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SEMI-ANNUAL PRETREATMENT REPORT

FOR

DEC 3 2007

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BOSCH

ROBERT BOSCH TOOL CORPORATION Heber Springs, Arkansas Facility

November 2007

NPDES PERMIT FILE

NPDES # ARPO00019

AFIN # 12-0052

Permit PN

Correspondence (Pret)

Technical Backup

3/25/08 Date Scanned

Prepared by:



Engineering, Compliance & Construction, Inc.

415 North McKinley, Suite 1180

Little Rock, Arkansas 72205

Telephone (501) 663-8247 • Facsimile (501) 664-5005

talked to ECCI today
(penney Derry berry) & they
indicated facility was
currently in the process of
completely shutting down
their entire ops.

3/25/08 *AF*

AFIN # 120052


Semi-Annual Pretreatment Report
For Industrial Users Regulated by 40 CFR 433

Prepared for:

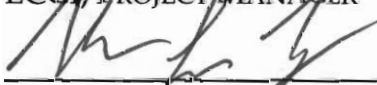
BOSCH

**ROBERT BOSCH TOOL CORPORATION
HEBER SPRINGS, ARKANSAS**

PREPARED BY:


PENNIE L. DERRYBERRY, REM, REPA
ECCI, PROJECT MANAGER

REVIEWED BY:


SHANNON LYNN, P.E.
ECCI, SENIOR ENGINEER

APPROVED BY:


TIM WAGGONER, PLANT MANAGER
ROBERT BOSCH TOOL CORPORATION

PREPARED BY:



Engineering, Compliance & Construction, Inc.
415 North McKinley, Suite 1180
Little Rock, Arkansas 72205
Telephone (501) 663-8247 • Facsimile (501) 664-5005

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 433

Use of this form is not an EPA/ADEQ requirement

ATTN: Water/Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION	
A. LEGAL NAME & MAILING ADDRESS Robert Bosch Tool Corporation 250 Bolton Sullivan Drive Heber Springs, AR 72543	B. FACILITY & LOCATION ADDRESS Robert Bosch Tool Corporation 250 Bolton Sullivan Drive Heber Springs, AR 72543
C. Facility Contact: Rocky Togni	D. Telephone Number: (501) 210-6662
(2) REPORTING YEAR -- FISCAL YEAR From May 1 to April 30 (Both Semi-Annual Reports to Cover Fiscal Year)	
A. MONTHS IN WHICH REPORTS ARE DUE <u>November and May</u>	B. PERIOD COVERED BY THIS REPORT FROM: <u>May 1, 2007 to October 31, 2007</u>
(3) DESCRIPTION OF OPERATIONS	
A. REGULATED PROCESSES <u>CORE PROCESS(ES)</u> CHECK EACH APPLICABLE BLOCK <input type="checkbox"/> Electroplating <input type="checkbox"/> Electroless Plating <input type="checkbox"/> Anodizing <input checked="" type="checkbox"/> Coating <input type="checkbox"/> Chemical Etching and Milling <input type="checkbox"/> Printed Circuit Board Manufacture ANCILLARY PROCESSES(ES)* LIST BELOW EACH PROCESS USED IN THE FACILITY <u>Cleaning, Machining, Paint stripping</u> <u>Powder painting, Assembly, and</u> <u>Testing</u> _____ _____ _____	B. CHANGES: <small>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.</small> No changes in the regulated processes have occurred since the previous SAR was submitted. However, it should be noted that the lower than normal flow rates reported for the sanitary discharge are due to a large reduction in the work force that has taken place in preparation for the plant closure early next year. In addition, the facility is only operating one ten-hour shift each day.
<small>SEE 40 CFR 433.10(A) FOR 40 DIFFERENT OPERATIONS</small>	
C. Number of Regular Employees at this Facility:	130 D. {Reserved}

(4) FLOW MEASUREMENT (CONT'D)
INDIVIDUAL AND TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY (GPD)

	Process	Average	Maximum	Type of Discharge
	Regulated (core and Anc)	3,900	3,900	continuous
	Regulated (Cyanide)	NA	NA	NA
	§403.6 (e) Unregulated*	NA	NA	NA
	Cooling Water	364.5	400	batch
	Sanitary	2,339	4,277	continuous
	Total Flow to POTW	6,604	8,577	

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

(5) MEASUREMENT OF POLLUTANTS

<p>A. TYPE OF TREATMENT SYSTEM CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Neutralization</p> <p><input type="checkbox"/> Chemical Precipitation and Sedimentation</p> <p><input type="checkbox"/> Chromium Reduction</p> <p><input type="checkbox"/> Cyanide Destruction</p> <p><input type="checkbox"/> Other</p> <p><input checked="" type="checkbox"/> None</p>	<p>B. COMMENTS ON TREATMENT SYSTEM</p> <p>None</p>
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C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES--CORE AND ANCILLIARY (AFTER TREATMENT, IF APPLICABLE). ATTACH THE MOST RECENT LAB ANALYSIS; 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.

