

Wilson, Tabatha

From: Gilliam, Allen
Sent: Monday, September 29, 2014 1:25 PM
To: jeff.wages@united-in.com
Cc: Jon.Cummins@united-in.com; Wilson, Tabatha; Fuller, Kim; helenawater@sbcglobal.net
Subject: AR0043389_United Initiators SPI ARP001013 Aug 2014 semi annual Pretreatment Report with ADEQ reply_20140929
Attachments: United Initiators SPI Inc 14-247-0315 20140915 report_far_3114708-351.PDF; United Initiators SPI Inc 14-247-0316 20140911 report_far_3111819-349.PDF; UI SPI Wastewater Report 1409.pdf; Wastewater Composite SOP 1409.pdf

Jeff,

United Initiators' (UI) corrected August 2014 semi-annual Pretreatment report (3rd attachment) and supporting analyticals were electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically with the concentration limits in 40 CFR 414.111 using the calculated dilution factor of ~0.92 per the combined wastestream formula in 40 CFR 403.6(e)(1)(i). The footnotes denoting this dilution factor should be included on all future semi-annual reports.

This office can still not locate the basis for UI's Lead and Zinc "daily maximum" and "maximum for any monthly average". It would be important if you could provide the (much lower) Pb and Zn limits Mr. Torrence had calculated for you. Although UI is in compliance with those calculated limits, it would be prudent to have the basis for those limits to be on file.

If you cannot find those limits' basis, a short description of why Mr. Torrence "cut" the Pb and Zn limits would be adequate.

Thank you for your cooperation and remaining in compliance with the Federal Pretreatment Program per 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: Jeff Wages [<mailto:Jeff.Wages@united-in.com>]
Sent: Tuesday, September 23, 2014 2:23 PM
To: Gilliam, Allen
Cc: Jon.Cummins@united-in.com
Subject: United Initiators SPI, Inc. Wastewater Report follow-up

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 SPI, 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.

<<United Initiators SPI Inc 14-247-0315 20140915 report_far_3114708-351.PDF>> <<United Initiators SPI Inc 14-247-0316 20140911 report_far_3111819-349.PDF>> <<UI SPI Wastewater Report 1409.pdf>>

<<Wastewater Composite SOP 1409.pdf>>

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 SPI, INC
334 Phillips 311 Road
Helena, AR 72342

www.united-initiators.com

This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain information that is confidential or legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify the sender by telephone or return e-mail and delete the original transmission and its attachments without reading or saving in any manner. Thank you.

9/15/2014

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

Ref: Analytical Testing
ETC Report Number: 14-247-0315
Client Project Description: United Initiators, SPI, Inc.

Dear Mr. Jeff Wages:

Environmental Testing and Consulting, Inc. received sample(s) on 9/4/2014 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.

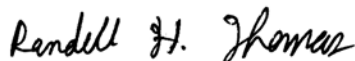
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established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



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: 14-247-0315
Date: 9/15/2014

CASE NARRATIVE

Metals Analyses Method EPA-200.8

QC Batch No: L211498

Results calculated in ppb using the assumed specific gravity of seawater - 1.025 - as agreed.



ENVIRONMENTAL TESTING & CONSULTING, INC.

www.etcmemphis.com

2790 Whitten Road

Memphis, Tennessee 38133

(901) 213-2400

Fax (901) 213-2440

"A Laboratory Management Partner"

05424

Rineco Analytical Services

Mr. Jeff Wages

P O Box 729

Benton , AR 72018

Project United Initiators, SPI, Inc.

Information :

Report Date : 9/15/2014

Report Number : **14-247-0315**

REPORT OF ANALYSIS

Received : 9/4/2014

Lab No : **91947**

Sample ID : **Effluent**

Matrix: **Aqueous**

Sampled: **9/3/2014 14:10**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Lead	<2.50	µg/L	2.50	5	09/11/14 13:42	RQE	EPA-200.8
Total Zinc	<25.0	µg/L	25.0	5	09/11/14 13:42	RQE	EPA-200.8

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: **14-247-0315**

Shipping Method

Fed Ex US Postal Lab Other :
 UPS Client Courier Thermometer ID: #5

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Custody seals intact on shipping container/cooler?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
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 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:

