

Allen

STICKLER CONSULTING SERVICES, LLC

Andy Stickler – Managing Member

200 Rosewood Drive · Paragould, AR 72450 · Phone 870.236.0832 · Fax 870.239.9724 · email astick@gmco.net

7084

May 5th, 2009

MAY 27 2009

Mr. Allen Gilliam, Engineer II
Arkansas Department of Environmental Quality – Water Division
5301 Northshore Drive
North Little Rock, AR. 72118

notification only
no action necessary
AH

Re: L. A. Darling Company – Corning, AR facility. Project to evaluate elimination of the on-site wastewater treatment system.

Dear Allen:

Based on our exchange of emails a couple of weeks ago, I wanted to follow-up and provide a more detailed explanation of a project I am currently working on with the L. A. Darling Company, Corning, Arkansas facility.

As I mentioned in my initial email, this facility currently discharges wastewater to the City of Corning municipal treatment system, and triggers applicability under the “Metal Finishing Effluent Guidelines and Standards (specifically, 40 CFR 433.15 – Pretreatment Standards for Existing Sources (PSES). The only regulated “core process” (as defined in 433) in this facility, is iron phosphate conversion coating which is applied as part of the surface preparation process, prior to the application of powder paint on three (3) separate powder coating lines. Wastewater generated by this facility is limited primarily to routine overflow rinse-water from the powder coating surface preparation processes.

Given the above background information, it is also important to note, that this facility has retained a large, on-site, metals precipitation wastewater treatment system for the primary purpose of treating the routine process rinse water from the powder coating lines. This treatment system was initially installed many years ago, to manage routine rinse water from a Nickel / Chromium electroplating operation, the operation of which was terminated back in the mid-1980’s. The plating operation was completely dismantled and removed during the mid-1980’s, and the only reason that the large treatment system has remained, was because it was already in place, and the facility felt that it would serve as a safeguard in the treatment of process rinse water from the powder coating lines (although, it is doubtful that the system has provided much in the way of actual contaminate removal other than phosphate, which isn’t regulated under 433 effluent guidelines).

AFIN NO: _____ PERMIT NO: AR0033979
Media: Water
Sort: Permit Compliance
Date Scanned: 01/14/09/11

With all the above said, and given the significant cost associated with the continued operation of the large on-site treatment system (which again, appears to be providing little actual benefit in the way of pollutant removal), the L. A. Darling Corning facility initiated a project earlier this year, to define steps necessary to eliminate the on-site treatment system. Obviously, given the fact that many (if not most) powder coating operations do not perform extensive on-site treatment, the continued operation of this system represents a competitive disadvantage for the L. A. Darling Corning facility.

I currently do a considerable amount of environmental and safety consulting work for L. A. Darling Company, and have been providing guidance and support in their effort to eliminate the large treatment system. In this regard, my first concern was whether or not the process rinse water could meet compliance with the Pretreatment Standards (PSES) at 40 CRF 433.15, as well as the General Pretreatment Prohibitions, without on-site treatment. To this end, I collected samples from each rinse tank on March 26th, at a point when the tanks had several days of run time (and had not been dumped in a couple of weeks), as a worse case scenario. These samples were submitted to American Interplex (in Little Rock), for analyses to confirm the above concerns. Because Zinc appears to be the most predominate “regulated metal of concern” for powder coating operations, I selected this metal as representative of the Part 433 regulated metals. In addition, we checked pH on all the rinse tanks on-site, and also requested Oil & Grease analyses for each rinse tank sample.

Results from this preliminary round of sampling were encouraging, although I did see a potential concern with Zinc (3.6 mg/l). Oil and grease levels were all well below 100 mg/l, with the highest result being 31 mg/l, and the pH results ran between 6.5 and 7.9. **Again, please note that these results were process checks at the rinse tanks, and NOT the wastewater treatment effluent.** After seeing the Zinc result, I immediately started evaluating possible sources, and quickly found out that, indeed, the line I collected the sample from was processing some galvanized steel at the time (which they normally don’t do, and had not informed me of prior to the sampling). It is important to note, that the large on-site metals precipitation treatment system is doing it’s job in removing Zinc to levels which comply with the Part 433 PSES limitations (although this is normally not an issue, because Darling typically does not process any galvanized steel).

