



September 21, 2021

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 February 1 through July 31, 2021. 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.

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  
Wastewater Analysis Laboratory Reports

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

# 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, Inc.**  
**334 Phillips 311 Road**  
**Helena, AR 72342-9033**

B. FACILITY & LOCATION ADDRESS

**United Initiators, Inc.**  
**334 Phillips 311 Road**  
**Helena, AR 72342-9033**

C. FACILITY CONTACT: **Vic Forte**  
 e-mail address vic.forte@united-in.com

TELEPHONE NUMBER: **(870)572-2935 x 336**

## (2) REPORTING PERIOD

A. MONTHS WHICH REPORTS ARE DUE

February & August

B. PERIOD COVERED BY THIS REPORT

FROM: February 1, 2021 TO: July 30, 2021

## (3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

### CORE PROCESS(ES)

Specify Category and Sub-Categor(ies)

Check each applicable Subpart

- Subpart A--General
- Subpart B--Rayon Fibers
- Subpart C--Other Fibers
- Subpart D--Thermoplastic Resins
- Subpart E--Thermosetting Resins
- Subpart F--Commodity Organic Chemicals
- Subpart G--Bulk Organic Chemicals
- Subpart H--Specialty Organic Chemicals
- Subpart I--[Reserved]

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 68.08 (ave during period) \_\_\_\_\_

## (4) FLOW MEASUREMENT

A. Total Plant Flow to POTW in Gallons per Day

Average: 36,894 gpd

Maximum: 90,685 gpd

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

**(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     | 35,880                  | 88,191                  | Batch & Continuous             |
| Unregulated*  |                         |                         |                                |
| Cooling Water |                         |                         |                                |
| Sanitary      | 1,014                   | 2,493                   | Continuous                     |

\*"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

**(5) MEASUREMENT OF POLLUTANTS**

**A. TYPE OF TREATMENT SYSTEM**

CHECK EACH APPLICABLE BLOCK

- Neutralization
- Chemical Precipitation and Sedimentation
- Biological
- Cyanide Destruction
- Other \_\_\_\_\_
- 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 <u>monthly</u> avg (ug/l) |
|---------------------------------|-----------------------------|-------------------------|-----------------------------------|--|
|                                 | Max for any 1 day           | Max for any monthly avg |                                   |  |
| <b>Effluent characteristics</b> |                             |                         |                                   |  |
| Acenaphthene                    | 43                          | 17                      | <20.0                             | <20.0  |
| Anthracene                      | 43                          | 17                      | <20.0                             | <20.0  |
| Benzene                         | 122                         | 52                      | 6.79                              | 6.79   |
| Bis(2-ethylhexyl) phthalate     | 236                         | 87                      | <100.0                            | <100.0   |
| Carbon Tetrachloride            | 347                         | 130                     | <1.0                              | <1.0   |
| Chlorobenzene                   | 347                         | 130                     | <1.0                              | <1.0   |
| Chloroethane                    | 270                         | 101                     | <1.0                              | <1.0   |
| Chloroform                      | 297                         | 101                     | <1.0                              | <1.0   |
| Di-n-butyl phthalate            | 39                          | 18                      | <50.0                             | <50.0  |
| 1,2-Dichlorobenzene             | 726                         | 179                     | <1.0                              | <1.0   |
| 1,3-Dichlorobenzene             | 347                         | 130                     | <1.0                              | <1.0   |
| 1,4-Dichlorobenzene             | 347                         | 130                     | <1.0                              | <1.0   |
| 1,1-Dichloroethane              | 54                          | 20                      | <1.0                              | <1.0   |