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



14-247-0315
05424
09-04-2014
16:50:50

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 3 Processes			FID Number	
Project Process Waste Water		Project Number		PO Number			
Project Manager / Contact Rineco Analytical Services Jeff Wages				E-mail jeff.wages@united-in.com			
Sample ID	Container Type	Collected Date / Time	# Cont	Preservative	Grab / Comp	Matrix	Analyses
Composite	Plastic - Pint	14510 9/3/14	1	HNO3 - Nitric Acid	C	Aqueous	Pb/Zn

Sampled By J Wages	Method of Shipment	Blank / Cooler Temperature 0.0c FHS	Remarks
Relinquished By (sign) J Wages	Date / Time 9/4/14 10:00	Received By (sign) <i>[Signature]</i>	Date / Time 9.4.14 1005
Relinquished By (sign)	Date / Time	Received By (sign)	Date / Time
Relinquished By (sign) <i>[Signature]</i>	Date / Time 9/4/14 1640	Received by Lab (sign) <i>[Signature]</i>	Date / Time 9/4/14 1640

9/11/2014

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

Ref: Analytical Testing
ETC Report Number: 14-247-0316
Client Project Description: United Initiators, SPI, Inc.
Semi-annual Sampling

Dear Ms. Mia Dixon:

Environmental Testing and Consulting, Inc. received sample(s) on 9/4/2014 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.

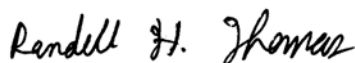
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established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



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: 14-247-0316
Date: 9/11/2014

CASE NARRATIVE

Semivolatile Organic Compounds - GC/MS Method EPA-625

Sample 91949 (Composite 9/3-4/14)

QC Batch No: L211291

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: L211003

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.



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 : 09/11/2014
Received : 9/4/2014

Report Number : **14-247-0316**

REPORT OF ANALYSIS

Lab No : **91948**
Sample ID : **Grab**

Matrix: **Aqueous**
Sampled: **9/4/2014 10:20**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<5.00	µg/L	5.00	1	09/05/14 11:05	EWB	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 : 09/11/2014
Received : 9/4/2014

Report Number : **14-247-0316**

REPORT OF ANALYSIS

Lab No : **91948**
Sample ID : **Grab**

Matrix: **Aqueous**
Sampled: **9/4/2014 10:20**

Analytical Method: 624

Prep Method: EPA-624 (PREP)

Prep Batch(es): L211058

Date/Time Prepped: 9/5/2014 13:36:00

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Batch
Benzene	2.24	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
Carbon Tetrachloride	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
Chlorobenzene	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
Chloroethane	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
Chloroform	9.72	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
Methyl Chloride	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
1,1-Dichloroethane	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
1,2-Dichloroethane	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
1,1-Dichloroethylene	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
1,2-trans-Dichloroethylene	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
1,2-Dichloropropane	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
cis-1,3-Dichloropropene	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
trans-1,3-Dichloropropene	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
1,3-Dichloropropylene	<1.00	µg/L	1.00	1	09/05/14 21:59		L211066
Ethylbenzene	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
Methylene Chloride	<10.0	µg/L	10.0	1	09/05/14 21:59	SEB	L211066
Tetrachloroethylene	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
Toluene	<5.00	µg/L	5.00	1	09/05/14 21:59	SEB	L211066
1,1,1-Trichloroethane	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
1,1,2-Trichloroethane	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
Trichloroethylene	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066

Qualifiers/ * Outside QC limit
Definitions I Recovery out of range

DF Dilution Factor
MQL Method Quantitation Limit



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 : 09/11/2014
Received : 9/4/2014

Report Number : **14-247-0316**

REPORT OF ANALYSIS

Lab No : **91948**
Sample ID : **Grab**

Matrix: **Aqueous**
Sampled: **9/4/2014 10:20**

Analytical Method: 624

Prep Method: EPA-624 (PREP)

Prep Batch(es): L211058

Date/Time Prepped: 9/5/2014 13:36:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Vinyl Chloride	<1.00	µg/L	1.00	1	09/05/14 21:59	SEB	L211066
Surrogate: 4-Bromofluorobenzene	114		Limits: 71-131%	1	09/05/14 21:59	SEB	L211066
Surrogate: Dibromofluoromethane	112		Limits: 70-128%	1	09/05/14 21:59	SEB	L211066
Surrogate: 1,2-Dichloroethane - d4	125		Limits: 67-136%	1	09/05/14 21:59	SEB	L211066
Surrogate: Toluene-d8	108		Limits: 70-130%	1	09/05/14 21:59	SEB	L211066

Qualifiers/ Definitions

*
I

Outside QC limit
Recovery out of range

DF Dilution Factor
MQL Method Quantitation Limit



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ENVIRONMENTAL TESTING & CONSULTING, INC.

