#### Wilson, Tabatha

From: Gilliam, Allen

**Sent:** Tuesday, July 23, 2013 3:49 PM

**To:** jbrown@hmmusa.com

Cc: erowlett@hmmusa.com; SWalker@hmmusa.com; Fuller, Kim; Wilson, Tabatha; marion

jim shempert

**Subject:** AR0021971\_Hino Motors ARP001025 June 2013 semi annual Pretreatment report Late

resampling for limit violation 
Improper certification and ADEQ corrected reply\_

20130723

Attachments: Hino Motors AR001025 June 2013.pdf; Metal results June 2013.pdf

Bo,

Your June 2013 semi-annual Pretreatment report was received and deemed non-compliant with the Pretreatment Reporting Requirements in 40 CFR 403.12 with the first report indicated a violation of the Metal Finishing Zn monthly average limit of 1.48 mg/l and an improperly signed certification statement.

Hino Motors is cited in violation of:

- 1) the Metal Finishing monthly average Zinc limit in 40 CFR 433.17;
- 2) the 24 hr. notification requirement (to ADEQ) per 40 CFR 403.12(g)(2) and
- 3) the repeat sampling and submittal of results (to ADEQ) within 30 days after becoming aware of the violation per 40 CFR 403.12(g)(2)
- 4) improperly signing the certification statement (per 40 CFR 433.12) stating "Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation 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 [ADEQ]." This TOMP has not been submitted; therefore, not approved.

The second attachment, albeit late does show Zinc levels were back in compliance.

Please submit a probable explanation for the Zinc excursion and Hino's corrective action within thirty (30) working days from the date on this correspondence.

For future information Hino's paraphrased Pretreatment Reporting requirements in 40 CFR 403.12 are:

(e) Periodic reports on continued compliance. (1) [Hino] shall submit to [ADEQ] during the months of June and December, unless required more frequently...by [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...;

- (f) Notice of potential problems, including slug loading. [Hino] shall notify the POTW [City wastewater official first, then ADEQ] immediately of all discharges that could cause problems to the POTW, including any slug loadings, as defined by §403.5(b), by the Industrial User;
- (g) Monitoring and analysis to demonstrate continued compliance.
- (2) If sampling performed by [Hino] indicates a violation, [Hino] shall notify the [ADEQ] within 24 hours of becoming aware of the violation. [Hino] shall also repeat the sampling and analysis and submit the results of the repeat analysis to the [ADEQ] within 30 days after becoming aware of the violation...;
  (6) If [Hino] monitors any regulated pollutant at the appropriate sampling location more frequently than required by [ADEQ] the results of this monitoring shall be included in the report:
- (j) Notification of changed Discharge. [Hino] shall promptly notify the [ADEQ and the appropriate City wastewater official] in advance of any substantial change in the volume or character of pollutants in their Discharge, including the listed or characteristic hazardous wastes for which [Hino] has submitted initial notification under paragraph (p) of this section;
- (o) Record-keeping requirements. (1) [Hino] shall maintain records of all information resulting from any monitoring activities required by this section, including documentation associated with Best Management Practices. Such records shall include for all samples: (i) The date, exact place, method, and time of sampling and the names of the person or persons taking the samples; (ii) The dates analyses were performed; (iii) Who performed the analyses; (iv) The analytical techniques/methods use; and (v) The results of such analyses;
- (2) [Hino] shall be required to retain for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this section) and shall make such records available for inspection and copying by [ADEQ]. This period of retention shall be extended during the course of any unresolved litigation regarding [Hino] or when requested by the [ADEQ]...; and
- (p)(1) [Hino] shall notify the POTW (City), the EPA Regional Waste Management Division Director, and [ADEQ] hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261."

As a professional courtesy and as may be required by the City receiving your process wastewater, some or all of the reports above should be copied to the appropriate City wastewater official.

If there are any questions or concerns please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Jim Shempert, City of Marion Utility Manager

E/NPDES/NPDES/Pretreatment/Reports

From: jbrown@hmmusa.com [mailto:jbrown@hmmusa.com]

**Sent:** Wednesday, June 26, 2013 4:28 PM

To: Gilliam, Allen

Cc: erowlett@hmmusa.com; SWalker@hmmusa.com

**Subject:** Semi annual report

Allen,

Sorry it has taken so long to get you the report.

Attached is our semi annual report for reporting months January - June.

I have included the results of the retest for the metals and everything tested okay.

Please let me know if you have any questions.

