

From: [Gilliam, Allen](#)
To: [jeff_wages](#)
Cc: [Burrow, Kealey](#); helenawater@sbcglobal.net; jon.cummins@united-in.com; anthony.arnold@united-in.com
Subject: AR0043389_United Initiators ARP001013 August 2015 semi annual Pretreatment report_20150812
Date: Wednesday, October 14, 2015 10:30:17 AM
Attachments: [Certification Statement 1507.pdf](#)
[CFR 414 semi annual report 1507.pdf](#)
[Process Water Sampling 15-148-0204 20150529 report far 3484809-006.PDF](#)
[United Initiators SPL Inc 15-132-0264 20150522 report far 3477377-366.PDF](#)
[Wastewater Composite SOP 1507.pdf](#)

Jeff,

United Initiators' August 2015 semi-annual Pretreatment report was received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e). Compliance with the Federal standards in 40 CFR 414.111 could not be fully determined because several regulated parameters' analyticals were non-detect "<" at levels above the regulatory limits.

Please consult with your contract lab to understand and explain why (matrix interference?) the lab had to dilute the samples at a factor as high of 50 to find a method quantitation level. Is there any way your contract lab can determine what the matrix interferences are and remove them avoiding the high dilution factors?

This office noted on the lab report for the Semi-volatile Organic Compounds using the GC/MS Method 625, "Sample required an initial dilution due to the high level of the non-target analyte Benzoic Acid". The Volatile Organic Compounds had no such "non-target analyte" mentioned requiring dilution of samples, just "sample matrix".

Thank you for your timely report

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

cc: Terry McGinister, Helena General Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Wages Jeff
Sent: Monday, July 27, 2015 9:23 AM
To: gilliam@adeq.state.ar.us
Cc: Cummins Jon <jon.cummins@united-in.com>; Arnold Anthony <anthony.arnold@united-in.com>
Subject: United Initiators Wastewater Report August 2015

Dear Mr. Gilliam,

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 attached our most recent monitoring report for the wastewater discharged from the United Initiators, Inc. facility in Helena, Arkansas. Also attached are two sets of wastewater analytical results and some supplemental information.

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.

Best Regards,

Jeff Wages

Regulatory Manager

Phone : +1 (870) 572-3297 Ext. 307

Fax: +1 (870) 572-1416

Mobile: +1 (870) 995-3443

jeff.wages@united-in.com

UNITED INITIATORS, INC
334 Phillips 311 Road
Helena, AR 72342

www.united-initiators.com

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	40,818	48,158	Batch & continuous
Unregulated*			
Cooling Water			
**Sanitary	730	861	

*"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

Two aerated ponds with a total surface area of ~6.5 acres.
**** Sanitary plus dilution from rain water equals ~0.92.**

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.

CFR 414	PSES and PSNS Limits (ug/l)		Measured Max	
	**Max for any 1 day	**Max for any monthly avg	for any 1 day (ug/l)	for any monthly avg (ug/l)
Effluent characteristics				
Acenaphthene	43	18	<100	<100
Anthracene	43	18	<100	<100
Benzene	124	53	2.14	2.14
Bis(2-ethylhexyl) phthalate	238	88	<500	<500
Carbon Tetrachloride	351	131	<1.00	<1.00
Chlorobenzene	351	131	<1.00	<1.00
Chloroethane	272	102	<1.00	<1.00
Chloroform	300	103	<1.00	<1.00
Di-n-butyl phthalate	40	18	<250	<250
1,2-Dichlorobenzene	733	181	<250	<250
1,3-Dichlorobenzene	351	131	<250	<250
1,4-Dichlorobenzene	351	131	<250	<250
1,1-Dichloroethane	54	20	<1.00	<1.00
1,2-Dichloroethane	530	166	<1.00	<1.00

