Peltier, Hannah

From: Gilliam, Allen
Sent: Tuesday, December 16, 2014 2:22 PM
To: Tommie Purifoy; bo brown
Cc: Fuller, Kim; Peltier, Hannah; shempert.waterdept@yahoo.com
Subject: AR0021907_Hino Motors ARP001025 Dec 2014 semi annual report and toxic organic management plan information_20141216
Attachments: 433 semi annual report FORM 2013.doc; TOMP For Greenville Tube.pdf; tomp 09.pdf

Comments in red Tommie…

All information below (and more) was transmitted to Jerry McPherson beginning in early '12 via e-mails which can be found on ADEQ's website.

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Jim Shempert, City of Marion Utility Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Tommie Purifoy [mailto:TPurifoy@HMMUSA.COM]
Sent: Tuesday, December 09, 2014 5:39 PM
To: Gilliam, Allen
Subject: Storm Water Reporting Requirements & Wastewater Pretreatment Requirements

Allen Gilliam,

My name is Tommie Purifoy, and I am the EHS Manager at Hino Motors Manufacturing, Inc. located in Marion, Arkansas.

I received your contact information from Jimmy "Bo" Brown, who works with me here at Hino Motors Manufacturing.

I am sending you this email because I have a few questions that I would like to ask you pertaining to the reporting requirements for Wastewater Pretreatment.

I tried to find this information on the ADEQ website, but I was unsuccessful with locating the information that I was needing on the ADEQ website.

Question #1 – When is the deadline for facilities to submit their Semi-Annual Wastewater Pretreatment report and Wastewater sampling results?

A #1 – under 40 CFR 403.12(e), "Periodic reports on continued compliance. (1) Any Industrial User [Hino] subject to a categorical Pretreatment Standard, after the compliance date of such Pretreatment Standard, or, in the case of a New Source, after commencement of the discharge into the POTW [City of Marion's collection system], shall submit to the Control Authority [ADEQ] during the months of June and December, unless required more frequently in the Pretreatment Standard or by the Control Authority [ADEQ]…a report indicating the nature and concentration of pollutants in the effluent which are limited by such categorical Pretreatment Standards. In addition, this report shall include a record of measured or estimated average and maximum daily flows for the reporting period for the Discharge

reported in paragraph (b)(4) of this section except that the Control Authority [ADEQ] may require more detailed reporting of flows."

These semi-annual reports are due by the close of business (post marked or via .pdf attachment to an e-mail to this office) on the last day of June and December of each year. This by no means Hino restricts to sampling/analyzing its regulated wastewater more often, but per 40 CFR 403.12(g)(6), "If an Industrial User subject to the reporting requirement in paragraph (e) or (h) of this section monitors any regulated pollutant at the appropriate sampling location more frequently than required by the Control Authority, using the procedures prescribed in paragraph (g)(5) of this section, the results of this monitoring shall be included in the report."

Question #2 – Where on the ADEQ website can I find the Semi-Annual Wastewater Pretreatment report form, and any other forms needed to satisfy the Wastewater Pretreatment reporting requirements for ADEQ?

A #2 - The Metal Finishers' semi-annual report form has been through several iterations in the past 25 years. Find attached the latest acceptable form that satisfies the reporting requirements in 40 CFR 403.12(e) which includes the minimum Federal Pretreatment standards to be met by Hino if it wishes to discharge to the Marion's sewage collection system/wastewater treatment plant (POTW).

Question #3 – Are there any instructions posted and available on the ADEQ website explaining how to properly fill out the Semi-Annual Wastewater Pretreatment report?

A #3 - Hopefully, the attached semi-annual report is self-explanatory. If there are ever any questions please feel free to contact this office. Please save the blank copy and rename it before filing subsequent semi-annual reports.

Question #4 – I want to obtain a better understanding of Total Toxic Organic (TTO) requirements and Toxic Organic Management Plan (TOMP) requirements based off of the Wastewater Pretreatment standard. When is a facility in compliance with signing the certification statement (40 CFR 433.12) in the Semi-Annual Wastewater report referencing managing Total Toxic Organic (TTO) and Toxic Organic Management Plan (TOMP)? When is a facility required to have a Toxic Organic Management Plan (TOMP)? Are wastewater samples required to be analyzed semi-annually for 2,3,7,8 – TCDD? I have reviewed the regulation pertaining to this, but I am still a little confused on what is required.

