

## **Peltier, Hannah**

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**From:** Gilliam, Allen  
**Sent:** Friday, May 29, 2015 2:48 PM  
**To:** Tom Gerard Defiance Metals  
**Cc:** Peltier, Hannah; heber springs Kent Latch  
**Subject:** AR0022381\_Defiance Metals ARP001047 May 2015 semi-annual Pretreatment report\_20150529  
**Attachments:** doc09354020150529142654.pdf

Tom,

Defiance Metal Product's May 2015 semi-annual Pretreatment report (attached) was received 5/28/15, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically compliant with the Metal Finishing standards in 40 CFR 433.17.

No further actions are deemed necessary 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



May 22, 2015

Allen Gilliam  
Arkansas Department of Environmental Quality  
State Pretreatment Coordinator  
5301 North Shore Drive  
North Little Rock, Arkansas 72218-5317

RECEIVED  
MAY 28 2015  
14601 KB

Re: DMP 2015 Semi-Annual Report for Industrial Users Regulated By 40CFR433

The purpose of this letter and supporting documents is to submit Defiance Metal Products, Heber Springs, Arkansas Semi-Annual Report for Industrial Users for the report period December 2014 to May 2015.

The supporting document are:

- ANPCANFORM # CIU\_SAR\_433 Form – (December 2014 – May 2015)
- Arkansas Testing Laboratories Water Analysis Dated May 16, 2015
- Arkansas Testing Laboratories Water Analysis Dates January 14, 2015, February 4, 2015, May 16, 2015

If you have any questions with our report and or supporting documents, please contact me at the following address, telephone number, or e-mail address.

Tom Gerard  
Environmental/Human Resources/Safety Manager  
Defiance Metal Products  
944 Bypass Road  
Heber Springs, Arkansas 72543  
501.362.1919  
E-mail: [tgerard@defiancemetals.com](mailto:tgerard@defiancemetals.com)

Respectfully,

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

Tom Gerard  
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**

**Defiance Metal Products  
944 Bypass Road  
Heber Springs, Arkansas 72543**

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

**C. FACILITY CONTACT: Tom Gerard TELEPHONE NUMBER: 501.362.1919 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 2015 & November 2015

**B. PERIOD COVERED BY THIS REPORT**

**FROM: December 2014 TO: November 2015**

**(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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\*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 235**

**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)	8,000	12,000	Batch
Regulated (Cyanide)			
' 403.6(e) Unregulated*			
' 403.6(e) Dilute			
Cooling Water			
Sanitary	3,800	5,000	
<b>Total Flow to POTW</b>	<b>11,800</b>	<b>17,000</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	<0.005	<0.02	0.029	<0.02	0.156	<0.01	0.078	<0.01	-
Ave Measured									

Sample Location Clarifier Effluent .

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**

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)

May 22, 2015  
(Corporate Officer or authorized representative)

Date of Signature *Richard Lynch*

**CORPORATE ACKNOWLEDGEMENT (Optional)**

STATE OF ARKANSAS )  
COUNTY OF Faulkner )

Before me, the undersigned authority, on this day personally appeared Richard Lynch of Defiance Metal Products, 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 22 day of May, 2015

Jacqueline Kordsmeier  
Notary Public in and for Faulkner  
County, Arkansas



My commission expires 2-28-2023



**(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**

Please find attached supporting documents regarding Defiance Metal Products waste water grab sampling data. Arkansas Testing Laboratories Water Analysis Dated May 16, 2015, and Arkansas Testing Laboratories Water Analysis Dates (January 29, 2015, February 6, 2015, May 16, 2015)

**(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.

Richard Lynch  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

Plant Manager  
OFFICIAL TITLE

May 22, 2015  
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: May 7, 2015

Collection Time: 1:20 PM

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: Analysis as per the with
Cyanide	05/16 8:00 AM	NA	< 0.01	mg/l	KLB	97.4	0.00	GRAB	SM 4500 CN-E
Cadmium	05/16 12:22 PM	NA	< 0.005	mg/l	KLB	96.0	0.36	GRAB	SM 6010 B
Chromium	05/16 12:22 PM	NA	< 0.02	mg/l	KLB	95.0	1.42	GRAB	SM 6010 B
Copper	05/16 12:22 PM	NA	0.029	mg/l	KLB	93.8	0.34	GRAB	EPA 200.7
Lead	05/16 12:22 PM	NA	< 0.02	mg/l	KLB	98.3	0.29	GRAB	SM 6010 B
Silver	05/16 12:22 PM	NA	< 0.01	mg/l	KLB	96.1	3.54	GRAB	SM 6010 B
Nickel	05/16 12:22 PM	NA	0.156	mg/l	KLB	95.3	0.35	GRAB	EPA 200.7
Zinc	05/16 12:22 PM	NA	0.078	mg/l	KLB	97.5	0.42	GRAB	EPA 200.7

**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(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: <b>Defiance Metal Products</b>										PARAMETERS							
SAMPLE TYPE	SAMPLE MATRIX	SAMPLED BY: <i>Ray Meller</i>								# = no of bottles Q, L, H = Qt, Ltr, Half Gal P, G = Plastic, Glass							
		CALIBRATION				PRESERVATIVES				NaOH		HNO3					
	W=H2O S=SLUDGE D=SOIL C=WELL	DATE	TIME	Flow	Grab/ Comp					pH / DO #				Cyanide		Metals	
	EFF 1/6mo.	W	5/1/15	1:20P	Grab									1-L-P		1-125-P	

Comments:

Number of bottles: \_\_\_\_\_  
 Sample on ice: \_\_\_\_\_

COLLECT:

Relinquished by:	Date/Time	Received by:	Date/Time
<i>Dereasa A. Dycus</i>	5/8/15 / 7:02 AM	<i>[Signature]</i>	5-8-15 7:02a



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 Industrial and Construction Quality Control

## DEFIANCE METALS

Collection Date: May 6, 2015

Collection Time: 12:35 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	05/16 12:17 PM	NA	0.364	mg/l	KLB	95.3	0.35	GRAB	SM 3120 B
Zinc	05/16 12:17 PM	NA	0.289	mg/l	KLB	97.5	0.42	GRAB	SM 3120 B

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 Neville Adams, Manager

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## DEFIANCE METALS

Collection Date: May 7, 2015  
 Collection Time: 9:33 AM  
 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	05/16 12:20 PM	NA	0.370	mg/l	KLB	95.3	0.35	GRAB	SM 3120 B
Zinc	05/16 12:20 PM	NA	0.207	mg/l	KLB	97.5	0.42	GRAB	SM 3120 B

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 Neville Adams, Manager

# Arkansas Testing Laboratories

3301 Langley Drive  
 Searcy, AR 72143  
 Off 501-268-6431  
 Fax 501-268-9314

\*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 ID	SAMPLE MATRIX	SAMPLED BY: <i>Ray Miller</i>				CALIBRATION			PRESERVATIVES	
		DATE	TIME	GRAB	pH / DO #			HNO3		
EFF	W	5/6/15	12:35P	X					Zinc	
INF	W=H2O								<i>NI</i>	
CLAR	S=SLUDGE								1-L-P	
POND	D=SOIL									
BACKWASH	C=WELL									
EFF	W	5/7/15	9:33A	X						
EFF	W									

Q, L, H = Quart, Liter, Half Gallon P, G = Plastic, Glass

Relinquished by:	Date/Time	Received by:	Date/Time
<i>Ceresa L. Dycus</i>	<i>5/8/15 / 4:02 AM</i>	<i>[Signature]</i>	<i>5/8/15 7:02 AM</i>



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## DEFIANCE METALS

Collection Date: May 6, 2015  
 Collection Time: 12:35 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	05/16 12:17 PM	NA	0.364	mg/l	KLB	95.3	0.35	GRAB	SM 3120 B
Zinc	05/16 12:17 PM	NA	0.289	mg/l	KLB	97.5	0.42	GRAB	SM 3120 B

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**Notes:** Samples iced at collection. Preserved with H<sub>2</sub>SO<sub>4</sub> to pH<sub>2</sub>: Oil & Grease, Ammonia, COD

  
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## DEFIANCE METALS

Collection Date: May 7, 2015  
 Collection Time: 9:33 AM  
 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	05/16 12:20 PM	NA	0.370	mg/l	KLB	95.3	0.35	GRAB	SM 3120 B
Zinc	05/16 12:20 PM	NA	0.207	mg/l	KLB	97.5	0.42	GRAB	SM 3120 B

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 Neville Adams, Manager





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## DEFIANCE METALS

Collection Date: February 4, 2015  
 Collection Time: 8:19 AM  
 Collected By: R. Miller

## WATER ANALYSIS

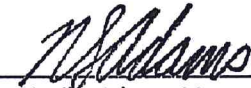
Collection Place: Final Discharge Point

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	02/06 3:41 PM	NA	0.392	mg/l	KLB	99.5	0.63	GRAB	SM 3120 B
Zinc	02/06 3:41 PM	NA	0.085	mg/l	KLB	101.0	0.91	GRAB	SM 3120 B

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**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

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## DEFIANCE METALS

Collection Date: February 5, 2015

Collection Time: 8:03 AM

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	02/06 3:43 PM	NA	0.123	mg/l	KLB	99.5	0.63	GRAB	SM 3120 B
Zinc	02/06 3:43 PM	NA	0.034	mg/l	KLB	101.0	0.91	GRAB	SM 3120 B

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Neville Adams, Manager





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## DEFIANCE METALS

Collection Date: January 14, 2015  
 Collection Time: 3:14 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	01/29 11:51 AM	NA	0.539	mg/l	KLB	94.3	1.89	GRAB	SM 3120 B
Zinc	01/29 11:51 AM	NA	0.420	mg/l	KLB	97.50	2.12	GRAB	SM 3120 B

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 Neville Adams, Manager

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NPDES Wastewater Monitoring  
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 Geotechnical Testing  
 Industrial and Construction Quality Control

## DEFIANCE METALS

Collection Date: January 16, 2015  
 Collection Time: 6:23 AM  
 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	01/29 11:53 AM	NA	0.527	mg/l	KLB	94.3	1.89	GRAB	SM 3120 B
Zinc	01/29 11:53 AM	NA	0.796	mg/l	KLB	97.5	2.12	GRAB	SM 3120 B

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Neville Adams, Manager

