

Allen

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433

Attn: Allen Gilliam Water Div NPDES Pretreatment

<p>A. LEGAL NAME & MAILING ADDRESS: Baxter Healthcare Corporation 1900 N. Hwy. 201 Mountain Home, AR 72653</p>	<p>B. FACILITY & LOCATION ADDRESS: Baxter Healthcare Corporation 1900 N. Hwy. 201 Mountain Home, AR 72653</p>
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C. FACILITY CONTACT: Carolyn Walker, Env. Representative TELEPHONE NUMBER: 870-424-5336

<p>A. MONTHS WHICH REPORTS ARE DUE:</p>	<p>B. PERIOD COVERED BY THIS REPORT:</p>
<p>February & August</p>	<p>FROM: 02/01/2009 TO: 07/31/2009</p>

<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Electroplating Electroless plating Anodizing <input checked="" type="checkbox"/> Coating Chemical Etching and Milling Printed Circuit Board Manufacture <p><u>ANCILLARY PROCESS(ES)*</u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p>Cleaning, Polishing, Grinding</p>	<p>B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESS SINCE THE LAST REPORT ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE</p> <p><i>compliant / complete w/ notes. See accompanying 9/4/09 e-mail AB 7146</i></p> <p>AUG 2 2009</p> <p>VH</p>
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<p>C. NUMBER OF REGULAR EMPOLYEEES AT THIS FACILITY:</p> <p><u>870 Employees</u></p>	<p>D. {RESERVED}</p>
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INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge
Regulated (Core & Anc)	1,050	1,050	Batch
Regulated (Cyanide)	NA	NA	NA
§403.6(e) Unregulated*	30,260	30,260	Batch/Continuous
§403.6(e) Dilute	NA	NA	NA
Cooling Water	48,443	48,443	Continuous
Sanitary	42,588	42,588	Continuous
Total Flow to POTW	122,344	122,344	*****

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

A. TYPE OF TREATMENT SYSTEM		B. COMMENTS ON TREATMENT SYSTEM
CHECK EACH APPLICABLE BLOCK		
X	Neutralization	
X	Chemical Precipitation and Sedimentation	
	Chromium Reduction	
	Cyanide Destruction	
	Other:	
	None	

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	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Monthly Ave.	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	<0.004	3.6	1.6	<0.04	1.4	<0.007	0.16	0.062	NA
Ave. Measured	<0.004	0.657	0.194	<0.04	0.277	<0.007	0.025	0.010	NA

Avg from 8 different wastestreams = 0.81 mg/l

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

Sample Location:	See Attached Sampling Plan (Attachment #1)
Sample Type (Grab or Composite):	Grab (See Sample Plan Attachment #1)
Number of Samples and Frequency Collected:	10 (6/16/2009, 7/13/2009, 8/12/2009)
40CFR136 Preservation and Analytical Methods Use:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

A. CHECK ONE CYANIDE ANALYSIS ATTACHED EPA REGION VI CYANIDE CERTIFICATION PROVIDED BELOW

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 (40 CFR 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 PROVIDED BELOW

Based on my inquiry of the person or persons directly responsible for managing compliance with 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 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.

Glenn Burney, Plant Manager

(Typed Name)

Glenn Burney 8/20/09
(Corporate Officer or authorized representative)

Date of Signature:

CORPORATE ACKNOWLEDGEMENT (Optional)

State of Arkansas
County of Baxter

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 25th day of February, 2002.

Notary Public in and for Baxter
County, Arkansas

§6602 [42 U.S.C. 13101 et seq.] 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 reduces 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 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:

Grinding Wastewater: Investigation showed that the filter material that was last received was not of the same micron as we had been using, the vendor had substituted a different micron filter material due to them being out of the micron material that we used and sent it in under the same stock number as the correct micron filter. The correct micron filter is now in place. We have also added redundant measures to the filtering system: increased Pig Filters to two instead of one; added a water filter prior to water going to drain (See Attachment #4). We re-sampled to determine if the change in filter material was the root cause.

