

Wilson, Tabatha

From: Gilliam, Allen
Sent: Tuesday, June 10, 2014 9:15 AM
To: Carmela Simmons (csimmons@DEFIANCEMETAL.com)
Cc: Fuller, Kim; Wilson, Tabatha; hswd@sbcglobal.net
Subject: AR0022381_Defiance Metal ARP001047 June response to May 2014 non-compliant semiannual Pretreatment report with ADEQ reply_20140610
Attachments: May 2014 WW non-compliance letter.pdf

Carmela,

Thank your for the quick response. pH probes are notorious for causing false pumping or chemical additions. It is a good idea to add the preventative maintenance/visual inspection of the pH probe to your weekly check list.

Defiance Metals' corrective action and subsequent analysis indicates it is once again back into compliance with the Metal Finishing standards in 40 CFR 433. No further action is necessary at this time.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Donald Knight – Heber Springs General Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Carmela Simmons [<mailto:csimmons@DEFIANCEMETAL.com>]
Sent: Tuesday, June 10, 2014 8:28 AM
To: Gilliam, Allen
Cc: Fuller, Kim; Wilson, Tabatha; heber springs
Subject: RE: AR0022381_Defiance Metal ARP001047 May 2014 non-compliant semiannual Pretreatment report with ADEQ reply_20140603

Allen-

Again I apologize for overlooking the non-compliance.

We have addressed it and it has been resolved. Please see attached letter and test data.

If you have any further questions please do not hesitate to ask. I will do my best to answer any questions that you may have.

Carmela Simmons

Project /Safety Engineer

Phone: (501) 887 4756

Fax: (501) 362-2214

email: csimmons@defiancemetals.com



June 10, 2014

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

Attn: Mr. Allen Gilliam

Re: May 2014 Semi-annual report non-compliance

Dear Mr. Gilliam

I received your email on June 3rd of the non-compliance of the nickel level in our water sample. After investigation, it was discovered that our pH monitor on our pH adjust tower was failing.

The pH level determines the rates at which zinc and nickel are precipitated out of the system.

This failing monitor was causing the heavy metals (nickel and zinc) to be passed through instead of being precipitated out. We replaced the monitor on June 4th and I am attaching test data from a sample taken on June 5th that reflects the marked improvement of the nickel and zinc levels in our water.

To prevent this from happening in the future we will test the pH level of the adjust tower contents with another pH meter on a weekly basis. We are also adding a monthly visual check of the pH probe itself for damage or buildup that would result in an inaccurate reading.

Respectfully,

A handwritten signature in black ink that reads "Carmela Simmons". The signature is fluid and cursive, with a large loop at the end.

Carmela Simmons
Safety Manager
Defiance Metal Products

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

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: June 6, 2014

Collection Time: 6:34 AM

Collected By: R. Miller

WATER ANALYSIS

KLB

Collection Place: Effluent

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>
Nickel	06/06 4:31 PM	06/06 5:09 PM	0.84	mg/l	AI235	103.0	2.35	GRAB	EPA 200.7
Zinc	06/06 4:31 PM	06/06 5:09 PM	0.58	mg/l	AI235	100.0	2.62	Grab	EPA 200.7

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