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

|                            |        |      |             |             |
|----------------------------|--------|------|-------------|-------------|
| 1,2-Dichloroethane         | 525    | 165  | <1.0        | <1.0        |
| 1,1-Dichloroethylene       | 55     | 20   | <1.0        | <1.0        |
| 1,2-trans-Dichloroethylene | 60     | 23   | <1.0        | <1.0        |
| 1,2-Dichloropropane        | 726    | 179  | <1.0        | <1.0        |
| 1,3-Dichloropropylene      | 726    | 179  | <1.0        | <1.0        |
| Diethyl phthalate          | 103    | 42   | <50.0       | <50.0       |
| Dimethyl phthalate         | 43     | 17   | <50.0       | <25.0       |
| 4,6-Dinitro-o-cresol       | 253    | 71   | <100        | <100        |
| Ethylbenzene               | 347    | 130  | <1.0        | <1.0        |
| Fluoranthene               | 49     | 20   | <20.0       | <20.0       |
| Fluorene                   | 43     | 17   | <20.0       | <20.0       |
| Hexachlorobenzene          | 726    | 179  | <50.0       | <50.0       |
| Hexachlorobutadiene        | 347    | 130  | <50.0       | <50.0       |
| Hexachloroethane           | 726    | 179  | <50.0       | <50.0       |
| Methyl Chloride            | 270    | 101  | <1.0        | <1.0        |
| Methylene Chloride         | 155    | 33   | <10         | <10         |
| Naphthalene                | 43     | 17   | <20.0       | <20.0       |
| Nitrobenzene               | 5852   | 2045 | <50.0       | <50.0       |
| 2-Nitrophenol              | 211    | 59   | <50         | <50         |
| 4-Nitrophenol              | 527    | 148  | <100        | <100        |
| Phenanthrene               | 43     | 17   | <20.0       | <20.0       |
| Pyrene                     | 44     | 18   | <20.0       | <20.0       |
| Tetrachloroethylene        | 150    | 48   | <1.0        | <1.0        |
| Toluene                    | 68     | 26   | <b>32.9</b> | <b>32.9</b> |
| Total Cyanide              | 1097.0 | 384  | 16          | 16          |
| Total Lead                 | 57.6   | 57.6 | <0.0600     | <0.0600     |
| Total Zinc <sup>2</sup>    | 134    | 134  | <0.200      | <0.200      |
| 1,2,4-Trichlorobenzene     | 726    | 179  | <50.0       | <50.0       |
| 1,1,1-Trichloroethane      | 54     | 20   | <1.0        | <1.0        |
| 1,1,2-Trichloroethane      | 116    | 29   | <1.0        | <1.0        |
| Trichloroethylene          | 63     | 24   | <1.0        | <1.0        |
| Vinyl Chloride             | 157    | 89   | <1.0        | <1.0        |

**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 21-160-0046).

The attached analytical Report (21-145-0124) indicates the total Toluene concentration in the sample to be 32.9 µg/L. Our calculated maximum for any monthly average for Toluene is 68 µg/L and the maximum for any one day is 26 µg/L.

The only sources for Toluene at this facility is as a contaminant contained in the Benzoyl Chloride. Benzoyl Chloride is an ingredient used when manufacturing Benzoyl Peroxide and the Benzoyl Chloride has a very small fraction of Toluene (0.2%) in it. During the Benzoyl Peroxide manufacturing process, a wet scrubber is used to neutralize any emissions of Benzoyl Chloride and these scrubber liquids could potentially contain toluene.

(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

9/21/2021  
DATE SIGNED

6/1/2021

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

Ref: Analytical Testing  
Lab Report Number: 21-145-0124  
Client Project Description: United Initiators, SPI, Inc.  
Semi-annual Sampling

Dear Mr. Jeff Wages:

Waypoint Analytical, LLC. received sample(s) on 5/25/2021 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.

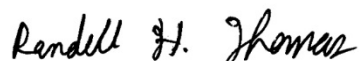
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule August 2017) 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      | 02/28/2022      |
| Arkansas       | State Program         | 88-0650    | 02/07/2022      |
| California     | State Program         | 2904       | 06/30/2021      |
| Florida        | State Program - NELAP | E871157    | 06/30/2021      |
| Georgia        | State Program         | C044       | 02/18/2023      |
| Georgia        | State Program         | 04015      | 06/30/2021      |
| Illinois       | State Program - NELAP | 200078     | 10/10/2021      |
| Kentucky       | State Program         | 80215      | 06/30/2021      |
| Kentucky       | State Program         | KY90047    | 12/31/2021      |
| Louisiana      | State Program - NELAP | LA037      | 12/31/2021      |
| Louisiana      | State Program - NELAP | 04015      | 06/30/2021      |
| Mississippi    | State Program         | MS         | 02/11/2023      |
| North Carolina | State Program         | 415        | 12/31/2021      |
| Oklahoma       | State Program         | 9311       | 08/31/2021      |
| Pennsylvania   | State Program - NELAP | 68-03195   | 05/31/2022      |
| South Carolina | State Program         | 84002      | 06/30/2021      |
| South Carolina | State Program         | 84002      | 06/30/2021      |
| Tennessee      | State Program         | 02027      | 02/11/2023      |
| Tennessee      | A2LA ISO 17025:2017   | 4313.01    | 10/31/2021      |
| Texas          | State Program - NELAP | T104704180 | 09/30/2021      |
| Virginia       | State Program         | 00106      | 06/30/2021      |
| Virginia       | State Program - NELAP | 460181     | 09/14/2021      |