2790 Whitten Road

Memphis, Tennessee 38133

(901) 213-2400

Fax (901) 213-2440

"A Laboratory Management Partner"

05424

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

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

Report Date : 09/11/2014
Received : 9/4/2014

Report Number : **14-247-0316**

REPORT OF ANALYSIS

Lab No : **91949**

Matrix: **Aqueous**

Sample ID : **Composite 9/3-4/14**

Sampled: **9/4/2014 0:00**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Lead	<0.500	µg/L	0.500	1	09/05/14 15:43	RQE	EPA-200.8
Total Zinc	69.3	µg/L	5.00	1	09/05/14 15:43	RQE	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 : 09/11/2014
 Received : 9/4/2014

Report Number : **14-247-0316**

REPORT OF ANALYSIS

Lab No : **91949**
 Sample ID : **Composite 9/3-4/14**

Matrix: **Aqueous**
 Sampled: **9/4/2014 0:00**

Analytical Method: 625

Prep Method: 625

Prep Batch(es): L211003

Date/Time Prepped: 9/5/2014 14:10:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
Acenaphthene	<8.00	µg/L	8.00	1	09/08/14 18:54	BMP	L211291
Anthracene	<8.00	µg/L	8.00	1	09/08/14 18:54	BMP	L211291
Bis(2-ethylhexyl)phthalate	<40.0	µg/L	40.0	1	09/08/14 18:54	BMP	L211291
1,2-Dichlorobenzene	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
1,3-Dichlorobenzene	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
1,4-Dichlorobenzene	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
Diethyl phthalate	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
Dimethyl phthalate	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
Di-n-butyl phthalate	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
4,6-Dinitro-o-cresol	<40.0	µg/L	40.0	1	09/08/14 18:54	BMP	L211291
Fluoranthene	<8.00	µg/L	8.00	1	09/08/14 18:54	BMP	L211291
Fluorene	<8.00	µg/L	8.00	1	09/08/14 18:54	BMP	L211291
Hexachlorobenzene	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
Hexachlorobutadiene	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
Hexachloroethane	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
Naphthalene	<8.00	µg/L	8.00	1	09/08/14 18:54	BMP	L211291
Nitrobenzene	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
2-Nitrophenol	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
4-Nitrophenol	<80.0	µg/L	80.0	1	09/08/14 18:54	BMP	L211291
Phenanthrene	<8.00	µg/L	8.00	1	09/08/14 18:54	BMP	L211291
Pyrene	<8.00	µg/L	8.00	1	09/08/14 18:54	BMP	L211291

Qualifiers/ * Outside QC limit
Definitions I Recovery out of range

DF Dilution Factor
 MQL Method Quantitation Limit



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 : 09/11/2014
Received : 9/4/2014

Report Number : **14-247-0316**

REPORT OF ANALYSIS

Lab No : **91949**

Matrix: **Aqueous**

Sample ID : **Composite 9/3-4/14**

Sampled: **9/4/2014 0:00**

Analytical Method: 625

Prep Method: 625

Prep Batch(es): L211003

Date/Time Prepped: 9/5/2014 14:10:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Batch
1,2,4-Trichlorobenzene	<20.0	µg/L	20.0	1	09/08/14 18:54	BMP	L211291
Surrogate: 2-Fluorobiphenyl	18.8 *		Limits: 38-107%	1	09/08/14 18:54	BMP	L211291
Surrogate: 2-Fluorophenol	26.6		Limits: 8-88%	1	09/08/14 18:54	BMP	L211291
Surrogate: Nitrobenzene-d5	46.8		Limits: 29-105%	1	09/08/14 18:54	BMP	L211291
Surrogate: Phenol-d6	23.1		Limits: 7-58%	1	09/08/14 18:54	BMP	L211291
Surrogate: 4-Terphenyl-d14	72.3		Limits: 30-130%	1	09/08/14 18:54	BMP	L211291
Surrogate: 2,4,6-Tribromophenol	80.8		Limits: 16-138%	1	09/08/14 18:54	BMP	L211291