Regards,

Bo Brown Manager Production Maintenance Hino Motors Mfg. Cell-870-635-0400 Office-870-702-3021

#### 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 A. LEGAL NAME & MAILING ADDRESS B. FACILITY & LOCATION ADDRESS **Hino Motors Manufacturing USA LLC Hino Motors Manufacturing USA LLC** 100 Hino Blvd. 100 Hino Blvd. Marion, AR 72364 Marion, AR 72364 Jimmy (Bo) Brown TELEPHONE NUMBER: 870-635-0400 e-mail: jbrown@hmmusa.com C. FACILITY CONTACT: (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 January & June FROM: January 2013 TO: June 2013 (3) DESCRIPTION OF OPERATION A. REGULATED PROCESSES **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. 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

D. [Reserved]

C. Number of Regular Employees at this Facility 304

#### (4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge		
Regulated (Core &	6,044		Batch per 8 hrs.		
Regulated (Cyanide)					
' 403.6(e)					
' 403.6(e) Dilute					
Cooling Water					
Sanitary	20 gal. per person		Continuous		
Total Flow to POTW	12,124 gallons		Continuous		

<sup>\*</sup>If batch discharged please list the period of time between each batch discharge. Do not normalize over that period for the average flow.

(	5)	MEA	SURE	MENT (	OF PO	LLUTA	ANTS

A. TYPE OF TREATMENT SYSTEM

B. COMMENTS ON TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

The regulated process waste is not mixed with sanitary waste at time of metering.

x Neutralization

Chemical Precipitation and Sedimentation

**Chromium Reduction Cyanide Destruction** 

X Other Filter Press

None

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.

Avg Measured**				-					*
Max Measured	<0.010	0.124	2.01	0.089	0.340	<0.025	14.4	0.010	Toxic organic scan attached
Monthly Avg	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	
Max for 1 day	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
40 CFR 433.17 Pollutant(mg/l) limits	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*

Sample Location Pretreatment Discharge Tank

Sample Type (Grab\* or Composite) Grab

\*If Grab, list # of grabs over what period of time

Number of Samples and Frequency Collected 6 Samples taken Semi Annual

40CFR136 Preservation and Analytical Methods Use: X 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

for the average flow.

\*\*"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

#### 40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: Hino Motors Manufacturing USA LLC

3. C	HECK ONE: G '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED G '433.12(a) TTO CERTIFICATIO
	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, I 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.
	Jimmy (Bo ) Brown (Typed/Printed Name)  Long Bo Brown (Corporate Officer or authorized representative signature)  Date of Signature 6.26-2013
ORP	STATE OF ARKANSAS ) COUNTY OF
	Before me, the undersigned authority, on this day personally appeared
	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, 200
	Notary Public in and for County, Arkansas
	My commission expires

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]

#### 40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: Hino Motors Manufacturing USA LLC

'6602 [42 U.S.C. 13101] Findings and Policy para (b) Policy.—The Congress hereby declares it to be whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe nenvironmentally safe manner whenever feasible; and disposal or other release into the environment sl	anner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an
The User may list any new or ongoing Pollution Prevention practices, Source Reduction, Waste Minimization, Lean Manufactu	
1	
2	
3	
4	
5	
(8) GENERAL COMMENTS	
persons who manage the system, or those persons directly re	opervision in accordance with a system designed to assure formation submitted. Based on my inquiry of the person or esponsible for gathering the information, the information eccurate, and complete. I am aware that there are significant
Jimmy (Bo) BrownNAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTA	firmy Bo Brown SIGNATURE
Maintenance ManagerOFFICIAL TITLE	6-25-2013 DATE SIGNED



\*A Laboratory Management Partner

(901) 213-2400

Fax (901) 213-2440

3/28/2013

Hino Motor Manufacturing USA, Inc. Mr. Jerry McPherson 100 Hino Blvd Marion, AR, 72364

Ref:

**Analytical Testing** 

ETC Report Number: 13-074-0272

Client Project Description: Analytical Testing

Project #03152013

Dear Mr. Jerry McPherson:

Environmental Testing and Consulting, Inc. received sample(s) on 3/15/2013 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method.

The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an asreceived basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,

Rendell H. Thomas

Randy Thomas Project Manager

Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.

#TN02027 EPA

Kentucky UST #41



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Client: Hino Motor Manufacturing USA, Inc.

Project: Analytical Testing

Lab Report Number: 13-074-0272

Date: 3/28/2013

**CASE NARRATIVE** 

#### **Organochlorine Pesticides Method EPA-608**

Sample 96773 (C/W Before)

Surrogate(s) was flagged for recovery outside QC limits in this project sample. This sample was re-analyzed for verification, and/or dilution of target analytes. Batch QC samples (method blank and laboratory control samples) all showed surrogates within QC limits.

