

**From:** [Jamie Belcourt \(adpce.ad\)](mailto:jamie.belcourt@adpce.ad)  
**To:** "Maggie Strom"; [jeff.wages@united-in.com](mailto:jeff.wages@united-in.com)  
**Cc:** [Stacie Wassell \(adpce.ad\)](mailto:stacie.wassell@adpce.ad)  
**Subject:** United Initiators' (Pretreatment ID: ARP001013) Semiannual Pretreatment Report  
**Date:** Thursday, April 13, 2023 2:48:14 PM  
**Attachments:** [image006.png](#)  
[image007.png](#)  
[image008.png](#)  
[image002.png](#)

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Hello,

United Initiators' (Pretreatment ID: ARP001013) Semiannual Pretreatment Report for the August 1, 2022 through January 31, 2023 reporting period was electronically received, reviewed, and deemed complete and compliant with the reporting requirements in 40 CFR § 403.12(e) and more specifically in compliance with the Specialty Organic Chemicals Pretreatment standards in 40 CFR § 414 Subpart H.

No further action is deemed necessary at this time.

Thank you,

**Jamie Belcourt** | State Pretreatment Coordinator  
**Division of Environmental Quality | Office of Water Quality**  
**Policy and Administration**

5301 Northshore Drive | North Little Rock, AR 72118  
t: 501.682.0858 | c: 501.287.8714 | e: [jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)



**ARKANSAS**  
ENERGY & ENVIRONMENT

---

**From:** Maggie Strom [<mailto:mstrom@tiogaenv.com>]  
**Sent:** Friday, April 7, 2023 8:30 AM  
**To:** Jamie Belcourt (adpce.ad); [jeff.wages@united-in.com](mailto:jeff.wages@united-in.com)  
**Cc:** Stacie Wassell (adpce.ad)  
**Subject:** RE: United Initiators' (Pretreatment ID: ARP001013) Semiannual Pretreatment Report

Jamie,

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Thanks,  
Maggie

**Maggie Strom, QEP, CHMM**

*Vice President*

**Tioga Environmental Consultants, Inc.**

357 North Main Street

Memphis, TN 38103

**Phone:** 901.791.2432 **Fax:** 901.791.2442

**Cell:** 901.491.0011 **Email:** [mstrom@tiogaenv.com](mailto:mstrom@tiogaenv.com)

**Web:** [www.tiogaenv.com](http://www.tiogaenv.com)

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**From:** Jamie Belcourt (adpce.ad) <[jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)>

**Sent:** Tuesday, March 21, 2023 4:09 PM

**To:** Maggie Strom <[mstrom@tiogaenv.com](mailto:mstrom@tiogaenv.com)>; 'jeff.wages@united-in.com' <[jeff.wages@united-in.com](mailto:jeff.wages@united-in.com)>

**Cc:** Stacie Wassell (adpce.ad) <[Stacie.Wassell@adeq.state.ar.us](mailto:Stacie.Wassell@adeq.state.ar.us)>

**Subject:** RE: United Initiators' (Pretreatment ID: ARP001013) Semiannual Pretreatment Report

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----- Original Message -----

From: Maggie Strom <[mstrom@tiogaenv.com](mailto:mstrom@tiogaenv.com)>

Date: Tue, March 21, 2023 3:47 PM -0500

To: "Jamie Belcourt (adpce.ad)" <[jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)>, "'jeff.wages@united-in.com'" <[jeff.wages@united-in.com](mailto:jeff.wages@united-in.com)>

CC: "Stacie Wassell (adpce.ad)" <[Stacie.Wassell@adeq.state.ar.us](mailto:Stacie.Wassell@adeq.state.ar.us)>

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**Sent:** Tuesday, March 21, 2023 2:33 PM

**To:** Maggie Strom <[mstrom@tiogaenv.com](mailto:mstrom@tiogaenv.com)>; 'jeff.wages@united-in.com' <[jeff.wages@united-in.com](mailto:jeff.wages@united-in.com)>

**Cc:** Stacie Wassell (adpce.ad) <[Stacie.Wassell@adeq.state.ar.us](mailto:Stacie.Wassell@adeq.state.ar.us)>

**Subject:** RE: United Initiators' (Pretreatment ID: ARP001013) Semiannual Pretreatment Report

Maggie,

Please resample using a method with a sufficient MQL to demonstrate compliance with the limits.

