



Feb 2, 2009

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72218-5317
Attn: Rufus Torrence, Pretreatment Engineer

Dear Mr. Torrence:

Please find attached 40CFR433 – Semi-Annual Report For Industrial Users Regulated by 40CFR428.

Due Date: 02/01-02/28/09

If there are questions, please use e-mail address:
Auddy.Doss@federalmogul.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Auddy Doss'.

Auddy Doss
Environmental Coordinator

Enclosures:

40CFR433 – Semi-annual Report For Industrial Users Regulated by 40CFR428
(FM_CIU_SAR_0209.doc)
Waste Water Flow Schematic (FM_WsteWater_Schem_0209.doc)
Analytical Results of Wastewater Sampling – 2 Pages
Chain of Custody document – 1 Page

Copies to:

Pat Fitzgerald – POTW Superintendent
City of Dumas Water & Sewer
P.O. Box 157
Dumas, AR 71639

Federal-Mogul
Dumas, AR
Environmental Coordinator - File

40CFR433 SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR428

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

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION	
<p>A. LEGAL NAME & MAILING ADDRESS Federal-Mogul Corporation Ignition Products HC 66, Box 2 Dumas, AR 71639</p>	<p>B. FACILITY & LOCATION ADDRESS Federal-Mogul Corporation Ignition Products 801 Main Street Dumas, AR 71639</p>
<p>C. FACILITY CONTACT: Auddy Doss TELEPHONE NUMBER: (870) 382-7281</p>	
(2) REPORTING PERIOD--FISCAL YEAR From: Feb 1 to Jan 31 (Both Semi-Annual Reports must cover Fiscal Year)	
<p>A. MONTHS WHICH REPORTS ARE DUE February & August</p>	<p>B. PERIOD COVERED BY THIS REPORT From: Aug 31, 2008 To: Mar 01, 2009</p>
(3) DESCRIPTION OF OPERATION	
<p>A. REGULATED PROCESSES</p> <p>40 CFR 428.56 Rubber Extrusion</p> <p>40 CFR 463 Plastic Molding</p> <p>40 CFR 428.106 Latex Dipping</p>	<p>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.</p> <p>Ref: 428.56; 463; 428.106 Federal-Mogul, Dumas, has made no changes in its' regulated material processes since submission of the most recent semi-annual report (August, 2008).</p> <p>Please see updated wastewater schematic. (Attached)</p>
<p>C. Number of Regular Employees at this Facility 118 (as of 01/15/09)</p>	<p>[Reserved]</p>

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated §428.56	522	2467	Batch (180 Days)
Regulated §463	16	75	Batch (180 Days)
Regulated §428.106	32	56	Batch (7 Days)
Cooling Water	1604	3190	Continuous
Sanitary	1208	1610	Continuous
Total Flow to POTW	3382	7398	*****

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

Process: 40 CFR 428.56, Subpart E - 4½" CV

(5a) 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 ON TREATMENT SYSTEM

Not Applicable

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)	O&G								
Max for 1 day	100								
Monthly Ave	***								
Max Measured	2.0								
Ave Measured	2.0								

Sample Location: Recirculation Pit (isolated from POTW until transferred via pumping)

Sample Type (Grab or Composite): Grab

Number of Samples and Frequency Collected: One (1) per source point; Collected when required for semi-annual report to ADEQ. Taken at end of production cycle to represent "worst case scenario". Represents approximately 180 days' cumulative waste concentration in water sample.

40CFR136 Preservation and Analytical Methods Use: Yes No

Process: 40 CFR 428.56, Subpart E & 40 CFR 463.16, Subpart A - 4½" & 3½" CV\PE

(5b) 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 ON TREATMENT SYSTEM

Not Applicable

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)	O&G								
Max for 1 day	97**								
Monthly Ave	***								
Max Measured	2.8								
Ave Measured	2.8								

** Derived from same rationale utilized to calculate maximum limit stated in ADEQ letter of 02/17/04, 14:33.

Sample Location: Recirculation Pit containing discharge outlet to POTW

Sample Type (Grab or Composite): Grab

Number of Samples and Frequency Collected: One (1) per source point; Collected when required for semi-annual report to ADEQ. Taken at end of production cycle to represent "worst case scenario". Represents approximately 180 days' cumulative waste concentration in water sample.