Pollutant (mg/l)	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN*	TTO*
Max for 1 day	0.69	2.77	3.38	0.69	3.98	0.43	2.61	1.2	2.13
Monthly Avg.	0.26	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	<0.004	<0.007	0.034	0.044	0.014	<0.007	0.46	<0.01	N/A
Avg. Measured	<0.004	<0.007	0.032	0.043	0.014	<0.007	0.41	<0.01	N/A

Sample Location: final discharge pipe from the metal finishing operations
 Sample Type (Grab or Composite) composite (metals) & grabs (cyanide)
 Number of Samples and Frequency Collected: one/six months
 40 CFR 136 Preservation and Analytical Methods Used: Yes No

(6) CERTIFICATION

A. CYANIDE CERTIFICATION (Applicability Pending)

[Reserved]

B. CHECK ONE: §433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED §433.12(a) TTO CERTIFICATION PROVIDED BELOW

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 had 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 the Arkansas Department of Environmental Quality.

Tim Waggoner, Plant Manager

(Typed Name)

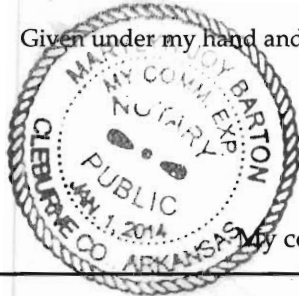
Tim Waggoner by Robert L. Egan
(Corporate Officer or authorized representative)

11/28/07
Date of Signature

STATE OF ARKANSAS)
COUNTY OF _____)

Before me, the undersigned authority, on this day personally appeared _____ of _____ 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 28th day of November, 2007.



Marilyn Joy Barton
NOTARY Public in and for
County, Arkansas

My commission expires 1-1-2014

(7) POLLUTION PREVENTION ACT OF 1990 [42 u.s.c. 131010 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:
Robert Bosch Tool Corporation has an ongoing commitment to pollution prevention. The facility is ISO 14001 certified which requires that they commit to responsible environmental management.

(8) GENERAL COMMENTS: None

(9) SIGNATORY REQUIREMENTS [40 CFR 403.12(1)]

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 individuals 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.

Tim Waggoner
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Tim Waggoner
SIGNATURE *by Robert L. Jorgin*

Plant Manager
OFFICIAL TITLE

11/28/07
DATE SIGNED

Appendix A
Analytical Data

Robert Bosch Tool Corporation
250 Bolton Sullivan Drive
Heber Springs, AR 72543

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 1°C

Receipt Verification:	Complete Chain of Custody	Y
	Sample ID on Sample Labels	Y
	Date and Time on Sample Labels	Y
	Proper Sample Containers	Y
	Within Holding Times	Y
	Adequate Sample Volume	Y
	Sample Integrity	Y
	Proper Temperature	Y
	Proper Preservative	Y

COMMENTS

There were no qualifiers for this data and all samples met quality control criteria.

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).

"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.

"Standard Methods for the Examination of Water and Wastewaters", 20th edition, 1998.

"American Society for Testing and Materials" (ASTM).

"Association of Analytical Chemists" (AOAC).

"Self-Davis and Moore" (2000).

