

Henderson, Katie

From: Gilliam, Allen
Sent: Wednesday, June 27, 2012 12:21 PM
To: Carmela Simmons (csimmons@DEFIANCEMETAL.com)
Cc: Fuller, Kim; Henderson, Katie
Subject: AR0022381_Defiance Metal Products ARP001047 May 2012 Semi Annual Pretreatment Report Reply_20120627 AFIN 1200214
Attachments: 0646_001.pdf
Importance: High

Carmela,

Your May 2012 semi-annual Pretreatment Report was received on 6/25/12, reviewed, deemed complete and compliant with the Federal Pretreatment Regulations in 40 CFR 403, more specifically with the Metal Finishing limitations in 40 CFR 433.17.

There is no further action deemed necessary at this time.

Please keep in mind DMP's semi-annual reports are due during the months of May and November.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

From: Carmela Simmons [<mailto:csimmons@DEFIANCEMETAL.com>]
Sent: Monday, June 25, 2012 4:10 PM
To: Gilliam, Allen
Subject: FW: Attached Image
Importance: High

Allen-
Attached you will find our semi-annual report for wastewater.
Again I sincerely apologize for the lateness of the report!



June 25, 2012

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 2011 through May 2012. 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.

I apologize for the lateness of the report and I will make sure that this does not happen in the future. Mr. Raymond Miller is our signatory authority and he is in the hospital unable to sign at this time. I am signing the report for him.

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,

A handwritten signature in blue ink that reads "Carmela Simmons". The signature is written in a cursive style with a large, stylized "S" and a small "6" above it.

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

A. LEGAL NAME & MAILING ADDRESS

Defiance Metal Products
944 Bypass Road
Heber Springs, AR 72543

B. FACILITY & LOCATION ADDRESS

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 2011 **TO:** May 2012

(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
___ 251 ___

D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Regulated (Cyanide)	8000	12000	Batch
' 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	<.005	<.05	.140	<.05	.38	<.01	.620	<.01	
Ave Measured									

Sample Location _____ Clarifier Effluent _____

Sample Type (Grab or Composite) _____ Grab _____

Number of Samples and Frequency Collected _____ One for sample period _____

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)
Carmela Simmons For RAYMOND MILLER
(Corporate Officer or authorized representative)

Date of Signature 6/25/2012

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.]

'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(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.

Raymond Miller
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

 FOR
RAYMOND
MILLER
SIGNATURE

Wastewater Technician
OFFICIAL TITLE

6/25/2012
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: March 23, 2012
Collection Time: 6:00 AM
Collected By: Raymond 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:	Analysis complies with 40 CFR Part 136
BOD	03/23 8:00 AM	03/28 9:30 AM	73	mg/l	KLB / KLB	91.8	9.47	GRAB	SM 5210 B	
pH	03/23 7:50 AM	NA	8.18	S.U.	KLB	NA	0.24	GRAB	SM 9222 D	
TDS	03/27 10:00 AM	NA	2870	mg/l	KLB	NA	12.22	GRAB	SM 2540 D	
OIL & GREASE	03/30 1:00 PM	NA	5	mg/l	MNE	92.9	2.79	GRAB	EPA 1664 A	
COD	04/05 8:30 AM	NA	439	mg/l	KLB	90.9	7.98	GRAB	HACH 8000	
Cyanide	03/23 4:00 PM	NA	< 0.01	mg/l	KLB	108.6	0.00	GRAB	SM 4500 CN-E	
Cadmium	03/23 11:00 AM	NA	< 0.005	mg/l	BET	98.7	2.04	GRAB	SM 3111 B	
Chromium	03/23 11:15 AM	NA	< 0.05	mg/l	BET	100.1	3.05	GRAB	SM 3111 B	
Copper	03/23 11:30 AM	NA	0.140	mg/l	BET	96.4	0.00	GRAB	SM 3111 B	
Lead	03/23 11:45 AM	NA	< 0.05	mg/l	BET	97.4	4.04	GRAB	SM 3111 B	
Nickel	03/23 12:00 PM	NA	0.380	mg/l	BET	97.0	0.00	GRAB	SM 3111 B	
Silver	03/23 12:15 PM	NA	< 0.01	mg/l	BET	96.7	3.14	GRAB	SM 3111 B	
Zinc	03/23 12:45 PM	NA	0.620	mg/l	BET	98.9	0.00	GRAB	SM 3111 B	

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

AL CONTROL 156436

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 pH<2. Oil & Grease, Ammonia, COD


Neville Adams, Manager

Arkansas Testing Laboratories

3301 Langley Drive *NPDES Wastewater Monitoring
 Seary, AR 72143
 Off 501-288-6431
 Fax 501-288-9314

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

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

CLIENT: Deffance Metal Products

SAMPLE ID	SAMPLE MATRIX	SAMPLED BY:	DATE	TIME	GRAB	PARAMETERS	PRESERVATIVES										
							ICE	HCL	ICE	NaOH	ICE	H2SO4	H2SO4	HNO3			
EFF INF	W=H2O	Raymond Miller				159374											
CLAR POND BACKWASH	S=SLUDG D=SOIL C=WELL						Pesticide	VOL	Semi-Vol	CN	BOD TDS	O & G	COD	METALS			
EFF Wastewater	W		3/23/12	8:00	X	1-L-G	2-40ml-G	1-L-G	1-L-P	1-H-P	1-L-G	1-L-P	1-L-P				
# = number of bottles	Q, L, H = Quart, Liter, Half Gallon																
Relinquished by:		Raymond Miller	Date/Time	3/23/12	7:01 AM												
Relinquished by:			Date/Time			Received by:						Date/Time	3-23-12 901a				