

**Peltier, Hannah**

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**From:** Torrence, Rufus  
**Sent:** Tuesday, March 05, 2013 12:29 PM  
**To:** Jeff Wages (jwages@syrgis.com)  
**Cc:** Peltier, Hannah  
**Subject:** AFIN 54-00429 AR0043389 ARP001013 United Initiators February 2013 Semi-Annual Pretreatment Report  
**Attachments:** UIS Feb 2013 SAR.pdf



ARKANSAS  
Department of Environmental Quality

March 5, 2013

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

Re: United Initiators 2013 February Semi-Annual Pretreatment Report  
(Tracking Number: ARP001013 AFIN: 54-00429 City of Helena NPDES No.: AR0043389)

Dear Mr. Wages:

The Department has reviewed United Initiators' February 2013 semi-annual report and the report is complete. In accordance with the terms in the Department's letter dated August 6, 2010, the Helena facility is compliant with the calculated limits for lead and zinc. The calculated limit for lead is 57.6 µg/l and for zinc is 134.4 µg/l.

The Department appreciates United Initiators' efforts in demonstrating compliance with pretreatment standards.

If United Initiators has concerns or requires more details, please contact Rufus Torrence at (501) 682-0626 or [torrence@adeq.state.ar.us](mailto:torrence@adeq.state.ar.us).

Sincerely,

Rufus J. Torrence, Water Division Engineer

Encl: United Initiators February 2013 Report

ARKANSAS DEPARTMENT OF ENV  
5301 NORTHSIDE DRIVE / NORTH LITTLE ROCK / ARKANSAS 7211  
www.adem.state

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

Return to: Water Div/NPDES Pretreatment

<b>(1) IDENTIFYING INFORMATION</b>	
<b>A. LEGAL NAME &amp; MAILING ADDRESS</b>  <b>United Initiators SPI, Inc.</b> <b>334 Phillips 311 Road</b> <b>Helena, AR 72342-9033</b>	<b>B. FACILITY &amp; LOCATION ADDRESS</b>  <b>United Initiators SPI, Inc.</b> <b>334 Phillips 311 Road</b> <b>Helena, AR 72342-9033</b>
<b>C. FACILITY CONTACT: Jeff Wages</b>	
<b>TELEPHONE NUMBER: 870.995.2935.307</b>	
<b>(2) REPORTING PERIOD</b>	
<b>A. MONTHS WHICH REPORTS ARE DUE</b>  <u>February</u> & <u>August</u>	<b>B. PERIOD COVERED BY THIS REPORT</b>  <b>FROM: August 2012</b> <b>TO: February 2013</b>
<b>(3) DESCRIPTION OF OPERATION</b>	
<b>A. REGULATED PROCESSES</b>  <b>CORE PROCESS(ES)</b>  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>B. CHANGES:</b> 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.  <div style="text-align: center; font-size: 2em; font-family: cursive;">OK</div>  Feb 2013 SAR Filedate 2013 0304 AR 00 433 89 ARP 00 1013 ① "Non-Pret City CIUs" updated ② "ANPCAN"  <b>C. Number of Regular Employees at this Facility</b> <u>48</u>
<b>(4) FLOW MEASUREMENT</b>	
<b>A. Total Plant Flow to POTW in Gallons per Day</b>  Average: <u>43,124</u> gpd      Maximum: <u>52,014</u> gpd	
<b>(4) Con'd Next Page</b>	

**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	42,409	51,152	
Unregulated*			
Cooling Water			
Sanitary	715	863	

\*"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	20.7 ug/L	20.7 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	<100 ug/L	<100 ug/L
Hexachlorobenzene	193 ug/L	781 ug/L	<100 ug/L	<100 ug/L
1,2 - Dichloroethane	177 ug/L	564 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	<100 ug/L	<100 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	102 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	<100 ug/L	<100 ug/L
Nitrobenzene	2200 ug/L	6296 ug/L	<100 ug/L	<100 ug/L
2 - Nitrophenol	64 ug/L	227 ug/L	<100 ug/L	<100 ug/L
4 - Nitrophenol	159 ug/L	566 ug/L	<400 ug/L	<400 ug/L
4,6 - Dinitro-o-cresol	77 ug/L	272 ug/L	<200 ug/L	<200 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	1180 ug/L	<10 ug/L	<10 ug/L
Total Lead	57.6 ug/L	57.6 ug/L	<2.50 ug/L	<2.50 ug/L
Total Zinc	134.4 ug/L	134.4 ug/L	102 ug/L	102 ug/L

(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: 13-016-0233 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

02-26-2013

DATE SIGNED

## 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.

February 2013 Report				
Composite sample by percent of process wastewater for zinc and lead analysis				
<b>Process</b>	<b>BPO</b>	<b>MEKP</b>	<b>MIBKP</b>	<b>Total</b>
<b>Average GPD</b>	26,548	15,734	127	42,409
<b>% of Total</b>	0.626	0.371	0.003	
<b>Water Usage</b>	<b>from 7/9/2012</b>		<b>to 12/10/2012</b>	
Average Regulated GPD	42,409			
<b>BPO process discharge</b>				
	26,548/42,409		62.6%	
<b>MEKP process discharge</b>				
	15,734/42,409		37.1%	
<b>MIBKP process discharge</b>				
	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.



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

February 20, 2013

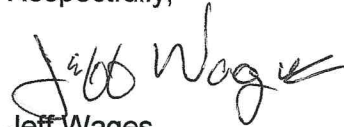
Mr. Rufus J. Torrence  
ADEQ NPDES Pretreatment Engineer  
Arkansas Department of Environmental Quality  
Water Division  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

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 43,000 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](mailto:jeff.wages@united-in.com) if you have any questions or require additional information regarding this report.

Respectfully,

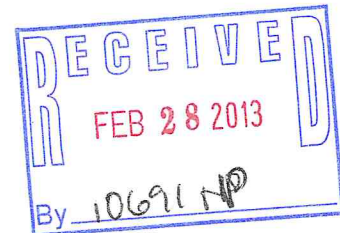


Jeff Wages  
Regulatory Manager

Enclosures

cc:

Jon Cummins – United Initiators SPI  
Terry McGinister – Helena WWTP







# ENVIRONMENTAL TESTING & CONSULTING, INC.

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Memphis, Tennessee 38133

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Rineco Analytical Services

Ms. Mia Dixon

P O Box 729

Benton , AR 72018

Project United Initiators SPI, Inc.

Information : United Process (3)

Wastewater

Report Date : 01/23/2013

Received : 1/16/2013

*Randall H. Thomas*

Report Number : **13-016-0233**

## REPORT OF ANALYSIS

Randy Thomas  
Project Manager

Lab No : **94968**

Sample ID : **3 Process Wastewater**

Matrix: **Aqueous**

Sampled: **1/14/2013 15:45**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Lead	<2.50	µg/L	2.50	5	01/21/13 16:08	ACS	EPA-200.8
Total Zinc	<b>102</b>	µg/L	100	20	01/22/13 14:25	ACS	EPA-200.8

### Qualifiers/ Definitions

\*

MQL

Outside QC limit

Method Quantitation Limit

DF

Dilution Factor