

Wilson, Tabatha

From: Torrence, Rufus
Sent: Tuesday, August 06, 2013 9:14 AM
To: Jeff Wages (jwages@syrgis.com)
Cc: Wilson, Tabatha
Subject: AFIN 54-00429 ARP001013 Site Visit to United Initiators SPI for Compliance Assurance: Inspection
Attachments: LTR SGS 20110812.PDF; SGS Disclosure A0000QRLT.pdf; AR0043389_Letter to Syrgis dated August 6, 2010_20130701.pdf; SGS Insp 20130717.doc; SGS Lab Report.doc



August 6, 2013

Mr. Jeff Wages
United Initiators SPI, Inc. aka Syrgis
334 Phillips 311 Road
Helena, AR 72342-9033

Re: Site Visit for Compliance Assurance: Inspection
(Tracking Number: ARP001013 AFIN: 54-00429 City of Helena NPDES No.: AR0043389)

Dear Mr. Wages:

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). Syrgis has processes (Methyl Ethyl Ketone Peroxide and Benzoyl Peroxide initiators for hardening resins and fiberglass) in the Helena facility that are regulated by 40 CFR Part 414.85 and discharges wastewater from these processes into the City of Helena POTW. Therefore, Syrgis is a CIU. In accordance to 40 CFR 403.12(e), Syrgis 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 Syrgis taking the time on Wednesday (July 17, 2013) to show the ADEQ Engineer/Inspector (Rufus Torrence) the facility in Helena.

Syrgis was recently sold to a German company and the name was changed to United Initiators SPI, Inc. See attached disclosure statement for more details.

The inspection consisted of a pre-inspection meeting, visiting the MEKP and BPO buildings for wastewater sampling. During the meeting the Inspector and Syrgis agreed that the Lead and Zinc limits in ADEQ letter dated August 6, 2010 (attached) were still applicable. The MEKP and BPO operations are continuous and generate over 3600 tons of production each year. The Inspector took a grab samples of the regulated wastewater from each process building before it enter the on-site collection system (which enters the ponds prior to discharge to the POTW). Syrgis lab personnel composited the samples in accordance to ADEQ letter date August 12, 2011 (attached). The attached ADEQ lab analysis is inconclusive. The sample had a precipitant floating on it and ADEQ lab personnel had to dilute the sample. Therefore, the detection levels were elevated because of the matrix interference. The non-detect levels are too high to verify compliance. Since Syrgis was not actually discharging wastewater at the time of the site visit (all processes were shutdown), the Department will deem Syrgis compliant on the date of the Department's visit.

The Department appreciates Syrgis'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 for July 17, 2013 Site Visit for Compliance Assurance
Disclosure
Letters dated August 6, 2010 & August 12, 2011

ADEQ

ARKANSAS
Department of Environmental Quality

August 12, 2011

Mr. Jeff Wages
Syrgis Performance Initiators, Inc.
334 Phillips 311 Road
Helena, AR 72342-9033

Re: Syrgis 2011 August Semi-Annual Pretreatment Report
(Tracking Number: ARP001013 AFIN: 54-00429 City of Helena NPDES No.: AR0043389)

Dear Mr. Wages:

The Department has reviewed Syrgis' August 2011 semi-annual report. In accordance with the terms in the Department's letter dated August 6, 2010, Syrgis appears to have violated the calculated effluent limit for zinc. The calculated limit for zinc is 132 µg/l and Syrgis reported 157 µg/l. Syrgis' stormwater enters the same treatment pond as the process wastewater. Syrgis sampled the effluent from this pond.

Syrgis must sample only the process wastewater to verify compliance with the limits in 40 CFR 414.85 (Sub Part H). In accordance with 40 CFR 414.111(b), since Syrgis does not have a lead or zinc bearing waste stream listed in Appendix A, Syrgis must comply with the lead and zinc limits shown in the Department letter dated August 6, 2010. To verify compliance Syrgis must sample the process wastewater before it enters the pond and commingles with the stormwater. Syrgis' process wastewater enters the pond in three different lines. Syrgis must sample each line and may take grab samples (in lieu of flow proportional sampling). Syrgis may composite the three samples in proportion to flow and submit only the one composite sample to the lab for analysis. Please resample for zinc and submit the new results for zinc to the Department within thirty days of receiving this letter or by September 30, 2011 (whichever comes first).

The Department encourages Syrgis to continue sampling the potable water from time to time to document current levels. If Syrgis has concerns or requires more details, please contact Rufus Torrence at (501) 682-0626 or torrence@adeq.state.ar.us.

Sincerely,



Rufus J. Torrence, Water Division Engineer

Encl: ADEQ Letters dated 9-4-2009 and 8-6-2010



ARKANSAS
Department of Environmental Quality

September 4, 2009

Mr. Jeff Wages
Syrgis Performance Initiators, Inc.
334 Phillips 311 Road
Helena, AR 72342-9033

Re: Syrgis (Tracking Number: ARP001013 AFIN: 54-00429) Pretreatment Inspection

Dear Mr. Wages:

On July 15, 2009 the Department pretreatment staff conducted a sampling inspection of the Syrgis Helena facility. The Department appreciates Syrgis' efforts and time in assisting with the inspection. Please find enclosed the pretreatment inspection report. Please review the report and let the Department know if Syrgis finds any errors. Also enclosed is the Department lab analysis from the collected sample. The Department's lab analysis shows zinc at 0.615 mg/l and lead at 0.025 mg/l in the effluent entering the Helena POTW. In the past Syrgis has not tested for lead. Please note that Syrgis must test the effluent for ALL regulated parameters including lead.

