

AG

ARPD001047



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

6937

May 29, 2009

JUN - 2 2009

Arkansas Department of Environmental Quality
Water Division
5301 North Shore Dr.
North Little Rock, AR 72218-5317

HH
sent letter to B. Taylor
re: non-compliance &
TTO certification
AE

Attn: Mr. Allen Gilliam

Re: Semi Annual Reporting

Dear Mr. Gilliam

Attached you will find results of Defiance Metal Products (DMP) waste water effluent testing for the period represented from the end of November 2008 through May 2009. We are continuing to work with Plymouth Technology to determine how to be able to process water with our influent zinc levels. We'll continue to process our water using chemical precipitation (conventional method) until such time that we can use the MRS.

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 to comply with all Federal, State and Local regulations.

Sincerely,

Bob D. Taylor, Jr.
Safety Leader
Defiance Metal Products

NPDES PERMIT FILE
NPDES # AK00022381
AFIN # _____

Permit PN

Correspondence

Technical Backup

Date Scanned
6/5/09 NA

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

<p>A. LEGAL NAME & MAILING ADDRESS</p> <p align="center">Defiance Metal Products 944 Bypass Rd. Heber Springs, Ar. 72543</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p align="center">Defiance Metal Products 944 Bypass Rd. Heber Springs, Ar. 72543</p>
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C. FACILITY CONTACT: TIM BARTLEY **TELEPHONE NUMBER:** 501-362-1919 EXT 5297

(2) REPORTING PERIOD - FISCAL YEAR From May 1 to Apr 30 (Both Semi-Annual Reports must cover Fiscal Year)

<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p align="center"><u>NOVEMBER</u> & <u>MAY</u></p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p align="center">FROM: <u>NOVEMBER '09</u> TO: <u>MAY '09</u></p>
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(3) DESCRIPTION OF OPERATION

<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Electroplating</p> <p><input type="checkbox"/> Electroless Plating</p> <p><input type="checkbox"/> Anodizing</p> <p><input checked="" type="checkbox"/> Coating</p> <p><input type="checkbox"/> Chemical Etching and Milling</p> <p><input type="checkbox"/> Printed Circuit Board Manufacture</p> <p><u>ANCILLARY PROCESS(ES)*</u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p><u>CLEANING</u></p> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>	<p>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.</p>
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*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

<p>C. Number of Regular Employees at this Facility <u>185</u></p>	<p>D. [Reserved]</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 & Anc)	8,000	12,000	BATCH
Regulated (Cyanide)			
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary	3,000	4,500	CONTINUOUS
Total Flow to POTW	11,000	16,500	*****

*"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 MRS - PROPRIETARY MEDIA
- None

B. COMMENTS ON TREATMENT SYSTEM

PLYMOUTH TECHNOLOGY
METALS REMOVAL SYSTEM
(MRS)

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	0.077	0.033	<0.015	0.283	<0.020	3.463	<0.01	
Ave Measured	—	—	—	—	—	—	1.329		

Sample Location MRS EFFLUENT / CLARIFIER EFFLUENT

Sample Type (Grab or Composite) GRAB

Number of Samples and Frequency Collected BIWEEKLY (FOR ZINC)

40CFR136 Preservation and Analytical Methods Use: Yes No

(6) CERTIFICATION

A. CYANIDE CERTIFICATION (Applicability Pending)

[Reserved]

B. CHECK ONE: §433.11(c) 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 5/28/09

No TAMP on file. AE

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:

Plymouth Technology's Metals Removal System (MRS), while being a greener way to process wastewater has been unable to render results consistent with compliance and is not cost effective as a result. We have moved back to using the chemical precipitation method of treatment exclusively. We will continue to work with Plymouth Technology toward the release of a working media that will consistently yield results within compliance parameters. An atomic absorption spectrometer, Varian model AA240FS has been purchased and in use to provide immediate in-house results from our waste treatment system on a daily basis. The AA was put on-line February 2009. Samples are also now sent to an outside lab on a monthly basis as a check against in-house results.

(8) GENERAL COMMENTS

(9) SIGNATORY REQUIREMENTS [40CFR403.12(f)]

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.

