

## Peltier, Hannah

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**From:** Gilliam, Allen  
**Sent:** Wednesday, May 29, 2013 1:44 PM  
**To:** csimmons@defiancemetal.com  
**Cc:** Fuller, Kim; Peltier, Hannah; 'heber springs'  
**Subject:** AR0022381\_Defiance Metal Products ARP001047 May 2013 Semi Annual Pretreatment Report and ADEQ reply\_20130529  
**Attachments:** ww submission May 2013.pdf

Carmela,

Defiance Metal's May 2013 Semi-Annual Pretreatment report was electronically received on 5/20/13, reviewed, deemed complete and compliant with the reporting requirements in the Federal Pretreatment Regulations per 40 CFR 403.12(e) and more specifically in compliance with the Metal Finishing limitations in 40 CFR 433.17. There is no further action deemed necessary at this time.

Side notes: The pH has to be taken at the time of sampling as it has, in effect, no holding time. The lab's report of pH is not valid since they measured it over a day later; the Notary Public stamp and his/her signature is only optional if you desire to delete this section and a follow-up hard copy of this report is not necessary as long as the appropriate signatures are legible on the .pdf attachment to an e-message (such as this one).

Thank you for your timely report remaining in compliance with the Federal Pretreatment Regulations.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

cc: Don Knight, City of Heber Springs General Manager

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**From:** Carmela Simmons [<mailto:csimmons@DEFIANCEMETAL.com>]  
**Sent:** Monday, May 20, 2013 3:00 PM  
**To:** Gilliam, Allen  
**Subject:** May 2013 Wastewater submission

Allen-  
Attached you will find our semi-annual wastewater submission.

If you have any question please do not hesitate to give me a call.

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



May 20, 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 November 2012 through May 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, looping initial "C".

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 2012

**TO:** May 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 & Ancillary) | 8000         | 12000        | Batch             |
| Regulated (Cyanide)          |              |              |                   |
| ' 403.6(e) Unregulated*      |              |              |                   |
| ' 403.6(e) Dilute            |              |              |                   |
| Cooling Water                |              |              |                   |
| Sanitary                     | 3800         | 5000         |                   |
| <b>Total Flow to POTW</b>    | <b>11800</b> | <b>17000</b> | *****             |

\*"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    | <.001 | .001 | .032 | .02  | .426 | <.001 | .282 | <.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 5/20/2013

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS )  
COUNTY OF \_\_\_\_\_ )

Before me, the undersigned authority, on this day personally appeared Ray Miller  
May 20 of 2013  
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 20 day of May, 2013.

