

Wilson, Tabatha

From: Torrence, Rufus
Sent: Monday, July 15, 2013 9:02 AM
To: Wilson, Tabatha
Subject: FW: ARP000021 AR0034347 AFIN 27-00004 July 2013 Semi-Annual Pretreatment Report
Attachments: PPS_CAS.WPC.doc; AFIN 27-00004 ARP000021 Kohler Site Visit for Compliance Assurance: Inspection; Kohler July 2013 Semi-Annual Pret Report.pdf
Follow Up Flag: Follow up
Flag Status: Flagged



July 12, 2013

James House
Kohler Company
P O Box 427
415 South Oklahoma Street
Sheridan, AR 82150

Re: KLR's July 2013 Semi-Annual Pretreatment Report
(Permit No. AR0034347 AFIN 27-00004)

Dear Mr. House:

The Department has reviewed Kohler's July 2013 Semi-annual Pretreatment Report and the report is inconclusive.

For the past two decades the Department has given Kohler the option to submit a TOMP (see attached inspection report) in lieu of testing for TTOs. However, over the years Kohler has elected to continue to test for toxic organics in the wastewater discharged to the POTW. The Department's understanding is that Kohler intends to document that TTOs are not entering the POTW. Kohler reported 0.00 mg/l for TTOs. The attached Arkansas Analytical lab report #1306154-01 does not confirm that Kohler is not discharging "reportable" TTOs.

When a parameter is listed as “non-detect”, the Department policy is to use the non-detect value or at least half of the non-detect value to determine compliance. According to 40 CFR 433.11(e), “*The term ‘TTO’ shall mean total toxic organics, which is the summation of all quantifiable¹ values greater than .01 milligrams per liter...*”. Therefore, any parameter listed as non-detect greater than 10 µg/l can be used in the TTO summation. In reference to Arkansas Analytical lab report #1306154-01, summing all the TTO parameters shown as non-detect greater than or equal to 20 µg/l and using half of the non-detect value, the Department calculated a discharge concentration of 0.355 mg/l. However, summing all the TTO parameters shown as non-detect greater than 10 µg/l and using the non-detect value, the Department calculated a discharge concentration of 0.710 mg/l. The Department reserves the right to use the higher value to determine compliance.

Finally, Kohler’s contract lab must use methods listed in 40 CFR 136 (preferably, with method detection levels² below 10 µg/l¹) to test for the TTOs. Note that Arkansas Analytical used EPA Method 624 to test for Dichlorodifluoromethane (see page 6 of 11). As of July 9, 2013 Method 624 is not listed in the 40 CFR 136 for Dichlorodifluoromethane. But most important Dichlorodifluoromethane (CAS #75-71-8) is not a 40 CFR 433.11(e) regulated parameter. Since the toxic organics have many synonyms but only one CAS (Chemical Abstract System) number, the Department has attached a list of CAS numbers for Kohler’s convenience.

The Department will require Kohler either to (1) use only 40 CFR 136 lab methods and sum all “non-detect” and “detected” values greater than 10 µg/l for all parameters or (2) develop an approvable TOMP. Note that if Kohler develops a TOMP and continues testing for TTOs, Kohler must submit all the test results to ADEQ for review.

The Department appreciates Kohler’s continued efforts in semi-annual reporting.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us .

Sincerely,



Rufus Torrence, Pretreatment Engineer
Water Division

¹ If a 40 CFR 136 method with a method detection limit/level below 0.01 milligrams/liter is not available for a parameter, Kohler may exclude that parameter on the basis that it is not “quantifiable” below 10 µg/l. ADEQ must concur.

²Method Detection Limit is defined in Appendix B to Part 136. The lab usually reports the “Method Detection Level” achieved based on the procedure in Appendix B. Kohler’s contract lab may check with ADEQ water lab director for Part 136 methods with quantifiable levels below 10 µg/l.

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5001 NORTH SHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118 5317 / TELEPHONE 501-785-7200
www.adeq.state.ar.us

TABLE II

40CFR122 APP D / CHEMICAL ABSTRACT SYSTEM

PPS-CAS.wpc

50-29-3 4,4'-DDT	107-06-2 1,2-Dichloroethane
50-32-8 Benzo(a)Pyrene	107-13-1 Acrylonitrile
51-28-5 2,4-Dinitrophenol	108-60-1 Bis(2-Chloroisopropyl)Ether
53-70-3 Dibenzo(a,h)Anthracene	108-88-3 Toluene
56-23-5 Carbon Tetrachloride	108-90-7 Chlorobenzene
56-55-3 Benzo(a)Anthracene	108-95-2 Phenol
57-74-9 Chlordane	110-75-8 2-Chloroethylvinylether
58-89-9 Gamma-BHC	111-44-4 bis (2-Chloroethyl) Ether
59-50-7 4-Chloro-3-Methylphenol	111-91-1 bis (2-Chloroethoxy) Methane
60-57-1 Dieldrin	115-29-7 Alpha-Endosulfan
62-75-9 N-Nitrosodimethylamine	115-29-7 Beta-Endosulfan
67-66-3 Chloroform	117-81-7 bis(2-Ethylhexyl)Phthalate
67-72-1 Hexachloroethane	117-84-0 Di-n-Octyl Phthalate
71-43-2 Benzene	118-74-1 Hexachlorobenzene
71-55-6 1,1,1-Trichloroethane	120-12-7 Anthracene
72-20-8 Endrin	120-82-1 1,2,4-Trichlorobenzene
72-54-8 4,4'-DDD	120-83-2 2,4-Dichlorophenol
72-55-9 4,4'-DDE	121-14-2 2,4-Dinitrotoluene
74-83-9 methyl bromide	122-66-7 1,2-diphenylhydrazine
74-87-3 methyl chloride	124-48-1 Dibromochloromethane
75-00-3 Chloroethane	127-18-4 Tetrachloroethene
75-01-4 Vinyl Chloride	129-00-0 Pyrene
75-09-2 Methylene Chloride	131-11-3 Dimethyl Phthalate
75-25-2 Bromoform	156-60-5 Trans-1,2-Dichloroethene
75-27-4 Bromodichloromethane	191-24-2 Benzo(g,h,i)Perylene
75-34-3 1,1-Dichloroethane	193-39-5 Indeno(1,2,3-cd)Pyrene
75-35-4 1,1-dichloroethylene	205-99-2 3,4-benzofluoranthene
76-44-8 Heptachlor	206-44-0 Fluoranthene
77-47-4 Hexachlorocyclopentadiene	207-08-9 Benzo(k)Fluoranthene
78-59-1 Isophorone	208-96-8 Acenaphthylene
78-87-5 1,2-Dichloropropane	218-01-9 Chrysene
79-00-5 1,1,2-Trichloroethane	309-00-2 Aldrin
79-01-6 Trichloroethene	319-84-6 Alpha-BHC
79-34-5 1,1,2,2-Tetrachloroethane	319-85-7 Beta-BHC
83-32-9 Acenaphthene	319-86-8 Delta-BHC
84-66-2 diethyl phthalate	534-52-1 4,6-Dinitro-2-Methylphenol
84-74-2 Di-n-Butylphthalate	541-73-1 1,3 Dichlorobenzene
85-01-8 Phenanthrene	542-75-6 1,3-dichloropropylene
85-68-7 Butylbenzylphthalate	606-20-2 2,6-Dinitrotoluene
86-30-6 N-Nitrosodiphenylamine (1)	621-64-7 N-Nitroso-Di-n-Propylamine
86-73-7 Fluorene	1024-57-3 Heptachlor Epoxide
87-68-3 Hexachlorobutadiene	1031-07-8 Endosulfan Sulfate
87-86-5 Pentachlorophenol	7005-72-3 4-Chlorophenol-phenylether
88-06-2 2,4,6-Trichlorophenol	7421-93-4 Endrin Aldehyde
88-75-5 2-Nitrophenol	8001-35-2 Toxaphene
91-20-3 Naphthalene	11096-82-5 Aroclor-1260
91-58-7 2-Chloronaphthalene	11097-69-1 Aroclor-1254
91-94-1 3,3'-Dichlorobenzidine	11104-28-2 Aroclor-1221
92-87-5 Benzidine	11141-16-5 Aroclor-1232
95-50-1 1,2-Dichlorobenzene	12672-29-6 Aroclor-1248
95-57-8 2-Chlorophenol	12674-11-2 Aroclor-1016
98-95-3 Nitrobenzene	39638-32-9 bis(2- c'i'propyl)ether
100-02-7 4-Nitrophenol	53469-21-9 Aroclor-1242
100-41-4 Ethylbenzene	
101-55-3 4-Bromophynyl-Phenylether	
105-67-9 2,4-Dimethylphenol	
106-46-7 1,4-Dichlorobenzene	
107-02-8 Acrolein	