Thank you,

**Jamie Belcourt** | State Pretreatment Coordinator

**Division of Environmental Quality | Office of Water Quality  
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ENERGY & ENVIRONMENT

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**From:** Maggie Strom [<mailto:mstrom@tiogaenv.com>]

**Sent:** Monday, March 13, 2023 7:51 AM

**To:** Jamie Belcourt (adpce.ad); 'jeff.wages@united-in.com'

**Cc:** Stacie Wassell (adpce.ad)

**Subject:** RE: United Initiators' (Pretreatment ID: ARP001013) Semiannual Pretreatment Report

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**Sent:** Friday, March 10, 2023 1:18 PM  
**To:** Maggie Strom <[mstrom@tiogaenv.com](mailto:mstrom@tiogaenv.com)>; 'jeff.wages@united-in.com' <[jeff.wages@united-in.com](mailto:jeff.wages@united-in.com)>  
**Cc:** Stacie Wassell (adpce.ad) <[Stacie.Wassell@adeq.state.ar.us](mailto:Stacie.Wassell@adeq.state.ar.us)>  
**Subject:** RE: United Initiators' (Pretreatment ID: ARP001013) Semiannual Pretreatment Report

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Please provide calculations for the mass that was determined as defined in 40 CFR § 414.111(a) – (b).

In addition, please provide a description the PSES and PSNS limits columns. Do you have documentation showing particular limits for your facility that have been given in the past?

Thank you,

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**From:** Jamie Belcourt (adpce.ad) <[jamie.belcourt@adeq.state.ar.us](mailto:jamie.belcourt@adeq.state.ar.us)>

**Sent:** Tuesday, February 28, 2023 9:28 AM

**To:** 'jeff.wages@united-in.com' <[jeff.wages@united-in.com](mailto:jeff.wages@united-in.com)>; Maggie Strom  
<[mstrom@tiogaenv.com](mailto:mstrom@tiogaenv.com)>

**Cc:** Stacie Wassell (adpce.ad) <[Stacie.Wassell@adeq.state.ar.us](mailto:Stacie.Wassell@adeq.state.ar.us)>

**Subject:** United Initiators' (Pretreatment ID: ARP001013) Semiannual Pretreatment Report

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**Division of Environmental Quality | Office of Water Quality**

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**Subject:** RE: United Initiators' (Pretreatment ID: ARP001013) Semiannual Pretreatment Report  
**Date:** Friday, April 7, 2023 8:28:58 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[United Initiators CFR 414 semi annual report 23\\_2 Revised.pdf](#)

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# ARKANSAS

## ENERGY & ENVIRONMENT

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**ARKANSAS**  
**ENERGY & ENVIRONMENT**



April 7, 2023

Arkansas Department of Environmental Quality  
Pretreatment Program  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

RE: Wastewater Pretreatment Program  
40 CFR 414 Semi Annual Report  
United Initiators, Inc  
Helena, Arkansas


Dear Sirs,

On behalf of United Initiators, Inc., located at 334 Phillips 311 Road in Helena, Arkansas please find the wastewater pretreatment program Semi Annual Report for the period August 1, 2022 through January 31, 2023. This report was prepared in accordance with the requirements of 40 CFR 414. In addition to this report the wastewater analysis performed during this period is also attached.

This is a revised report. Waypoint Analytical provided a laboratory report with lower detection limits as requested. This laboratory report was used to complete the revised SAR for the period August 1, 2022 – January 31, 2023 that is attached.

Thank you for the opportunity to provide you with this report. If you have any questions, please feel free to contact me at (901)791-2432.

Sincerely,  
**TIOGA ENVIRONMENTAL CONSULTANTS, INC.**



Margaret F. Strom, QEP, CHMM  
Vice President

Attachments: Semi-Annual Wastewater Pretreatment Report - Revised  
Wastewater Analysis Laboratory Reports - Revised

**Down-to-earth partners. Sky's-the-limit solutions.**



**40CFR414 SEMI-ANNUAL REPORT CON'D FACILITY NAME: United Initiators, Inc.**

<b>(4) FLOW MEASUREMENT (CON'D)</b>				
B. INDIVIDUAL PROCESS FLOWS IN GALLONS PER DAY				
Process	Average Flow Rate (gpd)	Maximum Flow Rate (gpd)	Type of Discharge (Batch, etc)	
Regulated	16,280	18,423	Batch & Continuous	
Unregulated*				
Cooling Water				
Sanitary	1,118	1,265	Continuous	
*"Unregulated" has a precise legal meaning; see 40CFR403.6(e).				