**Sample Summary Table**

**Report Number:** 21-145-0124  
**Client Project Description:** United Initiators, SPI, Inc.  
Semi-annual Sampling

| Lab No | Client Sample ID | Matrix  | Date Collected   | Date Received |
|--------|------------------|---------|------------------|---------------|
| 89264  | Grab             | Aqueous | 05/25/2021 10:45 | 05/25/2021    |
| 89265  | Composite        | Aqueous | 05/25/2021 10:15 | 05/25/2021    |
| 89266  | Composite        | Aqueous | 05/25/2021 10:15 | 05/25/2021    |





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Client: United Initiators, Inc  
Project: United Initiators, SPI, Inc.  
Lab Report Number: 21-145-0124  
Date: 6/1/2021

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**CASE NARRATIVE**

**Metals Analyses Method EPA-200.8**

Sample 89265 (Composite)

Analyte: Lead

QC Batch No: L555360/L555094

One or more Internal Standards are outside method acceptance criteria. Re-analysis and/or sample dilutions are required.

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

QC Batch No: L555917/L555711

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

QC Batch No: L555917/L555711

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.

Sample 89266 (Composite)

QC Batch No: L555917/L555711

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

QC Batch No: L555917/L555711

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.



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 : Semi-annual Sampling

Report Date : 06/01/2021  
 Received : 05/25/2021

Report Number : **21-145-0124**

**REPORT OF ANALYSIS**

Lab No : **89264**  
 Sample ID : **Grab**

Matrix: **Aqueous**  
 Sampled: **5/25/2021 10:45**

| Test           | Results     | Units | MQL  | DF | Date / Time Analyzed | By  | Analytical Method |
|----------------|-------------|-------|------|----|----------------------|-----|-------------------|
| Cyanide, Total | <b>16.0</b> | µg/L  | 5.00 | 1  | 06/01/21 10:40       | FMM | 4500CNE-2011      |

**Qualifiers/  
 Definitions**

|   |                  |     |                           |
|---|------------------|-----|---------------------------|
| * | Outside QC Limit | DF  | Dilution Factor           |
| L | Limit Exceeded   | MQL | Method Quantitation Limit |

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Information : Semi-annual Sampling

Report Date : 06/01/2021  
Received : 05/25/2021

Report Number : **21-145-0124**

**REPORT OF ANALYSIS**

Lab No : **89264**

Matrix: **Aqueous**

Sample ID : **Grab**

Sampled: **5/25/2021 10:45**

**Analytical Method:** 624.1                      **Prep Batch(es):** **L555885** 05/28/21 21:21  
**Prep Method:** 624.1

| Test                       | Results     | Units | MQL  | DF | Date / Time Analyzed | By  | Analytical Batch |
|----------------------------|-------------|-------|------|----|----------------------|-----|------------------|
| Benzene                    | <b>6.79</b> | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| Carbon Tetrachloride       | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| Chlorobenzene              | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| Chloroethane               | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| Chloroform                 | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| Methyl Chloride            | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| 1,2-Dichlorobenzene        | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| 1,3-Dichlorobenzene        | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| 1,4-Dichlorobenzene        | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| 1,1-Dichloroethane         | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| 1,2-Dichloroethane         | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| 1,1-Dichloroethylene       | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| 1,2-trans-Dichloroethylene | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| 1,2-Dichloropropane        | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| cis-1,3-Dichloropropene    | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| trans-1,3-Dichloropropene  | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| 1,3-Dichloropropylene      | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       |     | L555936          |
| Ethylbenzene               | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| Methylene Chloride         | <10.0       | µg/L  | 10.0 | 1  | 05/29/21 04:37       | CLB | L555936          |
| Tetrachloroethylene        | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| Toluene                    | <b>32.9</b> | µg/L  | 5.00 | 1  | 05/29/21 04:37       | CLB | L555936          |
| 1,1,1-Trichloroethane      | <1.00       | µg/L  | 1.00 | 1  | 05/29/21 04:37       | CLB | L555936          |

