Attn: Jeff Wages, EHS Coordinator
Syrgis Performance Intiators
334 Phillips 311 Road
West Helena, AR 72342

Re: AFIN 54-00092 ARP001013

On October 31, 2005 I conducted an inspection of your West Helena facility; I thank you for taking the time to show me the plant. Syrgis recently purchased a part of the Norac plant. Norac still retains possession of the Metallic Sterate production area. Syrgis purchased the organic peroxide (MEK peroxide and benzoyl peroxide) production area.

The processes are all continuous and Syrgis discharges to the POTW the wastewater regulated by 40 CFR 414 (Suppart H – Specialty Organic Chemicals). There are two important concepts which I need to follow-up with you.

First, EPA is stressing the importance of preventing pollution at its source before the pollutants enter the wastewater rather than polluting and treating the wastewater. Syrgis has no formal written P2 (Pollution Prevention) plan but Syrgis claims to employ P2 practices in their plant; these practices include: Water Reuse; "Green" Purchasing; Spent Solvent Reclamation, etc.

Second, Syrgis is taking grab samples for all the regulated pollutants. The pretreatment regulations require specific sampling procedures for each type of pollutant; in accordance with 40 CFR 403.12(g)(3), "*Grab samples must be used for pH, cyanide, total phenols, oil and grease, sulfide, and volatile organic compounds. For all other pollutants, 24-hour composite samples must be obtained through flow-proportional composite sampling techniques, unless time-proportional composite sampling or grab sampling is authorized by the Control Authority [ADEQ].* Since Syrgis processes are continuous and the wastewater flow is continuous and steady, I have no problem with Syrgis using time-proportional composite sampling; nonetheless, I do recommend that Syrgis look into flow-proportional composite sampling. I recommend that Syrgis review this ISCO website to select appropriate sampling equipment:

http://www.isco.com/products/products1.asp?PL=201

If you have concerns, please do not hesitate to contact my office:

Rufus J. Torrence, NPDES Pretreatment Engineer
ARKANSAS DEPT OF ENVIRONMENTAL QUALITY
Water Division
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317
Phone: (501)682-0626
Fax: (501)682-0910
Email: torrence@adeq.state.ar.us

Pretreatment Industrial Inspection
Facility Information

Facility Name: The Syrgis Performance	Site Address: 334 Phillips 311 Road West Helena, AR 72342
Signatory Authority (Name & Title): Scott Ahlers, Plant Manager	
Phone: (870) 572-9061	Mailing Address (if different):
Fax: (870) 572-1416	Same
Address: Same	Corporate Owner Name and address (if applicable):
"	Syrgis Performance Products
Phone: "	Stockholm, Sweden
Fax: "	Phone: +46 8 545 12160
Contact Person (Name & Title):	Fax: +46 8 545 121 70
Jeff Wages	Corporate CEO: Andy Harris
e-mail:	e-mail: aharris@syrgis.com
Facility Permit # N/A or ARP00 1013	**Last Inspection Date:** 4-27-05
POTW (City) IU discharges to: Helena WTP	POTW's NPDES #AR00 43389
Industrial Classification: ☒ Categorical	☐ Significant AFIN 54-00092
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 414.85	

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	"No" indicates item does not exist at the facility and attachments aren't necessary	
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Comments : Subpart H - Specialty Organic Chemicals

Inspector's Name (Print): Rufus Torrence	Signature:
IU Rep's Name (Print) Scott Ahlers	Signature:
Date and Time Inspection Ended: 10-31-07 @ 1:40 pm	

I. Summary of Inspection

A. Inspection and Objective (Complete Before Inspection)

☐ Permit Renewal	☒ Annual – Bi	☐ Spill/Slug	☐ Unscheduled
☐ New Construction	☐ Noncompliance	☐ Follow-up	☐ Complaint

Inspection Objective(s)

Checklist of items to be reviewed and/or visually inspected:

☒ Pre-inspection Meeting	☐ Permit Conditions	☐ Safety Concerns
☒ Process Inspection	☒ Pretreatment Process	☐ TOMP
☒ Chemical Storage	☒ Discharge point(s)	☒ Spills/Slug Control Plan
☐ Records Review	☐ RCRA information	☐ Process/Flow/Pretreatment Schematics
☐ IU sampling procedures	☐ Flow/pH Meter(s)	☐ Calibration Records
☐ MSDS Inventory List	☐ New MSDS	☐

Comments:

B. Inspection Analysis

Were there any deficiencies/violations identified and noted during the inspection? ☐ Yes ☒ No

Provide a brief narrative of deficiencies/violations or other concerns in the following areas:

Records Review

Process Area(s)

Pretreatment System

Self Monitoring Procedures

Diversion/Sewer Meters

Spill/Slug Control Plan

Sampling Point

Chemical Storage

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 10-31-07 @ 11:45am	SIC code(s): 2869
IU Reps/Titles: Jeff Wages, EHS	Control Authority Reps/Titles: Rufus Torrence, Pret Eng
End product(s): Organic Peroxides & Metallic Sterates	Approx. # of units produced: 18,500tons
Days of Operation: M-F	Days of Production (if different):
Hours of Operation: 24 hr/day	Hours of Production (if different):
Shift 1, hrs.: 7 to 3 pm	Shift 2, hrs.: 3 to 11 pm / Shift 3, hrs.: 11 to 7 am
# of Employees: 105	Peak Mos.: May / "Off" Mos.: December

Are there any scheduled plant shutdowns? Yes ☑ No ☐ N/A ☐ If yes, when? Last 2 weeks/year

Are there designated plant clean-up days? Yes ☐ No ☒ N/A ☐ If yes, when?

Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes ☒ **No** ☐

If **No**, explain:

Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes ☐ No ☒

If Yes, explain:

Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: ☐ Yes. ☒ No

If Yes, explain:

Has there been any changes since the last inspection regarding the following items:

Plant/flow/process layout? Yes ☐ No ☒ If yes, obtain copy of updated schematic for facility file.

Processes? Yes ☐ No ☒ If yes, explain:

Production Levels? Yes ☐ No ☒ If yes, explain:

Raw materials? Yes ☐ No ☒ If yes, explain:

Flow rates? Yes ☐ No ☒ If yes, explain

Are regulated and non-regulated wastestreams combined?	yes ☐	no ☒	
Prior to Pretreatment System?	yes ☐	no ☒	N/A ☐
If Yes, was the CWF used to calculate limits?	yes ☐	no ☐	
Prior to connection to the POTW sanitary sewer?	yes ☐	no ☒	N/A ☐
At connection to sanitary sewer?	yes ☐	no ☒	N/A ☐
Production and flows verified for Production-Based Standards?	yes ☐	no ☐	N/A ☒

What is the current avg. production rate and process flow?

"N/A prod rate" & 36,000 gpd

Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? yes ☐ no ☐ N/A

B. Facility Permits		
Permit Type	Permit No.	Expiration Date
Air		
RCRA	ARR000016899	
NPDES	ARR000303	10-31-2008
Other SPB-Water	2543-W	

C. Additional Comments
(Note which section or attachment comments are regarding)

Attachment A: Industrial Process(es)

List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not

1. MEK Peroxide	Yes ☒ No ☐	4.	Yes ☐ No ☐
2. Benzoyl Peroxide	Yes ☒ No ☐	5.	Yes ☐ No ☐
3.	Yes ☐ No ☐	6.	Yes ☐ No ☐

Were processes visually inspected? Yes ☒ No ☐ N/A ☐

Brief description of process(es):

Manufacture of MEK peroxide & benzoyl peroxide
benzoyl peroxide is a hardner or "initiator" in the plastic industry

General observations of facility's indoor housekeeping: Good

General observations of area outside facility's building: Good

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured (M) or estimated (E). If batch (B) discharged, list frequency and volume (1000 gal/month, e.g.).

☐ Process Rinse Overflows	☐ Equip. Cleanup	☐ Floor Cleanup	☐ Spent Bath Solutions
☐ Product Cleaning	☐ Forklifts Maint./Wash	☐ Tank Dragout	☐ Air Pollution Devices
☒ Boiler Blowdown 100+gpd	☐ Spent Rinse Tanks	☐ Equipment Coolants	☒ Non-Contact Cooling Water
☐ Stormwater	☐	☐	☐

List Major Raw Materials and Chemicals used:

Methyl Ethyl Ketone, Hydrogen Peroxide, Suffuric Acid, Dimethyl Phthalate Benzoyl Cholride

Check Waste Stream Pollutants of Concern from Process(es)

☐ BOD	☑ CN^-	☑ Metals (List) Pb & Zn	☐ Solvents (List)
☐ TSS	☐ Cl_2		
☐ O&G	☐ S^-		
☐ pH	☒	TOXIC Organic	