Spray Rinse: The analysis on the first sample pulled had a high reading for chromium, copper, and nickel – none of them were above the maximum for 1 day. We re-sampled the spray rinse to determine if this was an anomaly and the 2nd sample was very low for chromium, copper and nickel. Both samples were pulled at the same location per the sampling plan.

Baxter sold the product line that produces the needles, the new company is currently in the process of transitioning the needles production process from the Mountain Home facility. Written notification will be made when the transition is complete.

Attachments included with submission:

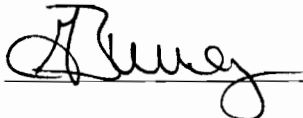
- Attachment #1 Needles Sampling Plan
- Attachment #2 Needles Wastewater Flow Schematic
- Attachment #3 Drawing of filtering system for grinder waste water
- Attachment #4 Analytical Results

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 personnel 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.

Glenn Burney, Plant Manager

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE:

 8/20/09

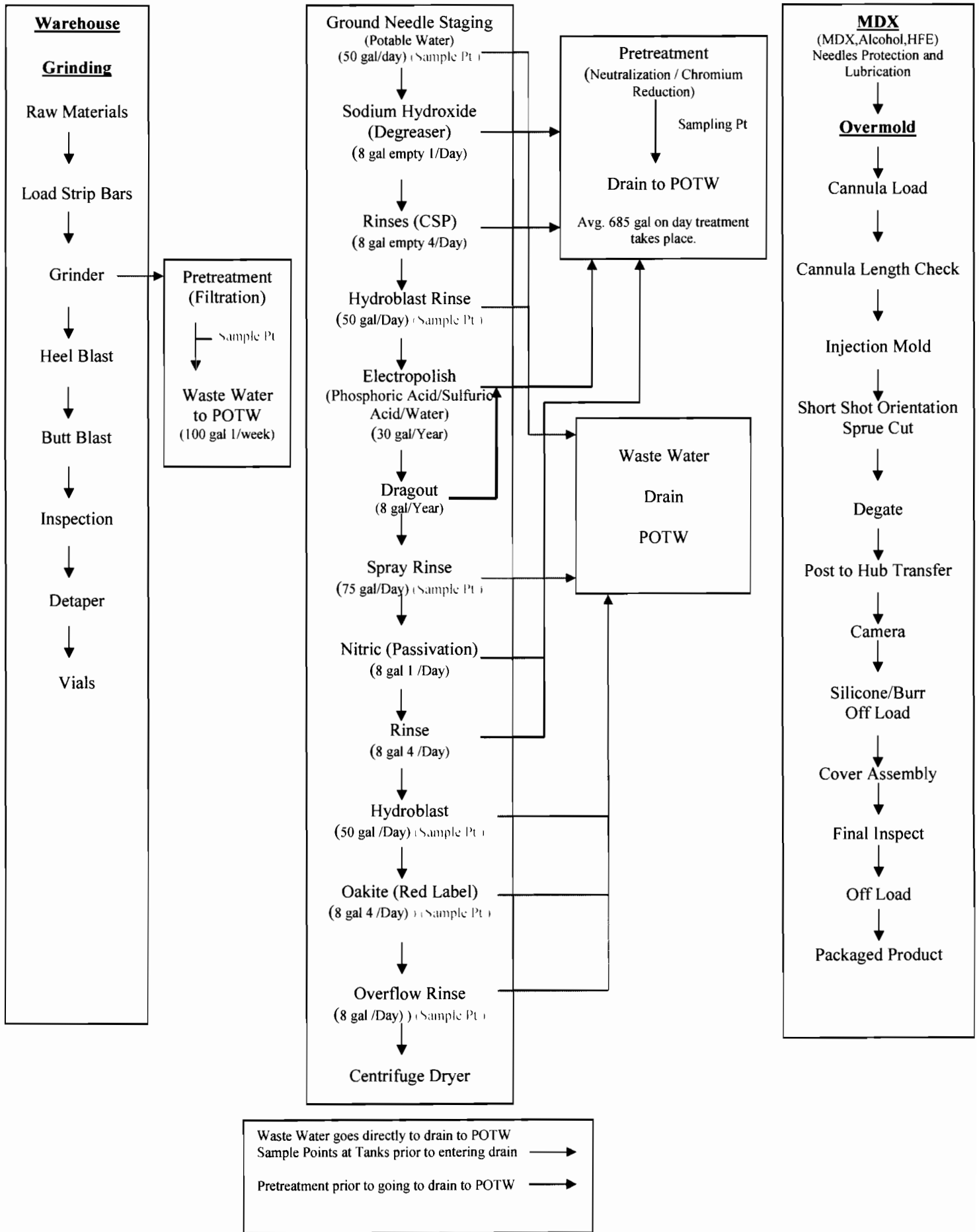
Needles Sampling Plan (40 CFR 433 Subpart A)