**Qualifiers/** \* Outside QC Limit                      DF Dilution Factor  
**Definitions** 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

Report Date : 06/01/2021  
Received : 05/25/2021

Report Number : **21-145-0124**

**REPORT OF ANALYSIS**

Lab No : **89264**

Matrix: **Aqueous**

Sample ID : **Grab**

Sampled: **5/25/2021 10:45**

**Analytical Method:** 624.1 **Prep Batch(es):** **L555885** 05/28/21 21:21

**Prep Method:** 624.1

| Test                               | Results | Units | MQL             | DF | Date / Time Analyzed | By  | Analytical Batch |
|------------------------------------|---------|-------|-----------------|----|----------------------|-----|------------------|
| 1,1,2-Trichloroethane              | <1.00   | µg/L  | 1.00            | 1  | 05/29/21 04:37       | CLB | L555936          |
| Trichloroethylene                  | <1.00   | µg/L  | 1.00            | 1  | 05/29/21 04:37       | CLB | L555936          |
| Vinyl Chloride                     | <1.00   | µg/L  | 1.00            | 1  | 05/29/21 04:37       | CLB | L555936          |
| Surrogate: 4-Bromofluorobenzene    | 93.2    |       | Limits: 71-131% | 1  | 05/29/21 04:37       | CLB | L555936          |
| Surrogate: Dibromofluoromethane    | 96.0    |       | Limits: 70-128% | 1  | 05/29/21 04:37       | CLB | L555936          |
| Surrogate: 1,2-Dichloroethane - d4 | 103     |       | Limits: 67-136% | 1  | 05/29/21 04:37       | CLB | L555936          |
| Surrogate: Toluene-d8              | 99.2    |       | Limits: 70-130% | 1  | 05/29/21 04:37       | CLB | L555936          |

**Qualifiers/  
Definitions**

\* Outside QC Limit  
MQL Method Quantitation Limit

DF Dilution Factor



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 334 Phillips 311 Road  
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Project United Initiators, SPI, Inc.  
 Information : Semi-annual Sampling

Report Date : 06/01/2021  
 Received : 05/25/2021

Report Number : **21-145-0124**

**REPORT OF ANALYSIS**

Lab No : **89265**  
 Sample ID : **Composite**

Matrix: **Aqueous**  
 Sampled: **5/25/2021 10:15**

| Test | Results    | Units | MQL  | DF | Date / Time Analyzed | By  | Analytical Method |
|------|------------|-------|------|----|----------------------|-----|-------------------|
| Lead | <2.50      | µg/L  | 2.50 | 5  | 05/28/21 13:44       | BKN | EPA-200.8         |
| Zinc | <b>167</b> | µg/L  | 20.0 | 1  | 05/27/21 01:50       | BKN | EPA-200.8         |

| Qualifiers/ Definitions | * | Outside QC Limit | DF  | Dilution Factor           |
|-------------------------|---|------------------|-----|---------------------------|
|                         | L | Limit Exceeded   | MQL | Method Quantitation Limit |

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Information : Semi-annual Sampling