A #4 – Per the Metal Finishing standards in 40 CFR 433.12, "In lieu of requiring monitoring for TTO [total toxic organics], the permitting authority (or, in the case of indirect dischargers, the control authority [ADEQ]) may allow dischargers to make the following certification statement: "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or 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 discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan [TOMP] submitted to the permitting [or control] authority [ADEQ]…"

See 40 CFR 433 @ http://www.ecfr.gov/cgi-bin/text-idx?SID=bff05d9b4ea9b912c37164586f21078d&node=pt40.30.433&rgn=div5 .

Hino is not required to submit a TOMP. EPA recognized the fact the TTO scan would be expensive and placed the TOMP (best management plan) in the Metal Finishing standards to allow Metal Finishers to manage their toxic organics and keep them out of their wastestream. It is entirely up to the Metal Finisher to submit an approvable TOMP or continue to monitor for the TTOs.

Hino has not submitted an approvable TOMP to be eligible for the certification statement in lieu of monitoring for the TTOs. Numerous attempts have been made to send Hino examples of simple TOMPs to tailor for their operations/chemicals. No approvable TOMP has been received to date; therefore, Hino must adhere to monitoring for the TTO parameters in 40 CFR 433.11.

See EPA's "Guidance Manual for Implementing Total Toxic Organics (TTO) Pretreatment Standards" (9/85) at Guidance Manual for Implementing Total Toxic Organics (TTO) Pretreatment Standards (PDF) . There's four basic steps in drafting a TOMP shown in Chapter 4 although a thorough understanding of the TOMP is encouraged. Chapter 3.1.3 identifies "sources of Toxic Organics", mostly solvents, but may be contained in conveyor lube greases, hydraulic oils etc. Two approvable TOMP submittals are attached for your review, the 1st being the most descriptive of the facility's operations.

I hope I did not overload you with too many questions, but I just want to make sure that the report mentioned above is completed correctly, submitted on time, and is completed accurately according to the regulations.

If it would be better for you to discuss this information over the phone, then I will be willing to communicate with you over the phone. My contact information is listed at the end of this email. Just let me know which form of communication is more convenient and easier for you.

Thanks in advance for your assistance, and I look forward to hearing back from you.

Tommie T. Purifoy II
Production Manager
Hino Motors Manufacturing U.S.A., Inc.
100 Hino Blvd., Marion, AR 72364
Cell: (870) 635-2974
Desk: (870) 702-2303
Email: tpurifoy@hmmusa.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 # ARP00____

A. LEGAL NAME & MAILING ADDRESS

B. FACILITY & LOCATION ADDRESS

C. FACILITY CONTACT: **TELEPHONE NUMBER:** **e-mail:**

(2) REPORTING PERIOD--FISCAL YEAR From to (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

_____ & _____

B. PERIOD COVERED BY THIS REPORT

FROM: **TO:**

(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)*

LIST BELOW EACH PROCESS USED IN THE FACILITY

_____

_____

_____

_____

_____

_____

*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

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.

C. Number of Regular Employees at this Facility _____

D. [Reserved]

40 CFR 433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: _____

(4) FLOW MEASUREMENT

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge*
Regulated (Core &			
Regulated (Cyanide)			
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW			

***If batch discharged please list the period of time of each batch discharge (300 gallons/day; 500 gallons/week, 2,00(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									*
Avg Measured**									*

Sample Location _____

Sample Type (Grab* or Composite)_____
***If Grab, list # of grabs over what period of time**
Number of Samples and Frequency Collected_____

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.

_____
(Typed/Printed Name)

_____
(Corporate Officer or authorized representative signature)

Date of 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 including Best or Environmental Management Practices, Source Reduction, Waste Minimization, Lean Manufacturing, Water and/or Energy Conservaton:

1. _____

2. _____

3. _____

4. _____

5. _____

40 CFR 433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: _____

(8) GENERAL COMMENTS

(9) SEMI-ANNUAL/PERIODIC REPORT CERTIFICATION STATEMENT REQUIRED UNDER 40 CFR 403.12(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.

