## Wilson, Tabatha

**From:** Torrence, Rufus
**Sent:** Wednesday, September 04, 2013 8:26 AM
**To:** Jeff Wages (Jeff.Wages@united-in.com)
**Cc:** Wilson, Tabatha
**Subject:** AR0043389 AFIN 54-00429 SPI August 2013 Semi-Annual Report
**Attachments:** SPI Aug 2013 SAR.pdf

ADEQ
ARKANSAS
Department of Environmental Quality

September 3, 2013

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

Re: SPI's August 2013 Semi-Annual Report
(Permit No. AR0043389 AFIN 54-00429)

Dear Mr. Wages:

The Department has reviewed SPI's August 2013 Semi-annual Pretreatment Report and the report is complete.

The Department appreciates SPI'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

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALIT
5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118 5317 / TELEPHONE 5
www.adeq.state.ar.us

# SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR414

Return to: Water Div/NPDES Pretreatment

## (1) IDENTIFYING INFORMATION

| A. LEGAL NAME & MAILING ADDRESS | B. FACILITY & LOCATION ADDRESS |
|---|---|
| **United Initiators SPI, Inc.**<br>**334 Phillips 311 Road**<br>**Helena, AR 72342-9033** | **United Initiators SPI, Inc.**<br>**334 Phillips 311 Road**<br>**Helena, AR 72342-9033** |
| C. FACILITY CONTACT: **Jeff Wages** | TELEPHONE NUMBER: **870.572.2935.307** |

## (2) REPORTING PERIOD

| A. MONTHS WHICH REPORTS ARE DUE | B. PERIOD COVERED BY THIS REPORT |
|---|---|
| **February** & **August** | FROM: **February 2013** TO: **August 2013** |

## (3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

Specify Category and Sub-Categor(ies)

Check each applicable Subpart

- : Subpart A--General
- 9 Subpart B--Rayon Fibers
- 9 Subpart C--Other Fibers
- 9 Subpart D--Thermoplastic Resins
- 9 Subpart E--Thermosetting Resins
- 9 Subpart F--Commodity Organic Chemicals
- 9 Subpart G--Bulk Organic Chemicals
- ☑ Subpart H--Specialty Organic Chemicals

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.

United Initiators Aug 2013 SAR
AR00 43389
AFIN 54-00429
Filedate 20130903
Non-Pret CIUs
Pret Cities IUs

C. Number of Regular Employees at this Facility **48**

## (4) FLOW MEASUREMENT

A. Total Plant Flow to POTW in Gallons per Day

Average: **45,315** gpd Maximum: **49,877** gpd

(4) Con'd Next Page

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UNITED INITIATORS
driving your success

# 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

August 27, 2013

RECEIVED
AUG 29 2013
By 11520 TW

Mr. Rufus J. Torrence
ADEQ NPDES Pretreatment Engineer
Arkansas Department of Environmental Quality
Water Division
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Dear Mr. Torrence:

In accordance with 40 CFR Part 403.12(e) industrial users with processes regulated by categorical pretreatment standards (40 CFR Part 414, et al), please find enclosed our most recent monitoring report for the wastewater discharged from the United Initiators SPI, Inc. facility in Helena, Arkansas. During the sampling period, we were discharging approximately 45,000 gallons of water per day based on previous monthly use averages.

Please contact me by phone at 870.572.2935 ext. 307 or by e-mail at jeff.wages@united-in.com if you have any questions or require additional information regarding this report.

