

Wilson, Tabatha

From: Gilliam, Allen
Sent: Wednesday, December 04, 2013 12:56 PM
To: Carmela Simmons (csimmons@DEFIANCEMETAL.com)
Cc: Fuller, Kim; Wilson, Tabatha; heber springs
Subject: AR0022381_Defiance Metal Products ARP001047 Dec 2013 semi annual Pretreatment report and ADEQ reply_20131204
Attachments: November 2013 ww semi annual report.pdf

Carmela,

Your November 2013 semi-annual Pretreatment report was received on December 2, 2013, reviewed, deemed complete and compliant with the Federal Pretreatment Reporting Requirements in 40 CFR 403.12(e) and more specifically the Metal Finishing standards in 40 CFR 433.

No further action is deemed necessary at this time although you might consider taking your samples earlier in the month of November (and May) to ensure your semi-annual reports are not excessively late. The Significant Non-Compliance (SNC) criteria in 40 CFR 403.8(f)(2)(viii)(F) is met if a report is over forty-five (45) days late.

Thank you the report remaining in compliance with the Federal Pretreatment Requirements in 40 CFR 403.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

Ec: Don Knight, Heber Springs General Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Carmela Simmons [<mailto:csimmons@DEFIANCEMETAL.com>]
Sent: Monday, December 02, 2013 10:56 AM
To: Gilliam, Allen
Subject: semiannual wastewater submission

Allen-
Attached you will find our semi-annual waste water submission.
If you have any questions please give me a call.

Carmela Simmons
Project /Safety Engineer
Phone: (501) 887 4756
Fax: (501) 362-2214
email: csimmons@defiancemetal.com



December 2, 2013

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 2013 through November 2013. 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, flowing "S" for the last name.

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 2013 TO: November 2013

(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 &	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	.023	<.02	.349	<.001	.746	<.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)

Raymond Miller
(Corporate Officer or authorized representative)

Date of Signature 12/2/2013

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS)
COUNTY OF Greene)

Before me, the undersigned authority, on this day personally appeared Raymond 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 2nd day of December, 2013

Sheila Overton
Notary Public in and for Greene
County, Arkansas

My commission expires May 31, 2015



(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


SIGNATURE

Operations Manager
OFFICIAL TITLE

12/2/2013
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 22, 2013

Collection Time: 10:50 AM

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
Cyanide	11/26 1:00 PM	NA	< 0.01	mg/l	KLB	91.2	0.00	GRAB	SM 4500 CN-E
Cadmium	11/25 5:08 PM	NA	< 0.004	mg/l	KLB	108.3	0.86	GRAB	SM 3111 B
Chromium	11/25 5:08 PM	NA	< 0.004	mg/l	KLB	113.0	0.87	GRAB	SM 3111 B
Copper	11/25 5:08 PM	NA	0.023	mg/l	KLB	106.1	1.85	GRAB	SM 3111 B
Lead	11/25 5:08 PM	NA	< 0.02	mg/l	KLB	111.5	0.81	GRAB	SM 3111 B
Nickel	11/25 5:08 PM	NA	0.349	mg/l	KLB	109.3	0.82	GRAB	SM 3111 B
Zinc	11/25 5:08 PM	NA	0.746	mg/l	KLB	105.4	0.22	GRAB	SM 3111 B
Silver	11/25 5:08 PM	NA	< 0.003	mg/l	KLB	109.0	1.86	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: **DEFIANCE METAL PRODUCTS**

PARAMETERS						
SAMPLE ID	SAMPLE MATRIX	SAMPLED BY: <i>Ray Miller</i>		CALIBRATION	PRESERVATIVES	
		DATE	TIME		pH / DO #	HNO3
EFF	W	x 11/22/13	10:50			MeOH
EFF	W	11/22/13	10:50			CN
						1-L-P
						J-L-P

PARAMETERS	
G. L. H = Quart, Liter, Half Gallon	P, G = Plastic, Glass
Relinquished by: <i>Ray Miller</i>	Date/Time 11/22/13 11:02
Relinquished by: <i>ARMEZA SIMMONS</i>	Date/Time 11/22/13 3:19 PM
Received by: <i>Armeza Simmons</i>	Date/Time 11/22/13 11:02 AM
Received by: <i>[Signature]</i>	Date/Time 11-22-13 3:19 pm