Wilson, Tabatha

From: Torrence, Rufus
Sent: Friday, September 30, 2011 9:08 AM
To: 'House James'
Subject: AFIN 27-00004 ARP000021 Kohler Site Visit for Compliance Assurance: Inspection
Attachments: KLR Insp 20110921.doc; Kohler Lab Results.xls

ADEQ

ARKANSAS
Department of Environmental Quality

September 30, 2011

James House
Kohler, Inc
415 South Oklahoma St
Sheridan, AR 72150

Re: September 21, 2011 Site Visit for Compliance Assurance: Inspection
(Tracking No. ARP000021 AFIN 27-00004)

Dear Mr. House:

Part of ADEQ responsibility to EPA is to ensure that inspections of industries regulated by categorical pretreatment standards (40 CFR Part 405 – 471) are performed on a periodic basis. These industries are referred to as Categorical Industrial Users (CIUs) if they discharge the regulated wastewater into the local Publicly Owned Treatment Works (POTW). Kohler has processes (Electroplating, Electroless Plating, etc) in the Sheridan facility that are regulated by 40 CFR Part 433 and discharges regulated wastewater to the City of Sheridan POTW. Therefore, Kohler is a CIU. In accordance to 40 CFR 403.12(e), Kohler must submit periodic reports to the Control Authority (ADEQ or Department) and in accordance with 40 CFR 403.8(f)(2)(v) be inspected by the Control Authority at least bi-annually. The Department appreciates Kohler taking the time on Wednesday (September 21, 2011) to show the ADEQ Engineer/Inspector (Rufus Torrence) the facility in Sheridan.

The inspection consisted of inspecting the plating operations and the treatment system. These operations (electroless plating and electroplating) are core operations. Core operations are the key processes in determining the applicability of the 40CFR433 category. The Sheridan plant makes brass and plastic

faucets. The plastic parts are electroless plated with palladium/nickel and then electroplated with copper. The copper plated plastic and brass parts are then electroplated with chrome. Kohler has no open floor drains in the plant which connect directly to the POTW. Wastewater enters open floor drains and flows to the pretreatment system. The pretreatment system has four primary feed streams (Hex Chrome, Nickel, Copper and Rinse wastewater). The Hex Chrome in the wastewater is reduced to Tri-valent Chrome and combined with the other three streams. The combined streams are treated, sampled, metered and discharged to the POTW.

According to 40CFR433.12(a) Kohler may submit a Toxic Organic Management Plan in lieu of sampling for TTOs; presently, Kohler is required to sample for the 110 toxic organic, seven metals and total cyanide for each semi-annual report. Kohler may review the EPA Guidance Manual for Implementing Total Toxic Organics Pretreatment Standards by accessing this web site:

<http://www.epa.gov/npdes/pubs/owm0021.pdf>

Kohler can find an example of a Toxic Organic Management Plan in Appendix D of this manual.

During the inspection, the inspector took a sample of the regulated wastewater that was entering the local POTW. The ADEQ lab analysis is attached. The wastewater complies with the limits in 40 CFR 433.

Kohler must continue sampling (at least semi-annually) all regulated wastewater for all 40 CFR 433 parameters before it enters the POTW.

The Department appreciates Kohler's continued efforts in periodic reporting.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us.

Sincerely,



Rufus Torrence,
ADEQ Engineer/Inspector

Attachments: ADEQ Lab Analysis
ADEQ Inspection Report dated [September 21, 2011](#)

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 & MAILING ADDRESS KOHLER Company Sheridan, AR 72150	B. FACILITY & LOCATION ADDRESS 415 S. Oklahoma St. Sheridan, AR 72150
C. FACILITY CONTACT: JAMES HOUSE TELEPHONE NUMBER: 870-942-2111	
(2) REPORTING PERIOD-- FISCAL YEAR From January 1 to December 31 (Both Semi-Annual Reports must cover Fiscal Year)	
A. MONTHS WHICH REPORTS ARE DUE <u>JANUARY & JULY</u>	B. PERIOD COVERED BY THIS REPORT FROM: January, 2013 TO: June 30, 2013
(3) DESCRIPTION OF OPERATION	
A. REGULATED PROCESSES <u>CORE PROCESS(ES)</u> CHECK EACH APPLICABLE BLOCK <input checked="" type="checkbox"/> Electroplating <input checked="" type="checkbox"/> Electroless Plating <input type="checkbox"/> Anodizing <input type="checkbox"/> Coating <input type="checkbox"/> Chemical Etching and Milling <input type="checkbox"/> Printed Circuit Board Manufacture <u>ANCILLARY PROCESS(ES)*</u> LIST BELOW EACH PROCESS USED IN THE FACILITY <u>BRAZING</u> <u>ACID/ALKALI CLEANING</u> <hr/> <hr/> <hr/> <hr/>	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. <div style="text-align: center; font-size: 1.5em; font-family: cursive;"> July 2013 SAR AR 0034347 AFIN 27 - 00004 </div>
*SEE 40CFR.10(a) FOR 40 DIFFERENT OPERATIONS	
C. Number of Regular Employees at this Facility <u>258</u>	D. [Reserved]

CJH0A

RT

July 9, 2013

KOHLER.

Mr. Rufus Torrence
NPDES Pretreatment Engineer
Arkansas Department of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118



Re: **SEMI-ANNUAL REPORT 1st HALF 2013**

Dear Mr. Torrence,

In accordance with 40CFR403.12 (e) we are submitting semi-annual reports for the months January 1, 2013 through June 30, 2013. Attached with this report is the TTO/CN analysis for this period. Please contact me at 870-917-6215 should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "James House".