_____ _____

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE **SIGNATURE**

_____ _____

OFFICIAL TITLE **DATE SIGNED**

TOXIC ORGANIC MANAGEMENT PLAN

for

GREENVILLE TUBE COMPANY
CLARKSVILLE, ARKANSAS

July, 1998
Revised February, 2009

Prepared By:

OSWALD ENGINEERING, INC.

Revised By:

EEG, Inc.

Rec.
11-18-09
BS

TABLE OF CONTENTS

I. Description of Facilities and Solvent Use

A. Process Description

Greenville Tube Company (GTC) makes a variety of small diameter, stainless steel tubing products from "seamless hollows" and "welded hollows" and stainless steel strip (i.e., unfinished large-diameter tubes) at the Clarksville facility. These materials are used in a wide range of industrial applications, machinery, and equipment.

To begin production, the raw materials are cut to the desired length at a saw station. Particulate (i.e., metal dust) is generated during the cutting activities. The hollows are then drawn and trimmed to create the preliminary tubing products. The saw station for the initial cutting operation is equipped with a vent hood for the control of dust emissions.

The "seamless hollows" and "welded hollows" tubing are drawn into specified diameters. To prepare for drawing, one of five die rotary swager machines is used to form a point on one end of the tubing and a mandrel is manually installed into the tubing on the opposite end. The mandrel controls the wall thickness and inside diameter during the drawing process. The pointed end of the tubing is passed through a die on the draw bench and coupled to the drawing carriage. The carriage pulls the tubing through the die which decreases the outside and inside diameter of the tubing and increases its length. Simultaneously, the tubing is lubricated with drawing lubricants to facilitate its movement through the drawing die. The drawing mandrel is removed using one of five derodders and the swaged end is removed at one of two saw stations. The lubricated, coated drawn tube is transferred to the cleaning operation.

Coils of stainless steel strip are used to manufacture "as-welded" tubing products in a continuous manufacturing process. The strip is formed into a tube shape on a mill. The edges are then welded together to form a tube. The welded tube travels to an annealing oven with a Hydrogen atmosphere. The annealed tubes are quenched in an air atmosphere. On the #6 As Weld Mill the tube travels through the "conditioner", a series of ball bearings, to work the OD of the tube and eliminate the appearance of a weld line on the outside of the tube. The conditioning process introduces some lubricants to the outside of the tube which are removed by a wash with water and biodegradable detergent. The finished long lengths of tubing are then coiled or cut to length according to customer specifications.

Vapor Degreaser System – The vapor degreaser system does not use a halogenated solvent as defined by §63.461. The vapor degreaser system consists of a large degreasing chamber, two vapor supply tanks, two solvent soak tanks, a solvent distillation unit and a variety of ancillary equipment, chilled water system, vacuum pumps, heater exchanges, etc. The system also includes a natural gas-fired process heater and an 8,000 gallon solvent storage tank. A non-halogenated solvent, n-propyl bromide, is used as the cleaning agent. A solvent stabilizer is also processed. The stabilizer is stored in and dispensed from a drum.

The former Vapor Degreaser System – Soils generated from drawing activities were previously removed by a solvent cleaning machine (degreaser). A bundle of tubing was placed in a Baron Blakeslee Single Dip Degreaser containing trichloroethylene (TCE), also known as Trichloroethene. The old degreasing system including: the degreaser with distillation unit, a refrigeration compressor, a boiler, and a 9,000 gallon aboveground solvent storage tank. TCE has been removed from the facility after installation of the new solvent cleaning system.

The annealing process consists of heating and cooling the metal under precise controls to remove internal stresses; thus, producing a more ductile and less brittle material. Six annealing furnaces are fired using natural gas. GTC also operates an electric annealing furnace, an insignificant activity. It is used to heat-treat "as-welded" tubing. The oven chamber is blanketed with hydrogen gas.

In route to the passivator, the tubing is straightened, cut, deburred, and cleaned by pneumatic blasting with an abrasive compound.

Polishing and passivation processes are performed to minimize oxidation and discoloration of the outer and inner tubing surfaces. If required, the tubing is polished using an electric buffer unit. Water soluble metalworking fluids are used as lubricants. During passivation, the tubing is placed in a citric acid bath, rinsed in a water bath, and dried in a natural gas fired oven.