Robert Bosch Tool Corporation
250 Bolton Sullivan Drive
Heber Springs, AR 72543

ANALYTICAL RESULTS

AIC No. 114220-1
Sample Identification: #1 10/30/07 0930

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W22884	

AIC No. 114220-2
Sample Identification: #2 10/30/07 10:30

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W22884	

AIC No. 114220-3
Sample Identification: #3 10/30/07 1:15

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W22884	

AIC No. 114220-4
Sample Identification: #4 10/30/07 2:15

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W22884	

AIC No. 114220-5
Sample Identification: Dup 10/30/07 2:15

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W22929	

AIC No. 114220-6
Sample Identification: RBTC 10/30/07 0930 - 1430

Analyte	Method	Result	RL	Units	Batch	Qualifier
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S21621	
Chromium	EPA 200.7	< 0.007	0.007	mg/l	S21621	
Copper	EPA 200.7	0.034	0.006	mg/l	S21621	
Lead	EPA 200.7	0.044	0.04	mg/l	S21621	
Nickel	EPA 200.7	0.014	0.01	mg/l	S21621	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S21621	
Zinc	EPA 200.7	0.35	0.002	mg/l	S21621	

AIC No. 114220-7
Sample Identification: RBTC Dup 10/30/07 0930 - 1430

Analyte	Method	Result	RL	Units	Batch	Qualifier
Copper	EPA 200.7	0.030	0.006	mg/l	S21621	
Lead	EPA 200.7	0.043	0.04	mg/l	S21621	
Zinc	EPA 200.7	0.46	0.002	mg/l	S21621	



Robert Bosch Tool Corporation
250 Bolton Sullivan Drive
Heber Springs, AR 72543

SAMPLE PREPARATION REPORT

AIC No.	Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
114220-1	Total Cyanide	-	31OCT07 1404 258		W22884	
114220-2	Total Cyanide	-	31OCT07 1404 258		W22884	
114220-3	Total Cyanide	-	31OCT07 1404 258		W22884	
114220-4	Total Cyanide	-	31OCT07 1404 258		W22884	
114220-5	Total Cyanide	-	05NOV07 1437 258		W22929	
114220-6	Metals	01NOV07 1531 263	01NOV07 2042 235		S21621	
114220-7	Metals	01NOV07 1531 263	01NOV07 2046 235		S21621	

Robert Bosch Tool Corporation
 250 Bolton Sullivan Drive
 Heber Springs, AR 72543

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.2 mg/l	89.5/90.5	85-115	1.11	20	W22884	
Cyanide	0.2 mg/l	91.5/92.0	85-115	0.545	20	W22929	
Cadmium	5 mg/l	95.6	85-115	-	20	S21621	
Chromium	0.5 mg/l	95.6	85-115	-	20	S21621	
Copper	0.5 mg/l	93.0	85-115	-	20	S21621	
Lead	5 mg/l	93.3	85-115	-	20	S21621	
Nickel	0.5 mg/l	93.4	85-115	-	20	S21621	
Silver	0.1 mg/l	98.1	85-115	-	20	S21621	
Zinc	0.5 mg/l	91.5	85-115	-	20	S21621	

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.2 mg/l	91.0/90.0	75-125	1.10	20	W22884	
Cyanide	0.2 mg/l	104/108	75-125	3.29	20	W22929	
Cadmium	5 mg/l	94.1/95.2	75-125	1.23	20	S21621	
Chromium	0.5 mg/l	92.6/95.0	75-125	2.55	20	S21621	
Copper	0.5 mg/l	94.6/95.8	75-125	1.29	20	S21621	
Lead	5 mg/l	96.8/98.3	75-125	1.53	20	S21621	
Nickel	0.5 mg/l	86.1/87.7	75-125	1.87	20	S21621	
Silver	0.1 mg/l	98.1/97.7	75-125	0.480	20	S21621	
Zinc	0.5 mg/l	90.0/89.7	75-125	0.399	20	S21621	

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	QC Sample	Qualifier
Cyanide	SM4500-CN C,E	< 0.01	mg/l	0.01	W22884-1	
Cyanide	SM4500-CN C,E	< 0.01	mg/l	0.01	W22929-1	
Cadmium	EPA 200.7	< 0.004	mg/l	0.004	S21621-1	
Chromium	EPA 200.7	< 0.007	mg/l	0.007	S21621-1	
Copper	EPA 200.7	< 0.006	mg/l	0.006	S21621-1	
Lead	EPA 200.7	< 0.04	mg/l	0.04	S21621-1	
Nickel	EPA 200.7	< 0.01	mg/l	0.01	S21621-1	
Silver	EPA 200.7	< 0.007	mg/l	0.007	S21621-1	
Zinc	EPA 200.7	< 0.002	mg/l	0.002	S21621-1	



Robert Bosch Tool Corporation
 250 Bolton Sullivan Drive
 Heber Springs, AR 72543