James House
Safety/Environmental Specialist

Attachments: TTO/CN Analysis for the 1st half of 2013

Cc: Jim Bilgo, EHS Supervisor, Kohler, WI
Dick Pfarrer, Global Faucets Program Coordinator
David Fitzgerald, Sheridan Waterworks
File

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Anc)	63,662	218,800	POTW Continuous
Regulated (Cyanide)	0	0	N/A
§403.6(e) Unregulated*	0	0	N/A
§403.6(e) Dilute	0	0	N/A
Cooling Water	0	0	N/A
Sanitary	37,755	87,595	POTW Continuous
Total Flow to POTW	101,417	348,562	*****

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 OF TREATMENT SYSTEM

Treated water samples are sent weekly to commercial lab for analysis. In-house testing performed twice per shift. Results of in-house tests are hand delivered to city each Monday. Monthly DMR is also submitted.

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	0.69	2.77	3.38	0.69	3.98	0.43	2.61	MDL	2.13
Monthly Ave	0.26	1.71	2.07	0.43	2.38	0.24	1.48	MDL	--
Max Measured	0.005	2.05	0.66	0.015	1.12	0.02	0.25	0.02	0.00
Ave Measured	0.005	0.58	0.24	0.015	0.33	0.02	0.04	0.02	0.00

*PROVIDE THE CONCENTRATION HERE IF NO CERTIFICATION IS PROVIDED IN SECTION 6 BELOW OR MARK N/A IF A CERTIFICATION IS PROVIDED.

Sample Location #001 AFTER TREATMENT/BEFORE DISCHARGE

Sample Type (Grab or Composite) COMPOSITE

Number of Samples and Frequency Collected 1/WEEK - (IN-HOUSE 2/SHIFT)

40CFR136 Preservation and Analytical Methods Use: Yes No

(6) CERTIFICATION

A. CYANIDE CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with pretreatment standards, I certify that to the best of my knowledge, cyanide has not been used or generated in our processes which are regulated by the Metal Finishing (40CFR 433) categorical pretreatment standards since the filing of the last semi-annual compliance report.

(Typed Name)

(Corporate Officer or authorized representative)

Date of Signature

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 waste waters 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 Pollution Control and Ecology.

N/A

(Typed Name)

(Corporate Officer or authorized representative)

Date of Signature

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 instruments(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 _____ 2012 .

Notary Public in and for _____
County, Arkansas

My commission expires _____

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]

§6602 [42 U.S.C. 1310] 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

ATTACHMENTS:
TTO/CN Analysis
Semi-Annual Metals Analysis

cc: Dick Pfarrer - KOHLER EHS
David Fitzgerald - Sheridan Waterworks
File

(9) SIGNATORY REQUIREMENTS [40CFR403.12(1)]

I certify under penalty of law that I have personally examined and am familiar with the information in this semi-annual compliance report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Bill Royals
NAME OF CORPORATE OFFICIER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

Director of Arkansas Faucet Operations
OFFICIAL TITLE

7/9/2013
DATE SIGNED

DATE	GALLONS	DATE	GALLONS	Date	GALLONS	DATE	GALLONS
1/1/13	Holiday	2/1/13	79300	3/1/13	57000	4/1/13	105500
1/2/13	68500	2/2/13	Saturday	3/2/13	Saturday	4/2/13	97900
1/3/13	71400	2/3/13	Sunday	3/3/13	Sunday	4/3/13	115000
1/4/13	70900	2/4/13	115400	3/4/13	106600	4/4/13	97500
1/5/13	7/17/46	2/5/13	101400	3/5/13	93400	4/5/13	26900
1/6/13	Sunday	2/6/13	96600	3/6/13	90100	4/6/13	7400
1/7/13	101800	2/7/13	91400	3/7/13	90700	4/7/13	Sunday
1/8/13	92500	2/8/13	75500	3/8/13	60300	4/8/13	101400
1/9/13	100400	2/9/13	9500	3/9/13	Saturday	4/9/13	76300
1/10/13	107800	2/10/13	Sunday	3/10/13	Sunday	4/10/13	78200
1/11/13	119000	2/11/13	98600	3/11/13	93700	4/11/13	115000
1/12/13	38400	2/12/13	58800	3/12/13	95000	4/12/13	66700
1/13/13	Sunday	2/13/13	85800	3/13/13	83000	4/13/13	22700
1/14/13	83400	2/14/13	95300	3/14/13	81800	4/14/13	Sunday
1/15/13	93800	2/15/13	59700	3/15/13	80400	4/15/13	91400
1/16/13	91200	2/16/13	Saturday	3/16/13	63800	4/16/13	106400
1/17/13	101700	2/17/13	Sunday	3/17/13	Sunday	4/17/13	91200
1/18/13	60200	2/18/13	88200	3/18/13	86700	4/18/13	91400
1/19/13	Saturday	2/19/13	85500	3/19/13	90700	4/19/13	29400
1/20/13	Sunday	2/20/13	90500	12/1/60	45500	4/20/13	Saturday
1/21/13	116400	2/21/13	86900	3/21/13	112800	4/21/13	Sunday
1/22/13	99900	2/22/13	53000	3/22/13	53900	4/22/13	101000
1/23/13	159000	2/23/13	Saturday	3/23/13	Saturday	4/23/13	93300
1/24/13	37400	2/24/13	Sunday	3/24/13	Sunday	4/24/13	123000
1/25/13	36900	2/25/13	94400	3/25/13	93600	4/25/13	111300
1/26/13	10400	2/26/13	91200	3/26/13	7400	4/26/13	33600
1/27/13	Sunday	2/27/13	82300	3/27/13	96700	4/27/13	10000
1/28/13	64000	2/28/13	86000	3/28/13	76900	4/28/13	Sunday
1/29/13	117800			3/29/13	Holiday	4/29/13	79700
1/30/13	83600			3/30/13	Saturday	4/30/13	96300
1/31/13	93800			3/31/13	Sunday		
	1943400		1725300		1660000		1968500

DATE	GALLONS	DATE	GALLONS
5/1/13	118300	6/1/13	Saturday
5/2/13	112100	6/2/13	Sunday
5/3/13	83500	6/3/13	108500
5/4/13	Saturday	6/4/13	117200
5/5/13	Sunday	6/5/13	107900
5/6/13	116900	6/6/13	104300
5/7/13	95200	6/7/13	42700
5/8/13	105000	6/8/13	31000
5/9/13	117800	6/9/13	Sunday
5/10/13	79800	6/10/13	100100
5/11/13	23700	6/11/13	115400
5/12/13	Sunday	6/12/13	101600
5/13/13	136700	6/13/13	107900
5/14/13	126700	6/14/13	69000
5/15/13	121800	6/15/13	Saturday
5/16/13	126700	6/16/13	Sunday
5/17/13	31000	6/17/13	120300
5/18/13	Saturday	6/18/13	99400
5/19/13	Sunday	6/19/13	121700
5/20/13	113900	6/20/13	119200
5/21/13	103100	6/21/13	73900
5/22/13	126200	6/22/13	73900
5/23/13	114000	6/23/13	Sunday
5/24/13	Down	6/24/13	107200
5/25/13	Saturday	6/25/13	114200
5/26/13	Sunday	6/26/13	117800
5/27/13	Holiday	6/27/13	92900
5/28/13	136400	6/28/13	34200
5/29/13	224900	6/29/13	Saturday
5/30/13	51400	6/30/13	Sunday
5/31/13	71200		
	2336300		2080300



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

01 July 2013

James House
Kohler-Plating - Sheridan
415 S Oklahoma St.
Sheridan, AR 72150

RE: Semiannual Wastewater Sample(s)

SDG Number: 1306154

Enclosed are the results of analyses for samples received by the laboratory on 11-Jun-13 15:26. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

Custody Seals	✓
Containers Correct	✓
COC/Labels Agree	✓
Preservation Confirmed	✓
Received On Ice	✓
Temperature on Receipt	3.0°C

Sincerely,

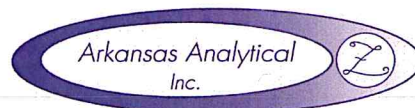
A handwritten signature in purple ink that reads "Norma James".

