

## Gage, Hannah

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**From:** Gilliam, Allen  
**Sent:** Tuesday, November 29, 2016 9:45 AM  
**To:** 'Susan Hilden'; 'rmiller@defiancemetal.com'  
**Cc:** Gage, Hannah; Yates, Adam; McWilliams, Carrie; Leamons, Bryan; 'hswd@heberspringswater.com'  
**Subject:** AR0022381\_Defiance Metal Products ARP001047 Nov 2016 semi annual Pretreatment report\_20161129  
**Attachments:** DMP Semi Annual Pretreatment water analysis November 2016.pdf

Susan,

Defiance Metal Products' November 2016 semi-annual Pretreatment report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically in compliance with the Metal Finishing Pretreatment standards in 40 CFR 433.17. No further action is deemed warranted at this time.

Thank you for your timely report.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Kent Latch, Heber Springs General Manager

E/NPDES/NPDES/Pretreatment/Reports

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**From:** Susan Hilden [<mailto:shilden@DEFIANCEMETAL.COM>]  
**Sent:** Monday, November 28, 2016 12:29 PM  
**To:** Gilliam, Allen  
**Subject:** DMP Semi Annual Pretreatment water analysis November 2016

Hi Allen,

Please find attached DMP's semi-annual pretreatment water testing for November 2016.

Happy Holidays!

Susan Hilden  
Human Resources Manager  
Defiance Metal Products  
944 Bypass Road  
Heber Springs, AR 72543  
501-362-1919 Main  
501-887-4766 Direct

**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 # ARP00**

<p><b>A. LEGAL NAME &amp; MAILING ADDRESS</b></p> <p>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>
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**C. FACILITY CONTACT: Ray Miller      TELEPHONE NUMBER: 501-250-5464      e-mail: rmiller@defiancemetal.com**

**(2) REPORTING PERIOD--FISCAL YEAR From May to Nov      (Both Semi-Annual Reports must cover Fiscal Year)**

<p><b>A. MONTHS WHICH REPORTS ARE DUE</b></p> <p><u>  May  </u>      &amp;      <u>  November  </u></p>	<p><b>B. PERIOD COVERED BY THIS REPORT</b></p> <p><b>FROM <u>MAY 2016</u>      TO: <u>NOVEMBER 2016</u></b></p>
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**(3) DESCRIPTION OF OPERATION**

<p><b>A. REGULATED PROCESSES</b></p> <p><b><u>CORE PROCESS(ES)</u></b></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><b>G</b> Electroplating <b>G</b> Electroless Plating <b>G</b> Anodizing <b>X</b>Coating (conversion) <b>G</b> Chemical Etching and Milling <b>G</b> Printed Circuit Board Manufacture</p> <p><b><u>ANCILLARY PROCESS(ES)*</u></b></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</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>
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\*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

<p><b>C. Number of Regular Employees at this Facility <u>  220  </u></b></p>	<p><b>D. [Reserved]</b></p>
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**(4) FLOW MEASUREMENT**

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

Process	Average	Maximum	Type of Discharge*
Regulated (Core &	5000	6500	Batch/once per day
Regulated (Cyanide)			
' 403.6(e) Unregulated*			
' 403.6(e) 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(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.

40 CFR 433.17 Pollutant (mg/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	.0004	.02	.027	.05	.470	.01	.355	.01	*
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 4 samples over a 2 hrs

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.

Raymond Miller  
(Typed/Printed Name)

  
(Corporate Officer or authorized representative signature)

Date of Signature 11/28/16

**(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.

Raymond Miller  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

E-Coat Tech  
OFFICIAL TITLE

11/28/16  
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 11, 2016

Collection Time: 6:09 AM

Collected By: R. MILLER

## SEMI-ANNUAL TESTING

Collection Place: SP 1

KLB

Parameter	Analysis Begin Date / Time	Analysis End Date / Time	Results	Unit	Analyst	% Spike	Rel %	Sample Type	Method
Cyanide	11/21 9:30 AM	NA	< 0.01	mg/l	KLB	104.2	0.00	GRAB	SM 4500 CN-E-1999
Cadmium	11/14 1:04 PM	NA	< 0.004	mg/l	KLB	97.0	0.00	GRAB	SM 3120B-1999
Chromium	11/14 1:04 PM	NA	< 0.02	mg/l	KLB	102.3	0.00	GRAB	SM 3120B-1999
Copper	11/14 1:04 PM	NA	0.027	mg/l	KLB	97.0	7.41	GRAB	SM 3120B-1999
Lead	11/14 1:04 PM	NA	< 0.05	mg/l	KLB	97.8	0.00	GRAB	SM 3120B-1999
Silver	11/14 1:04 PM	NA	< 0.01	mg/l	KLB	81.0	0.00	GRAB	SM 3120B-1999
Nickel	11/14 1:04 PM	NA	0.470	mg/l	KLB	101.6	0.86	GRAB	SM 3120B-1999
Zinc	11/14 1:04 PM	NA	0.355	mg/l	KLB	101.2	3.73	GRAB	SM 3120B-1999

**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

: Analysis complies with 40 CFR Part 136

  
Neville Adams, Manager

# Arkansas Testing Laboratories

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

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 TYPE	SAMPLE MATRIX W=H2O S=SLUDGE D=SOIL C=WELL	SAMPLED BY: <i>Ray Miller</i>									# = no of bottles Q, L, H = Qrt, Ltr, Half Gal P, G = Plastic, Glass					
		DATE	TIME	Flow	Grab / Comp.	CALIBRATION					PRESERVATIVES					
						pH / DO #					NaOH		HNO3			
										Cyanide		Metals				
EFF 1/6mo.	W	<i>11/11/16</i>	<i>609A</i>		Grab										1-L-P	1-125-P

Comments:

Number of bottles: *2*  
 Sample on ice: *4*

COLLECT:

Relinquished by: <i>Ray Miller</i>	Date/Time <i>11/11/16</i>	Received by: <i>[Signature]</i>	Date/Time
Relinquished by:	Date/Time	Received by: <i>[Signature]</i>	Date/Time <i>11-11-16 714am</i>