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APR 21 2009

Earl V. Hightower  
Environmental/Safety Mgr

Fluid Systems Division-Mena  
500 North Morrow Street  
Mena, AR 71953

T (479) 394-8757  
F (479) 394-8805  
Earl.hightower@emotors.com

hit

April 20, 2009

complete/compliant  
AE

Mr. Rufus Torrence  
NPDES Pretreatment Engineer  
Water Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

RE: April 18, 2008, Pretreatment Report for Fluid Systems Division, Mena Plant  
Permit Number ARP000026 AFIN Number 57-00001 (Mena AR0036692)

Dear Mr. Torrence:

In accordance with 40 CFR Part 403.12(e), Fluid Systems Division, Mena Plant is submitting its Semi-Annual Discharge Report to you for review.

Please call me at (479) 394-8757 if you have any questions regarding the attached report.

Cordially,

Earl V. Hightower  
Environmental/ Safety Manager

NPDES PERMIT FILE  
NPDES # AR0036692  
AFIN # 57-00001  
Permit PN  
Correspondence  
Technical Backup  
04/20/09 Date Scanned

cc:

Mike Spencer, Mena Waste Water Treatment Plant, 323 Polk County Road 53  
Randy Wiseman, Director of EHS, Emerson Motor Co.

**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**

**LEGAL NAME & MAILING ADDRESS**

Fluid Systems Division – Mena Plant  
500 North Morrow Street  
Mena, AR 71953

**B. FACILITY & LOCATION ADDRESS**

Fluid Systems Division – Mena Plant  
500 North Morrow Street  
Mena, AR 71953

**C. FACILITY CONTACT:** Earl Hightower, Env/Safety Mgr

**TELEPHONE NUMBER:** (479) 394-8757

**(2) REPORTING PERIOD--FISCAL YEAR From Oct 1 to Sep 30 (Both Semi-Annual Reports must cover Fiscal Year)**

**A. MONTHS WHICH REPORTS ARE DUE**

October & April

**B. PERIOD COVERED BY THIS REPORT**

**FROM** October 2008 **TO:** April 2009

**(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

Parts Washing \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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

**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.

**C. Number of Regular Employees at this Facility** 355

**D. [Reserved]**

**(4) FLOW MEASUREMENT**

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Anc)	143	3780	Batch
Regulated (Cyanide)	-	-	-
§403.6(e) Unregulated*	-	-	-
§403.6(e) Dilute Cooling Water	79		Continuous
Sanitary	7600		Continuous
Total Flow to POTW	7822		XXXXXXXXXXXX

\*"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	0.69	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Monthly Ave	0.26	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	< 0.004	0.005	0.010	< 0.010	0.155	<0.001	0.019	<0.010	--
Ave Measured	< 0.004	0.005	0.010	< 0.010	0.155	<0.001	0.019	<0.010	--

Sample Location Discharge from Wastewater System

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected 1 every 6 months

40CFR136 Preservation and Analytical Methods Use:  Yes  No

**(6) CERTIFICATION**

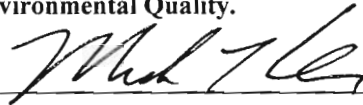
**A. CYANIDE CERTIFICATION (Applicability Pending)**

[Reserved]

B. CHECK ONE:  §433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED  §433.12(a) TTO CERTIFICATION PROVIDED BELOW

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.

Mark Kinder, Plant Manager  
(Typed Name)



(Corporate Officer or authorized representative)

Date of Signature April 20, 2009

**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:

- ◆ Continued maintenance of RPZ valves.
- ◆ Chemical precipitation of regulated streams prior to discharge.
- ◆ Floor drains in Manufacturing areas sealed.