Norma James
President

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01 July 2013

James House
Kohler-Plating - Sheridan
415 S Oklahoma St.
Sheridan, AR 72150
Project: Semiannual Wastewater Sample(s)



Date Received: 11-Jun-13 15:26

CASE NARRATIVE

Sample Delivery Group – 1306154

Revised Analytical and/or Quality Control Results are Discussed Below:

At client request, sample 1306154-01 was reanalyzed for Arsenic. The revised results are on the following report page(s).

01 July 2013



James House
Kohler-Plating - Sheridan
415 S Oklahoma St.
Sheridan, AR 72150
Project: Semiannual Wastewater Sample(s)

Date Received: 11-Jun-13 15:26

ANALYTICAL RESULTS

Lab Number: 1306154-01RE2
Sample Name: Wastewater Composite
Date/Time Collected: 6/11/13 6:00
Sample Matrix: Water

Total Metals	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Arsenic	mg/L	< 0.0112		6/28/13 11:00	A306371	200.7, Rev 4.4 (1994)

QUALITY CONTROL RESULTS

Total Metals -- Batch: A306371 (Water)
Prepared: 26-Jun-13 14:10 By: ST -- Analyzed: 26-Jun-13 17:25 By: ST

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Arsenic	<0.0110 mg/L	105% / NA	111% / 106%		3.87%	

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

Reviewed by: _____
Norma James
President



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

18 June 2013

James House
Kohler-Plating - Sheridan
415 S Oklahoma St.
Sheridan, AR 72150

RE: Semiannual Wastewater Sample(s)
SDG Number: 1306154

Enclosed are the results of analyses for samples received by the laboratory on 11-Jun-13 15:26. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

Custody Seals	✓
Containers Correct	✓
COC/Labels Agree	✓
Preservation Confirmed	✓
Received On Ice	✓
Temperature on Receipt	3.0°C

Sincerely,

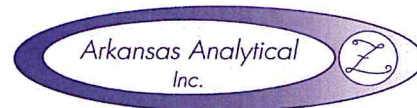
A handwritten signature in cursive script that reads "Norma James".

Norma James
President

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18 June 2013

James House
Kohler-Plating - Sheridan
415 S Oklahoma St.
Sheridan, AR 72150
Project: Semiannual Wastewater Sample(s)



Date Received: 11-Jun-13 15:26

CASE NARRATIVE

Sample Delivery Group – 1306154

Qualified Analytical and/or Quality Control Results are Discussed Below:

Volatiles Analysis:

Second Source Verification Failure (E5): Acrolein failed to recover within method specified requirements in the second source verification of the initial calibration curve. Acrolein was qualified as "estimated" (E5) in all samples and in the quality control section of the final report.

Matrix Spike/Matrix Spike Duplicate (MS/MSD) Failure: Acrolein failed to recover within acceptance criteria in the MS and/or MSD sample. The recoveries were qualified by "%D1" in the quality control section of the final report. Acrolein was qualified as "estimated" (E20) in the parent sample, 1306154-01.

Semivolatiles Analysis:

Continuing Calibration Verification (CCV) Failure (E21): 3,3-Dichlorobenzidine failed (low) to meet method criteria in the CCV associated with sample 1306154. 3,3-Dichlorobenzidine was qualified as "estimated" (E21) in the sample and in the quality control section of the final report.

Continuing Calibration Verification (CCV) Failure (E-01): 2,4-Dinitrophenol and 4,6-Dinitro-2-methylphenol failed (high) to meet method criteria in the CCV associated with sample 1306154. 2,4-Dinitrophenol and 4,6-Dinitro-2-methylphenol were qualified as "estimated" (E-01) in the associated samples and in the quality control section of the final report. If the sample is non-detect for the analyte, the CCV has demonstrated the analyte would have been detected if it were present.

Laboratory Control Spike/Laboratory Control Spike Duplicate (LCS/LCSD) Surrogate Failure: The surrogate Terphenyl-d14 failed to recover within acceptance criteria in the LCS/LCSD sample. The recoveries were qualified by "%D3."

Pesticides Analysis:

Continuing Calibration Verification (CCV) Failure (E-01): Chlordane failed (high) to meet method criteria in the CCV associated with sample 1306154. Chlordane was qualified as "estimated" (E-01) in the associated samples and in the quality control section of the final report. If the sample is non-detect for the analyte, the CCV has demonstrated the analyte would have been detected if it were present.

18 June 2013



James House
 Kohler-Plating - Sheridan
 415 S Oklahoma St.
 Sheridan, AR 72150
 Project: Semiannual Wastewater Sample(s)

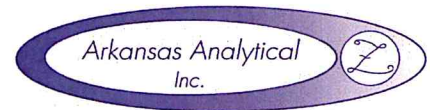
Date Received: 11-Jun-13 15:26

ANALYTICAL RESULTS

Lab Number: 1306154-01
 Sample Name: Wastewater Composite
 Date/Time Collected: 6/11/13 6:00
 Sample Matrix: Water