Report Date : 06/01/2021  
Received : 05/25/2021

Report Number : **21-145-0124**

**REPORT OF ANALYSIS**

Lab No : **89265**

Matrix: **Aqueous**

Sample ID : **Composite**

Sampled: **5/25/2021 10:15**

**Analytical Method:** 625.1

**Prep Batch(es):** **L555711** 05/28/21 13:00

**Prep Method:** 625.1

| Test                        | Results       | Units | MLQ             | DF | Date / Time Analyzed | By  | Analytical Batch |
|-----------------------------|---------------|-------|-----------------|----|----------------------|-----|------------------|
| Acenaphthene                | <20.0         | µg/L  | 20.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Anthracene                  | <20.0         | µg/L  | 20.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Bis(2-ethylhexyl)phthalate  | <100          | µg/L  | 100             | 10 | 05/28/21 20:10       | VBW | L555917          |
| Diethyl phthalate           | <50.0         | µg/L  | 50.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Dimethyl phthalate          | <50.0         | µg/L  | 50.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Di-n-butyl phthalate        | <50.0         | µg/L  | 50.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Fluoranthene                | <20.0         | µg/L  | 20.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Fluorene                    | <20.0         | µg/L  | 20.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Hexachlorobenzene           | <50.0         | µg/L  | 50.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Hexachlorobutadiene         | <50.0         | µg/L  | 50.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Hexachloroethane            | <50.0         | µg/L  | 50.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Naphthalene                 | <20.0         | µg/L  | 20.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Nitrobenzene                | <50.0         | µg/L  | 50.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Phenanthrene                | <20.0         | µg/L  | 20.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Pyrene                      | <20.0         | µg/L  | 20.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| 1,2,4-Trichlorobenzene      | <50.0         | µg/L  | 50.0            | 10 | 05/28/21 20:10       | VBW | L555917          |
| Surrogate: 2-Fluorobiphenyl | 50.4          |       | Limits: 30-107% | 10 | 05/28/21 20:10       | VBW | L555917          |
| Surrogate: Nitrobenzene-d5  | 54.3          |       | Limits: 29-105% | 10 | 05/28/21 20:10       | VBW | L555917          |
| Surrogate: 4-Terphenyl-d14  | <b>26.3 *</b> |       | Limits: 30-130% | 10 | 05/28/21 20:10       | VBW | L555917          |

**Qualifiers/  
Definitions**

\* Outside QC Limit  
MLQ Method Quantitation Limit

DF Dilution Factor

11985

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

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

Report Date : 06/01/2021  
Received : 05/25/2021

Report Number : **21-145-0124**

**REPORT OF ANALYSIS**

Lab No : **89266**

Matrix: **Aqueous**

Sample ID : **Composite**

Sampled: **5/25/2021 10:15**

**Analytical Method:** 625.1

**Prep Batch(es):** **L555711** 05/28/21 13:00

**Prep Method:** 625.1

| Test                            | Results       | Units | ML              | DF | Date / Time Analyzed | By  | Analytical Batch |
|---------------------------------|---------------|-------|-----------------|----|----------------------|-----|------------------|
| 4,6-Dinitro-o-cresol            | <100          | µg/L  | 100             | 10 | 05/28/21 20:32       | VBW | L555917          |
| 2-Nitrophenol                   | <50.0         | µg/L  | 50.0            | 10 | 05/28/21 20:32       | VBW | L555917          |
| 4-Nitrophenol                   | <100          | µg/L  | 100             | 10 | 05/28/21 20:32       | VBW | L555917          |
| Surrogate: 2-Fluorophenol       | <b>4.78</b> * |       | Limits: 8-88%   | 10 | 05/28/21 20:32       | VBW | L555917          |
| Surrogate: Phenol-d6            | <b>3.81</b> * |       | Limits: 7-58%   | 10 | 05/28/21 20:32       | VBW | L555917          |
| Surrogate: 2,4,6-Tribromophenol | 20.2          |       | Limits: 16-138% | 10 | 05/28/21 20:32       | VBW | L555917          |

**Qualifiers/  
Definitions**

\* Outside QC Limit  
MQL Method Quantitation Limit

DF Dilution Factor

### Shipment Receipt Form

Customer Number: **11985**  
 Customer Name: **United Initiators, Inc**  
 Report Number: **21-145-0124**

#### 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.<br>Samples were considered acceptable as cooling<br>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:         | 136803       |
| Initiated By:   | Randy Thomas |
| Initiated Date: | 10/22/2020   |
| Project Comment |              |

**CHAIN-OF-CUSTODY**



United Initiators, Inc  
 United Initiators, SPI, Inc.

