Peltier, Hannah

Subject: FW: AR0043389_United Initiators ARP00001013 February 2015 semi annual Pretreatment report with ADEQ reply_20150212

From: Gilliam, Allen
Sent: Thursday, February 12, 2015 12:44 PM
To: jeff wages; Cummins Jon
Cc: Fuller, Kim; Peltier, Hannah; helenawater@sbcglobal.net
Subject: AR0043389_United Initiators ARP~~00~~001013 February 2015 semi annual Pretreatment report with ADEQ reply_20150212

Jeff,

United Initiators' February 2015 semi-annual Pretreatment report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically with the Organic Chemicals, Plastics, Synthetic Fibers (40 CFR 414, Subpart H – Specialty Organic Chemicals) Pretreatment standards located in 40 CFR 414.111.

I've reviewed (what little I could find) on Mr. Torrence's rationale/discussion with regards to placing lower limitations on Pb and Zn or your wastewater discharge and cannot find a precedent allowing this to be legally done (page 2 of 2 located in the 8/6/10 letter from Mr. Torrence to Mr. Wages; last attachment above). If you would care to discuss this discrepancy, feel free to contact this office. This office may be missing something in his and your previous conversations in the past.

Thank you for your timely report remaining in compliance with the Federal Pretreatment Regulations in 40 CFR 403.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Terry McGinister, Helena General Manager

E/NPDES/NPDES/Pretreatment/Reports

From: Wages Jeff [mailto:Jeff.Wages@united-in.com]
Sent: Tuesday, February 10, 2015 4:54 PM
To: Gilliam, Allen
Cc: Cummins Jon
Subject: United Initiators Wastewater Report February 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

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"A Laboratory Management Partner"

12/1/2014

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

Ref: Analytical Testing
ETC Report Number: 14-322-0270
Client Project Description: United Initiators, SPI, Inc.
Semi-annual Sampling

Dear Ms. Mia Dixon:

Environmental Testing and Consulting, Inc. received sample(s) on 11/18/2014 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,

Randall H. Thomas

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 **CASE NARRATIVE**
Project: United Initiators, SPI, Inc.
Lab Report Number: 14-322-0270
Date: 12/1/2014

Dimethyl phthalate is being reported down to the method detection limit (MDL) instead of the method quantitation limit (MQL) due to the sample matrix and the regulatory level being 19 ug/L. The MDL is 1.91 ug/l and the MQL is 20 ug/L for this compound.

Semivolatile Organic Compounds - GC/MS Method EPA-625
Sample 97178 (Composite 11/17-18/14)
QC Batch No: L220523
Surrogates were flagged for recoveries in the associated project sample. During the extraction step, the extraction technician noted that a significant emulsion formed. Batch QC samples (Method Blank and Laboratory Control Samples) all showed surrogate recoveries within QC limits, indicating that the low recoveries were due to the sample matrix.

Extraction and Conc. for 625 Method EPA-625 (PREP)
QC Batch No: L220455
The weight/volume extracted was reduced during the extraction procedure due to the nature of the sample. Reporting limits are factored for the sample size reduction.

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05424
Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

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

Report Date : 12/01/2014
Received : 11/18/2014

Report Number : **14-322-0270**

REPORT OF ANALYSIS

Lab No : **97177**
Sample ID : **Grab**

Matrix: **Aqueous**
Sampled: **11/18/2014 11:30**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	**6.00**	µg/L	5.00	1	11/25/14 11:00	EWB	4500CNE-2011

