

Gage, Hannah

From: Johnson, Lindsay
Sent: Tuesday, February 14, 2017 9:52 AM
To: 'james.house@kohler.com'
Cc: Yates, Adam; Leamons, Bryan; McWilliams, Carrie; Gage, Hannah
Subject: AR0034347_KOHLERs ARP000021 Jan 2017 incomplete semi annual Pretreatment report_20170214
Attachments: Kohler _Sheridan January 2016.pdf

Good Morning,

KOHLER's January 2017 semi-annual Pretreatment report was received, reviewed, and deemed incomplete. 40 CFR 403.12 requires the Industrial User to submit results of sampling and analysis of regulated pollutants in the discharge. In order for the report to be deemed complete and compliant, a copy of the laboratory sample results and Chain of Custody must be submitted to the Department within 30 days of this email.

Thank you for your attention in this matter.

*Lindsay Johnson
NPDES Staff Engineer
ADEQ-Office of Water Quality
(501)682-0045*

B1111 F

KOHLER.

Mr. Allen Gilliam
NPDES Pretreatment Engineer
Arkansas Department of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118

Re: **SEMI-ANNUAL REPORT 2nd HALF 2016**

AG

1/13/17

AR00343417

Dear Mr. Gilliam,

In accordance with 40CFR403.12 (e) we are submitting semi-annual reports for the months July 1, 2016 through December 31, 2016. Attached with this report is the TTO analysis for this period. Please contact me at 870-917-6215 should you have any questions.

Sincerely,



James House
Safety/Environmental Specialist

Attachments: TTO Analysis for the 2nd half of 2016

Cc: Jim Bilgo, EHS Supervisor, Kohler, WI
Erika Strand, Global Faucets Program Coordinator
David Fitzgerald, Sheridan Waterworks
File

RECEIVED
JAN 17 2017

@my desk 1/19 -110

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Anc)	67,593	150,000	POTW Continuous
Regulated (Cyanide)	0	0	N/A
§403.6(e) Unregulated*	0	0	N/A
§403.6(e) Dilute	0	0	N/A
Cooling Water	0	0	N/A
Sanitary	26,574	58,973	POTW Continuous
Total Flow to POTW	94,167	208,973	*****

*"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 OF TREATMENT SYSTEM

Treated water samples are sent weekly to commercial lab for analysis. In-house testing performed twice per shift. Results of in-house tests are hand delivered to city each Monday. Monthly DMR is also submitted.

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.

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	MDL	2.13
Monthly Ave	0.26	1.71	2.07	0.43	2.38	0.24	1.48	MDL	--
Max Measured	0.008	1.56	0.52	0.015	1.44	0.02	0.19	0.02	0.00
Ave Measured	0.008	0.32	0.29	0.015	0.56	0.02	0.08	0.02	0.00

*PROVIDE THE CONCENTRATION HERE IF NO CERTIFICATION IS PROVIDED IN SECTION 6 BELOW OR MARK N/A IF A CERTIFICATION IS PROVIDED.

Sample Location #001 AFTER TREATMENT/BEFORE DISCHARGE

Sample Type (Grab or Composite) COMPOSITE

Number of Samples and Frequency Collected 1/WEEK - (IN-HOUSE 2/SHIFT)

40CFR136 Preservation and Analytical Methods Use: Yes No

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

§602 [42 U.S.C. 1310] 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:

(8) GENERAL COMMENTS

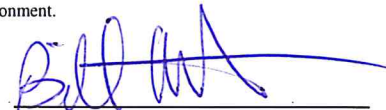
ATTACHMENTS:
TTO/CN Analysis
Semi-Annual Metals Analysis

cc: Erika Strand-Corporate EHS Program Coordinator
David Fitzgerald - Sheridan Waterworks
File

(9) SIGNATORY REQUIREMENTS [40CFR403.12(1)]

I certify under penalty of law that I have personally examined and am familiar with the information in this semi-annual compliance report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Bill Armstong
NAME OF CORPORATE OFFICIER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

