

**Gilliam, Allen**

**From:** Gilliam, Allen  
**Sent:** Monday, June 22, 2009 2:11 PM  
**To:** 'bkniswonger@bscn.com'  
**Cc:** Henderson, Katie  
**Subject:** Ind. Metal Finishing (ARP001023) 4-09 Semi Annual Report (Pocahontas AR0046566)

Brian,

Your semi-annual pretreatment report (dated 4/21/09; rec'd 5/1/09) is deemed complete and compliant with the Metal Finishing regulations in 40 CFR 433.17.

You've certified ``Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or pretreatment standard] for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan [TOMP] submitted to the permitting [or ADEQ] authority" per 40 CFR 433.12 in lieu of monitoring for the toxic organic compounds.

This office can find no record of the TOMP. Please submit one for approval. EPA guidance for the development of a TOMP can be found at [http://www.ci.austin.tx.us/water/downloads/wwwssd\\_iw\\_tompguidance.pdf](http://www.ci.austin.tx.us/water/downloads/wwwssd_iw_tompguidance.pdf) with a fairly comprehensive example of one in Appendix D. Yours should not have to be that comprehensive.

A note in your file, dated 11/3/05, written by R.Torrence indicated you were to send a letter "stating that IMF does not have chemicals with toxic organics in them".

If there are further questions, please feel free to contact this office at 501.682.0625.

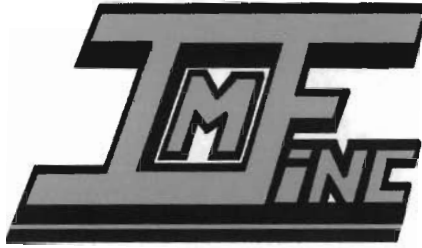
Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator

cc: Katie Henderson ("Pretreatment Reports")

NPDES PERMIT FILE  
 NPDES # AR0046566  
 AFIN # 00-00000  
 \_\_\_\_\_ Permit PN  
 \_\_\_\_\_ Correspondence  
 ✓ \_\_\_\_\_ Technical Backup  
 6/22/09/11/ Date Scanned

Industrial Metal Finishing  
329 Frazier St.  
Industrial Park  
Walnut Ridge AR 72476  
mail received @P.O.Box  
326  
Pocahontas AR 72455



AR P001023  
Phone:(870)886-7531 OR (870)378-1977  
Website: www.indmetalfinishing.com  
Email: bkniswonger@bscn.com  
fax:(870)886-9546

AG

Mr. Gilliam ADEQ NPDES Pretreatment  
5301 North Shore Dr.  
N. Little Rock AR 72118

6856  
MAY - 1 2009  
compliant / complete & will request  
TOMP submit #21  
AF  
MH

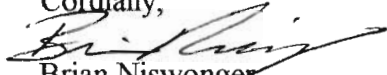
April 21, 2009

Mr. Gilliam,

Enclosed is the semi-annual report for Industrial users regulated by categorical pretreatment standards (40CFR433) in accordance with 40CFR403.12(E). Also, enclosed is the water analysis for the metals from American Enterplex Corporation.

I hope I have sent all the information that has been requested. If not, please contact me at 8708867531.

Cordially,

  
Brian Niswonger  
Production Manager

Enclosures: 1. Semi annual report  
2. Chain of custody  
3. Laboratory report

cc: Mr. Herring Water Superintendent  
216 S W 4<sup>th</sup> St. Walnut Ridge AR 72476  
Mrs. Rogers Mayor of Walnut Ridge  
300 w. Main St. Walnut Ridge AR 72476



Industrial Metal Finishing Inc.  
ATTN: Mr. Brian Niswonger  
Post Office Box 326  
Pocahontas, AR 72455

Dear Mr. Brian Niswonger:

Project Description: One (1) water sample(s) received on April 10, 2009

This report is the analytical results and supporting information for the sample submitted to American Interplex Corporation (AIC) on April 10, 2009. The following results are applicable only to the sample identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the laboratory director or a qualified designee.

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

**AMERICAN INTERPLEX CORPORATION**

By \_\_\_\_\_

A handwritten signature in black ink, appearing to read 'John Overbey', is written over a horizontal line. Below the signature, the name 'John Overbey' and the title 'Laboratory Director' are printed in a standard font.