QUALITY CONTROL PREPARATION REPORT

LABORATORY CONTROL SAMPLES

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Cyanide	-	31OCT07 1038 258		W22884-2	
Cyanide	-	31OCT07 1038 258		W22884-3	
Cyanide	-	05NOV07 1437 258		W22929-2	
Cyanide	-	05NOV07 1437 258		W22929-3	
Metals	01NOV07 1532 263	01NOV07 1914 270		S21621-2	

MATRIX SPIKE SAMPLES

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Cyanide	-	31OCT07 1038 258		W22884-4	
Cyanide	-	31OCT07 1038 258		W22884-5	
Cyanide	-	05NOV07 1437 258		W22929-4	
Cyanide	-	05NOV07 1437 258		W22929-5	
Metals	01NOV07 1532 263	01NOV07 1917 270		S21621-3	
Metals	01NOV07 1532 263	01NOV07 1921 270		S21621-4	

LABORATORY BLANKS

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Cyanide	-	31OCT07 1038 258		W22884-1	
Cyanide	-	05NOV07 1437 258		W22929-1	
Metals	01NOV07 1532 263	01NOV07 1910 270		S21621-1	

114226

ECCI

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: Robert Bosch Tool Corporation		PO No.		ANALYSES REQUESTED									
Project Reference: November 2007 SAR		SAMPLE MATRIX		NO OF BOTTLES		T. Cyanide		Cd, Cr, Cu, Pb, Ni, Ag, Zn		C4 Pb Zn		Received on ice? (4C)?	
Project Manager: P. Bray		WATER		1		X						YES <u>16</u> NO	
Sampled By: PLB		SOIL		1		X						Remarks	
AIC NO	Sample Identification	date/time collected	G R A B	C O M P									
1	#1	10/30/07 0930	X										
2	#2	10/30/07 1030	X										
3	#3	10/30/07 13:15	X										
4	#4	10/30/07 14:15	X										
5	Dup	10/30/07 14:15	X										
6	Metals	10/30/07 0930 to 1430	X	X					X				
7	Metals Dup	10/30/07 0930 to 1430	X	X									
Container Type		Preservative		P		P		N		N		Field pH calibration on ___ @ ___ Buffer: ___	
Symbol references: G = Glass P = Plastic V = VOA vials NO = None S = Sulfuric acid pH2 T = Sodium Thiosulfate N = Nitric acid pH2 B = NaOH to pH12 Z = Zinc acetate													
Turnaround Time Requested: (Please Circle) NORMAL or EXPEDITED IN ___ DAYS		Relinquished By: <i>[Signature]</i> 10/30/07		Received By: <i>[Signature]</i> 10/31/07		Date/Time		Date/Time		Date/Time		Date/Time	
Expedited results requested by: _____		Relinquished By: _____		Received in Lab By: <i>[Signature]</i>		Date/Time		Date/Time		Date/Time		Date/Time	
ECCI contact: <u>P. Derryberry</u> Phone: <u>(501) 663-8247</u> Fax: <u>664-5005</u>		Comments: _____		Report Attention to: <u>Jim Bolhuis</u> Report Address to: <u>250 Bolton Sullivan Drive, Heber Springs, AR</u>									



Engineering, Compliance & Construction, Inc.

415 North McKinley Street, Suite 1180 • Little Rock, Arkansas 72205 • Phone 501.663.8247 • Fax 501.664.5005 • www.ecci.com

November 27, 2007

Rocky Togni
Robert Bosch Tool Corporation
250 Bolton Sullivan Drive
Heber Springs, AR 72543

Dear Rocky,

Enclosed you will find two (2) copies of the Semi-Annual Pretreatment Report prepared for the Robert Bosch Tool Corporation, Heber Springs, Arkansas facility for the reporting period of May 1, 2007 to October 31, 2007. Please have Mr. Waggoner sign the copies in the places indicated with the flags. There is also one location that requires the signature of a Notary Public. One copy of the report should be forwarded by certified mail to the ADEQ at the following address by November 30, 2007.

Arkansas Department of Environmental Quality
NPDES, Pretreatment Section
5301 Northshore Drive
North Little Rock, AR 72118-5317
ATTN: Mr. Rufus Torrence

The other copy is to be maintained within your facility storm water records.

Thank you for this opportunity to provide environmental services to the Robert Bosch Tool Corporation in Heber Springs, AR. Please let me know if I can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Penny L. Derr', is written over the typed name.

Penny L. Derr, REM, REPA
Senior Environmental Scientist