

## Jamie Belcourt (adpce.ad)

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**From:** Jamie Belcourt (adpce.ad)  
**Sent:** Tuesday, June 6, 2023 11:38 AM  
**To:** Toomer, Jonathan (jonathan.toomer@mecinc.com); Adcock, Steve  
**Cc:** Stacie Wassell (adpce.ad); Richard Healey (adpce.ad); Bryan Leamons (adpce.ad); Jason Bolenbaugh (adpce.ad)  
**Subject:** Defiance Metal Products (Pretreatment ID ARP001047) November 1, 2022 - May 31, 2023 Semiannual Pretreatment Report

Mr. Toomer,

Thank you for submitting Defiance Metal Products' (Pretreatment ID ARP001047) November 1, 2022 - May 31, 2023 Semiannual Pretreatment Report. The report was received, reviewed and deemed complete with the reporting requirements in 40 CFR 403.12(e) and the Metal Finishing Standards in 40 CFR §433.17.

In regards to the report that was submitted, zinc was detected in the facility's effluent at 2.413 mg/L on April 11, 2023. According to the Metal Finishing Standards in 40 CFR § 433.17(a), the maximum limit of zinc in effluent for any one (1) day is 2.61 mg/L. The detected level of zinc at the facility was close to exceeding the numerical limit within the regulation.

In addition, 40 CFR § 433.17(a) also states that the monthly average for zinc shall not exceed 1.48 mg/L. However, as mentioned above, zinc was detected in the facility's effluent at 2.413 mg/L. In the event that either of these numerical limits are exceeded, 40 CFR 403.12(g)(2) states that if sampling performed by an Industrial User indicates a violation, the User shall notify the Control Authority within 24 hours of becoming aware of the violation. The User shall also repeat the sampling and analysis and submit the results of the repeat analysis to the Control Authority within 30 days after becoming aware of the violation.

DEQ requests that Defiance Metal resample the facility's effluent and provide those results within 30 days. In addition, please reassess facility processes and/or BMPs to prevent the discharge of excess zinc to the POTW and advise on any changes the facility makes.

If you have any questions or concerns, or if I can be of any assistance, please do not hesitate to reach out.

Regards,

Jamie Belcourt | State Pretreatment Coordinator  
Division of Environmental Quality | Office of Water Quality  
Policy and Administration  
5301 Northshore Drive | North Little Rock, AR 72118  
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**ARKANSAS**  
ENERGY & ENVIRONMENT

# SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 433.17

Use of this form is not an ADEQ requirement, but satisfies the reporting requirements in 40 CFR 403.12(e).

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION and NPDES Pretreatment Tracking # <u>ARP00</u>	
<p><b>A. LEGAL NAME &amp; MAILING ADDRESS</b></p> <p>MEC (Formerly Defiance Metal Products of Ar) 944 Bypass Rd Heber Springs, AR. 72543</p>	<p><b>B. FACILITY &amp; LOCATION ADDRESS</b></p> <p>Same as section A</p> <p>Collection date 4/11/2023</p>
<p><b>C. FACILITY CONTACT:</b> Steve Adcock      <b>TELEPHONE NUMBER:</b> 501-270-0620      <b>steve.adcock@mecinc.com</b></p>	
(2) REPORTING PERIOD--FISCAL YEAR From <u>May</u> to <u>Nov</u> (Both Semi-Annual Reports must cover Fiscal Year)	
<p><b>A. MONTHS WHICH REPORTS ARE DUE</b></p> <p><u>November</u> &amp; <u>May</u></p>	<p><b>B. PERIOD COVERED BY THIS REPORT</b></p> <p>FROM <u>May 2023</u> TO: <u>November 2023</u></p>
(3) DESCRIPTION OF OPERATION	
<p><b>A. REGULATED PROCESSES</b></p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Electroplating  <input checked="" type="checkbox"/> Electroless Plating  <input type="checkbox"/> Anodizing  <input checked="" type="checkbox"/> Coating (conversion)  <input type="checkbox"/> Chemical Etching and Milling  <input type="checkbox"/> Printed Circuit Board Manufacture</p> <p><u>ANCILLARY PROCESS(ES)*</u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p>     	<p><b>B. CHANGES:</b>      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>*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS</p>	
<p><b>C. Number of Regular Employees at this Facility</b> <u>200</u></p>	<p><b>D. [Reserved]</b></p>

