

From: [Gilliam, Allen](#)
To: [Crews, Joe \(jcrews@reawire.com\)](mailto:jcrews@reawire.com)
Cc: [Burrow, Kealey; jrausch@reawire.com](mailto:jrausch@reawire.com); bhaynes58@yahoo.com
Subject: AR0021580_REA Wire ARP000020 Sept 2015 semi annual pretreatment no discharge report clarification comments and submittal requirements_201501001
Date: Thursday, October 01, 2015 3:06:09 PM
Attachments: [Wastewater.pdf](#)
[Flow Schematic with Sample IDs.pdf](#)
[201509 Limits for ADEQ \(2\).xls](#)

Thanks Joe,

Find this office's comments below in red.

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

Ec: Brandon Haynes, Osceola Water and Wastewater Superintendent

E/NPDES/NPDES/Pretreatment/Reports

From: Crews, Joe [mailto:jcrews@reawire.com]
Sent: Friday, September 25, 2015 11:29 AM
To: Gilliam, Allen; Rausch, John
Cc: Burrow, Kealey; bhaynes58@yahoo.com
Subject: RE: AR0021580_REA Wire ARP000020 Sept 2015 semi annual pretreatment report compliance indeterminate_20150923

Allen,

Please see attachments and response below. I hope this helps clear up all questions. I will call you today and make sure everything is good.

That is correct; there were no discharges of federally regulated wastewater to the City's sewage collection system. Thank you for the attached "No Discharge" certification statement.

Page 2, under the column "Batch Discharge Volume", some regulated wastewater was discharged back in 7/1/11 while the rest was "shipped off-site". This is confusing when the last column reads either, "Batch discharge from recirculating pond", "Batch discharge to POTW or waste oil tank", "Batch discharge from Copper Extrusion Product Cooling Tank" or "Batch discharge from Aluminum Extrusion Cooling Water Tank". Please reword 5th column cells to correlate with column 4. "...to either POTW or waste oil tank." or "Batch discharge from Cu Extrusion (C-285) Product Cooling Water Tank", etc aren't self-explanatory. For this semi-annual report, would the "Type of Discharge" column most accurately have read "Zero Discharge"?

These two columns need to correlate with each other.

Sorry for the confusion. There was no discharges to the POTW during this reporting period.

Regulated wastewater was shipped offsite in March 2015.

This Federal regulations in 40 CFR 403.12(b) require REA to illustrate the sampling point(s) in a wastewater flow schematic. The one this office has on file and the one included in REA's semi-annual report does not indicate exactly where any samples were taken. "Sample IDs" on the certified lab's reports refer to combination of numbers and letters. These should be marked on the schematic's sampling points accordingly.

Sample IDs have been added to the schematic (see attached). Thank you. Note that, for the C285 line, one sample was taken, despite the three sampling point arrows. The sample included wastewater from heat treatment, pickling bath, and pickling rinse (hence the three arrows) because the wastewater is combined and recirculated. This is not apparent from schematic. If these 3 lines are actually connected via some form of a manifold, revise schematic accordingly and show the flowline to "recirculation" which is not depicted.

Please revise entire w.w. flow schematic. Remove any reference/w.w. flowlines related to non-existent 40 CFR 463 (Plastic Molding and Forming) processes.

This office is confused regarding the REA's subprocesses shown "Not Present". If these subprocesses are to never be in operation (or are they occasionally?) wouldn't it be make for a "cleaner" w.w. flow schematic to completely eliminate those and just show the various subprocesses (die cleaning, Cu forming pickling Bath/Rinse, e.g.) that are actually in use?

And if there was no discharge of regulated wastewater, why was there any sampling required?

Sampling and reporting was performed to confirm compliance with the discharge permit. If no regulated wastewater was discharged to Osceola's sewage collection system over the last 6 month period prior to REA's semi-annual report due date, a no discharge certification statement is all that is required.

This office can see the purpose of the spreadsheets built by Mr. Torrence or EnSafe, but it will take more time for me to fully understand if their final limitations are correct. REA's "on/off again" subprocesses make REA's Federal limitations most difficult to arrive at. The next time REA discharges to Osceola's sewage collection system, please provide EnSafe's production based converted to concentration based limits basis (spreadsheets).

Please electronically attach in an email to this office what permit/document you have that requires sampling/analysis of wastewater hauled off-site. **If Algonquin's long-term plans include permanently shipping wastewater off-site for disposal, rather than discharging to the POTW, ADEQ and the City of Osceola will be notified prior to implementing this change.**

Per 40 CFR 403.12(b) *Description of operations*. The User shall submit a brief description of the nature, average rate of production, and Standard Industrial Classification of the operation(s) carried out by such Industrial User. This description should include a schematic process diagram which indicates points of Discharge to the POTW from the regulated processes." Submit a detailed process

of your process operations as there is not one on file that I can find.