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

1,1-Dichloroethylene	55	20	<1.00	<1.00
1,2-trans-Dichloroethylene	61	23	<1.00	<1.00
1,2-Dichloropropane	733	181	<1.00	<1.00
1,3-Dichloropropylene	733	181	<1.00	<1.00
Diethyl phthalate	104	42	<250	<250
Dimethyl phthalate	43	18	<250	<250
4,6-Dinitro-o-cresol	256	72	<500	<500
Ethylbenzene	351	131	<1.00	<1.00
Fluoranthene	50	20	<100	<100
Fluorene	43	18	<100	<100
Hexachlorobenzene	733	181	<250	<250
Hexachlorobutadiene	351	131	<250	<250
Hexachloroethane	733	181	<250	<250
Methyl Chloride	272	102	<1.00	<1.00
Methylene Chloride	157	33	<10.0	<10.0
Naphthalene	43	18	<100	<100
Nitrobenzene	5,912	2,066	<250	<250
2-Nitrophenol	213	60	<250	<250
4-Nitrophenol	532	150	<1000	<1000
Phenanthrene	43	18	<100	<100
Pyrene	44	18	<100	<100
Tetrachloroethylene	151	48	<1.00	<1.00
Toluene	68	26	<5.00	<5.00
Total Cyanide	1,108	388	8.00	8.00
Total Lead	57.6	57.6	<6	<6
Total Zinc ²	134.4	134.4	57	57
1,2,4-Trichlorobenzene	733	181	<250	<250
1,1,1-Trichloroethane	54	20	<1.00	<1.00
1,1,2-Trichloroethane	117	30	<1.00	<1.00
Trichloroethylene	64	24	<1.00	<1.00
Vinyl Chloride	159	90	<1.00	<1.00

(7) GENERAL COMMENTS

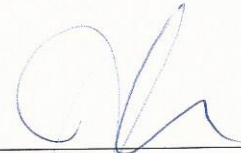
See attached procedure used for sampling and compositing waste water samples taken from the three United Initiators, Inc. processes to be analyzed for lead and zinc. ETC Report Number: 15-148-0204 analysis results correspond to the waste water sample taken utilizing this procedure.

(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

7-27-2015

DATE SIGNED

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

7/22/2015

Allen Gilliam
ADEQ State Pretreatment Coordinator
Water Division
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Dear Mr. Gilliam:

I certify under penalty of law that 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.

Sincerely,



Jon Cummins
Vice President of Operations

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' 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 2015 Report				
Composite sample by percent of process wastewater for zinc and lead analysis				
Process	BPO	MEKP	MIBKP	Total
Average GPD	25,552	15,143	123	40,818
% of Total	0.626	0.371	0.003	

Compositing Procedure

Three sample containers are used to collect 500 milliliters of waste water from each of the three United 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' analytical service provider for analysis.

5/22/2015

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton, AR, 72018

Ref: Analytical Testing
ETC Report Number: 15-132-0264
Client Project Description: United Initiators, SPI, Inc.
Semi-annual Sampling

Dear Ms. Mia Dixon:

Environmental Testing and Consulting, Inc. received sample(s) on 5/12/2015 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method.

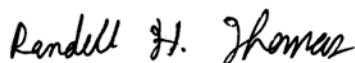
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2012) and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

Per EPA Methods Update Rule (May 2012), all methods from Standard Methods for the Examination of Water and Wastewater are reported to include the year of approval.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an as-received basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,



Randy Thomas
Project Manager

Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.

Alabama #40750	Louisiana #04015	VA NELAP #460181	Texas #T104704180-11-6	Arkansas #88-0650
Mississippi	California #2904	NC #415	Oklahoma #9311	Virginia #00106
Kentucky #90047	Tennessee #TN02027	EPA #TN00012	Kentucky UST #41	Kansas #E-10396



Client: Rineco Analytical Services
Project: United Initiators, SPI, Inc.
Lab Report Number: 15-132-0264
Date: 5/22/2015

CASE NARRATIVE**Volatile Organic Compounds - GC/MS Method EPA-624**

Sample 92829 (Grab)

QC Batch No: L240518

Surrogate was flagged for recovery outside QC limits in this project sample. This sample was re-analyzed for verification, at dilution with recovery within limits. Batch QC samples (method blank and laboratory control samples) all showed surrogates within QC limits indicating that the recovery was due to sample matrix. The data was not affected.

