

Peltier, Hannah

From: Gilliam, Allen
Sent: Friday, December 05, 2014 12:01 PM
To: tracy payne; bmac@bmpaint.com; mtidwell@bmpaint.com; mhopkins@bmpaint.com
Cc: Fuller, Kim; Peltier, Hannah; davidrcamdenh2o@cablelynx.com
Subject: AR0022365_B & M Painting ARP00001058 early Dec 2014 semi annual Pretreatment reporting results and certification statements with ADEQ reply_20141205
Attachments: cover letter 184290-184576.pdf; ADEQ cover letter 181707-976.pdf; ADEQ cover letter 182976.pdf; American Interplex 184290-11-4-14.pdf; American Interplex 184576-11-11-14.pdf

Tracy,

Apologies for the delay in responding to your repeat sampling for B&M Painting's December 2014 semi-annual report and their certification statements. After reviewing B&M's two (2) subsequent sampling results for Cr from "POTW 1" B&M is back in compliance with the Metal Finishing standards in 40 CFR 433.17 and the reporting requirements in 40 CFR 403.12(g)(2). No further action is deemed necessary at this time.

Note: Regarding the "broken" chains of custody (C of C), those forms must have sampler's name, date and time; "sampler relinquished by sampler; "Received by" [legible signature] w/date and time; relinquished by [legible signature] w/date and time; [legible signature] "Received in lab..."

If you'll notice the C of C with sample taken on 11/4/14, I see Sandy White conducted the sampling, but the C of C does not indicate the sample was relinquished by her and "received by: "B??? McCall" (illegible). Who had custody of that sample between Sandy and "B??? McCall"? There's your major "break" in the chain.

It appears it was sent by common carrier to American Interplex via UPS. As long as the C of C was placed in a plastic bag and sealed in the container picked up by the common carrier, that's about as much as can be expected since most common carrier drivers will not sign for anything.

A complete C of C for each set of samples or sample taken is in your best interest as the analytical results following an broken C of C may not be admissible in a court of law if it ever came to that.

If you have any further questions or comments please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

From: Tracy Payne [<mailto:tpayne@bmpaint.com>]
Sent: Monday, November 17, 2014 2:32 PM
To: Gilliam, Allen
Cc: davidrcamdenh2o@cablelynx.com; bmac@bmpaint.com; mtidwell@bmpaint.com; mhopkins@bmpaint.com
Subject:

Allen

Here are the latest samples for November as requested in your last email dated 10-10-14. "You may continue sampling/analyzing/reporting through October 2014 for your own compliance assurance, but submittal of at least one more chrome analysis during the next month (November) from "POTW #1" will be necessary to keep B&M from meeting the significant non-compliance (SNC) criteria in 40 CFR 403.8(f)(2)(iii)(B)."

Here is the cover letter for the November reports 184290 and 184576. Sorry I forgot this step. Look forward to hearing what we need to do to correct our chain of custody requirements. (from e-mail dated 11/21/14)

Please see attached cover letters with required certification statement as listed in 40 CFR 403.12(I) in response to email sent by Matt Hopkins on 9-30-14 as well as the email I sent on 10-3-14. (from e-mail dated 10/6/14)

Please let me know if you need any more reports at this time.

Thank you

Tracy Payne
B&M Painting Co., Inc.
Phone: 870.836.3388
Fax: 870.836.3399
Cell: 870-833-2610
www.bmpainting.com

Notice: This e-mail, together with any attachments, is intended only for the use of the addressees. It contains B&M Painting Co., Inc. information that is privileged, confidential, proprietary or otherwise protected from disclosure. If you are not the addressee, then the review, distribution or other use of, or pursuing of any action in reliance upon this information is strictly prohibited. The information may be subject to the United States Export Control Laws and Regulations and its misuse could be a criminal offense. If received in error, please notify the sender immediately and destroy the original message, its attachments and all copies.



B&M PAINTING CO., INC.

347 Van Buren
Camden, Arkansas 71701
(870) 836-3388

Allen Gilliam
ADEQ State Pretreatment Coordinator

11-17-2014

This report contains analytical results and supporting information for samples under control number 184290,184576.

I certify under penalty of law that 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 person 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.

Sincerely,



Tracy Payne

B&M Painting Co., Inc.
Phone: 870.836.3388
Fax: 870.836.3399



B&M PAINTING CO., INC.