A good description went into Southern Steel Products' (now REA?) air permit at: <https://www.adeg.state.ar.us/downloads/WebDatabases/PermitsOnline/Air/1333-AR-5.pdf>. REA should be able to put the same effort into what's required under the Federal Pretreatment regulations regarding its sources of wastewater. This, coupled with an updated schematic should help any interested party to understand where the wastewater's generated and flows to the final sampling point to the City.

Submit this document and an updated wastewater flow schematic within 30 days of the date on this correspondence.

This office also needs to see Ensafe's spreadsheets showing step-by-step the calculations from production based to concentration based limits when REA is discharging to the City's sewage collection system.

The allowable concentration limits calculations are attached.

At this point in time, this office cannot assess REA's compliance with the Federal standards in 40 CFRs 467 and 468 and will label REA's compliance as indeterminate until more information is obtained or there is a certification statement from REA that no process wastewater has been discharged to the City's sewage collection system over the last six (6) months during the semi-annual reporting period.

A certification that Algonquin did not discharge process wastewater to the City's sewage collection system during the current monitoring period (March 1, 2015 – August 31, 2015) is attached.

Future phone conversations regarding the reporting format and identification of the sampling points needs to be made in the near future.

Agree. EnSafe and Algonquin are happy to participate in a call with ADEQ regarding future reporting format and sampling identification.

Joseph Crews
Human Resources/Safety Manager
Rea Magnet Wire Company
1800 S US Highway 61
Osceola, AR 72370
870-622-4404
jcrews@reawire.com

September 23, 2015

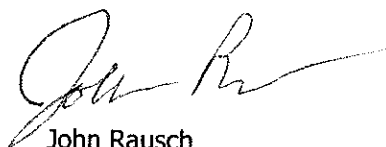
Mr. Allen Gilliam
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

**Re: Wastewater No Discharge Certification
Rea Magnet Wire Company, Inc. — Algonquin Industries Division
Osceola, Arkansas Plant**

Dear Mr. Gilliam:

No process wastewater has been discharged to the City's sewage collection system over the last six (6) months during the March 1, 2015 to August 31, 2015 semi-annual reporting period.

I certify under penalty of law that I have personally examined and am familiar with the information in this letter, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



John Rausch
*Plant Manager, Osceola Plant
Rea Magnet Wire Company, Inc.*

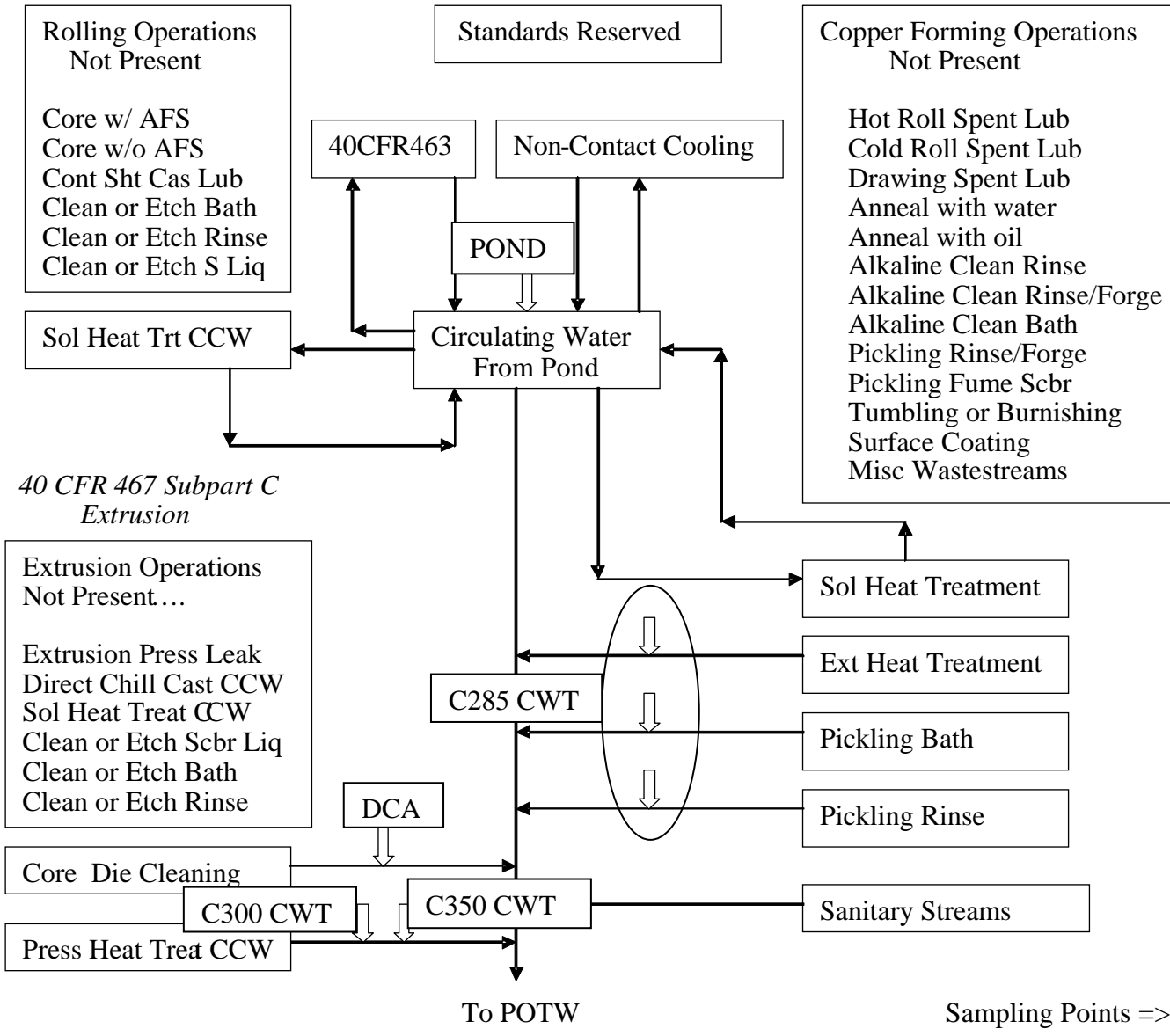
cc: James Carlock, Superintendent
Osceola Water Department
PO Box 443
Osceola, Arkansas 72370

