

Waller, Scott

From: Gilliam, Allen
Sent: Friday, November 30, 2012 2:00 PM
To: Carmela Simmons (csimmons@DEFIANCEMETAL.com)
Cc: hswd@sbcglobal.net; Waller, Scott
Subject: AR0022381_Defiance ARP001047 Nov 2012 semi annual report and ADEQ reply_20121129
Attachments: WW submission Nov 2012.pdf

Carmela,

Your November 2012 semi-annual Pretreatment report was received, reviewed, deemed complete and compliant with the Federal Pretreatment Regulations in 40 CFR 403 and more specifically with the Metal Finishing limitations in 40 CFR 433.

Another caution regarding your chain of custody must be made. It is incomplete as it does not have the sampler's name filled in the form's block. As previously mentioned in an 11/28/11 e-mail a "broken" chain of custody and its resultant analytical data may not be admissible in a court of law. A complete chain of custody is for Defiance Metal's protection.

You also might want to keep a close eye on your zinc levels as the attached report shows zinc at 1.14 mg/l, near the Metal Finishing monthly average not to exceed of 1.48 mg/l. It would be advisable to sample at the very beginning of your reporting month and not wait until the end in case the first sample exceeds that limit.

Sampling/analyzing earlier and finding a non-compliant zinc result, you might still have time to discover what has to be adjusted in your chemical precipitation system and take another sample for zinc during that month hopefully with both results averaging below the 40 CFR 433.17 monthly average limit.

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

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Don Knight, City of Heber Springs General Manager

E-drive/NPDES/NPDES/Pretreatment/Reports

From: Carmela Simmons [<mailto:csimmons@DEFIANCEMETAL.com>]
Sent: Thursday, November 29, 2012 7:33 AM
To: Gilliam, Allen
Subject: November 2012 wastewater submission

Allen-

Attached you will find our semi-annual wastewater submission.

If you have any question please do not hesitate to give me a call.

Thanks and have a wonderful Holiday season.

Carmela Simmons

Project /Safety Engineer

Phone: (501) 887 4756

Fax: (501) 362-2214

email: csimmons@defiancemetal.com



November 28, 2012

Arkansas Department of Environmental Quality
Water Division
5301 North Shore Dr.
North Little Rock, AR 72218-5317

Attn: Mr. Allen Gilliam

Re: Semi Annual Reporting

Dear Mr. Gilliam

Attached you will find our report showing Defiance Metal Products (DMP) waste water effluent testing for the period represented from May 2012 through November 2012. Also attached you will find the laboratory report of analysis with the chain of custody. We are glad to report that all parameters are within specification.

Upon your review if you should find anything which requires our attention please do not hesitate to call. We'll continue to strive to improve our processes and comply with all federal, State and Local regulations.

Respectfully,

A handwritten signature in black ink that reads "Carmela Simmons". The signature is written in a cursive style with a large, looping initial "C".

Carmela Simmons
Safety Engineer
Defiance Metal Products

944 Bypass Rd.
Heber Springs AR 72543
501-362-1919

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

Defiance Metal Products
944 Bypass Road
Heber Springs, AR 72543

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944 Bypass Road
Heber Springs, AR 72543

C. FACILITY CONTACT: Carmela Simmons TELEPHONE NUMBER: 501 887 4756 e-mail:csimmons@defiancemetal.com

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

A. MONTHS WHICH REPORTS ARE DUE

____ May ____ & __ November ____

B. PERIOD COVERED BY THIS REPORT

FROM: May 2012 TO: November 2012

(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 _____

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.

No changes have been made since the last report

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

C. Number of Regular Employees at this Facility

230

D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Regulated (Cyanide)	8000	12000	Batch
' 403.6(e) Unregulated*			
' 403.6(e) Dilute			
Cooling Water			
Sanitary	3800	5000	
Total Flow to POTW	11800	17000	*****

*"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	<.001	.003	.067	<.002	.829	<.003	1.14	.01	
Ave Measured									

Sample Location Clarifier Effluent

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected One sample

40CFR136 Preservation and Analytical Methods Use: Yes No

(6) CERTIFICATION

A. [Reserved]

[Reserved]

B. CHECK ONE: '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED '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.