40CFR136 Preservation and Analytical Methods Use: Yes No

Process: 40 CFR 428.106, Subpart J – Latex Dipping

(5b) 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 ON TREATMENT SYSTEM

Not Applicable

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)	O&G								
Max for 1 day	100								
Monthly Ave	***								
Max Measured	21.0								
Ave Measured	21.0								

Sample Location: Holding Tank containing discharge outlet to POTW

Sample Type (Grab or Composite): Grab

Number of Samples and Frequency Collected: One (1) per source point; Collected when required for semi-annual report to ADEQ. Taken when appropriate, representing ISO 14001 procedures. Releases occur approximately once (1) per 5 production days.

40CFR136 Preservation and Analytical Methods Use: Yes No

(6) CERTIFICATION

A. [Reserved]

[Reserved]

B. [Reserved]

[Reserved]

STATE OF ARKANSAS)
COUNTY OF DESHA)

Before me, the undersigned authority, on this day personally appeared Auddy Doss of Federal-Mogul, 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 29th day of January, 2009

Rita Gill

Notary Public in and for Desha
County, Arkansas

My commission expires 11-29-09
Month / Day / Year



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

§6602 [42 U.S.C. 13101] 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

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

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.

DON STEPHAN

Name of Corporate Office or Authorized Representative

PLANT MANAGER

Official Title

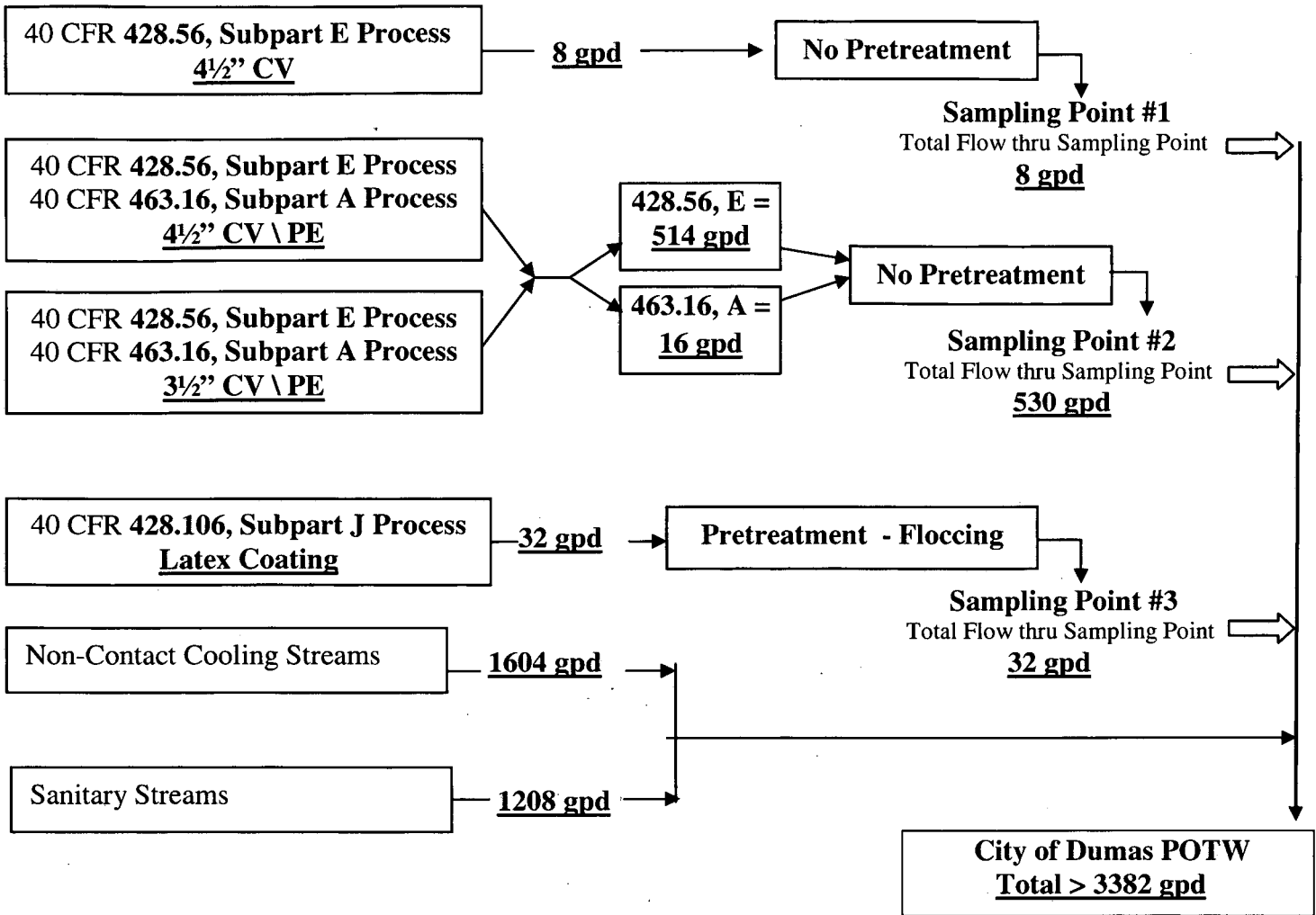
Don Stephan

Signature

1-29-09

Date Signed

Federal-Mogul Corp. - Dumas, Arkansas



If a stream is not present, show NOT PRESENT or N/P. If a stream is present, the wastewater can enter the POTW but currently has no flow, show 0.0 gpd. If a stream is present but the wastewater cannot enter the POTW, show Zero Discharge or Z/D. If an unregulated stream is present but the User has decided not to declare it at this time, show N/P.

[Handwritten Signature]

 Signature of §403.12(b) Professional

3/2/09

 Date

I certify under penalty of law that I have personally examined and am familiar with the information in this document and that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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.

Don Stephenson

 Plant Manager or the authorized §403.12(l) official

2-2-09

 Date



11701 I-30 Bldg 1, Ste 115 - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

22 January 2009

Jim Lawson
Federal-Mogul
801 Main St.
Dumas, AR 71639

RE: ADEQ-SAR
SDG Number: 0901181

Enclosed are the results of analyses for samples received by the laboratory on 15-Jan-09 09:35. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

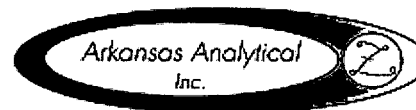
A handwritten signature in cursive script that reads "Norma James".

Norma James
President

A large, stylized handwritten letter 'S' in cursive script.

22 January 2009

Jim Lawson
Federal-Mogul
801 Main St.
Dumas, AR 71639
Project: ADEQ-SAR



Date Received: 15-Jan-09 09:35

ANALYTICAL RESULTS

Lab Number: 0901181-01
Sample Name: 3 1/2 CV/PE; Extru Proc #1
Date/Time Collected: 1/14/09 11:35
Sample Matrix: Water

Wet Chemistry	Units	Result	Date/Time Analyzed	Batch	Method
Oil and Grease	mg/L	2.8	1/22/09 9:00	A901211	1664A

ANALYTICAL RESULTS

Lab Number: 0901181-02
Sample Name: 4 1/2 CV; Extru Proc #2
Date/Time Collected: 1/14/09 11:40
Sample Matrix: Water

Wet Chemistry	Units	Result	Date/Time Analyzed	Batch	Method
Oil and Grease	mg/L	2.0	1/22/09 9:00	A901211	1664A