<b>(5) MEASUREMENT OF POLLUTANTS</b>	
A. TYPE OF TREATMENT SYSTEM  CHECK EACH APPLICABLE BLOCK  <input type="checkbox"/> Neutralization <input type="checkbox"/> Chemical Precipitation and Sedimentation <input checked="" type="checkbox"/> Biological <input type="checkbox"/> Cyanide Destruction <input type="checkbox"/> Other _____ <input type="checkbox"/> None	B. COMMENTS ON TREATMENT SYSTEM  Two aerated ponds with a total surface area of ~6.5 acres.  ** Sanitary plus dilution from rain water equals ~0.94.
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 for any 1 day (ug/l)	Measured Max for any monthly avg (ug/l)
	Max for any 1 day	Max for any monthly avg		
Acenaphthene	41	17	<10.8	<10.8
Anthracene	41	17	<11.2	<11.2
Benzene	118	50	<10	<10
Bis(2-ethylhexyl) phthalate	227	84	<24	<24
Carbon Tetrachloride	334	125	<10	<10
Chlorobenzene	334	125	<10	<10
Chloroethane	259	97	<10	<10
Chloroform	286	98	<10	<10
Di-n-butyl phthalate	38	18	<17.6	<17.6
1,2-Dichlorobenzene	698	172	<10	<10
1,3-Dichlorobenzene	334	125	<10	<10
1,4-Dichlorobenzene	334	125	<10	<10
1,1-Dichloroethane	52	19	<10	<10
1,2-Dichloroethane	505	158	<10	<10

**40CFR414 SEMI-ANNUAL REPORT CON'D FACILITY NAME: United Initiators, Inc.**

1,1-Dichloroethylene	53	19	<10	<10
1,2-trans-Dichloroethylene	58	22	<10	<10
1,2-Dichloropropane	698	172	<10	<10
1,3-Dichloropropylene	698	172	<10	<10
Diethyl phthalate	99	40	<11.2	<11.2
Dimethyl phthalate	41	17	<9.2	<9.2
4,6-Dinitro-o-cresol	244	69	7.26	7.26
Ethylbenzene	334	125	<10	<10
Fluoranthene	47	19	<20	<20
Fluorene	41	17	<9.6	<9.6
Hexachlorobenzene	698	172	<12.8	<12.8
Hexachlorobutadiene	334	125	<10.0	<10.0
Hexachloroethane	698	172	<14.4	<14.4
Methyl Chloride	259	97	<10	<10
Methylene Chloride	150	32	<100	<100
Naphthalene	41	17	<28.8	<28.8
Nitrobenzene	5631	1968	<24.4	<24.4
2-Nitrophenol	203	57	<0.340	<0.340
4-Nitrophenol	507	142	<3.58	<3.58
Phenanthrene	41	17	<8.4	<8.4
Pyrene	42	18	<26.0	<26.0
Tetrachloroethylene	144	46	<10	<10
Toluene	65	25	<50	<50
Total Cyanide	1055.5	369	<5	<5
Total Lead	57.6	57.6	<50	<50
Total Zinc <sup>2</sup>	134	134	<2000	<2000
1,2,4-Trichlorobenzene	698	172	<10.0	<10.0
1,1,1-Trichloroethane	52	19	<10	<10
1,1,2-Trichloroethane	112	28	<10	<10
Trichloroethylene	61	23	<10	<10
Vinyl Chloride	151	85	<10	<10

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

(7) GENERAL COMMENTS

\*Analysis results for Total Zinc and Total Lead are from process water samples taken of process water prior to entering United Initiators' waste water treatment system (Report Number 22-196-0167). A sample was not collected during this period however this July sampling event is expected to be representative of the August 2022-January 2023 sampling period

(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

3/31/23  
DATE SIGNED

3/27/2023

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

Ref: Analytical Testing  
Revised Lab Report Number: 22-319-9122 (Original Report 22-319-0122)  
Client Project Description: United Initiators, SPI, Inc.  
Semi-annual Sampling

Dear Mr. Jeff Wages:

Waypoint Analytical, LLC. received sample(s) on 11/15/2022 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. Where the laboratory was not responsible for the sampling stage (refer to the chain of custody) results apply to the sample as received.