In previous correspondence, the Department considered adjusting Syrgis' limits to allow for dilution (Syrgis combines sanitary wastewater with regulated wastewater). Syrgis declared that the Helena facility does not contain a metal bearing stream listed in Appendix A in 40 CFR 414. Since the only parameters detected in the effluent are metals, 40 CFR 403.6(e) is not applicable and Syrgis must demonstrate that these metals enter the facility in the intake potable water.

At this time Syrgis appears to have no processes which contribute zinc to the wastewater. The zinc in the effluent may be entering with the intake water and may be simply passing through the plant unaltered. Before the Department makes a final determination, please sample the intake water on a calendar quarterly basis for a period of one year. The attached analysis may serve as the required analysis for the July- Sep 2009 quarter. Syrgis must sample (only zinc and lead) the intake water for three additional quarters (Oct- Dec 2009, Jan- Mar 2010 & April - May 2010). If these sampling results confirm that the zinc and lead are in the intake water, Syrgis will not be required to sample the intake water in the future.

In accordance with 40 CFR 403.15, Syrgis can take credit for the metals in the intake water. For the February 2010 report, Syrgis' effluent must not exceed by 20% the highest previous potable metal concentrations. The contract lab must use **EPA Method 200.8** instead of Method 200.7.

September 4, 2009

Page 2 of 2

Syrgis has two options for future reports:

Option 1: Syrgis may discontinue all testing of the drinking water after May 2010. Syrgis metal concentrations in the effluent must not exceed by 20% the highest previous reported metal potable concentration. If Syrgis reports a concentration higher than this value or an ADEQ lab report shows a value higher than this value, the Department will deem that Syrgis has violated the 40CFR414 categorical pretreatment standard for zinc or lead.

Option 2: If the metal concentration in the effluent remains consistently higher than the metal concentration in the intake water, Syrgis may actually have a process which contributes metals to the wastewater. According to 40 CFR 414.85 (b), "the Control Authority [the Department] on a case-by-case basis" can identify "additional process wastewater streams...as metal or cyanide bearing" streams. Syrgis may petition the Department to have a particular metal bearing stream(s) designated as a 40 CFR 414 metal bearing stream. If the petition is successful, the 40 CFR 414 zinc limits (1.05 & 2.61 mg/l) and lead limits (0.32 & 0.69 mg/l) would be applicable to Syrgis' effluent.

Please note that under Option 1, Syrgis currently has violations for 40 CFR 414 pretreatment standards for lead and zinc. These violations may be mitigated by future intake water analyses.

Please note that before the Department considers Option 2, Syrgis must demonstrate that a BMP (Best Management Practices) will not significantly impact "non-process" sources of zinc and lead.

If Syrgis has concerns or requires more details, please contact Rufus Torrence at (501) 682-0626 or torrence@adeq.state.ar.us.

Sincerely,

Rufus J. Torrence, Water Division Engineer

Encl: Pretreatment Inspection Report dated July 15, 2009

ADEQ Lab Report 2009-1761

Syrgis (Rineco 9094) Lab Report

EPA Local Limits Development Guidance Appendices; Appendix V Domestic Pollutant Loading



ARKANSAS
Department of Environmental Quality

August 6, 2010

Mr. Jeff Wages
Syrgis Performance Initiators, Inc.
334 Phillips 311 Road
Helena, AR 72342-9033

Re: Syrgis 2010 August Semi-Annual Pretreatment Report
(Tracking Number: ARP001013 AFIN: 54-00429 City of Helena NPDES No.: AR0043389)

Dear Mr. Wages:

The Department has reviewed Syrgis' August 2010 semi-annual report. This report contained both categorical and additional sampling data required by the Department's letter dated September 4, 2009. A copy of this letter is attached for Syrgis' convenience.

In the September 4, 2009 letter the Department decided not to adjust Syrgis' limits for dilution because the August 2009 report showed no regulated organic parameters were detected in the effluent. However, the March (February) 2009 and 2010 semi-annual reports indicated benzene in the effluent. The August 2010 report listed benzene non-detect at <1.00 µg/l.

In reference to the telephone conversation (Torrence and Wages) on February 22, 2010, Syrgis appears to have no processes which contribute zinc to the wastewater. In reference to the Department's letter dated September 4, 2009, find this option:

Option 1: Syrgis may discontinue all testing of the drinking water after May 2010. Syrgis metal concentrations in the effluent must not exceed by 20% the highest previous reported metal potable concentration. If Syrgis reports a concentration higher than this value or an ADEQ lab report shows a value higher than this value, the Department will deem that Syrgis has violated the 40CFR414 categorical pretreatment standard for zinc or lead.

Syrgis reported the following concentrations of lead and zinc in the intake water:

Date	Lead	Zinc
08-10-2009	< 40 µg/l	89 µg/l
11-02-2009	48 µg/l	23000 µg/l
01-14-2010	2.25 µg/l	66.6 µg/l
07-07-2010	4.20 µg/l	112 µg/l

August 6, 2010
Page 2 of 2

Find attached Appendix V – Domestic Pollutant Loadings from EPA Local Limits Development Guidance Appendices (EPA 833-R-04-002B). EPA sampled 638 residential/commercial trunklines (sewer lines) throughout the USA. Even though the drinking water had been contaminated by residential/commercial plumbing, the maximum reported concentration was only 1280 µg/l. Therefore, the Department has concluded that the 23000 µg/l of zinc is an “outlier” caused by lab error or inadvertent contamination. Note also that the average value reported by EPA was 231 µg/l. The EPA average is comparable to the 112 µg/l of zinc reported by Syrgis.

