Gage, Hannah

From:	Gilliam, Allen
Sent:	Thursday, April 28, 2016 2:25 PM
То:	brian niswonger
Cc:	Gage, Hannah; Leamons, Bryan; Walnut Ridge John Kopp (wrcww@att.net)
Subject:	AR0046566_Industrial Metal Finishing Nos 1 and 2 ARP001023 and ARP001024 April
	2016 semi annual pretreatemnt reports_20160428
Attachments:	APRIL 2016 American Interplex Analytical.pdf; CIU_semi annual report_FORM_433
	Facility 1 APRIL 2016.doc; CIU_semi annual report_FORM_433 Facility2 April 2016.doc

Brian,

Industrial Metal Finishing's two (2) sites' April 2016 semi-annual reports were electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically in compliance with the Federal Metal Finishing standards in 40 CFR 433.17.

There are no further actions deemed necessary at this time.

Thank you for your timely reports.

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: Wednesday, April 27, 2016 10:09 AM
To: Gilliam, Allen
Cc: MAYOR Walnut Ridge; Lester Herring
Subject: semi-annual reports

Dear Mr. Gilliam,

Attached you will find the 2 required semi-annual Pretreatment reports and the American Interplex Analytical. If you need anything additional to these reports, please let me know. Thank you.

Best regards,

Brian Niswonger President Industrial Metal Finishing, Inc. Tel#(870)886-7531 Cell#(870)378-1977 Fax#(870)886-9546 email <u>bniswonger@indmetalfinishings.com</u>



April 26, 2016 Control No. 201463 Page 1 of 5

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 21, 2016. 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 Chief Operating Officer or a qualified designee.

Overbey

Chief Operating Officer

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 samples(s) received on April 21, 2016 April 2016

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:

Laboratory ID	Client Sample ID	Sampled Date/Time	Notes
201463-1	IMF 1	20-Apr-2016 1509	1
201463-2	IMF 2	19-Apr-2016 1615	1

Notes:

1. Received temperature of samples did not meet regulatory requirements

Qualifiers:

D Result is from a secondary dilution factor

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. Post Office Box 326 Pocahontas, AR 72455

ANALYTICAL RESULTS

AIC No. 201463-1

Sample Identification: IMF 1 20-Apr-2016 1509

Analyte		Result	RL	Units	Qualifier
Total Cyanide SM 4500-CN C,E 1999	Prep: 21-Apr-2016 1346 by 319	< 0.01 Analyzed: 21-Apr-2	0.01 2016 1647 by 308	mg/l Batch: W55670	
Zinc EPA 200.7	Prep: 22-Apr-2016 1139 by 317	1.1 Analyzed: 26-Apr-2	0.004 2016 1040 by 317	mg/l Batch: S41022	D Dil: 2
Cadmium EPA 200.8	Prep: 22-Apr-2016 1139 by 317	0.0058 Analyzed: 25-Apr-2	0.004 2016 1905 by 317	mg/l Batch: S41022	
Chromium EPA 200.8	Prep: 22-Apr-2016 1139 by 317	0.027 Analyzed: 25-Apr-2	0.007 2016 1905 by 317	mg/l Batch: S41022	
Copper EPA 200.8	Prep: 22-Apr-2016 1139 by 317	0.018 Analyzed: 25-Apr-2	0.006 2016 1905 by 317	mg/l Batch: S41022	
Lead EPA 200.8	Prep: 22-Apr-2016 1139 by 317	< 0.04 Analyzed: 25-Apr-2	0.04 2016 1905 by 317	mg/l Batch: S41022	
Nickel EPA 200.8	Prep: 22-Apr-2016 1139 by 317	< 0.01 Analyzed: 25-Apr-2	0.01 2016 1905 by 317	mg/l Batch: S41022	
Silver EPA 200.8	Prep: 22-Apr-2016 1139 by 317	< 0.007 Analyzed: 25-Apr-2	0.007 2016 1905 by 317	mg/l Batch: S41022	

