

Henderson, Katie

From: Torrence, Rufus
Sent: Thursday, September 13, 2012 1:40 PM
To: Jeff Wages (jwages@syrgis.com)
Cc: Henderson, Katie
Subject: FW: AFIN 54-00429 AR0043389 ARP001013 Syrgis Performance Initiators August 2012 Semi-Annual Report..Repeated Zinc Analysis Due
Attachments: SGS Aug 2012 SAR.pdf



September 11, 2012

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

Re: Syrgis 2012 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 2012 semi-annual report. In accordance with the terms in the Department's letter dated August 6, 2010, Syrgis appears to be **non-compliant** with the calculated limit for zinc. The calculated limit for zinc is 132 µg/l. Syrgis reported 264 µg/l for zinc in the "effluent".

Referring to the Department's letter dated August 12, 2011, find:

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 composited sample to the lab for analysis.

Referring to the telephone conversation on March 6, 2012 (see below), Syrgis sampled the pond effluent for the February 2012 report. The ETC analysis dated 7-9-2012 indicated after the heading, "Sample ID:", the term

“Effluent”. The ETC analysis dated 7-30-2012 indicated that the “City Water” had only 62.8 µg/l of zinc. Based on these two observations, Syrgis appears to have sampled the pond effluent again. However, because the submitted results indicated a “violation”, in accordance with 40 CFR 403.12(g)(2), Syrgis must resample the process water to verify compliance. **Please be careful (1) to sample the three process lines and (2) to composite the sample in proportion to flow.**

Syrgis must submit the sampling analysis results to ADEQ along with supporting documented compositing procedure. Please submit the calculation sheet which shows how Syrgis determined the percentages. This may be a handwritten page, an Excel spreadsheet or a formal tabulated form. In either case, the submitted item must clearly show how Syrgis determined the percentages.

Please submit the lab results and the calculation information within thirty days of receiving this letter/email or by **November 1, 2012** (whichever comes first). In the future, please submit the calculation information with each semi-annual report.

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 March 6, 2012 and e-mail dated March 06, 2012 2:39 pm

From: Torrence, Rufus
Sent: Tuesday, March 06, 2012 2:39 PM
To: Jeff Wages (jwages@syrgis.com)
Cc: Henderson, Katie; Fuller, Kim
Subject: RE: AFIN 54-00429 AR0043389 ARP001013 Syrgis Performance Initiators: Process Water Analysis (Zinc)

Jeff,

In reference to our telephone conversation today, Syrgis sampled the pond effluent for the February 2012 report. Therefore, no calculation sheet is available for the February report.

Syrgis has agreed to sample the three process lines for future reports. Syrgis next report is due by August 31, 2012.

Rufus

From: Torrence, Rufus
Sent: Tuesday, March 06, 2012 1:41 PM
To: Jeff Wages (jwages@syrgis.com)
Cc: Henderson, Katie
Subject: AFIN 54-00429 AR0043389 ARP001013 Syrgis Performance Initiators: Process Water Analysis (Zinc)



ARKANSAS
Department of Environmental Quality

March 6, 2012

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

Re: Syrgis 2012 February Semi-Annual Pretreatment Report
(Tracking Number: ARP001013 AFIN: 54-00429 City of Helena NPDES No.: AR0043389)

Dear Mr. Wages:

The Department has reviewed Syrgis' February 2012 semi-annual report. In accordance with the terms in the Department's letter dated August 6, 2010, Syrgis appears to be compliant with the calculated effluent limits for lead and zinc. The calculated limit for lead is 57.6 µg/l and for zinc is 132 µg/l. Syrgis reported 1.24 µg/l for lead and 45.7 µg/l for zinc in the effluent.

Referring to the Department's letter dated August 12, 2011, find:

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.

The Department cannot verify that the submitted lead and zinc analyses were composited samples. Please submit the calculation sheet which shows how Syrgis determined the percentages. This may be a handwritten page, an Excel spreadsheet or a formal tabulated form. In either case, the submitted item must clearly show how Syrgis determined the percentages.

Please submit the calculation information within thirty days of receiving this letter/email or by **April 20, 2012** (whichever comes first). In the future, please submit the calculation information with each semi-annual report.