Semivolatile Organic Compounds - GC/MS Method EPA-625

Sample 92830 (Composite 5/11-12/15)

QC Batch No: L240999

Sample required an initial dilution due to the high level of the non-target analyte Benzoic Acid- .

QC Batch No: L240999

Surrogate(s) flagged for recovery outside QC limits in this project sample due to a required dilution. The dilution factor resulted in surrogate concentration(s) below the minimum detectable level. Batch QC samples (method blank and laboratory control samples) all showed surrogates within QC limits.



05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 05/22/2015
Received : 5/12/2015

Report Number : **15-132-0264**

REPORT OF ANALYSIS

Lab No : **92829**
Sample ID : **Grab**

Matrix: **Aqueous**
Sampled: **5/12/2015 11:50**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	8.00	µg/L	5.00	1	05/13/15 08:20	GHD	4500CNE-2011

Qualifiers/ Definitions

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor

05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton, AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 05/22/2015
Received : 5/12/2015

Report Number : **15-132-0264**

REPORT OF ANALYSIS

Lab No : **92829**
Sample ID : **Grab**

Matrix: **Aqueous**
Sampled: **5/12/2015 11:50**

Analytical Method: 624

Prep Method: EPA-624 (PREP)

Prep Batch(es): L240511

Date/Time Prepped: 5/14/2015 09:42:00

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Batch
Benzene	2.14	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
Carbon Tetrachloride	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
Chlorobenzene	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
Chloroethane	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
Chloroform	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
Methyl Chloride	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
1,1-Dichloroethane	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
1,2-Dichloroethane	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
1,1-Dichloroethylene	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
1,2-trans-Dichloroethylene	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
1,2-Dichloropropane	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
cis-1,3-Dichloropropene	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
trans-1,3-Dichloropropene	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
1,3-Dichloropropylene	<1.00	µg/L	1.00	1	05/14/15 14:23		L240518
Ethylbenzene	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
Methylene Chloride	<10.0	µg/L	10.0	1	05/14/15 14:23	SEB	L240518
Tetrachloroethylene	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
Toluene	<5.00	µg/L	5.00	1	05/14/15 14:23	SEB	L240518
1,1,1-Trichloroethane	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
1,1,2-Trichloroethane	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
Trichloroethylene	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518

Qualifiers/ * Outside QC limit
Definitions MQL Method Quantitation Limit

DF Dilution Factor



05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 05/22/2015
Received : 5/12/2015

Report Number : **15-132-0264**

REPORT OF ANALYSIS

Lab No : **92829**
Sample ID : **Grab**

Matrix: **Aqueous**
Sampled: **5/12/2015 11:50**

Analytical Method: 624

Prep Method: EPA-624 (PREP)

Prep Batch(es): L240511

Date/Time Prepped: 5/14/2015 09:42:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Vinyl Chloride	<1.00	µg/L	1.00	1	05/14/15 14:23	SEB	L240518
Surrogate: 4-Bromofluorobenzene	102		Limits: 71-131%	1	05/14/15 14:23	SEB	L240518
Surrogate: Dibromofluoromethane	81.4		Limits: 70-128%	1	05/14/15 14:23	SEB	L240518
Surrogate: 1,2-Dichloroethane - d4	124		Limits: 67-136%	1	05/14/15 14:23	SEB	L240518
Surrogate: Toluene-d8	101		Limits: 70-130%	1	05/14/15 14:23	SEB	L240518

Qualifiers/ Definitions

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor



05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 05/22/2015
Received : 5/12/2015