#### Extraction and Conc for EPA-608 Method EPA-608 (PCB Prep)

The weight/volume extracted was reduced during the extraction procedure due to the nature of the sample. Reporting limits are factored for the sample size reduction.

#### Organochlorine Pesticides and PCBs Method EPA-608 (PCB)

Surrogate(s) was flagged for recovery outside QC limits in this project sample. This sample was re-analyzed for verification, and/or dilution of target analytes. Batch QC samples (method blank and laboratory control samples) all showed surrogates within QC limits.

#### Extraction and Conc for EPA-608 Method EPA-608 (PREP)

The weight/volume extracted was reduced during the extraction procedure due to the nature of the sample. Reporting limits are factored for the sample size reduction.

#### Volatile Organic Compounds - GC/MS Method EPA-624

Surrogate(s) was flagged for recovery outside QC limits in this project sample. This sample was re-analyzed for verification, and/or dilution of target analytes. Batch QC samples (method blank and laboratory control samples) all showed surrogates within QC limits.

#### Semivolatile Organic Compounds - GC/MS Method EPA-625

Sample requires dilution due to high levels of non-target analytes.

This sample extract was unable to be concentrated to the default method final volume. The final volume adjustment due to viscous extracts may result in surrogate recoveries outside QC limits.

#### Extraction and Conc. for 625 Method EPA-625 (PREP)

The weight/volume extracted was reduced during the extraction procedure due to the nature of the sample. Reporting limits are factored for the sample size reduction.

This sample extract was unable to be concentrated to the default method final volume. The final volume adjustment due to viscous extracts may result in surrogate recoveries below the minimum detectable concentration.



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Hino Motor Manufacturing USA, Inc. Mr. Jerry McPherson

100 Hino Blvd Marion, AR 72364

Project **Analytical Testing** Information: Project #03152013 Report Date: 03/28/2013

Received: 3/15/2013

Rendell H. Thomas

Report Number: 13-074-0272

REPORT OF ANALYSIS

Randy Thomas Project Manager

Lab No: 96773

Sample ID : C/W Before

Matrix: Aqueous

Sampled: 3/15/2013 11:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
Total Cyanide	0.010	mg/L	0.010	1	03/19/13 09:00	NRT	4500-CN-E
Total Cadmium	<0.010	mg/L	0.010	1	03/26/13 00:40	BKN	EPA-200.7
Total Chromium	0.124	mg/L	0.025	1	03/27/13 15:50	BKN	EPA-200.7
Total Copper	2.01	mg/L	0.025	1	03/27/13 15:50	BKN	EPA-200.7
Total Lead	0.089	mg/L	0.030	1	03/26/13 00:40	BKN	EPA-200.7
Total Nickel	0.340	mg/L	0.025	1	03/26/13 00:40	BKN	EPA-200.7
Total Silver	<0.025	mg/L	0.025	1	03/26/13 00:40	BKN	EPA-200.7
Total Zinc	14.4	mg/L	0.050	1	03/26/13 00:40	BKN	EPA-200.7



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Mr. Jerry McPherson 100 Hino Blvd Marion, AR 72364

