

Wilson, Tabatha

From: Gilliam, Allen
Sent: Tuesday, June 03, 2014 10:29 AM
To: Carmela Simmons (csimmons@DEFIANCEMETAL.com)
Cc: Fuller, Kim; Wilson, Tabatha; heber springs
Subject: AR0022381_Defiance Metal ARP001047 May 2014 non compliant semi annual Pretreatment report with ADEQ reply_20140603
Attachments: WW semi-annual may 2014 submission.pdf

Carmela,

Defiance Metal Products' (DMP) May 2014 semi-annual report was electronically received, reviewed and deemed non-compliant with the Federal Pretreatment reporting requirements and the Metal Finishing standards in 40 CFR 433.

Violations:

- 1) DMPs' regulated wastewater analysis for nickel (2.447 mg/l) exceeded the Metal Finishing monthly average standard of 2.38 mg/l. [Regardless of the number of samples taken per month, the monthly average standard shall not be exceeded. DMP is not limited to sampling/analyzing just once/month or once/6 months]; and
- 2) Under 40 CFR 403.12(g)(2), "If sampling performed by [DMP] indicates a violation, [DMP] shall notify [ADEQ] within 24 hours of becoming aware of the violation. [DMP] shall also repeat the sampling and analysis and submit the results of the repeat analysis to [ADEQ] within 30 days after becoming aware of the violation. No records or either report can be located.

Please submit a corrective action plan and the results of re-sampling within thirty (30) days from the date on this correspondence.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Donald Knight, City of Heber Springs General Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Carmela Simmons [<mailto:csimmons@DEFIANCEMETAL.com>]
Sent: Friday, May 23, 2014 11:17 AM
To: Gilliam, Allen
Subject: Wastewater Semi-annual submission

Carmela Simmons
Project /Safety Engineer
Phone: (501) 887 4756

Fax: (501) 362-2214

email: csimmons@defiancemetal.com



May 23, 2014

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 November 2013 through May 2014. 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. As always, we 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, sweeping flourish at the end.

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

Defiance Metal Products
944 Bypass Road
Heber Springs, AR 72543

C. FACILITY CONTACT: **Carmela Simmons** TELEPHONE NUMBER: **501 887 4756** e-mail: **csimmons@defiancemetals.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: November 2013 TO: May 2014

(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 _____

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

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

C. Number of Regular Employees at this Facility

____ 250 ____

D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Ancillary)	8000	12000	Batch
Regulated (Cyanide)			
' 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	<.004	.004	.021	<.02	2.447	.002	.915	<.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: **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.

Raymond Miller
(Typed Name)

Raymond Miller
(Corporate/Officer or authorized representative)

Date of Signature 5/23/2014

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS)
COUNTY OF Greene)

Before me, the undersigned authority, on this day personally appeared Ray Miller of Defiance Metal Products, 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 23 day of May, 2014.

Sheila Overton
Notary Public in and for Greene
County, Arkansas

My commission expires 5/31/15



(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(i)]

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.

Richard Lynch
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Plant Manager
OFFICIAL TITLE


SIGNATURE

5/23/14
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: April 24, 2014
 Collection Time: 6:46 AM
 Collected By: Ray Miller

WATER ANALYSIS

Collection Place: EFFLUENT

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	05/01 2:00 PM	NA	< 0.01	mg/l	KLB	100.8	0.00	GRAB	SM 4500 CN-E
Cadmium	05/01 4:04 PM	NA	< 0.004	mg/l	KLB	90.9	1.10	GRAB	SM 3120 B
Chromium	05/01 4:04 PM	NA	0.004	mg/l	KLB	94.8	0.82	GRAB	SM 3120 B
Copper	05/01 4:04 PM	NA	0.021	mg/l	KLB	92.7	0.08	GRAB	SM 3120 B
Lead	05/01 4:04 PM	NA	< 0.02	mg/l	KLB	94.5	0.95	GRAB	SM 3120 B
Nickel	05/01 4:04 PM	NA	2.447	mg/l	KLB	95.9	0.47	GRAB	SM 3120 B
Zinc	05/01 4:14 PM	NA	0.915	mg/l	KLB	98.20	0.53	Grab	SM 3120 B
Silver	05/01 4:04 PM	NA	0.002	mg/l	KLB	86.1	2.45	Grab	SM 3120 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: DEFIANCE METAL PRODUCTS

PARAMETERS

SAMPLE ID	SAMPLE MATRIX	SAMPLED BY:		DATE	TIME	GRAB	CALIBRATION		PRESERVATIVES	
		Ray Miller	Ray Miller				pH / DO #	HNO3		
EFF	W									
EFF	W	x 4/23/14	x 6:00 A			X				1-L-P
EFF	W			4/24/14	6:41 A					1-L-P

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

P, G = Plastic, Glass

Relinquished by:

Ray Miller

Date/Time

4/24/14 7:21 A

Received by:

[Signature]

Date/Time

4-24-14 7:26

Relinquished by:

Date/Time

Received by:

Date/Time

Arkansas Testing Laboratories

3301 Langley Ave · Searcy, AR 72143
 (501) 268-6431 f(501) 268-9314
 arkatl@sbccglobal.net

NPDES Wastewater Monitoring
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CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

CLIENT: **Defiance Metal Products**

PARAMETERS

N = no of bottles Q, L, H = Qtz, Ltr, Half Gal P, G = Plastic, Glass

SAMPLE MATRIX	SAMPLED BY:	FECAL COLIFORM		CALIBRATION		PRESERVATIVES	
		DATE	TIME	PH / DO #	NAOH	HNO3	

SAMPLE TYPE	DATE	TIME	Grab / Comp	Cyanide		Metals	
				1-H-P	1-L-P		

Effluent	W	4/29/14	6:41A	G															

Comments:

Number of bottles: _____
 Sample on ice: _____

Relinquished by: *Ray Miller* Date/Time: *4/29/14* 7:21A
 Received by: *[Signature]* Date/Time: *4/29/14* 7:21A
 Relinquished by: _____ Date/Time: _____
 Received by: _____ Date/Time: _____