Qualifiers/ Definitions

*	Outside QC limit	DF	Dilution Factor
MQL	Method Quantitation Limit		

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

Report Date : 12/01/2014
Received : 11/18/2014

Report Number : **14-322-0270**

REPORT OF ANALYSIS

Lab No : **97177**
Sample ID : **Grab**

Matrix: **Aqueous**
Sampled: **11/18/2014 11:30**

Analytical Method: 624
Prep Method: EPA-624 (PREP) **Prep Batch(es):** L220589 **Date/Time Prepped:** 11/25/2014 08:00:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Benzene	**3.94**	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
Carbon Tetrachloride	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
Chlorobenzene	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
Chloroethane	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
Chloroform	**1.26**	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
Methyl Chloride	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
1,1-Dichloroethane	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
1,2-Dichloroethane	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
1,1-Dichloroethylene	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
1,2-trans-Dichloroethylene	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
1,2-Dichloropropane	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
cis-1,3-Dichloropropene	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
trans-1,3-Dichloropropene	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
1,3-Dichloropropylene	<1.00	µg/L	1.00	1	11/25/14 18:28		L220591
Ethylbenzene	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
Methylene Chloride	<10.0	µg/L	10.0	1	11/25/14 18:28	ACS	L220591
Tetrachloroethylene	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
Toluene	<5.00	µg/L	5.00	1	11/25/14 18:28	ACS	L220591
1,1,1-Trichloroethane	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
1,1,2-Trichloroethane	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
Trichloroethylene	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591

Qualifiers/ Definitions
* Outside QC limit
I Recovery out of range
DF Dilution Factor
MQL Method Quantitation Limit

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

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

Report Date : 12/01/2014
Received : 11/18/2014

Report Number : **14-322-0270**

REPORT OF ANALYSIS

Lab No : **97177**
Sample ID : **Grab**

Matrix: **Aqueous**
Sampled: **11/18/2014 11:30**

Analytical Method: 624
Prep Method: EPA-624 (PREP) **Prep Batch(es):** L220589 **Date/Time Prepped:** 11/25/2014 08:00:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Vinyl Chloride	<1.00	µg/L	1.00	1	11/25/14 18:28	ACS	L220591
Surrogate: 4-Bromofluorobenzene	86.6		Limits: 71-131%	1	11/25/14 18:28	ACS	L220591
Surrogate: Dibromofluoromethane	89.6		Limits: 70-128%	1	11/25/14 18:28	ACS	L220591
Surrogate: 1,2-Dichloroethane - d4	104		Limits: 67-136%	1	11/25/14 18:28	ACS	L220591
Surrogate: Toluene-d8	97.0		Limits: 70-130%	1	11/25/14 18:28	ACS	L220591

Qualifiers/ Definitions

*	Outside QC limit	DF	Dilution Factor
I	Recovery out of range	MQL	Method Quantitation Limit

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

Report Date : 12/01/2014
Received : 11/18/2014

Report Number : **14-322-0270**

REPORT OF ANALYSIS

Lab No : **97178**
Sample ID : **Composite 11/17-18/14**

Matrix: **Aqueous**
Sampled: **11/18/2014 0:00**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Lead	**0.528**	µg/L	0.500	1	11/19/14 18:58	RQE	EPA-200.8
Total Zinc	**70.6**	µg/L	5.00	1	11/19/14 18:58	RQE	EPA-200.8

Qualifiers/ Definitions

*	Outside QC limit	DF	Dilution Factor
MQL	Method Quantitation Limit		

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

Report Date : 12/01/2014
Received : 11/18/2014

Report Number : **14-322-0270**

REPORT OF ANALYSIS

Lab No : **97178**
Sample ID : **Composite 11/17-18/14**

Matrix: **Aqueous**
Sampled: **11/18/2014 0:00**

Analytical Method: 625
Prep Method: 625 **Prep Batch(es):** L220455 **Date/Time Prepped:** 11/24/2014 15:00:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Acenaphthene	<8.00	µg/L	8.00	1	11/25/14 15:22	SEB	L220523
Anthracene	<8.00	µg/L	8.00	1	11/25/14 15:22	SEB	L220523
Bis(2-ethylhexyl)phthalate	<40.0	µg/L	40.0	1	11/25/14 15:22	SEB	L220523
1,2-Dichlorobenzene	<20.0	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
1,3-Dichlorobenzene	<20.0	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
1,4-Dichlorobenzene	<20.0	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
Diethyl phthalate	<20.0	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
Dimethyl phthalate	<1.91	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
Di-n-butyl phthalate	<20.0	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
4,6-Dinitro-o-cresol	<40.0	µg/L	40.0	1	11/25/14 15:22	SEB	L220523
Fluoranthene	<8.00	µg/L	8.00	1	11/25/14 15:22	SEB	L220523
Fluorene	<8.00	µg/L	8.00	1	11/25/14 15:22	SEB	L220523
Hexachlorobenzene	<20.0	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
Hexachlorobutadiene	<20.0	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
Hexachloroethane	<20.0	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
Naphthalene	<8.00	µg/L	8.00	1	11/25/14 15:22	SEB	L220523
Nitrobenzene	<20.0	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
2-Nitrophenol	<20.0	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
4-Nitrophenol	<80.0	µg/L	80.0	1	11/25/14 15:22	SEB	L220523
Phenanthrene	<8.00	µg/L	8.00	1	11/25/14 15:22	SEB	L220523
Pyrene	<8.00	µg/L	8.00	1	11/25/14 15:22	SEB	L220523