Project

**Analytical Testing** Information: Project #03152013 Report Date: 03/28/2013

Received: 3/15/2013

Rendell H. Thomas

Report Number: 13-074-0272

REPORT OF ANALYSIS

Randy Thomas Project Manager

Lab No: 96773

Sample ID : C/W Before

Matrix: Aqueous

Sampled: 3/15/2013 11:00

Analytical Method: **Prep Method:** EPA-608 (PREP) Prep Batch(es): L158371 Date/Time Prepped: 3/18/2013 16:15:00 Test Results Units MOL Date / Time Analytical Analyzed Batch Aldrin < 0.160 µg/L 0.160 10 03/19/13 18:14 L158594 alpha-BHC µg/L < 0.160 0.160 03/19/13 18:14 VIC L158594 beta-BHC µg/L < 0.160 0.160 10 03/19/13 18:14 VIC L158594 delta-BHC µg/L < 0.160 0.160 03/19/13 18:14 VIC L158594 Chlordane <0.800 µg/L 0.800 03/19/13 18:14 10 VIC L158594 4,4'-DDD < 0.160 µg/L 0.160 03/19/13 18:14 L158594 4,4'-DDE µg/L < 0.160 0.160 03/19/13 18:14 VIC L158594 4,4'-DDT < 0.160 µg/L 0.160 10 03/19/13 18:14 VIC L158594 Dieldrin µg/L < 0.160 0.160 03/19/13 18:14 L158594 Endosulfan I µg/L 0.160 10 03/19/13 18:14 < 0.160 VIC L158594 Endosulfan II µg/L 10 < 0.160 0.160 03/19/13 18:14 VIC L158594 Endosulfan Sulfate < 0.160 µg/L 0.160 03/19/13 18:14 VIC L158594 Endrin µg/L < 0.160 0.160 10 03/19/13 18:14 VIC L158594 Endrin Aldehyde < 0.160 µg/L 0.160 03/19/13 18:14 L158594 gamma-BHC < 0.160 µg/L 0.160 03/19/13 18:14 VIC L158594 Heptachlor < 0.160 µg/L 0.160 03/19/13 18:14 10 VIC L158594 Heptachlor Epoxide < 0.160 µg/L 0.160 10 03/19/13 18:14 L158594 Toxaphene <1.20 µg/L 1.20 10 03/19/13 18:14 VIC L158594 Surrogate: Decachlorobiphenyl 3.33 \* Limits: 36-116% 10 03/19/13 18:14 VIC L158594 Surrogate: Tetrachloro-m-xylene 8.33 \* Limits: 25-123% 10 03/19/13 18:14 VIC L158594

Qualifiers/ **Definitions** 

Outside QC limit

Ι

Q

Recovery out of range

RPD >40% dual column results

DF MQL Dilution Factor



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Hino Motor Manufacturing USA, Inc. Mr. Jerry McPherson

100 Hino Blvd Marion , AR 72364 . . . . . .

Project

Analytical Testing

Report Date: 03/28/2013 Received: 3/15/2013

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Information: Project #03152013

Rendell H. Thomas

Report Number : 13-074-0272

REPORT OF ANALYSIS

Randy Thomas Project Manager

Lab No : 96773

Sample ID : C/W Before

Matrix: Aqueous

Sampled: 3/15/2013 11:00

Analytical Method:	624							
Prep Method:	EPA-624 (PREP)	Pro	ep Batch(es):	L158905	Date/1	Time Prepped:	3/21/2	2013 23:58:00
Test		Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
Acrolein		<20.0	μg/L	20.0	1	03/21/13 21:44	SEB	L158908
Acrylonitrile		<20.0	μg/L	20.0	1	03/21/13 21:44	SEB	L158908
Benzene		<1.00	µg/L	1.00	1	03/21/13 21:44	SEB	L158908
Bromodichloromethane		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
Bromoform		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
Bromomethane		<1.00	µg/L	1.00	1	03/21/13 21:44	SEB	L158908
Carbon Tetrachloride		<1.00	µg/L	1.00	1	03/21/13 21:44	SEB	L158908
Chlorobenzene		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
Chlorodibromomethane		<1.00	µg/L	1.00	1	03/21/13 21:44	SEB	L158908
Chloroethane		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
2-Chloroethylvinyl Ether		<5.00	μg/L	5.00	1	03/21/13 21:44	SEB	L158908
Chloroform		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
Chloromethane		<1.00	μg/L	1,00	1	03/21/13 21:44	SEB	L158908
1,2-Dichlorobenzene		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
1,3-Dichlorobenzene		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
1,4-Dichlorobenzene		1.97	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
1,1-Dichloroethane		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
1,2-Dichloroethane		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
1,1-Dichloroethene		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
cis-1,2-Dichloroethene		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
trans-1,2-Dichloroethene		<1.00	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
1,2-Dichloroethene (Tota	al)	<1.00	μg/L	1.00	1	03/21/13 21:44		

Qualifiers/ Definitions Outside QC limit

Q

Recovery out of range

RPD >40% dual column results

DF

Dilution Factor



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**Analytical Testing** Information: Project #03152013 Report Date: 03/28/2013

