Peltier, Hannah

From: Torrence, Rufus
Sent: Wednesday, May 22, 2013 1:41 PM
To: rstrain@reawire.com
Cc: Stowe, Matt; Peltier, Hannah
Subject: AR0021580 AFIN 47-00209 ARP000020 Algonquin Industries Division Compliance Assurance Visit
Attachments: AGQ Insp 20130417.doc; AGQ Lab Report.doc

ADEQ
ARKANSAS
Department of Environmental Quality

May 15, 2013

Ricky Strain, Plant Manager
Algonquin Industries Div
1800 Highway 61 South
Osceola, AR 72370

Re: April 23, 2013 Site Visit for Compliance Assurance: Inspection
(AR0021580, Tracking No. ARP000020, AFIN 47-00209)

Dear Mr. Strain:

Part of ADEQ responsibility to EPA is to ensure that inspections of industries regulated by categorical pretreatment standards (40 CFR Part 405 – 471) are performed on a periodic basis. These industries are referred to as Categorical Industrial Users (CIUs) if they discharge the regulated wastewater into the local Publicly Owned Treatment Works (POTW). In accordance to 40 CFR 403.12(e), these CIUs must submit periodic reports to the Control Authority (ADEQ or Department) and in accordance with 40 CFR 403.8(f)(2)(v) the Control Authority must inspect them at least bi-annually.

Please thank your staff for taking the time to show me around your facility on Tuesday (April 23, 2013). I enjoyed seeing the copper and aluminum wire drawing/extrusion operations again. AGQ makes copper and aluminum wire from 1/2" to 1" diameter rods by drawing or extruding the rods through a series of dies to produce the wire. AGQ uses contact cooling water to cool the wire during the operations. The final wire is used for electrical purposes (conductors, transformers, etc.). AGQ also has several extruders which are capable of infinite array of shapes and diameters. AGQ has three aluminum extruders and one copper extruder. These extruders are referenced in the semi-annual reports by the trade name (Conform 500, 350, 315 & 300).

AGQ must comply with the published standards by calculating "equal" limits for each semi-annual report submitted to ADEQ. Note that "equal" limits are based on the actual production and flows in the previous six month period while most permits contain "equivalent limits" (based on the highest normal production rate over a five year period).

The primary objective of my visit was to verify that the processes have not change significantly since my last visit in March 2011. AGQ currently has ten (10) regulated streams in the Osceola facility.

ADEQ had authorized AGQ to composite similar processes which fall under one subcategory (for example, AGQ has several "conforming" operations; all of which fall under one subcategory C--Extrusion/Pressure Heat Treatment). AGQ was to take one "composite" sample for these operations in lieu taking a single sample for all operations. Presently, AGQ has elected to sample at five (5) locations throughout the plant. Based on my observations, the schematic dated March 31, 2011 appears to be correct with current operations. The Department updated the schematic to show the current status of each operation.

During my recent visit AGQ confirmed the options to haul off-site or discharge to the POTW streams with low flows. Therefore, AGQ must continue to report production rates, flows, allowable limits and actual discharge concentrations to ADEQ for all streams with current or planned discharge to the POTW. AGQ is currently correctly reporting lab concentrations and “allowable limits” to ADEQ as agreed.

AGQ was compositing the samples but not “compositing/combining” the allowable mass of pollutants. In other words, the math model should stimulate that all the similar wastewater (excluding the recirculating water from the pond & die cleaning wastewater) is a “single stream” or “single batch” discharge. The math model should simulate that all three published allowable copper operations mass discharge [§468.14(k), §468.14(m) & §468.14(e)] of each pollutant is in a “single tank” that contains all the wastewater from the previous six months of operation. The model should simulate the same for the Aluminum operations [§467.35 Press Heat wastewater]. AGQ was to compare the composited lab results with the “combined” allowable concentrations. Based on the Department guidance, AGQ is calculating limits correctly and the Department will allow AGQ to continue to calculate these limits for individual processes as “allowable limits”.

If the last semi-annual report (measured concentrations) indicated compliance with all the streams/batches “allowable limits”, AGQ may elect to discharge to the POTW from these operations without additional testing.

