

Peltier, Hannah

From: Gilliam, Allen
Sent: Friday, May 01, 2015 4:01 PM
To: brian niswonger
Cc: Peltier, Hannah; wrcww@att.net
Subject: AR0046566_Industrial Metal Finishing No 1 and No 2 ARP001023 and ARP001024 April 2015 Semi annual Pretreatment report_20150501
Attachments: APRIL 2015 American Interplex Analytical.pdf; CIU_semi annual report_FORM_433 Facility 1 APRIL 2015.doc; CIU_semi annual report_FORM_433 Facility2 April 2015.doc

Brian,

Industrial Metal Finishing facilities' number 1 and 2 April 2015 April 2015 semi-annual Pretreatment reports were electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically compliant with the Metal Finishing standards in 40 CFR 433.17.

No further action is deemed necessary at this time.

Thank you for your timely report.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: John Kopp, Walnut Ridge Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

From: bniswonger@indmetalfinishings.com [<mailto:bniswonger@indmetalfinishings.com>]
Sent: Tuesday, April 28, 2015 3:15 PM
To: Gilliam, Allen
Cc: MAYOR Walnut Ridge; Lester Herring
Subject: Semi annual report

Dear Sirs,

Attached you will find our semi-annual report. Please contact me if you need any additional information.

Thank you and have a great day.

Brian Niswonger

President

Industrial Metal Finishing, Inc.

Tel#(870)886-7531

Cell#(870)378-1977

Fax#(870)886-9546

email bniswonger@indmetalfinishings.com




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

This report contains the analytical results and supporting information for samples submitted on April 17, 2015. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Laboratory Director or a qualified designee.



John Overbey
Laboratory Director

This document has been distributed to the following:

PDF cc: Industrial Metal Finishing Inc.
ATTN: Mr. Brian Niswonger
bniswonger@indmetalfinishings.com



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

SAMPLE INFORMATION

Project Description:

Two (2) water sample(s) received on April 17, 2015
April 2015

Receipt Details:

A Chain of Custody was provided. The samples were delivered in one (1) ice chest.
Ice chest #1 was delivered with shipping documentation.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

<u>Laboratory ID</u>	<u>Client Sample ID</u>	<u>Sampled Date/Time</u>	<u>Notes</u>
189685-1	IMF1 M, C	15-Apr-2015 1558	
189685-2	IMF2 M, C	15-Apr-2015 1540	

Case Narrative:

There were no qualifiers for this data and all samples met quality control criteria.

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).

"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.

"Standard Methods for the Examination of Water and Wastewaters", (SM).

"American Society for Testing and Materials" (ASTM).

"Association of Analytical Chemists" (AOAC).

Industrial Metal Finishing Inc.
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Pocahontas, AR 72455

ANALYTICAL RESULTS

AIC No. 189685-1

Sample Identification: IMF1 M, C 15-Apr-2015 1558

Analyte		Result	RL	Units	Qualifier
Total Cyanide		< 0.01	0.01	mg/l	
SM 4500-CN C,E 1999	Prep: 20-Apr-2015 0843 by 308	Analyzed: 20-Apr-2015 1206 by 308		Batch: W51647	
Cadmium		0.0041	0.004	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1925 by 235		Batch: S38755	
Chromium		< 0.007	0.007	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1925 by 235		Batch: S38755	
Copper		0.017	0.006	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1925 by 235		Batch: S38755	
Lead		< 0.04	0.04	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1925 by 235		Batch: S38755	
Nickel		< 0.01	0.01	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1925 by 235		Batch: S38755	
Silver		< 0.007	0.007	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 20-Apr-2015 1015 by 235		Batch: S38755	
Zinc		0.72	0.002	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1925 by 235		Batch: S38755	

