

Loethen, Katie

From: Loethen, Katie
Sent: Monday, June 28, 2021 3:38 PM
To: 'james.house@kohler.com'
Cc: 'sheridan@windstream.net'; McWilliams, Carrie; Sears, Jessica; Jain, Anmol
Subject: AR0034347_Kohler ARP000021 January 2021 semi annual Pretreatment report_20210628

James,

Kohler's 2018, 2019, and 2020 semi-annual Pretreatment reports were received, reviewed, and deemed complete. Kohler is in compliance with the reporting requirements in 40 CFR 403.12(e) as well as the Metal Finishing standards in 40 CFR 433.15. No further action is deemed necessary at this time.

Thank you for the complete reports,

Katie Loethen | Wastewater Engineering Intern
Division of Environmental Quality | **Office of Water Quality**
Permits Branch
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.683.3001 | e: Katie.loethen@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

KOHLER.

July 21, 2019

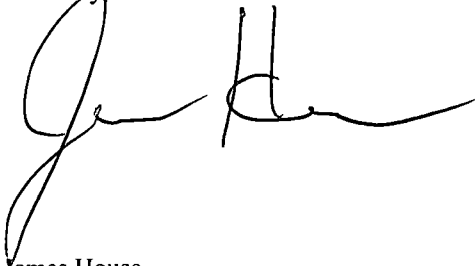
Guy Lester
NPDES Pretreatment Engineer
Arkansas Department of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118

Re: **SEMI-ANNUAL REPORT 1St HALF 2019**

Dear Mr. Lester

In accordance with 40CFR403.12 (e) we are submitting semi-annual reports for the months January 1, 2019 through June 30, 2019. Attached with this report is the TTO/CN analysis for this period.
Please contact me at 870-917-6215 should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'James House', written in a cursive style.

James House
Safety/Environmental Specialist

Attachments: TTO/CN Analysis for the 1st half of 2019

Cc:

Jim Bilgo, Global Faucets Program Coordinator
Dennis Rodgers, Sheridan Waterworks
File

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433

Use of this form is not an EPA/ADEQ requirement.

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION	
A. LEGAL NAME & MAILING ADDRESS KOHLER Company Sheridan, AR 72150	B. FACILITY & LOCATION ADDRESS 415 S. Oklahoma St. Sheridan, AR 72150
C. FACILITY CONTACT: JAMES HOUSE TELEPHONE NUMBER: 870-942-2111	
(2) REPORTING PERIOD-- FISCAL YEAR From January 1 to December 31 (Both Semi-Annual Reports must cover Fiscal Year)	
A. MONTHS WHICH REPORTS ARE DUE JANUARY & JULY	B. PERIOD COVERED BY THIS REPORT FROM: January, 2018 TO: June 30, 2018
(3) DESCRIPTION OF OPERATION	
A. REGULATED PROCESSES <u>CORE PROCESS(ES)</u> CHECK EACH APPLICABLE BLOCK <input checked="" type="checkbox"/> Electroplating <input checked="" type="checkbox"/> Electroless Plating <input type="checkbox"/> Anodizing <input type="checkbox"/> Coating <input type="checkbox"/> Chemical Etching and Milling <input type="checkbox"/> Printed Circuit Board Manufacture <u>ANCILLARY PROCESS(ES)*</u> LIST BELOW EACH PROCESS USED IN THE FACILITY <u>BRAZING</u> <u>ACID/ALKALI CLEANING</u> _____ _____ _____ _____	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.
*SEE 40CFR.10(a) FOR 40 DIFFERENT OPERATIONS	
C. Number of Regular Employees at this Facility <u>258</u>	D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Anc)	69,275	218,800	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	43,003	91,687	POTW Continuous
Total Flow to POTW	101,417	320,320	*****

**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	0.005	0.64	0.26	0.015	0.35	0.02	0.04	0.02	0.00
Ave Measured	0.005	0.45	0.20	0.015	0.27	0.02	0.02	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

(6) CERTIFICATION

A. CYANIDE CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with pretreatment standards, I certify that to the best of my knowledge, cyanide has not been used or generated in our processes which are regulated by the Metal Finishing (40CFR 433) categorical pretreatment standards since the filing of the last semi-annual compliance report.

(Typed Name)

(Corporate Officer or authorized representative)

Date of Signature

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

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 waste waters 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 Pollution Control and Ecology.

N/A

(Typed Name)

(Corporate Officer or authorized representative)

Date of Signature

CORPORATE ACKNOWLEDGEMENT (Optional)

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 instruments(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 _____ 2019

Notary Public in and for _____
County, Arkansas

My commission expires _____

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

§6602 [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: Jim Bilgo - KOHLER EHS
Dennis Rodgers - 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.