Are there floor drains in the Process area? ☒ Yes ☐ No If yes list number and the location of all floor drains:

None have access to POTW; all WW is pumped to treatment

Attachment B: Pollution Prevention (P2) / Recycling Activities		
Does the facility have a written P2 Plan?	Yes ☐	No ☒
Does this facility practice P2?	Yes ☐	No ☒
Environmental Management System in place?	Yes ☐	No ☒
ISO Certified?	Yes ☐	No ☐
Written Standard Operating Procedures?	Yes ☑	No ☐
Explain:		
Preventative Maintenance Program	Yes ☑	No ☐ (hydraulic systems, valves, pumps, etc)
Explain:		
Water Reuse:	Yes ☑	No ☐
Explain:		
Cost Accounting to Track Savings:	Yes ☐	No ☑
Explain:		
Inventory Control / "Green Purchasing":	Yes ☑	No ☐ (lean manufacturing/"env. friendly purchasing", etc)
Explain:		
Employee Training:	Yes ☑	No ☐
Explain:		
Spent Solvent Reclamation?	Yes ☑	No ☐
Explain:		
Recycle Paper, Aluminum, Boxes, and Pallets?	Yes ☐	No ☒
Explain:		
Recycle Waste Oil, Solvents, and Lubricants?	Yes ☑	No ☐
Explain:		
Other Activities		
P2 Equipment/Practices in use:		

☑ Overflow Alarms	☐ Aqueous Cleaning Solutions
☐ Fog Spray Rinsing	☐ Countercurrent Rinsing
☐ Dragout Collection Trays	☐ Seal-Less Pumps
☐ Air Jets to Blow Parts Dry	☐ Secondary Containment of Process Solutions
☐ Aqueous Paint Stripping Solutions	☐ Bead Blasting to Remove Paint
☐ Water Soluble Cutting Fluids	☐ Recycle Overspray
☐ In-Process Recycle (Ion Exchange, Reverse Osmosis)	☐ Conductivity Meters
☐ Dead Rinse Tanks	☐ Bath / Rinse Filtration

Attachment C: Pretreatment System

Are wastestreams segregated before pretreatment?	☐ Yes	☐ No	☐ N/A
Are they pretreated prior to discharge to the sanitary sewer?	☐ Yes	☐ No	☐ N/A
Was the pretreatment system visually inspected during this visit?	☒ Yes	☐ No	☐ N/A

Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:

☐ Dissolved air floatation	☐ Membrane Tech.	☐ Ion Exchange	☐ Biological Treatment
☐ Centrifugation	☐ Flow Equalization	☐ Ozonation	☐ Chlorinating
☐ Chemical Precipitation	☐ Oil/Water Separation	☐ Reverse Osmosis	☐ Grit Removal
☐ Sludge Filter Press	☐ Grease Trap	☐ Screen	☐ Solvent Separation
☐ pH Adjustment	☐ Sand Trap	☐ Sedimentation	☐ Silver Recovery
☐ Belt/Disk Oil Skimmer	☐	☐	☐

Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):

2 ponds
First is settling pond
Second pond is "polishing"

Does the description match the schematic currently on file? ☐ Yes ☐ No ☒ N/A

System Operator(s) Name:

N/A

Does discharge permit require licensed operator? ☐ Yes ☐ No ☒ N/A

Is the System Operator(s) licensed by the State of Arkansas (per Reg. # 3?) ☐ Yes ☐ No ☒ N/A

List Name(s) and License classification:

Is training provided to the Pretreatment System Operator(s)? ☐ Yes ☐ No ☒ N/A

If Yes, list type and frequency:

Is the discharge from the Pretreatment System? ☐ Batch ☑ Continuous ☐ Combination

If any discharges are batch type or combination, describe the following:

Volume of each batch: gallons per

Describe process from which batch originated (spent bath, e.g.):

Approximate duration of batch discharge:

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
N/A		

Attachment D: Chemical Storage Area(s)

Does the facility have a designated chemical storage area(s)? ☒ Yes ☐ No

Was this area(s) visually inspected? ☒ Yes ☐ No ☐ N/A

Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. MEKP ①	☐ Yes ☒ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
3.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
4.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer

Does the Chemical Storage Area(s) contain any of the following?