In accordance with Option 1 above, Syrgis limits for Lead and Zinc are:

$$\begin{aligned}\text{Lead} &\Rightarrow 48 + 48 \times 0.2 = 48 + 9.6 = 57.6 \text{ } \mu\text{g/l} \\ \text{Zinc} &\Rightarrow 112 + 112 \times 0.2 = 112 + 22.4 = 134.4 \text{ } \mu\text{g/l}\end{aligned}$$

The Department appreciates Syrgis’ assistance with determining these limits.

If Syrgis has concerns or requires more details, please contact Rufus Torrence at (501) 682-0626 or torrence@adeq.state.ar.us.

Sincerely,

Rufus J. Torrence, Water Division Engineer

Encl: ADEQ Letter dated 9-4-2009



United Initiators SPI, Inc.

334 Phillips 311 Road
Industrial Park Road
Helena, Arkansas 72342-9033

Customer Service: (800) 786-6722
Customer Service Fax: (800) 987-0845
Phone: (870) 572-2935
Fax: (870) 572-1416

19 December 2012

Arkansas Department of Environmental Quality
Disclosure Statement
Water Division
5301 Northshore Drive
North Little Rock, 72118-5317

Please find enclosed the Arkansas Department of Environmental Quality Disclosure Statement for United Initiators SPI, Inc. Effective November 5, 2012, the corporate name of Syrgis Performance Initiators, Inc. ("SPI") has been formally changed by registration through the Delaware Secretary of State to United Initiators SPI, Inc. Notwithstanding the change of SPI's corporate name, all previous SPI company contractual and other dealings with its customers, vendors and other third parties remain in effect in all respects. Also, the Federal Identification Number utilized previously by SPI shall remain the same.

Please contact Jeff Wages at (870) 572-3297 x307 or by email at jeff.wages@united-in.com if you require additional information.

Sincerely,

Jeff Wages
Regulatory Manager

Enclosures

cc: Jon Cummins, Vice President of Operations



ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY DISCLOSURE STATEMENT

Instructions for the Completion of this Document:

- A. Individuals, firms or other legal entities with no changes to an ADEQ Disclosure Statement, complete items 1 through 5 and 18.**
- B. Individuals who never submitted an ADEQ Disclosure Statement, complete items 1 through 4, 6, 7, and 16 through 18.**
- C. Firms or other legal entities who never submitted an ADEQ Disclosure Statement, complete 1 through 4, and 6 through 18.**

Mail to:
ADEQ
DISCLOSURE STATEMENT
[List Proper Division(s)]
5301 Northshore Drive
North Little Rock, AR 72118-5317

Hand Deliver to:
ADEQ
DISCLOSURE STATEMENT
[List Proper Division (s)]
5301 Northshore Drive
North Little Rock, AR 72118-5317

1. APPLICANT: (Full Name) United Initiators SPI, Inc.
2. MAILING ADDRESS (Number and Street, P.O.Box Or Rural Route) : 334 Phillips 311 Road
3. CITY, STATE, AND ZIPCODE: Helena, AR 72342-9033

4. (check all that apply.)

Individual Corporate or Other Entity

Permit License Certification Operational Authority

New Application Modification Renewal Application (If no changes from previous disclosure statement, complete number 5 and 18.)

Air Water Hazardous Waste Regulated Storage Tank Mining Solid Waste

Environmental Preservation and Technical Service

5. Declaration of No Changes:
The violation history, experience and credentials, involvement in current or pending environmental lawsuits, civil and criminal, have not changed since the last Disclosure Statement I filed with ADEQ on August 23, 2007

Signature of Individual or Authorized Representative of Firm or Legal Entity
(Also complete #18.)

6. Describe the experience and credentials of the Applicant, including the receipt of any past or present permits, licenses, certifications or operational authorization relating to environmental regulation. (Attach additional pages, if necessary.)

EPA ID AR000016899

AFIN: 54-00429

Tracking Number: ARP001013

Permit Tracking number: ARR000303

7. List and explain all civil or criminal legal actions by government agencies involving environmental protection laws or regulations against the Applicant * in the last ten (10) years including:

1. Administrative enforcement actions resulting in the imposition of sanctions;
2. Permit or license revocations or denials issued by any state or federal authority;
3. Actions that have resulted in a finding or a settlement of a violation; and
4. Pending actions.

(Attach additional pages, if necessary.)

* Firms or other legal entities shall also include this information for all persons and legal entities identified in sections 8-16 of this Disclosure Statement.

8. List all officers of the Applicant. (Add additional pages, if necessary.)

NAME: Eduard Hoozemans TITLE: President
STREET: United Initiators GmbH & Co. KG, Dr.-Gustav-Adolph-Str. 3
CITY, STATE, ZIP: 82049 Pullach

NAME: Johannes Ziegler TITLE: Secretary and Treasurer
STREET: 555 Garden St.
CITY, STATE, ZIP: Elyria, OH 44035

NAME: Jon Cummins TITLE: Vice President of Operations
STREET: 334 Phillips 311 Road
CITY, STATE, ZIP: Helena, AR 72342-9033

9. List all directors of the Applicant. (Add additional pages, if necessary.)

NAME: Eduard Hoozemans TITLE: President
STREET: United Initiators GmbH & Co. KG, Dr.-Gustav-Adolph-Str. 3
CITY, STATE, ZIP: 82049 Pullach

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

10. List all partners of the Applicant. (Add additional pages, if necessary.)

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

11. List all persons employed by the Applicant in a supervisory capacity or with authority over operations of the facility subject to this application.

NAME: Jeff Wages TITLE: Regulatory Manager
STREET: 334 Phillips 311 Road
CITY, STATE, ZIP: Helena, AR 72342-9033

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

12. List all persons or legal entities, who own or control more than five percent (5%) of the Applicant's debt or equity.