Plant Manager of Arkansas Faucet Operations
OFFICIAL TITLE

1/13/17
DATE SIGNED

DATE	GALLONS	DATE	GALLONS	DATE	GALLONS	DATE	GALLONS
7/1/16	shut down	8/1/16	102100	9/1/16	135700	10/1/16	Saturday
7/2/16	Saturday	8/2/16	103400	9/2/16	Down	10/2/16	Sunday
7/3/16	Sunday	8/3/16	113700	9/3/16	Saturday	10/3/16	103700
7/4/16	Holiday	8/4/16	103000	9/4/16	Sunday	10/4/16	142600
7/5/16	98200	8/5/16	74000	9/5/16	Holiday	10/5/16	134900
7/6/16	100400	8/6/16	Saturday	9/6/16	127800	10/6/16	111200
7/7/16	108100	8/7/16	Sunday	9/7/16	12800	10/7/16	16900
7/8/16	97300	8/8/16	76400	9/8/16	133100	10/8/16	Saturday
7/9/16	Saturday	8/9/16	106200	9/9/16	105100	10/9/16	Sunday
7/10/16	Sunday	8/10/16	92700	9/10/16	Saturday	10/10/16	109300
7/11/16	110800	8/11/16	102500	9/11/16	Sunday	10/11/16	106200
7/12/16	82900	8/12/16	82900	9/12/16	108100	10/12/16	118600
7/13/16	93000	8/13/16	33000	9/13/16	112400	10/13/16	94200
7/14/16	112300	8/14/16	Sunday	9/14/16	127300	10/14/16	10000
7/15/16	85500	8/15/16	87400	9/15/16	93200	10/15/16	Saturday
7/16/16	Saturday	8/16/16	95100	9/16/16	40000	10/16/16	Sunday
7/17/16	Sunday	8/17/16	121200	9/17/16	Saturday	10/17/16	101000
7/18/16	84000	8/18/16	102500	9/18/16	Sunday	10/18/16	90700
7/19/16	102000	8/19/16	78600	9/19/16	87300	10/19/16	133300
7/20/16	119900	8/20/16	16500	9/20/16	64800	10/20/16	128000
7/21/16	72400	8/21/16	Sunday	9/21/16	103700	10/21/16	28000
7/22/16	29600	8/22/16	94200	9/22/16	72400	10/22/16	20700
7/23/16	Saturday	8/23/16	126000	9/23/16	36000	10/23/16	Sunday
7/24/16	Sunday	8/24/16	133500	9/24/16	39000	10/24/16	137000
7/25/16	107000	8/25/16	121500	9/25/16	Sunday	10/25/16	12800
7/26/16	104300	8/26/16	94100	9/26/16	103200	10/26/16	129500
7/27/16	120900	8/27/16	33700	9/27/16	113700	10/27/16	139000
7/28/16	60000	8/28/16	39700	9/28/16	123900	10/28/16	91000
7/29/16	87800	8/29/16	123600	9/29/16	117200	10/29/16	Saturday
7/30/16	6000	8/30/16	125700	9/30/16	75100	10/30/16	Sunday

DATE	GALLONS	DATE	GALLONS
11/1/15	119700	12/1/16	95600
11/2/15	126300	12/2/16	76300
11/3/15	125900	12/3/16	73400
11/4/15	107300	12/4/16	11000
11/5/15	87000	12/5/16	113100
11/6/15	Sunday	12/6/16	116800
11/7/15	85200	12/7/16	123400
11/8/15	100800	12/8/16	122200
11/9/15	92500	12/9/16	86200
11/10/15	95500	12/10/16	33300
11/11/15	40500	12/11/16	Sunday
11/12/15	94000	12/12/16	124800
11/13/15	Sunday	12/13/16	99700
11/14/15	101600	12/14/16	128100
11/15/15	109300	12/15/16	125000
11/16/15	116100	12/16/16	91400
11/17/15	98100	12/17/16	28300
11/18/15	55600	12/18/16	Sunday
11/19/15	Saturday	12/19/16	102500
11/20/15	Sunday	12/20/16	80600
11/21/15	92300	12/21/16	69900
11/22/15	107000	12/22/16	Holiday
11/23/15	48000	12/23/16	Holiday
11/24/15	Holiday	12/24/16	Holiday
11/25/15	Holiday	12/25/16	Holiday
11/26/15	Saturday	12/26/16	Holiday
11/27/15	Sunday	12/27/16	74600
11/28/15	101800	12/28/16	90700
11/29/15	87100	12/29/16	74000
11/30/15	117500	12/30/16	76900

