ARP000011
11-00046

Allen

STICKLER CONSULTING SERVICES, LLC
Andy Stickler – Managing Member

200 Rosewood Drive · Paragould, AR 72450 · Phone 870.236.0832 · Fax 870.239.9724 · email astick@grnco.net

7543

Complete/compliant
No action necessary
AE

January 28th, 2010

Mr. Allen Gilliam, Pretreatment Engineer
Arkansas Department of Environmental Quality – NPDES Division
5301 Northshore Drive
North Little Rock, AR 72118

Re: Semi-Annual Report for the L. A. Darling Company facility located in Corning, Arkansas. (This report covers the six (6) month period from July 1st, 2009 through December 31st, 2009).

Dear Mr. Gilliam:

Attached, you will find the Semi-Annual report for the L. A. Darling Company facility located in Corning, AR. This report covers information regarding Darling's wastewater effluent for the six (6) month period from July 1st, 2009 through December 31st, 2009, and is submitted in accordance with 40 CFR 403.12(e).

Based on previous correspondence and conversations, please note that L. A. Darling Company officially terminated operation of their on-site, metals precipitation wastewater treatment system, effective December 31st, 2009. The system was still operational during the entire period covered by this Semi-Annual Report, so the sample type and location is reflected accordingly.

With elimination of the on-site treatment system, Darling is now discharging rinse water from the three (3) powder coating surface preparation systems directly to the sewer without treatment. Through several series of analyses, including samples you collected during your recent inspection, Darling has proven that this water can meet Categorical Discharge Limits (40 CFR Part 433 – Metal Finishing) without any form of treatment. With this change, concentrated cleaners for each of the three powder coating surface preparation lines, will be pumped out and hauled off-site for disposal in the future.

Because the three (3) rinse tanks discharge directly into the sewer, there is no common collection point for sampling purposes. For this reason, future sampling for Semi-Annual reporting will be conducted using a series of grab sample aliquots (of like volume) from each of the three rinse tanks, over a period of 8 hours. These grab samples will be combined into one (1) composite sample, and that sample will be submitted for the required analyses. **I have included a site diagram to illustrate the new sampling points (as well as the city sewer connections).**

Finally, you will note that, in addition to the report itself, I have also included a copy of analytical results, as well as a copy of the Chain-Of-Custody. The Toxic Organic Management Plan (TOMP) which Darling submitted with the January, 2006 Semi-Annual Report is still accurate and effectively implemented.

As always, please don't hesitate to contact me directly (870-236-0832 or email astick@grnco.net), or Mr. Tommy Campbell at L. A. Darling Company, should you have any questions regarding this Semi-Annual Report. Your continued support, patience and consideration is greatly appreciated.

Sincerely,
SCS

Andy Stickler
Managing Member

ATTACHMENTS
cc: City of Corning, Wastewater Superintendent

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433/403.6(e)

Use of this form is not an EPA/ADEQ requirement. Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION

A. LEGAL NAME & MAILING ADDRESS	B. FACILITY & LOCATION ADDRESS
L. A. Darling Company P. O. Box 970 1401 Hwy. 49 B. North Paragould, AR 72450	L. A. Darling Company - Corning Facility P. O. Box 338 Wooten Lane Corning, AR 72422

C. FACILITY CONTACT: Robert Jean TELEPHONE NUMBER: (870) 239-9564

(2) REPORTING PERIOD--FISCAL YEAR From January 1st to December 31st (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE	B. PERIOD COVERED BY THIS REPORT
January & July	FROM: July 1st, 2009 TO: December 31st, 2009

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

CHECK EACH APPLICABLE BLOCK

- ☐ Electroplating
- ☐ Electroless Plating
- ☐ Anodizing
- ☑ Coating * (Iron Phosphatizing)
- ☐ Chemical Etching and Milling
- ☐ Printed Circuit Board Manufacture

ANCILLARY PROCESS(ES)*

LIST BELOW EACH PROCESS USED IN THE FACILITY

Cleaning

Polishing

All Regulated Discharges Enter Our Waste Treatment System. Sampling is Performed At the System Effluent

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.

C. Number of Regular Employees at this Facility: 300	D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average Flow	Maximum Flow	Type of Discharge
Regulated (Total)	18,851	25,135	Continuous
Regulated (Cyanide)	0	0	None
§403.6(e) Unregulated*	0	0	None
§403.6(e) Dilute	0	0	None
Cooling Water	0	0	None
Sanitary	3,000	4,500	Continuous
Total Flow to POTW	21,851	29,635	**********

*"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

Treatment System is an Hydroxide Precipitation System followed by a Clarifier, Sand Filter and pH Adjustment.

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*
MAC	0.109	2.739	3.342	0.682	3.936	0.425	2.581	1.187	2.106
AAC	0.069	1.691	2.047	0.425	2.353	0.237	1.463	0.643	***
AMMC	<0.004	<0.007	<0.006	<0.04	0.031	<0.007	0.050	0.044	NA
AMAC	<0.004	<0.007	<0.006	<0.04	0.031	<0.007	0.050	0.044	NA

MAC <=> Max Alternate Conc AAC <=> Ave Alternate Conc AMMC <=> Actual Measured Max Conc AMAC <=> Actual Measured Ave Conc
See 40CFR403.6(e) for details on Alternate Concentrations

Sample Location Waste Treatment Effluent

Sample Type (Grab or Composite) Composite

Number of Samples and Frequency Collected *See Attached Chain-Of-Custody

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 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 dated January 18th, 2006. The current TOMP, which was submitted to the Arkansas Department of Environmental Quality with the Semi-Annual Compliance Report in January, 2006, is still accurate and complete.