AGQ has all the production and flow data on Excel spreadsheets. The main source of cooling water comes from recirculating water that is cooled in a concrete pond; the volume in the recirculating system is approximately 80,000 gallons. In the past AGQ’s plant engineer has been determining “off-pounds” for the regulated operations correctly. Because the plant engineer was not available for this visit, I was not able to make this determination again. Nonetheless, I want to thank Ms. Vivian Avaios (Human Resoures Mgr) for assisting me in the absent of the plant engineer.

During my visit in April 2013, I took a sample of wastewater from the pond recirculating system. ADEQ lab has analyzed this wastewater sample. A copy of the analysis is attached. The ADEQ lab report shows that AGQ is compliant with the limits calculated by the Department for the March 2013 semi-annual report.

During the Pre-Inspection meeting in March 2011, AGQ indicated concern about the proper categorization of the “Solution Heat Treatment” operations. Since AGQ has not changed these operations, the “Solution Heat Treatment” operations will be regulated as shown in Section 5.A (page 5) in AGQ’s (previously referred to as Southwire Specialty Products) Baseline Monitoring Report dated 1-31-97 (available for public inspection on ADEQ website).

During the Exit Interview in March 2011, AGQ confirmed that the Osceola facility did not have a slug plan. Previous inspection report indicated that AGQ had no floor drains in the plant. However, AGQ does have a floor drain in the Die Cleaning room. A berm across the entrance will not prevent spills in the die cleaning room from entering the POTW. AGQ must either permanently plug this drain, install a removable plug or install a stand-pipe.

During the Exit Interview in April 2013, I indicated that AGQ (similar to most industries in the USA) has taken a number of "green" initiatives. By substituting soap-based lubricants for petroleum-based lubricants, AGQ has not only eliminated the source of toxic organics but also eliminated "leaching". Leaching causes the metal concentrations in wastewater to increase significantly. Petroleum-based lubricant tend to be acidic and causes leaching while soap-based lubricants causes no leaching. In conclusion, substituting petroleum-based lubricants for soap-based lubricants not only eliminates the source of toxic organics but also lowers the metal concentrations in wastewater. Consequently, the Department has agreed to allow the O&G alternative limit in lieu of testing for toxic organics as long as AGQ continues to use soap-based lubricants.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us

Sincerely,

Rufus Torrence, Pretreatment Engineer
Water Division

Attachments: ADEQ Lab Report
Algonquin's Inspection Report 20110321

Pretreatment Industrial Inspection

Facility Information

Facility Name: ***Algonquin Industries Division***	Site Address: ***1800 Highway 61 South***
Osceola Plant	***Osceola, AR 72370***
Signatory Authority (Name & Title): ***Ricky Strain, Plant Manager***	
Phone: ***(870) 563-5207***	Mailing Address (if different): ***P O Box 643***
Fax: ***(870) 563-1207***	***Osceola, AR 72370***
Address: ***(same)***	Corporate Owner Name and address (if applicable):
	Rea Magnet Wire
Phone: ***(same)***	***3600 E. Pontiac Fort Wayne, IN 46803***
Fax: ***(same)***	Phone: ***(260) 421-7321***
Contact Person (Name & Title): ***Vivian Avalos,***	Fax:
Human Resource Manager	Corporate CEO: ***Larry Bagwell***
e-mail:	e-mail:
Facility Permit # ***ARP000020*** AFIN **47-00209**	Last Inspection Date: ***March 21, 2011***
POTW (City) IU discharges to: ***City of Osceola***	POTW's NPDES ***#AR0021580***
Industrial Classification: ☒ Categorical	☐ Significant
If Categorical, list which CFR #(s) the facility is subject to: ***40 CFR Parts 467 & 468***	

Table of Contents

Comments : ***The primary objective of this visit is to verify no significant changes in plant operation since last visit.***

Inspector's Name (Print): ***Rufus Torrence***	Signature: 
IU Rep's Name (Print): ***Vivian Avalos***	Signature: ***Not Applicable***
Date and Time Inspection Ended: ***April 23, 2013 @ 2:10 pm***	

I. Summary of Inspection

A. Inspection and Objective (Complete Before Inspection)

☐ Permit Renewal	☒ Bi-Annual	☐ Spill/Slug	☐ Unscheduled
☐ New Construction	☐ Noncompliance	☐ Follow-up	☐ Complaint

Inspection Objective(s) ***Compliance Assurance***

Checklist of items to be reviewed and/or visually inspected:

☒ Pre-inspection Meeting	☐ Permit Conditions	☒ Safety Concerns
☒ Process Inspection	☐ Pretreatment Process	☐ TOMP
☐ Chemical Storage	☒ Discharge point(s)	☐ Spills/Slug Control Plan
☐ Records Review	☐ RCRA information	☒ Process/Flow/Pretreatment Schematics
☒ IU sampling procedures	☐ Flow/pH Meter(s)	☐ Calibration Records
☐ MSDS Inventory List	☐ New MSDS	☒ Pollution Prevention Activities

Comments: ***Algonquin main cooling system recirculates water from an exterior basin. This recirculating system has a volume of approximately 80,000 gallons. The other cooling streams are de minimus, generate only a few gallons per year and this wastewater is hauled off-site (not discharge to POTW). While the recirculating wastewater is always discharged to the POTW, Algonquin wants the option to discharge all streams to the POTW.***

B. Inspection Analysis

Were there any deficiencies/violations identified and noted during the inspection? ☒ Yes ☐ No

Provide a brief narrative of deficiencies/violations or other concerns in the following areas:

Records Review

Process Area(s) : ***Protect POTW from possible spills in the Die Cleaning Room***

Pretreatment System

Self Monitoring Procedures:

Diversion/Sewer Meters

Spill/Slug Control Plan

Sampling Point**:**

Chemical Storage

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: ***April 23, 2013 @ 12:50 pm***	SIC code(s): ***3354, 3355, 3357***	
IU Reps/Titles	Control Authority Reps/Titles	
Ricky Strain, Plant Mgr	***Rufus Torrence, ADEQ Engineer***	
Vivian Avalos, HR Mgr.; Diane Winter, Maint. Supv		
End product(s): ***Non-Ferrous Wire***	Approx. # of units produced: ***N/A***	
Days of Operation: ***M thru F***	Days of Production (if different): ***(same)***	
Hours of Operation: ***24 hrs/day***	Hours of Production (if different): ***(same)***	
Shift 1, hrs.:***7am*** to ***5pm***	Shift 2, hrs.: ***9pm*** to ***7 am***	Shift 3, hrs.: ***5pm*** to ***1 am***
# of Employees: ***91***	Peak Mos.: ***N/A***	"Off" Mos.: ***N/A***

Are there any scheduled plant shutdowns? Yes ☐ No ☒ N/A ☐ If yes, when?

Are there designated plant clean-up days? Yes ☐ No ☒ N/A ☐ If yes, when?

Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes ☒ No ☐

If No, explain:

Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes ☒ No ☐

If Yes, explain: ***Safety Shields***

Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: ☐ Yes. ☒ No

If Yes, explain:

Has there been any changes since the last inspection regarding the following items:

Plant/flow/process layout? Yes ☐ No☐ If yes, obtain copy of updated schematic for facility file.

Processes? Yes ☐ No ☒ If yes, explain:

Production Levels? Yes ☐ No ☒ If yes, explain:

Raw materials? Yes ☐ No ☒ If yes, explain:

Flow rates? Yes ☐ No☒ If yes, explain

Are regulated and non-regulated wastestreams combined?	yes ☐	no ☒	
Prior to Pretreatment System?	yes ☐	no ☐	N/A ☒
If Yes, was the CWF used to calculate limits?	yes ☐	no ☐	N/A ☒
Prior to connection to the POTW sanitary sewer?	yes ☐	no ☒	N/A ☐
At connection to sanitary sewer?	yes ☐	no ☒	N/A ☐
Production and flows verified for Production-Based Standards?	yes ☐	no ☐	N/A ☐

What is the current avg. production rate and process flow?

Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? yes ☐ no ☐

Not Applicable; Algonquin must comply with the published standards.

B. Facility Permits		
Permit Type	Permit No.	Expiration Date
Air	***1333-AR-05***	
RCRA	***ARD0587011604***	
NPDES	***ARR00B069***	
Other		