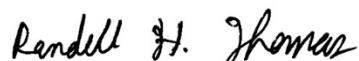
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2021) 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.

Certain parameters (chlorine, pH, dissolved oxygen, sulfite...) are required to be analyzed within 15 minutes of sampling. Usually, but not always, any field parameter analyzed at the laboratory is outside of this holding time. Refer to sample analysis time for confirmation of holding time compliance.

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.*





## Certification Summary

**Laboratory ID: WP MTN: Waypoint Analytical, LLC., Memphis, TN**

State	Program	Lab ID	Expiration Date
Alabama	State Program	40750	02/29/2024
Arkansas	State Program	88-0650	02/07/2024
California	State Program	2904	06/30/2023
Florida	State Program - NELAP	E871157	06/30/2023
Georgia	State Program	C044	11/14/2025
Georgia	State Program	04015	06/30/2023
Illinois	State Program - NELAP	200078	10/10/2023
Kentucky	State Program	80215	06/30/2023
Kentucky	State Program	KY90047	12/31/2023
Louisiana	State Program - NELAP	LA037	12/31/2023
Louisiana	State Program - NELAP	04015	06/30/2023
Mississippi	State Program	MS	02/11/2023
North Carolina	State Program	47701	07/31/2023
North Carolina	State Program	415	12/31/2023
Pennsylvania	State Program - NELAP	68-03195	05/31/2023
South Carolina	State Program	84002	06/30/2023
Tennessee	State Program	02027	11/14/2025
Texas	State Program - NELAP	T104704180	09/30/2023
Virginia	State Program	00106	06/30/2023
Virginia	State Program - NELAP	460181	09/14/2023

**Sample Summary Table**

**Report Number:** 22-319-9122  
**Client Project Description:** United Initiators, SPI, Inc.  
Semi-annual Sampling

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<b>Lab No</b>	<b>Client Sample ID</b>	<b>Matrix</b>	<b>Date Collected</b>	<b>Date Received</b>
90911	Grab	Aqueous	11/15/2022 11:00	11/15/2022
90912	Composite	Aqueous	11/15/2022 09:20	11/15/2022
90913	Composite	Aqueous	11/15/2022 09:20	11/15/2022

---



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Client: United Initiators, Inc  
Project: United Initiators, SPI, Inc.  
Lab Report Number: 22-319-9122  
Date: 3/27/2023

---

**CASE NARRATIVE**

This report is being revised in order to report the EPA Method 625 compounds at the Method Detection Limit instead of the Method Quantitation Limit due to matrix interference.

**Metals Analyses Method EPA-200.8**

Sample 90912 (Composite)

QC Batch No: L649324/L649018

Based on sample screening, a dilution was performed due to high levels of target and/or non-target analytes. Reporting limits have been adjusted accordingly.

**Volatile Organic Compounds - GC/MS Method 624.1**

Sample 90911 (Grab)

QC Batch No: L649893/L649828

The sample was diluted due to the nature of the sample matrix. Reporting limits have been adjusted accordingly.

**Semivolatile Organic Compounds - GC/MS Method 625.1**

Sample 90912 (Composite)

QC Batch No: L649832/L649704

Surrogate(s) 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 biased recoveries were due to the sample matrix.

Analyte: Pyrene

QC Batch No: L649832/L649704

This target analyte was flagged for recoveries outside QC limits in the associated LCS/LCSD. Data for this analyte is flagged "M" to indicate that results should be considered minimum concentration due to the potential for a low bias.

Sample 90913 (Composite)

QC Batch No: L650114/L649957

Surrogate recovery(s) was flagged as outside QC limits due to high levels of target and/or non-target analytes. Batch QC samples (method blank and laboratory control samples) all showed surrogates within QC limits.