Enclosure(s): Chain of Custody



Industrial Metal Finishing Inc.  
Post Office Box 326  
Pocahontas, AR 72455

ANALYTICAL RESULTS

AIC No. 128282-1  
Sample Identification: IMF4909M, C 4/9/09 2:50pm

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	SM4500-CN C,E	< 0.01	0.01	mg/l	W28684	
Cadmium	EPA 200.8	< 0.004	0.004	mg/l	S25303	
Chromium	EPA 200.8	0.0079	0.007	mg/l	S25303	
Copper	EPA 200.8	0.035	0.006	mg/l	S25303	
Lead	EPA 200.8	< 0.04	0.04	mg/l	S25303	
Nickel	EPA 200.8	< 0.01	0.01	mg/l	S25303	
Silver	EPA 200.8	< 0.007	0.007	mg/l	S25303	
Zinc	EPA 200.8	0.097	0.002	mg/l	S25303	

**SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433**

Use of this form is not an EPA/ADEQ requirement.

Attn: Water Div/NPDES Pretreatment

**(1) IDENTIFYING INFORMATION**

**A. LEGAL NAME & MAILING ADDRESS**

Industrial Metal Finishing, Inc.  
P.O. Box 326  
Pocahontas, AR 72455

**B. FACILITY & LOCATION ADDRESS**

Industrial Metal Finishing, Inc.  
329 Frazier Street  
Walnut Ridge, AR 72476

**C. FACILITY CONTACT: Brian Niswonger**

**TELEPHONE NUMBER: (870)886-7531**

**e-mail:**

**(2) REPORTING PERIOD--FISCAL YEAR From ??? to ????** (Both Semi-Annual Reports must cover Fiscal Year)

**A. MONTHS WHICH REPORTS ARE DUE**

**April and October**

**B. PERIOD COVERED BY THIS REPORT**

**FROM: Oct. 2008 TO: April 2009**

**(3) DESCRIPTION OF OPERATION**

**A. REGULATED PROCESSES**

**CORE PROCESS(ES)**

CHECK EACH APPLICABLE BLOCK

- Electroplating**
- Electroless Plating**
- Anodizing**
- Coating**
- Chemical Etching and Milling**
- Printed Circuit Board Manufacture**

**ANCILLARY PROCESS(ES)\***

LIST BELOW EACH PROCESS USED IN THE FACILITY

- Black Oxide (ferrous metals)**
  - Zinc Phosphate (ferrous metals)**
  - Zinc Electroplating**
- 
- 
- 

\*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

**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**

5

**D. [Reserved]**

**(A) FLOW MEASUREMENT**

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge
Regulated (Core & Cyanide)	3500	5530	Continuous
Regulated (Cyanide)	0	0	0
§403.6(e) Unregulated	0	0	0
§403.6(e) Dilute	0	0	0
Cooling Water	0	0	0
Sanitary	250	300	Batch
<b>Total Flow to POTW</b>	<b>3750</b>	<b>5830</b>	*****

"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
- Chromium Reduction
- Cyanide Destruction
- Other \_\_\_\_\_
- None

**B. COMMENTS ON TREATMENT SYSTEM**

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF 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 IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

Pollutant(mg/l)	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*
Max for 1 day	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Monthly Ave	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	<0.004	0.0079	0.035	<0.04	<0.01	<0.007	0.097	<0.01	n/a
Ave Measured									

Sample Location      Effluent Sampling Point(Schematic Flow Diagram)

Sample Type (Grab or Composite)     Composite

Number of Samples and Frequency Collected      4; 2 hrs.

40CFR136 Preservation and Analytical Methods Use:  Yes  No

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]

§6602 [42 U.S.C. 13101] Findings and Policy para (b) Policy.—The Congress hereby declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.

The User may list any new or ongoing Pollution Prevention practices:

(8) GENERAL COMMENTS

(9) SIGNATORY REQUIREMENTS [40CFR403.12(l)]

I certify under penalty of law that I have personally examined and am familiar with the information in 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.

**William Niswonger**

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

**Owner**  
OFFICIAL TITLE

4/29/09  
DATE SIGNED

(6) CERTIFICATION

A. [Reserved]

[Reserved]

B. CHECK ONE:  §433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED  §433.12(a) TTO CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last semi-annual compliance report. I further certify that this facility is implementing the toxic organic management plan submitted to Arkansas Department of Environmental Quality.

**Brian Niswonger**  
(Typed Name)

*Brian Niswonger*  
(Corporate Officer or authorized representative)

Date of Signature 4/29/09

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS )  
COUNTY OF Lawrence )

Before me, the undersigned authority, on this day personally appeared Brian Niswonger of Industrial Metal Finishing, a corporation, known to me to be the person whose name is subscribed to the foregoing instrument(s), and acknowledged to me that he executed the same for purposes and considerations therein expressed, in the capacity therein stated and as the act and deed of said corporation.

Given under my hand and seal of office on this 29<sup>th</sup> day of April, 2009.

*Naomi Anne Mullen*  
Notary Public in and for \_\_\_\_\_  
County, Arkansas