Acid Compounds	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
2,4,6-Trichlorophenol	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
2,4-Dichlorophenol	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
2,4-Dimethylphenol	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
2,4-Dinitrophenol	ug/L	< 50.0	E-01	6/12/13 21:51	A306149	625 (mod.)
2-Chlorophenol	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
2-Nitrophenol	ug/L	< 20.0		6/12/13 21:51	A306149	625 (mod.)
4-Chloro-3-methylphenol	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
4-Nitrophenol	ug/L	< 50.0		6/12/13 21:51	A306149	625 (mod.)
4,6-Dinitro-2-methylphenol	ug/L	< 50.0	E-01	6/12/13 21:51	A306149	625 (mod.)
Pentachlorophenol	ug/L	< 5.00		6/12/13 21:51	A306149	625 (mod.)
Phenol	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
2,4,6-Tribromophenol [surr]	%	83.8		6/12/13 21:51	A306149	625 (mod.)
2-Fluorophenol [surr]	%	39.2		6/12/13 21:51	A306149	625 (mod.)
Phenol-d5 [surr]	%	29.9		6/12/13 21:51	A306149	625 (mod.)
Base/Neutral Compounds	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
1,2,4-Trichlorobenzene	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
1,2-Dichlorobenzene	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
1,2-Diphenyl Hydrazine	ug/L	< 20.0		6/12/13 21:51	A306149	625 (mod.)
1,3-Dichlorobenzene	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
1,4-Dichlorobenzene	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
2,3,7,8-TCDD Screen	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
2,4-Dinitrotoluene	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
2,6-Dinitrotoluene	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
2-Chloronaphthalene	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
3,3'-Dichlorobenzidine	ug/L	< 5.00	E21	6/12/13 21:51	A306149	625 (mod.)
4-Bromophenyl-phenylether	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
4-Chlorophenyl-phenylether	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
Acenaphthene	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
Acenaphthylene	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
Anthracene	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
Benzidine	ug/L	< 50.0		6/12/13 21:51	A306149	625 (mod.)
Benzo[a]pyrene	ug/L	< 5.00		6/12/13 21:51	A306149	625 (mod.)
Benzo[b]fluoranthene	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
Benzo[g,h,i]perylene	ug/L	< 20.0		6/12/13 21:51	A306149	625 (mod.)
Benzo[k]fluoranthene	ug/L	< 5.00		6/12/13 21:51	A306149	625 (mod.)
Benzo (a) anthracene	ug/L	< 5.00		6/12/13 21:51	A306149	625 (mod.)
Bis(2-chloroethoxy)methane	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
Bis(2-chloroethyl)ether	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
Bis(2-chloroisopropyl)ether	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
Bis(2-ethylhexyl)phthalate	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
Butylbenzylphthalate	ug/L	< 10.0		6/12/13 21:51	A306149	625 (mod.)
Chrysene	ug/L	< 5.00		6/12/13 21:51	A306149	625 (mod.)
Dibenz[a,h]anthracene	ug/L	< 5.00		6/12/13 21:51	A306149	625 (mod.)

18 June 2013



James House
Kohler-Plating - Sheridan
415 S Oklahoma St.
Sheridan, AR 72150
Project: Semiannual Wastewater Sample(s)

Date Received: 11-Jun-13 15:26

ANALYTICAL RESULTS

Lab Number: 1306154-01
Sample Name: Wastewater Composite
Date/Time Collected: 6/11/13 6:00
Sample Matrix: Water

Table with 7 columns: Base/Neutral Compounds, Units, Result, Qualifier(s), Date/Time Analyzed, Batch, Method. Lists various chemical compounds and their concentrations.

Table with 7 columns: Pesticides/PCBs, Units, Result, Qualifier(s), Date/Time Analyzed, Batch, Method. Lists various pesticides and their concentrations.

James House
 Kohler-Plating - Sheridan
 415 S Oklahoma St.
 Sheridan, AR 72150
 Project: Semiannual Wastewater Sample(s)

Date Received: 11-Jun-13 15:26

ANALYTICAL RESULTS

Lab Number: 1306154-01
 Sample Name: Wastewater Composite
 Date/Time Collected: 6/11/13 6:00
 Sample Matrix: Water

Pesticides/PCBs	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Aroclor-1232	ug/L	< 0.200		6/18/13 11:34	A306222	608
Aroclor-1248	ug/L	< 0.200		6/18/13 11:34	A306222	608
Aroclor-1260	ug/L	< 0.200		6/18/13 11:34	A306222	608
Aroclor-1016	ug/L	< 0.200		6/18/13 11:34	A306222	608
Toxaphene	ug/L	< 0.300		6/18/13 11:34	A306222	608
TCMX [surr]	%	32.4		6/18/13 11:34	A306222	608
DCBP [surr]	%	82.3		6/18/13 11:34	A306222	608

Total Metals	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Arsenic	mg/L	0.0119		6/12/13 16:44	A306165	200.7, Rev 4.4 (1994)
Cadmium	mg/L	< 0.000500		6/12/13 16:44	A306165	200.7, Rev 4.4 (1994)
Chromium	mg/L	0.160		6/12/13 16:44	A306165	200.7, Rev 4.4 (1994)
Copper	mg/L	0.141		6/12/13 16:44	A306165	200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0150		6/12/13 16:44	A306165	200.7, Rev 4.4 (1994)
Mercury	mg/L	< 0.000200		6/18/13 10:24	A306239	7470A/245.1,3.0- 1994
Molybdenum	mg/L	< 0.0300		6/12/13 16:44	A306165	200.7, Rev 4.4 (1994)
Nickel	mg/L	0.145		6/12/13 16:44	A306165	200.7, Rev 4.4 (1994)
Selenium	mg/L	< 0.0500		6/12/13 16:44	A306165	200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0200		6/12/13 16:44	A306165	200.7, Rev 4.4 (1994)
Zinc	mg/L	0.00772		6/12/13 16:44	A306165	200.7, Rev 4.4 (1994)

Volatiles	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
1,1-Dichloroethane	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
1,1-Dichloroethene	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
1,1,1-Trichloroethane	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
1,1,2-Trichloroethane	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
1,1,2,2-Tetrachloroethane	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
1,2-Dichlorobenzene	ug/L	< 5.00		6/13/13 12:05	A306176	624 (mod.)
1,2-Dichloropropane	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
1,2-Dichloroethane	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
1,3-Dichlorobenzene	ug/L	< 5.00		6/13/13 12:05	A306176	624 (mod.)
1,4-Dichlorobenzene	ug/L	< 5.00		6/13/13 12:05	A306176	624 (mod.)
2-Chloroethyl vinyl ether	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
Acrylonitrile	ug/L	< 20.0		6/13/13 12:05	A306176	624 (mod.)
Benzene	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
Bromodichloromethane	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
Bromoform	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
Acrolein	ug/L	< 50.0	E20, E5	6/13/13 12:05	A306176	624 (mod.)
Bromomethane	ug/L	< 50.0		6/13/13 12:05	A306176	624 (mod.)
Carbon tetrachloride	ug/L	< 2.00		6/13/13 12:05	A306176	624 (mod.)
Chlorobenzene	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
Chlorodibromomethane	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
Chloroethane	ug/L	< 50.0		6/13/13 12:05	A306176	624 (mod.)
Chloroform	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)

18 June 2013



James House
Kohler-Plating - Sheridan
415 S Oklahoma St.
Sheridan, AR 72150
Project: Semiannual Wastewater Sample(s)

Date Received: 11-Jun-13 15:26

ANALYTICAL RESULTS

Lab Number: 1306154-01
Sample Name: Wastewater Composite
Date/Time Collected: 6/11/13 6:00
Sample Matrix: Water

<u>Volatiles</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Chloromethane	ug/L	< 50.0		6/13/13 12:05	A306176	624 (mod.)
cis-1,3-Dichloropropene	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
Ethylbenzene	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
Methylene chloride	ug/L	< 20.0		6/13/13 12:05	A306176	624 (mod.)
Tetrachloroethene	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
Toluene	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
trans-1,2-Dichloroethene	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
Trichloroethene	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
trans-1,3-Dichloropropene	ug/L	< 10.0		6/13/13 12:05	A306176	624 (mod.)
Vinyl chloride	ug/L	< 2.00		6/13/13 12:05	A306176	624 (mod.)
Trichlorofluoromethane	ug/L	< 50.0		6/13/13 12:05	A306176	624 (mod.)
Dichlorodifluoromethane	ug/L	< 50.0		6/13/13 12:05	A306176	624 (mod.)
4-Bromofluorobenzene [surr]	%	97.6		6/13/13 12:05	A306176	624 (mod.)
1,2-Dichloroethane-d4 [surr]	%	98.9		6/13/13 12:05	A306176	624 (mod.)
Toluene-d8 [surr]	%	101		6/13/13 12:05	A306176	624 (mod.)
<u>Wet Chemistry</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
BOD-5	mg/L	5.10		6/12/13 13:00	A306230	5210 B-2001,Hach 13060
Cyanide (total)	mg/L	< 0.010		6/17/13 11:42	A306211	4500-CN B,E-1999
TSS	mg/L	4.8		6/12/13 11:49	A306158	2540 D-1997