Laura Smith  
Notary Public in and for Cleburne  
County, Arkansas

My commission expires 1-26-21

**(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.

Kevin Schmidt  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

Plant Manager  
OFFICIAL TITLE

5/20/13  
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 9, 2013

Collection Time: 10:41 AM

Collected By: Ray Miller

## WATER ANALYSIS

Collection Place: EFFLUENT OUTFALL

KLB

| Parameter    | Analysis Begin<br>Date / Time |          | Analysis End<br>Date / Time |         | Results | Unit | Analyst   | %<br>Spike | Rel<br>% | Sample<br>Type | Method:<br><small>Analysis complies with 40 CFR Part 136</small> |
|--------------|-------------------------------|----------|-----------------------------|---------|---------|------|-----------|------------|----------|----------------|--|
| BOD          | 04/10                         | 8:00 AM  | 04/15                       | 8:45 AM | 85.4    | mg/l | KLB / KLB | 95.5       | 4.61     | GRAB           | SM 5210 B  |
| pH           | 04/10                         | 7:50 AM  | NA                          |         | 9.72    | S.U. | KLB       | NA         | 0.00     | GRAB           | SM 9222 D  |
| TDS          | 04/15                         | 11:30 AM | NA                          |         | 2274    | mg/l | KLB       | NA         | 2.64     | GRAB           | SM 2540 D  |
| OIL & GREASE | 04/23                         | 9:00 AM  | NA                          |         | 4       | mg/l | KLB       | 97.5       | 5.90     | GRAB           | EPA 1664 A   |
| COD          | 04/18                         | 7:45 AM  | NA                          |         | 226     | mg/l | KLB       | 99.5       | 0.00     | GRAB           | HACH 8000  |
| Cyanide      | 04/15                         | 8:00 AM  | NA                          |         | < 0.01  | mg/l | KLB       | 92.2       | 0.00     | GRAB           | SM 4500 CN-E   |
| Cadmium      | 04/22                         | 3:17 PM  | NA                          |         | < 0.001 | mg/l | KLB       | 98.2       | 0.72     | GRAB           | SM 3111 B  |
| Chromium     | 04/22                         | 3:17 PM  | NA                          |         | 0.001   | mg/l | KLB       | 104.2      | 0.27     | GRAB           | SM 3111 B  |
| Copper       | 04/22                         | 3:17 PM  | NA                          |         | 0.032   | mg/l | KLB       | 104.3      | 0.16     | GRAB           | SM 3111 B  |
| Lead         | 04/22                         | 3:17 PM  | NA                          |         | 0.02    | mg/l | KLB       | 107.4      | 0.47     | GRAB           | SM 3111 B  |
| Nickel       | 04/22                         | 3:17 PM  | NA                          |         | 0.426   | mg/l | KLB       | 104.4      | 1.62     | GRAB           | SM 3111 B  |
| Zinc         | 04/22                         | 3:17 PM  | NA                          |         | 0.282   | mg/l | KLB       | 107.0      | 0.76     | GRAB           | SM 3111 B  |
| Silver       | 04/22                         | 3:17 PM  | NA                          |         | < 0.001 | mg/l | KLB       | 104.3      | 0.82     | GRAB           | SM 3111 B  |

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

AI CONTROL 166501

**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 H<sub>2</sub>SO<sub>4</sub> to pH<sub>2</sub>: Oil & Grease, Ammonia, COD

  
 Neville Adams, Manager

# Arkansas Testing Laboratories

3301 Langley Drive \*NPDES Wastewater Monitoring  
 Searcy, AR 72143 \*Water and Wastewater Analysis  
 Off 501-268-6431 \*Concrete, Asphalt, and Aggregate Testing  
 Fax 501-268-9314 \*Geotechnical Testing  
 \*Industrial and Construction Quality Control

## CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

|                                 |               |                                     |        |  |      |                             |          |          |       |                           |       |       |        |
|---------------------------------|---------------|-------------------------------------|--------|--|------|-----------------------------|----------|----------|-------|---------------------------|-------|-------|--------|
| CLIENT: Defiance Metal Products |               |                                     |        |  |      | PARAMETERS                  |          |          |       |                           |       |       |        |
| SAMPLE ID                       | SAMPLE MATRIX | SAMPLED BY: R. Miller               |        |  |      | PRESERVATIVES               |          |          |       |                           |       |       |        |
| INF                             | W=H2O         | DATE                                | TIME   |  | GRAB | ICE                         | HCL      | ICE      | NaOH  | ICE                       | H2S04 | H2S04 | HNO3   |
| CLAR                            | S=SLUDG       |                                     |        |  |      | Pesticide                   | VOL      | Semi-Vol | CN    | BOD TDS                   | O & G | COD   | METALS |
| POND                            | D=SOIL        |                                     |        |  |      |                             |          |          |       |                           |       |       |        |
| BACKWASH                        | C=WELL        |                                     |        |  |      |                             |          |          |       |                           |       |       |        |
| Wastewater                      | W             | 4/9/13                              | 10:41A |  | 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 |        |  |      | P, G = Plastic, Glass       |          |          |       |                           |       |       |        |
| Relinquished by: R. Miller      |               | Date/Time: 4/9/13 3:30 PM           |        |  |      | Received by: ARMEZA SIMMONS |          |          |       | Date/Time: 4/9/13 3:30 PM |       |       |        |
| Relinquished by: ARMEZA SIMMONS |               | Date/Time: 4/10/13 7:10             |        |  |      | Received by: L.R.           |          |          |       | Date/Time: 4-10-13 7:10   |       |       |        |