

Wilson, Tabatha

From: Gilliam, Allen
Sent: Thursday, February 13, 2014 10:43 AM
To: malcolm.oliver@fluid.contitech.us
Cc: Fuller, Kim; Wilson, Tabatha; scottytw@centurytel.net
Subject: AR0035602_Contitechs ARP001034 Feb 2014 semi-annual Pretreatment report and TOMP discussion with ADEQ reply_20140213
Attachments: Semi Annual report Feb. 2014.pdf
Importance: High

Malcolm,

Contitech's semi-annual Pretreatment report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in the Federal Pretreatment reporting requirements in 403.12(e) and more specifically compliant with the Metal Finishing standards in 40 CFR 433.17.

In the future, per 40 CFR 403.12(o)(1), please include a complete chain of custody to accompany the analytical results.

It has been duly noted the toxic organic management plan (TOMP) submitted by Contitech's previous owner (Parker Hannifin) remains approvable and applicable to Contitech since there have been no process or chemical changes made since its submittal.

Per 40 CFR 403.12(o)(2), "[Contitech] shall be required to retain for a minimum of 3 years any records of monitoring activities and results (whether or not such monitoring activities are required by this section) and shall make such records available for inspection and copying by the [ADEQ] and the Regional Administrator..."

The baseline monitoring report (BMR), TOMP, process description and wastewater flow schematics should be kept indefinitely.

Thank you for your timely report remaining in compliance with the Federal Pretreatment Regulations in 40 CFR 403.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

cc: Scotty Jones, Trumann's Water & Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Malcolm Oliver [<mailto:Malcolm.Oliver@fluid.contitech.us>]
Sent: Wednesday, February 12, 2014 12:58 PM
To: Gilliam, Allen

Subject: Semi-Annual Waste Water Report

Importance: High

Mr. Gilliam,

Attached is the Semi-Annual waste water report for ContiTech in Trumann, AR. The next report will be submitted in August 2014.

If this report is not submitted to your satisfaction, please let me know.

Mit freundlichen Grüßen / Best regards

Malcolm Oliver

Toolroom Team leader
Product Market Segment Air Conditioning
Business Unit ContiTech Fluid Technology
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748 Hwy 463 South
Trumann AR 72472 USA
tel.:870-483-0512 EXT 330
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ContiTech North America, Inc.
748 Hwy 463 South
Trumann, AR 72472
Phone 870-483-0512

February 12, 2014

Allen Gilliam
ADEQ NPDES Engineer
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

RE: Semi-Annual report
Toxic Organic Management Plan

Dear Mr. Gilliam:

Enclosed is the August Semi-Annual report for the ContiTech facility located in Trumann, Arkansas. The next Semi-Annual report will be submitted in August 2014.

The Toxic Organic Management Plan for our facility remains the same as the plan that was submitted February 27, 2012 by Ray Copeland under Parker Hannifin Corporation. ContiTech purchased this facility from Parker Hannifin in October 2012 but the activities in this facility remain the same.

Sincerely,



Malcolm Oliver
Engineering Tech



Gary Wrinkle
Facility Manager
Authorized Representative

Enclosure

CC: Scotty Jones, Manager
Trumann Waterworks
106 E Main St.
Trumann, AR 72472

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433

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

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION

A. LEGAL NAME & MAILING ADDRESS

CONTITECH
748 Hwy 463 South
Trumann, AR 72472

B. FACILITY & LOCATION ADDRESS

CONTITECH
748 Hwy 463 South
Trumann, AR 72472

C. FACILITY CONTACT: Malcolm Oliver **TELEPHONE NUMBER:** (870)483-0512 **e-mail:** Malcolm.Oliver@fluid.contitech.us

(2) REPORTING PERIOD--FISCAL YEAR From Feb 1 to Jan 31 (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

February & August

B. PERIOD COVERED BY THIS REPORT

FROM: 8/13 **TO:** 2/14

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

CHECK EACH APPLICABLE BLOCK

- Electroplating
- Electroless Plating
- Anodizing
- Coating
- Chemical Etching and Milling
- Printed Circuit Board Manufacture

ANCILLARY PROCESS(ES)*

LIST BELOW EACH PROCESS USED IN THE FACILITY

- Cleaning
- Etching
- _____
- _____
- _____
- _____

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.