347 Van Buren
Camden, Arkansas 71701
(870) 836-3388

Allen Gilliam
ADEQ State Pretreatment Coordinator

10-6-2014

This report contains analytical results and supporting information for samples under control number 181707, 182483, 182674, 182976.

I certify under penalty of law that 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 person 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.

Sincerely,

Tracy Payne

Brian McCasland

B&M Painting Co., Inc.
Phone: 870.836.3388
Fax: 870.836.3399



B&M PAINTING CO., INC.

347 Van Buren
Camden, Arkansas 71701
(870) 836-3388

Allen Gilliam
ADEQ State Pretreatment Coordinator

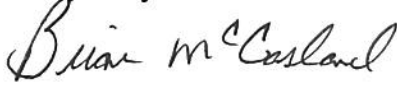
10-6-2014

This report contains analytical results and supporting information for samples under control number 182976.

I certify under penalty of law that 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 person 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.

Sincerely,


Tracy Payne


Brian McCasland

B&M Painting Co., Inc.
Phone: 870.836.3388
Fax: 870.836.3399



B & M Painting Co., Inc.
ATTN: Mr. Mat Hopkins
347 Van Buren
Camden, AR 71701

This report contains the analytical results and supporting information for samples submitted on November 5, 2014. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Laboratory Director or a qualified designee.

A handwritten signature in black ink that reads 'Steve Bradford'.

Steve Bradford
Deputy Laboratory Director

This document has been distributed to the following:

PDF cc: B & M Painting Co., Inc.
ATTN: Mr. Mat Hopkins
mhopkins@bmpaint.com

B & M Painting Co., Inc.
ATTN: Lab
lab@bmpaint.com



B & M Painting Co., Inc.
347 Van Buren
Camden, AR 71701

SAMPLE INFORMATION

Project Description:

Two (2) water sample(s) received on November 5, 2014
Rinse Water
P.O. No. AI110414-SW

Receipt Details:

A Chain of Custody was provided. The samples were delivered in one (1) ice chest.
Ice chest #1 was delivered with shipping documentation.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

<u>Laboratory ID</u>	<u>Client Sample ID</u>	<u>Sampled Date/Time</u>	<u>Notes</u>
184290-1	POTW 1 11-4-14 13:00	04-Nov-2014 1300	
184290-2	POTW 2 11-4-14 13:00	04-Nov-2014 1300	

Case Narrative:

There were no qualifiers for this data and all samples met quality control criteria.

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).
"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.
"Standard Methods for the Examination of Water and Wastewaters", (SM).
"American Society for Testing and Materials" (ASTM).
"Association of Analytical Chemists" (AOAC).



B & M Painting Co., Inc.
347 Van Buren
Camden, AR 71701

ANALYTICAL RESULTS

AIC No. 184290-1

Sample Identification: POTW 1 11-4-14 13:00

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Chromium EPA 200.7	< 0.007	0.007	mg/l	
Prep: 05-Nov-2014 1115 by 302	Analyzed: 06-Nov-2014 1306 by 302		Batch: S37683	

AIC No. 184290-2

Sample Identification: POTW 2 11-4-14 13:00

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Chromium EPA 200.7	0.15	0.007	mg/l	
Prep: 05-Nov-2014 1115 by 302	Analyzed: 06-Nov-2014 1309 by 302		Batch: S37683	



B & M Painting Co., Inc.
 347 Van Buren
 Camden, AR 71701

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Chromium	0.5 mg/l	103	85.0-115			S37683	05Nov14 1116 by 302	06Nov14 1246 by 302		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Chromium	184281-1	0.5 mg/l	95.5	75.0-125	S37683	05Nov14 1116 by 302	06Nov14 1249 by 302		
	184281-1	0.5 mg/l	97.3	75.0-125	S37683	05Nov14 1116 by 302	06Nov14 1253 by 302		
	Relative Percent Difference:			1.85	20.0	S37683			

LABORATORY BLANK RESULTS

Analyte	Result	RL	PQL	QC Sample	Preparation Date	Analysis Date	Qual
Chromium	< 0.007 mg/l	0.007	0.007	S37683-1	05Nov14 1116 by 302	06Nov14 1243 by 302	