ANALYTICAL RESULTS

Lab Number: 1306154-02
Sample Name: Wastewater Grab
Date/Time Collected: 6/11/13 6:00
Sample Matrix: Water

<u>Wet Chemistry</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Oil and Grease	mg/L	< 2.6		6/13/13 9:00	A306167	1664A Mod

18 June 2013



James House
 Kohler-Plating - Sheridan
 415 S Oklahoma St.
 Sheridan, AR 72150
 Project: Semiannual Wastewater Sample(s)

Date Received: 11-Jun-13 15:26

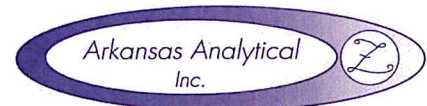
QUALITY CONTROL RESULTS

Base/Neutral Compounds -- Batch: A306149 (Water)

Prepared: 12-Jun-13 10:00 By: CT -- Analyzed: 12-Jun-13 20:47 By: TB

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
1,2,4-Trichlorobenzene	<10.0 ug/L	75.2% / NA	57.4% / 61.8%		7.40%	
1,2-Dichlorobenzene	<10.0 ug/L	84.5% / NA	61.4% / 62.7%		2.10%	
1,2-Diphenyl Hydrazine	<20.0 ug/L	88.8% / NA	71.0% / 85.6%		18.7%	
1,3-Dichlorobenzene	<10.0 ug/L	76.8% / NA	58.5% / 61.9%		5.58%	
1,4-Dichlorobenzene	<10.0 ug/L	84.6% / NA	62.5% / 66.6%		6.31%	
2,4,6-Trichlorophenol	<10.0 ug/L	68.4% / NA	57.8% / 56.9%		1.53%	
2,4-Dichlorophenol	<10.0 ug/L	80.9% / NA	63.6% / 69.8%		9.23%	
2,4-Dimethylphenol	<10.0 ug/L	73.6% / NA	52.0% / 64.6%		21.6%	
2,4-Dinitrophenol	<50.0 ug/L	83.1% / NA	85.4% / 94.4%		9.96%	E-01
2,4-Dinitrotoluene	<10.0 ug/L	87.9% / NA	84.5% / 79.9%		5.55%	
2,6-Dinitrotoluene	<10.0 ug/L	88.8% / NA	66.4% / 71.0%		6.55%	
2-Chloronaphthalene	<10.0 ug/L	71.6% / NA	61.5% / 71.3%		14.9%	
2-Chlorophenol	<10.0 ug/L	81.0% / NA	61.5% / 64.1%		4.19%	
2-Nitrophenol	<20.0 ug/L	77.4% / NA	55.9% / 71.0%		23.6%	
3,3'-Dichlorobenzidine	<50.0 ug/L	86.2% / NA	74.2% / 76.1%		2.56%	E21
4,6-Dinitro-2-methylphenol	<50.0 ug/L	106% / NA	90.6% / 99.4%		9.29%	E-01
4-Bromophenyl-phenylether	<10.0 ug/L	91.2% / NA	80.7% / 93.1%		14.2%	
4-Chloro-3-methylphenol	<10.0 ug/L	90.5% / NA	78.3% / 86.7%		10.2%	
4-Chlorophenyl-phenylether	<10.0 ug/L	89.7% / NA	69.9% / 76.8%		9.40%	
4-Nitrophenol	<50.0 ug/L	49.6% / NA	41.9% / 39.6%		4.78%	
Acenaphthene	<10.0 ug/L	71.7% / NA	66.6% / 71.3%		6.83%	
Acenaphthylene	<10.0 ug/L	77.3% / NA	61.0% / 70.8%		14.9%	
Anthracene	<10.0 ug/L	100% / NA	81.3% / 90.9%		11.1%	
Benzidine	<50.0 ug/L	86.6% / NA	59.8% / 68.9%		14.0%	
Benzo (a) anthracene	<5.00 ug/L	93.7% / NA	75.0% / 85.0%		12.6%	
Benzo[a]pyrene	<5.00 ug/L	87.9% / NA	73.2% / 84.3%		14.1%	
Benzo[b]fluoranthene	<10.0 ug/L	81.6% / NA	74.7% / 76.8%		2.70%	
Benzo[g,h,i]perylene	<20.0 ug/L	69.1% / NA	63.2% / 75.1%		17.2%	
Benzo[k]fluoranthene	<5.00 ug/L	94.2% / NA	76.6% / 91.5%		17.8%	
Bis(2-chloroethoxy)methane	<10.0 ug/L	73.6% / NA	54.8% / 65.4%		17.7%	
Bis(2-chloroethyl)ether	<10.0 ug/L	88.2% / NA	61.9% / 67.8%		9.12%	
Bis(2-chloroisopropyl)ether	<10.0 ug/L	87.6% / NA	64.8% / 68.2%		5.13%	
Bis(2-ethylhexyl)phthalate	<10.0 ug/L	104% / NA	88.5% / 87.1%		1.65%	
Butylbenzylphthalate	<10.0 ug/L	113% / NA	86.5% / 88.8%		2.60%	
Chrysene	<5.00 ug/L	89.1% / NA	68.0% / 74.5%		9.10%	
Dibenz[a,h]anthracene	<5.00 ug/L	50.8% / NA	46.7% / 55.8%		17.7%	
Diethylphthalate	<10.0 ug/L	82.8% / NA	74.4% / 72.5%		2.59%	
Dimethylphthalate	<10.0 ug/L	84.2% / NA	75.1% / 79.0%		5.04%	
Di-n-butylphthalate	<10.0 ug/L	96.7% / NA	85.8% / 94.4%		9.50%	
Di-n-octylphthalate	<10.0 ug/L	96.9% / NA	82.7% / 88.7%		6.92%	
Fluorene	<10.0 ug/L	73.8% / NA	65.0% / 69.1%		6.14%	
Hexachlorobenzene	<5.00 ug/L	91.7% / NA	76.5% / 91.5%		17.9%	
Hexachlorobutadiene	<10.0 ug/L	65.4% / NA	48.6% / 58.8%		19.1%	
Hexachlorocyclopentadiene	<10.0 ug/L	64.2% / NA	46.5% / 53.2%		13.4%	
Hexachloroethane	<20.0 ug/L	83.4% / NA	59.9% / 60.7%		1.40%	
Indeno[1,2,3-cd]pyrene	<5.00 ug/L	73.2% / NA	68.9% / 70.1%		1.73%	
Isophorone	<10.0 ug/L	79.5% / NA	55.8% / 68.1%		19.8%	
Naphthalene	<10.0 ug/L	58.9% / NA	44.8% / 55.0%		20.5%	