**Extraction and Conc. for 625 Method 625.1**

Sample 90912 (Composite)

QC Batch No: L649704/L649704

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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 Main 901.213.2400 ° Fax 901.213.2440  
 www.waypointanalytical.com

11985

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

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

Original Report Date : 11/28/2022  
 Revised Report Date: 03/27/2023  
 Received : 11/15/2022

Report Number : **22-319-9122**

**REPORT OF ANALYSIS**

Lab No : **90911**  
 Sample ID : **Grab**

Matrix: **Aqueous**  
 Sampled: **11/15/2022 11:00**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<5.00	µg/L	5.00	1	11/23/22 13:00	CJR	4500CNE-2016

**Qualifiers/  
 Definitions**

*	Outside QC Limit	DF	Dilution Factor
J	Estimated value	M	Minimum value
MQL	Method Quantitation Limit		



11985

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

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

Original Report Date : 11/28/2022  
Revised Report Date: 03/27/2023  
Received : 11/15/2022

Report Number : **22-319-9122**

**REPORT OF ANALYSIS**

Lab No : **90911**

Matrix: **Aqueous**

Sample ID : **Grab**

Sampled: **11/15/2022 11:00**

**Analytical Method:** 624.1 **Prep Batch(es):** **L649828** 11/20/22 10:53

**Prep Method:** 624.1

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Batch
1,1,2-Trichloroethane	<10.0	µg/L	10.0	10	11/20/22 21:03	HRS	L649893
Trichloroethylene	<10.0	µg/L	10.0	10	11/20/22 21:03	HRS	L649893
Vinyl Chloride	<10.0	µg/L	10.0	10	11/20/22 21:03	HRS	L649893
Surrogate: 4-Bromofluorobenzene	93.4		Limits: 71-131%	10	11/20/22 21:03	HRS	L649893
Surrogate: Dibromofluoromethane	106		Limits: 70-128%	10	11/20/22 21:03	HRS	L649893
Surrogate: 1,2-Dichloroethane - d4	100		Limits: 67-136%	10	11/20/22 21:03	HRS	L649893
Surrogate: Toluene-d8	94.4		Limits: 70-130%	10	11/20/22 21:03	HRS	L649893

**Qualifiers/  
Definitions**

*	Outside QC Limit	DF	Dilution Factor
J	Estimated value	M	Minimum value
ML	Method Quantitation Limit		

11985

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

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

Original Report Date : 11/28/2022  
Revised Report Date: 03/27/2023  
Received : 11/15/2022

Report Number : **22-319-9122**

**REPORT OF ANALYSIS**

Lab No : **90912**

Matrix: **Aqueous**

Sample ID : **Composite**

Sampled: **11/15/2022 9:20**

Test	Results	Units	MDL	MQL	DF	Date / Time Analyzed	By	Analytical Method
Lead	<5.00	µg/L		5.00	10	11/17/22 03:05	CPW	EPA-200.8
Zinc	<b>101</b>	µg/L		100	10	11/17/22 03:05	CPW	EPA-200.8

**Qualifiers/  
Definitions**

*	Outside QC Limit	DF	Dilution Factor
J	Estimated value	M	Minimum value
MQL	Method Quantitation Limit		

11985

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

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

Original Report Date : 11/28/2022  
 Revised Report Date: 03/27/2023  
 Received : 11/15/2022

Report Number : **22-319-9122**

**REPORT OF ANALYSIS**

Lab No : **90912**

Matrix: **Aqueous**

Sample ID : **Composite**

Sampled: **11/15/2022 9:20**

**Analytical Method:** 625.1                      **Prep Batch(es):** **L649704** 11/18/22 14:09  
**Prep Method:** 625.1