Russell Skinner
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

Plant Manager of Arkansas Faucet Operations
OFFICIAL TITLE

8/5/19
DATE SIGNED

Date	GALLONS	DATE	GALLONS	Date	GALLONS	DATE	GALLONS
1/1/19	Holiday	2/1/19	51700	3/1/19	119000	4/1/19	99800
1/2/19	125800	2/2/19	62500	3/2/19	Saturday	4/2/19	70100
1/3/19	108700	2/3/19	Sunday	3/3/19	Sunday	4/3/19	100100
1/4/19	110000	2/4/19	106400	3/4/19	123000	4/4/19	109800
1/5/19	66200	2/5/19	115700	3/5/19	113000	4/5/19	90000
1/6/19	Sunday	2/6/19	103000	3/6/19	97000	4/6/19	Saturday
1/7/19	125600	2/7/19	116500	3/7/19	87000	4/7/19	Sunday
1/8/19	112500	2/8/19	69500	3/8/19	Friday	4/8/19	100000
1/9/19	114300	2/9/19	35800	3/9/19	Saturday	4/9/19	98100
1/10/19	110000	2/10/19	Sunday	3/10/19	Sunday	4/10/19	102600
1/11/19	105000	2/11/19	71000	3/11/19	118000	4/11/19	99200
1/12/19	50000	2/12/19	102300	3/12/19	94600	4/12/19	66000
1/13/19	Sunday	2/13/19	94300	3/13/19	100500	4/13/19	Saturday
1/14/19	108998	2/14/19	92500	3/14/19	99500	4/14/19	Sunday
1/15/19	109310	2/15/19	94000	3/15/19	65000	4/15/19	100100
1/16/19	112690	2/16/19	41900	3/16/19	35700	4/16/19	100300
1/17/19	112000	2/17/19	Sunday	3/17/19	Sunday	4/17/19	100200
1/18/19	83166	2/18/19	93000	3/18/19	90000	4/18/19	78000
1/19/19	44869	2/19/19	113000	3/19/19	100800	4/19/19	21000
1/20/19	Sunday	2/20/19	106000	3/20/19	94500	4/20/19	Saturday
1/21/19	111241	2/21/19	114000	3/21/19	71400	4/21/19	Sunday
1/22/19	97840	2/22/19	82000	3/22/19	84000	4/22/19	98000
1/23/19	107219	2/23/19	97000	3/23/19	Saturday	4/23/19	98700
1/24/19	124305	2/24/19	Sunday	3/24/19	Sunday	4/24/19	76000
1/25/19	117356	2/25/19	97000	3/25/19	50300	4/25/19	79200
1/26/19	53901	2/26/19	99000	3/26/19	129700	4/26/19	64500
1/27/19	Sunday	2/27/19	88000	3/27/19	100000	4/27/19	Saturday
1/28/19	101000	2/28/19	111000	3/28/19	80300	4/28/19	Sunday
1/29/19	119000			3/29/19	90000	4/29/19	75500
1/30/19	113000			3/30/19	Saturday	4/30/19	80600
1/31/19	111700			3/31/19	Sunday		
TOTAL	2655695		2157100		1943300		1907800
AVERAGE	102142		89879		92538		86718
MAX	125800		116500		129700		109800

DATE	GALLONS	DATE	GALLONS	DATE	GALLONS	DATE	GALLONS
5/1/19	110100	6/1/19	Saturday	7/1/19		8/1/19	
5/2/19	80000	6/2/19	Sunday	7/2/19		8/2/19	
5/3/19	91000	6/3/19	97000	7/3/19		8/3/19	
5/4/19	101100	6/4/19	108800	7/4/19		8/4/19	
5/5/19	Sunday	6/5/19	109200	7/5/19		8/5/19	
5/6/19	122600	6/6/19	121200	7/6/19		8/6/19	
5/7/19	115900	6/7/19	Friday	7/7/19		8/7/19	
5/8/19	94200	6/8/19	Saturday	7/8/19		8/8/19	
5/9/19	89200	6/9/19	Sunday	7/9/19		8/9/19	
5/10/19	78800	6/10/19	69600	7/10/19		8/10/19	
5/11/19	48000	6/11/19	50800	7/11/19		8/11/19	
5/12/19	Sunday	6/12/19	98100	7/12/19		8/12/19	
5/13/19	90400	6/13/19	91700	7/13/19		8/13/19	
5/14/19	90400	6/14/19	75500	7/14/19		8/14/19	
5/15/19	100200	6/15/19	80100	7/15/19		8/15/19	
5/16/19	100000	6/16/19	Sunday	7/16/19		8/16/19	
5/17/19	100200	6/17/19	55240	7/17/19		8/17/19	
5/18/19	143500	6/18/19	106000	7/18/19		8/18/19	
5/19/19	Sunday	6/19/19	79100	7/19/19		8/19/19	
5/20/19	105000	6/20/19	114900	7/20/19		8/20/19	
5/21/19	100000	6/21/19	114940	7/21/19		8/21/19	
5/22/19	80000	6/22/19	Saturday	7/22/19		8/22/19	
5/23/19	76000	6/23/19	Sunday	7/23/19		8/23/19	
5/24/19	134800	6/24/19	130000	7/24/19		8/24/19	
5/25/19	Saturday	6/25/19	45000	7/25/19		8/25/19	
5/26/19	Sunday	6/26/19	100400	7/26/19		8/26/19	
5/27/19	hoilday	6/27/19	73700	7/27/19		8/27/19	
5/28/19	100000	6/28/19	Shutdown	7/28/19		8/28/19	
5/29/19	105000	6/29/19	Saturday	7/29/19		8/29/19	
5/30/19	105000	6/30/19	Sunday	7/30/19		8/30/19	
5/31/19	Friday			7/31/19		8/31/19	
	2361400		1721280				
	98392		90594				
	143500		121200				