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QUALITY CONTROL RESULTS

Base/Neutral Compounds -- Batch: A306149 (Water)

Prepared: 12-Jun-13 10:00 By: CT -- Analyzed: 12-Jun-13 20:47 By: TB

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Nitrobenzene	<10.0 ug/L	73.9% / NA	54.9% / 63.7%		14.8%	
N-Nitrosodimethylamine	<50.0 ug/L	52.2% / NA	43.6% / 42.6%		2.40%	
N-Nitroso-di-n-propylamine	<20.0 ug/L	98.3% / NA	69.3% / 66.6%		3.91%	
N-Nitrosodiphenylamine/diphenylamine	<20.0 ug/L	94.8% / NA	80.8% / 93.9%		14.9%	
Pentachlorophenol	<5.00 ug/L	87.9% / NA	79.5% / 90.9%		13.3%	
Phenanthrene	<10.0 ug/L	94.0% / NA	82.2% / 90.2%		9.30%	
Phenol	<10.0 ug/L	41.2% / NA	29.6% / 33.6%		12.9%	
Pyrene	<10.0 ug/L	93.9% / NA	75.4% / 85.2%		12.3%	
2,4,6-Tribromophenol [surr]	88.7 %	96.4% / NA	83.5% / 82.9%		NA	
2-Fluorobiphenyl [surr]	81.6 %	77.8% / NA	59.3% / 70.7%		NA	
2-Fluorophenol [surr]	67.5 %	63.1% / NA	43.8% / 48.1%		NA	
Nitrobenzene-d5 [surr]	87.1 %	70.5% / NA	53.1% / 61.3%		NA	
Phenol-d5 [surr]	48.1 %	49.6% / NA	36.4% / 40.1%		NA	
Terphenyl-d14 [surr]	95.4 %	108% / NA	80.3% / 87.7%		NA	%D3

Wet Chemistry -- Batch: A306158 (Water)

Prepared: 12-Jun-13 11:49 By: AP -- Analyzed: 12-Jun-13 11:49 By: Allen

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
TSS	<1.0 mg/L	100% / 99.0%	NA / NA		1.01%	

Total Metals -- Batch: A306165 (Water)

Prepared: 12-Jun-13 15:42 By: ST -- Analyzed: 12-Jun-13 16:52 By: MH

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Arsenic	<0.0100 mg/L	94.6% / NA	97.2% / 90.0%		7.47%	
Cadmium	<0.000500 mg/L	85.9% / NA	84.9% / 79.9%		6.08%	
Chromium	<0.0100 mg/L	90.6% / NA	85.4% / 79.1%		5.58%	
Copper	<0.00500 mg/L	93.7% / NA	85.6% / 78.9%		6.15%	
Lead	<0.0150 mg/L	89.7% / NA	82.3% / 77.1%		6.50%	
Molybdenum	<0.0300 mg/L	89.0% / NA	88.9% / 84.0%		5.59%	
Nickel	<0.0100 mg/L	91.5% / NA	85.2% / 79.1%		5.44%	
Selenium	<0.0500 mg/L	86.4% / NA	87.8% / 81.9%		6.94%	
Silver	<0.0200 mg/L	91.5% / NA	80.6% / 75.4%		6.71%	
Zinc	<0.00500 mg/L	86.8% / NA	87.2% / 81.0%		7.21%	

Wet Chemistry -- Batch: A306167 (Water)

Prepared: 13-Jun-13 09:00 By: AT -- Analyzed: 13-Jun-13 09:00 By: AT

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Oil and Grease	<2.5 mg/L	91.2% / 92.5%	80.0% / NA		1.43%	

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QUALITY CONTROL RESULTS

Volatiles -- Batch: A306176 (Water)

Prepared: 13-Jun-13 09:49 By: KR -- Analyzed: 13-Jun-13 13:19 By: KR

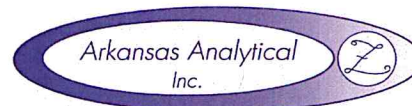
Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
1,1,1-Trichloroethane	<10.0 ug/L	90.8% / NA	95.1% / 101%		5.62%	
1,1,2,2-Tetrachloroethane	<10.0 ug/L	101% / NA	111% / 108%		3.05%	
1,1,2-Trichloroethane	<10.0 ug/L	105% / NA	107% / 99.8%		7.18%	
1,1-Dichloroethane	<10.0 ug/L	99.1% / NA	103% / 109%		6.11%	
1,1-Dichloroethene	<10.0 ug/L	86.2% / NA	97.1% / 97.8%		0.719%	
1,2-Dichlorobenzene	<5.00 ug/L	100% / NA	106% / 95.2%		11.2%	
1,2-Dichloroethane	<10.0 ug/L	97.6% / NA	98.1% / 106%		7.29%	
1,2-Dichloropropane	<10.0 ug/L	102% / NA	100% / 92.2%		8.20%	
1,3-Dichlorobenzene	<5.00 ug/L	98.2% / NA	110% / 102%		7.57%	
1,4-Dichlorobenzene	<5.00 ug/L	102% / NA	112% / 94.4%		17.0%	
2-Chloroethyl vinyl ether	<10.0 ug/L	108% / NA	104% / 108%		3.61%	
Acrolein	<50.0 ug/L	77.6% / NA	38.2% / 16.3%		80.4%	%D1, D, E5
Acrylonitrile	<20.0 ug/L	95.2% / NA	92.8% / 95.3%		2.66%	
Benzene	<10.0 ug/L	99.2% / NA	102% / 107%		3.99%	
Bromodichloromethane	<10.0 ug/L	97.5% / NA	100% / 93.6%		7.01%	
Bromoform	<10.0 ug/L	103% / NA	94.6% / 92.4%		2.40%	
Bromomethane	<50.0 ug/L	86.8% / NA	93.7% / 94.9%		1.28%	
Carbon tetrachloride	<2.00 ug/L	93.9% / NA	97.6% / 101%		3.62%	
Chlorobenzene	<10.0 ug/L	106% / NA	107% / 100%		6.40%	
Chlorodibromomethane	<10.0 ug/L	105% / NA	105% / 94.9%		10.0%	
Chloroethane	<50.0 ug/L	72.6% / NA	85.6% / 78.4%		8.80%	
Chloroform	<10.0 ug/L	95.8% / NA	106% / 103%		2.71%	
Chloromethane	<50.0 ug/L	69.2% / NA	77.3% / 91.5%		16.9%	
cis-1,3-Dichloropropene	<10.0 ug/L	102% / NA	102% / 95.1%		6.59%	
Dichlorodifluoromethane	<50.0 ug/L	84.2% / NA	91.0% / 94.3%		3.58%	
Ethylbenzene	<10.0 ug/L	106% / NA	110% / 101%		8.94%	
Methylene chloride	<20.0 ug/L	91.5% / NA	93.0% / 97.1%		4.29%	
Tetrachloroethene	<10.0 ug/L	106% / NA	108% / 96.8%		10.6%	
Toluene	<10.0 ug/L	104% / NA	109% / 99.3%		8.97%	
trans-1,2-Dichloroethene	<10.0 ug/L	96.3% / NA	103% / 115%		11.4%	
trans-1,3-Dichloropropene	<10.0 ug/L	102% / NA	107% / 94.8%		11.8%	
Trichloroethene	<10.0 ug/L	108% / NA	97.8% / 91.9%		6.23%	
Trichlorofluoromethane	<50.0 ug/L	86.7% / NA	94.7% / 97.2%		2.53%	
Vinyl chloride	<2.00 ug/L	91.4% / NA	93.0% / 99.9%		7.14%	
1,2-Dichloroethane-d4 [surr]	97.9 %	101% / NA	102% / 104%		NA	
4-Bromofluorobenzene [surr]	98.3 %	100% / NA	99.4% / 97.5%		NA	
Toluene-d8 [surr]	98.4 %	107% / NA	105% / 95.4%		NA	

