

**From:** [Jamie Belcourt \(adpce.ad\)](mailto:jamie.belcourt@adeq.state.ar.us)  
**To:** ["jonathan.toomer@mecinc.com"](mailto:jonathan.toomer@mecinc.com)  
**Cc:** ["steve.adcock@mecinc.com"](mailto:steve.adcock@mecinc.com)  
**Subject:** Defiance Metal Products of Arkansas - November 2022 Semiannual Pretreatment Report  
**Date:** Thursday, November 17, 2022 8:38:14 AM  
**Attachments:** [image003.png](#)

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Mr. Toomer,

Defiance Metal Products of Arkansas' (dba Mayville Engineering Company) (Pretreatment ID ARP001047; AFIN 12-00214) semiannual pretreatment report for the May 2022 – November 2022 reporting period was electronically received, reviewed, and 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.

Thank you,

**Jamie Belcourt** | State Pretreatment Coordinator  
**Division of Environmental Quality | Office of Water Quality**  
**Policy and Administration**  
5301 Northshore Drive | North Little Rock, AR 72118  
t: 501.682.0858 | e: [jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)



**ARKANSAS**  
**ENERGY & ENVIRONMENT**

# 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>MEC (Formerly 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> <p>Collection date 10/18/2022</p>
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**C. FACILITY CONTACT:** Steve Adcock      **TELEPHONE NUMBER:** 501-270-0620      **steve.adcock@mecinc.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>FROM <u>May 2022</u> TO: <u>November 2022</u></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><small>*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS</small></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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<p><b>C. Number of Regular Employees at this Facility</b> <u>  221  </u></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 & Ancillary)	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	<0.02	<0.02	0.070	<0.02	0.320	<0.02	0.478	<0.02	*
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  1 sample

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.

Jonathan Toomer  
(Typed/Printed Name)

  
(Corporate Officer or authorized representative signature)

Date of Signature 11/11/2022

**(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.

Jonathan Toomer  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

EHS Manager  
OFFICIAL TITLE

11/11/2022  
DATE SIGNED

# Arkansas Testing Laboratories

3301 Langley Drive - Searcy, AR 72143

(501) 268-6431 f(844) 318-7030

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

## MEC INC.

Collection Date: October 18, 2022  
 Collection Time: 11:00 AM  
 Collected By: CV

## BI-ANNUAL WATER ANALYSIS

Collection Place: CLARIFIER

**KLB**

Parameter	Analysis Begin		Analysis End		Results	Unit	Analyst	% Spike	Rel %	Sample Type	Method:
	Date / Time	Date / Time	Date / Time	Date / Time							
Cyanide	10/25	9:29 AM	NA	NA	< 0.02	mg/l	KLB	95.0	0.00	GRAB	SM 4500 CN-E-2011
Cadmium	10/21	2:54 PM	NA	NA	< 0.02	mg/l	KLB	97.8	1.29	GRAB	SM 3120 B-2011
Chromium	10/21	2:54 PM	NA	NA	< 0.02	mg/l	KLB	97.5	0.47	GRAB	SM 3120 B-2011
Copper	10/21	2:54 PM	NA	NA	0.070	mg/l	KLB	97.6	0.62	GRAB	SM 3120 B-2011
Lead	10/21	2:54 PM	NA	NA	< 0.02	mg/l	KLB	98.1	0.46	GRAB	SM 3120 B-2011
Nickel	10/21	2:54 PM	NA	NA	0.320	mg/l	KLB	96.8	0.83	GRAB	SM 3120 B-2011
Zinc	10/21	2:54 PM	NA	NA	0.478	mg/l	KLB	97.7	0.66	GRAB	SM 3120 B-2011
Silver	10/21	2:54 PM	NA	NA	< 0.02	mg/l	KLB	97.7	1.56	GRAB	SM 3120 B-2011

**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 Ave - Searcy, AR 72143  
 (501) 268-6431 f (844) 318-7030  
 arkatl@sbcglobal.net



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

## CLIENT: Mayville Engineering Company, Inc. CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

SAMPLE TYPE	SAMPLE MATRIX	SAMPLED BY:	DATE	TIME	Flow	Grab / Comp	PH / DO #	PARAMETERS		PRESERVATIVES											
								# = no of bottles	Q, L, H = Qt., Ltr, Half Gal P, G = Plastic, Glass												
EFF/B: Annual	W	Casey Verser	10-18-2022	11:00 AM	4890 AVG	Grab															

Comments:

COLLECT:

Relinquished by:		Date/Time	10-18-2022	Received by:		Date/Time	10-19-22	702
Relinquished by:		Date/Time		Received by:	REFRIGERATOR	Date/Time	10-19-22	750 hrs