AIC No. 189685-2

Sample Identification: IMF2 M, C 15-Apr-2015 1540

Analyte		Result	RL	Units	Qualifier
Total Cyanide		< 0.01	0.01	mg/l	
SM 4500-CN C,E 1999	Prep: 20-Apr-2015 0843 by 308	Analyzed: 20-Apr-2015 1208 by 308		Batch: W51647	
Cadmium		< 0.004	0.004	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1930 by 235		Batch: S38755	
Chromium		< 0.007	0.007	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1930 by 235		Batch: S38755	
Copper		0.020	0.006	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1930 by 235		Batch: S38755	
Lead		< 0.04	0.04	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1930 by 235		Batch: S38755	
Nickel		< 0.01	0.01	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1930 by 235		Batch: S38755	
Silver		< 0.007	0.007	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 20-Apr-2015 1019 by 235		Batch: S38755	
Zinc		0.25	0.002	mg/l	
EPA 200.7	Prep: 17-Apr-2015 1334 by 315	Analyzed: 17-Apr-2015 1930 by 235		Batch: S38755	

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LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	0.1 mg/l	100	85.0-115			W51647	20Apr15 0844 by 308	20Apr15 1158 by 308		
Cadmium	5 mg/l	99.0	85.0-115			S38755	17Apr15 1334 by 315	17Apr15 1718 by 235		
Chromium	0.5 mg/l	101	85.0-115			S38755	17Apr15 1334 by 315	17Apr15 1718 by 235		
Copper	0.5 mg/l	98.8	85.0-115			S38755	17Apr15 1334 by 315	17Apr15 1718 by 235		
Lead	5 mg/l	99.4	85.0-115			S38755	17Apr15 1334 by 315	17Apr15 1718 by 235		
Nickel	0.5 mg/l	99.4	85.0-115			S38755	17Apr15 1334 by 315	17Apr15 1718 by 235		
Silver	0.1 mg/l	100	85.0-115			S38755	17Apr15 1334 by 315	20Apr15 0959 by 235		
Zinc	0.5 mg/l	101	85.0-115			S38755	17Apr15 1334 by 315	17Apr15 1718 by 235		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	189712-1	0.1 mg/l	105	75.0-125	W51647	20Apr15 0844 by 308	20Apr15 1324 by 308		
	189712-1	0.1 mg/l	98.5	75.0-125	W51647	20Apr15 0844 by 308	20Apr15 1325 by 308		
	Relative Percent Difference:		6.10	20.0	W51647				
Cadmium	189686-1	5 mg/l	94.4	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1722 by 235		
	189686-1	5 mg/l	92.4	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1728 by 235		
	Relative Percent Difference:		2.14	20.0	S38755				
Chromium	189686-1	0.5 mg/l	100	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1722 by 235		
	189686-1	0.5 mg/l	97.4	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1728 by 235		
	Relative Percent Difference:		2.63	20.0	S38755				
Copper	189686-1	0.5 mg/l	96.8	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1722 by 235		
	189686-1	0.5 mg/l	95.2	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1728 by 235		
	Relative Percent Difference:		1.65	20.0	S38755				
Lead	189686-1	5 mg/l	96.6	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1722 by 235		
	189686-1	5 mg/l	94.4	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1728 by 235		
	Relative Percent Difference:		2.30	20.0	S38755				
Nickel	189686-1	0.5 mg/l	92.4	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1722 by 235		
	189686-1	0.5 mg/l	90.4	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1728 by 235		
	Relative Percent Difference:		2.19	20.0	S38755				
Silver	189686-1	0.1 mg/l	100	75.0-125	S38755	17Apr15 1334 by 315	20Apr15 1003 by 235		
	189686-1	0.1 mg/l	98.3	75.0-125	S38755	17Apr15 1334 by 315	20Apr15 1006 by 235		
	Relative Percent Difference:		1.71	20.0	S38755				
Zinc	189686-1	0.5 mg/l	96.1	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1722 by 235		
	189686-1	0.5 mg/l	93.7	75.0-125	S38755	17Apr15 1334 by 315	17Apr15 1728 by 235		
	Relative Percent Difference:		2.50	20.0	S38755				



Industrial Metal Finishing Inc.
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LABORATORY BLANK RESULTS

