Wilson, Tabatha

From: Gilliam, Allen
Sent: Monday, July 29, 2013 2:28 PM
To: Richard Hexamer; sales
Cc: Fuller, Kim; Wilson, Tabatha; Mena Mike Spencer (menawwtp@gmail.com); Denise.Georgiou@CH2M.com; Uyeda, Craig; Anderson, Alan
Subject: AR0036692_Street and Performance ARP001057June 2013 quarterly Pretreatment report and ADEQ response regarding April 2013 non compliance_20130729
Attachments: 965650.pdf; ADEQ.PDF; 433 semi annual report FORM 2013.doc

Richard,

If you have not discharged any regulated process wastewater from the last batch discharge a simple letter stating this with a signed certification statement will suffice. Something to effect of, **There has been no regulated process wastewater discharged to the City of Mena's sewage collection system since April 9, 2013. 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.**

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE **SIGNATURE**

_____ _____

would suffice…

OFFICIAL TITLE **DATE SIGNED**

There was some confusion about your last discharge and whose results were based on representative samples taken back in April of this year. The City's sample results (1st attachment) indicated Street and Performance (S&P) was in violation of its Metal Finishing copper and nickel monthly average limits in 40 CFR 433.17. The City's samples were taken at the prescribed sample/discharge point from the PVC pipe which directly enters the City's sewage system.

S&P's April results (2nd attachment) indicated compliance with the Metal Finishing limitations although it was discovered through our phone discussions your samples were taken at the holding/treatment tank which would not have been representative of discharged wastewater at the proper sampling point.

It was discussed the bottom of conical holding/treatment tank may have been "stirred" up when you began discharging bringing the tank bottoms into the mix bringing up the "settled" metals Cu and Ni causing the City's sample to show non-compliance. Please submit a corrective action plan within thirty (30) days of this correspondence explaining how this situation will be rectified.

Please submit within thirty (30) days from the date on this correspondence a comprehensive wastewater flow schematic of your processes and "pretreatment" indicating flow directions with arrows from generation through pretreatment to the appropriate sampling point AND a comprehensive process narrative which includes the chemicals (not trade names) used in all of S&P's

wastewater generating processes. This schematic and a process narrative are both required in 40 CFR 403.12(b).

The wastewater flow schematic I have on S&P is not accurate and a current narrative of your processes (which should match-up to your flow schematic) cannot be located.

Again, for your convenience please find attached (3rd attachment) a clean semi-annual report (you may use this for your quarterly reports) form in MS Word for you use unless the City has given you a different form.

Thank you for your prompt attention to this matter.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Craig Uyeda / Enforcement Branch Manager
Alan Anderson / Enforcement Administrator
Mike Spencer / City of Mena's Wastewater Manager
Denise Georgiou / City of Mena's consultant engineer

E/NPDES/NPDES/Pretreatment/Reports

From: Richard Hexamer [mailto:richard@hotrodlane.cc]
Sent: Monday, July 01, 2013 10:49 AM
To: Gilliam, Allen
Subject: Re: AR0036692_STREET & PERFORMANCE ARP001057 incomplete periodic compliance report 2nd response_20130610

Allen,
We have no discharging since last onewe spoke of and are still traeting the batch tank what do you suggest as to filling out the reports you need?

Thanks,
Richard

AMERICAN INTERPLEX CORPORATION LABORATORIES

April 8, 2013
Control No. 166286

MIKE SPENSER

Street and Performance Company
ATTN: Mr. Richard E. Hexamer
#1 Hotrod Lane
Mena, AR 71953

This report contains the analytical results and supporting information for the sample submitted on April 4, 2013. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Laboratory Director or a qualified designee.

John Overbey
Laboratory Director

ALL LIMITS ARE BELOW STANDARDS FOR DISCHARGE

AMERICAN INTERPLEX
CORPORATION
LABORATORIES

Street and Performance Company
#1 Hotrod Lane
Mena, AR 71953

SAMPLE INFORMATION

Project Description:
One (1) water sample(s) received on April 4, 2013
Waste Water
Batch Tank
P.O. No. 21869

Receipt Details:
A Chain of Custody was provided. The samples were delivered in one (1) ice chest.
Ice chest #1 was delivered with shipping documentation.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

Laboratory ID	Client Sample ID	Sampled Date/Time	Notes
166286-1	Main Batch 4/3/13 1400hrs	03-Apr-2013 1400	

Qualifiers:
D Result is from a secondary dilution factor

References:
"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).
"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.
"Standard Methods for the Examination of Water and Wastewaters", 21st edition.
"American Society for Testing and Materials" (ASTM).
"Association of Analytical Chemists" (AOAC).