DEVIXI McSpalden

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

[Signature]
SIGNATURE

PLANT MANAGER

OFFICIAL TITLE

5/28/09
DATE SIGNED

Arkansas Testing Laboratories

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

3301 Langley Drive - Searcy, AR 72143 (501) 268-6431 f(501) 268-9314

DEFIANCE METALS

Collection Date: May 19, 2009
Collection Time: 9:10 AM
Collected By: TIM BARTLEY

WATER ANALYSIS

Collection Place: CLARIFIER - EFFLUENT

KLB

Parameter	Analysis Begin Date / Time	Analysis End Date / Time	Results	Unit	Analyst	% Spike	Rel %	Sample Type	Method:
BOD	05/20 9:00 AM	05/25 10:00 AM	20	mg/l	BET	96.3	0.30	GRAB	SM 5210 B
TDS	05/21 2:45 PM	NA	1273	mg/l	KLB	NA	0.16	GRAB	SM 2540 D
COD	05/22 9:00 AM	NA	101	mg/l	KLB	106.0	2.29	GRAB	HACH 8000
Cyanide	05/25 12:00 PM	NA	< 0.01	mg/l	BET	97.1	0.00	GRAB	SM 4500 CN-E

Analysis complies with 40 CFR Part 136

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

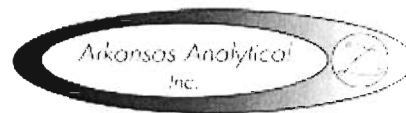
Quality Assurance: All Parameters include 10% duplication studies by random selection. The following equipment is checked and calibrated daily: pH meter, balance, incubators, water baths, drying oven and sterilizing apparatus. Ammonia Nitrogen and Oil & Grease Analysis include duplication and spike studies at a rate of at least 10%.

Notes: Samples iced at collection. Preserved with H₂SO₄ to pH₂; Oil & Grease, Ammonia, COD


Neville Adams, Manager

27 May 2009

Amy Stewart / Neville Adams
Arkansas Testing Laboratories
3301 Langley Dr.
Searcy, AR 72143
Project: Reference # - 1869



Date Received: 20-May-09 14:10

QUALITY CONTROL RESULTS

Total Metals -- Batch: A905268 (Water)

Prepared: 21-May-09 11:10 By: TT -- Analyzed: 23-May-09 13:00 By: RH

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Cadmium	<0.005 mg/L	97.6% / NA	104% / 104%		0.731%	
Chromium	<0.020 mg/L	99.8% / NA	103% / 105%		2.32%	
Copper	<0.005 mg/L	107% / NA	99.9% / 99.9%		0.0358%	
Lead	<0.015 mg/L	95.9% / NA	88.0% / 88.7%		0.858%	
Nickel	<0.010 mg/L	94.7% / NA	86.0% / 86.9%		1.06%	
Silver	<0.020 mg/L	103% / NA	86.5% / 85.3%		1.41%	
Zinc	<0.005 mg/L	87.8% / NA	MBI / MBI		1.29%	MBI

Pesticides -- Batch: A905271 (Water)

Prepared: 21-May-09 13:37 By: WF -- Analyzed: 22-May-09 06:16 By: TB

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
4,4'-DDD	<0.020 ug/L	83.9% / NA	79.0% / 77.0%		2.63%	
4,4'-DDE	<0.020 ug/L	74.9% / NA	55.0% / 50.4%		7.58%	
4,4'-DDT	<0.020 ug/L	84.8% / NA	58.8% / 55.2%		6.49%	
Aldrin	<0.010 ug/L	67.3% / NA	74.2% / 68.4%		7.79%	
alpha-BHC	<0.010 ug/L	73.4% / NA	91.7% / 88.8%		3.22%	
beta-BHC	<0.010 ug/L	102% / NA	54.4% / 48.8%		10.9%	
delta-BHC	<0.010 ug/L	85.3% / NA	65.9% / 60.8%		7.64%	
Dieldrin	<0.020 ug/L	80.1% / NA	70.8% / 66.7%		5.49%	
Endosulfan I	<0.010 ug/L	81.6% / NA	74.6% / 71.4%		4.39%	
Endosulfan II	<0.020 ug/L	98.2% / NA	71.1% / 67.0%		5.93%	
Endosulfan sulfate	<0.020 ug/L	83.4% / NA	51.4% / 45.2%		12.9%	
Endrin	<0.020 ug/L	83.4% / NA	76.7% / 71.8%		6.66%	
Endrin aldehyde	<0.020 ug/L	85.5% / NA	38.5% / 38.5%		0.0114%	
Endrin ketone	<0.020 ug/L	81.1% / NA	46.3% / 43.2%		7.07%	
gamma-BHC (Lindane)	<0.010 ug/L	81.4% / NA	61.5% / 57.8%		6.13%	
Heptachlor	<0.010 ug/L	83.3% / NA	73.5% / 69.0%		6.33%	
Heptachlor epoxide	<0.010 ug/L	81.5% / NA	82.4% / 75.8%		8.26%	
Methoxychlor	<0.100 ug/L	75.0% / NA	46.4% / 41.8%		10.3%	
DCBP [surr]	65.4 %	61.7% / NA	33.4% / 31.4%		NA	
TCMX [surr]	90.1 %	98.9% / NA	70.0% / 73.7%		NA	

