

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

<u>REF #</u>	<u>PRODUCT NAME</u>	<u>DEPT.</u>	<u>REGULATED CONSTITUENT</u>	<u>%</u>	<u>DISPOSAL METHOD</u>	<u>USAGE AMOUNT</u>
353	Mineral Spirits	Spot/FBC	Naphtha	100	Evaporation during part cleaning	1 gal/yr
355	DP90LF (Paint)	Spot/FBC	Toluene Naphtha 1,2,4 Trimeyethylbenzene	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/hailed 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

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964	PVC Cement	Maint.	Acetone	5 to 20	Consumed w/PVC repairs	1 gal/yr
970	RustControlSpr.Paint	Maint.	Methylene Chloride Xylene	10 5	Consumed on equip. repairs	12 cans/yr
980	Paint/Finish Remover	Maint.	Toluene Methylene 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.	Methylene (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

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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