

Gilliam, Allen

From: jmcpherson@hmmusa.com
Sent: Tuesday, February 28, 2012 11:38 AM
To: Gilliam, Allen
Cc: Henderson, Katie; marion jim shempert
Subject: AR0021971_HINO Motors ARP001025 Response to Oct 2011 Initial Analyticals Indicating Violations Reply_20120228

Importance: High

Allen

I have contacted American Interplex to send me some sampling containers, I will redo the test.

I asked our Waste Water operator about how he took the samples. He stated that he use a 5 gallon (plastic) bucket and filled it up, Then took samples from it. I asked what the bucket was used for. Not a good answer for me...

SO I will take the samples and send them to Little Rock for analysis. Then I will send out the report.

Best Regards

Jerry McPherson
Manager EHS
Hino Motors Manufacturing USA
100 Hino Blvd
Marion, AR 72364
Direct # 870-702-3037
Cell #870-635-1367
E-Mail: jmcpherson@hmmusa.com

"SAFETY IS ALWAYS FIRST"

"Gilliam, Allen" <GILLIAM@adeq.state.ar.us>

02/28/2012 10:05

To "jmcpherson@hmmusa.com" <jmcpherson@hmmusa.com>
cc marion jim shempert <jshempert.waterdept@yahoo.com>, "Henderson, Katie" <HENDERSONK@adeq.state.ar.us>
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	0.22
Chromium (T).....	2.77	1.71	3.60
Copper (T).....	3.38	2.07	14.0
Lead (T).....	0.69	0.43	0.58
Nickel (T).....	3.98	2.38	140
Silver (T).....	0.43	0.24	<0.5
Zinc (T).....	2.61	1.48	64.0
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>]

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

Jerry McPherson
Manager EHS
Hino Motors Manufacturing USA
100 Hino Blvd
Marion, AR 72364
Direct # 870-702-3037
Cell #870-635-1367
E-Mail: jmcpherson@hmmusa.com