As follow-up to the initial round of sampling, I again collected samples from all rinse tanks on April 8th, and this time submitted to American Interplex for Zinc analysis on all three lines. In addition, we analyzed for other 433 regulated metals (Cadmium, Chromium, Copper, Lead and Nickel) from the line where I had observed the initial high reading for Zinc. The second round results again confirmed that galvanized steel was the source of the Zinc problem as suspected. In addition, this round of sampling also confirmed that the other two (2) lines had very low levels of Zinc (0.0069 mg/l and 0.0024 mg/l) respectively, and also, that the rinse water which had high levels of Zinc, had very low levels of the other Part 433 regulated metals (all within compliance with the PSES effluent guidelines at Part 433 without treatment). *** I am enclosing copies of the analytical reports for both rounds of sampling, for your review.**



L. A. Darling Company
Post Office Box 970
Paragould, AR 72451-0970

ANALYTICAL RESULTS

~~74~~
* MARCH 26th
Results

AIC No. 127896-1

Sample Identification: CRW-1 3/26/09 1400

LINE A-1 (Pase)

Analyte	Method	Result	RL	Units	Batch	Qualifier
Oil and Grease	EPA 1664A	31	5	mg/l	B5637	

AIC No. 127896-2

Sample Identification: CRW-2 3/26/09 1410

LINE A-2 (Pase)

Analyte	Method	Result	RL	Units	Batch	Qualifier
Oil and Grease	EPA 1664A	22	5	mg/l	B5637	

AIC No. 127896-3

Sample Identification: CRW-3 3/26/09 1420

LINE B (Pase)

Analyte	Method	Result	RL	Units	Batch	Qualifier
Oil and Grease	EPA 1664A	< 5	5	mg/l	B5637	

AIC No. 127896-4

Sample Identification: CRW-4 3/26/09 1430

LINE A-2 (Pase)

Analyte	Method	Result	RL	Units	Batch	Qualifier
Zinc	EPA 200.7	3.6	0.002	mg/l	S25208	

AIC No. 127896-5

Sample Identification: CWW-3 3/26/09 1440

LINE B (Tank #2)

Analyte	Method	Result	RL	Units	Batch	Qualifier
Oil and Grease	EPA 1664A	15	5	mg/l	B5637	



Corning, AR
 Please Run Analyses on Sample CRW-2 Thanks!

Client: **L.A. Darling Company**
 Project Reference: **RNISE WATER EVALUATION**
 Project Manager: **Andy Stickler**
 Sampled By: **Andy Stickler**

AIC No.	Sample Identification	Date/Time Collected	GRA B		COM P	NO OF BOTTLES	SAMPLE MATRIX	ANALYSES REQUESTED					Remarks	Received Temperature C	AIC CONTROL NO:	AIC PROPOSAL NO:	Carrier:	Field pH calibration on @	Buffer:
			W	A				S	O	I	L	TOTAL CHROMIUM							
CRW-1	4/8/09	4/8/09	✓	✓	✓	1	RAISE WATER	✓	✓	✓	✓	✓	✓						
CRW-2	4/8/09	4/8/09	✓	✓	✓	1	RAISE WATER	✓	✓	✓	✓	✓	✓						
CRW-3	4/8/09	4/8/09	✓	✓	✓	1	RAISE WATER	✓	✓	✓	✓	✓	✓						
CRWS-1	4/8/09	4/8/09	✓	✓	✓	1	RAISE WATER	✓	✓	✓	✓	✓	✓						

Container Type: _____
 Preservative: _____

Turnaround Time Requested: (Please circle) **NORMAL** or EXPEDITED IN _____ DAYS
 Expedited results requested by: **Andy Stickler**
 Who should AIC contact with questions: **Andy Stickler**
 Phone: **810-236-0832** Fax: **810-239-9724**
 Report Attention to: **Andy Stickler - W.A. Environmental**
 Report Address to: **200 Rosewood DR. Paragould, AR 72450**

Relinquished By: **Andy Stickler** Date/Time: **4/8/09/1830**
 Relinquished By: _____ Date/Time: _____

Received By: _____ Date/Time: _____
 Received in Lab By: _____ Date/Time: _____

Comments: **PLEASE Bill to: L.A. Darling Company 1200 TEN CASE**

Field pH calibration on @ _____
 Buffer: _____

T = Sodium Thiosulfate
 Z = Zinc acetate

H = HCl to pH2
 B = NaOH to pH12

V = VOA vials
 N = Nitric acid pH2

G = Glass
 NO = none
 S = Sulfuric acid pH2

Turnaround Time Requested: (Please circle) **NORMAL** or EXPEDITED IN _____ DAYS

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Corning, AR 72422
ATTN: Robert JEAN



L. A. Darling Company
Post Office Box 970
Paragould, AR 72451-0970

** April 8th Results*

ANALYTICAL RESULTS

AIC No. 128211-1
Sample Identification: CRW-1 4/8/09 1330

LINE A-1 (Ruse)

Analyte	Method	Result	RL	Units	Batch	Qualifier
Zinc	EPA 200.8	0.0069	0.002	mg/l	S25297	

AIC No. 128211-2
Sample Identification: CRW-2 4/8/09 1350

LINE A-2 (Ruse)

Analyte	Method	Result	RL	Units	Batch	Qualifier
Zinc	EPA 200.7	8.6	0.002	mg/l	S25297	
Cadmium	EPA 200.8	< 0.004	0.004	mg/l	S25297	
Chromium	EPA 200.8	< 0.007	0.007	mg/l	S25297	
Copper	EPA 200.8	0.020	0.008	mg/l	S25297	
Lead	EPA 200.8	< 0.04	0.04	mg/l	S25297	
Nickel	EPA 200.8	0.14	0.01	mg/l	S25297	

AIC No. 128211-3
Sample Identification: CRW-3 4/8/09 1340

LINE B (Ruse)

Analyte	Method	Result	RL	Units	Batch	Qualifier
Zinc	EPA 200.8	0.0024	0.002	mg/l	S25297	

AIC No. 128211-4
Sample Identification: CWS-1 4/8/09 1600

outside City Water Source

Analyte	Method	Result	RL	Units	Batch	Qualifier
Zinc	EPA 200.7	< 0.002	0.002	mg/l	S25297	

STICKLER CONSULTING SERVICES, LLC

Andy Stickler – Managing Member

200 Rosewood Drive · Paragould, AR 72450 · Phone 870.236.0832 · Fax 870.239.9724 · email astick@grnco.net

July 24th, 2009

Mr. Allen Gilliam, Engineer II
Arkansas Department of Environmental Quality – Water Division (Industrial Pretreatment)
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: L. A. Darling Company – Corning, AR facility. Project to evaluate elimination of the on-site metals precipitation wastewater treatment system.

Dear Mr. Gilliam:

As you are aware from our previous correspondence, the L. A. Darling Company Corning, AR facility has been involved in a project to evaluate the possibility of eliminating their large on-site metals precipitation wastewater treatment system. Based on this evaluation, and your response to Darling's correspondence, this document will serve as official notification that the L. A. Darling Company Corning, AR has targeted September 1st, 2009 for termination of the on-site treatment system.

Attached to this document, you will find a copy of our original correspondence on this subject, dated May 5th, 2009 (which also included preliminary analytical results from the powder coating rinse tanks). In addition, you will also find a copy of our email correspondence outlining your approval of this project, pending certification that the Darling Corning facility was no longer processing galvanized steel (based on the Zinc levels in rinse tank A-2). Finally, you will find correspondence from Mr. Tommy Campbell, Director of Operations for the Darling Corning facility, certifying the fact that this facility has totally eliminated all galvanized steel, and will no longer process any galvanized steel in the future.

Again, with the above information, the L. A. Darling Company Corning, AR facility hereby provides official notification of their intent to terminate operation of the large on-site metals precipitation treatment system effective September 1st, 2009. After this date, routine rinse water from the powder coating operations will be discharged directly to the city sewer, and any concentrated spent cleaners will be transported off-site to a commercial facility for disposal.

As always, please don't hesitate to contact me should you have questions. Your support, patience and consideration is greatly appreciated.