Tommy Campbell, Director of Operations
(Typed Name)

Tommy Campbell
(Corporate Officer or authorized representative)

Date of Signature 1-28-10

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 _____, 199__.

_____
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. 13101] **Findings and Policy** para (b) Policy.--*The Congress hereby declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.*

The User may list any new or ongoing Pollution Prevention practices:

(8) GENERAL COMMENTS

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

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.

Tommy Campbell
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Tommy Campbell
SIGNATURE

Director of Operations
OFFICIAL TITLE

1-28-10
DATE SIGNED

AMERICAN INTERPLEX CORPORATION
LABORATORIES

L. A. Darling Company
Post Office Box 970
Paragould, AR 72451-0970

ANALYTICAL RESULTS

AIC No. 135080-1
Sample Identification: Darling DSA1 12/30/09 1545

Analyte		Result	RL	Units	Qualifier
Arsenic		**< 0.05**	0.05	**mg/l**	
EPA 200.7	Prep: 31-Dec-2009 1217 by 270	Analyzed: 04-Jan-2010 1811 by 270		Batch: S26986	
Cadmium		**< 0.004**	0.004	**mg/l**	
EPA 200.7	Prep: 31-Dec-2009 1217 by 270	Analyzed: 04-Jan-2010 1811 by 270		Batch: S26986	
Chromium		**< 0.007**	0.007	**mg/l**	
EPA 200.7	Prep: 31-Dec-2009 1217 by 270	Analyzed: 04-Jan-2010 1811 by 270		Batch: S26986	
Copper		**< 0.006**	0.006	**mg/l**	
EPA 200.7	Prep: 31-Dec-2009 1217 by 270	Analyzed: 04-Jan-2010 1811 by 270		Batch: S26986	
Lead		**< 0.04**	0.04	**mg/l**	
EPA 200.7	Prep: 31-Dec-2009 1217 by 270	Analyzed: 04-Jan-2010 1811 by 270		Batch: S26986	
Nickel		**0.031**	0.01	**mg/l**	
EPA 200.7	Prep: 31-Dec-2009 1217 by 270	Analyzed: 04-Jan-2010 1811 by 270		Batch: S26986	
Silver		**< 0.007**	0.007	**mg/l**	
EPA 200.7	Prep: 31-Dec-2009 1217 by 270	Analyzed: 06-Jan-2010 1215 by 270		Batch: S26986	
Zinc		**0.050**	0.002	**mg/l**	
EPA 200.7	Prep: 31-Dec-2009 1217 by 270	Analyzed: 04-Jan-2010 1811 by 270		Batch: S26986	

AIC No. 135080-2
Sample Identification: Darling DSA2 12/30/09 1530

Analyte		Result	RL	Units	Qualifier
Total Cyanide		**0.044**	0.01	**mg/l**	
SM4500-CN C,E	Prep: 04-Jan-2010 0850 by 291	Analyzed: 04-Jan-2010 1721 by 291		Batch: W31284	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Corning, AR Facility

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: L.A. Darling Company
Project Reference: Semi Annual Report
Project Manager:
Sampled By: Andy Stickler

PO No.

SAMPLE MATRIX: WATER, SOIL, WASTEWATER

NO OF BOTTLES

ANALYSES REQUESTED: Arsenic, Cadmium, Chromium, Copper, Lead, Nickel, Silver, Zinc, Total Cyanide

AIC CONTROL NO: 135080
AIC PROPOSAL NO:
Carrier: Fed-X
Received Temperature C: 2

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL	WASTEWATER	NO OF BOTTLES	Remarks
1	DSA 1	12/30/09 1545		✓			✓	1	
2	DSA 2	12/30/09 1530		✓			✓	1	
							1 P	2 P	Field pH calibration
		Container Type					P	P	on _____ @ _____
		Preservative					N	B	Buffer:

G = Glass, P = Plastic, V = VOA vials, H = HCl to pH2, T = Sodium Thiosulfate
NO = none, S = Sulfuric acid pH2, N = Nitric acid pH2, B = NaOH to pH12, Z = Zinc acetate

Turnaround Time Requested: (Please circle)
NORMAL or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: Andy Stickler
Phone: 870-236-0832 Fax: 870-239-9724
Report Attention to: Andy Stickler
Report Address to: 200 Rosewood Dr.
Paragould, AR 72450

Relinquished By:	Date/Time	Received By:	Date/Time
Andy Stickler	12/30/09 1845		
Relinquished By:	Date/Time	Received in Lab By: Peggy Hopton	Date/Time 12-31-09 0830

Comments: Please send Bill to: L.A. Darling Company
Woodlawn Lane
Corning, AR 72422
If possible email Report to Andy Stickler @ astick@grnco.net

5/01 WS 5981 8/02 FORM 0060

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