Raymond Miller
(Typed Name)


(Corporate Officer or authorized representative)

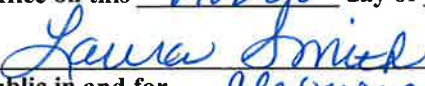
Date of Signature 11/27/12

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS)
COUNTY OF Cleburne)

Before me, the undersigned authority, on this day personally appeared Raymond Miller / DMP
November 28 of 2012,
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 Nov 28 day of 2012, 200


Notary Public in and for Cleburne County
County, Arkansas

My commission expires 1/26/21

(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.

Kevin Schmidt
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Plant Manager
OFFICIAL TITLE


SIGNATURE

11/28/12
DATE SIGNED

Arkansas Testing Laboratories

3301 Langley Drive · Searcy, AR 72143 (501) 268-6431 f(501) 268-9314

NPDES Wastewater Monitoring
 Water and Wastewater Analysis
 Concrete, Asphalt, and Aggregate Testing
 Geotechnical Testing
 Industrial and Construction Quality Control

DEFIANCE METALS

Collection Date: November 20, 2012
 Collection Time: 12:46 PM
 Collected By: Ray Miller

WATER ANALYSIS


Collection Place: EFFLUENT OUTFALL

KLB

Parameter	Analysis Begin Date / Time	Analysis End Date / Time	Results	Unit	Analyst	% Spike	Rel %	Sample Type	Method: <small>Analysis complies with 40 CFR Part 136</small>
Cyanide	11/21 9:00 AM	NA	0.01	mg/l	KLB	94.5	0.00	GRAB	SM 4500 CN-E
Cadmium	11/21 11:05 AM	NA	< 0.001	mg/l	KLB	96.2	1.38	GRAB	SM 3111 B
Chromium	11/21 11:05 AM	NA	0.003	mg/l	KLB	99.9	0.32	GRAB	SM 3111 B
Copper	11/21 11:05 AM	NA	0.067	mg/l	KLB	95.9	2.31	GRAB	SM 3111 B
Lead	11/21 11:05 AM	NA	< 0.002	mg/l	KLB	94.3	0.77	GRAB	SM 3111 B
Nickel	11/21 11:05 AM	NA	0.829	mg/l	KLB	101.9	0.37	GRAB	SM 3111 B
Silver	11/21 11:05 AM	NA	< 0.003	mg/l	KLB	91.2	0.00	GRAB	SM 3111 B
Zinc	11/21 11:05 AM	NA	1.140	mg/l	KLB	109.4	0.47	GRAB	SM 3111 B

Quality Assurance: All Parameters include 10% duplication studies by random selection. The following equipment is checked and calibrated daily: pH meter, balance, incubators, water baths, drying oven and sterilizing apparatus. Ammonia Nitrogen and Oil & Grease Analysis include duplication and spike studies at a rate of at least 10%.

Notes: Samples iced at collection. Preserved with H₂SO₄ to pH₂: Oil & Grease, Ammonia, COD


 Neville Adams, Manager

Arkansas Testing Laboratories

3301 Langley Drive
Searcy, AR 72143
Off 501-268-6431
Fax 501-268-9314

*NPDES Wastewater Monitoring
*Water and Wastewater Analysis
*Concrete, Asphalt, and Aggregate Testing
*Geotechnical Testing
*Industrial and Construction Quality Control

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

CLIENT: <i>Defiance Metal Products</i>				PARAMETERS							
SAMPLE ID	SAMPLE MATRIX	SAMPLED BY:				FECAL COLIFORM		CALIBRATION		PRESERVATIVES	
		DATE	TIME			De-Chlorinated w/Na2S2O3	Preserved w/ice	pH / DO #		HNO3	NaOH
EFF	W	<i>11/20/12</i>	<i>12:56</i>							<i>Ni, Zn, Cd</i>	<i>CN</i>
INF	S=SLUDGE									<i>Cr, Cu, Pb,</i>	
CLAR	D=SOIL									<i>Ag</i>	
POND	C=WELL									<i>1-L-P</i>	<i>1-L-P</i>
BACKWASH											
<i>EFF</i> <i>(waste water)</i>	<i>W</i>	<i>x 11/20/12</i>	<i>x 12:56</i>								

Q, L, H = Quart, Liter, Half Gallon

P, G = Plastic, Glass

Relinquished by: <i>Raymond Wall</i>	Date/Time <i>11/20/12 12:50</i>	Received by: <i>Camdy Simmons</i>	Date/Time <i>11/20/12 12:51pm</i>
Relinquished by: <i>Camdy Simmons</i>	Date/Time <i>11/20/12 4:48 PM</i>	Received by: <i>RH</i>	Date/Time <i>11-20-12 4:48 pm</i>