

## Gilliam, Allen

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**From:** Gilliam, Allen  
**Sent:** Tuesday, March 27, 2012 2:52 PM  
**To:** jmcpherson@hmmusa.com  
**Cc:** marion jim shempert; Henderson, Katie  
**Subject:** AR0021971\_Hino Motors ARP001025 March 2012 Incomplete Baseline Monitoring Report reply\_20120327 AFIN 1800565

Jerry,

Hino Motor's (HM) Baseline Monitoring Report (BMR) required per 40 CFR 403.12(b) was received on 3/22/12, reviewed and deemed incomplete.

To reiterate: Per 40 CFR 403.12(b), "Reporting requirements for industrial users upon effective date of categorical pretreatment standard—baseline report...At least 90 days prior to commencement of discharge, New Sources, and sources that become Industrial Users subsequent to the promulgation of an applicable categorical Standard, shall be required to submit to the Control Authority a report which contains the information listed in paragraphs (b)(1)–(5) of this section..."

Please resubmit within thirty (30) days from the date on this correspondence a complete BMR per the below comments:

- 1) 40 CFR 403.12(b)(3) "Description of operations. [HM] shall submit a brief [but comprehensive] description of the nature, average rate of production, and Standard Industrial Classification [and NAICS code(s)] of the operation(s) carried out by [HM]. This description should include a schematic process diagram which indicates points of Discharge to the POTW [City] from the regulated processes."
  - a. The process description submitted describes more details regarding air emissions than wastewater (w.w.) generating operations. Please modify your "Summary of Activity" sheets to better focus on the processes that generate regulated w.w. and where it flows to match-up with the (old/current? dated 10/26/05) schematics depicting your Electro Deposition (ED) Coating line w.w. and treatment (pretreatment).
  - b. The description of the processes involving the truck frame parts includes "shot blasting followed by chemical pretreatment processes [then] powder coating". Is there any phosphatizing or acids in the "chemical pretreatment processes"? This process should also be included on a schematic similar to your ED Coating line if there's any wastewater generated/discharged from it. If there is any phosphoric (or any) acid used in the "chemical pretreatment process", that process is also considered a core operation under 40 CFR 433.10. Please submit this schematic including the first page of its chemicals' MSDS sheets.
  - c. Your schematic, "II Processing flow chart" is a succinct, but comprehensive simplification of your pretreatment system and would be adequate if it illustrated in more detail the configuration and location of the discharge/sampling point instead of just a line with an arrow pointing out from the "Discharge tank". Please submit a more detailed schematic/narrative location of this discharge/sampling point (is it just a valve on the discharge line?).
  - d. The simplified process schematic of your ED Paint line [entitled, "1) PT&ED paint candidate material (Hino's idea) and 2) PT&ED Process Outline"] does not indicate where any of these process/rinse tanks' wastewater is discharged/overflowed to. Please submit revised schematic.
  - e. Please understand this BMR requires you to describe w.w. flows/volumes from your regulated processes through pretreatment (what you call "processing") to your final discharge/monitoring (sampling) point, not air emissions.
- 2) From your draft submittal the Zn phosphatizing process is federally regulated under the "core" operation (coating) per 40 CFR 433.10 (see

<http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=6ff37382eefb9c8d3442ba20cd73cdcb&rgn=div8&view=text&node=40:30.0.1.1.9.1.4.1&idno=40>

- ) This “coating” process should be placed on the bottom of page 2 of your BMR.
- a. Attempting to follow your entire process(es) description, are there any other “ancillary” (see 40 CFR 433.10 above) wastestreams discharged to the City from: grinding machine water w/soluble cutting/additive, heat treating quench, differential case and parts aqueous washing machines [any phosphatizing here? Or, just an alkaline {soap} wash?], assembled rear axle spray coating booths, degreasing, No. 1 water rinse, surface conditioner, No. 2 water rinse, DI water rinse, ED Coating, UF rinse or the DI water rinse, chemical “pretreatment process” [any phosphatizing here? If so, see 1) b. above] after shot blasting (then to powder coating)? These should be delineated and placed at the top of page 3 of the BMR as “ancillary” (also regulated under 40 CFR 433) wastestreams.
  - b. The BMR sections (5) A. and C under Measurement of Pollutants in User’s Discharge to POTW (publicly owned treatment works or the City) are blank. Please complete these sections and re-submit.
  - c. The BMR section (6) “Certifications”, top of page 6 shows you’ve entered “Yes” when asked if Hino is meeting applicable categorical pretreatment standards on a consistent basis. I’m assuming this is an error after reviewing your last (only) sample results.
  - d. The BMR sections (6) and (7) certification, signatory and qualified professional signatures/dates are blank. Please correct c. above and re-submit the BMR with the signed/dated pages.
  - e. The BMR’s last page for the “TTO Certification Statement” cannot be signed until a toxic organic management plan (TOMP) is submitted and approved by ADEQ. Otherwise, the parameters Hino must sample for and be in compliance with are listed in 40 CFR 433.17 @ <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=ce635eeb1b0a893303dfb47f10b2823f&rgn=div8&view=text&node=40:30.0.1.1.9.1.4.8&idno=40> and the Toxic Organics located in 40 CFR 433.11 @ <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=ce635eeb1b0a893303dfb47f10b2823f&rgn=div8&view=text&node=40:30.0.1.1.9.1.4.2&idno=40>
  - f. Old EPA guidance for an approvable TOMP can be found @ <http://www.epa.gov/npdes/pubs/owm0021.pdf>

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

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Jim Shempert, Marion Wastewater, Utility Manager