Received: 3/15/2013

Rendell H. Thomas

Report Number: 13-074-0272

REPORT OF ANALYSIS

Randy Thomas Project Manager

Lab No: 96773

Sample ID : C/W Before

Matrix: Aqueous

Sampled: 3/15/2013 11:00

Analytical Method: 624								
Prep Method: EPA	4-624 (PREP)	Prep Ba	atch(es):	L158905	Date/T	ime Prepped:	3/21/20	13 23:58:00
Test	Resu	ilts	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
1,2-Dichloropropane	<1.0	00	µg/L	1.00	1	03/21/13 21:44	SEB	L158908
cis-1,3-Dichloropropene	<1.0	0	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
trans-1,3-Dichloropropene	<1.0	0	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
1,3-Dichloropropene (Total)	<1.0	0	μg/L	1.00	1	03/21/13 21:44		
Ethylbenzene	<1.0	0	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
Methylene Chloride	<10.	0	µg/L	10.0	1	03/21/13 21:44	SEB	L158908
1,1,1,2-Tetrachloroethane	<1.0	0	µg/L	1.00	1	03/21/13 21:44	SEB	L158908
1,1,2,2-Tetrachloroethane	<1.0	0	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
Tetrachloroethene	<1.0	0	µg/L	1.00	1	03/21/13 21:44	SEB	L158908
Toluene	<5.0	0	µg/L	5.00	1	03/21/13 21:44	SEB	L158908
1,1,1-Trichloroethane	<1.0	0	µg/L	1.00	1	03/21/13 21:44	SEB	L158908
1,1,2-Trichloroethane	<1.0	0	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
Trichloroethene	<1.0	0	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
Vinyl Chloride	<1.0	0	μg/L	1.00	1	03/21/13 21:44	SEB	L158908
Surrogate: 4-Bromot	luorobenzene	55.8 *	ĸ	Limits: 71-131%		1 03/21/13 21:4	4 SEB	L158908
Surrogate: Dibromof	luoromethane	99.4		Limits: 70-128%	C.	1 03/21/13 21:4	4 SEB	L158908
Surrogate: 1,2-Dichl	oroethane - d4	127		Limits: 67-136%		1 03/21/13 21:4	4 SEB	L158908
Surrogate: Toluene-	d8	70.4		Limits: 70-130%		1 03/21/13 21:4	4 SEB	L158908

Qualifiers/ **Definitions** 

Outside QC limit

Recovery out of range

Q RPD >40% dual column results DF

Dilution Factor

MQL



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10349

Hino Motor Manufacturing USA, Inc. Mr. Jerry McPherson

100 Hino Blvd Marion , AR 72364 Project

**Analytical Testing** 

Information: Project #03152013

Report Date: 03/28/2013

Received: 3/15/2013

Rendell H. Thomas

Report Number: 13-074-0272

REPORT OF ANALYSIS

Randy Thomas Project Manager

Lab No:

96773

Sample ID : C/W Before

Matrix: Aqueous

Sampled: 3/15/2013 11:00

Analytical Method: 625							
Prep Method: 625	Pro	ep Batch(es):	L158757	Date/1	ime Prepped:	3/21/2	013 09:30:00
Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
Acenaphthene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
Acenaphthylene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
Anthracene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
Benzidine	<8000	μg/L	8000	10	03/21/13 17:01	NFP	L158861
Benzo(a)anthracene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
Benzo(a)pyrene	<800	µg/L	800	10	03/21/13 17:01	NFP	L158861
Benzo(b)fluoranthene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
Benzo(g,h,i)perylene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
Benzo(k)fluoranthene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
Bis(2-Chloroethoxy)methane	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
Bis(2-Chloroethyl)ether	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
Bis(2-Chloroisopropyl)ether	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
Bis(2-ethylhexyl)phthalate	<4000	μg/L	4000	10	03/21/13 17:01	NFP	L158861
4-Bromophenyl phenyl ether	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
Butyl benzyl phthalate	<2000	µg/L	2000	10	03/21/13 17:01	NFP	L158861
1-Chloro-3-methylphenol	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
2-Chloronaphthalene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
2-Chlorophenol	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
I-Chlorophenyl phenyl ether	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
Chrysene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
Dibenz(a,h)anthracene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
1,2-Dichlorobenzene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861

Qualifiers/ **Definitions** 

Outside QC limit

Q

Recovery out of range

RPD >40% dual column results

DF Dilution Factor



2790 Whitten Road

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10349

Hino Motor Manufacturing USA, Inc. Mr. Jerry McPherson

100 Hino Blvd Marion , AR 72364 Project Analytical Testing
Information: Project #03152013

Report Date: 03/28/2013 Received: 3/15/2013

Rendell H. Thomas

Report Number: 13-074-0272

REPORT OF ANALYSIS

Randy Thomas Project Manager

Lab No : **96773** 

Sample ID : C/W Before

Matrix: Aqueous

Sampled: 3/15/2013 11:00

Analytical Method: 625							
Prep Method: 625	Pro	ep Batch(es):	L158757	Date/1	ime Prepped:	3/21/2	013 09:30:00
Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
1,3-Dichlorobenzene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
1,4-Dichlorobenzene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
3,3'-Dichlorobenzidine	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
2,4-Dichlorophenol	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
Diethyl phthalate	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
Dimethyl phthalate	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
2,4-Dimethylphenol	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
Di-n-butyl phthalate	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
1,6-Dinitro-2-methylphenol	<4000	μg/L	4000	10	03/21/13 17:01	NFP	L158861
2,4-Dinitrophenol	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
2,4-Dinitrotoluene	<2000	µg/L	2000	10	03/21/13 17:01	NFP	L158861
2,6-Dinitrotoluene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
Di-n-Octyl Phthalate	<2000	µg/L	2000	10	03/21/13 17:01	NFP	L158861
1,2-Diphenylhydrazine/Azobenzene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
Fluoranthene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
Fluorene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
Hexachlorobenzene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
Hexachlorobutadiene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
lexachlorocyclopentadiene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861
lexachloroethane	<2000	μg/L	2000	10		NFP	L159018
ndeno(1,2,3-cd)pyrene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861
sophorone	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861