Report Number : **15-132-0264**

REPORT OF ANALYSIS

Lab No : **92830**

Matrix: **Aqueous**

Sample ID : **Composite 5/11-12/15**

Sampled: **5/12/2015 0:00**

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Method
Total Lead	<5.00	µg/L	5.00	10	05/21/15 00:27	CGC	EPA-200.8
Total Zinc	<100	µg/L	100	20	05/21/15 14:06	CGC	EPA-200.8

Qualifiers/ Definitions

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor



05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 05/22/2015
Received : 5/12/2015

Report Number : **15-132-0264**

REPORT OF ANALYSIS

Lab No : **92830**
Sample ID : **Composite 5/11-12/15**

Matrix: **Aqueous**
Sampled: **5/12/2015 0:00**

Analytical Method: 625

Prep Method: 625

Prep Batch(es): L240559

Date/Time Prepped: 5/15/2015 14:00:00

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Batch
Acenaphthene	<100	µg/L	100	50	05/20/15 09:48	NFP	L240999
Anthracene	<100	µg/L	100	50	05/20/15 09:48	NFP	L240999
Bis(2-ethylhexyl)phthalate	<500	µg/L	500	50	05/20/15 09:48	NFP	L240999
1,2-Dichlorobenzene	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
1,3-Dichlorobenzene	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
1,4-Dichlorobenzene	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
Diethyl phthalate	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
Dimethyl phthalate	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
Di-n-butyl phthalate	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
4,6-Dinitro-o-cresol	<500	µg/L	500	50	05/20/15 09:48	NFP	L240999
Fluoranthene	<100	µg/L	100	50	05/20/15 09:48	NFP	L240999
Fluorene	<100	µg/L	100	50	05/20/15 09:48	NFP	L240999
Hexachlorobenzene	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
Hexachlorobutadiene	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
Hexachloroethane	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
Naphthalene	<100	µg/L	100	50	05/20/15 09:48	NFP	L240999
Nitrobenzene	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
2-Nitrophenol	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
4-Nitrophenol	<1000	µg/L	1000	50	05/20/15 09:48	NFP	L240999
Phenanthrene	<100	µg/L	100	50	05/20/15 09:48	NFP	L240999
Pyrene	<100	µg/L	100	50	05/20/15 09:48	NFP	L240999

Qualifiers/Definitions

*	Outside QC limit
ML	Method Quantitation Limit

DF Dilution Factor



05424

Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

Project United Initiators, SPI, Inc.
Information : Semi-annual Sampling

Report Date : 05/22/2015
Received : 5/12/2015

Report Number : **15-132-0264**

REPORT OF ANALYSIS

Lab No : **92830**

Matrix: **Aqueous**

Sample ID : **Composite 5/11-12/15**

Sampled: **5/12/2015 0:00**

Analytical Method: 625

Prep Method: 625

Prep Batch(es): L240559

Date/Time Prepped: 5/15/2015 14:00:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
1,2,4-Trichlorobenzene	<250	µg/L	250	50	05/20/15 09:48	NFP	L240999
Surrogate: 2-Fluorobiphenyl	25.6 *		Limits: 38-107%	50	05/20/15 09:48	NFP	L240999
Surrogate: 2-Fluorophenol	10.2		Limits: 8-88%	50	05/20/15 09:48	NFP	L240999
Surrogate: Nitrobenzene-d5	18.5 *		Limits: 29-105%	50	05/20/15 09:48	NFP	L240999
Surrogate: Phenol-d6	12.0		Limits: 7-58%	50	05/20/15 09:48	NFP	L240999
Surrogate: 4-Terphenyl-d14	50.1		Limits: 30-130%	50	05/20/15 09:48	NFP	L240999
Surrogate: 2,4,6-Tribromophenol	49.3		Limits: 16-138%	50	05/20/15 09:48	NFP	L240999