Test	Results	Units	MDL	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Acenaphthene	<10.8	µg/L	10.8	80.0	10	11/18/22 23:16	VBW	L649832
Anthracene	<11.2	µg/L	11.2	80.0	10	11/18/22 23:16	VBW	L649832
Bis(2-ethylhexyl)phthalate	<24.0	µg/L	24.0	400	10	11/18/22 23:16	VBW	L649832
Diethyl phthalate	<11.2	µg/L	11.2	200	10	11/18/22 23:16	VBW	L649832
Dimethyl phthalate	<9.20	µg/L	9.20	200	10	11/18/22 23:16	VBW	L649832
Di-n-butyl phthalate	<17.6	µg/L	17.6	200	10	11/18/22 23:16	VBW	L649832
Fluoranthene	<20.0	µg/L	20.0	80.0	10	11/18/22 23:16	VBW	L649832
Fluorene	<9.60	µg/L	9.60	80.0	10	11/18/22 23:16	VBW	L649832
Hexachlorobenzene	<12.8	µg/L	12.8	200	10	11/18/22 23:16	VBW	L649832
Hexachlorobutadiene	<10.0	µg/L	10.0	200	10	11/18/22 23:16	VBW	L649832
Hexachloroethane	<14.4	µg/L	14.4	200	10	11/18/22 23:16	VBW	L649832
Naphthalene	<28.8	µg/L	28.8	80.0	10	11/18/22 23:16	VBW	L649832
Nitrobenzene	<24.4	µg/L	24.4	200	10	11/18/22 23:16	VBW	L649832
Phenanthrene	<8.40	µg/L	8.40	80.0	10	11/18/22 23:16	VBW	L649832
Pyrene	<26.0 M	µg/L	26.0	80.0	10	11/18/22 23:16	VBW	L649832
1,2,4-Trichlorobenzene	<10.0	µg/L	10.0	200	10	11/18/22 23:16	VBW	L649832
Surrogate: 2-Fluorobiphenyl	<b>20.6 *</b>		Limits: 30-107%		10	11/18/22 23:16	VBW	L649832
Surrogate: Nitrobenzene-d5	<b>19.2 *</b>		Limits: 29-105%		10	11/18/22 23:16	VBW	L649832
Surrogate: 4-Terphenyl-d14	<b>14.8 *</b>		Limits: 30-130%		10	11/18/22 23:16	VBW	L649832

Qualifiers/Definitions	*	Outside QC Limit	DF	Dilution Factor
	J	Estimated value	M	Minimum value
	MQL	Method Quantitation Limit		



11985

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

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

Original Report Date : 11/28/2022  
Revised Report Date: 03/27/2023  
Received : 11/15/2022

Report Number : **22-319-9122**

**REPORT OF ANALYSIS**

Lab No : **90913**

Matrix: **Aqueous**

Sample ID : **Composite**

Sampled: **11/15/2022 9:20**

**Analytical Method:** 625.1

**Prep Batch(es):** **L649957** 11/21/22 13:15

**Prep Method:** 625.1

Test	Results	Units	MDL	MQL	DF	Date / Time Analyzed	By	Analytical Batch
4,6-Dinitro-o-cresol	<7.26	µg/L	7.26	10.0	1	11/22/22 00:52	VBW	L650114
2-Nitrophenol	<0.340	µg/L	0.340	5.00	1	11/22/22 00:52	VBW	L650114
4-Nitrophenol	<3.58	µg/L	3.58	10.0	1	11/22/22 00:52	VBW	L650114
Surrogate: 2-Fluorophenol	<b>0</b> *		Limits: 8-88%		1	11/22/22 00:52	VBW	L650114
Surrogate: Phenol-d6	<b>2.66</b> *		Limits: 7-58%		1	11/22/22 00:52	VBW	L650114
Surrogate: 2,4,6-Tribromophenol	<b>8.99</b> *		Limits: 16-138%		1	11/22/22 00:52	VBW	L650114

**Qualifiers/  
Definitions**

*	Outside QC Limit	DF	Dilution Factor
J	Estimated value	M	Minimum value
MQL	Method Quantitation Limit		

### Shipment Receipt Form

Customer Number: **11985**  
 Customer Name: **United Initiators, Inc**  
 Report Number: **22-319-0122**

#### Shipping Method

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

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Number of coolers/boxes received	<input type="text" value="1"/>		
Custody seals intact on shipping container/cooler?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Present
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Present
Chain of Custody (COC) present?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC agrees with sample label(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC properly completed	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Samples in proper containers?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sample containers intact?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sufficient sample volume for indicated test(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
All samples received within holding time?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler temperature in compliance?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Water - Sample containers properly preserved	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Water - VOA vials free of headspace	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Trip Blanks received with VOAs	<input type="radio"/> Yes	<input checked="" type="radio"/> No	<input type="radio"/> N/A
Soil VOA method 5035 – compliance criteria met	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
<input type="checkbox"/> High concentration container (48 hr)		<input type="checkbox"/> Low concentration EnCore samplers (48 hr)	
<input type="checkbox"/> High concentration pre-weighed (methanol -14 d)		<input type="checkbox"/> Low conc pre-weighed vials (Sod Bis -14 d)	
Special precautions or instructions included?	<input type="radio"/> Yes	<input checked="" type="radio"/> No	

Comments:

Signature:

Date & Time:

Kit ID:	164976
Initiated By:	Randy Thomas
Initiated Date:	3/7/2022
Project Comment	

CHAIN-OF-CUSTODY



22-319-0122  
 11985  
 11-15-2022  
 14:25:59

United Initiators, Inc  
 United Initiators, SPI, Inc.