AIC No. 201463-2

Sample Identification: IMF 2 19-Apr-2016 1615

Analyte		Result	RL	Units	Qualifier
Total Cyanide SM 4500-CN C,E 1999	Prep: 21-Apr-2016 1346 by 319	< 0.01 Analyzed: 21-Apr-2	0.01 016 1649 by 308	mg/l Batch: W55670	
Zinc EPA 200.7	Prep: 22-Apr-2016 1139 by 317	0.43 Analyzed: 26-Apr-2	0.004 016 1044 by 317	mg/l Batch: S41022	D Dil: 2
Cadmium EPA 200.8	Prep: 22-Apr-2016 1139 by 317	< 0.004 Analyzed: 25-Apr-2	0.004 016 1911 by 317	mg/l Batch: S41022	
Chromium EPA 200.8	Prep: 22-Apr-2016 1139 by 317	0.0092 Analyzed: 25-Apr-2	0.007 016 1911 by 317	mg/l Batch: S41022	
Copper EPA 200.8	Prep: 22-Apr-2016 1139 by 317	0.050 Analyzed: 25-Apr-2	0.006 016 1911 by 317	mg/l Batch: S41022	
Lead EPA 200.8	Prep: 22-Apr-2016 1139 by 317	< 0.04 Analyzed: 25-Apr-2	0.04 016 1911 by 317	mg/l Batch: S41022	
Nickel EPA 200.8	Prep: 22-Apr-2016 1139 by 317	< 0.01 Analyzed: 25-Apr-2	0.01 016 1911 by 317	mg/l Batch: S41022	
Silver EPA 200.8	Prep: 22-Apr-2016 1139 by 317	< 0.007 Analyzed: 25-Apr-2	0.007 2016 1911 by 317	mg/l Batch: S41022	



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

LABORATORY CONTROL SAMPLE RESULTS

	Spike									
Analyte	Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	0.1 mg/l	94.3	85.0-115			W55670	21Apr16 1346 by 319	21Apr16 1639 by 308		
Cadmium	0.05 mg/l	104	85.0-115			S41022	22Apr16 1139 by 317	25Apr16 1751 by 317		
Chromium	0.05 mg/l	101	85.0-115			S41022	22Apr16 1139 by 317	25Apr16 1751 by 317		
Copper	0.05 mg/l	103	85.0-115			S41022	22Apr16 1139 by 317	25Apr16 1751 by 317		
Lead	0.05 mg/l	101	85.0-115			S41022	22Apr16 1139 by 317	25Apr16 1751 by 317		
Nickel	0.05 mg/l	103	85.0-115			S41022	22Apr16 1139 by 317	25Apr16 1751 by 317		
Silver	0.02 mg/l	102	85.0-115			S41022	22Apr16 1139 by 317	25Apr16 1751 by 317		
Zinc	0.05 mg/l	102	85.0-115			S41022	22Apr16 1139 by 317	25Apr16 1751 by 317		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Sample Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	201272-1 0.1 mg/l 201272-1 0.1 mg/l Relative Percent Difference:	90.8 90.3 0.552	75.0-125 75.0-125 20.0	W55670 W55670 W55670	21Apr16 1346 by 319 21Apr16 1346 by 319	21Apr16 1642 by 308 21Apr16 1644 by 308		
Cadmium	201366-1 0.05 mg/l 201366-1 0.05 mg/l Relative Percent Difference:	98.2 98.8 0.573	75.0-125 75.0-125 20.0	S41022 S41022 S41022	22Apr16 1139 by 317 22Apr16 1139 by 317	25Apr16 1757 by 317 25Apr16 1803 by 317		
Chromium	201366-1 0.05 mg/l 201366-1 0.05 mg/l Relative Percent Difference:	96.7 95.4 1.28	75.0-125 75.0-125 20.0	S41022 S41022 S41022	22Apr16 1139 by 317 22Apr16 1139 by 317	25Apr16 1757 by 317 25Apr16 1803 by 317		
Copper	201366-1 0.05 mg/l 201366-1 0.05 mg/l Relative Percent Difference:	94.3 94.5 0.209	75.0-125 75.0-125 20.0	S41022 S41022 S41022	22Apr16 1139 by 317 22Apr16 1139 by 317	25Apr16 1757 by 317 25Apr16 1803 by 317		
Lead	201366-1 0.05 mg/l 201366-1 0.05 mg/l Relative Percent Difference:	95.7 95.4 0.307	75.0-125 75.0-125 20.0	S41022 S41022 S41022	22Apr16 1139 by 317 22Apr16 1139 by 317	25Apr16 1757 by 317 25Apr16 1803 by 317		
Nickel	201366-1 0.05 mg/l 201366-1 0.05 mg/l Relative Percent Difference:	95.2 94.0 1.15	75.0-125 75.0-125 20.0	S41022 S41022 S41022	22Apr16 1139 by 317 22Apr16 1139 by 317	25Apr16 1757 by 317 25Apr16 1803 by 317		
Silver	201366-1 0.02 mg/l 201366-1 0.02 mg/l Relative Percent Difference:	95.0 96.0 1.06	75.0-125 75.0-125 20.0	S41022 S41022 S41022	22Apr16 1139 by 317 22Apr16 1139 by 317	25Apr16 1757 by 317 25Apr16 1803 by 317		
Zinc	201366-1 0.05 mg/l 201366-1 0.05 mg/l Relative Percent Difference:	95.4 95.5 0.0801	75.0-125 75.0-125 20.0	S41022 S41022 S41022	22Apr16 1139 by 317 22Apr16 1139 by 317	25Apr16 1757 by 317 25Apr16 1803 by 317		