NAME: United Initiators SPI, Inc TITLE: _____
STREET: Corporation Trust CTR, 1209 Orange St.
CITY, STATE, ZIP: Wilmington, DE 19801

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

13. List all legal entities, in which the Applicant holds a debt or equity interest of more than five percent (5%).

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

14. List any parent company of the Applicant. Describe the parent company's ongoing organizational relationship with the Applicant.

NAME: _____
STREET: _____
CITY, STATE, ZIP: _____

Organizational Relationship:

15. List any subsidiary of the Applicant. Describe the subsidiary's ongoing organizational relationship with the Applicant.

NAME: _____
STREET: _____
CITY, STATE, ZIP: _____

Organizational Relationship:

16. List any person who is not now in compliance or has a history of noncompliance with the environmental laws or regulations of this state or any other jurisdiction and who through relationship by blood or marriage or through any other relationship could be reasonably expected to significantly influence the Applicant in a manner which could adversely affect the environment.

NAME: _____ TITLE: _____

STREET: _____

CITY, STATE, ZIP: _____

NAME: _____ TITLE: _____

STREET: _____

CITY, STATE, ZIP: _____

17. List all federal environmental agencies and any other environmental agencies outside this state that have or have had regulatory responsibility over the Applicant.

US EPA

18. VERIFICATION AND ACKNOWLEDGEMENT

The Applicant agrees to provide any other information the director of the Arkansas Department of Environmental Quality may require at any time to comply with the provisions of the Disclosure Law and any regulations promulgated thereto. The Applicant further agrees to provide the Arkansas Department of Environmental Quality with any changes, modifications, deletions, additions or amendments to any part of this Disclosure Statement as they occur by filing an amended Disclosure Statement.

DELIBERATE FALSIFICATION OR OMISSION OF RELEVANT INFORMATION FROM DISCLOSURE STATEMENTS SHALL BE GROUNDS FOR CIVIL OR CRIMINAL ENFORCEMENT ACTION OR ADMINISTRATIVE DENIAL OF A PERMIT, LICENSE, CERTIFICATION OR OPERATIONAL AUTHORIZATION.

State of Arkansas

County of Phillips

I, Jon Cummins, swear and affirm that the information contained in this Disclosure Statement is true and correct to the best of my knowledge, information and belief.

APPLICANT SIGNATURE: [Handwritten Signature]

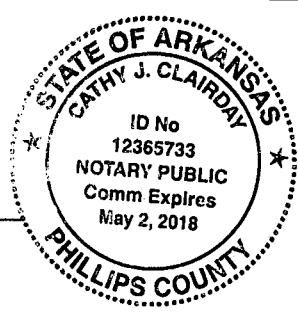
COMPANY TITLE: Vice President of Operations

DATE: 12-20-2012

SUBSCRIBED AND SWORN TO BEFORE ME THIS 20th DAY OF December 20 12

Cathy J. Clairday
NOTARY PUBLIC

MY COMMISSION EXPIRES: 5-2-2018



8. List all officers of the Applicant. (Add additional pages, if necessary.)

NAME: Douglas Hubbard TITLE: Vice President of Sales
STREET: 334 Phillips 311 Road
CITY, STATE, ZIP: Helena, AR 72342-9033

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

9. List all directors of the Applicant. (Add additional pages, if necessary.)

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

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CITY, STATE, ZIP: _____

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STREET: _____
CITY, STATE, ZIP: _____

NAME: _____ TITLE: _____
STREET: _____
CITY, STATE, ZIP: _____

From:

United Initiators SPI, Inc.
334 Phillips 311 Road
Helena, AR 72342-9033

Attn: Jeff Wages

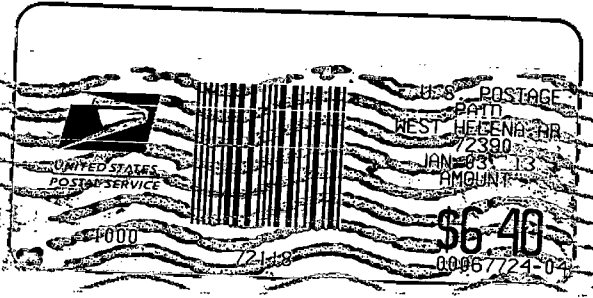
PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL™



HELENA AR 72342-9033

7008 3230 0001 6224 3335 JAN 2013



Mail to:

ADEQ
DISCLOSURE STATEMENT
Water Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

Henderson, Katie

From: Torrence, Rufus
Sent: Wednesday, August 04, 2010 8:33 AM
To: 'Jeff Wages (jwages@syrgis.com)'
Subject: AFIN 54-00092 ARP001013 Syrgis' Limits for Lead and Zinc
Attachments: LTR SGS 20090904.1.doc; Domestic Pollutant Loadings.png



August 6, 2010

Mr. Jeff Wages
Syrgis Performance Initiators, Inc.
334 Phillips 311 Road
Helena, AR 72342-9033

Re: Syrgis 2010 August Semi-Annual Pretreatment Report
(Tracking Number: ARP001013 AFIN: 54-00429 City of Helena NPDES No.: AR0043389)

Dear Mr. Wages:

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In the September 4, 2009 letter the Department decided not to adjust Syrgis' limits for dilution because the August 2009 report showed no regulated organic parameters were detected in the effluent. However, the March (February) 2009 and 2010 semi-annual reports indicated benzene in the effluent. The August 2010 report listed benzene non-detect at <1.00 µg/l.