27 May 2009

Amy Stewart / Neville Adams
 Arkansas Testing Laboratories
 3301 Langley Dr.
 Searcy, AR 72143
 Project: Reference # - 1869



Date Received: 20-May-09 14:10

QUALITY CONTROL RESULTS

Semivolatiles -- Batch: A905272 (Water)

Prepared: 21-May-09 13:39 By: WF -- Analyzed: 21-May-09 16:50 By: LR

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
1,2,4-Trichlorobenzene	<10.0 ug/L	110% / NA	100% / 103%		3.09%	%D2
1,4-Dichlorobenzene	<10.0 ug/L	98.8% / NA	93.4% / 95.9%		2.59%	%D1
2,4,5-Trichlorophenol	<10.0 ug/L	139% / NA	134% / 123%		8.77%	%D2
2,4,6-Trichlorophenol	<10.0 ug/L	124% / NA	110% / 107%		2.92%	%D1
2,4-Dichlorophenol	<10.0 ug/L	122% / NA	114% / 113%		0.686%	%D1
2,4-Dinitrotoluene	<10.0 ug/L	148% / NA	129% / 120%		6.77%	%D2
2-Chlorophenol	<10.0 ug/L	103% / NA	107% / 108%		0.707%	%D1
4-Chloro-3-methylphenol	<10.0 ug/L	161% / NA	138% / 143%		3.53%	%D2
4-Nitrophenol	<10.0 ug/L	103% / NA	79.4% / 82.3%		3.60%	%D2
Acenaphthene	<10.0 ug/L	128% / NA	108% / 97.4%		10.7%	%D2
N-Nitroso-di-n-propylamine	<10.0 ug/L	138% / NA	135% / 135%		0.359%	%D2
Pentachlorophenol	<10.0 ug/L	147% / NA	139% / 149%		6.96%	%D1
Phenol	<10.0 ug/L	66.4% / NA	69.7% / 67.1%		3.74%	%D2
Pyrene	<10.0 ug/L	159% / NA	137% / 145%		5.35%	%D2
2,4,6-Tribromophenol [surr]	124 %	146% / NA	156% / 143%		NA	%D3
2-Fluorobiphenyl [surr]	91.8 %	113% / NA	129% / 107%		NA	%D3
2-Fluorophenol [surr]	84.9 %	72.6% / NA	76.2% / 75.7%		NA	
Nitrobenzene-d5 [surr]	128 %	132% / NA	114% / 117%		NA	
Phenol-d5 [surr]	63.8 %	55.2% / NA	68.8% / 71.2%		NA	%D3
Terphenyl-d14 [surr]	118 %	135% / NA	112% / 118%		NA	%D3

Volatiles -- Batch: A905273 (Water)

Prepared: 21-May-09 14:22 By: KR -- Analyzed: 22-May-09 12:28 By: KR

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
1,1-Dichloroethene	<5.00 ug/L	88.9% / NA	98.2% / 85.7%		13.6%	
Benzene	<5.00 ug/L	90.1% / NA	98.3% / 90.5%		8.28%	
Chlorobenzene	<5.00 ug/L	98.8% / NA	101% / 101%		0.422%	
Toluene	<5.00 ug/L	89.4% / NA	96.3% / 88.9%		7.99%	
Trichloroethene	<5.00 ug/L	90.2% / NA	101% / 91.9%		8.91%	
4-Bromofluorobenzene [surr]	80.6 %	76.4% / NA	81.7% / 84.8%		NA	
Dibromofluoromethane [surr]	103 %	96.2% / NA	77.5% / 82.1%		NA	
Toluene-d8 [surr]	85.0 %	81.2% / NA	84.4% / 81.6%		NA	