**Qualifiers/
Definitions**

* Outside QC limit
MQL Method Quantitation Limit

DF Dilution Factor

Cooler Receipt Form

Customer Number: **05424**

Customer Name: **Rineco Analytical Services**

Report Number: **15-132-0264**

Shipping Method

Fed Ex US Postal Lab Other :
 UPS Client Courier Thermometer ID:

Shipping container/cooler uncompromised? Yes No

Number of coolers received

Custody seals intact on shipping container/cooler? Yes No Not Required

Custody seals intact on sample bottles? Yes No Not Required

Chain of Custody (COC) present? Yes No

COC agrees with sample label(s)? Yes No

COC properly completed Yes No

Samples in proper containers? Yes No

Sample containers intact? Yes No

Sufficient sample volume for indicated test(s)? Yes No

All samples received within holding time? Yes No

Cooler temperature in compliance? Yes No

Cooler/Samples arrived at the laboratory on ice.
Samples were considered acceptable as cooling process had begun. Yes No

Water - Sample containers properly preserved Yes No N/A

Water - VOA vials free of headspace Yes No N/A

Trip Blanks received with VOAs Yes No N/A

Soil VOA method 5035 – compliance criteria met Yes No N/A

High concentration container (48 hr) Low concentration EnCore samplers (48 hr)

High concentration pre-weighed (methanol -14 d) Low conc pre-weighed vials (Sod Bis -14 d)

Special precautions or instructions included? Yes No

Comments:

Any regulatory non-compliance issues will be recorded on non-compliance report.

Signature:

Date & Time:



ENVIRONMENTAL TESTING & CONSULTING, INC.

2790 Whitten Road Memphis, Tennessee 38133 (901) 213-2400 Fax (901) 213-2440

CHAIN OF CUSTODY



15-132-0264
05424
05-12-2015
14:32:16

Rineco Analytical Services
United Initiators, SPI, Inc.

Company Name Rineco Analytical Services		Customer Number 05424		Telephone (501) 778-9089		RUSH	ICE	
Site Name United Initiators, SPI, Inc.			Project Comment				FID Number	
Project Rineco - Semi-annual			Project Number		PO Number			
Project Manager / Contact Rineco Analytical Services				E-mail				
Sample ID	Container Type	Collected Date / Time	# Cont	Preservative	Grab / Comp	Matrix	Analyses	
Grab	Glass Vial Amber - 40ml	5-12-15 1:50	3	HCL - Hydrochloric Acid	G	Aqueous	VOC	
Grab	Plastic - Pint	↓ ↓	1	NaOH - Sodium Hydroxide	G	Aqueous	CNT	
Composite	Plastic - Pint	5/12/15	1	HNO3 - Nitric Acid	C	Aqueous	Pb/Zn	
Composite	Glass Amber - Liter	↓ ↓	2	Na2S2O3 - Sodium Thiosulfate	C	Aqueous	SVOC	

Sampled By <i>John D. [Signature]</i>	Method of Shipment Blank / Cooler T4	Temperature 1.7	Remarks <i>[Signature]</i>
Relinquished By (sign)	Date / Time	Received By (sign)	Date / Time
Relinquished By (sign)	Date / Time	Received By (sign)	Date / Time
Relinquished By (sign) <i>[Signature]</i>	Date / Time 14:30 5-12-15	Received by Lab (sign) <i>[Signature]</i>	Date / Time 9:50 5/12/15

5/29/2015

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

Ref: Analytical Testing
ETC Report Number: 15-148-0204
Client Project Description: Process Water Sampling

Dear Mr. Jeff Wages:

Environmental Testing and Consulting, Inc. received sample(s) on 5/28/2015 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method.

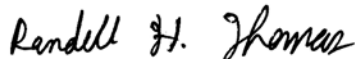
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2012) and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

Per EPA Methods Update Rule (May 2012), all methods from Standard Methods for the Examination of Water and Wastewater are reported to include the year of approval.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an as-received basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,



Randy Thomas
Project Manager

Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.