ANALYTICAL RESULTS

Lab Number: 0901181-03
Sample Name: CR; Extru Proc #3
Date/Time Collected: 1/14/09 11:50
Sample Matrix: Water

Wet Chemistry	Units	Result	Date/Time Analyzed	Batch	Method
Oil and Grease	mg/L	21	1/22/09 9:00	A901211	1664A

QUALITY CONTROL RESULTS

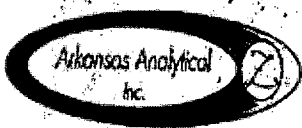
Wet Chemistry -- Batch: A901211 (Water)

Prepared: 22-Jan-09 09:00 By: AT -- Analyzed: 22-Jan-09 09:00 By: AT

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Oil and Grease	<1.0 mg/L	89.0% / 88.4%	83.2% / NA		0.688%	

All Analysis performed according to EPA approved methodology when available:
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods, 20th Edition.
Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Reviewed by: _____
Norma James
President



11701 Interstate 30, Bldg. 1, Ste. 115
 Little Rock, AR 72209
 PHONE: 501-455-3233
 FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION				Project Description		Turnaround Time	Preservation Codes:						
Federal-Mogul 801 Main St. Dumas, AR 71639				ADEC - SAR		24 Hour	1. Cool, 4 Degrees Centigrade	4. Thiosulfate for Decoloration					
Attn: Jim Lawson				Telephone: 870-382-7214 870-382-7218		49 Hour	2. Sulfuric Acid (H ₂ SO ₄), pH < 2	5. Hydrochloric Acid (HCl)					
				FAX: 870-382-4840 870-382-7230		72 Hour	3. Nitric Acid (HNO ₃), pH < 2	6. Sodium Hydroxide (NaOH), pH > 13					
				Bill to P.O. #:		Routine (5 Day)	TEST PARAMETERS				Sample Type Code		
Sampler(s) Signature				Sampler(s) Printed		Protective Code	1,2					G = Gas, P = H2O	
						Bottle Type	GA					V = Vapor, A = Acid	
												Arkansas Analytical Work Order Number: 0901181	
Field Number	SAMPLE COLLECTION		Geo	Comp	Lab	Sample	SAMPLE IDENTIFICATION/ DESCRIPTION		Oil and Grease				
	Date/Time	Time/Sec											
32	01/14/09	11:35			1	W	Extru Proc #1		X				01
45	01/14/09	11:40			1	W	Extru Proc #2		X				02
62	01/14/09	11:50			1	W	Extru Proc #3		X				03
1. Relinquished by: (Signature)				Date/Time		2. Received by: (Signature)		SAMPLE CONDITION UPON RECEIPT IN LAB				REMARKS / SAMPLE COMMENTS	
Jim Lawson				1-14-09 11:55 AM		Burt Reed		1. CUSTODY SEALS: <input checked="" type="checkbox"/> Yes ___ No					
3. Relinquished by: (Signature)				Date/Time		4. Received by: (Signature)		2. CONTAINERS CORRECT: ___ Yes ___ No					
Velocity				1:15:09 0935		Sydney James		3. COC LABELS AGREE: ___ Yes ___ No					
								4. PRESERVATION CONFIRMED: ___ Yes ___ No					
								5. RECEIVED ON ICE: ___ Yes ___ No					
								6. TEMPERATURE ON RECEIPT: 1°C					
FOR COMPLETION BY LAB ONLY													

22 January 2009
 Jim Lawson
 Federal-Mogul
 801 Main St.
 Dumas, AR 71639
 Project: ADEC-SAR

Date Received: 15-Jan-09 09:35

CHAIN OF CUSTODY FORM(S)

Federal Mogul
Ignition Products
801 S. Main
Dumas, AR 71639

OF THE RETURN ADDRESS, FOLD AT DOTTED LINE
CERTIFIED MAIL™



7008 1300 0000 6308 0662

**FEDERAL
MIGUL**



Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317
Attn: Rufus Torrence, Pretreatment Engineer