

## Peltier, Hannah

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**From:** Gilliam, Allen  
**Sent:** Friday, October 31, 2014 11:06 AM  
**To:** 'bniswonger@indmetalfinishings.com' (bniswonger@indmetalfinishings.com)  
**Cc:** Fuller, Kim; Peltier, Hannah; Walnut Ridge John Kopp (wrcww@att.net)  
**Subject:** AR0046566\_Industrial Metal Finishing No 2 ARP001024 Oct 2014 semi annual Pretreatment report with ADEQ reply\_20121031  
**Attachments:** October 2014 American Interplex Analytical.pdf; CIU\_semi annual report\_FORM\_433 Facility2 October 2014.doc

Brian,

Industrial Metal Finishing's (IMF) "facility No. 2's" October 2014 semi-annual Pretreatment report was 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.

Note: The chain of custody (C of C) does not appear complete. It appears you took the samples and relinquished it to (unidentifiable signature) on 10/15/14 at 3:17 p.m., but there is no signature from this person "relinquishing" it to the lab on 10/16/14 at 1030 hrs. If the chain of custody is sealed in the shipping container and carried by UPS (as indicated), American Interplex should at least make note when "UPS" relinquished it to them with "date/time". Otherwise, the results of IMF's samples may not be admissible in a court of law.

In the future please note the pH at the time of sampling on the C of C.

Thank you for your timely report remaining in compliance with the Federal Pretreatment Regulations in 40 CFR 403.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: John Kopp, Walnut Ridge Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

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**From:** [bniswonger@indmetalfinishings.com](mailto:bniswonger@indmetalfinishings.com) [<mailto:bniswonger@indmetalfinishings.com>]  
**Sent:** Wednesday, October 29, 2014 12:14 PM  
**To:** Gilliam, Allen  
**Cc:** MAYOR Walnut Ridge; Lester Herring  
**Subject:** Oct 2014 semi annual report

Attached you will find IMF's analytical and report for both facilities.

Thank you.

*Brian Niswonger*

*President*

*Industrial Metal Finishing, Inc.*

*Tel#(870)886-7531*

*Cell#(870)378-1977*

*Fax#(870)886-9546*

*email [bniswonger@indmetalfinishings.com](mailto: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 October 16, 2014. 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.



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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 October 16, 2014  
IMF 10/14

#### 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>
183645-1	IMF 1M, 1C 10-15-14 2:40pm	15-Oct-2014 1440	
183645-2	IMF 2M, 2C 10-15-14 2:35pm	15-Oct-2014 1435	

#### 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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**ANALYTICAL RESULTS**

**AIC No.** 183645-1

**Sample Identification:** IMF 1M, 1C 10-15-14 2:40pm

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
<b>Total Cyanide</b> SM 4500-CN C,E 1999 Prep: 17-Oct-2014 0807 by 308	<b>&lt; 0.01</b> Analyzed: 20-Oct-2014 1032 by 311	0.01	<b>mg/l</b> Batch: W49627	
<b>Cadmium</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>0.0088</b> Analyzed: 17-Oct-2014 1735 by 302	0.004	<b>mg/l</b> Batch: S37576	
<b>Chromium</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>0.015</b> Analyzed: 17-Oct-2014 1735 by 302	0.007	<b>mg/l</b> Batch: S37576	
<b>Copper</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>0.013</b> Analyzed: 17-Oct-2014 1735 by 302	0.006	<b>mg/l</b> Batch: S37576	
<b>Lead</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>&lt; 0.04</b> Analyzed: 17-Oct-2014 1735 by 302	0.04	<b>mg/l</b> Batch: S37576	
<b>Nickel</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>0.044</b> Analyzed: 17-Oct-2014 1735 by 302	0.01	<b>mg/l</b> Batch: S37576	
<b>Silver</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>&lt; 0.007</b> Analyzed: 17-Oct-2014 1735 by 302	0.007	<b>mg/l</b> Batch: S37576	
<b>Zinc</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>0.90</b> Analyzed: 17-Oct-2014 1735 by 302	0.002	<b>mg/l</b> Batch: S37576	

**AIC No.** 183645-2

**Sample Identification:** IMF 2M, 2C 10-15-14 2:35pm

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
<b>Total Cyanide</b> SM 4500-CN C,E 1999 Prep: 17-Oct-2014 0807 by 308	<b>&lt; 0.01</b> Analyzed: 20-Oct-2014 1034 by 311	0.01	<b>mg/l</b> Batch: W49627	
<b>Cadmium</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>0.0069</b> Analyzed: 17-Oct-2014 1739 by 302	0.004	<b>mg/l</b> Batch: S37576	
<b>Chromium</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>0.012</b> Analyzed: 17-Oct-2014 1739 by 302	0.007	<b>mg/l</b> Batch: S37576	
<b>Copper</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>0.012</b> Analyzed: 17-Oct-2014 1739 by 302	0.006	<b>mg/l</b> Batch: S37576	
<b>Lead</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>&lt; 0.04</b> Analyzed: 17-Oct-2014 1739 by 302	0.04	<b>mg/l</b> Batch: S37576	
<b>Nickel</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>0.035</b> Analyzed: 17-Oct-2014 1739 by 302	0.01	<b>mg/l</b> Batch: S37576	
<b>Silver</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>&lt; 0.007</b> Analyzed: 17-Oct-2014 1739 by 302	0.007	<b>mg/l</b> Batch: S37576	
<b>Zinc</b> EPA 200.8 Prep: 16-Oct-2014 1448 by 311	<b>0.69</b> Analyzed: 17-Oct-2014 1739 by 302	0.002	<b>mg/l</b> Batch: S37576	