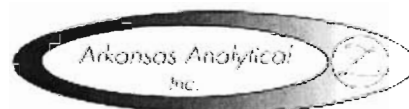
Total Metals -- Batch: A905317 (Water)

Prepared: 26-May-09 10:55 By: TT -- Analyzed: 26-May-09 15:40 By: TT

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Mercury	<0.0002 mg/L	101% / NA	97.6% / 98.8%		1.22%	

27 May 2009

Amy Stewart / Neville Adams
Arkansas Testing Laboratories
3301 Langley Dr.
Searcy, AR 72143
Project: Reference # - 1869



Date Received: 20-May-09 14:10

QUALIFIER(S)

- *%D1: Matrix Spike and/or Matrix Spike Duplicate Percent Recovery Does Not Meet Laboratory Acceptance Criteria
 - *%D2: LCS Percent Recovery Does Not Meet Laboratory Acceptance Criteria
 - *%D3: Surrogate Percent Recovery Does Not Meet Laboratory Acceptance Criteria
 - *E1: Estimated Result Due to Surrogate Failure
 - *E10: Estimated Result; Analyte Did Not Meet Method RSD and/or % D Requirements for Calibration Criteria
 - *E5: Estimated Result Due to Quality Control Failure
 - *MBI: Masked By Interference
-

All Analysis performed according to EPA approved methodology when available:

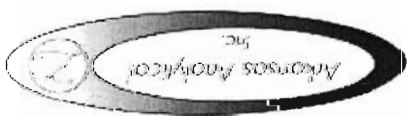
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods, 20th Edition.

Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

A handwritten signature in cursive script that reads "Norma James". The signature is written in black ink and is positioned above a horizontal line.

Reviewed by: _____

Norma James
President



27 May 2009
 Amy Stewart / Neville Adams
 Arkansas Testing Laboratories
 3301 Langley Dr.
 Searcy, AR 72143
 Project: Reference # - 1869
 Date Received: 20-May-09 14:10

Arkansas Testing Laboratories

PO Box 110
 Searcy, AR 72143
 (501) 278-0407
 Fax (501) 203-6374

ISO 17025 Accredited
 EPA Methods 8000, 8130, 8210, 8330, 8453, 8630, 8710, 9000
 Arkansas Testing Laboratories
 1000 West 12th Street
 Searcy, AR 72143

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

CLIENT: ARKANSAS TESTING LAB PO # 2722 REF # 1869

SAMPLE ID	SAMPLE MATRIX	SAMPLED BY	DATE	TIME	PARAMETERS															
					Hg	Lead	Cd	Cu	Pb	As										
INF	W=H2O	KIB																		
CLAR	S=SLUDGE																			
FOUD	D=SOIL																			
BACKWASH	C=WELL																			
090807	W	5-19-09	9:24																	
No metal ions sampled by Tabor 5/22/09. Arsenic or at least Volatile																				
pumping																				
Received @ 4:07																				

of bottles: Q.L.H = Quart Liter, Half Gallon P.G = Plastic Glass

Date: 5/19/09 Date Time: 9:24

Signature: [Handwritten Signature]



11701 I-30 Bldg 1, Ste 115 - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

27 May 2009

Amy Stewart / Neville Adams
Arkansas Testing Laboratories
3301 Langley Dr.
Searcy, AR 72143

RE: Reference # - 1869
SDG Number: 0905244

Enclosed are the results of analyses for samples received by the laboratory on 20-May-09 14:10. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

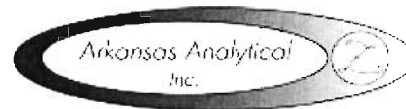
A handwritten signature in cursive script that reads "Norma James".

Norma James
President

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27 May 2009

Amy Stewart / Neville Adams
Arkansas Testing Laboratories
3301 Langley Dr.
Searcy, AR 72143
Project: Reference # - 1869



Date Received: 20-May-09 14:10

CASE NARRATIVE

Sample Delivery Group 0905244-01

On 5/20/09, one water sample was received by Arkansas Analytical for various analyses. Quality control excursions are discussed below.