In accordance with 40 CFR Part 403.12(e) industrial users with processes regulated by categorical pretreatment standards (40 CFR Part 433, et al) are required to submit semi-annual reports to the ADEQ to demonstrate continued compliance when discharge from the regulated processes enter, can enter, or will enter a Publicly Owned Treatment Works (POTW). Reports are due February and August.

Sampling Plan: Sample once every 6 months. If noncompliance noted sample as needed to demonstrate compliance.

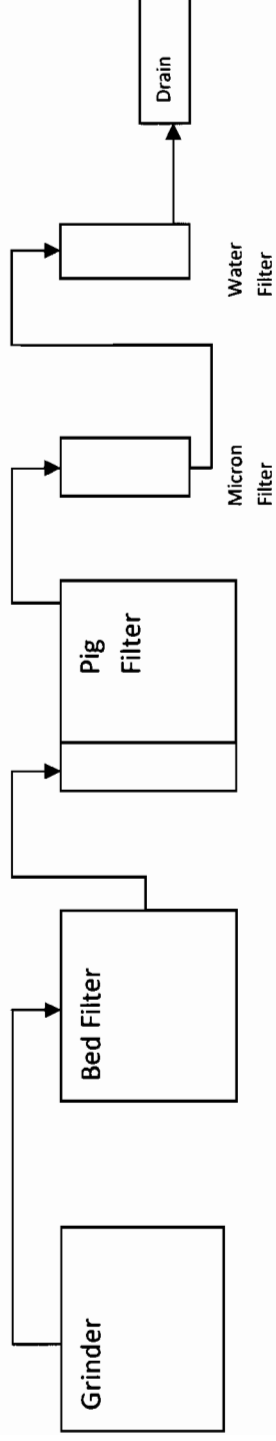
1. Sample will consist of one grab sample from pretreatment holding tank discharge point; holding tank discharge avg. 700 gal. with discharge time of 15 minutes. Pretreatment is performed on the Sodium Hydroxide bath and primary rinse water; Electropolish (Phosphoric Acid/Sulfuric Acid/Water); Nitric Acid bath and primary rinse water.
2. Sample will consist of one grab sample at the end of the batch prior to water entering drain from each separate operation: Ground Needle Staging; Hydroblast Rinse, Spray Rinse, Hydroblast Rinse, Oakite Process; Overflow rinse, filtered grinding waste water.
3. Sample effluent data to be reported semi-annually (February and August).

Needles (40CFR 433 Subpart A)



Attachment #3

Needles Grinder Waste Water Filter System



Investigation showed that the filter material that was last received was not of the same micron as we had been using, the correct micron filter is now in place. We have added redundant measures to prevent this from happening: increased Pig Filters to two instead of one; added a water filter prior to water going to drain.



Baxter Healthcare Corporation
ATTN: Ms. Carolyn Walker
1900 North Highway 201
Mountain Home, AR 72653

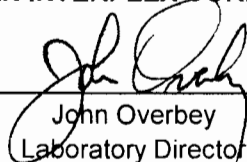
Dear Ms. Carolyn Walker:

Project Description: One (1) water sample(s) received on June 17, 2009
Needles Wastewater

This report is the analytical results and supporting information for the sample submitted to American Interplex Corporation (AIC) on June 17, 2009. The following results are applicable only to the sample identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the laboratory director or a qualified designee.

