



944 BY PASS RD. • HEBER SPRINGS, ARKANSAS 72543  
PH. (501) 362-1919 • FAX (501) 362-6160

November 29, 2010

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 May 2010 through November 2010. We are glad to report no out of spec results.

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 black ink, appearing to read "Tim Bartley", is written over a horizontal line.

Tim Bartley  
Facility Chemist  
Defiance Metal Products

## 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 &amp; MAILING ADDRESS

Defiance Metal Products  
944 Bypass Rd.  
Heber Springs, Ar. 72543

## B. FACILITY &amp; LOCATION ADDRESS

Defiance Metal Products  
944 Bypass Rd.  
Heber Springs, Ar. 72543

C. FACILITY CONTACT: Tim BartleyTELEPHONE NUMBER: 501-362-1919 x 5297(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

November & May

## B. PERIOD COVERED BY THIS REPORT

FROM: May 2010 TO: November 2010

## (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

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## 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.

\*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

C. Number of Regular Employees at this Facility 195

D. [Reserved]

**(4) FLOW MEASUREMENT**

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Anc)	6,000	10,000	Batch
Regulated (Cyanide)			
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary	3,000	5,000	Cont
Total Flow to POTW			*****

\*"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**

Using Corral Chemical  
Products.

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	<0.005	<0.05	<0.01	<0.05	1.250	<0.01	0.626	<0.01	
Ave Measured	—	—	—	—	—	—			

Sample Location Clarifier EffluentSample Type (Grab or Composite) GrabNumber of Samples and Frequency Collected ONE - Semi-Annual40CFR136 Preservation and Analytical Methods Use: ☒ Yes ☐ No**(6) CERTIFICATION**

## A. CYANIDE CERTIFICATION (Applicability Pending)

[Reserved]

B. CHECK ONE: ☐ §433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED ☐ §433.12(a) TTO CERTIFICATION PROVIDED BELOW

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.

Devin McSpadden

(Typed Name)

[Signature]

(Corporate Officer or authorized representative)

Date of Signature 11-29-2010

## 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

§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(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.

Devin McSpadden

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

PLANT MANAGER  
OFFICIAL TITLE

11-29-2010  
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: October 27, 2010  
Collection Time: 11:04 AM  
Collected By: Ray Miller

## WATER ANALYSIS

Collected By: Ray Miller					Collection Place: WASTE WATER					KLB	
Parameter	Analysis Begin		Analysis End		Results	Unit	Analyst	% Spike	Rel %	Sample Type	Method:
	Date / Time		Date / Time								
BOD	10/29	8:00 AM	11/03	9:00 AM	84	mg/l	KLB / KLB	96.5	4.13	GRAB	SM 5210 B
pH	10/28	8:03 AM	NA		7.38	S.U.	KLB	NA	0.14	GRAB	SM 9222 D
TDS	10/28	8:45 AM	NA		2174	mg/l	KLB	NA	0.74	GRAB	SM 2540 D
COD	11/01	11:00 AM	NA		173	mg/l	KLB	100.2	0.00	GRAB	HACH 8000
Cyanide	11/03	4:00 PM	NA		< 0.01	mg/l	BET	93.1	0.00	GRAB	SM 4500 CN-E
Cadmium	11/02	1:00 PM	NA		< 0.005	mg/l	BET	97.4	1.04	GRAB	SM 3111 B
Chromium	11/02	1:15 PM	NA		< 0.05	mg/l	BET	94.4	5.46	GRAB	SM 3111 B
Copper	11/02	1:30 PM	NA		< 0.01	mg/l	BET	99.0	6.25	GRAB	SM 3111 B
Lead	11/02	1:45 PM	NA		< 0.05	mg/l	BET	92.4	0.00	GRAB	SM 3111 B
Nickel	11/02	2:00 PM	NA		1.250	mg/l	BET	100.1	12.21	GRAB	SM 3111 B
Silver	11/02	2:15 PM	NA		< 0.01	mg/l	BET	96.4	2.11	GRAB	SM 3111 B
Zinc	11/02	2:30 PM	NA		0.626	mg/l	BET	96.9	3.14	GRAB	SM 3111 B

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

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<2; Oil & Grease, Ammonia, COD

  
Neville Adams, Manager

- 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

[illegible]