In reference to the telephone conversation (Torrence and Wages) on February 22, 2010, Syrgis appears to have no processes which contribute zinc to the wastewater. In reference to the Department's letter dated September 4, 2009, find this option for the 40 CFR 403.15 credit:

Option 1: Syrgis may discontinue all testing of the drinking water after May 2010. Syrgis metal concentrations in the effluent must not exceed by 20% the highest previous reported metal potable concentration. If Syrgis reports a concentration higher than this value or an ADEQ lab report shows a value higher than this value, the Department will deem that Syrgis has violated the 40CFR414 categorical pretreatment standard for zinc or lead.

Syrgis reported the following concentrations of lead and zinc in the intake water:

Date	Lead	Zinc
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Find attached Appendix V – Domestic Pollutant Loadings from EPA Local Limits Development Guidance Appendices (EPA 833-R-04-002B). EPA sampled 638 residential/commercial trunklines (sewer lines) throughout the USA. Even though the drinking water had been contaminated by residential/commercial plumbing and various waste, the maximum reported concentration was only 1280 µg/l. Therefore, the Department has concluded that the 23000 µg/l of zinc is an “outlier” caused by lab error or inadvertent contamination. Note also that the average value reported by EPA was 231 µg/l. The EPA average is comparable to the 112 µg/l of zinc reported by Syrgis.

In accordance with Option 1 above, Syrgis limits for Lead and Zinc are:

$$\text{Lead} \Rightarrow 48 + 48 \times 0.2 = 48 + 9.6 = 57.6 \mu\text{g/l}$$

$$\text{Zinc} \Rightarrow 112 + 112 \times 0.2 = 112 + 22.4 = 134.4 \mu\text{g/l}$$

The Department appreciates Syrgis’ assistance with determining these limits.

If Syrgis has concerns or requires more details, please contact Rufus Torrence at (501) 682-0626 or torrence@adeq.state.ar.us.


Sincerely,



Rufus Torrence,
ADEQ Water Division Engineer

Attachments: ADEQ Letter dated September 4, 2009

Appendix V / EPA Local Limits Development Guidance Appendices

Pretreatment Industrial Inspection Facility Information	
Facility Name: United Initiators SPI, Inc.	Site Address: 334 Phillips 311 Road Helena, AR 72342-9033
Signatory Authority (Name & Title): Jon Cummins, Plant Manager	
Phone: (870) 572-2935-307	Mailing Address (if different):
Fax: (870) 572-1416	(Same)
Address: (Same)	Corporate Owner Name and address (if applicable):
(Same)	Eduard Hoozemans, President
Mobile Phone: 870-995-3443	United Initiators GmbH & Co. KG, Dr.-
Fax: (Same)	Gustav-Adolph-Str.3
Contact Person (Name & Title):	82049 Pullach (see attached disclosure for more details)
Jeff Wages	Corporate Secy & Treas: Johannes Ziegler
e-mail: jeff.wages@united-in.com	555 Gardens St. Elyria, OH 44035
Facility Permit # ARP001013	Last Inspection Date: July 15, 2009
POTW (City) IU discharges to: Helena WWTP	POTW's NPDES # AR0043389
Industrial Classification: <input checked="" type="checkbox"/> Categorical <input type="checkbox"/> Significant	AFIN 54-00429
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 414.85	
Table of Contents	
I. Summary of Inspection	Page of
A. Inspection Objectives	
B. Inspection Analysis	
II. Pre-Inspection Meeting	Page of
A. General Information	
B. Facility Permits	
C. Additional Comments	
III. Attachments "Yes" indicates item exists at the facility and attachments will be included "No" indicates item does not exist at the facility and attachments aren't necessary	
A. Industrial Processes	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page of
B. Pollution Prevention Activities	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page of
C. Pretreatment System	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page of
D. Chemical Storage	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page of
E. Spill/Slug Control Plan	yes <input type="checkbox"/> no <input checked="" type="checkbox"/> Page of
F. Self-Monitoring	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page of
Comments : The Limits for Lead and Zinc have been revised by ADEQ; see letter dated August 6, 2010.	
Sub part H – Specialty Organic Chemicals	
Inspector's Name (Print): Rufus Torrence	Signature: 
IU Rep's Name (Print) Jeff Wages	Signature: (Not Required)
Date and Time Inspection Ended: July 17, 2013 @ 11:45 am	

I. Summary of Inspection			
A. Inspection and Objective (Complete Before Inspection)			
<input type="checkbox"/> Permit Renewal	<input checked="" type="checkbox"/> Bi-Annual	<input type="checkbox"/> Spill/Slug	<input type="checkbox"/> Unscheduled
<input type="checkbox"/> New Construction	<input type="checkbox"/> Noncompliance	<input type="checkbox"/> Follow-up	<input type="checkbox"/> Complaint
Inspection Objective(s)			
Compliance Assurance			
Checklist of items to be reviewed and/or visually inspected:			
<input checked="" type="checkbox"/> Pre-inspection Meeting	<input type="checkbox"/> Permit Conditions	<input type="checkbox"/> Safety Concerns	
<input checked="" type="checkbox"/> Process Inspection	<input checked="" type="checkbox"/> Pretreatment Process	<input type="checkbox"/> TOMP	
<input checked="" type="checkbox"/> Chemical Storage	<input checked="" type="checkbox"/> Discharge point(s)	<input type="checkbox"/> Spills/Slug Control Plan	
<input type="checkbox"/> Records Review	<input type="checkbox"/> RCRA information	<input type="checkbox"/> Process/Flow/Pretreatment Schematics	
<input type="checkbox"/> IU sampling procedures	<input type="checkbox"/> Flow/pH Meter(s)	<input type="checkbox"/> Calibration Records	
<input type="checkbox"/> MSDS Inventory List	<input type="checkbox"/> New MSDS	<input type="checkbox"/>	
Comments:			
B. Inspection Analysis			
Were there any deficiencies/violations identified and noted during the inspection? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Provide a brief narrative of deficiencies/violations or other concerns in the following areas:			
Records Review			
Process Area(s)			
Pretreatment System			
Self Monitoring Procedures			
Diversion/Sewer Meters			
Spill/Slug Control Plan			
Sampling Point			
Chemical Storage			