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

LABORATORY BLANK RESULTS

				QC			
Analyte	Result	RL	PQL	Sample	Preparation Date	Analysis Date	Qual
Total Cyanide	< 0.01 mg/l	0.01	0.01	W55670-1	21Apr16 1346 by 319	21Apr16 1637 by 308	·
Cadmium	< 0.004 mg/l	0.004	0.004	S41022-1	22Apr16 1139 by 317	25Apr16 1745 by 317	
Chromium	< 0.007 mg/l	0.007	0.007	S41022-1	22Apr16 1139 by 317	25Apr16 1745 by 317	
Copper	< 0.006 mg/l	0.006	0.006	S41022-1	22Apr16 1139 by 317	25Apr16 1745 by 317	
Lead	< 0.04 mg/l	0.04	0.04	S41022-1	22Apr16 1139 by 317	25Apr16 1745 by 317	
Nickel	< 0.01 mg/l	0.01	0.01	S41022-1	22Apr16 1139 by 317	25Apr16 1745 by 317	
Silver	< 0.007 mg/l	0.007	0.007	S41022-1	22Apr16 1139 by 317	25Apr16 1745 by 317	
Zinc	< 0.002 mg/l	0.002	0.002	S41022-1	22Apr16 1139 by 317	25Apr16 1745 by 317	



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CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

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[PO	No.	NC				ANALY	SES R	EQUES	TED				AIC CONTROL NO:
Client:	Industrial .	Metal tini	shi	25			OF	-		r								201463
Projec	t ence: April t ger: Brian N ed								1									AIC PROPOSAL NO:
Refere	ence: April	2010					В											
Projec	t <i>p</i> - , , ,	1			N	<u>IATRIX</u>	_ 0		2		14							Carrier:
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Sampl By:	Brian Nis.	wonser	G R		A T	S O	T L		121	. •	6							Received Temperature C
AIC	Sample	Date/Time	A	M	E R		E		121	1								
<u>No.</u>	Identification	Collected	В	P	R	<u> </u>	S			[Remarks
]	IMFIM	4-20-16		X	X						*							Metals taken from bottle:
1	IMFIC	4-20-16 15:09		X	X			-	+	f								cd, cr, cu, Pb, Ni,
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		Container Type		<u> </u>				<u> </u>	P									on@
		Preservative			<u> </u>				B		$ \mathcal{N} $							Buffer:
	G = Gla						= VO/				H = HC					ium Thio		
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SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433

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Use of this form is	not an EPA/A	DEO requirement.	