PESTICIDES:

The first surrogate, TCMX, was qualified by "MBI" on the final report which means "Masked by Interference." The front part of the analytical run contained large, overrange peaks which interfered with the integration of the surrogate. The interference did not affect the elution of the target analytes; therefore, no target analytes were flagged.

SEMIVOLATILES:

Several analytes did not meet lab acceptance criteria in the Laboratory Control Spike (LCS). Due to sample holding time issues, the LCS and sample could not be re-extracted and re-analyzed. All analytes in the sample which failed in the LCS were qualified by "E5" which means "estimated result due to quality control failure." All target analytes were non-detect in the sample. In the Quality Control Section of the final report, analytes which did not meet acceptance criteria in the LCS were flagged by "%D2;" analytes which did not meet acceptance criteria in the Matrix Spike and/or Matrix Spike Duplicate were flagged by "%D1."

Also the percent recoveries for surrogates 2,4,6-tribromophenol, phenol-d5, and terphenyl-d14 did not meet lab acceptance criteria. The percent recoveries were flagged by "%D3" on the final report and all compounds associated with the failed surrogates were flagged by "E1."

VOLATILES:

The compound Iodomethane was qualified by "E10" on the final report due to a CCV failure.

27 May 2009

Amy Stewart / Neville Adams
Arkansas Testing Laboratories
3301 Langley Dr.
Searcy, AR 72143
Project: Reference # - 1869



Date Received: 20-May-09 14:10

ANALYTICAL RESULTS

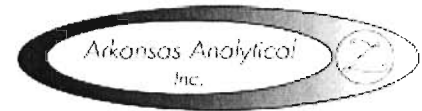
Lab Number: 0905244-01
Sample Name: Clarifier Effluent
Date/Time Collected: 5/19/09 9:10
Sample Matrix: Water

<u>Pesticides</u>	<u>Units</u>	<u>Result</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
4,4'-DDD	ug/L	< 0.020	5/22/09 6:59	A905271	8081A
4,4'-DDE	ug/L	< 0.020	5/22/09 6:59	A905271	8081A
alpha-BHC	ug/L	< 0.010	5/22/09 6:59	A905271	8081A
beta-BHC	ug/L	< 0.010	5/22/09 6:59	A905271	8081A
Chlorpyrifos	ug/L	< 0.050	5/22/09 6:59	A905271	8081A
delta-BHC	ug/L	< 0.010	5/22/09 6:59	A905271	8081A
Chlordane	ug/L	< 0.100	5/22/09 6:59	A905271	8081A
Endosulfan I	ug/L	< 0.010	5/22/09 6:59	A905271	8081A
Endosulfan II	ug/L	< 0.020	5/22/09 6:59	A905271	8081A
Endosulfan sulfate	ug/L	< 0.020	5/22/09 6:59	A905271	8081A
Endrin ketone	ug/L	< 0.020	5/22/09 6:59	A905271	8081A
Heptachlor epoxide	ug/L	< 0.010	5/22/09 6:59	A905271	8081A
Methoxychlor	ug/L	< 0.100	5/22/09 6:59	A905271	8081A
4,4'-DDT	ug/L	< 0.020	5/22/09 6:59	A905271	8081A
Aldrin	ug/L	< 0.010	5/22/09 6:59	A905271	8081A
Dieldrin	ug/L	< 0.020	5/22/09 6:59	A905271	8081A
Endrin	ug/L	< 0.020	5/22/09 6:59	A905271	8081A
gamma-BHC (Lindane)	ug/L	< 0.010	5/22/09 6:59	A905271	8081A
Heptachlor	ug/L	< 0.010	5/22/09 6:59	A905271	8081A
Toxaphene	ug/L	< 0.100	5/22/09 6:59	A905271	8081A
TCMX [surr]	%	MBI	5/22/09 6:59	A905271	8081A
DCBP [surr]	%	19.5	5/22/09 6:59	A905271	8081A