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, 8-6-2010 and 8-12-2011

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5001 NORTHSHORE DRIVE • NORTH LITTLE ROCK, ARKANSAS 72118 5317 • TELEPHONE 501 687-0744 / FAX 501 687 0880
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 Syrgis Performance Initiators 334 Phillips 311 Road Helena, AR 72342-9033	B. FACILITY & LOCATION ADDRESS Syrgis Performance Initiators 334 Phillips 311 Road Helena, AR 72342-9033
C. FACILITY CONTACT: Jeff Wages	TELEPHONE NUMBER: 870.995.2935.307
(2) REPORTING PERIOD	
A. MONTHS WHICH REPORTS ARE DUE <u>February</u> & <u>August</u>	B. PERIOD COVERED BY THIS REPORT FROM: February 2012 TO: August 2012
(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 <input checked="" type="checkbox"/> 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. AFIN 54-00429 AR 00 43389 ARP 00 1013 C. Number of Regular Employees at this Facility <u>48</u>
(4) FLOW MEASUREMENT	
A. Total Plant Flow to POTW in Gallons per Day Average: <u>45,801</u> gpd Maximum: <u>47,320</u> gpd	
(4) Con'd Next Page	



PERFORMANCE INITIATORS

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

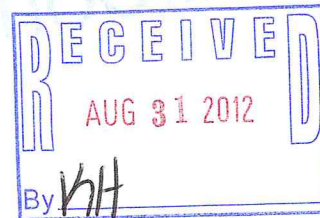
Syrgis Performance Initiators, Inc.

AR P001013
54-~~00092~~
00429

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

August 27, 2012

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 Syrgis Performance Initiators, 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 iwages@syrgis.com if you have any questions or require additional information regarding this report.

Sincerely,

Jeff Wages
Regulatory Manager

Enclosures

cc:
Jon Cummins - Syrgis
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	45,086	46581	
Unregulated*			
Cooling Water			
Sanitary	715	739	

*"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	<1.00 ug/L	<1.00 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	782 ug/L	<50.00 ug/L	<50.00 ug/L
Hexachlorobenzene	193 ug/L	782 ug/L	<50.00 ug/L	<50.00 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	782 ug/L	<50.00 ug/L	<50.00 ug/L
1,1 - Dichloroethane	22 ug/L	58 ug/L	<1.00 ug/L	<1.00 ug/L
1,1,2 - Trichloroethane	32 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	782 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	782 ug/L	<1.00 ug/L	<1.00 ug/L
1,3 - Dichloropropylene	193 ug/L	782 ug/L	<1.00 ug/L	<1.00 ug/L
Ethylbenzene	140 ug/L	374 ug/L	<1.00 ug/L	<1.00 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	6302 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	<1.00 ug/L	<1.00 ug/L
Toluene	28 ug/L	73 ug/L	<5.00 ug/L	<5.00 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	0.840 ug/L	0.840 ug/L
Total Zinc	134.4 ug/L	134.4 ug/L	264 ug/L	264 ug/L



ENVIRONMENTAL TESTING & CONSULTING, INC.

2790 Whitten Road

Memphis, Tennessee 38133

(901) 213-2400

Fax (901) 213-2440

"A Laboratory Management Partner"

05424

Rineco Analytical Services

Ms. Mia Dixon

P O Box 729

Benton , AR 72018

Project Syrgis Performance Initiators, Inc.
Information :

Report Date : 7/9/2012

Report Number : **12-180-0229**

REPORT OF ANALYSIS

Received : 6/28/2012

Lab No : **91117**

Sample ID : **Effluent**

Matrix: **Aqueous**

Sampled: **6/27/2012 14:00**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Lead	0.840	µg/L	0.500	1	07/02/12 18:10	RQE	EPA-200.8
Total Zinc	264	µg/L	100	20	07/06/12 13:55	RQE	EPA-200.8

Qualifiers/ Definitions

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor

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

(7) GENERAL COMMENTS

Composite sample by percent of process wastewater for zinc and lead analysis

Process	BPO	MEKP	MIBKP	Total
Average GPD	28,224	16,727	135.26	45,086
% of Total	0.626	0.371	0.003	

Maximum GPD	28,414	17,235	932	46,581
% of Total	0.61	0.37	0.02	

Potable Water Sample
7/24/2012

Total Lead 3.20 ug/L
Total Zinc 62.8 ug/L

(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

Plant Manager

OFFICIAL TITLE

DATE SIGNED

08-30-2012



ENVIRONMENTAL TESTING & CONSULTING, INC.

www.etcmemphis.com

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Memphis, Tennessee 38133

(901) 213-2400

Fax (901) 213-2440

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Rineco Analytical Services

Ms. Mia Dixon

P O Box 729

Benton, AR 72018

Project Syrgis Potable Water
Information :

Report Date : 7/30/2012

Report Number : **12-207-0316**

REPORT OF ANALYSIS

Received : 7/25/2012

Lab No : **96463**

Matrix: **Aqueous**

Sample ID : **City Water**

Sampled: **7/24/2012 7:15**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Lead	3.20	µg/L	0.500	1	07/27/12 16:42	RQE	EPA-200.8
Total Zinc	62.8	µg/L	5.00	1	07/27/12 16:42	RQE	EPA-200.8

Qualifiers/ Definitions

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor