

Peltier, Hannah

From: Gilliam, Allen
Sent: Friday, December 05, 2014 9:23 AM
To: Tom Gerard
Cc: Ray Miller; Richard Lynch; Fuller, Kim; Peltier, Hannah; heber springs
Subject: AR0022381_Defiance Metal Products Nov 2014 Semi Annual Response and signatory authority change form with ADEQ reply
Attachments: DMP November 2014 Semi Annual Report Response.pdf

Tom,

Thank you for the updated November 2014 semi-annual Pretreatment report indicating Defiance is not in violation of the Metal Finishing (40 CFR 433.17) monthly average of 1.48 mg/l with the additional sample taken on 11/18/14. The two samples' average taken in November falls well below the 40 CFR 433.17 monthly standard. Defiance Metal Products is now in compliance with the Pretreatment reporting requirements in 40 CFR 403.12(g)(2) and the Metal Finishing standards.

You may disregard the requirement in part 2) b. of this office's last correspondence dated 12/2/14.

And thank you for the updated signatory authority form.

There is no further action deemed necessary at this time.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Donald Knight, Heber Springs General Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Tom Gerard [<mailto:tgerard@DEFIANCEMETAL.COM>]
Sent: Thursday, December 04, 2014 8:12 AM
To: Gilliam, Allen
Cc: Ray Miller; Richard Lynch; Tom Gerard
Subject: Defiance Metal Products 2014 Semi Annual Response

Allen:

I hope this e-mail finds you doing well. After talking to you yesterday, I completed all documents but dated it for December 4, 2014. I was a day off. I thought yesterday was the 4th? Please find all documents and supporting information for these documents attached. I summarized everything in a cover letter.

If you have any questions, please let me. Thank you for your time and visit the past two days. Happy Holidays!

Tom Gerard
Defiance Metal Products

501.887.4734



December 4, 2014

Allen Gilliam
Arkansas Department of Environmental Quality
State Pretreatment Coordinator
5301 North Shore Drive
North Little Rock, Arkansas 722218-5317

Re: DMP November 2014 Semi-Annual Report Response

Dear Mr. Gilliam:

As a follow-up to your e-mail dated December 2, 2014 regarding Defiance Metal Products November 2014 semi-annual report and reporting requirements to the Metal Finishing standards 40 CFR 433.17 and 40 CFR 403.12 (g)(2). In addition our two telephone conversations on Tuesday, December 2, 2014, and Wednesday, December 03, 2014.

I have attached DMP's responses to all your inquiries and have completed all requirements within the designated time period. Our responses and communication to you has shown that DMP is in compliance with Waste Water Standards. Please review our responses and if there are any questions or comments, please feel free to contact me by telephone or e-mail.

Attachments include the following:

- Re-submission of the Semi-annual Metal Finishing Standard Form 40 CFR 433.17 with Authorized Signature from Authorized Representative form document
- Arkansas Testing Laboratories Water Analysis Results for Nickel and Zinc dated 11/18/2014 form
 - Nickel 0.848
 - Zinc 0.771
- Arkansas Testing Laboratories Chain of Custody / Analysis Request Form dated 11/20/2014
- Arkansas Testing Laboratories E-mail dated 12/2/2014. Informing DMP on the Sampling Results from 11/18/2014.
- DMP Pre-treatment permit new cognizant official (Authorized Representative) Raymond Miller
 - Completed form enclosed.

Thank you in advance for your time and assistance.

Sincerely,

A handwritten signature in black ink that reads "Tom Gerard".

Tom Gerard
Defiance Metal Products
501.270.1300

cc: Ray Miller
Richard Lynch

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 By Pass Road
Heber Springs, Arkansas 72543**

**Defiance Metal Products
944 By Pass Road
Heber Springs, Arkansas 72543**

C. FACILITY CONTACT: Tom Gerard TELEPHONE NUMBER: 501.887.4756 e-mail: tgerard@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 2014 & November 2014

B. PERIOD COVERED BY THIS REPORT

FROM: May 2014 TO: November 2014

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

CHECK EACH APPLICABLE BLOCK

- G** Electroplating
- G** Electroless Plating
- G** Anodizing
- X** Coating
- G** Chemical Etching and Milling
- G** Printed Circuit Board Manufacture

ANCILLARY PROCESS(ES)*

LIST BELOW EACH PROCESS USED IN THE FACILITY

*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 241

D. [Reserved]

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.

Richard Lynch
(Typed Name)

December 4, 2014
(Corporate Officer or authorized representative)

Date of Signature *Richard Lynch*

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 _____.