C. Additional Comments
(Note which section or attachment comments are regarding)
1. Some conform wastewater is hauled off-site; therefore, Algonquin must show "zero-discharge" for these wastestreams (see note 3 below).
2. Contact Cooling Water and Non-Contact cooling water cannot be purposely diverted to a surface discharge. Algonquin may not use "surface discharge" as a contingent plan without first applying for an NPDES Permit.
3. Some conform wastewater is actually a "0.0" discharge (in other words, an intermittent discharge); therefore, Algonquin must continue to report any flow from these conforms to ADEQ.
4. Algonquin has a 40 CFR 463 Plastic Molding and Forming operation to secure plastic coating to some wire.
5. The sludge on the bottom of the concrete pond is periodically hauled away by "Roto Rooter". The pond has a baffle around the pump intake to prevent the sludge from entering the recirculating water. When the pond water is released to the POTW, the level is lowered to the top of the baffle. The remaining water and sludge is hauled off-site by "Roto Rooter" in vaccum trucks.
6. The extruder are manufactured by an English company (BWE) the term "Conform" is a trademark.
7. EPA Al & Cu forming model operations were based on petroleum lubricants which usually have a pH below 7.0. Algonquin is actually using soap-based lubricants which usually have a pH above 7.0. Since the toxic organics in EPA model operations came from the petroleum lubricants and acidic water leaches metal ions from the cu & al wire, historically, Algonquin has no toxic organics and only domestic levels of metals in the wastewater discharged to the POTW because alkaline water does not leach metal ions.

Attachment A: Industrial Process(es)			
List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not			
1. ***Solution Heat Treatment***	Yes ☒ No ☐	4. ***Clean/Etch Bath***	Yes ☒ No ☐
2. ***Core Die Cleaning***	Yes ☒ No ☐	5. ***Clean/Etch Rinse***	Yes ☒ No ☐
3. ***Pressure Heat Treatment CCW***	Yes ☒ No ☐	6. ***Pickling & ExtrusionHeat Trt***	Yes ☒ No ☐
Were processes visually inspected? Yes ☒ No ☐ N/A ☐			
Brief description of process(es):			
Algonquin receives large rolls of Aluminum and Copper rods. These rods are drawn through dies to wire of various diameters.			
General observations of facility's indoor housekeeping: ***Good***			
General observations of area outside facility's building: ***Good***			
Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured (M) or estimated (E). If batch (B) discharged, list frequency and volume (1000 gal/month, e.g.).			
☒ Process Rinse Overflows	☐ Equip. Cleanup	☐ Floor Cleanup	☐ Spent Bath Solutions
☐ Product Cleaning	☐ Forklifts Maint./Wash	☐ Tank Dragout	☐ Air Pollution Devices
☐ Boiler Blowdown	☐ Spent Rinse Tanks	☐ Equipment Coolants	☐ Non-Contact Cooling Water
☐ Stormwater	☐	☐	☐
List Major Raw Materials and Chemicals used:			
Check Waste Stream Pollutants of Concern from Process(es)			
☐ BOD	☒ CN^-	☒Metals (List) ***Cr, Cu, Pb, Ni & Zn***	☐ Solvents (List)
☐ TSS	☐ Cl_2		
☒O&G	☐ S^-		
☐ pH	☐		
Are there floor drains in the Process area? ☐ Yes ☒ No If yes list number and the location of all floor drains:			

Attachment B: Pollution Prevention (P2) / Recycling Activities	
Does the facility have a written P2 Plan? Yes ☐ No ☒	
Does this facility practice P2? Yes ☒ No ☐	
Environmental Management System in place? Yes ☐ No ☒	
ISO Certified? Yes ☒ No ☐ ***ISO 9001 Certified.***	
Written Standard Operating Procedures? Yes ☒ No ☐	
Explain:	
Preventative Maintenance Program Yes ☒ No ☐ (hydraulic systems, valves, pumps, etc)	
Explain:	
Water Reuse: Yes ☒ No ☐	
Explain: ***Water recirculates from processes to external pond.***	
Cost Accounting to Track Savings: Yes ☐ No ☒	
Explain:	
Inventory Control / "Green Purchasing": Yes ☐ No ☒ (lean manufacturing/"env. friendly purchasing", etc)	
Explain:	
Employee Training: Yes ☒ No ☐	
Explain:	
Spent Solvent Reclamation? Yes ☐ No ☒	
Explain:	
Recycle Paper, Aluminum, Boxes, and Pallets? Yes ☒ No ☐	
Explain:	
Recycle Waste Oil, Solvents, and Lubricants? Yes ☒ No ☐	
Explain: ***Recycle used oil***	
Other Activities	
P2 Equipment/Practices in use:	
☐ Overflow Alarms	☒ Aqueous Cleaning Solutions
☐ Fog Spray Rinsing	☐ Countercurrent Rinsing
☐ Dragout Collection Trays	☐ Seal-Less Pumps
☒ Air Jets to Blow Parts Dry	☐ Secondary Containment of Process Solutions
☐ Aqueous Paint Stripping Solutions	☐ Bead Blasting to Remove Paint
☐ Water Soluble Cutting Fluids	☐ Recycle Overspray
☐ In-Process Recycle (Ion Exchange, Reverse Osmosis)	☐ Conductivity Meters
☐ Dead Rinse Tanks	☐ Bath / Rinse Filtration