**(4) FLOW MEASUREMENT**

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

Process	Average	Maximum	Type of Discharge*
Regulated (Core & Regulated (Cyanide)	5000	6500	Batch/once per day
' 403.6(e) Unregulated'			
' 403.6(c) Dilute			
Cooling Water			
Sanitary			
<b>Total Flow to POTW</b>	<b>5000</b>	<b>6500</b>	

\*If batch discharged please list the period of time of each batch discharge (300 gallons/day; 500 gallons/week, 2,000 gallons/3 months, etc). Do not normalize over that period for the average flow.  
 \*\*"Unregulated" has a precise legal meaning; see 40CFR403.6(c).

**(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.

40 CFR 433.17 Pollutant (ug/l) limits	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 Avg	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	<0.02	<0.02	0.399	<0.02	1.866	<0.02	2.413	<0.02	*
Avg Measured**									

Sample Location Final Discharge Point

Sample Type (Grab\* or Composite) Grab

\*If Grab, list # of grabs over what period of time  
 Number of Samples and Frequency Collected 1 sample

40CFR136 Preservation and Analytical Methods Use:  Yes  No (include complete Chain of Custody)

\*If a TOMP has been submitted and approved by ADEQ place N/A.

\*\*A value here is the average of all samples taken during one (1) calendar month regardless of number of

samples taken. If only one (1) sample is taken it must meet the monthly average limitation.

**(6) CERTIFICATION (ONLY IF A TOMP HAS BEEN SUBMITTED/APPROVED BY ADEQ)**

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.

Jonathan Toomer \_\_\_\_\_  
(Typed/Printed Name)

  
(Corporate Officer or authorized representative signature)

Date of Signature 6/1/2023

**(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 including Best or Environmental Management Practices, Source Reduction, Waste Minimization, Lean Manufacturing, Water and/or Energy Conservaton:


1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

(8) GENERAL COMMENTS

(9) SEMI-ANNUAL/PERIODIC REPORT CERTIFICATION STATEMENT REQUIRED UNDER 40 CFR 403.12(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.

Jonathan Toomer  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

EHS Manager  
OFFICIAL TITLE

6/1/2023  
DATE SIGNED

# Arkansas Testing Laboratories

3301 Langley Drive - Searcy, AR 72143

(501) 268-6431 f(844) 318-7030

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

## MEC INC.

Collection Date: April 11, 2023

Collection Time: 12:00 PM

Collected By: CV

## BI-ANNUAL WATER ANALYSIS

Collection Place: CLARIFIER

RLC

Parameter	Analysis Begin		Analysis End		Results	Unit	Analyst	% Spike	Rel %	Sample Type	Method: Analysis complies with 40 CFR Part 136
	Date / Time		Date / Time								
Flow	4/11	12:00 PM	NA		0.00065	MGD	CV	NA	NA	GRAB	
Cyanide	04/19	11:58 AM	4/19	2:42 PM	< 0.01	mg/l	HR	93.00	3.00	GRAB	SM 4500 CN-E-2011
Cadmium	04/24	2:54 PM	NA		< 0.02	mg/l	KLB	99.9	0.81	GRAB	SM 3120 B-2011
Chromium	04/24	2:54 PM	NA		< 0.02	mg/l	KLB	101.1	4.59	GRAB	SM 3120 B-2011
Copper	04/24	2:54 PM	NA		0.399	mg/l	KLB	99.3	0.23	GRAB	SM 3120 B-2011
Lead	04/24	2:54 PM	NA		< 0.02	mg/l	KLB	98.4	1.12	GRAB	SM 3120 B-2011
Nickel	04/24	2:54 PM	NA		1.866	mg/l	KLB	101.9	0.59	GRAB	SM 3120 B-2011
Zinc	04/24	2:54 PM	NA		2.413	mg/l	KLB	97.7	1.22	GRAB	SM 3120 B-2011
Silver	04/24	2:54 PM	NA		< 0.02	mg/l	KLB	96.3	0.68	GRAB	SM 3120 B-2011

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 fixed at collection. Preserved with H<sub>2</sub>SO<sub>4</sub> for pH; Oil & Grease, Ammonia, COD



Neville Adams, Manager