AMERICAN INTERPLEX CORPORATION
LABORATORIES

April 8, 2013
Control No. 166286

Street and Performance Company
#1 Hotrod Lane
Mena, AR 71953

ANALYTICAL RESULTS

AIC No. 166286-1
Sample Identification: Main Batch 4/3/13 1400hrs

Analyte		Result	RL	Units	Qualifier
Total Recoverable Cadmium		< 0.004	0.004	mg/l	
EPA 200.7	Prep: 04-Apr-2013 1145 by 271	Analyzed: 08-Apr-2013 1508 by 270		Batch: S34347	
Total Recoverable Chromium		0.025	0.007	mg/l	
EPA 200.7	Prep: 04-Apr-2013 1145 by 271	Analyzed: 08-Apr-2013 1508 by 270		Batch: S34347	
Total Recoverable Copper		0.85	0.03	mg/l	D
EPA 200.7	Prep: 04-Apr-2013 1145 by 271	Analyzed: 08-Apr-2013 0858 by 305		Batch: S34347	Dil: 5
Total Recoverable Lead		< 0.04	0.04	mg/l	
EPA 200.7	Prep: 04-Apr-2013 1145 by 271	Analyzed: 08-Apr-2013 1508 by 270		Batch: S34347	
Total Recoverable Nickel		0.91	0.05	mg/l	D
EPA 200.7	Prep: 04-Apr-2013 1145 by 271	Analyzed: 08-Apr-2013 0858 by 305		Batch: S34347	Dil: 5
Total Recoverable Silver		< 0.007	0.007	mg/l	
EPA 200.7	Prep: 04-Apr-2013 1145 by 271	Analyzed: 08-Apr-2013 1508 by 270		Batch: S34347	
Total Recoverable Zinc		0.079	0.01	mg/l	D
EPA 200.7	Prep: 04-Apr-2013 1145 by 271	Analyzed: 08-Apr-2013 0858 by 305		Batch: S34347	Dil: 5

AMERICAN INTERPLEX CORPORATION
LABORATORIES

Street and Performance Company
#1 Hotrod Lane
Mena, AR 71953

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Recoverable Cadmium	0.05 mg/l	93.5	85.0-115			S34347	04Apr13 0845 by 271	04Apr13 2000 by 305		
Total Recoverable Chromium	0.05 mg/l	94.2	85.0-115			S34347	04Apr13 0845 by 271	04Apr13 2000 by 305		
Total Recoverable Copper	0.05 mg/l	93.1	85.0-115			S34347	04Apr13 0845 by 271	04Apr13 2000 by 305		
Total Recoverable Lead	0.05 mg/l	93.5	85.0-115			S34347	04Apr13 0845 by 271	04Apr13 2000 by 305		
Total Recoverable Nickel	0.05 mg/l	92.4	85.0-115			S34347	04Apr13 0845 by 271	04Apr13 2000 by 305		
Total Recoverable Silver	0.02 mg/l	98.8	85.0-115			S34347	04Apr13 0845 by 271	04Apr13 2000 by 305		
Total Recoverable Zinc	0.05 mg/l	96.4	85.0-115			S34347	04Apr13 0845 by 271	04Apr13 2000 by 305		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Recoverable Cadmium	166261-1	0.05 mg/l	95.3	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2005 by 305		
	166261-1	0.05 mg/l	93.4	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2011 by 305		
	Relative Percent Difference:		2.11	20.0	S34347				
Total Recoverable Chromium	166261-1	0.05 mg/l	103	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2005 by 305		
	166261-1	0.05 mg/l	101	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2011 by 305		
	Relative Percent Difference:		1.83	20.0	S34347				
Total Recoverable Copper	166261-1	0.05 mg/l	91.1	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2005 by 305		
	166261-1	0.05 mg/l	92.2	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2011 by 305		
	Relative Percent Difference:		1.05	20.0	S34347				
Total Recoverable Lead	166261-1	0.05 mg/l	95.2	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2005 by 305		
	166261-1	0.05 mg/l	93.9	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2011 by 305		
	Relative Percent Difference:		1.41	20.0	S34347				
Total Recoverable Nickel	166261-1	0.05 mg/l	92.3	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2005 by 305		
	166261-1	0.05 mg/l	92.7	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2011 by 305		
	Relative Percent Difference:		0.396	20.0	S34347				
Total Recoverable Silver	166261-1	0.02 mg/l	82.3	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2005 by 305		
	166261-1	0.02 mg/l	81.2	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2011 by 305		
	Relative Percent Difference:		1.32	20.0	S34347				
Total Recoverable Zinc	166261-1	0.05 mg/l	80.4	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2005 by 305		
	166261-1	0.05 mg/l	82.4	75.0-125	S34347	04Apr13 0845 by 271	04Apr13 2011 by 305		
	Relative Percent Difference:		2.24	20.0	S34347				