**Qualifiers/
Definitions**

* Outside QC limit
I Recovery out of range

DF Dilution Factor
MQL Method Quantitation Limit

Cooler Receipt Form

Customer Number: **05424**

Customer Name: **Rineco Analytical Services**

Report Number: **14-247-0316**

Shipping Method

Fed Ex US Postal Lab Other :
 UPS Client Courier Thermometer ID: #5

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Custody seals intact on shipping container/cooler?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
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 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:

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

14-247-0316
05424
09-04-2014
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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	9-4-14 10:20	3	HCL - Hydrochloric Acid	G	Aqueous	VOC		
Grab	Plastic - Pint	↓ ↓	1	NaOH - Sodium Hydroxide	G	Aqueous	CNT		
Composite	Plastic - Pint	9/3/14 -	1	HNO3 - Nitric Acid	C	Aqueous	Pb/Zn		
Composite	Glass Amber - Liter	↓ ↓	2	Na2S2O3 - Sodium Thiosulfate	C	Aqueous	SVOC		

Sampled By <i>John A. Goolsby</i>	Method of Shipment	Blank / Cooler Temperature 0.1°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) <i>[Signature]</i>	Date / Time 9/4/14 1:45	Received by Lab (sign) <i>[Signature]</i>	Date / Time 9/4/14	



United Initiators SPI, 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


15 September 2014

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



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 United Initiators SPI, Inc. 334 Phillips 311 Road Helena, AR 72342-9033	B. FACILITY & LOCATION ADDRESS United Initiators SPI, Inc. 334 Phillips 311 Road Helena, AR 72342-9033
C. FACILITY CONTACT: Jeff Wages e-mail address <u>jeff.wages@united-in.com</u>	TELEPHONE NUMBER: 870.572.2935 x307

(2) REPORTING PERIOD

A. MONTHS WHICH REPORTS ARE DUE <u>February</u> & <u>August</u>	B. PERIOD COVERED BY THIS REPORT FROM: February 2014 TO: August 2014
---	--

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES <u>CORE PROCESS(ES)</u> Specify Category and Sub-Categor(ies) Check each applicable Subpart <input type="checkbox"/> Subpart A--General <input type="checkbox"/> Subpart B--Rayon Fibers <input type="checkbox"/> Subpart C--Other Fibers <input type="checkbox"/> Subpart D--Thermoplastic Resins <input type="checkbox"/> Subpart E--Thermosetting Resins <input type="checkbox"/> Subpart F--Commodity Organic Chemicals <input type="checkbox"/> Subpart G--Bulk Organic Chemicals <input checked="" type="checkbox"/> Subpart H--Specialty Organic Chemicals	B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE. C. Number of Regular Employees at this Facility <u>43</u>
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(4) FLOW MEASUREMENT

A. Total Plant Flow to POTW in Gallons per Day	
Average: <u>67,153</u> gpd	Maximum: <u>70,005</u> 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	66,423	69,244	Batch & continuous
Unregulated*			
Cooling Water			
**Sanitary	730	761	

*"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 for any 1 day (ug/l)	Measured Max for any <u>monthly</u> avg (ug/l)
	**Max for any 1 day	**Max for any monthly avg		
Effluent characteristics				
Acenaphthene	44	18	<8.00	<8.00
Anthracene	44	18	<8.00	<8.00
Benzene	125	53	2.24	2.24
Bis(2-ethylhexyl) phthalate	240	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	302	103	9.72	9.72
Di-n-butyl phthalate	40	19	<20.0	<20.0
1,2-Dichlorobenzene	738	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	534	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	738	182	<1.00	<1.00
1,3-Dichloropropylene	738	182	<1.00	<1.00
Diethyl phthalate	105	43	<20.0	<20.0
Dimethyl phthalate	44	18	<20.0	<20.0
4,6-Dinitro-o-cresol	258	73	<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	738	182	<20.0	<20.0
Hexachlorobutadiene	353	132	<20.0	<20.0
Hexachloroethane	738	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	5,952	2,080	<20.0	<20.0
2-Nitrophenol	215	60	<20.0	<20.0
4-Nitrophenol	536	151	<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	1,116	391	<5.00	<5.00
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	738	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 SPI processes to be analyzed for lead and zinc. ETC Report Number: 14-247-0315 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

9/23/2014

DATE SIGNED