

Gilliam, Allen

From: Paul Burns <PaulBurns@RWU.ORG>
Sent: Thursday, October 13, 2011 1:36 PM
To: Gilliam, Allen
Subject: addendum to AR0043397_Rogers' 2011 Pretreatment Audit-P2 Assessment Corrective Actions Response

Mr. Allen Gilliam,

I apologize for not addressing Swift Chemicals' operations in the response. Since the Audit - I introduced myself over the phone to Bob Swift and dropped off in person a new IU Survey with a copy of the old one from 1990. I also gave him a copy of the list of soap manufacturing 40CFR categories. He indicated that the City of Rogers (via Luanne Diffin) had his drains plugged back in 2003. A Rogers Water Utility employee that accompanied Luanne Diffin during that site visit, verified this. Based on my conversations with Bob Swift on the phone, the review of the Industrial User Survey received 10/10/11, and a short site visit, it is most likely that Swift Chemical falls under the following 417 SOAP AND DETERGENT MANUFACTURING subcategories:

[Subpart F--MANUFACTURE OF SOAP FLAKES AND POWDERS SUBCATEGORY](#)

§ 417.60 Applicability; description of the manufacture of soap flakes and powders subcategory.

The provisions of this subpart are applicable to discharges resulting from all operations associated with the manufacture of soap flakes and powders, commencing with the drying of the neat soap to and including packaging of the finished flakes and powders.

§ 417.66 Pretreatment standards for new sources.

Any new source subject to this subpart that introduces process wastewater pollutants into a publicly owned treatment works must comply with 40 CFR part 403.

[60 FR 33953, June 29, 1995]

[Subpart H--MANUFACTURE OF LIQUID SOAPS SUBCATEGORY](#)

§ 417.80 Applicability; description of the manufacture of liquid soaps subcategory.

The provisions of this subpart are applicable to discharges resulting from the blending of ingredients employed in the manufacture of liquid soaps and the packaging of the finished products.

§ 417.86 Pretreatment standards for new sources.

Any new source subject to this subpart that introduces process wastewater pollutants into a publicly owned treatment works must comply with 40 CFR part 403.

[60 FR 33954, June 29, 1995]

[Subpart P--MANUFACTURE OF LIQUID DETERGENTS SUBCATEGORY](#)

§ 417.160 Applicability; description of the manufacture of liquid detergents subcategory.

The provisions of this subpart are applicable to discharges resulting from all operations associated with the manufacture of liquid detergents, commencing with the blending of ingredients, to and including bottling or packaging finished products.

§ 417.166 Pretreatment standards for new sources.

Any new source subject to this subpart that introduces process wastewater pollutants into a publicly owned treatment works must comply with 40 CFR part 403. In addition, the following pretreatment standard establishes the quantity or quality of pollutants or pollutant properties, controlled by this section, which may be discharged to a publicly owned treatment works by a new source subject to the provisions of this subpart.

(a) There shall be no discharge of waste water streams in which both the COD/BOD 7ratio exceeds 10.0 and the COD exceeds 1.10 kg/kkg of anhydrous product.

(b) For waste streams having either a ratio of COD to BOD 7 of 10.0 or less or having a COD content of 1.10 kg/kkg of anhydrous product or less the pretreatment standard shall be:

(1) For normal liquid detergent operations the following values pertain:

Pollutant or pollutant property	Pretreatment standard
BOD 5	No limitation.
COD	Do.
TSS	Do.
Surfactants	Do.
Oil and grease	Do.
pH	Do.

(2) For fast turnaround operation of automated fill lines, the following values pertain; the maximum for any one day when the number of turnarounds exceeds eight in any thirty consecutive day period shall be the sum of the appropriate value below and that from paragraph (b)(1) of this section; and the average of daily values for thirty consecutive days shall be the value shown below multiplied by the number of turnarounds in excess of eight and prorated to thirty days plus the appropriate value from paragraph (b)(1) of this section:

Pollutant or pollutant property	Pretreatment standard
BOD 5	No limitation.
COD	Do.
TSS	Do.
Surfactants	Do.
Oil and grease	Do.
pH	Do.

[40 FR 27455, June 30, 1975, as amended at 60 FR 33955, June 29, 1995]

After carefully reviewing the various subcategories, it appears that if Swift Chemical were to discharge wastewater, the only limitation beyond 40 CFR part 403 regulations involves whether or not liquid detergent wastewater from Swift Chemical has **both** a COD:BOD7 ratio greater than 10 and the COD exceeds 1.10 kg/kkg of anhydrous product. According to the survey, various liquid products are mixed in 55 gallon dedicated drums and rinsate, if any, is added back to drum and held for the next production run.

In addition, Swift Chemicals has been inspected and fined more than once by the EPA for not following FIFRA regs (including earlier this year). According to Bob Swift, this is due to his use of Barquat MB-50. It appears that FIFRA regulation requires that formulations using this chemical must be registered with the EPA.

Based on the above information, a letter will be issued to Swift Chemical outlining key findings and requiring Swift Chemical to continue its practice of zero discharge of production related wastewater. In the future, if Swift Chemical asks for permission to discharge, Swift Chemical would have to be permitted and each batch of wastewater (from producing liquid detergent) would have to meet the regulations with respect to the above mentioned COD limits.

Please let me know if you have any questions or comments.

Regards,

358/HL #8516#

Pretreatment Coordinator

Industrial Pretreatment, Food Service Grease Abatement, Pollution Prevention

ROGERS WATER UTILITIES

ROGERS POLLUTION CONTROL FACILITY

Rogers, Arkansas

479-273-7378 x109