II. Pre-Inspection Meeting			
A. General Information			
Date and Time Inspection Started: July 17, 2013 @ 9:40 am		SIC code(s): 2869	
IU Reps/Titles Jeff Wages, EHS Coor		Control Authority Reps/Titles Rufus Torrence, Engineer	
End product(s): Organic Peroxides (MEKP and BPO)		Approx. # of units produced: 3602 tons/year	
Days of Operation: Monday thru Thursday		Days of Production (if different): (Same)	
Hours of Operation: 16 hrs/day		Hours of Production (if different): (Same)	
Shift 1, hrs.: 6 am to 4 pm	Shift 2, hrs.: 1 pm to 10 pm		
# of Employees: 46	Peak Mos.: May	"Off" Mos.: December	
Are there any scheduled plant shutdowns? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If yes, when? Last 2 weeks / year			
Are there designated plant clean-up days? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> If yes, when?			
Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
If No, explain:			
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>			
If Yes, explain:			
Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: <input type="checkbox"/> Yes. <input checked="" type="checkbox"/> No			
If Yes, explain:			
Has there been any changes since the last inspection regarding the following items:			
Plant/flow/process layout? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, obtain copy of updated schematic for facility file.			
Processes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Production Levels? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If yes, explain: Slight seasonal decrease			
Raw materials? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain:			
Flow rates? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, explain			
Are regulated and non-regulated wastestreams combined? yes <input type="checkbox"/> no <input checked="" type="checkbox"/>			
Prior to Pretreatment System? yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A <input type="checkbox"/>			
If Yes, was the CWF used to calculate limits? yes <input type="checkbox"/> no <input type="checkbox"/>			
Prior to connection to the POTW sanitary sewer? yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A <input type="checkbox"/>			
At connection to sanitary sewer? yes <input type="checkbox"/> no <input checked="" type="checkbox"/> N/A <input type="checkbox"/>			
Production and flows verified for Production-Based Standards? yes <input type="checkbox"/> no <input type="checkbox"/> N/A <input checked="" type="checkbox"/>			
What is the current avg. production rate and process flow?			
Production Rate is not applicable; the process flow remains consistent.			
Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? yes <input type="checkbox"/> no <input type="checkbox"/>			
Not Applicable			

Attachment A: Industrial Process(es)			
List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not			
1. MEK Peroxide	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	4.	Yes <input type="checkbox"/> No <input type="checkbox"/>
2. Benzoyl Peroxide	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	5.	Yes <input type="checkbox"/> No <input type="checkbox"/>
3.	Yes <input type="checkbox"/> No <input type="checkbox"/>	6.	Yes <input type="checkbox"/> No <input type="checkbox"/>
Were processes visually inspected? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>			
Brief description of process(es):			
Manufacture of MEK peroxide and benzoyl peroxide.			
Benzoyl Peroxide is a hardener or "initiator" in the plastic industry.			
General observations of facility's indoor housekeeping: Good			
General observations of area outside facility's building: Good			
Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured (M) or estimated (E). If batch (B) discharged, list frequency and volume (1000 gal/month, e.g.).			
<input type="checkbox"/> Process Rinse Overflows	<input type="checkbox"/> Equip. Cleanup	<input type="checkbox"/> Floor Cleanup	<input type="checkbox"/> Spent Bath Solutions
<input type="checkbox"/> Product Cleaning	<input type="checkbox"/> Forklifts Maint./Wash	<input type="checkbox"/> Tank Dragout	<input type="checkbox"/> Air Pollution Devices
<input checked="" type="checkbox"/> Boiler Blowdown 100 + gpd	<input type="checkbox"/> Spent Rinse Tanks	<input type="checkbox"/> Equipment Coolants	<input checked="" type="checkbox"/> Non-Contact Cooling Water
<input type="checkbox"/> Stormwater	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
List Major Raw Materials and Chemicals used:			
Methyl Ethyl Ketone, Hydrogen Peroxide, Sulfuric Acid, Demethyl Phthalate & Benzoyl Chloride			
Check Waste Stream Pollutants of Concern from Process(es)			
<input type="checkbox"/> BOD	<input checked="" type="checkbox"/> CN ⁻	<input checked="" type="checkbox"/> Metals (List) Lead and Zinc	<input type="checkbox"/> Solvents (List)
<input type="checkbox"/> TSS	<input type="checkbox"/> Cl ₂		
<input type="checkbox"/> O&G	<input type="checkbox"/> S ⁻		
<input type="checkbox"/> pH	<input checked="" type="checkbox"/>	Toxic Organic	
Are there floor drains in the Process area? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If yes list number and the location of all floor drains:			
None of the floor drains have access to the POTW directly; all wastewater is pumped to the treatment pond.			

