



March 1, 2022

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 30, 2022. 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: August 1, 2021 TO: January 30, 2022

(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 80 (ave during period)

(4) FLOW MEASUREMENT

A. Total Plant Flow to POTW in Gallons per Day

Average: 17,714 gpd

Maximum: 18,842 gpd

FR414 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	16,522	17,574	Batch & Continuous
Unregulated*			
Cooling Water			
Sanitary	1,192	1,268	Continuous

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

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM	B. COMMENTS ON TREATMENT SYSTEM
<p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Neutralization</p> <p><input type="checkbox"/> Chemical Precipitation and Sedimentation</p> <p><input checked="" type="checkbox"/> Biological</p> <p><input type="checkbox"/> Cyanide Destruction</p> <p><input type="checkbox"/> Other _____</p> <p><input type="checkbox"/> None</p>	<p>Two aerated ponds with a total surface area of ~6.5 acres.</p> <p>** Sanitary plus dilution from rain water equals ~0.94.</p>

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		
Effluent characteristics				
Acenaphthene	47	19	<80.0	<80.0
Anthracene	47	19	<80.0	<80.0
Benzene	134	57	14.1	14.1
Bis(2-ethylhexyl) phthalate	258	95	<400	<400
Carbon Tetrachloride	380	142	<10.0	<10.0
Chlorobenzene	380	142	<10.0	<10.0
Chloroethane	295	110	<10.0	<10.0
Chloroform	325	111	<10.0	<10.0
Di-n-butyl phthalate	43	20	<200	<200
1,2-Dichlorobenzene	794	196	<10.0	<10.0
1,3-Dichlorobenzene	380	142	<10.0	<10.0
1,4-Dichlorobenzene	380	142	<10.0	<10.0
1,1-Dichloroethane	59	22	<10.0	<10.0

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1,2-Dichloroethane	574	180	<10.0	<10.0
1,1-Dichloroethylene	60	22	<10.0	<10.0
1,2-trans-Dichloroethylene	66	25	<10.0	<10.0
1,2-Dichloropropane	794	196	<10.0	<10.0
1,3-Dichloropropylene	794	196	<10.0	<10.0
Diethyl phthalate	113	46	<200	<200
Dimethyl phthalate	47	19	<200	<200
4,6-Dinitro-o-cresol	277	78	<400	<400
Ethylbenzene	380	142	<10.0	<10.0
Fluoranthene	54	22	<80.0	<80.0
Fluorene	47	19	<80.0	<80.0
Hexachlorobenzene	794	196	<200	<200
Hexachlorobutadiene	380	142	<200	<200
Hexachloroethane	794	196	<200	<200
Methyl Chloride	295	110	<10.0	<10.0
Methylene Chloride	170	36	<100.0	<100.0
Naphthalene	47	19	<80.0	<80.0
Nitrobenzene	6,402	2,237	<200	<200
2-Nitrophenol	231	65	<200	<200
4-Nitrophenol	576	162	<400	<400
Phenanthrene	47	19	<80.0	<80.0
Pyrene	48	20	<80.0	<80.0
Tetrachloroethylene	164	52	<10.0	<10.0
Toluene	74	28	60.6	60.6
Total Cyanide	1,200	420	12	12
Total Lead	57.6	57.6	<0.5	<0.5
Total Zinc ²	134.4	134.4	<20.0	<20.0
1,2,4-Trichlorobenzene	794	196	<200	<200
1,1,1-Trichloroethane	59	22	<10.0	<10.0
1,1,2-Trichloroethane	127	32	<10.0	<10.0
Trichloroethylene	69	26	<10.0	<10.0
Vinyl Chloride	172	97	<10.0	<10.0

(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 21-350-0157).

The attached analytical Report (21-272-0087) indicates the total Toluene concentration in the sample to be 60.6 µg/L. Our calculated maximum for any monthly average for Toluene is 74 µg/L and the maximum for any one day is 28 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

3/1/2022
DATE SIGNED