Company Name	Company Number	Client Project Manager/Contact	Purchase Order Number
United Initiators, Inc	11985	Mr. Vic Forte	
Site Name	Project Number	<input type="checkbox"/> RUSH – Additional charges apply <input type="checkbox"/> Special Detection Limits(s) Date Results Needed	Method of Shipment <input type="checkbox"/> Fed Ex <input type="checkbox"/> UPS <input type="checkbox"/> USPS <input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off Other
United Initiators, SPI, Inc.			
LIMS Project ID	Project Manager Phone #	Project Manager Email	Site/Facility ID #
United Initiators - Semi-annual	870-572-2935	vic.forte@united-in.com	

Date	Time	Sample ID	Matrix	Grab/Comp	# of Cont	Container Type	Preservation	Analyses
11/15/22	1100	Grab	Aqueous	G	3	Glass Vial Amber - 40ml	NONE	VOC
1	1	Grab	Aqueous	G	1	Plastic - Pint	NaOH - Sodium Hydroxide	CNT
11/15/22	920 920	Composite	Aqueous	C	1	Plastic - Pint	HNO3 - Nitric Acid	Pb/Zn
1	1	Composite	Aqueous	C	2	Glass Amber - Liter	Na2S2O3 - Sodium Thiosulfate	SVOC

For Laboratory Use Only			Sampled by (Name - Print)	Client Remarks/Comments				
Ice	Custody	Lab Comments	<i>W Owens</i>					
<i>SPIN</i>	Seals		Relinquished by: (SIGNATURE)	Date	Time	Received by: (SIGNATURE)	Date	Time
	<i>Y/ND</i>		Relinquished by: (SIGNATURE)					
Blank/Cooler Temp			Relinquished by: (SIGNATURE)	Date	Time	Received by: (SIGNATURE)	Date	Time
<i>T-99</i>	<i>1.1c</i>		<i>W Owens</i>	<i>11/15/22</i>	<i>1415</i>	<i>W Owens</i>	<i>11/15/22</i>	<i>1415</i>
<i>wo</i>								

7/26/2022

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

Ref: Analytical Testing  
Lab Report Number: 22-196-0167  
Client Project Description: United Initiators, SPI, Inc.  
Process Waste Water

Dear Mr. Jeff Wages:

Waypoint Analytical, LLC. received sample(s) on 7/15/2022 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. Where the laboratory was not responsible for the sampling stage (refer to the chain of custody) results apply to the sample as received.

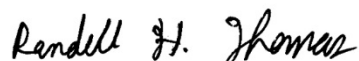
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2021) 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.

Certain parameters (chlorine, pH, dissolved oxygen, sulfite...) are required to be analyzed within 15 minutes of sampling. Usually, but not always, any field parameter analyzed at the laboratory is outside of this holding time. Refer to sample analysis time for confirmation of holding time compliance.

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.*



## Certification Summary

**Laboratory ID: WP MTN: Waypoint Analytical, LLC., Memphis, TN**

State	Program	Lab ID	Expiration Date
Alabama	State Program	40750	02/28/2023
Arkansas	State Program	88-0650	02/07/2023
California	State Program	2904	06/30/2023
Florida	State Program - NELAP	E871157	06/30/2023
Georgia	State Program	C044	02/18/2023
Georgia	State Program	04015	06/30/2023
Illinois	State Program - NELAP	200078	10/10/2022
Kentucky	State Program	80215	06/30/2022
Kentucky	State Program	KY90047	12/31/2022
Louisiana	State Program - NELAP	LA037	12/31/2022
Louisiana	State Program - NELAP	04015	06/30/2023
Mississippi	State Program	MS	02/11/2023
North Carolina	State Program	415	12/31/2022
Pennsylvania	State Program - NELAP	68-03195	05/31/2023
South Carolina	State Program	84002	06/30/2022
Tennessee	State Program	02027	02/11/2023
Texas	State Program - NELAP	T104704180	09/30/2022
Virginia	State Program	00106	06/30/2023
Virginia	State Program - NELAP	460181	09/14/2022