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core &	8,000	12,000	Batch
Regulated (Cyanide)			
' 403.6(e) Unregulated*			
' 403.6(e) Dilute			
Cooling Water			
Sanitary	3,800	5,000	
Total Flow to POTW	11,800	17,000	*****

*"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					.848		.771		
Ave Measured									

Sample Location Clarifier Element _____.

Sample Type (Grab or Composite) Grab Sample _____.

Number of Samples and Frequency Collected One Sample _____.

40CFR136 Preservation and Analytical Methods Use: Yes No

(6) CERTIFICATION

'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:

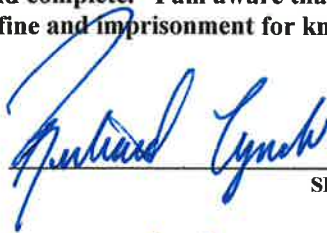
(8) GENERAL COMMENTS

**Attachments: Arkansas Testing Laboratories Water Analysis Report dated November 18, 2014
Arkansas Testing Laboratories Chain of Custody/Analysis Request Form dated November 20, 2014.
Arkansas Testing Laboratories E-mail notification dated December 2, 2014 regarding the November 18, 2014 sample results.**

(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.

Richard Lynch
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

Plant Manager
OFFICIAL TITLE

12/3/2014
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 18, 2014
 Collection Time: 4:02 PM
 Collected By: R. Miller

WATER ANALYSIS


Collection Place: Final Discharge Point

KLB

Parameter	Analysis Begin Date / Time	Analysis End Date / Time	Results	Unit	Analyst	% Spike	Rel %	Sample Type	Method: <small>Analysis complies with 40 CFR Part 136</small>
Nickel	11/24 10:34 AM	NA	0.848	mg/l	KLB	94.1	1.33	GRAB	SM 3120 B
Zinc	11/24 10:34 AM	NA	0.771	mg/l	KLB	87.20	1.26	Grab	SM 3120 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

Tom Gerard

From: Arkansas Testing Laboratories, Inc <arkatl@sbcglobal.net>
Sent: Tuesday, December 02, 2014 7:47 AM
To: Ray Miller
Subject: DEFIANCE METALS - Analysis
Attachments: DEFIANCE 20141118,20.pdf

PDF reports are attached. Make it a great day, kr

M Kathy Rowlett

Office Manager

Arkansas Testing Laboratories

3301 Langley Drive

Searcy, AR 72143

501-268-6431

501-268-9314 fax

Pretreatment Permit
and/or Tracking
Number:


AR0022381/ARP001047

Facility Name: Defiance Metal Products

Type of Change: New Cognizant Official (or duly authorized representative) (sections 1 and 2)
(check one) New Responsible Official (complete section 2 only)
 Both (sections 1 and 2)

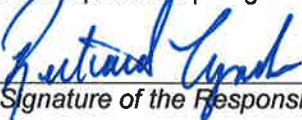
NEW COGNIZANT OFFICIAL (or Duly Authorized Representative) [See 40 CFR 403.12(l)(3)]; the individual, authorized by the ranking official in writing, as **having responsibility for the overall operation** of the regulated facility or activity responsibility, having overall responsibility for environmental matters for the facility or having responsibility for environmental matters pertaining to wastewater discharged to the City and pretreatment.

The ranking official hereby designates the following **individual** as the cognizant official, (duly authorized representative), for signing the Pretreatment required reports, etc., including Periodic Monitoring Reports required by the Federal Pretreatment Regulations, and other information requested by the Director:


Signature of the Cognizant Official (Duly Authorized Representative)
Raymond Miller
Name (First Name, MI, Last Name) Typed or Printed
944 By Pass Road Heber Springs, Arkansas 72543
Mailing Address City, State, and Zip
E-Coat Coordinator/Technician (501) 362.1919 (501)
Title Phone Cell
Email Address: rmiller@defiancemetal.com

By signature below, the responsible official certifies that the above named **individual** is qualified to act as the duly authorized representative under the provisions of 40 CFR 402.12(l)(3).

1. **RESPONSIBLE OFFICIAL** {Note: For a Corporation: it is the responsible corporate officer. For a Partnership or Sole Proprietorship: a general partner or proprietor. [see 40 CFR 403.12(l)(1) or (2)]}


Signature of the Responsible Official December 4, 2014
Date
Richard Lynch
Name (First Name, MI, Last Name) Typed or Printed
944 By Pass Road Heber Springs, Arkansas 72543
Mailing Address City, State, and Zip
Plant Manager (501) 362.1919 501.362.3203
Title A/C Phone Fax
Email Address: rlynch@defiancemetal.com

Certification: I certify under penalty of law that this document and all attachments were prepared under my direct 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.

Will the Responsible Official also be the person signing submittals? Yes No