Attachment C: Pretreatment System

Are wastestreams segregated before pretreatment? ☐ Yes ☐ No ☒ N/A			
Are they pretreated prior to discharge to the sanitary sewer? ☐ Yes ☐ No ☒ N/A			
Was the pretreatment system visually inspected during this visit? ☐ Yes ☐ No ☒ N/A			
Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer: ***Not Applicable***			
☐ Dissolved air floatation	☐ Membrane Tech.	☐ Ion Exchange	☐ Biological Treatment
☐ Centrifugation	☐ Flow Equalization	☐ Ozonation	☐ Chlorinating
☐ Chemical Precipitation	☐ Oil/Water Separation	☐ Reverse Osmosis	☐ Grit Removal
☐ Sludge Filter Press	☐ Grease Trap	☐ Screen	☐ Solvent Separation
☐ pH Adjustment	☐ Sand Trap	☐ Sedimentation	☐ Silver Recovery
☐ Belt/Disk Oil Skimmer	☐	☐	☐
Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):			
Not Applicable			
Does the description match the schematic currently on file? ☐Yes ☐No ☒ N/A			
System Operator(s) Name: ***Not Applicable***			
Does discharge permit require licensed operator? ☐ Yes ☐ No ☒ N/A			
Is the System Operator(s) licensed by the State of Arkansas (per Reg. # 3?) ☐ Yes ☐ No ☒ N/A			
List Name(s) and License classification: ***Not Applicable***			
Is training provided to the Pretreatment System Operator(s)? ☐ Yes ☐ No ☒ N/A			
If Yes, list type and frequency:			
Is the discharge from the Pretreatment System? ☐Batch ☐Continuous ☐ Combination			
If any discharges are batch type or combination, describe the following: ***Not Applicable***			
Volume of each batch: gallons per			
Describe process from which batch originated (spent bath, e.g.): ***Not Applicable***			
Approximate duration of batch discharge:			

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
		Not Applicable

Attachment D: Chemical Storage Area(s)		
Does the facility have a designated chemical storage area(s)? ☐Yes ☒ No		
Was this area(s) visually inspected? ☐Yes ☐No ☒ N/A		
Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1.	☐Yes ☐No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2.	☐Yes ☐No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
3.	☐Yes ☐No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
4.	☐Yes ☐No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
Does the Chemical Storage Area(s) contain any of the following?		
☐ Dikes, Berms for Containment	☐ Plugs for Floor Drains	
☐ Secondary Tanks for Holding	☐ Premix (low) Concentrations	
☐ Alarms	☐ Chain restraints, limited access	
☐ Spills Control Kits for Cleanup	☐ Notification Procedures	
☐ Chemical desegregation within Storage Area	☐ Other	
Chemical Inventory List (MSDS) on file? ☐Yes ☐No ☐N/A		
Were any new MSDS reviewed during the Inspection? ☐Yes ☐No ☐N/A		
If yes, list below:		
Chemical storage comments:		
Chemical handling procedures (totes, dolly, buckets, hardline, etc):		

Attachment E: Spill/Slug Control Plan	
Does the facility have a Spill/Slug control plan?	☐ yes ☒ no[1]
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	☐ yes ☐ no ☐ N/A
(A) Describes discharge practices including non routine batch (slug) discharges	☐ yes ☐ no ☐ N/A
(B) Describes storage and handling of chemicals	☐ yes ☐ no ☐ N/A
(C) Procedures for immediate notification to POTW of slug discharges	☐ yes ☐ no ☐ N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	☐ yes ☐ no ☐ N/A
2. Describes procedures and equipment for emergency response	☐ yes ☐ no ☐ N/A
3. Describes follow-up to limit damage suffered by POTW or environment	☐ yes ☐ no ☐ N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☐ no ☐ N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no ☐ N/A
If no:	
Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☐ no
Is it posted in areas where chemicals are used and stored?	☐ yes ☐ no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no
Have there been any non-routine, episodic discharges or chemical spills in the past year?	☐ yes ☐ no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? ☐ yes ☐ no ☐ N/A	
Visual Inspection of Discharge Lines/Points	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point ***Circulating Pond***	
Total Flow Monitoring Point ***Not Applicable (Batch Discharge)***	
Upstream Manhole	
Point of Connection:	

[1]***No open floor drains to POTW except one located in Die Cleaning Room.***

Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title.

