

611 Country Club Rd.  
Pocahontas, AR 72455



# MACLEAN-ESNA

Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

July 12, 2011

Attention: Allen Gilliam

Re: MacLean-ESNA Compliance Assessment Visit – CAV (ARP001048; Pocahontas #AR 0034835) and letter from ADEQ dated May, 18, 2011.

Dear Allen,

Pursuant to the above referenced CAV Report, MacLean-ESNA has initiated a Corrective Action (CA) within the ISO 14001 Environmental Management System. The CA is attached, and addresses the following actions.

- Construct shed over the “aeration” basin (“weir”)
- Create AutoCAD Drawing of chemical treatment tanks in a schematic view (not to scale)
- Create process flow chart diagram of parts through the process. (may be combined with AutoCAD drawing above)
- Update list of all Toxic Organic Chemicals incl. bar stock raw materials.
- Create numbering system for the tanks, determine Toxic Organic Chemicals present in tanks from MSDS's (not trade names).
- Create updated AutoCAD drawings of Pretreatment/Aeration Basin (“Weir”)
- Clarify “aeration” vs. “oil & water separator, and settling” basin with ADEQ and update all documentation to match.
- Update Process Flow Description verbiage for Toxic Organic Management Plan
- Rewrite TOMP and update with all the above and including 14001 where appropriate
- Submit revised TOMP to ADEQ

If this letter and attached corrective action plan does not meet your needs, please let us know. If there are any changes or unforeseen issues arise, we will keep you informed.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Merwitz', is written over a large, stylized 'X' mark.

Dave Merwitz  
General Manager  
MacLean-ESNA  
611 Country Club Road  
Pocahontas, AR 72455



## Internal Corrective Action I11-0110

| DateOpened  | ItemNo | ItemDesc | Qty | SONo | AssignedTo   | DateClosed |
|---|--------|----------|-----|------|--------------|------------|
| 7/14/2011   | NA     | NA       |     | NA   | Autry,Donnie |            |
| <b>ProbDesc</b><br>ADEQ audit findings for the waste water pre-treatment system. - ADEQ audit of the Wastewater pretreatment system showed deficiencies in the system; specifically in the requirement for "a brief narrative description of the nature...of the operations carried out by MacLean-ESNA. This description should include a schematic process diagram which indicated points of discharge to the POTW from the regulated processes". Further details of the issues can be found in the letter and report from ADEQ dated May 18, 2011. |        |          |     |      |              |            |
| <b>Containment</b><br>There is no immediate "containment" of this issue necessary. There was no violation of the permit and no "Notice of Violation" issued by the ADEQ. All issues will be addressed by the permanent corrective action.   |        |          |     |      |              |            |
| <b>RootCause</b><br>ADEQ/MacLean-ESNA Compliance Assessment Visit – (ARP001048; Pocahontas #AR 0034835) and letter from ADEQ dated May, 18, 2011.   |        |          |     |      |              |            |
| <b>PermanentCA</b><br>Construct shed over the "aeration" basin ("weir") Thielemier 8/1/2011<br>Create AutoCAD Drawing of chemical treatment tanks in a schematic view (not to scale). Poague & Associates, Inc. 9/15/2011<br>Create process flow chart diagram of parts through the process. (may be combined with AutoCAD drawing above) Poague & Associates, Inc. 9/15/2011<br>Update list of all Toxic Organic Chemicals incl. hex steel raw materials. Poague, Oriole, Tate. 9/15/2011  |        |          |     |      |              |            |
| <b>PermCA Verification</b><br>Acceptance of the CA Plan by ADEQ<br>Completion of all elements and acceptance of revised TOMP by ADEQ<br>Completion of the "shed" over the aeration basin  |        |          |     |      |              |            |
| Can mistake proofing be used to correct this problem? <input type="checkbox"/> Is this Environmental And/Or Safety? <input checked="" type="checkbox"/>   |        |          |     |      |              |            |
| Can this Corrective Action be used to improve the Quality of other Parts or Processes? <input type="checkbox"/>   |        |          |     |      |              |            |
| <b>Explanation</b><br>Note: If boxes are checked Yes, otherwise No.   |        |          |     |      |              |            |
| <br><br><br><br>  |        |          |     |      |              |            |