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: B + M Painting Co.			PO No. AI 110414 - SW		NO OF BOTTLES Chrome	ANALYSES REQUESTED										AIC CONTROL NO: 184290				
Project Reference: Rinse Water			MATRIX													AIC PROPOSAL NO:				
Project Manager: Tracy Payne			WATER													Carrier: UPS				
Sampled By: Sandy White			COMPO												Received Temperature C 3.1°C					
AIC No.	Sample Identification	Date/Time Collected	GAB	COMP	WATER	SOIL											Remarks			
① 1	POTW 1	13:00 11-4-14	X				1	X												
② 2	POTW 2	13:00 11-4-14	X				1	X												
Container Type			Preservative												Field pH calibration on _____ @ _____					
G = Glass NO = none			P = Plastic S = Sulfuric acid pH2		V = VOA vials N = Nitric acid pH2		H = HCl to pH2 B = NaOH to pH12		T = Sodium Thiosulfate Z = Zinc acetate		A = (NH ₄) ₂ SO ₄ , NH ₄ OH					Buffer:				
Turnaround Time Requested: (Please circle) NORMAL or EXPEDITED IN 2 DAYS Expedited results requested by: 11-6-14							Relinquished By: [Signature]			Date/Time 13:05 11-4-14			Received By:			Date/Time				
Who should AIC contact with questions: Tracy Payne Phone: 870-836-3398 / 870-836-3399 Report Attention to: Tracy Payne Report Address to: 347 Van Buren St.							Relinquished By:			Date/Time			Received in Lab By: [Signature]			Date/Time 11/5/14 0950				
Email Address: Camden AR 71701							Comments:													



B & M Painting Co., Inc.
ATTN: Mr. Mat Hopkins
347 Van Buren
Camden, AR 71701

This report contains the analytical results and supporting information for samples submitted on November 12, 2014. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Laboratory Director or a qualified designee.

A handwritten signature in black ink that reads 'Steve Bradford'.

Steve Bradford
Deputy Laboratory Director

This document has been distributed to the following:

PDF cc: B & M Painting Co., Inc.
ATTN: Mr. Mat Hopkins
mhopkins@bmpaint.com

B & M Painting Co., Inc.
ATTN: Lab
lab@bmpaint.com



B & M Painting Co., Inc.
347 Van Buren
Camden, AR 71701

SAMPLE INFORMATION

Project Description:

Two (2) water sample(s) received on November 12, 2014
Rinse Water
P.O. No. AI111114-SW

Receipt Details:

A Chain of Custody was provided. The samples were delivered in one (1) ice chest.
Ice chest #1 was delivered with shipping documentation.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

<u>Laboratory ID</u>	<u>Client Sample ID</u>	<u>Sampled Date/Time</u>	<u>Notes</u>
184576-1	POTW1 11-11-14 12:00	11-Nov-2014 1200	
184576-2	POTW2 11-11-14 12:00	11-Nov-2014 1200	

Case Narrative:

There were no qualifiers for this data and all samples met quality control criteria.

References:

- "Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).
- "Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.
- "Standard Methods for the Examination of Water and Wastewaters", (SM).
- "American Society for Testing and Materials" (ASTM).
- "Association of Analytical Chemists" (AOAC).



B & M Painting Co., Inc.
347 Van Buren
Camden, AR 71701

ANALYTICAL RESULTS

AIC No. 184576-1

Sample Identification: POTW1 11-11-14 12:00

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Chromium EPA 200.7	0.36 Prep: 12-Nov-2014 1222 by 235 Analyzed: 12-Nov-2014 1418 by 235	0.007	mg/l Batch: S37726	

AIC No. 184576-2

Sample Identification: POTW2 11-11-14 12:00

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Chromium EPA 200.7	0.16 Prep: 12-Nov-2014 1222 by 235 Analyzed: 12-Nov-2014 1421 by 235	0.007	mg/l Batch: S37726	



B & M Painting Co., Inc.
347 Van Buren
Camden, AR 71701

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Chromium	0.5 mg/l	98.4	85.0-115			S37726	12Nov14 1222 by 235	12Nov14 1409 by 235		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Chromium	184576-1	0.5 mg/l	94.4	75.0-125	S37726	12Nov14 1222 by 235	12Nov14 1412 by 235		
	184576-1	0.5 mg/l	96.2	75.0-125	S37726	12Nov14 1222 by 235	12Nov14 1415 by 235		
	Relative Percent Difference:		1.10	20.0	S37726				

LABORATORY BLANK RESULTS

Analyte	Result	RL	PQL	QC Sample	Preparation Date	Analysis Date	Qual
Chromium	< 0.007 mg/l	0.007	0.007	S37726-1	12Nov14 1222 by 235	12Nov14 1407 by 235	