Qualifiers/ Definitions
* Outside QC limit
I Recovery out of range
DF Dilution Factor
MQL Method Quantitation Limit

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05424
Rineco Analytical Services
Ms. Mia Dixon
P O Box 729
Benton , AR 72018

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

Report Date : 12/01/2014
Received : 11/18/2014

Report Number : **14-322-0270**

REPORT OF ANALYSIS

Lab No : **97178**
Sample ID : **Composite 11/17-18/14**

Matrix: **Aqueous**
Sampled: **11/18/2014 0:00**

Analytical Method: 625
Prep Method: 625 **Prep Batch(es):** L220455 **Date/Time Prepped:** 11/24/2014 15:00:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
1,2,4-Trichlorobenzene	<20.0	µg/L	20.0	1	11/25/14 15:22	SEB	L220523
Surrogate: 2-Fluorobiphenyl	**9.53** *		Limits: 38-107%	1	11/25/14 15:22	SEB	L220523
Surrogate: 2-Fluorophenol	12.9		Limits: 8-88%	1	11/25/14 15:22	SEB	L220523
Surrogate: Nitrobenzene-d5	**18.2** *		Limits: 29-105%	1	11/25/14 15:22	SEB	L220523
Surrogate: Phenol-d6	10.1		Limits: 7-58%	1	11/25/14 15:22	SEB	L220523
Surrogate: 4-Terphenyl-d14	34.3		Limits: 30-130%	1	11/25/14 15:22	SEB	L220523
Surrogate: 2,4,6-Tribromophenol	27.6		Limits: 16-138%	1	11/25/14 15:22	SEB	L220523

Qualifiers/ Definitions
* Outside QC limit
I Recovery out of range
DF Dilution Factor
MQL Method Quantitation Limit

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Cooler Receipt Form

Customer Number: **05424**
Customer Name: **Rineco Analytical Services**
Report Number: **14-322-0270**

Shipping Method

○ Fed Ex	○ US Postal	● Lab	○ Other :	
○ UPS	○ Client	○ Courier	Thermometer ID:	#4

Shipping container/cooler uncompromised?	● Yes	○ No	
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: Brooke Shoup Date & Time: 11/18/2014 13:36:16

ETC
ENVIRONMENTAL TESTING & CONSULTING, INC.
2790 Whitten Road Memphis, Tennessee 38133 (901) 213-2400 Fax (901) 213-2440

14-322-0270
05424
11-18-2014
13:36:04
Rineco Analytical Services
United Initiators. SPI. Inc.

Company Name	Customer Number	Telephone	RUSH	ICE
Rineco Analytical Services	05424	(501) 778-9089		

Site Name	Project Comment	FID Number
United Initiators. SPI, Inc.		

Project	Project Number	PO Number
Rineco - Semi-annual		

Project Manager / Contact	E-mail
Rineco Analytical Services	

Sample ID	Container Type	Collected Date / Time	# Cont	Preservative	Grab / Comp	Matrix	Analyses
Grab	Glass Vial Amber - 40ml	1130 11/18/14	3	HCL - Hydrochloric Acid	G	Aqueous	VOC
Grab	Plastic - Pint	〃 〃	1	NaOH - Sodium Hydroxide	G	Aqueous	CNT
Composite	Plastic - Pint	1117 11/18/14 —	1	HNO3 - Nitric Acid	C	Aqueous	Pb/Zn
Composite	Glass Amber - Liter	〃 〃	2	Na2S2O3 - Sodium Thiosulfate	C	Aqueous	SVOC