Qualifiers/ Definitions

Outside QC limit

I Recovery out of range

RPD >40% dual column results

DF Dilution Factor

MQL N



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10349

Hino Motor Manufacturing USA, Inc.

Mr. Jerry McPherson 100 Hino Blvd Marion, AR 72364

Project

**Analytical Testing** Information: Project #03152013 Report Date: 03/28/2013

Received: 3/15/2013

Rendell H. Thomas

Report Number: 13-074-0272

REPORT OF ANALYSIS

Randy Thomas Project Manager

Lab No:

Sample ID : C/W Before

Matrix: Aqueous

Sampled: 3/15/2013 11:00

Analytical Method: 625								
Prep Method: 625	Pro	ep Batch(es):	L158757	Date/T	îme Prepped:	3/21/20	13 09:30:00	
Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch	
Naphthalene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861	
Nitrobenzene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861	
2-Nitrophenol	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861	
4-Nitrophenol	<8000	μg/L	8000	10	03/21/13 17:01	NFP	L158861	
N-Nitrosodimethylamine	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861	
N-Nitrosodiphenylamine	<4000	μg/L	4000	10	03/21/13 17:01	NFP	L158861	
N-Nitroso-di-n-propylamine	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861	
Pentachlorophenol	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861	
Phenanthrene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861	
Phenol	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861	
Pyrene	<800	μg/L	800	10	03/21/13 17:01	NFP	L158861	
1,2,4-Trichlorobenzene	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861	
2,4,6-Trichlorophenol	<2000	μg/L	2000	10	03/21/13 17:01	NFP	L158861	
Surrogate: 2-Fluorobiphenyl	4:	3.5	Limits: 38-107%	i i	10 03/21/13 17:0	1 NFP	L158861	
Surrogate: 2-Fluorophenol	2.	5.0	Limits: 8-88%		10 03/21/13 17:0	1 NFP	L158861	
Surrogate: Nitrobenzene-d5	27	7.5 *	Limits: 29-105%		10 03/21/13 17:0	1 NFP	L158861	
Surrogate: Phenol-d6	20	5.1	Limits: 7-58%	- (	10 03/21/13 17:0	1 NFP	L158861	
Surrogate: 4-Terphenyl-d14	63	3.0	Limits: 30-130%		10 03/21/13 17:0	1 NFP	L158861	
Surrogate: 2,4,6-Tribromophenol	72	2.1	Limits: 16-138%		10 03/21/13 17:0	1 NFP	L158861	

Qualifiers/ **Definitions** 

Outside QC limit

Recovery out of range

RPD >40% dual column results

DF

**Dilution Factor** 

MQL



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Hino Motor Manufacturing USA, Inc.

Mr. Jerry McPherson 100 Hino Blvd Marion, AR 72364

**Analytical Testing** 

Information: Project #03152013

Report Date: 03/28/2013

Received: 3/15/2013

Rendell H. Thomas

Report Number: 13-074-0272

REPORT OF ANALYSIS

Randy Thomas Project Manager

Lab No: 96773

Sample ID : C/W Before

Matrix: Aqueous

Sampled: 3/15/2013 11:00

Analytical Method:	EPA-608 (PCB)							
Prep Method:	EPA-608 (PCB Prep)		Prep Batch(es):	L158373	Date/T	ime Prepped:	3/18/20	013 09:15:00
Test	+	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Batch
Aroclor 1016		<0.800	μg/L	0.800	1	03/20/13 01:45	VIC	L158595
Aroclor 1221		<0.800	μg/L	0.800	1	03/20/13 01:45	VIC	L158595
Aroclor 1232		<0.800	μg/L	0.800	1	03/20/13 01:45	VIC	L158595
Arodor 1242		<0.800	μg/L	0.800	1	03/20/13 01:45	VIC	L158595
Arodor 1248		<0.800	μg/L	0.800	1	03/20/13 01:45	VIC	L158595
Aroclor 1254		<0.800	μg/L	0.800	1	03/20/13 01:45	VIC	L158595
Aroclor 1260		<0.800	μg/L	0.800	1	03/20/13 01:45	VIC	L158595
Surrogate: Dec	achlorobiphenyl		3.84 *	Limits: 25-1259	<b>%</b>	1 03/20/13 01:4	5 VIC	L158595
Surrogate: Tet	rachloro-m-xylene		6.21 *	Limits: 25-1259	<b>%</b>	1 03/20/13 01:4	5 VIC	L158595