Alabama #40750	Louisiana #04015	VA NELAP #460181	Texas #T104704180-11-6	Arkansas #88-0650
Mississippi	California #2904	NC #415	Oklahoma #9311	Virginia #00106
Kentucky #90047	Tennessee #TN02027	EPA #TN00012	Kentucky UST #41	Kansas #E-10396





ENVIRONMENTAL TESTING & CONSULTING, INC.

www.etcmemphis.com

2790 Whitten Road

Memphis, Tennessee 38133

(901) 213-2400

Fax (901) 213-2440

"A Laboratory Management Partner"

11985

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

Project Process Water Sampling
Information :

Report Date : 05/29/2015
Received : 5/28/2015

Report Number : **15-148-0204**

REPORT OF ANALYSIS

Randy Thomas
Project Manager

Lab No : **96054**

Sample ID : **#1**

Matrix: **Aqueous**
Sampled: **5/27/2015 9:55**

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Method
Total Lead	<0.006	mg/L	0.006	1	05/29/15 00:39	JTR	EPA-200.7
Total Zinc	0.057	mg/L	0.010	1	05/29/15 00:39	JTR	EPA-200.7

Qualifiers/ Definitions

DF

Dilution Factor

ML

Method Quantitation Limit

Cooler Receipt Form

Customer Number: **11985**

Customer Name: **United Initiators, Inc**

Report Number: **15-148-0204**

Shipping Method

Fed Ex US Postal Lab Other :
 UPS Client Courier Thermometer ID:

Shipping container/cooler uncompromised? Yes No

Number of coolers received

Custody seals intact on shipping container/cooler? Yes No Not Required

Custody seals intact on sample bottles? Yes No Not Required

Chain of Custody (COC) present? Yes No

COC agrees with sample label(s)? Yes No

COC properly completed Yes No

Samples in proper containers? Yes No

Sample containers intact? Yes No

Sufficient sample volume for indicated test(s)? Yes No

All samples received within holding time? Yes No

Cooler temperature in compliance? Yes No

Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun. Yes No

Water - Sample containers properly preserved Yes No N/A

Water - VOA vials free of headspace Yes No N/A

Trip Blanks received with VOAs Yes No N/A

Soil VOA method 5035 – compliance criteria met Yes No N/A

High concentration container (48 hr) Low concentration EnCore samplers (48 hr)
 High concentration pre-weighed (methanol -14 d) Low conc pre-weighed vials (Sod Bis -14 d)

Special precautions or instructions included? Yes No

Comments:

Any regulatory non-compliance issues will be recorded on non-compliance report.

Signature:

Date & Time:



ENVIRONMENTAL TESTING & CONSULTING, INC.

2790 Whitten Road Memphis, Tennessee 38133 (901) 213-2400 Fax (901) 213-2440

CHAIN OF CUSTODY



United Initiators, Inc
Process Water Sampling

15-148-0204
11985
05-28-2015
08:29:17

Company Name United Initiators, Inc		Customer Number 11985	Telephone (870) 572-3297	RUSH	ICE		
Site Name Process Water Sampling		Project Comment Pb, Zn			FID Number		
Project Process Water Sampling		Project Number	PO Number				
Project Manager / Contact United Initiators, Inc			E-mail jeff.wages@united-in.com				
Sample ID	Container Type	Collected Date / Time	# Cont	Preservative	Grab / Comp	Matrix	Analyses
#1	Plastic - Pint	5-27-15 9:55 AM	1	HNO3 - Nitric Acid		Aqueous	Pb, Zn

Sampled By Jeff Wages	Method of Shipment UPS	Blank / Cooler Temperature NA	Remarks
Relinquished By (sign) Jeff Wages	Date / Time 5-27-15 11:00 AM	Received By (sign)	Date / Time
Relinquished By (sign)	Date / Time	Received By (sign)	Date / Time
Relinquished By (sign)	Date / Time	Received by Lab (sign) Danyelle Hill	Date / Time 5/28/15 0745