**Sample Summary Table**

**Report Number:** 22-196-0167  
**Client Project Description:** United Initiators, SPI, Inc.  
Process Waste Water

---

Lab No	Client Sample ID	Matrix	Date Collected	Date Received
81292	Process Waste Water	Aqueous	07/14/2022 08:50	07/15/2022

---



2790 Whitten Road, Memphis, TN 38133  
 Main 901.213.2400 ° Fax 901.213.2440  
 www.waypointanalytical.com

11985  
 United Initiators, Inc  
 Mr. Jeff Wages  
 334 Phillips 311 Road  
 Helena , AR 72342

Project United Initiators, SPI, Inc.  
 Information : Process Waste Water

Report Date : 07/26/2022  
 Received : 07/15/2022

Report Number : **22-196-0167**

**REPORT OF ANALYSIS**

Lab No : **81292**

Matrix: **Aqueous**

Sample ID : **Process Waste Water**

Sampled: **7/14/2022 8:50**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Lead	<50.0	µg/L	50.0	10	07/26/22 01:37	BKN	EPA-200.8
Zinc	<2000	µg/L	2000	10	07/26/22 01:37	BKN	EPA-200.8

**Qualifiers/  
 Definitions**

DF

Dilution Factor

MQL

Method Quantitation Limit



### Shipment Receipt Form

Customer Number: **11985**  
 Customer Name: **United Initiators, Inc**  
 Report Number: **22-196-0167**

#### Shipping Method

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

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Number of coolers/boxes received	<input type="text" value="1"/>		
Custody seals intact on shipping container/cooler?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Present
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Present
Chain of Custody (COC) present?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC agrees with sample label(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC properly completed	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Samples in proper containers?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sample containers intact?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sufficient sample volume for indicated test(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
All samples received within holding time?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler temperature in compliance?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	<input type="radio"/> Yes	<input checked="" type="radio"/> No	
Water - Sample containers properly preserved	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Water - VOA vials free of headspace	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Trip Blanks received with VOAs	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Soil VOA method 5035 – compliance criteria met	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
<input type="checkbox"/> High concentration container (48 hr)		<input type="checkbox"/> Low concentration EnCore samplers (48 hr)	
<input type="checkbox"/> High concentration pre-weighed (methanol -14 d)		<input type="checkbox"/> Low conc pre-weighed vials (Sod Bis -14 d)	
Special precautions or instructions included?	<input type="radio"/> Yes	<input checked="" type="radio"/> No	

Comments:

Signature:

Date & Time:



Kit ID:	186603
Initiated By:	Kenny Mulligan
Initiated Date:	7/5/2022
Project Comment	

CHAIN-OF-CUSTODY



22-196-0167  
 11985  
 07-15-2022  
 15:17:37  
 United Initiators, Inc  
 United Initiators, SPI, Inc.

Company Name		Company Number		Client Project Manager/Contact		Purchase Order Number		
United Initiators, Inc		11985		Mr. Jeff Wages				
Site Name		Project Number		<input type="checkbox"/> RUSH – Additional charges apply <input type="checkbox"/> Special Detection Limits(s) Date Results Needed		<b>Method of Shipment</b> <input checked="" type="checkbox"/> Fed Ex <input type="checkbox"/> UPS <input type="checkbox"/> USPS <input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off Other		
Process Water - Lead & Zinc								
LIMS Project ID		Project Manager Phone #		Project Manager Email		Site/Facility ID #		
United Initiators - Lead Zinc		870-572-3297		jeff.wages@united-in.com				
Date	Time	Sample ID	Matrix	Grab/Comp	# of Cont	Container Type	Preservation	Analyses
7/14/22	08:50	Process Waste Water	AQU	G	1	Plastic - Pint	HNO3 - Nitric Acid	Pb/Zn

For Laboratory Use Only			Sampled by (Name - Print)		Client Remarks/Comments					
Ice	Custody Seals	Lab Comments	Jeff Wages							
Y/N	Y/N		Relinquished by: (SIGNATURE)		Date	Time	Received by: (SIGNATURE)		Date	Time
			Jeff Wages		7/14/22	08:50				
			Relinquished by: (SIGNATURE)				Received by: (SIGNATURE)			
Blank/Cooler Temp			Relinquished by: (SIGNATURE)		Date	Time	Received by: (SIGNATURE)		Date	Time
N/A							[Signature]		0845	07/15/2022