<u>Semivolatiles</u>	<u>Units</u>	<u>Result</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
1,2,4-Trichlorobenzene	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
1,2-Dichlorobenzene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
1,3-Dichlorobenzene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
1,4-Dichlorobenzene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
2,4,5-Trichlorophenol	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
2,4,6-Trichlorophenol	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
2,4-Dichlorophenol	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
2,4-Dimethylphenol	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
2,4-Dinitrophenol	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
2,4-Dinitrotoluene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
2,6-Dinitrotoluene	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
2-Chloronaphthalene	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
2-Chlorophenol	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
2-Methylnaphthalene	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
2-Methylphenol	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
2-Nitroaniline	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
2-Nitrophenol	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
3 & 4-Methylphenol	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
3,3-Dichlorobenzidine	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D

27 May 2009

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Searcy, AR 72143
Project: Reference # - 1869



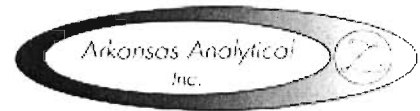
Date Received: 20-May-09 14:10

ANALYTICAL RESULTS

Lab Number: 0905244-01
Sample Name: Clarifier Effluent
Date/Time Collected: 5/19/09 9:10
Sample Matrix: Water

<u>Semivolatiles</u>	<u>Units</u>	<u>Result</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
3-Nitroaniline	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
4,6-Dinitro-2-methylphenol	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
4-Bromophenyl-phenylether	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
4-Chloro-3-methylphenol	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
4-Chloroaniline	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
4-Chlorophenyl-phenylether	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
4-Nitroaniline	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
4-Nitrophenol	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Acenaphthene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Acenaphthylene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Aniline	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Anthracene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Azobenzene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Benzidine	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Benzo (a) anthracene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Benzo[a]pyrene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Benzo[b]fluoranthene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Benzo[g,h,i]perylene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Benzo[k]fluoranthene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Benzoic acid	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
Benzyl alcohol	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Bis(2-chloroethoxy)methane	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
Bis(2-chloroethyl)ether	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Bis(2-chloroisopropyl)ether	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Bis(2-ethylhexyl)phthalate	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Butylbenzylphthalate	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Carbazole	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Chrysene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Dibenz[a,h]anthracene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Dibenzofuran	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Diethylphthalate	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Dimethylphthalate	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Di-n-butylphthalate	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Di-n-octylphthalate	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Diphenylamine	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Fluoranthene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Fluorene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Hexachlorobenzene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Hexachlorobutadiene	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
Hexachlorocyclopentadiene	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
Hexachloroethane	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Indeno[1,2,3-cd]pyrene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Isophorone	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D

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 Searcy, AR 72143
 Project: Reference # - 1869

Date Received: 20-May-09 14:10

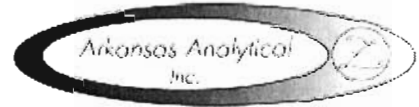
ANALYTICAL RESULTS

Lab Number: 0905244-01
Sample Name: Clarifier Effluent
Date/Time Collected: 5/19/09 9:10
Sample Matrix: Water

<u>Semivolatiles</u>	<u>Units</u>	<u>Result</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Naphthalene	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
Nitrobenzene	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
N-Nitrosodimethylamine	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
N-Nitroso-di-n-propylamine	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
N-Nitrosodiphenylamine	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Pentachlorophenol	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Phenanthrene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Phenol	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Pyrene	ug/L	< 10.0 *E1, E5	5/21/09 17:34	A905272	8270D
Pyridine	ug/L	< 10.0 *E5	5/21/09 17:34	A905272	8270D
2,4,6-Tribromophenol [surr]	%	140 *%D3	5/21/09 17:34	A905272	8270D
2-Fluorobiphenyl [surr]	%	103	5/21/09 17:34	A905272	8270D
2-Fluorophenol [surr]	%	77.3	5/21/09 17:34	A905272	8270D
Nitrobenzene-d5 [surr]	%	119	5/21/09 17:34	A905272	8270D
Phenol-d5 [surr]	%	58.8 *%D3	5/21/09 17:34	A905272	8270D
Terphenyl-d14 [surr]	%	123 *%D3	5/21/09 17:34	A905272	8270D
<u>Total Metals</u>	<u>Units</u>	<u>Result</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Cadmium	mg/L	< 0.005	5/23/09 13:23	A905268	200.7
Chromium	mg/L	0.077	5/23/09 13:22	A905268	200.7
Copper	mg/L	0.033	5/26/09 9:56	A905268	200.7
Lead	mg/L	< 0.015	5/23/09 13:23	A905268	200.7
Mercury	mg/L	< 0.0002	5/26/09 15:40	A905317	245.17470A
Nickel	mg/L	0.283	5/23/09 13:22	A905268	200.7
Silver	mg/L	< 0.020	5/23/09 13:21	A905268	200.7
Zinc	mg/L	0.4	5/23/09 13:22	A905268	200.7
<u>Volatiles</u>	<u>Units</u>	<u>Result</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
1,1,1,2-Tetrachloroethane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,1,1-Trichloroethane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,1,2,2-Tetrachloroethane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,1,2-Trichloroethane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,1-Dichloroethane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,1-Dichloroethene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,1-Dichloropropene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,2,3-Trichlorobenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,2,3-Trichloropropane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,2,4- Trimethylbenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,2,4-Trichlorobenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,2-Dibromo-3-chloropropane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,2-Dibromoethane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,2-Dichlorobenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,2-Dichloroethane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B