Attachment B: Pollution Prevention (P2) / Recycling Activities

Does the facility have a written P2 Plan?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Does this facility practice P2?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Environmental Management System in place?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
ISO Certified?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> ISO 9001
Written Standard Operating Procedures?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Preventative Maintenance Program	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (hydraulic systems, valves, pumps, etc)
Explain:		
Water Reuse:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Cost Accounting to Track Savings:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Explain:		
Inventory Control / "Green Purchasing":	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> (lean manufacturing/"env. friendly purchasing", etc)
Explain:		
Employee Training:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Spent Solvent Reclamation?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Recycle Paper, Aluminum, Boxes, and Pallets?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Explain:		
Recycle Waste Oil, Solvents, and Lubricants?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Explain:		
Other Activities		
P2 Equipment/Practices in use:		
<input checked="" type="checkbox"/> Overflow Alarms	<input type="checkbox"/> Aqueous Cleaning Solutions	
<input type="checkbox"/> Fog Spray Rinsing	<input type="checkbox"/> Countercurrent Rinsing	
<input type="checkbox"/> Dragout Collection Trays	<input type="checkbox"/> Seal-Less Pumps	
<input type="checkbox"/> Air Jets to Blow Parts Dry	<input type="checkbox"/> Secondary Containment of Process Solutions	
<input type="checkbox"/> Aqueous Paint Stripping Solutions	<input type="checkbox"/> Bead Blasting to Remove Paint	
<input type="checkbox"/> Water Soluble Cutting Fluids	<input type="checkbox"/> Recycle Overspray	
<input type="checkbox"/> In-Process Recycle (Ion Exchange, Reverse Osmosis)	<input type="checkbox"/> Conductivity Meters	
<input type="checkbox"/> Dead Rinse Tanks	<input type="checkbox"/> Bath / Rinse Filtration	

Attachment C: Pretreatment System

Are wastestreams segregated before pretreatment? Yes No N/A
 Are they pretreated prior to discharge to the sanitary sewer? Yes No N/A
 Was the pretreatment system visually inspected during this visit? Yes¹ No N/A

¹ Syrgis has a number of small clarifiers near process bldgs., all wastewater enters ponds prior to discharge to POTW.

Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:

<input type="checkbox"/> Dissolved air floatation	<input type="checkbox"/> Membrane Tech.	<input type="checkbox"/> Ion Exchange	<input type="checkbox"/> Biological Treatment
<input type="checkbox"/> Centrifugation	<input type="checkbox"/> Flow Equalization	<input type="checkbox"/> Ozonation	<input type="checkbox"/> Chlorinating
<input type="checkbox"/> Chemical Precipitation	<input type="checkbox"/> Oil/Water Separation	<input type="checkbox"/> Reverse Osmosis	<input type="checkbox"/> Grit Removal
<input type="checkbox"/> Sludge Filter Press	<input type="checkbox"/> Grease Trap	<input type="checkbox"/> Screen	<input type="checkbox"/> Solvent Separation
<input type="checkbox"/> pH Adjustment	<input type="checkbox"/> Sand Trap	<input type="checkbox"/> Sedimentation	<input type="checkbox"/> Silver Recovery
<input type="checkbox"/> Belt/Disk Oil Skimmer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):

Two ponds...First pond is a settling pond Second pond is a "polishing" pond.

Does the description match the schematic currently on file? Yes No N/A

System Operator(s) Name:

Not Applicable

Does discharge permit require licensed operator? Yes No N/A

Is the System Operator(s) licensed by the State of Arkansas (per Reg. # 3?) Yes No N/A

List Name(s) and License classification:

Is training provided to the Pretreatment System Operator(s)? Yes No N/A

If Yes, list type and frequency:

Is the discharge from the Pretreatment System? Batch Continuous Combination

If any discharges are batch type or combination, describe the following:

Volume of each batch: _____ gallons per _____

Describe process from which batch originated (spent bath, e.g.):

Approximate duration of batch discharge:

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
Not Applicable		

Attachment D: Chemical Storage Area(s)		
Does the facility have a designated chemical storage area(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Was this area(s) visually inspected? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. MEKP¹	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
2. Benzoyl Peroxide¹	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
3.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
4.	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Pretreatment <input type="checkbox"/> Sanitary Sewer <input type="checkbox"/> Storm Sewer
Does the Chemical Storage Area(s) contain any of the following?		
<input checked="" type="checkbox"/> Dikes, Berms for Containment	<input type="checkbox"/> Plugs for Floor Drains	
<input type="checkbox"/> Secondary Tanks for Holding	<input type="checkbox"/> Premix (low) Concentrations	
<input type="checkbox"/> Alarms	<input type="checkbox"/> Chain restraints, limited access	
<input type="checkbox"/> Spills Control Kits for Cleanup	<input type="checkbox"/> Notification Procedures	
<input type="checkbox"/> Chemical desegregation within Storage Area	<input type="checkbox"/> Other	
Chemical Inventory List (MSDS) on file? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
Were any new MSDS reviewed during the Inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A		
If yes, list below:		
Chemical storage comments:		
¹Syrgis is primarily a chemical company so chemicals are stored over the entire plant but Syrgis does have a bulk storage area: other storage areas are scattered over acreage and the areas are isolated for safety reasons.		
Earth berms prevent surface run-off.		
Chemical handling procedures (totes, dolly, buckets, hardline, etc):		
Pumps and Piping		

Attachment E: Spill/Slug Control Plan	
Does the facility have a Spill/Slug control plan?	<input type="checkbox"/> yes <input checked="" type="checkbox"/> no ²
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(A) Describes discharge practices including non routine batch (slug) discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(B) Describes storage and handling of chemicals	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(C) Procedures for immediate notification to POTW of slug discharges	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
2. Describes procedures and equipment for emergency response	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
3. Describes follow-up to limit damage suffered by POTW or environment	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	<input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A
If no:	
Does the facility have Spill/Slug Notification Procedures posted?	<input type="checkbox"/> yes <input type="checkbox"/> no
Is it posted in areas where chemicals are used and stored?	<input type="checkbox"/> yes <input type="checkbox"/> no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	<input type="checkbox"/> yes <input type="checkbox"/> no
Have there been any non-routine, episodic discharges or chemical spills in the past year?	<input type="checkbox"/> yes <input type="checkbox"/> no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? <input type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> N/A	
Visual Inspection of Discharge Lines/Points	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point	Discharge from Polishing Pond
Total Flow Monitoring Point	Estimated using city water meter
Upstream Manhole	
Point of Connection:	

² Spill Plan is not applicable to this facility. There is no central plant area; the facility has scattered “satellite” plants with on direct access to the POTW.

Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title.

Refer to ADEQ letter dated August 12, 2011 for sampling procedure.

Where is the sample point located?

<input type="checkbox"/> End of Process	<input checked="" type="checkbox"/> Pretreatment Effluent	<input type="checkbox"/> Total Flow
<input type="checkbox"/> Combined Flow	<input type="checkbox"/> Metered Flow	<input type="checkbox"/> Flow Actuator
<input type="checkbox"/> Private Manhole	<input type="checkbox"/> Utility Manhole	<input type="checkbox"/> Advance Notice Required
<input type="checkbox"/> Safety Hazards Identified	<input type="checkbox"/>	<input type="checkbox"/>

Is the Sample Collection Site Adequate? Yes No N/A

Does the facility rep. request a split sample on this sampling/inspection? Yes No

Does the facility perform self-monitoring tests in-house? Yes No N/A

If no, record the name and address of Contract Lab: **Rineco Analytical Services (subletted to Env Testing & Cons, Inc)**

Automatic Sampler or Manual

IU Self-Monitoring Results reviewed: Yes No N/A

Is the Contract Lab certified by ADEQ for test parameters? Yes No N/A

Dates and Times of Sample Analysis Recorded? Yes No N/A

Correct Methods Used for Test Analysis (Refer To 40CFR Part 136) Yes No N/A

EPA recommended holding times being met (Refer to 40CFR Part 136) Yes No N/A

Chain of Custody Records for Self-Monitoring Samples Reviewed Yes No N/A

Were correct Sample Types Collected Yes No N/A

Dates and times of Sample Collection Recorded? Yes No N/A

Were Samples preserved correctly (refer to 40CFR Part 136) Yes No N/A

Were Self Monitoring records on file for past 3 years? Yes No N/A

List the parameters the facility monitors and the frequency:

<input type="checkbox"/> Cd(t)	<input type="checkbox"/> Cu(t)	<input type="checkbox"/> Cr(t)	<input type="checkbox"/> Ni(t)	<input checked="" type="checkbox"/> Pb(t) 2 per year
<input type="checkbox"/> Ag(t)	<input checked="" type="checkbox"/> Zn(t) 2 per year	<input type="checkbox"/> pH	<input type="checkbox"/> CN(t)	<input type="checkbox"/> CN(a-c)
<input checked="" type="checkbox"/> TTO-Vol 2 per year	<input checked="" type="checkbox"/> TTO-B/N 2 per year	<input checked="" type="checkbox"/> TTO-A.E. 2 per year	<input checked="" type="checkbox"/> TTO-Pest 2 per year	<input type="checkbox"/> Cr(hex)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433

How does the IU report TTO? Analysis Certification Statement

Does the facility have a Toxic Organic Management Plan? Yes No N/A

If yes, Does the plan show how toxic organics are used, stored, and disposed? Yes No N/A

List the date of the last revision to the TOMP:

Is the TOMP being followed as written? Yes No N/A (If no, provide explanation in comments.)

If no, is there evidence that a TOMP is needed? Yes No N/A (If yes, provide description of evidence in comments.)

Comments:



5301 Northshore Drive
North Little Rock, AR 72118
Telephone: 501-682-0744

Client Report For: Syrgis Performance Initiators, Inc. CSI 2013 2551
Attention:
Client Address:

,

Report Date: August 02, 2013
LAB ID: AR13JUL18-02
Comment:

Approved By: _____

Date: August 02, 2013

Client: CSI	Client Sample ID: SGS
Lab ID: 2013-2551	Collection Date: 7/17/2013 11:24:00 AM
	Matrix: Water

Analyses

<i>Total Metals by EPA 200.8</i>	<i>EPA 200.8</i>	<i>Batch: 13080111 Run: 1</i>			
	<u>Result</u>	<u>Reporting Limit</u>	<u>MDL</u>	<u>Qual</u>	<u>Unit</u>
Aluminum	<10000	10000	20		ug/L
Antimony	<5000	5000	5		ug/L
Arsenic	<500	500	0.5		ug/L
Barium	<5000	5000	2.0		ug/L
Beryllium	<250	250	0.1		ug/L
Boron	<12500	12500	5.0		ug/L
Cadmium	<500	500	0.3		ug/L
Calcium	<20	20	0.04		mg/L
Chromium	<500	500	0.3		ug/L
Cobalt	<500	500	0.5		ug/L
Copper	<500	500	0.5		ug/L
Iron	<10000	10000	10.0		ug/L
Lead	<500	500	0.1		ug/L
Magnesium	<50	50	0.1		mg/L
Manganese	<500	500	0.2		ug/L
Nickel	<1250	1250	0.5		ug/L
Potassium	1180	500	0.05		mg/L
Selenium	<1000	1000	0.5		ug/L
Silver	<2500	2500	1.0		ug/L
Sodium	37600	20	0.02		mg/L
Thallium	<1250	1250	0.05		ug/L
Vanadium	<1250	1250	1.0		ug/L
Zinc	<1500	1500	2.0		ug/L
Dilution Factor	500				
Analyzed By	Robert Graddy				
Analysis Date/Time	Aug 1 2013 11:52AM				
Prep By					
Prep Date/Time					

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr
Ruehr@adeq.state.ar.us
501-682-0955