 CFR 403.12(b)(6) Compliance Certification asks,

“A. Are applicable categorical pretreatment standards being met on a consistent basis? YES \_\_\_ NO \_\_\_

B. If no, do you require:

(i) Additional operation and maintenance (O&M) to achieve compliance? YES \_\_\_ NO \_\_\_

(ii) New or additional pretreatment facilities to achieve compliance? YES \_\_\_ NO \_\_\_”

Obviously, HINO will require one or both of the above activities to proceed to come into compliance with the Federal Metal Finishing Standard in 40 CFR 433.17. A compliance schedule will be required per 40 CFR 403.12(b)(7)(c) unless your next set of analyticals indicate compliance.

This office is at your service to help achieve compliance and understanding the National Pretreatment Regulations incumbent on indirect dischargers such as HINO.

Please keep in mind these are not Marion's or ADEQ's limitations. They are Federal standards applied and enforced nationwide.

Feel free to contact this office with any questions you may have regarding the Baseline Monitoring Report (BMR).

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ps: Jerry, I received the schematics of your "w.w. treatment facility" yesterday. I've looked at it several times from different angles and it's going to take me some time with you to figure out the flows. It looks like it's more than a simple chemical precipitation system (if operated properly) which should remove the metals' concentrations below the federal limitations. Can't wait to see your process ops' flow schematic(s)!

ec: Jim Shempert, City of Marion, Utility Manager

**From:** [jmcperson@hmmusa.com](mailto:jmcperson@hmmusa.com) [<mailto:jmcperson@hmmusa.com>]

**Sent:** Friday, February 24, 2012 10:29 AM

**To:** Gilliam, Allen

**Cc:** 'jshempert.waterdept@yahoo.com'

**Subject:** Re: AR0021971\_HINO Motors (ARP001025) Baseline Monitoring Report and other requirements\_20120213

**Importance:** High

Allen

Sorry for being late of sending the result. After we talked we had some visitors show up and that took my time until now.

Attached it result from November, 2011, I plan on doing a sample next week and I will sent it to you and Jim Shempert of Marion,

I will also complete the 180 day baseline, very quickly and get it back to you.

Best Regards

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