The main manufacturing area is long (1,000 feet) and narrow (80 feet). Offices, maintenance, machine shop, and boiler, compressor, and still rooms are attached to the east and west walls of the manufacturing area. The degreaser, which is located in the southeast corner of the building, sets in a vault that is 114.5 feet long by 10.2 feet wide. The floor of the vault is 8 feet below the day-floor of the building. This system is currently not in operation.

Water is used at the manufacturing facility for the following purposes: Sanitary, cooling, boiler makeup, passivator citric acid solution and passivator rinse.

All water supplied for sanitary use is supplied by the City of Clarksville. Two restrooms are located in the office area of the facility and one each at southeast end and northeast side of the manufacturing area. Sanitary wastewaters from these restrooms individually flow to the west side of the facility and discharge directly into the Clarksville sanitary sewer collection system.

City water is also provided to the boiler room located on the southeast side of the manufacturing area adjacent and north of the south restroom. The water is used for boiler makeup water. Boiler blow-down discharges into a floor drain which ties into the south restroom sanitary drain which discharges directly into the Clarksville sanitary sewer collection system.

In addition to the above uses of potable water supplied by the City of Clarksville, an emergency crossover connection to the process water supply has been installed. The connection is located along the west interior wall of the manufacturing area just east of the office south restroom. The connection is equipped with a backflow preventer and shut-off valve to protect the potable water supply.

Process cooling water is supplied via a closed looped system. Cooling water is pumped continuously through the closed loop system from the cooling tower discharge sump, through the system and back to the head of the cooling tower. City water is added to the system on an as needed basis to replace water lost due to cooling tower evaporation.

Process water for the passivator citric acid solution makeup and passivator rinse is obtained primarily from a ground water sump located at the south end of the vault beneath the degreaser. Groundwater beneath the property contains TCE and related degradation compounds. An air stripper has been installed as a ground water treatment system to reduce those compounds to an acceptable level prior to use as passivator rinse water. During periods of dry weather the ground water sump does mot provide the necessary process water volume for the citric acid solution makeup and passivator rinse waters.

During these dry periods city water is used as needed to augment the process supply. The rinse water tank overflow is currently discharged as wastewater to the Clarksville wastewater treatment facility. It is estimated that approximately 1,000 to 15,000 gallons of rinse water are discharged daily. Spent citric acid solution is neutralized and transported to an off-site treatment facility for metals recovery.

Attached is a layout drawing of the facility indicating the approximate location of significant water and wastewater lines.

B. Identification of Toxic Organic Chemicals Entering the Plant Wastewaters

1. Analysis of Treated Wastewaters

Original samples were taken of the rinse water overflow discharge and analyzed for the 126 toxic organics regulated under the metal finishing categorical pretreatment standards. Samples collected were 24 hour flow proportioned composite samples for acid extractable and base/neutral compounds, as well as volatile organics. Samples were taken over a period when all production lines were operating at normal production rates. Samples were analyzed by gas chromatography with compound identification and quantification by masspectrophotometer (GC/MS). EPA procedures 624, 625 and 608 were followed for GC/MS analysis. Only one toxic organic compound was detected at concentrations greater than 0.01 mg/l and is listed in Table 1.

Table 1

Compound	Concentration
Trichloroethene	0.0149mg/l (06/04-05/98)
Trichloroethene	0.0078mg/l (10/9/08)

A sample was collected on October 9, 2008, 24-hour time weighted composite for TCE results were 0.0078 mg/l. In addition to the above analysis the composite sample was analyzed for 40 CFR PART 433 metals. Grab samples were analyzed for O&G, TSS and Cyanide.

The recent laboratory analysis is enclosed in Attachment I.

2. Identification of Solvents Used in Manufacturing Operations

a. N-Propyl Bromide (NPB) – non-halogenated solvent contains bromides.

b. Calumet 142 F Naphtha R66 - contains petroleum naphtha solvent.

c American Enterprise Industries 289-S – contains ethers.

It is possible that any or all of the above compounds contain priority pollutants.
Material Safety Data Sheets for all of the above solvents are enclosed in Attachment II.