Qualifiers/ **Definitions** 

Outside QC limit

Recovery out of range

RPD >40% dual column results

DF

Dilution Factor

MQL



Customer Number: 10349

## Environmental Testing & Consulting, Inc. 2790 Whitten Road Memphis, Tennessee 38133 (901) 213-2400 Fax (901) 213-2440

"A Laboratory Management Partner"

#### **Cooler Receipt Form**

Customer Name: Hino Motor Manufacturing U Report Number: 13-074-0272	ISA, Inc.		
	ng Method		
○ Fed Ex ○ UPS ○ US Postal Client	t Cab	Courier	Other:
Shipping container/cooler uncompromised?	Yes	○ No	
Custody seals intact on shipping container/cooler?	O Yes	○ No	Not Required
Custody seals intact on sample bottles?	O Yes	○ No	Not Required
Chain of Custody (COC) present?	Yes	○ No	
COC agrees with sample label(s)?	Yes	○ No	·
COC properly completed	Yes	○ No	
Samples in proper containers?	Yes	○ No	
Sample containers intact?	Yes	○ No	
Sufficient sample volume for indicated test(s)?	Yes	○ No	
All samples received within holding time?	Yes	○ No	
Cooler temperature in compliance?	Yes	○ No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	Yes	○ No	
Water - Sample containers properly preserved	Yes	○ No	○ N/A
Water - VOA vials free of headspace	Yes	○ No	○ N/A
Trip Blanks received with VOAs	○ Yes	○ No	● N/A
Soil VOA method 5035 – compliance criteria met	○ Yes	○ No	● N/A
High concentration container (48 hr)	Low co	ncentration EnC	ore samplers (48 hr)
High concentration pre-weighed (methanol -14 of	d) Low co	nc pre-weighed	vials (Sod Bis -14 d)
Special precautions or instructions included?	○ Yes	● No	
Comments:			

Any regulatory non-compliance issues will be recorded on non-compliance report.

Signature: Rebekah Ross

Date & Time: 03/15/2013 14:09:07



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Lagra



Hino Motor Manufacturing USA, Inc Analytical Testing

13-074-0272 10349 2013-03-15 13:48:37

Company Name Uine Motor Manufacturin	g USA, Inc.				Custome 0349	er Numb	er	Telephor (870) 635-1		RUSH	ICE
Site Name Project Co Wastewater- Kit 2 of 2			Comment at and Washen Worl					FID N		ımber	
Project 4w Belne	cabinat /liv	P-9/5	Project N			PO Nur	nber			<u></u>	
Project Manager / Co Mr. Jerry McPherson	ontact			E	-mail	@hmmusa	Leom		-	SECURE S	
Sample ID	Container Type		ted Date / 'ime	# Cont	Prese	rvative	Grab / Comp	Matrix	A	nalyses	
efw Before	Glass Vial Amber - 40ml	3-19	60C	3		drochloric cid		Aqueous	624	- TTO- VO	c
Yw Rfor	Glass Amber - Liter	3-15	- <b>200</b>	,2	HORITA SICHORIA	3 - Sodium sulfate		Aqueous		TTO- SVO esticides	C, PCB,
Yw Berne	Plastic - Pint	11:	. 2013 00	1	1.00	Sodium		Aqueous		CNT	
Va Betra	Plastic - Pint	3-15		1	HN03-1	Nitric Acid		Aqueous	Cd, Cr, C	u, Pb, NI, A	ig, Zn

Sampled By	Method of Shipment	Blank / Cooler Remarks Temperature				
Relinquished By (sign)	Date/Time Myrech 5,2015 13:03	Received By (sign)	Date / Time			
Relinquished By (sign)	Date / Time	Received By (sign)	Date / Time			
Relinquished By (sign)	Date / Time	Received by Lab (sign)	Date / Time			



Memphis, Tennessee 38133

\*A Laboratory Manag

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6/19/2013

Hino Motor Manufacturing USA, Inc. Mr. Jimmy Brown (Bo) 100 Hino Blvd Marion, AR, 72364

Ref:

**Analytical Testing** 

ETC Report Number: 13-165-0250

Client Project Description: Analytical Testing

Dear Mr. Jimmy Brown (Bo):

Environmental Testing and Consulting, Inc. received sample(s) on 6/14/2013 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method.