27 May 2009

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Arkansas Testing Laboratories
3301 Langley Dr.
Searcy, AR 72143
Project: Reference # - 1869



Date Received: 20-May-09 14:10

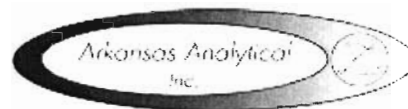
ANALYTICAL RESULTS

Lab Number: 0905244-01
Sample Name: Clarifier Effluent
Date/Time Collected: 5/19/09 9:10
Sample Matrix: Water

<u>Volatiles</u>	<u>Units</u>	<u>Result</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
1,2-Dichloropropane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,2-Dimethylbenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,3,5- Trimethylbenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,3-Dichlorobenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,3-Dichloropropane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,3-Dimethylbenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,4-Dichlorobenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
1,4-Dimethylbenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
2,2-Dichloropropane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
2-Butanone	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
2-Chloroethyl Vinyl Ether	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
2-Chlorotoluene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
2-Hexanone	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
4-Chlorotoluene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
4-Methyl-2-pentanone	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
Acetone	ug/L	104	5/21/09 18:00	A905273	8260B
Acrolein	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
Acrylonitrile	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
Benzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Bromobenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Bromochloromethane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Bromodichloromethane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Bromoform	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Bromomethane	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
Carbon disulfide	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
Carbon Tetrachloride	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Chlorobenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Chlorodibromomethane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Chloroethane	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
Chloroform	ug/L	5.06	5/21/09 18:00	A905273	8260B
Chloromethane	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
cis-1,2-Dichloroethene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
cis-1,3-Dichloropropene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Dibromomethane	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Dichlorodifluoromethane	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
Ethylbenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Hexachlorobutadiene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Iodomethane	ug/L	< 50.0 *E10	5/21/09 18:00	A905273	8260B
Isopropylbenzene	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
Methylene Chloride	ug/L	< 20.0	5/21/09 18:00	A905273	8260B
Methyl-tert-Butyl Ether	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Naphthalene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
n-Butylbenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B

27 May 2009

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Searcy, AR 72143
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Date Received: 20-May-09 14:10

ANALYTICAL RESULTS

Lab Number: 0905244-01
Sample Name: Clarifier Effluent
Date/Time Collected: 5/19/09 9:10
Sample Matrix: Water

<u>Volatiles</u>	<u>Units</u>	<u>Result</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
n-Propylbenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
p-Isopropyltoluene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
sec-Butylbenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Styrene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
tert-Butylbenzene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Tetrachloroethene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Toluene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
trans-1,2-Dichloroethene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
trans-1,3-Dichloropropene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Trichloroethene	ug/L	< 5.00	5/21/09 18:00	A905273	8260B
Trichlorofluoromethane	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
Vinyl acetate	ug/L	< 50.0	5/21/09 18:00	A905273	8260B
Vinyl chloride	ug/L	6.21	5/21/09 18:00	A905273	8260B
4-Bromofluorobenzene [surr]	%	85.8	5/21/09 18:00	A905273	8260B
Dibromofluoromethane [surr]	%	91.0	5/21/09 18:00	A905273	8260B
Toluene-d8 [surr]	%	97.2	5/21/09 18:00	A905273	8260B