*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

C. Number of Regular Employees at this Facility
18

D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Cyanide)	2250	2250	Batch once per month
' 403.6(e) Unregulated*			
' 403.6(e) Dilute			
Cooling Water			
Sanitary	750	830	Continuous
Total Flow to POTW			*****

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

(5) 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

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	<0.0011	0.038	0.079	<0.016	<0.016	<0.022	.318	<0.010	0.169
Ave Measured	<0.0011	<0.038	<0.079	<0.015	<0.016	<0.022	.312	<0.010	

Sample Location Sump

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected One, Semi-annual

40CFR136 Preservation and Analytical Methods Use: Yes No

(6) CERTIFICATION

A. [Reserved]

[Reserved]

B. CHECK ONE: ' 433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED X ' 433.12(a) TTO CERTIFICATION

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

Gary Wrinkle
(Typed Name)

Gary Wrinkle
(Corporate Officer or authorized representative)

Date of Signature 2-11-14

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS)
COUNTY OF _____)

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 _____ day of _____, 200__.

Notary Public in and for _____
County, Arkansas

My commission expires _____.

(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.

Gary Wrinkle
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

Facility Manager
OFFICIAL TITLE

2-11-14
DATE SIGNED

10 February 2014

Malcolm Oliver
ContiTech
748 Hwy. 263 S
Trumann, AR 72472
Project: Wastewater Sample



Date Received: 05-Feb-14 10:07

ANALYTICAL RESULTS

Lab Number: 1402024-01
Sample Name: Wastewater
Date/Time Collected: 2/4/14 9:45
Sample Matrix: Water

Total Metals	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cadmium	mg/L	0.00113		2/5/14 15:41	A402032	200.7, Rev 4.4 (1994)
Chromium	mg/L	0.0384		2/5/14 15:41	A402032	200.7, Rev 4.4 (1994)
Copper	mg/L	0.0795		2/5/14 15:41	A402032	200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0165		2/5/14 15:41	A402032	200.7, Rev 4.4 (1994)
Nickel	mg/L	0.0291		2/5/14 15:41	A402032	200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0220		2/5/14 15:41	A402032	200.7, Rev 4.4 (1994)
Zinc	mg/L	0.312		2/5/14 15:41	A402032	200.7, Rev 4.4 (1994)
Wet Chemistry	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cyanide (total)	mg/L	< 0.010	E20	2/9/14 14:22	A402076	4500-CN B,E-1999

QUALITY CONTROL RESULTS

Total Metals -- Batch: A402032 (Water)

Prepared: 05-Feb-14 10:16 By: ST -- Analyzed: 05-Feb-14 14:50 By: ST

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Cadmium	<0.000550 mg/L	87.0% / NA	90.3% / 87.2%		3.53%	
Chromium	<0.0110 mg/L	88.9% / NA	91.9% / 88.9%		2.02%	
Copper	<0.00550 mg/L	88.8% / NA	86.7% / 84.1%		2.43%	
Lead	<0.0165 mg/L	88.2% / NA	87.4% / 84.7%		3.12%	
Nickel	<0.0110 mg/L	89.6% / NA	91.5% / 87.3%		3.73%	
Silver	<0.0220 mg/L	89.8% / NA	89.8% / 86.2%		4.12%	
Zinc	<0.00550 mg/L	89.6% / NA	93.4% / 90.7%		2.90%	

Wet Chemistry -- Batch: A402076 (Water)

Prepared: 09-Feb-14 11:19 By: KP -- Analyzed: 09-Feb-14 14:22 By: KP

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Cyanide (total)	<0.010 mg/L	96.0% / NA	66.7% / 95.0%		35.1%	%D1, D

QUALIFIER(S)

- *%D1: Matrix Spike and/or Matrix Spike Duplicate Percent Recovery Does Not Meet Laboratory Acceptance Criteria
- *D: RPD Value Does Not Meet Laboratory Acceptance Criteria
- *E20: Estimated Result Due to Matrix Spike and/or Matrix Spike Duplicate Failure; This sample was used as the "parent sample" in MS/MSD prep.