DATE	GALLONS	DATE	GALLONS	DATE	GALLONS	DATE	GALLONS
9/1/18		10/1/19		11/1/19		12/1/19	
9/2/18		10/2/19		11/2/19		12/2/19	
9/3/18		10/3/19		11/3/19		12/3/19	
9/4/18		10/4/19		11/4/19		12/4/19	
9/5/18		10/5/19		11/5/19		12/5/19	
9/6/18		10/6/19		11/6/19		12/6/19	
9/7/18		10/7/19		11/7/19		12/7/19	
9/8/18		10/8/19		11/8/19		12/8/19	
9/9/18		10/9/19		11/9/19		12/9/19	
9/10/18		10/10/19		11/10/19		12/10/19	
9/11/18		10/11/19		11/11/19		12/11/19	
9/12/18		10/12/19		11/12/19		12/12/19	
9/13/18		10/13/19		11/13/19		12/13/19	
9/14/18		10/14/19		11/14/19		12/14/19	
9/15/18		10/15/19		11/15/19		12/15/19	
9/16/18		10/16/19		11/16/19		12/16/19	
9/17/18		10/17/19		11/17/19		12/17/19	
9/18/18		10/18/19		11/18/19		12/18/19	
9/19/18		10/19/19		11/19/19		12/19/19	
9/20/18		10/20/19		11/20/19		12/20/19	
9/21/18		10/21/19		11/21/19		12/21/19	
9/22/18		10/22/19		11/22/19		12/22/19	
9/23/18		10/23/19		11/23/19		12/23/19	
9/24/18		10/24/19		11/24/19		12/24/19	
9/25/18		10/25/19		11/25/19		12/25/19	
9/26/18		10/26/19		11/26/19		12/26/19	
9/27/18		10/27/19		11/27/19		12/27/19	
9/28/18		10/28/19		11/28/19		12/28/19	
9/29/18		10/29/19		11/29/19		12/29/19	
9/30/18		10/30/19		11/30/19		12/30/19	
		10/31/19				12/31/18	

SEMI-ANNUAL REPORT CALCULATION WORKSHEET (January-June)

Process	Average	Maximum	Type of Discharge
Regulated (Core & Anc)	69275	218800	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	43003	91687	POTW Continuous
Total Flow to POTW	101,417.39	320,320.01	*****

TOTAL H2O TO PLANT*	NUMBER OF DAYS	AVERAGE GALLONS PER DAY	TOTAL H2O TREATED**	% OF H2O TREATED	MAXIMUM DAY TREATED**	MAXIMUM GALLONS PER DAY
20,659,200	184	112278	12746575	61.7%	147700	239387

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
12,746,575	184	69275	112278	43003	147700	239387	91687
		69274.86413	D12	C12	F12		

*NUMBERS FROM WATER BILLS

**NUMBERS FROM THE ECOLOGY LOG BOOK

Location	To Plater	USAGES				
		NE Front	SE Front	Plastics	Toilet Seats	Toilet Seats
Meter #	4097500	4098000	4099000	4100000	4110000	4111000
January	326,400	158,000	2,386,000		567,500	55,000
February	421,800	242,500	2,260,000		140,000	232,700
March	356,500	167,500	2,508,000		400,000	173,300
April	384,900	194,100	2,155,000		229,600	113,900
May	403,400	150,900	2,277,000		525,200	161,900
June	342,900	159,300	2,461,000		616,300	10,000
6MO Total	2,235,900	1,072,300	14,047,000	0	2,478,600	746,800

Faucet Plant Total 18,660,800

	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
January			0.35	0.35	0.19	0.19			0.26	0.26			0.02	0.02				
February			0.37	0.37	0.24	0.24			0.12	0.12			0.02	0.02				
March			0.58	0.58	0.13	0.13			0.28	0.28			0.02	0.02				
April			0.39	0.39	0.26	0.26			0.32	0.32			0.04	0.04				
May			0.36	0.36	0.1	0.1			0.26	0.26			0.016	0.016				
June	0.005	0.005	0.64	0.64	0.25	0.25	0.015	0.015	0.35	0.35	0.02	0.02	0.03	0.03			0.02	0.02
Max Measured	0.005		0.64		0.26		0.015		0.35		0.02		0.04		0		0.02	
Avg Measured	0.005		0.448333333		0.20		0.015		0.265		0.02		0.02		0		0.02	

ER CO.
OUTH OKLAHOMA ST.
DAN, AR 71250



7018 2290 0001 2130 1232

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R2305E123982-03



72116



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Arkansas Dept. of Env. Quality
ATTN: Guy LESTER
5301 Northshore Dr.
North Little Rock, AR 72118