Grab sample from pond return pipe

Where is the sample point located?

☐ End of Process	☐ Pretreatment Effluent	☐ Total Flow
☐ Combined Flow	☐ Metered Flow	☐ Flow Actuator
☐ Private Manhole	☐ Utility Manhole	☐ Advance Notice Required
☐ Safety Hazards Identified	☒ Recirculating System	☐

Is the Sample Collection Site Adequate?	☐ Yes ☐ No ☐ N/A
Does the facility rep. request a split sample on this sampling/inspection?	☐ Yes ☐ No
Does the facility perform self-monitoring tests in-house?	☐ Yes ☒ No ☐ N/A

If no, record the name and address of Contract Lab: ***American Interplex***

Automatic Sampler ☐ or Manual ☐

IU Self-Monitoring Results reviewed:	☐ Yes ☐ No ☐ N/A
Is the Contract Lab certified by ADEQ for test parameters?	☒ Yes ☐ No ☐ N/A
Dates and Times of Sample Analysis Recorded?	☐ Yes ☐ No ☐ N/A
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)	☐ Yes ☐ No ☐ N/A
EPA recommended holding times being met (Refer to 40CFR Part 136)	☐ Yes ☐ No ☐ N/A
Chain of Custody Records for Self-Monitoring Samples Reviewed	☐ Yes ☐ No ☐ N/A
Were correct Sample Types Collected	☐ Yes ☐ No ☐ N/A
Dates and times of Sample Collection Recorded?	☐ Yes ☐ No ☐ N/A
Were Samples preserved correctly (refer to 40CFR Part 136)	☐ Yes ☐ No ☐ N/A
Were Self Monitoring records on file for past 3 years?	☐ Yes ☐ No ☐ N/A

List the parameters the facility monitors and the frequency:

☐ Cd(t)	☒ Cu(t)	☒ Cr(t)	☒ Ni(t)	☒ Pb(t)
☐ Ag(t)	☒ Zn(t)	☐ pH	☐ CN^-(t)	☐ CN^-(a-c)
☐ TTO-Vol	☐ TTO-B/N	☐ TTO-A.E.	☐ TTO-Pest	☐ Cr(hex)
☐	☐	☐	☐	☐

Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433

How does the IU report TTO? ☒ O&G Analysis ☐ Certification Statement

Does the facility have a Toxic Organic Management Plan? ☐ Yes ☐ No ☒ N/A

If yes, Does the plan show how toxic organics are used, stored, and disposed? ☐ Yes ☐ No ☐ N/A

List the date of the last revision to the TOMP:

Is the TOMP being followed as written? ☐ Yes ☐ No ☐ N/A (If no, provide explanation in comments.)

If no, is there evidence that a TOMP is needed? ☐ Yes ☐ No ☐ N/A (If yes, provide description of evidence in comments.)

Comments: ***Even though Algonquin does not have O&G treatment, Algonquin may continue to sample for O&G in lieu of testing for the toxic organics [Ref: 40 CFR 467.03(b) , 40 CFR 468.03(b) & Dev Doc Al Forming Pt Source (440184073B, page 1175)/Dev Doc Cu Forming Pt Source (440184074, page 494). Nonetheless, O&G treatment is not necessary because none of the chemicals in the facility have regulated Toxic Organics.***

5301 Northshore Drive
North Little Rock, AR 72118
Telephone: 501-682-0744

Client Report For: Algonquin Ind. Div 2013 1373
Attention:
Client Address:
,

Report Date: May 16, 2013
LAB ID: AR13APR24-08
Comment:

Approved By:_____ Date:May 16, 2013

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Liitle Rock, AR 72118

Laboratory Contact: Jeff Ruehr
Ruehr@adeq.state.ar.us
501-682-0955

Client:	Special Samples	**Client Sample ID:**	AGQ
Lab ID:	2013-1373	**Collection Date:**	4/23/2013 1:37:00 PM
		Matrix:	Water