Wet Chemistry -- Batch: A306211 (Water)

Prepared: 17-Jun-13 08:23 By: KP -- Analyzed: 17-Jun-13 11:42 By: KP

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Cyanide (total)	<0.010 mg/L	87.7% / NA	89.0% / 79.7%		11.1%	

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QUALITY CONTROL RESULTS

Pesticides/PCBs -- Batch: A306222 (Water)

Prepared: 17-Jun-13 13:35 By: MB -- Analyzed: 18-Jun-13 11:22 By: MB

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
4,4'-DDD	<0.100 ug/L	80.2% / 70.3%	73.2% / NA		13.2%	
4,4'-DDE	<0.100 ug/L	66.7% / 60.1%	58.8% / NA		10.4%	
4,4'-DDT	<0.020 ug/L	90.6% / 74.7%	81.5% / NA		19.3%	
Aldrin	<0.010 ug/L	60.8% / 57.8%	49.9% / NA		5.08%	
alpha-BHC	<0.050 ug/L	79.6% / 81.5%	75.8% / NA		2.43%	
beta-BHC	<0.050 ug/L	68.4% / 67.2%	71.0% / NA		1.71%	
delta-BHC	<0.050 ug/L	86.8% / 76.8%	66.9% / NA		12.2%	
Dieldrin	<0.020 ug/L	68.7% / 63.8%	57.3% / NA		7.42%	
Endosulfan I	<0.010 ug/L	69.9% / 65.3%	57.4% / NA		6.83%	
Endosulfan II	<0.020 ug/L	78.1% / 67.9%	70.0% / NA		14.1%	
Endosulfan sulfate	<0.100 ug/L	103% / 77.5%	94.9% / NA		28.1%	
Endrin	<0.020 ug/L	75.0% / 67.8%	67.3% / NA		10.2%	
Endrin aldehyde	<0.100 ug/L	119% / 91.6%	74.2% / NA		25.9%	
gamma-BHC (Lindane)	<0.050 ug/L	62.8% / 63.0%	48.4% / NA		0.382%	
Heptachlor	<0.010 ug/L	62.6% / 62.1%	44.9% / NA		0.804%	
Heptachlor epoxide	<0.010 ug/L	63.0% / 61.8%	52.6% / NA		1.95%	
DCBP [surr]	49.0 %	78.0% / 55.7%	67.8% / NA		NA	
TCMX [surr]	46.2 %	51.2% / 48.8%	38.5% / NA		NA	

Wet Chemistry -- Batch: A306230 (Water)

Prepared: 12-Jun-13 13:00 By: KP -- Analyzed: 12-Jun-13 13:00 By: KP

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
BOD-5	<2.00 mg/L	92.9% / 94.4%	NA / NA		1.62%	

Total Metals -- Batch: A306239 (Water)

Prepared: 18-Jun-13 08:53 By: ST -- Analyzed: 18-Jun-13 10:28 By: ST

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Mercury	<0.000200 mg/L	94.3% / NA	100% / 91.4%		8.96%	

QUALIFIER(S)

- *%D1: Matrix Spike and/or Matrix Spike Duplicate Percent Recovery Does Not Meet Laboratory Acceptance Criteria
- *%D3: Surrogate Percent Recovery Does Not Meet Laboratory Acceptance Criteria
- *D: RPD Value Does Not Meet Laboratory Acceptance Criteria
- *E-01: Estimated Result; This Analyte Failed "High" in the CCV; If the sample is non-detect for this analyte, the CCV demonstrated the analyte would have been detected were it present.
- *E20: Estimated Result Due to Matrix Spike and/or Matrix Spike Duplicate Failure; This sample was used as the "parent sample" in MS/MSD prep.
- *E21: Estimated Result; This Analyte failed (low) in the CCV.
- *E5: Estimated Result Due to Quality Control Failure

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

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

Reviewed by: _____

Norma James
President

CLIENT INFORMATION
 Kohler
 415 South Oklahoma St.
 Sheridan, AR 72150

Project Description
 Semi-Annual TTO Sample

Reporting Information
 Telephone: 870-942-2111
 Email: james.house@kohler.com, joe.neelroy@kohler.com, neal.hollinger@kohler.com

Turnaround Time
 24 Hour
 48 Hour
 72 Hour
 Routine (5 Day)

Preservation Codes:
 1. Cool, 4 Degrees Centigrade
 2. Sulfuric Acid (H₂SO₄), pH < 2
 3. Nitric Acid (HNO₃), pH < 2
 4. Thiosulfate for Dechlorination
 5. Hydrochloric Acid (HCl)
 6. Sodium Hydroxide (NaOH), pH > 12

Bottle Type:
 G = Glass; P = Plastic
 V = Septum; A = Amber

Sampler(s) Signature			Sampler(s) Printed			Sample Identification/Description	Sample Matrix	Number of Bottles	Grab	Compl.										
Date/s			Time/s																	
<i>Jym Smith</i>			<i>KYPH SMITH</i>			Wastewater Composite	Water	9	X	X	BOD, TSS	Cyanide	As, Cd, Cr, Cu, Pb, Mo, Ni, Se, Ag, Zn, Hg	PS Volatiles	PS Pesticides/PCBs	PS BNAs	Oil and Grease			
											6/10-6/11	6 AM - 6 AM	6 AM							
6/11																				

TEST PARAMETERS
 1. P
 2. P
 3. P
 4. GA
 5. GA
 6. GA

Arkansas Analytical Work Order Number:
 1700154

01
02

RECEIVED BY: (Signature) *Allen Parker* Date/Time 6/11 AM

1. Relinquished by: (Signature) *Jym Smith* Date/Time 6/11 AM

2. Received by: (Signature) *Allen Parker* Date/Time 6/11 AM

3. Relinquished by: (Signature) *Allen Parker* Date/Time 6/11/13 1526

4. Received by lab: (Signature) *Amanda Johnson* Date/Time 6/11/13

5. Received on ice: 3°C

6. Temperature on receipt:

FOR COMPLETION BY LAB ONLY

REMARKS / SAMPLE COMMENTS
 FLOW 100/100

SAMPLE CONDITION UPON RECEIPT IN LAB
 1. CUSTODY SEALS: Yes ___ No ___
 2. CONTAINERS CORRECT: Yes ___ No ___
 3. COC/LABELS AGREE: Yes ___ No ___
 4. PRESERVATION CONFIRMED: Yes ___ No ___
 5. RECEIVED ON ICE: Yes ___ No ___
 6. TEMPERATURE ON RECEIPT: 3°C