**(8) GENERAL COMMENTS**

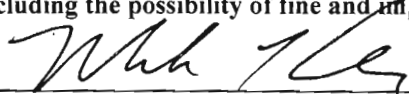
N/A

**(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.

**Mark Kinder**

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE



SIGNATURE

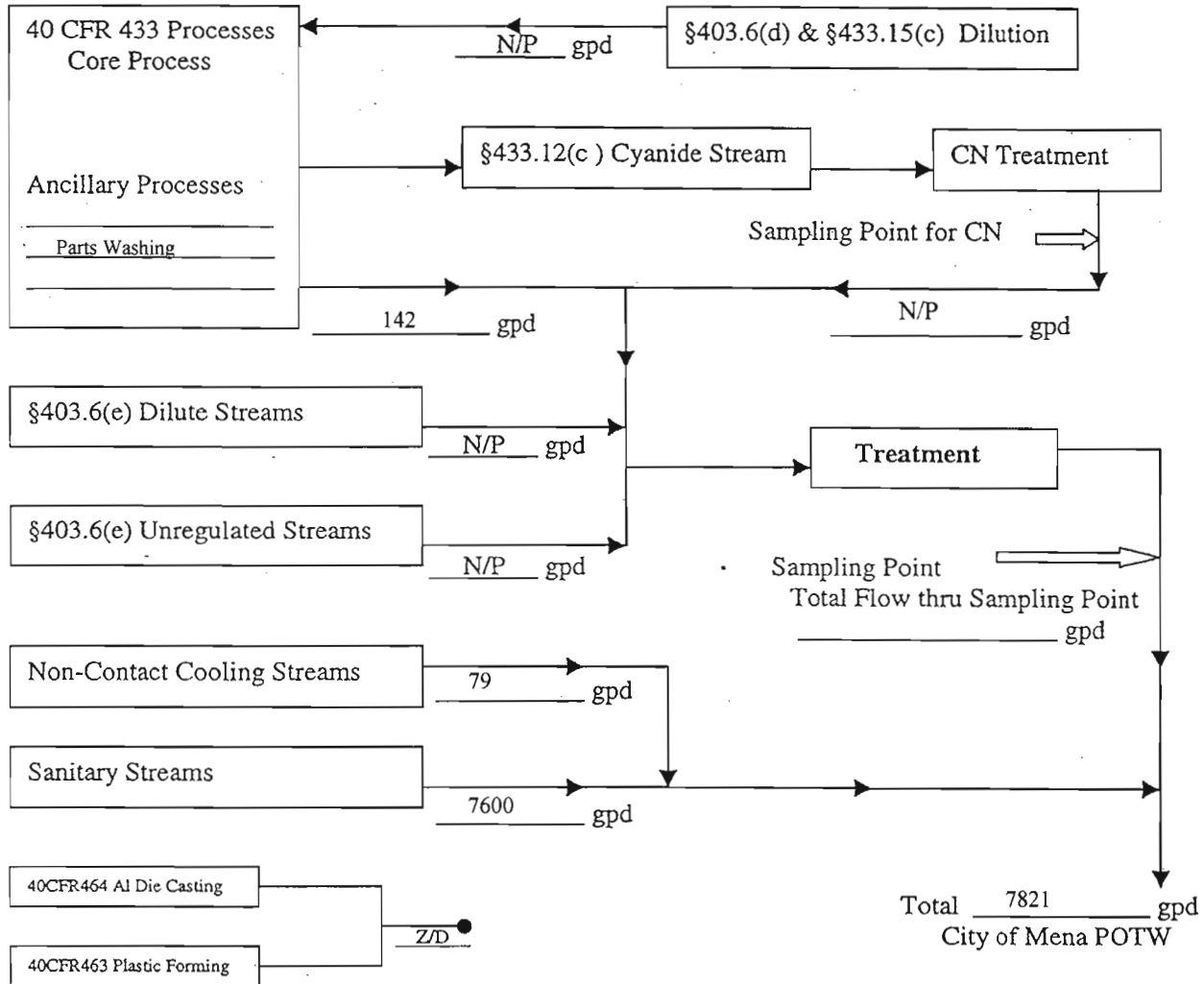
**Plant Manager**

OFFICIAL TITLE

**April 20, 2009**

DATE SIGNED





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

4-20-09  
 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.

*[Handwritten Signature]*  
 Plant Manager or the authorized §403.12(l) official

4-20-09  
 Date





# Environmental Services Company, Inc.

Corporate Office  
 13715 West Markham  
 Little Rock, AR 72211  
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch  
 1107 Century Avenue  
 Springdale, AR 72762  
 Tel. (501)750-1170 Fax (501)750-1172

Control Number: 0703010251  
 Customer Name : U.S. ELECTRICAL MOTORS  
 Customer Number : 478  
 Report Date : 03/21/07  
 Sample Date : 03/07/07  
 Sample Time : 1230  
 Sample Type : GRAB WWATER  
 Sample From : WASTEWATER  
 Collected By: EARL HIGHTOWER  
 Delivery By : UPS  
 Work Order :  
 Purchase Order :

### Laboratory Analysis

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
03/15	1334 BGW	Mercury, TCLP	< 0.0010	mg/L		EPA 1311/245.1	1.80	95.0 *
03/20	1012 BGW	Silver, TCLP	< 0.01	mg/L		EPA 7760	2.00	100.5 *
03/14	1000 NTR	Cyanide Total (as CN)	< 0.0100	mg/L		EPA 335.2	1.56	98.7
03/20	1158 BGW	Chromium, TCLP	0.013	mg/L		EPA 1311/200.7	0.00	106.6 *
03/20	1415 BGW	Arsenic, TCLP	0.027	mg/L		EPA 1311/200.7	0.40	99.7 *
03/20	1158 BGW	Selenium, TCLP	0.010	mg/L		EPA 1311/200.7	1.49	93.8 *
03/20	1158 BGW	Cadmium, TCLP	< 0.004	mg/L		EPA 1311/200.7	0.98	101.7 *
03/20	1158 BGW	Barium, TCLP	0.017	mg/L		EPA 1311/200.7	0.94	104.9 *
03/20	1158 BGW	Lead, TCLP ✓	< 0.010	mg/L		EPA 1311/200.7	0.00	100.3 *

\* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Earl Hightower  
 Environmental Services Co., Inc.