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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	87.6	85.0-115			W49627	17Oct14 0807 by 308	20Oct14 1025 by 311		
Cadmium	0.05 mg/l	106	85.0-115			S37576	16Oct14 1448 by 311	17Oct14 1710 by 302		
Chromium	0.05 mg/l	98.9	85.0-115			S37576	16Oct14 1448 by 311	17Oct14 1710 by 302		
Copper	0.05 mg/l	103	85.0-115			S37576	16Oct14 1448 by 311	17Oct14 1710 by 302		
Lead	0.05 mg/l	104	85.0-115			S37576	16Oct14 1448 by 311	17Oct14 1710 by 302		
Nickel	0.05 mg/l	103	85.0-115			S37576	16Oct14 1448 by 311	17Oct14 1710 by 302		
Silver	0.02 mg/l	105	85.0-115			S37576	16Oct14 1448 by 311	17Oct14 1710 by 302		
Zinc	0.05 mg/l	111	85.0-115			S37576	16Oct14 1448 by 311	17Oct14 1710 by 302		

**MATRIX SPIKE SAMPLE RESULTS**

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	183659-1	0.1 mg/l	89.0	75.0-125	W49627	17Oct14 0807 by 308	20Oct14 1029 by 311		
	183659-1	0.1 mg/l	85.9	75.0-125	W49627	17Oct14 0807 by 308	20Oct14 1030 by 311		
	Relative Percent Difference:		3.54	20.0	W49627				
Cadmium	183620-2	0.05 mg/l	104	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1715 by 302		
	183620-2	0.05 mg/l	103	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1720 by 302		
	Relative Percent Difference:		1.59	20.0	S37576				
Chromium	183620-2	0.05 mg/l	95.8	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1715 by 302		
	183620-2	0.05 mg/l	93.8	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1720 by 302		
	Relative Percent Difference:		2.04	20.0	S37576				
Copper	183620-2	0.05 mg/l	99.5	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1715 by 302		
	183620-2	0.05 mg/l	97.7	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1720 by 302		
	Relative Percent Difference:		1.67	20.0	S37576				
Lead	183620-2	0.05 mg/l	98.3	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1715 by 302		
	183620-2	0.05 mg/l	96.5	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1720 by 302		
	Relative Percent Difference:		1.79	20.0	S37576				
Nickel	183620-2	0.05 mg/l	100	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1715 by 302		
	183620-2	0.05 mg/l	99.8	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1720 by 302		
	Relative Percent Difference:		0.363	20.0	S37576				
Silver	183620-2	0.02 mg/l	104	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1715 by 302		
	183620-2	0.02 mg/l	102	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1720 by 302		
	Relative Percent Difference:		2.41	20.0	S37576				
Zinc	183620-2	0.05 mg/l	98.0	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1715 by 302		
	183620-2	0.05 mg/l	93.2	75.0-125	S37576	16Oct14 1448 by 311	17Oct14 1720 by 302		
	Relative Percent Difference:		4.49	20.0	S37576				



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**LABORATORY BLANK RESULTS**

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>PQL</u>	<u>QC Sample</u>	<u>Preparation Date</u>	<u>Analysis Date</u>	<u>Qual</u>
Total Cyanide	< 0.01 mg/l	0.01	0.01	W49627-1	17Oct14 0807 by 308	20Oct14 1023 by 311	
Cadmium	< 0.004 mg/l	0.004	0.004	S37576-1	16Oct14 1448 by 311	17Oct14 1705 by 302	
Chromium	< 0.007 mg/l	0.007	0.007	S37576-1	16Oct14 1448 by 311	17Oct14 1705 by 302	
Copper	< 0.006 mg/l	0.006	0.006	S37576-1	16Oct14 1448 by 311	17Oct14 1705 by 302	
Lead	< 0.04 mg/l	0.04	0.04	S37576-1	16Oct14 1448 by 311	17Oct14 1705 by 302	
Nickel	< 0.01 mg/l	0.01	0.01	S37576-1	16Oct14 1448 by 311	17Oct14 1705 by 302	
Silver	< 0.007 mg/l	0.007	0.007	S37576-1	16Oct14 1448 by 311	17Oct14 1705 by 302	
Zinc	< 0.002 mg/l	0.002	0.002	S37576-1	16Oct14 1448 by 311	17Oct14 1705 by 302	





# 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.  
105 Beacon Road  
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: April 2014    TO: October 2014**

## (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)	4820	5100	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
<b>Total Flow to POTW</b>	<b>4895</b>	<b>5225</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	0.0069	0.012	0.012	<0.04	0.035	<0.007	0.69	<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      10/24/14  
(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 10/24/14