21-145-0124  
 11985  
 05-25-2021  
 13:54:22

| Company Name<br>United Initiators, Inc             |              | Company Number<br>11985                 |         | Client Project Manager/Contact<br>Mr. Vic Forte   |           |                         | Purchase Order Number  |          |  |
|--|--------------|---|---------|---|-----------|-------------------------|--|----------|--|
| Site Name<br>United Initiators, SPI, Inc.          |              | Project Number                          |         | <input type="checkbox"/> RUSH – Additional charges apply<br><input type="checkbox"/> Special Detection Limits(s)<br>Date Results Needed |           |                         | Method of Shipment<br><input type="checkbox"/> Fed Ex <input type="checkbox"/> UPS <input type="checkbox"/> USPS<br><input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off<br>Other |          |  |
| LIMS Project ID<br>United Initiators - Semi-annual |              | Project Manager Phone #<br>870-572-2935 |         | Project Manager Email<br>vic.forte@united-in.com  |           |                         | Site/Facility ID #   |          |  |
| Date   | Time         | Sample ID                               | Matrix  | Grab/Comp   | # of Cont | Container Type          | Preservation   | Analyses |  |
| 52521  | 1045         | Grab                                    | Aqueous | G   | 3         | Glass Vial Amber - 40ml | HCL - Hydrochloric Acid  | VOC      |  |
| L  | L            | Grab                                    | Aqueous | G   | 1         | Plastic - Pint          | NaOH - Sodium Hydroxide  | CNT      |  |
| 5 <sup>24</sup> 2521                               | 1015<br>1015 | Composite                               | Aqueous | C   | 1         | Plastic - Pint          | HNO3 - Nitric Acid   | Pb/Zn    |  |
| 1  | L            | Composite                               | Aqueous | C   | 2         | Glass Amber - Liter     | Na2S2O3 - Sodium Thiosulfate   | SVOC     |  |

| For Laboratory Use Only |               |              | Sampled by (Name - Print)    |              | Client Remarks/Comments |                          |              |             |
|-------------------------|---------------|--------------|------------------------------|--------------|-------------------------|--------------------------|--------------|-------------|
| Ice                     | Custody Seals | Lab Comments | <i>W Owens</i>               |              |                         |                          |              |             |
| <i>BN</i>               | <i>YN</i>     |              | Relinquished by: (SIGNATURE) | Date         | Time                    | Received by: (SIGNATURE) | Date         | Time        |
|                         |               |              | Relinquished by: (SIGNATURE) | Date         | Time                    | Received by: (SIGNATURE) | Date         | Time        |
| Blank/Cooler Temp       |               |              | Relinquished by: (SIGNATURE) | Date         | Time                    | Received by: (SIGNATURE) | Date         | Time        |
| <i>7-99</i>             | <i>1.1°C</i>  |              | <i>W Owens</i>               | <i>52521</i> | <i>1330</i>             | <i>W Owens</i>           | <i>52521</i> | <i>1330</i> |
| <i>WO</i>               |               |              |                              |              |                         |                          |              |             |

6/18/2021

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

Ref: Analytical Testing  
Lab Report Number: 21-160-0046  
Client Project Description: Process Water

Dear Mr. Jeff Wages:

Waypoint Analytical, LLC. received sample(s) on 6/9/2021 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.

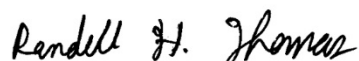
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule August 2017) 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      | 02/28/2022      |
| Arkansas       | State Program         | 88-0650    | 02/07/2022      |
| California     | State Program         | 2904       | 06/30/2021      |
| Florida        | State Program - NELAP | E871157    | 06/30/2021      |
| Georgia        | State Program         | C044       | 02/18/2023      |
| Georgia        | State Program         | 04015      | 06/30/2021      |
| Illinois       | State Program - NELAP | 200078     | 10/10/2021      |
| Kentucky       | State Program         | 80215      | 06/30/2021      |
| Kentucky       | State Program         | KY90047    | 12/31/2021      |
| Louisiana      | State Program - NELAP | LA037      | 12/31/2021      |
| Louisiana      | State Program - NELAP | 04015      | 06/30/2021      |
| Mississippi    | State Program         | MS         | 02/11/2023      |
| North Carolina | State Program         | 415        | 12/31/2021      |
| Oklahoma       | State Program         | 9311       | 08/31/2021      |
| Pennsylvania   | State Program - NELAP | 68-03195   | 05/31/2022      |
| South Carolina | State Program         | 84002      | 06/30/2021      |
| South Carolina | State Program         | 84002      | 06/30/2021      |
| Tennessee      | State Program         | 02027      | 02/11/2023      |
| Tennessee      | A2LA ISO 17025:2017   | 4313.01    | 10/31/2021      |
| Texas          | State Program - NELAP | T104704180 | 09/30/2021      |
| Virginia       | State Program         | 00106      | 06/30/2021      |
| Virginia       | State Program - NELAP | 460181     | 09/14/2021      |