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

AMERICAN INTERPLEX CORPORATION

By _____

John Overbey
Laboratory Director

Enclosure(s): Chain of Custody



Baxter Healthcare Corporation
 1900 North Highway 201
 Mountain Home, AR 72653

ANALYTICAL RESULTS

AIC No. 130067-5
 Sample Identification: Hydroblast Rinse 2 6-16-09 10:05

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W29363	
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S25766	
Chromium	EPA 200.7	0.11	0.007	mg/l	S25766	
Copper	EPA 200.7	0.019	0.006	mg/l	S25766	
Lead	EPA 200.7	< 0.04	0.04	mg/l	S25766	
Nickel	EPA 200.7	0.054	0.01	mg/l	S25766	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S25766	
Zinc	EPA 200.7	0.019	0.002	mg/l	S25766	

AIC No. 130067-6
 Sample Identification: Oakite Bath 6-16-09 09:48

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W29363	
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S25776	
Chromium	EPA 200.7	< 0.007	0.007	mg/l	S25776	
Copper	EPA 200.7	< 0.006	0.006	mg/l	S25776	
Lead	EPA 200.7	< 0.04	0.04	mg/l	S25776	
Nickel	EPA 200.7	< 0.01	0.01	mg/l	S25776	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S25776	
Zinc	EPA 200.7	0.014	0.002	mg/l	S25776	

AIC No. 130067-7
 Sample Identification: Overflow Rinse 6-16-09 09:45

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W29363	
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S25766	
Chromium	EPA 200.7	0.064	0.007	mg/l	S25766	
Copper	EPA 200.7	< 0.006	0.006	mg/l	S25766	
Lead	EPA 200.7	< 0.04	0.04	mg/l	S25766	
Nickel	EPA 200.7	0.033	0.01	mg/l	S25766	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S25766	
Zinc	EPA 200.7	0.012	0.002	mg/l	S25766	



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1900 North Highway 201
Mountain Home, AR 72653

ANALYTICAL RESULTS

AIC No. 130067-1

Sample Identification: Ground Ndl Staging 6-16-09 09:50

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W29363	
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S25766	
Chromium	EPA 200.7	< 0.007	0.007	mg/l	S25766	
Copper	EPA 200.7	0.015	0.006	mg/l	S25766	
Lead	EPA 200.7	< 0.04	0.04	mg/l	S25766	
Nickel	EPA 200.7	< 0.01	0.01	mg/l	S25766	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S25766	
Zinc	EPA 200.7	0.021	0.002	mg/l	S25766	

AIC No. 130067-2

Sample Identification: Grinder Pretreat Filter 6-16-09 10:20

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	0.062	0.01	mg/l	W29363	
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S25776	
Chromium	EPA 200.7	3.6	0.007	mg/l	S25776	
Copper	EPA 200.7	0.26	0.006	mg/l	S25776	
Lead	EPA 200.7	< 0.04	0.04	mg/l	S25776	
Nickel	EPA 200.7	1.4	0.01	mg/l	S25776	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S25776	
Zinc	EPA 200.7	0.16	0.002	mg/l	S25776	

AIC No. 130067-3

Sample Identification: Hydroblast Rinse 1 6-16-09 10:00

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W29363	
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S25776	
Chromium	EPA 200.7	0.20	0.007	mg/l	S25776	
Copper	EPA 200.7	0.032	0.006	mg/l	S25776	
Lead	EPA 200.7	< 0.04	0.04	mg/l	S25776	
Nickel	EPA 200.7	0.055	0.01	mg/l	S25776	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S25776	
Zinc	EPA 200.7	0.032	0.002	mg/l	S25776	

AIC No. 130067-4

Sample Identification: Spray Rinse 6-16-09 10:10

Note: Sample container for Total Cyanide was not preserved to pH > 12.

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W29363	
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S25766	
Chromium	EPA 200.7	2.5	0.007	mg/l	S25766	
Copper	EPA 200.7	1.6	0.006	mg/l	S25766	
Lead	EPA 200.7	< 0.04	0.04	mg/l	S25766	
Nickel	EPA 200.7	1.2	0.01	mg/l	S25766	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S25766	
Zinc	EPA 200.7	1.0	0.002	mg/l	S25766	



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1900 North Highway 201
Mountain Home, AR 72653

ANALYTICAL RESULTS

AIC No. 130170-1

Sample Identification: Pretreatment Tank 6-16-09 10:50

<u>Analyte</u>	<u>Method</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Batch</u>	<u>Qualifier</u>
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W29363	
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S25766	
Chromium	EPA 200.7	< 0.007	0.007	mg/l	S25766	
Copper	EPA 200.7	<u>0.0065</u>	0.006	mg/l	S25766	
Lead	EPA 200.7	< 0.04	0.04	mg/l	S25766	
Nickel	EPA 200.7	< 0.01	0.01	mg/l	S25766	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S25766	
Zinc	EPA 200.7	0.0081	0.002	mg/l	S25766	



Baxter Healthcare Corporation
ATTN: Ms. Carolyn Walker
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Mountain Home, AR 72653

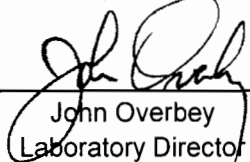
Dear Ms. Carolyn Walker:

Project Description: One (1) water sample(s) received on July 14, 2009
Needles Waste Water

This report is the analytical results and supporting information for the sample submitted to American Interplex Corporation (AIC) on July 14, 2009. The following results are applicable only to the sample identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the laboratory director or a qualified designee.

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

AMERICAN INTERPLEX CORPORATION

By  _____
John Overbey
Laboratory Director

Enclosure(s): Chain of Custody



Baxter Healthcare Corporation
ATTN: Ms. Carolyn Walker
1900 North Highway 201
Mountain Home, AR 72653

Dear Ms. Carolyn Walker:

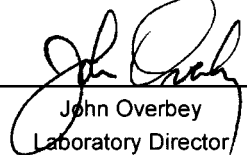
Project Description: Seven (7) water sample(s) received on June 17, 2009
Needles Wastewater

This report is the analytical results and supporting information for the samples submitted to American Interplex Corporation (AIC) on June 17, 2009. The following results are applicable only to the samples identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the laboratory director or a qualified designee.

As requested, report was revised to remove the sample identified as Pretreatment Tank 6-16-09 10:50 (AIC Control # 130067-8).

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

AMERICAN INTERPLEX CORPORATION

By  By SB
John Overbey
Laboratory Director

Enclosure(s): Chain of Custody

PDF cc: Baxter Healthcare Corporation
ATTN: Ms. Carolyn Walker
carolyn_walker@baxter.com



Baxter Healthcare Corporation
1900 North Highway 201
Mountain Home, AR 72653

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 2°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

QUALIFIERS

Qualifiers	Definition
D	Result is from a secondary dilution factor

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).

Baxter Healthcare Corporation
1900 North Highway 201
Mountain Home, AR 72653

ANALYTICAL RESULTS

AIC No. 130625-1

Sample Identification: Spray Rinse 7-13-09 / 9:58am

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W29591	
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S25940	
Chromium	EPA 200.7	< 0.007	0.007	mg/l	S25940	
Copper	EPA 200.7	0.0090	0.006	mg/l	S25940	
Lead	EPA 200.7	< 0.04	0.04	mg/l	S25940	
Nickel	EPA 200.7	< 0.01	0.01	mg/l	S25940	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S25940	
Zinc	EPA 200.7	0.012	0.002	mg/l	S25940	

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1900 North Highway 201
Mountain Home, AR 72653

ANALYTICAL RESULTS

AIC No. 131464-1

Sample Identification: Grinder Wastewater 8-12-09 8:20Am

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	0.036	0.01	mg/l	W29885	
Cadmium	EPA 200.7	< 0.004	0.004	mg/l	S26145	
Chromium	EPA 200.7	0.10	0.007	mg/l	S26145	
Copper	EPA 200.7	< 0.006	0.006	mg/l	S26145	
Lead	EPA 200.7	< 0.04	0.04	mg/l	S26145	
Nickel	EPA 200.7	0.029	0.01	mg/l	S26145	
Silver	EPA 200.7	< 0.007	0.007	mg/l	S26145	
Zinc	EPA 200.7	0.0043	0.002	mg/l	S26145	