The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an asreceived basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,

Rendell H. Thomas

Randy Thomas Project Manager

Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.



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"A Laboratory Management Partner"

10349

Hino Motor Manufacturing USA, Inc. Mr. Jimmy Brown (Bo) 100 Hino Blvd

Project

**Analytical Testing** 

Information:

Report Date: 06/19/2013

Received: 6/14/2013

Rendell H. Thomas

Report Number: 13-165-0250

REPORT OF ANALYSIS

Randy Thomas Project Manager

Lab No : 93207

Marion, AR 72364

Matrix: Aqueous

Sample ID : Water

Sampled: 6/14/2013 0:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
Total Cadmium	<0.002	mg/L	0.002	1	06/18/13 16:40	BKN	EPA-200.7
Total Chromium	<0.005	mg/L	0.005	1	06/18/13 16:40	BKN	EPA-200.7
Total Copper	0.008	mg/L	0.005	1	06/18/13 16:40	BKN	EPA-200.7
Total Lead	<0.006	mg/L	0.006	1	06/18/13 16:40	BKN	EPA-200.7
Total Nickel	0.364	mg/L	0.005	1	06/18/13 16:40	BKN	EPA-200.7
Total Silver	<0.005	mg/L	0.005	1	06/18/13 16:40	BKN	EPA-200.7
Total Zinc	0.013	mg/L	0.010	1	06/18/13 16:40	BKN	EPA-200.7



# Environmental Testing & Consulting, Inc. 2790 Whitten Road Memphis, Tennessee 38133 (901) 213-2400 Fax (901) 213-2440 "A Laboratory Management Partner"

Coole	r Recei	pt Form
-------	---------	---------

Shippi	ing Method		
Fed Ex UPS US Postal Clier	nt C Lab	Ourier Courier	Other:
Shipping container/cooler uncompromised?	Yes	○ No	
Custody seals intact on shipping container/cooler	? Yes	○ No	Not Required
Custody seals intact on sample bottles?	O Yes	○ No	Not Required
Chain of Custody (COC) present?	Yes	○ No	ų.
COC agrees with sample label(s)?	Yes	○ No	
COC properly completed	Yes	○ No	
Samples in proper containers?	Yes	○ No	
Sample containers intact?	Yes	○ No	
Sufficient sample volume for indicated test(s)?	Yes	○ No	
All samples received within holding time?	Yes	○ No	
Cooler temperature in compliance?	Yes	○ No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	Yes	● No	
Water - Sample containers properly preserved	Yes	○ No	○ N/A
Water - VOA vials free of headspace	O Yes	○ No	● N/A
Trip Blanks received with VOAs	○ Yes	○ No	● N/A
Soil VOA method 5035 – compliance criteria met	O Yes	○ No	● N/A
High concentration container (48 hr)	Low c	oncentration EnC	ore samplers (48 hr)
High concentration pre-weighed (methanol -14	d) Low c	onc pre-weighed	vials (Sod Bis -14 d)
Special precautions or instructions included?	( ) Yes	● No	

Page 3 of 4

Signature: Rebekah Ross

Date & Time: 06/14/2013 11:30:29



2790 Whitten Road

Memphis, Tennessee 38133 (901) 213-2400 Fax (901) 213-2440



Hino Motor Manufacturing USA, Inc. Analytical Testino

13-165-0250 10349 06-14-2013 11:30:12

Company Name Hino Motor Manufacturing USA, Inc.			Customer Number		Telephon (870) 635-0-		ICE	
Site Name		Project C	Project Comment					
Project		Project N	lumbe			00		- Miles S. 1000
Project Manager / ( Mr. Jimmy Brown (Bo)	Contact			-mail orown@hminusa.com		00		<u> </u>
Sample ID	Container Type	Collected Date / Time	# Cont	Preservative	Grab / Comp	Matrix	Analyses	
w	Plastic - Pint		1	HNO3 - Nitric Acid		Aqueous	Cr, Cu, Pb, Ni, Ag,	Zn, Cd

Sampled By LMLL	Method of Shipment	Blank / Cooler Temperature	
Refinquished By (sign)	Date / Time 6-14-13 @ 7:30	Received By (sign)	Date / Time 6-13-2013 7:30
Reflinquished By (sign)	Date / Time	Received By (sign)	Date / Time
Relinquished By (sign)	Date / Time 6/4/3/10	Received by Lab (sign)	Date / Time