

## Gilliam, Allen

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**From:** Gilliam, Allen  
**Sent:** Wednesday, December 01, 2010 1:33 PM  
**To:** 'btaylor@defiancemetal.com'; Tim Bartley  
**Cc:** Fuller, Kim  
**Subject:** AR0022381\_Defiance Metals (ARP001047) November 2010 Semi-Annual Pretreatment Report Reply\_20101201

Bob,

Your 11/10 semi-annual report was received, reviewed, deemed complete and compliant with the National Pretreatment Regulations in 40 CFR 403 and the Metal Finishing Standard in 40 CFR 433. No further action is required at this time.

One point to bring out: Arkansas Testing Lab's Chain of Custody (C of C) shows the pH was measured on 10/28/10 at 8:03 a.m. The actual sample time on the C of C was shown to be on 10/27/10 at 11:04 a.m. Please be aware, there is effectively no holding time allowed for pH samples. pH must immediately be measured literally at the time of sampling. The pH reported is invalid, but no violation can be assessed.

Tim may be able to provide more information on this issue. You probably have your own pH meter with the proper buffers for periodic calibrations.

Thank you for your timely e-report and cooperation in remaining compliant with the National Pretreatment Program.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625