☒ Dikes, Berms for Containment	☐ Plugs for Floor Drains
☐ Secondary Tanks for Holding	☐ Premix (low) Concentrations
☐ Alarms	☐ Chain restraints, limited access
☐ Spills Control Kits for Cleanup	☒ Notification Procedures
☒ Chemical desegregation within Storage Area	☐ Other

Chemical Inventory List (MSDS) on file? ☒ Yes ☐ No ☐ N/A

Were any new MSDS reviewed during the Inspection? ☐ Yes ☒ No ☐ N/A

If yes, list below:

Chemical storage comments: ① Norac is primarily a chemical company so chemicals are stored over the entire plant but Norac does have a bulk storage area; other storage areas are scattered over acreage and the areas are isolated for safety. Earth berms prevent surface run-off.

Chemical handling procedures (totes, dolly, buckets, hardline, etc):

Attachment E: Spill/Slug Control Plan	
Does the facility have a Spill/Slug control plan?	☐ yes ☒ no 0
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	☐ yes ☐ no ☐ N/A
(A) Describes discharge practices including non routine batch (slug) discharges	☐ yes ☐ no ☐ N/A
(B) Describes storage and handling of chemicals	☐ yes ☐ no ☐ N/A
(C) Procedures for immediate notification to POTW of slug discharges	☐ yes ☐ no ☐ N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	☐ yes ☐ no ☐ N/A
2. Describes procedures and equipment for emergency response	☐ yes ☐ no ☐ N/A
3. Describes follow-up to limit damage suffered by POTW or environment	☐ yes ☐ no ☐ N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☐ no ☐ N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no ☐ N/A
If no:	
Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☐ no
Is it posted in areas where chemicals are used and stored?	☐ yes ☐ no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no
Have there been any non-routine, episodic discharges or chemical spills in the past year?	☐ yes ☐ no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? ☐ yes ☐ no ☐ N/A	

Visual Inspection of Discharge Lines/Points	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point	Discharge from polishing pond
Total Flow Monitoring Point	Estimated using city water meter
Upstream Manhole	
Point of Connection:	

(1) N/A no central plant; scattered "satellite" plants with no direct access to POTW.

Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title.

Operator was using "Grab" but instructed to use 24 hr time composite

Where is the sample point located?

☐ End of Process	☒ Pretreatment Effluent	☐ Total Flow
☐ Combined Flow	☐ Metered Flow	☐ Flow Actuator
☐ Private Manhole	☐ Utility Manhole	☐ Advance Notice Required
☐ Safety Hazards Identified	☐	☐

Is the Sample Collection Site Adequate?	☐ Yes ☐ No ☐ N/A
Does the facility rep. request a split sample on this sampling/inspection?	☐ Yes ☐ No
Does the facility perform self-monitoring tests in-house?	☐ Yes ☒ No ☐ N/A

If no, record the name and address of Contract Lab:

Rineco Analytical Services

Automatic Sampler ☐ or Manual ☐

IU Self-Monitoring Results reviewed:	☐ Yes ☐ No ☐ N/A
Is the Contract Lab certified by ADEQ for test parameters?	☒ Yes ☐ No ☐ N/A
Dates and Times of Sample Analysis Recorded?	☐ Yes ☐ No ☐ N/A
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)	☐ Yes ☐ No ☐ N/A
EPA recommended holding times being met (Refer to 40CFR Part 136)	☐ Yes ☐ No ☐ N/A
Chain of Custody Records for Self-Monitoring Samples Reviewed	☐ Yes ☐ No ☐ N/A
Were correct Sample Types Collected	☐ Yes ☐ No ☐ N/A
Dates and times of Sample Collection Recorded?	☐ Yes ☐ No ☐ N/A
Were Samples preserved correctly (refer to 40CFR Part 136)	☐ Yes ☐ No ☐ N/A
Were Self Monitoring records on file for past 3 years?	☐ Yes ☐ No ☐ N/A

List the parameters the facility monitors and the frequency:

☐ Cd(t)	☐ Cu(t)	☐ Cr(t)	☐ Ni(t)	☐ Pb(t)
☐ Ag(t)	☐ Zn(t)	☐ pH	☐ CN^-(t)	☐ CN^-(a-c)
☐ TTO-Vol	☐ TTO-B/N	☐ TTO-A.E.	☐ TTO-Pest	☐ Cr(hex)
☐	☐	☐	☐	☐

Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433

How does the IU report TTO? ☒ Analysis ☐ Certification Statement

Does the facility have a Toxic Organic Management Plan? ☐ Yes ☐ No ☒ N/A

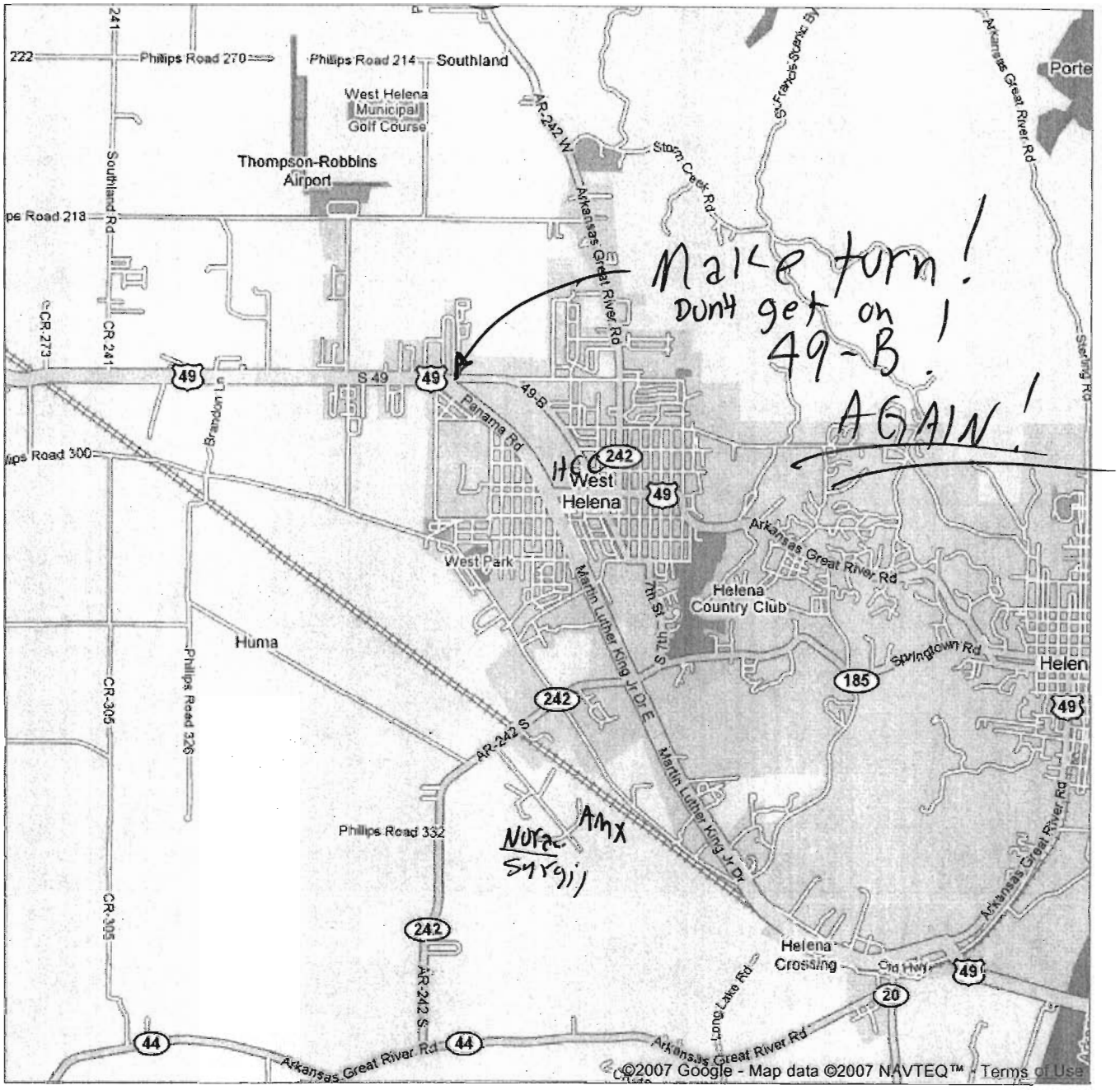
If yes, Does the plan show how toxic organics are used, stored, and disposed? ☐ Yes ☐ No ☒ N/A

List the date of the last revision to the TOMP:

Is the TOMP being followed as written? ☐ Yes ☐ No ☒ N/A (If no, provide explanation in comments.)

If no, is there evidence that a TOMP is needed? ☐ Yes ☐ No ☒ N/A (If yes, provide description of evidence in comments.)

Comments:



Helena Chemical Co

The Norac Co Henry's Cell #

Amerimax (501) 622-8653