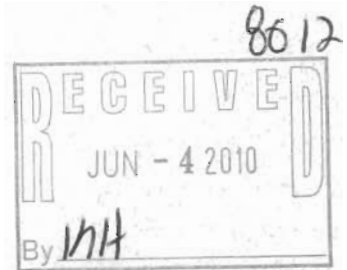




944 BY PASS RD. • HEBER SPRINGS, ARKANSAS 72543
PH. (501) 362-1919 • FAX (501) 362-6160

ARPO01047
12-00214 Allen



complete/compliant.
No further action necessary.
AB
(IA now conducts numerous
12-hour AA analysis for
different metals)

May 26, 2010

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 December 2009 through the May 2010. Also you will find attached a summary of all testing conducted during this time, both in-house and offsite. We are glad to report no out of spec results. Our corrective actions from the previous report period are still in place.

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

Tim Bartley
Facility Chemist
Defiance Metal Products

2010, May SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433

Use of this form is not an EPA/ADEQ requirement.

Attn: Water Div/NPDES Pretreatment

Comment [COMMENT1]:
 A T T E N T I O N ! ! ! ! !
 (1) Specify Fiscal Year in Sect 2
 (2) Place the appropriate limits for the user in section 5.C.
 (3) Update footer (PF3,2) if appropriate.

(1) IDENTIFYING INFORMATION	
<p>A. LEGAL NAME & MAILING ADDRESS</p> <p>Defiance Metal Products 944 By Pass Rd Heber Springs, AR 72543</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p>Same as section A.</p>
<p>C. FACILITY CONTACT: Tim Bartley TELEPHONE NUMBER: 501 362-1919 Ext 5297 e-mail: tbartley@defiancemetal.com</p>	
(2) REPORTING PERIOD--FISCAL YEAR From 2009 to 2010 (Both Semi-Annual Reports must cover Fiscal Year)	
<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p>____ May ____ & ____ November ____</p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p>FROM: Nov. 2009 TO: May 2010</p>
(3) DESCRIPTION OF OPERATION	
<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> G Electroplating <input type="checkbox"/> G Electroless Plating <input type="checkbox"/> G Anodizing <input checked="" type="checkbox"/> X Coating <input type="checkbox"/> G Chemical Etching and Milling <input type="checkbox"/> G Printed Circuit Board Manufacture</p> <p><u>ANCILLARY PROCESS(ES)</u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p>____ Cleaning ____ _____ _____ _____ _____</p> <p><small>SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS</small></p>	<p>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.</p>
<p>C. Number of Regular Employees at this Facility</p> <p>____ 185 ____</p>	<p>D. [Reserved]</p>

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Cyanide)	8,000	12,000	Batch
' 403.6(e) Unregulated'			
' 403.6(e) Dilute'			
Cooling Water			
Sanitary	3,000	4,500	Continuous
Total Flow to POTW	11,000	16,500	*****

'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	<0.005	<0.05	<0.01	<0.05	1.04	<0.01	0.96	<0.01	-----
Ave Measured	-----	-----	-----	-----	1.04	-----	0.58	-----	-----

Sample Location _____ Clarifier_Effluent _____

Sample Type (Grab or Composite) ___ Grab _____

Number of Samples and Frequency Collected ___ Weekly_(for Zinc) _____

40CFR136 Preservation and Analytical Methods Use: Yes No

(6) CERTIFICATION

A. [Reserved]

[Reserved]

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

Devin McSpadden
(Typed Name)


(Corporate Officer or authorized representative)

Date of Signature 5/26/2010

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.]

16602 [42 U.S.C. 13101] Findings and Policy parts (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.

Devin McSpadden
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

Plant Manager
OFFICIAL TITLE

5/26/2010
DATE SIGNED

Defiance Metal Products
Waste Water Effluent Test Results

In-House AA Unit
Effluent Zinc

12/2/2009	0.7296
12/7/2009	0.6200
12/15/2009	0.6904
12/28/2009	0.8197
1/7/2010	0.5137
1/12/2010	0.5141
1/20/2010	0.1957
1/28/2010	0.5161
2/3/2010	0.1937
2/11/2010	0.6079
2/16/2010	0.6846
2/25/2010	0.5148
3/5/2010	0.6950
3/10/2010	0.1959
3/16/2010	0.6264
3/24/2010	0.6988
4/1/2010	0.6171
4/7/2010	0.6246
4/15/2010	0.5174
4/20/2010	0.2039
4/29/2010	0.7649
5/7/2010	0.5265
5/12/2010	0.7663
5/18/2010	0.6252

Arkansas Testing Labs Effluent Zinc

4/29/2010	0.963
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Arkansas Testing Laboratories

3301 Langley Drive · Searcy, AR 72143

(501) 268-6431 / (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: April 29, 2010
Collection Time: 6:30 AM
Collected By: TIM BARTLEY

Collection Place: WASTE WATER

WATER ANALYSIS

KLB

Parameter	Analysis Begin Date / Time	Analysis End Date / Time	Results	Unit	Analyst	% Spike	Rel %	Sample Type	Method:
BOD	04/30 8:00 AM	05/05 9:30 AM	46	mg/l	KLB / KLB	92.3	7.46	GRAB	SM 5210 B
TDS	04/29 3:50 PM	NA	2216	mg/l	KLB	NA	1.44	GRAB	SM 2540 D
COD	04/29 2:00 PM	NA	135	mg/l	KLB	102.5	0.00	GRAB	HACH 8000
Cyanide	05/10 8:15 AM	NA	< 0.01	mg/l	BET	95.3	0.00	GRAB	SM 4500 CN-E
Cadmium	05/17 1:00 PM	NA	< 0.005	mg/l	BET	98.4	1.03	GRAB	SM 3111 B
Chromium	05/17 1:15 PM	NA	< 0.05	mg/l	BET	98.5	3.08	GRAB	SM 3111 B
Copper	05/17 1:30 PM	NA	< 0.01	mg/l	BET	99.5	4.12	GRAB	SM 3111 B
Lead	05/17 1:45 PM	NA	< 0.05	mg/l	BET	93.9	5.46	GRAB	SM 3111 B
Nickel	05/17 2:00 PM	NA	1.040	mg/l	BET	97.7	3.11	GRAB	SM 3111 B
Silver	05/17 2:15 PM	NA	< 0.01	mg/l	BET	96.8	0.00	GRAB	SM 3111 B
Zinc	05/17 2:30 PM	NA	0.963	mg/l	BET	96.9	2.08	GRAB	SM 3111 B

Additional Testing is attached. These results include Volatiles, Semi-Volatiles, Pesticides and Metals

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