LABORATORY BLANK RESULTS

Analyte	Result	RL	PQL	QC Sample	Preparation Date	Analysis Date	Qual
Total Recoverable Cadmium	< 0.0001 mg/l	0.0001	0.0001	S34347-1	04Apr13 0845 by 271	04Apr13 1955 by 305	
Total Recoverable Chromium	< 0.007 mg/l	0.007	0.007	S34347-1	04Apr13 0845 by 271	04Apr13 1955 by 305	
Total Recoverable Copper	< 0.001 mg/l	0.001	0.001	S34347-1	04Apr13 0845 by 271	04Apr13 1955 by 305	
Total Recoverable Lead	< 0.001 mg/l	0.001	0.001	S34347-1	04Apr13 0845 by 271	04Apr13 1955 by 305	
Total Recoverable Nickel	< 0.001 mg/l	0.001	0.001	S34347-1	04Apr13 0845 by 271	04Apr13 1955 by 305	
Total Recoverable Silver	< 0.0002 mg/l	0.0002	0.0002	S34347-1	04Apr13 0845 by 271	04Apr13 1955 by 305	
Total Recoverable Zinc	< 0.002 mg/l	0.002	0.002	S34347-1	04Apr13 0845 by 271	04Apr13 1955 by 305	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE OF

Client: Sheen-4 Performance Inc.
Project Reference: Waste Water Batch Tank
Project Manager: Richard Hexamer
Sampled By: Jeremy Ratley

PO No.

SAMPLE MATRIX: W A T E R | S O I L

NO OF BOTTLES

ANALYSES REQUESTED[1]

AIC CONTROL NO: 166286
AIC PROPOSAL NO:
Carrier/Tracking No. UPS
Received Temperature C 17.2

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL	NO OF BOTTLES	ANALYSES REQUESTED[1]	Remarks
1	Main Batch	4/3/13 1400hr	✓		✓		1	Metals only	
		Container Type							Field pH calibration
		Preservative							on ____ @ ____
									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 2 DAYS
Expedited results requested by: Richard Hexamer
Who should AIC contact with questions: Same
Phone: 479-394-5711 Fax: 479-394-7113
Report Attention to: Richard Hexamer
Report Address to: P.O. Box 1168 Mena AR. 71953

Relinquished By:	Date/Time	Received By:	Date/Time
J. Ratley	4/3/13 1400	N. Foster	4/3/13 1400
Relinquished By:	Date/Time	Received In Lab By:	Date/Time
N. Foster	4/3/13 1400	Lisa Pulens	4-4-13 1000

Comments:
UPS. 1Z717 6616 3593 7 5316

19-Oct-09

FORM 0060

AMERICAN INTERPLEX CORPORATION
LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: MENA
Project Reference:
Project Manager:
Sampled By:

PO No.

Sample Matrix: W A T E R | S O I L

No of BOTTLES

Analyses Requested: Metals (see attached sheet) | Cyanide

AIC Control No:
AIC Proposal No:
Carrier:
Received Temperature °C

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL		BOTTLES	Metals (see attached sheet)	Cyanide	Remarks
1	S&P001	09APR2013 see comments		X	X			1	X	X	
2	S&P002	09APR2013 see comments		X	X			1		X	
		Container Type						P	P	P	Field pH calibration
		Preservative							N	B	on _____ @ _____ 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: _____
Phone: _____ Fax: _____
Report Attention to: _____
Report Address to:

Relinquished By:	Date/Time	Received By:	Date/Time
Richard Hernandez	09 Apr 13 1354		09APR13 1354
Relinquished By:	Date/Time	Received in Lab By:	Date/Time
	09APR13 1405		

Comments: Both Composites OF 4 (Four) samples taken as follows
1308, 1323, 1338, 1353
see attached sheet for melals analyses

SECTION B. DISCHARGE LIMITATIONS & MONITORING REQUIREMENTS

The following limitations and monitoring requirements shall apply to discharge from **Location S&P002** except for cyanide and flow usage, which apply as specified in the Table I-1 footnotes. The Permittee shall monitor the discharge from **Locations S&P001** and **S&P002**, and the incoming water usage, and shall be limited as specified below:

Table I-1

Parameter	LIMITATIONS[1]		MONITORING REQUIREMENTS	
	Daily Maximum (mg/l)	Monthly Average[2] (mg/l)	Frequency[3]	Sample Type
Cadmium, total	0.11	0.07	Quarterly	Composite of 4 grabs
Chromium, total	2.77	1.71	Quarterly	Composite of 4 grabs
Copper, total	3.38	2.07	Quarterly	Composite of 4 grabs
Lead, total	0.69	0.43	Quarterly	Composite of 4 grabs
Nickel, total	3.98	2.38	Quarterly	Composite of 4 grabs
Silver, total	0.43	0.24	Quarterly	Composite of 4 grabs
Zinc, total	2.61	1.48	Quarterly	Composite of 4 grabs
Cyanide, total	1.20	0.65	Quarterly	Composite of 4 grabs[4]
~~TTO, 40 CFR 433~~	2.13	-	NA	Certification[4]
Flow, Usage	Report	Report	Continuous	Totalizer[5]
Flow, Discharge	Report	Report	Continuous	Totalizer[6]