Sincerely,


Andy Stickler
Managing Member

ATTACHMENTS

cc: City of Corning Wastewater Superintendent

L.A. DARLING COMPANY

302 Wooten Lane • Corning, Arkansas 72422 • (870) 857-3546

July 23rd, 2009

Mr. Allen Gilliam, Engineer II
Arkansas Department of Environmental Quality – Water Division (Industrial Pretreatment)
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Certification of elimination of galvanized steel processing for the L. A. Darling Company facility located in Corning, AR. *(Attached copy of email correspondence to Mr. Andy Stickler dated June 24th, 2009)

Dear Mr. Gilliam:

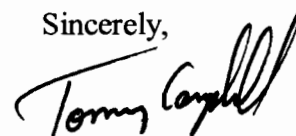
Based on previous correspondence provided by our consultant, Mr. Andy Stickler (Stickler Consulting Services), please accept this document as our official notification and certification that the L. A. Darling Company facility located in Corning, AR no longer performs iron phosphatizing on galvanized steel.

The L. A. Darling Company facility located in Corning, AR processed the last of the existing galvanized steel inventory on July 10th, 2009, and will not purchase and/or process any galvanized steel from that date forward.

We are currently in the process of eliminating operation of the on-site metals precipitation wastewater treatment system, and have targeted September 1st, 2009 for termination of that operation. As described in Mr. Stickler's previous correspondence, with elimination of the on-site treatment system, we will initiate discharge of routine rinse water from the powder coating surface preparation lines directly to the city sewer. In addition, all spent cleaners will be transported off-site to a commercial disposal facility when necessary (twice per year).

As always, please don't hesitate to contact me, or Mr. Stickler, should you have any additional questions. Your support and consideration is greatly appreciated.

Sincerely,



Tommy Campbell
Director of Operations

VISION • RESPONSIVE • RESPECT • VALUE



A member of The Marmon Group of companies

Andy Stickler

From: Andy Stickler [astick@grnco.net]
Sent: Thursday, July 23, 2009 7:18 AM
To: Andy Stickler
Subject: Fw: LA Darling Corning (ARP00000011) Flow Schematic and Request for treatment equip. removal (Corning AR0033979)

----- Original Message -----

From: "Gilliam, Allen" <GILLIAM@adeq.state.ar.us>
To: "Andy Stickler" <astick@grnco.net>
Cc: <robert.jean@ladarling.com>; "Henderson, Katie" <HENDERSONK@adeq.state.ar.us>
Sent: Wednesday, June 24, 2009 11:37 AM
Subject: LA Darling Corning (ARP00000011) Flow Schematic and Request for treatment equip. removal (Corning AR0033979)

Andy,

Your updated floor plan diagram of L.A. Darling's wastewater generating operations and sampling point were received on 6/15/09. The plan and narrative explanation of the processes was clear and meets the baseline requirements in 40 CFR 403.12(b). Thank you for this more detailed update.

Your May 5, 2009 correspondence on behalf of L.A. Darling requesting removal of pretreatment equipment is approved once the facility certifies it no longer iron phosphatizes galvanized material. This was their intent mentioned in your correspondence. Most Fe phosphatizers of cold rolled steel do not require chemical precipitation to meet the metal finishing limitations in 40 CFR 433.15.

Finally, the last semi-annual report received 1/28/09 from L.A. Darling signed by Randy Guthrie is deemed compliant and complete.

If there are any questions, please feel free to contact this office,

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

cc: Katie Henderson ("Pretreatment Reports")

-----Original Message-----

From: Andy Stickler [mailto:astick@grnco.net]
Sent: Wednesday, May 06, 2009 7:08 PM
To: Gilliam, Allen
Subject: Darling Corning Wastewater Project - Andy Stickler

Allen:

I have attached a new version of the document I prepared last night. Please discard the initial document, and use this version.

I have provided language that clarifies the rinse water issues referenced on the last page of my initial document. Again, I apologize for any confusion, and appreciate your feedback.

L. A. Darling Company
Post Office Box 970
Paragould, AR 72451-0970

ANALYTICAL RESULTS

AIC No. 130058-1
Sample Identification: CRW-2 6/16/09 1450

Analyte	Method	Result	RL	Units	Batch	Qualifier
Zinc	EPA 200.7	1.1	0.002	mg/l	S25766	

* Results from A-2 Runwater on 6/16/09.

- Galvanized steel use has dropped significantly at this point.
- Result is below regulatory limits for zinc.

* Galvanized steel processing has now been completely eliminated.