SEMI-ANNUAL REPORT CALCULATION WORKSHEET (July-December)

Process	Average	Maximum	Type of Discharge
Regulated (Core & Anc)	67593	150000	POTW Continuous
Regulated (Cyanide)	0	0	NA
§403.6(e) Unregulated*	0	0	NA
§403.6(e) Dilute	0	0	NA
Cooling Water	0	0	NA
Sanitary	26574	58973	POTW Continuous
Total Flow to POTW	94,167.39	208,973.15	*****

TOTAL H2O TO PLANT*	NUMBER OF DAYS	AVERAGE GALLONS PER DAY	TOTAL H2O TREATED**	% OF H2O TREATED	MAXIMUM DAY TREATED**	MAXIMUM GALLONS PER DAY
17326800	184	94167	12437100	71.8%	150000	208973

D6

TOTAL H2O TREATED**	NUMBER OF DAYS	AVERAGE REGULATED TOTAL	AVERAGE GALLONS PER DAY	AVERAGE SANITARY	MAXIMUM DAY TREATED**	MAXIMUM GALLONS PER DAY	MAXIMUM SANITARY
12,437,100	184	67593	94167	26574	150000	208973	58973
		67592.93478	C12	D12	F12		

*NUMBERS FROM WATER BILLS

**NUMBERS FROM THE ECOLOGY LOG BOOK

Location Meter #	USAGES					
	To Plater	NE Front	SE Front	Plastics	Toilet Seats	Toilet Seats
4097500	4098000	4099000	4100000	4110000	4111000	
January	306,700	536,900	1,909,000		231,200	32,700
February	391,100	677,400	2,224,000		246,500	33,900
March	346,500	579,200	1,818,000		144,300	31,700
April	398,400	690,800	1,711,000		235,700	33,700
May	347,000	750,900	2,680,000		294,500	51,400
June	293,400	636,500	1,910,000		365,400	37,600
July	561,400	297,300	2,165,000		757,700	60,800
August	362,900	470,200	1,571,000		621,700	45,400
September	488,800	313,300	2,092,000		637,500	39,000
October	564,300	438,800	2,235,000		793,900	47,600
November	530,500	158,600	1,174,000		666,500	65,000
December	574,000	305,700	3,024,000		805,300	52,000
6MO Total	3,081,900	1,983,900	12,261,000	0	4,282,600	309,800

Faucet Plant Total 17326800

	Cd Max	Cd Avg	Cr Max	Cr Avg	Cu Max	Cu Avg	Pb Max	Pb Avg	Ni Max	Ni Avg	Ag Max	Ag Avg	Zn Max	Zn Avg	TTO Max	TTO Avg	Cn Max	Cn Avg
July			1.56	0.6	0.32	0.33			0.5	0.42			0.14	0.09				
August			0.65	0.26	0.21	0.14			0.45	0.28			0.09	0.06				
September			0.32	0.2	0.38	0.23			0.77	0.63			0.15	0.08				
October			0.4	0.26	0.18	0.13			1.14	0.79			0.25	0.21				
November			0.46	0.28	0.37	0.21			0.91	0.57			0.12	0.06				
December	0.008	0.008	0.33	0.32	0.37	0.8	0.015	0.015	1.44	0.86	0.02	0.02	0.12	0.06	0	0	0.02	0.02
Max Measured	0.008		1.56		0.52		0.015		1.44		0.02		0.19		0		0.02	
Avg Measured	0.008		0.32		0.29		0.015		0.558333333		0.02		0.08		0		0.02	