Respectfully,

Jeff Wages
Regulatory Manager

Enclosures

cc:
Jon Cummins – United Initiators SPI
Terry McGinister – Helena WWTP

## 40CFR414 SEMI-ANNUAL REPORT CON'D FACILITY NAME: _____

### (4) FLOW MEASUREMENT (CON'D)

B. INDIVIDUAL PROCESS FLOWS IN GALLONS PER DAY

| Process | Average Flow Rate (gpd) | Maximum Flow Rate (gpd) | Type of Discharge (Batch, etc) |
|---|---|---|---|
| Regulated | 44,600 | 49,090 | |
| Unregulated* | | | |
| Cooling Water | | | |
| Sanitary | 715 | 787 | |

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

### (5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

G Neutralization
G Chemical Precipitation and Sedimentation
☑ Biological
G Cyanide Destruction
G Other _____
G None

B. COMMENTS ON TREATMENT SYSTEM

**Two aerated ponds with a total surface area of ~6.5 acres.**

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS ON 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. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

TABULATE THE FOLLOWING INFORMATION ON PAGE 3

AEC Ψ AVERAGE EQUIVALENT CONCENTRATION

Sample Location Pond 2 effluent

Sample Type (Grab or Composite) Composite & Grab per testing requirements

Number of Samples and Frequency Collected 2/Semiannually

40CFR136 Preservation and Analytical Methods Use: ☑ Yes G No

D. WAS THE COMBINED WASTESTREAM FORMULA USED TO DETERMINE ALTERNATE LIMITS? ☑ Yes G No

## 40CFR414 SEMI-ANNUAL REPORT CON'D FACILITY NAME:

| Pollutant | AEC | MEC | AMAC | AMMC |
|---|---|---|---|---|
| Benzene | 56 ug/L | 132 ug/L | 8.66 ug/L | 8.66 ug/L |
| Carbon Tetrachloride | 140 ug/L | 374 ug/L | <1.00 ug/L | <1.00 ug/L |
| Chlorobenzene | 140 ug/L | 374 ug/L | <1.00 ug/L | <1.00 ug/L |
| 1,2,4 - Trichlorobenzene | 193 ug/L | 781 ug/L | <50.0 ug/L | <50.0 ug/L |
| Hexachlorobenzene | 193 ug/L | 781 ug/L | <50.0 ug/L | <50.0 ug/L |
| 1,2 - Dichloroethane | 177 ug/L | 565 ug/L | <1.00 ug/L | <1.00 ug/L |
| 1,1,1 - Trichloroethane | 22 ug/L | 58 ug/L | <1.00 ug/L | <1.00 ug/L |
| Hexachloroethane | 193 ug/L | 781 ug/L | <50.0 ug/L | <50.0 ug/L |
| 1,1 - Dichloroethane | 22 ug/L | 58 ug/L | <1.00 ug/L | <1.00 ug/L |
| 1,1,2 - Trichloroethane | 31 ug/L | 125 ug/L | <1.00 ug/L | <1.00 ug/L |
| Chloroethane | 108 ug/L | 290 ug/L | <1.00 ug/L | <1.00 ug/L |
| Chloroform | 109 ug/L | 320 ug/L | <1.00 ug/L | <1.00 ug/L |
| 1,2 - Dichlorobenzene | 193 ug/L | 781 ug/L | <1.00 ug/L | <1.00 ug/L |
| 1,3 - Dichlorobenzene | 140 ug/L | 374 ug/L | <1.00 ug/L | <1.00 ug/L |
| 1,4 - Dichlorobenzene | 140 ug/L | 374 ug/L | <1.00 ug/L | <1.00 ug/L |
| 1,1 - Dichloroethylene | 22 ug/L | 59 ug/L | <1.00 ug/L | <1.00 ug/L |
| 1,2 - trans - Dichloroethylene | 25 ug/L | 65 ug/L | <1.00 ug/L | <1.00 ug/L |
| 1,2 - Dichloropropane | 193 ug/L | 781 ug/L | <1.00 ug/L | <1.00 ug/L |
| 1,3 - Dichloropropylene | 193 ug/L | 781 ug/L | <1.00 ug/L | <1.00 ug/L |
| Ethylbenzene | 140 ug/L | 374 ug/L | 1.04 ug/L | 1.04 ug/L |
| Methylene Chloride | 35 ug/L | 167 ug/L | <10.0 ug/L | <10.0 ug/L |
| Methyl Chloride | 108 ug/L | 290 ug/L | <1.00 ug/L | <1.00 ug/L |
| Hexachlorobutadiene | 140 ug/L | 374 ug/L | <50.0 ug/L | <50.0 ug/L |
| Nitrobenzene | 2202 ug/L | 6301 ug/L | <50.0 ug/L | <50.0 ug/L |
| 2 - Nitrophenol | 64 ug/L | 227 ug/L | <50.0 ug/L | <50.0 ug/L |
| 4 - Nitrophenol | 159 ug/L | 567 ug/L | <200 ug/L | <200 ug/L |
| 4,6 - Dinitro-o-cresol | 77 ug/L | 273 ug/L | <100 ug/L | <100 ug/L |
| Tetrachloroethylene | 51 ug/L | 161 ug/L | 1.55 ug/L | 1.55 ug/L |
| Toluene | 28 ug/L | 73 ug/L | 6.75 ug/L | 6.75 ug/L |
| Trichloroethylene | 26 ug/L | 68 ug/L | <1.00 ug/L | <1.00 ug/L |
| Vinyl Chloride | 95 ug/L | 169 ug/L | <1.00 ug/L | <1.00 ug/L |
| Total Cyanide | 413 ug/L | 1181 ug/L | <10 ug/L | <10 ug/L |
| Total Lead | 57.6 ug/L | 57.6 ug/L | <5.00ug/L | <5.00ug/L |
| Total Zinc | 134.4 ug/L | 134.4 ug/L | 101ug/L | 101ug/L |