Sampled By	Method of Shipment	Blank / Cooler Temperature 4°C 1.1°C	Remarks

Relinquished By (sign)	Date / Time	Received By (sign)	Date / Time
Relinquished By (sign)	Date / Time	Received By (sign)	Date / Time
Relinquished By (sign)	Date / Time 1320 11/18/14	Received by Lab (sign)	Date / Time 1320 11/18/14

1/1

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12/24/2014

Rineco Analytical Services
Mr. Jeff Wages
P O Box 729
Benton, AR, 72018

Ref: Analytical Testing
ETC Report Number: 14-352-0200
Client Project Description: United-Wastewater
Rineco - Syrgis

Dear Mr. Jeff Wages:

Environmental Testing and Consulting, Inc. received sample(s) on 12/18/2014 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,

Randall H. Thomas

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

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05424
Rineco Analytical Services
Mr. Jeff Wages
P O Box 729
Benton , AR 72018

Project Information : United-Wastewater
Rineco - Syrgis

Report Date : 12/24/2014

Report Number : **14-352-0200**

REPORT OF ANALYSIS

Received : 12/18/2014

Lab No : **92968**
Sample ID : **Process Waste Water**

Matrix: **Aqueous**
Sampled: **12/16/2014 15:30**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Lead	<2.50	µg/L	2.50	5	12/23/14 22:07	RQE	EPA-200.8
Total Zinc	<25.0	µg/L	25.0	5	12/23/14 22:07	RQE	EPA-200.8

Qualifiers/ Definitions

*	Outside QC limit	DF	Dilution Factor
MQL	Method Quantitation Limit		

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Cooler Receipt Form

Customer Number: **05424**
Customer Name: **Rineco Analytical Services**
Report Number: **14-352-0200**

Shipping Method

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

Shipping container/cooler uncompromised?	● Yes	○ No	
Number of coolers received	1		
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: Brooke Shoup Date & Time: 12/18/2014 08:09:50

ETC
ENVIRONMENTAL TESTING & CONSULTING, INC.
2790 Whitten Road Memphis, Tennessee 38133 (901) 213-2400 Fax (901) 213-2440

CHAIN OF [illegible]

14-352-0200
05424
12-18-2014
08:07:52
Rineco Analytical Services
United-Wastewater

Company Name	Customer Number	Telephone	RUSH	ICE
Rineco Analytical Services	05424	(870) 572-2935		

Site Name	Project Comment	FID Number
United - Wastewater	Waste Water from Processes	

Project	Project Number	PO Number
Rineco - Syngis		

Project Manager / Contact	E-mail
Mr. Jeff Wages	jeff.wages@united-in.com

Sample ID	Container Type	Collected Date / Time	# Cont	Preservative	Grab / Comp	Matrix	Analyses
Process Waste Water	Plastic - Pint	12-16-14 3:30 PM	1	HNO3 - Nitric Acid		Aqueous	200.8 - Zn, Pb

Sampled By	Method of Shipment	Blank / Cooler Temperature	Remarks
J. Wages	FedEx Express	N/A	

Relinquished By (sign)	Date / Time	Received By (sign)	Date / Time
J. Wages	12-17-2014 11:00 AM		
Relinquished By (sign)	Date / Time	Received By (sign)	Date / Time
Relinquished By (sign)	Date / Time	Received by Lab (sign)	Date / Time
		BHall	12-18-14

1/1

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 414

Return to: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION

A. LEGAL NAME & MAILING ADDRESS	B. FACILITY & LOCATION ADDRESS
United Initiators, Inc. **334 Phillips 311 Road** **Helena, AR 72342-9033**	**United Initiators, Inc.** **334 Phillips 311 Road** **Helena, AR 72342-9033**

C. FACILITY CONTACT: **Jeff Wages** TELEPHONE NUMBER: **870.572.2935 x307**

e-mail address **jeff.wages@united-in.com**

(2) REPORTING PERIOD

A. MONTHS WHICH REPORTS ARE DUE	B. PERIOD COVERED BY THIS REPORT
February & **August**	FROM: **August 2014** TO: **February 2015**

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

Specify Category and Sub-Categor(ies)

Check each applicable Subpart

9 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.

