

## Henderson, Katie

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**From:** Gilliam, Allen  
**Sent:** Friday, September 04, 2009 10:45 AM  
**To:** 'carolyn\_walker@baxter.com'; 'mhwwtp@centurytel.net'  
**Cc:** Henderson, Katie  
**Subject:** Baxter Healthcare (ARP001045) August 09 Semi Annual Report (Mountain Home AR0021211)



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Ms. Walker,

Your 8/09 semi-annual report was received (8/24/09), reviewed, deemed complete and compliant.

The high Chrome level of 3.6 mg/l on page 2 of your report was noted. That grab sample was from the "grinder pretreatment filter" only.

A footnote by this office will be made on page 2 striking that "maximum" and replacing it with the average of the regulated wastestreams sampled on that same date (6/16/09). No violation is indicated since the average sampling result of all eight (8) regulated wastestreams taken on the same day would be as follows (per your "sampling plan"):

Chrome results:

0.007 mg/l from the pretreatment tank +  
0.007 mg/l from the ground ndl. staging +  
3.6 mg/l from the grinder pret. filter +  
0.2 mg/l from the hydroblast rinse +  
2.5 mg/l from the spray rinse +  
0.11 mg/l from the hydroblast rinse +  
0.007 mg/l from the oakite bath +  
0.064 mg/l from the overflow rinse = 6.48 mg/l

6.48 mg/l divided by 8 = 0.81 mg/l Chrome = no daily max violation.

Your other "maximums" should also be calculated in this manner.

If this office has misunderstood the numbers reported, please advise.

It was also noted in your report, "Baxter sold the product line that produces the needles....". Does this mean there will be no further metal finishing core operations regulated under 40 CFR 433 at your plant in the near future?

Please keep this office abreast of "transition" of needles production process from the Mountain Home facility.

Also, please fill out and return the attached general template "closure plan" for this office's files. A copy to the City's wastewater contact, Alma Clark, would be a professional courtesy.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

cc: Katie Henderson - E:\"pretreatment reports"  
Alma Clark, Plant Supervisor, the City of Mountain Home