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION	
A.LEGAL NAME & MAILING ADDRESS	B. FACILITY & LOCATION ADDRESS
Industrial Metal Finishing, Inc. P.O. Box 326 Pocahontas, AR 72455	Industrial Metal Finishing, Inc. 329 Frazier Street Walnut Ridge, AR 72476
C. FACILITY CONTACT: Brian Niswonger TELEPHONE NUMBER	k: (870)886-7531 e-mail:bniswonger@indmetalfinishings.com
(2) REPORTING PERIODFISCAL YEAR From ??? to ????	
A. MONTHS WHICH REPORTS ARE DUE	B. PERIOD COVERED BY THIS REPORT
April & October	FROM: October 2015 TO: April 2016
(3) DESCRIPTION OF OPERATION	
(3) DESCRIPTION OF OPERATION	
A. REGULATED PROCESSES <u>CORE PROCESS(ES)</u>	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.
CHECK EACH APPLICABLE BLOCK	
X Electroplating X 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	
C. Number of Regular Employees at this Facility 5	D. [Reserved]

40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME:

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core &	5015	7500	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	5140	7700	****

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

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

Neutralization

X 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	0.0058	0.027	0.018	<0.04	<0.01	<0.007	1.1	<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: S433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED S433.12(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 04/27/16 (Corporate Officer or authorized representative)

CORPORATE ACKNOWLEDGEMENT (Optional)

40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: _____

STATE OF ARKANSAS)	
COUNTY OF)	
Before me, the undersigned authority, on this day personally appeared	
a corporation, known to me to be the person whose name is subscribed to the foregoin acknowledged to me that he executed the same for purposes and considerations there 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 sea.]	
§6602 [42 U.S.C. 13101] Findings and Policy para (b) PolicyThe Congress hereby declares it to be the national policy of the United States that pollution whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be p environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be	revented or recycled should be treated in an
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.

Brian Niswonger

Khee

Brian Niswonger NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

President OFFICIAL TITLE

DATE SIGNED 04/27/16

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433

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Use of this form i	s not on	FPA/ADEO	roquiromont	

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION	
A.LEGAL NAME & MAILING ADDRESS Industrial Metal Finishing, Inc. P.O. Box 326	B. FACILITY & LOCATION ADDRESS Industrial Metal Finishing, Inc. 105 Beacon Road
Pocahontas, AR 72455	Walnut Ridge, AR 72476
C. FACILITY CONTACT: Brian Niswonger TELEPHONE NUMBER	R: (870)886-7531 e-mail:bniswonger@indmetalfinishings.com
(2) REPORTING PERIODFISCAL YEAR From ??? to ????	(Both Semi-Annual Reports must cover Fiscal Year)
A. MONTHS WHICH REPORTS ARE DUE	B. PERIOD COVERED BY THIS REPORT
April & October	FROM: October 2015 TO: April 2016
(3) DESCRIPTION OF OPERATION	
A. REGULATED PROCESSES	B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF
CORE PROCESS(ES)	THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.
CHECK EACH APPLICABLE BLOCK	
x 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	
C. Number of Regular Employees at this Facility 3	D. [Reserved]

40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME:

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core &	1232	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	1307	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

X 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	0.0092	0.050	<0.04	<0.01	<0.007	0.43	<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

Image:	A. [R	leserved]
a. CHECK ONE: \$433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED \$ \$433.12(a) TTO CERTIFICATI 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, dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last semi-annua 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 (Typed Name) RATE 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		
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(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 treated in an environmentally safe manner, whenever feasible; pollution that cannot be prevented should be treated in an environmentally safe manner should se 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.

Brian Niswonger

Brian Niswonger

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NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

President OFFICIAL TITLE

DATE SIGNED 04/27/16