**40CFR414 SEMI-ANNUAL REPORT CON'D FACILITY NAME:** _____

(7) GENERAL COMMENTS

See attached procedure used for sampling and compositing waste water samples taken from the three United Initiators SPI processes to be analyzed for lead and zinc. ETC Report Number: 13-220-0206 analysis results correspond to the waste water sample taken utilizing this procedure.

(8) SIGNATORY REQUIREMENTS

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.

**Jon Cummins**
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

**Vice President of Operations**
OFFICIAL TITLE

8/28/2013
DATE SIGNED

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driving your success

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Industrial Park Road
Helena, Arkansas 72342-9033

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## Procedure for determining percent of each process for composite sample to be analyzed for lead and zinc

The amount/percent of waste water from each of the three United Initiators SPI process water samples to be contributed to the composite sample of all three processes was determined by dividing the average daily discharge of each process by the total average daily discharge of the entire facility.

| | August 2013 Report | | | |
|---|---|---|---|---|
| Composite sample by percent of process wastewater for zinc and lead analysis | | | | |
| | | | | |
| **Process** | **BPO** | **MEKP** | **MIBKP** | **Total** |
| **Average GPD** | 27920 | 16547 | 134 | 44600 |
| **% of Total** | 0.626 | 0.371 | 0.003 | |
| | | | | |
| **Water Usage** | **from 7/9/2012** | | **to 12/10/2012** | |
| Average Regulated GPD | | 42,409 | | |
| | | | | |
| | **BPO process discharge** | | | |
| | 26,548/42,409 | | 62.6% | |
| | | | | |
| | **MEKP process discharge** | | | |
| | 15,734/42,409 | | 37.1% | |
| | | | | |
| | **MIBKP process discharge** | | | |
| | 127/42,409 | | 0.3% | |

## Compositing Procedure

Three sample containers are used to collect 500 milliliters of waste water from each of the three Syrgis processes. One container is used for each separate process. Each container is labeled with the process name from which it was taken, i.e., BPO, MIBKP, and MEKP.

The three waste water samples are taken to the R&D Lab. 313 milliliters of the BPO process waste water sample are placed into the composite sample container. 185.5 milliliters of the MEKP process waste water sample is placed into the composite sample container. 1.5 milliliters of the MIBKP waste water sample is placed into the composite sample container. The composite sample container is sealed and shipped to United Initiators SPI's analytical service provider for analysis.