3. Identification of Other Potential Sources of Toxic Organic Pollutant Introduction to the Wastewater Treatment System

a. Inkjet T26R Ink - contains butyl benzyl phthalate and methyl ethyl ketone.

b. Inkjet 265-25 Makeup Fluid - contains methyl ethyl ketone.

c. Klean Strip Acetone - contains acetone.

d. Acetone Reagent ACS - contains acetone.

e. Lacquer Thinner - contains xylene or toluene.

f. Paint Thinner - contains xylene or toluene.

It is possible that any or all of the above compounds contain priority pollutants.

II. Description of Control Options Explored

A. Solvent Substitution

GTC has replaced TCE with NPB, which does not contain any toxic organic materials listed as a toxic organic Regulated Pollutant in 40 CFR PART 433 – Metal Finishing.

B. Process Modifications

Solvents are not used in processes which contribute directly to the manufacturing facility's wastewater discharge. The trace amount of the toxic organic found to be present in the treated wastewater is believed to be contributed by residual amounts of TCE remaining in the ground water after the ground water air stripping treatment system. There does not seem to be any practical alternative process modifications which would result in a potential reduction of solvents being discharged in the process wastewater.

C. Segregated Drain System

The manufacturing area is constructed with a segregated drain system allowing all sanitary wastewater to be directly discharged to the Clarksville collection system. All process cooling water is returned to the cooling tower via a separate collection system for reuse in the closed loop system. The potential of spills of toxic organics to the sanitary and rinse process wastewater stream is greatly reduced due to the segregated floor drain system.

D. Sealing Floor Drains

The possible introduction of toxic organics to wastewaters through floor drains could be greatly reduced if all floor drains were sealed. In some of the process areas this option is not feasible because large volumes of water are used as part of the process. Floor drains and cleanouts should be sealed in all areas where they are not required. Very few floor drains in the manufacturing areas have positive floor drainage to their locations, thus reducing the possibility of a spill of toxic organics reaching the wastewater stream.

The floor drain in the Boiler Room accepts boiler blowdown, and drains directly to the City sewer. The trichloroethylene still (Currently not in use) is also located in the Boiler Room. A curb is placed entirely around the drain to prevent any material which may drip or leak from the still from entering the drain.

E. Installing Sumps in the Floor Drains

The degreaser is located in a vault capable of containing any major spill from the unit. If a spill occurred the vault would contain the spill that could be removed and recovered.

F. Spill Clean-up Equipment and Material Storage Stations

As part of this Toxic Organic Management Plan the plant manager shall issued a memorandum to all employees that reads as follows:

> ***"Subject: Accidental Discharge to Sewer***
>
> ***Under no circumstances should any solvents or other liquids other than ongoing process water, be allowed to discharge into a drain fixture that will enter into the sewer system.***

Should an accidental spill of any questionable liquid occur, every attempt should be made to contain the liquid by use of floor dry, mops or other means and the residue should be transferred to 55 gallon drums.

In case of an accidental spill that discharges into the sewer system, the employee(s) should contact their foreman as to quantity and type of spill involved. This information will be forwarded to either of the following:

Amber Parham
Clint Blunier

This requirement is mandatory under the Federal Clean Water Act of 1977."

Oil dry, a clay based absorbent, is distributed throughout the manufacturing area to provide spill containment and removal. The spent absorbent is broomed and shoveled into a 55 gallon drum for storage and proper disposal.

III. Toxic Organic Management Plan

As a result of the above analysis, GTC believes that all of its toxic organic pollutant discharges can be controlled by a solvent and toxic organic compound management plan in lieu of routine organics monitoring.

A. Solvent Substitution

GTC has discontinued the use of TCE. The current chemical, a non-halogenated solvent, n-propyl bromide, is used as the cleaning agent. A solvent stabilizer is also processed. The stabilizer is stored in and dispensed from a drum located inside a secondary containment.

These chemicals do not contain toxic organic materials. At the present time, GTC believes the TCE solvents should be kept as a potential solvent used in the process in the event of a failure of the current non-halogenated solvent

B. Process Changes

Solvents are not used in processes which contribute to the manufacturing facility's wastewater discharge. There does not seem to be any alternative process modifications which would result in a reduction of solvents or toxic organic compounds being discharged in the process wastewater.

C. Solvent Storage Procedures

All solvents are stored in curbed bulk storage areas inside the plant and under roof on the exterior of the manufacturing building. Solvents are unloaded directly from commercial carriers to the bulk storage vessels. No active floor drains are located near these areas. All storage areas are curbed and contain no floor drains.