**Sample Summary Table**

**Report Number:** 21-160-0046

**Client Project Description:** Process Water

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| <b>Lab No</b> | <b>Client Sample ID</b> | <b>Matrix</b> | <b>Date Collected</b> | <b>Date Received</b> |
|---------------|-------------------------|---------------|-----------------------|----------------------|
| 94956         | Process Waste Water     | Aqueous       | 06/08/2021 14:00      | 06/09/2021           |

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Client: United Initiators, Inc  
Project: Process Water  
Lab Report Number: 21-160-0046  
Date: 6/18/2021

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**CASE NARRATIVE**

**Metals Digestion Method EPA-200.7 (PREP)**

Sample 94956 (Process Waste Water)

QC Batch No: L558880/L558880

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

11985

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

Project Process Water

Information :

Report Date : 06/18/2021

Received : 06/09/2021

*Randell H. Thomas*

Report Number : **21-160-0046**

**REPORT OF ANALYSIS**

Randy Thomas  
Project Manager

Lab No : **94956**

Matrix: **Aqueous**

Sample ID : **Process Waste Water**

Sampled: **6/8/2021 14:00**

| Test | Results | Units | MLL    | DF | Date / Time Analyzed | By  | Analytical Method |
|------|---------|-------|--------|----|----------------------|-----|-------------------|
| Lead | <0.0600 | mg/L  | 0.0600 | 1  | 06/17/21 22:33       | TJS | EPA-200.7         |
| Zinc | <0.200  | mg/L  | 0.200  | 1  | 06/17/21 22:33       | TJS | EPA-200.7         |

**Qualifiers/  
Definitions**

DF Dilution Factor  
MLL Method Quantitation Limit

L Limit Exceeded

### Shipment Receipt Form

Customer Number: **11985**  
 Customer Name: **United Initiators, Inc**  
 Report Number: **21-160-0046**

#### 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.<br>Samples were considered acceptable as cooling<br>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:         | 155606       |
| Initiated By:   | Randy Thomas |
| Initiated Date: | 3/23/2021    |
| Project Comment |              |

**CHAIN-OF-CUSTODY**

21-160-0046  
 11985  
 06-09-2021  
 16:21:19  
 United Initiators, Inc  
 Process Water

|                             |                         |   |   |
|-----------------------------|-------------------------|---|---|
| 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<br><input type="checkbox"/> Special Detection Limits(s)<br>Date Results Needed | Method of Shipment<br><input type="checkbox"/> Fed Ex <input checked="" type="checkbox"/> UPS <input type="checkbox"/> USPS<br><input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off<br>Other |
| Process Water - Lead & Zinc |                         |   |   |
| LIMS Project ID             | Project Manager Phone # | Project Manager Email   | Site/Facility ID #  |
|                             | 870-572-3297            | jeff.wages@united-in.com  |   |

| Date   | Time    | Sample ID           | Matrix | Grab/Comp | # of Cont | Container Type | Preservation       | Analyses |
|--------|---------|---------------------|--------|-----------|-----------|----------------|--------------------|----------|
| 6/8/21 | 2:00 PM | 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 | Vic Fozie                    |                         |         |                          |         |      |
| <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |              | Relinquished by: (SIGNATURE) | Date                    | Time    | Received by: (SIGNATURE) | Date    | Time |
|                                     |                                     |              |                              | 6/8                     | 2:00 PM |                          |         |      |
|                                     |                                     |              |                              |                         |         |                          |         |      |
| Blank/Cooler Temp                   |                                     |              | Relinquished by: (SIGNATURE) | Date                    | Time    | Received by: (SIGNATURE) | Date    | Time |
| M/A                                 |                                     |              |                              |                         |         |                          | 6/19/21 |      |

*[Handwritten signature]*  
 6/19/21  
 1000