C. Number of Regular Employees at this Facility **43**

(4) FLOW MEASUREMENT

A. Total Plant Flow to POTW in Gallons per Day

Average: **55,586** gpd Maximum: **60,569** gpd

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	54,856	59,773	Batch & continuous
Unregulated*			
Cooling Water			
**Sanitary	730	796	

*"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)			
Effluent characteristics	**Max for any 1 day	**Max for any monthly avg	Measured Max for any 1 day (ug/l)	Measured Max for any monthly avg (ug/l)
Acenaphthene	44	18	<8.00	<8.00
Anthracene	44	18	<8.00	<8.00
Benzene	124	53	3.94	3.94
Bis(2-ethylhexyl) phthalate	239	88	<40.0	<40.0
Carbon Tetrachloride	353	132	<1.00	<1.00
Chlorobenzene	353	132	<1.00	<1.00
Chloroethane	274	102	<1.00	<1.00
Chloroform	301	103	1.26	1.26
Di-n-butyl phthalate	40	19	<20.0	<20.0
1,2-Dichlorobenzene	737	182	<20.0	<20.0
1,3-Dichlorobenzene	353	132	<20.0	<20.0
1,4-Dichlorobenzene	353	132	<20.0	<20.0
1,1-Dichloroethane	55	20	<1.00	1.00
1,2-Dichloroethane	532	167	<1.00	<1.00

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

1,1-Dichloroethylene	56	20	<1.00	<1.00
1,2-trans-Dichloroethylene	61	23	<1.00	<1.00
1,2-Dichloropropane	737	182	<1.00	<1.00
1,3-Dichloropropylene	737	182	<1.00	<1.00
Diethyl phthalate	105	43	<20.0	<20.0
Dimethyl phthalate	44	18	<1.91	<1.91
4,6-Dinitro-o-cresol	257	72	<40.0	<40.0
Ethylbenzene	353	132	<1.00	<1.00
Fluoranthene	50	20	<8.00	<8.00
Fluorene	44	18	<8.00	<8.00
Hexachlorobenzene	737	182	<20.0	<20.0
Hexachlorobutadiene	353	132	<20.0	<20.0
Hexachloroethane	737	182	<20.0	<20.0
Methyl Chloride	274	102	<1.00	<1.00
Methylene Chloride	158	33	<10.0	<10.0
Naphthalene	44	18	<8.00	<8.00
Nitrobenzene	5,939	2,075	<20.0	<20.0
2-Nitrophenol	214	60	<20.0	<20.0
4-Nitrophenol	534	150	<80.0	<80.0
Phenanthrene	44	18	<8.00	<8.00
Pyrene	45	19	<8.00	<8.00
Tetrachloroethylene	152	48	<1.00	<1.00
Toluene	69	26	<5.00	<5.00
Total Cyanide	1,113	390	6.00	6.00
Total Lead	57.6	57.6	<2.50	<2.50
Total Zinc[2]	134.4	134.4	<25.0	<25.0
1,2,4-Trichlorobenzene	737	182	<20.0	<20.0
1,1,1-Trichloroethane	55	20	<1.00	<1.00
1,1,2-Trichloroethane	118	30	<1.00	<1.00
Trichloroethylene	64	24	<1.00	<1.00
Vinyl Chloride	160	90	<1.00	<1.00

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, Inc. processes to be analyzed for lead and zinc. ETC Report Number: 14-352-0200 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

2-10-2015
DATE SIGNED

UNITED INITIATORS
driving your success

United Initiators, 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

2/2/2015

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

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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' 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 2015 Report			
Composite sample by percent of process wastewater for zinc and lead analysis				
Process	**BPO**	**MEKP**	**MIBKP**	**Total**
Average GPD	34,339	20,352	165	54856
% 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.

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

ADEQ

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.

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

ADEQ

A R K A N S A S
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

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:

Lead => 48 + 48 x 0.2 = 48 + 9.6 = 57.6 µg/l
Zinc => 112 + 112 x 0.2 = 112 + 22.4 = 134.4 µg/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 J. Torrence, Water Division Engineer

Encl: ADEQ Letter dated 9-4-2009