Algonquin Industries Osceola, Arkansas March 2011

40 CFR 467 Subpart A Operations
Rolling with Neat Oils

40CFR463 Subpart A
Contact Cooling

40 CFR 468 Subpart A Operations
Copper Forming



§403.6(e) Nonregulated Streams
Not Present

§403.6(d) Dilution is not applicable
to facilities with only prodbased
streams.

If a stream is not present, show NOT PRESENT or N/P. If a stream is present, the wastewater can enter the POTW but currently has no flow, show 0.0 gpd. If a stream is present but the wastewater cannot enter the POTW, show Zero Discharge or Z/D. If an unregulated stream is present but the User has decided not to declare it at this time, show N/P.

Signature of §403.12(b) Professional

Date

I certify under penalty of law that I have personally examined and am familiar with the information in this document and that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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.

Plant Manager or the authorized §403.12(l) official

Date
AGQ Diagram (March 21, 2011)

Input Values For Determining Effluent Guideline Limits for REA /Algonquin Industries Division for Aluminum Die Cleaning Wastestream

To calculate concentrations:	
Die Cleaning Flow Rate, gpm	20
To calculate cumulative limit:	
Beginning date of period of semiannual report	2/28/2015
End date of period of semiannual report	8/31/2015
Date Sample taken:	8/12/2015
Days from beginning of semi annual report through sample date	165

Summary of Calculated Equivalent Concentration Limits for Caustic Soda Rinse of Extrusion Die Discharge, mg/L		
Parameter	Daily Maximum	Monthly Average
Chromium	12	4.8
Cyanide	8	3.1
Zinc	39	16.5
TTOal *	NA	NA
Oil and Grease	1417	692.5

* Oil and Grease limitations are to be used in place of TTO limitations

extruded aluminum off lb = production + 10% scrap =		110%		
production x				
2015	Extruded Aluminum (All lines) Production			
	Operational days	Aluminum Produced (lbs)	Aluminum passed through (prorated for month) (off lbs)	Calculated Daily Production (off-lb/day)
Mar-15	31	365,492	402,041	12,969
Apr-15	30	365,492	402,041	13,401
May-15	31	365,492	402,041	12,969
Jun-15	30	365,492	402,041	13,401
Jul-15	31	365,492	402,041	12,969
Aug-15	12	365,492	155,629	12,969
Sep-15	NA	0	NA	NA
Oct-15	NA	0	NA	NA
Nov-15	NA	0	NA	NA
Dec-15	NA	0	NA	NA
Jan-16	NA	0	NA	NA
Feb-16	NA	0	NA	NA
Totals	165	2,192,953	2,165,836	13,126