Analyses

Total Metals by EPA 200.8 ***EPA 200.8*** ***Batch: 13051310*** ***Run: 1***

	Result	Reporting Limit	MDL	Qual	Unit
Aluminum	<200	200	20		ug/L
Antimony	<100	100	5		ug/L
Arsenic	<10	10	0.5		ug/L
Barium	<100	100	2.0		ug/L
Beryllium	<5	5	0.1		ug/L
Boron	<250	250	5.0		ug/L
Cadmium	<10	10	0.3		ug/L
Calcium	13.2	0.4	0.04		mg/L
Chromium	<10	10	0.3		ug/L
Cobalt	<10	10	0.5		ug/L
Copper	201	10	0.5		ug/L
Iron	268	200	10.0		ug/L
Lead	<10	10	0.1		ug/L
Magnesium	3.31	1	0.1		mg/L
Manganese	41.3	10	0.2		ug/L
Nickel	<25	25	0.5		ug/L
Potassium	<10	10	0.05		mg/L
Selenium	<20	20	0.5		ug/L
Silver	<50	50	1.0		ug/L
Sodium	76.7	0.4	0.02		mg/L
Thallium	<25	25	0.05		ug/L
Vanadium	<25	25	1.0		ug/L
Zinc	<30	30	2.0		ug/L
Dilution Factor	10				
Analyzed By	Robert Graddy				
Analysis Date/Time	May 9 2013 10:01PM				
Prep By					
Prep Date/Time					

Arkansas Department of Environmental Quality
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Analytical Quality Control Results Report

Batch: 13051310	ICP Metals - water (total)
AGQ	LIMS ID: 2013-1373

ICP Metals - water (Total) DUP — Run: 1

Parameter	Result	DL	RL	Accuracy Control	Precision Control
Manganese (RPD)	20 %				0 - 20
Nickel (RPD)	18 %				0 - 20
Nickel	<25 ug/L	5	25		
Potassium	<10 mg/L	0.5	10		
Potassium (RPD)	3.0 %				0 - 20
Selenium (RPD)	257 %				0 - 20
Selenium	<20 ug/L	5	20		
Silver	<50 ug/L	10	50		
Silver (RPD)	0 %				0 - 20
Sodium (RPD)	2.4 %				0 - 20
Sodium	78.6 mg/L	0.2	0.4		
Thallium	<25 ug/L	0.5	25		
Thallium (RPD)	0 %				0 - 20
Vanadium (RPD)	0 %				0 - 20
Vanadium	<25 ug/L	10	25		
Zinc	<30 ug/L	20	30		
Zinc (RPD)	56.8 %				0 - 20
Dilution Factor	10				
Analyzed By	Robert Graddy				
Analysis Date/Time	May 9 2013 10:08PM				
Aluminum	<200 ug/L	200	200		
Aluminum (RPD)	5.1 %				0 - 20
Antimony (RPD)	0 %				0 - 20
Antimony	<100 ug/L	50	100		
Arsenic	<10 ug/L	5	10		
Arsenic (RPD)	19.4 %				0 - 20
Barium (RPD)	0.6 %				0 - 20
Barium	<100 ug/L	20	100		
Beryllium	<5 ug/L	1	5		
Beryllium (RPD)	0 %				0 - 20

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Boron (RPD)	4.9 %				0 - 20
Boron	<250 ug/L	50	250		
Cadmium (RPD)	0 %				0 - 20
Cadmium	<10 ug/L	3	10		
Calcium	13.7 mg/L	0.4	0.4		
Calcium (RPD)	3.6 %				0 - 20
Chromium (RPD)	78.5 %				0 - 20
Chromium	<10 ug/L	3	10		
Cobalt	<10 ug/L	5	10		
Cobalt (RPD)	0 %				0 - 20
Copper (RPD)	7.4 %				0 - 20
Copper	186 ug/L	5	10		
Iron	238 ug/L	100	200		
Iron (RPD)	11.5 %				0 - 20
Lead (RPD)	3.0 %				0 - 20
Lead	<10 ug/L	1	10		
Magnesium	3.36 mg/L	1	1		
Magnesium (RPD)	1.5 %				0 - 20
Manganese	34 ug/L	2	10		