D. Sealing Floor Drains

Floor drains and cleanouts are sealed in all areas where they are not required. In the Boiler Room, a curb has been placed entirely around the drain to prevent any material which may drip or leak from the trichloroethylene still from entering the floor drain.

E. Sumps in Process Areas

The degreaser is located in a vault capable of containing any major spill from the unit. If a spill occurs, the existing sump pump is to be turned off and the spilled material removed and recovered.

F. Spill Clean-up Equipment and Material Storage Stations

The plant is currently equipped throughout the manufacturing area with clay based absorbent to aid in the containment and removal of any toxic organic spill. All employees have been notified by memorandum as to current procedures to be implemented should a spill occur (refer to Section II.F. above).

G. Spent Solvent Disposal Practices

Spent solvents and still bottoms are collected in 55 gallon drums, sealed, and stored in a curbed storage area. The storage area has no floor drains. Spent solvents and still bottoms are shipped to a licensed regulated and/or hazardous waste disposer for reclamation and/or reuse.

All shop clothes used in association with solvents are collected in 55 gallon drums and commercially laundered for reuse.

H. Training

All personnel involved in using, handling, and clean-up activities will receive instruction in the proper handling and disposal of solvents, toxic organic compounds and clean-up materials in order to keep regulated toxic organics out of industrial wastewater. New employees will be trained in these procedures immediately. All personnel working in these activities are familiar with this toxic organic management plan and will follow the procedure established in that standard to eliminate regulated organics from entering the water wash system.

Training consists of classroom instruction which reviews the following:

1. The solvents and toxic organic compounds known to be in use at the plant and the areas in which they are transported, stored, and used.

2. The location of active floor drains and the location and understanding of the pretreatment wastewater system for the plant.

3. The Toxic Organic Management Plan and the proper procedures for handling and disposing of solvents and paint compounds.

I. Inspections

1. Transportation, storage, and use areas will be inspected routinely by the area supervisor to verify cleaning procedures and adherence to this Toxic Organic Management Plan to insure that toxic organics do not spill or leak into plant sewers.

2. Solvent handling, reuse, and collection areas, as well as raw material and waste solvent storage areas, will be inspected weekly by a designated environmental representative to verify proper solvent storage, handling, and collection. A log of inspections and sign-off will be maintained by the designated environmental representative.

J. Implementation

All provisions of this revised plan will be fully implemented by September 30, 2009.

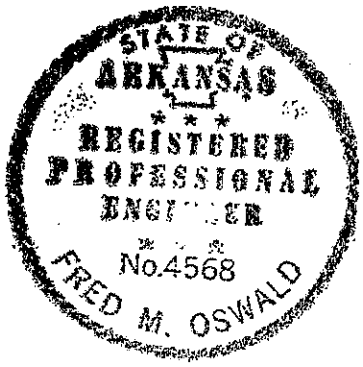
IV. Certification

"Based on my inquiry of the person or persons directly responsible for managing compliance with the TTO limitations, 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 report. I further certify that this facility is implementing this toxic organic pollutant management plan submitted to the Control Authority on 11/18, 2009."

Clint Blunier
Plant Manager
Greenville Tube Company
Telephone: (479) 754-6500

Prepared by:

Fred M. Oswald, P.E.
State of Arkansas
Registered Professional
Engineer No. 4568



DEFIANCE METAL PRODUCTS
TOXIC ORGANIC MANAGEMENT PLAN
6/29/2009

REF #	PRODUCT NAME	DEPT.	REGULATED CONSTITUENT	%	DISPOSAL METHOD	USAGE AMOUNT
353	Mineral Spirits	Spot/FBC	Naphtha	100	Evaporation during part cleaning	1 gal/yr
355	DP90LF (Paint)	Spot/FBC	Toluene Naphtha 1,2,4 Trimeythylbenzene	3 to 7 1 to 5 1 to <5	Consumed during part touch up	20 gals/yr
357	Lacquer Thinner	Spot/FBC	Toluene Acetone	56 to 57 21 to 22	Consumed during part touch up	15 gals/yr
444	Aeroshell Fluid 12	CNC	Barium Dinonylmaphalene Sulf. Butylated Hydroxy Toluene	2 to 4 1 to 1.5	Consumed during equip cleaning	1 gal/yr
451	Penetrating Cat	CNC	Naphthalene	1 to 7	Consumed during equip cleaning	1/2 gal/yr
515	Citgo Oil 68	Plant	Naphthalene	20 to 40	Used in machines/hauled offsite	
703	ED Black Spray Paint	Ecoat	Ethylbenzene	1 to 3	Consumed during part touch up	1440 cans/yr.
704	Liq. Paint (all colors)	Plant	Ethylbenzene	9	Evaporation/Equipment Repair	15 gals/yr
715	Moly HD Grease	Brakes	Naphthenic	40 to 100	Consumed in machines	36 tubes/yr
885	AntiSplatter	Weld	Methylene Chloride	73 to 84	Consumed during weld process	18 gals/yr
954	Marking Paint	Maint.	Toluene Naphtha	13 4	Consumed w/aisle markings	15 gals/yr
961	Forane ® 22	Maint.	Chorodifloromethane	100	Consumed in Air Conditioners	1 cylinder/yr

TOM?

DEFIANCE METAL PRODUCTS
TOXIC ORGANIC MANAGEMENT PLAN
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REF #	PRODUCT NAME	DEPT.	REGULATED CONSTITUENT	%	DISPOSAL METHOD	USAGE AMOUNT
964	PVC Cement	Maint.	Acetone	5 to 20	Consumed w/PVC repairs	1 gal/yr
970	RustControlSpr.Paint	Maint.	Methlylene Chloride Xylene	10 5	Consumed on equip. repairs	12 cans/yr
980	Paint/Finish Remover	Maint.	Toluene Methlylene Chloride	18 16	Consumed on equip. repairs	2 gals/yr
990	PVC Cleaner	Maint.	Acetone	>50	Consumed w/PVC repairs	1 gal/yr
993	Enamel Spray Paint	Maint.	Toluene Acetone Ethylbenzene	1 to 5 1 to 5 1 to 5	Consumed on equip. repairs	6 cans/yr
995	Anti-SeizeLube	Maint.	Naphtha	1 to 5	Consumed on equip. repairs	16 oz./yr
996	Enamel Spray Paint	Maint.	Naphtha Ethylbenzene 1,2,4-Trimethylbenzene	10 6 1	Consumed on equip. repairs	12 cans/yr
999	Dupli Color Paint	Maint.	Toluene Acetone	11 14	Consumed on office walls	15 gals/yr
1000	Kilz Paint		Naphtha	14	Consumed on office walls	5 gals/yr
1003	Carb. Parts Cleaner	Maint.	Methlylene (Dichloromethane)Chl.	40 to 45	Consumed on equip/parts	24 cans/yr
1018	GreaseLess Lube	Maint.	Petroleum Naphtha	20 to 30	Consumed in machines	12 cans/yr
1023	Acetone	Maint.	Acetone	99.5	Consumed w/Lab equip cleaning	4 gals/yr

DEFIANCE METAL PRODUCTS
TOXIC ORGANIC MANAGEMENT PLAN
6/29/2009

REF #	PRODUCT NAME	DEPT.	REGULATED CONSTITUENT	%	DISPOSAL METHOD	USAGE AMOUNT
1047	Bix-SprayOnStripper	Maint.	Dichloromethane Toluene Acetone	30 to 50 10 to 20 1 to 10	Consumed during cleaning floors	2 gals/yr
1048	Armorseal Floor Plex	Maint.	Naphthalene	0.2	Consumed for floor repair	12 tubes/yr
1055	Paint Reducer	Maint.	Ethylbenzene	8	Consumed on office walls	5 gals/yr

A survey of the plant and a review of all MSDS found Toxic Organics in the above referenced products. An evaluation of their usage was conducted and found that none of these products enter the waste stream to the POTW. All plant floor drains have been sealed by previous owners. There are 5 spill kits located through out the plant.

"Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic orgaics (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 discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the Arkansas Department of Environmental Quality".

"I certify under penalty of law that the information submitted herein is, to the best of my knowledge and belief, true, accurate and complete".

Devin McSpadden (Plant Mgr) 6/30/2009

Bob Taylor (Safety Leader) 6-29-09