Analyte	Result	RL	PQL	QC Sample	Preparation Date	Analysis Date	Qual
Total Cyanide	< 0.01 mg/l	0.01	0.01	W51647-1	20Apr15 0844 by 308	20Apr15 1156 by 308	
Cadmium	< 0.004 mg/l	0.004	0.004	S38755-1	17Apr15 1334 by 315	17Apr15 1713 by 235	
Chromium	< 0.007 mg/l	0.007	0.007	S38755-1	17Apr15 1334 by 315	17Apr15 1713 by 235	
Copper	< 0.006 mg/l	0.006	0.006	S38755-1	17Apr15 1334 by 315	17Apr15 1713 by 235	
Lead	< 0.04 mg/l	0.04	0.04	S38755-1	17Apr15 1334 by 315	17Apr15 1713 by 235	
Nickel	< 0.01 mg/l	0.01	0.01	S38755-1	17Apr15 1334 by 315	17Apr15 1713 by 235	
Silver	< 0.007 mg/l	0.007	0.007	S38755-1	17Apr15 1334 by 315	20Apr15 0956 by 235	
Zinc	< 0.002 mg/l	0.002	0.002	S38755-1	17Apr15 1334 by 315	17Apr15 1713 by 235	

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:bniswonger@indmetalfinishings.com

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

A. MONTHS WHICH REPORTS ARE DUE

April & October

B. PERIOD COVERED BY THIS REPORT

FROM: October 2014 TO: April 2015

(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)

Chloride Zinc(ferrous metals)

*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]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Ancillary)	6227	8790	continuous
Regulated (Cyanide)	0	0	
§403.6(e) Unregulated*	0	0	
§403.6(e) Dilute	0	0	
Cooling Water	0	0	
Sanitary	125	200	batch
Total Flow to POTW	6352	8990	*****

*"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	0.0041	<0.007	0.017	<0.04	<0.01	<0.007	0.72	<0.01	n/a
Ave Measured									

Sample Location Effluent Sampling Point *(schematic drawing)*

Sample Type (Grab or Composite) Composite

Number of Samples and Frequency Collected 4; 2 hrs.

40CFR136 Preservation and Analytical Methods Use: x Yes No

(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 04/27/15
(Corporate Officer or authorized representative)

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS)
COUNTY OF _____)

Before me, the undersigned authority, on this day personally appeared _____ of _____, 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 _____ day of _____, 200__.

Notary Public in and for _____
County, Arkansas

My commission expires _____.

(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(1)]

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.

Brian Niswonger



Brian Niswonger

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

President
OFFICIAL TITLE

DATE SIGNED 04/27/15

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433

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

Attn: Water Div/NPDES Pretreatment

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

B. FACILITY & LOCATION ADDRESS

Industrial Metal Finishing, Inc.
105 Beacon Road
Walnut Ridge, AR 72476

C. FACILITY CONTACT: Brian Niswonger TELEPHONE NUMBER: (870)886-7531 e-mail:bniswonger@indmetalfinishings.com

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A. MONTHS WHICH REPORTS ARE DUE

April & October

B. PERIOD COVERED BY THIS REPORT

FROM: October 2014 TO: April 2015

(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

Alkaline Zinc(ferrous metals)

*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

3

D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Ancillary)	1440	2000	continuous
Regulated (Cyanide)	0	0	
§403.6(e) Unregulated*	0	0	
§403.6(e) Dilute	0	0	
Cooling Water	0	0	
Sanitary	75	125	batch
Total Flow to POTW	1515	2125	*****

*"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	<0.007	0.020	<0.04	<0.01	<0.007	0.25	<0.01	n/a
Ave Measured									

Sample Location Effluent Sampling Point *(schematic drawing)*

Sample Type (Grab or Composite) Composite

Number of Samples and Frequency Collected 4; 2 hrs.

40CFR136 Preservation and Analytical Methods Use: Yes No

(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 04/27/15
(Corporate Officer or authorized representative)

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS)
COUNTY OF _____)

Before me, the undersigned authority, on this day personally appeared _____ of _____, 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 _____ day of _____, 200__.

Notary Public in and for _____
County, Arkansas

My commission expires _____.

(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(I)]

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.

Brian Niswonger



Brian Niswonger

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

President
OFFICIAL TITLE

DATE SIGNED 04/27/15