[1] It is the Permittee's responsibility to ensure test detection levels are sufficiently low to demonstrate compliance with permit limitations. If an analytical result is below the laboratory detection limit, then the detection limit shall be used in the calculation of pounds unless permitted otherwise by the Control Authority. Use the following or lower detection limits in micrograms per liter (ug/l): 0.5 cadmium, copper, lead, nickel, and silver; 10 for chromium and cyanide; 0.005 for mercury; 20 for zinc.

[2] Monthly average is the average of all daily results in a calendar month regardless of the number of samples analyzed.

[3] Week means Sunday through Saturday. Month means calendar month. Quarter means calendar quarter, Jan-Mar, Apr-Jun, Jul-Sep, and Oct-Dec. For this permit, Quarterly samples shall be collected in March, June, September, and December. The date and time of an individual grab sample is the date and time at which the sample is collected. The date of a composite sample is the date on which sample collection for the composite sample is started and stopped. The composite sample date will be one day if the composite sample is collected on one day, e.g. April 14, 2007, or two days if the composite sample is collected over two days, e.g. April 14-15, 2007. Monitoring by the Control Authority is not a substitute for monitoring required to be conducted by the Permittee in this permit unless the Control Authority notifies the Permittee in writing that specific monitoring by the Control Authority can be used to meet permit frequency requirements.

[4] Cyanide samples must be collected from Location S&P002 unless no process water has flowed through Location S&P002 during the monitoring day, then samples will be from Location S&P001.

[5] The Permittee has a State-approved Toxic Organics Management Plan (TOMP) and must comply with the

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 433

Use of this form is not an ADEQ requirement, but satisfies the reporting requirements in 40 CFR 403.12(e). **Attn: Water Div/NPDES Pretreatment**

(1) IDENTIFYING INFORMATION

A. LEGAL NAME & MAILING ADDRESS	B. FACILITY & LOCATION ADDRESS

C. FACILITY CONTACT: **TELEPHONE NUMBER:** **e-mail:**

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

A. MONTHS WHICH REPORTS ARE DUE	B. PERIOD COVERED BY THIS REPORT
_____ & _____	FROM: TO:

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

CHECK EACH APPLICABLE BLOCK

- ☐ Electroplating
- ☐ Electroless Plating
- ☐ Anodizing
- ☐ Coating (conversion)
- ☐ Chemical Etching and Milling
- ☐ Printed Circuit Board Manufacture

ANCILLARY PROCESS(ES)*

LIST BELOW EACH PROCESS USED IN THE FACILITY

_____

_____

_____

_____

_____

_____

*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.

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

40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: _____

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge*
Regulated (Core &			
Regulated (Cyanide)			
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW			

***If batch discharged please list the period of time between each batch discharge. Do not normalize over that period the average flow.**

***"Unregulated" has a precise legal meaning; see 40CFR403.6(e).**

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

- ☐ **Neutralization**
- ☐ **Chemical Precipitation and Sedimentation**
- ☐ **Chromium Reduction**
- ☐ **Cyanide Destruction**
- ☐ **Other _____**
- ☐ **None**

B. COMMENTS ON TREATMENT SYSTEM

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES--CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

40 CFR 433.17 Pollutant(mg/l) limits	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 Avg	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured									*
Avg Measured**									*

Sample Location _____

Sample Type (Grab* or Composite)_____
***If Grab, list # of grabs over what period of time**
Number of Samples and Frequency Collected_____

40CFR136 Preservation and Analytical Methods Use: ☐ Yes ☐ No (include complete Chain of Custody)

***If a TOMP has been submitted and approved by ADEQ place N/A.**

****A value here is the average of all samples taken during one (1) calendar month regardless of number of samples taken. If only one (1) sample is taken it must meet the monthly average limitation.**

40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: _____

(6) CERTIFICATION

_____

B. CHECK ONE: ☐ §433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED ☐ §433.12(a) TTO CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last semi-annual compliance report. I further certify that this facility is implementing the toxic organic management plan submitted to Arkansas Department of Environmental Quality.

_____
(Typed/Printed Name)

_____
(Corporate Officer or authorized representative signature)

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 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

My commission expires _____.

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

40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: _____

§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 including Best or Environmental Management Practices, Source Reduction, Waste Minimization, Lean Manufacturing, Water and/or Energy Conservaton:

1. _____

2. _____

3. _____

4. _____

5. _____

(8) GENERAL COMMENTS

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.

_____ _____

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE **SIGNATURE**

_____ _____

OFFICIAL TITLE **DATE SIGNED**