

From: [Gilliam, Allen](#)
To: [Crews, Joe \(jcrews@reawire.com\)](mailto:jcrews@reawire.com); rausch.john@reawire.com
Cc: [Burrow, Kealey](#); [Osceola Brandon Haynes](#)
Subject: AR0021580_REA Wire ARP000020 Sept 2015 semi annual pretreatment no discharge report with further clarification comments and updated ww flow schematic_201501020
Date: Tuesday, October 20, 2015 12:13:20 PM
Attachments: [201509 POTW DMR updated100215.doc](#)
[Wastewater.pdf](#)

Joe,

Per the phone conversation between you, Don Smith and this office today, it is now understood you had zero discharge of Federally regulated wastewater into the City of Osceola sewage collection system. John Rausch, REQ's Plant Manager, has certified to this affect in the second attachment.

Also according to our phone conversations, some of the operations shown on the MS Word attached schematic may not be in use any more, may not even be on-site or not titled correctly. Please submit a final valid and accurate wastewater flow schematic after thorough research with Mr. Smith.

If the Cu line's "Sol Heat Treatment" process is "tagged out" and is expected to be removed, please make a short footnote in its "box" stating something to that effect.

If there's no Cu "Ext Heat Treatment", the box showing this needs to be eliminated; and so and so forth.

If REA is at a point it does not have the need to discharge regulated wastewater to Osceola, please notify this office certifying all process wastewater flowlines have been welded shut ("capped-off") and this office will close REA's Pretreatment file.

If there are further questions please feel free to contact this office.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

Ec: Brandon Haynes, Osceola Water and Wastewater Superintendent

E/NPDES/NPDES/Pretreatment/Reports

SEMI-ANNUAL REPORT FOR USERS REGULATED BY THE Al & Cu FORMING CATEGORIES

ATTN: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION																												
<p>A. LEGAL NAME & MAILING ADDRESS</p> <p align="center">Rea – Algonquin Industries Division 1800 Highway 61 South Osceola, AR 72370</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p align="center">Rea – Algonquin Industries Division 1800 Highway 61 South Osceola, AR 72370</p>																											
<p>C. FACILITY CONTACT: John Rausch (jrausch@reawire.com) TELEPHONE NUMBER: 870-622-4413</p>																												
(2) REPORTING PERIOD--FISCAL YEAR																												
<p align="center">2015 (Both Semi-Annual Reports to Cover Fiscal Year)</p>																												
<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p align="center">September & March</p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p align="center">FROM: March 1, 2015 – August 31, 2015</p>																											
(3) DESCRIPTION OF OPERATION																												
<p>A. Regulated Processes per 40 CFR Part 467 (Aluminum) Subpart A & C and 40 CFR Part 468 (Copper) Subpart A</p> <table border="1" style="width:100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="text-align: left;">PROCESS</th> <th style="text-align: center;">PRODUCTION-OFF/LB</th> <th style="text-align: center;">PRODUCTION DAYS</th> </tr> </thead> <tbody> <tr> <td>Rolled Aluminum (§467.15 Solution Heat Treatment)</td> <td align="center">28,200</td> <td align="center">3/1/2015-8/31/2015 184 days</td> </tr> <tr> <td>Extruded Aluminum (§467.35 Core Die Cleaning)</td> <td align="center">2,192,953</td> <td align="center">3/1/2015-8/31/2015 184 days</td> </tr> <tr> <td>Extruded Aluminum (§467.35 Press Heat Treatment) C300</td> <td align="center">0</td> <td align="center">N/A 0 days</td> </tr> <tr> <td>(§467.35 Press Heat Treatment) C350</td> <td align="center">0</td> <td align="center">N/A 0 days</td> </tr> <tr> <td>Rolled Copper (§468.14(d) Solution Heat Treatment)</td> <td align="center">0</td> <td align="center">N/A 0 days</td> </tr> <tr> <td>Extruded Copper (§468.14(k) Pickling Rinse) C285</td> <td align="center">4,533,773</td> <td align="center">3/1/2015-8/31/2015 184 days</td> </tr> <tr> <td>(§468.14(m) Pickling Bath) C285</td> <td align="center">4,533,773</td> <td align="center">3/1/2015-8/31/2015 184 days</td> </tr> <tr> <td>(§468.14(e) Extrusion Heat Treatment) C285</td> <td align="center">4,533,773</td> <td align="center">3/1/2015-8/31/2015 184 days</td> </tr> </tbody> </table>	PROCESS	PRODUCTION-OFF/LB	PRODUCTION DAYS	Rolled Aluminum (§467.15 Solution Heat Treatment)	28,200	3/1/2015-8/31/2015 184 days	Extruded Aluminum (§467.35 Core Die Cleaning)	2,192,953	3/1/2015-8/31/2015 184 days	Extruded Aluminum (§467.35 Press Heat Treatment) C300	0	N/A 0 days	(§467.35 Press Heat Treatment) C350	0	N/A 0 days	Rolled Copper (§468.14(d) Solution Heat Treatment)	0	N/A 0 days	Extruded Copper (§468.14(k) Pickling Rinse) C285	4,533,773	3/1/2015-8/31/2015 184 days	(§468.14(m) Pickling Bath) C285	4,533,773	3/1/2015-8/31/2015 184 days	(§468.14(e) Extrusion Heat Treatment) C285	4,533,773	3/1/2015-8/31/2015 184 days	<p>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.</p>
PROCESS	PRODUCTION-OFF/LB	PRODUCTION DAYS																										
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<p>C. Number of Regular Employees at this Facility: <u>42</u></p>	<p>D. [Reserved]</p>																											

(4) FLOW MEASUREMENT

B. INDIVIDUAL PROCESS WASTESTREAMS DISCHARGED TO POTW

Operation	Average Flow Rate (gpd)	Number of Discharge Days	Batch Discharge Volume	Type of Discharge
Process:				
§467.15 Solution Heat Treatment ¹ (Aluminum Rolling)	NA	184	N/A	Zero discharge during this monitoring period
§467.35 Cleaning or Etching Rinse (Aluminum Extrusion)	NA	NA	Not in service	NA
§467.35 Cleaning or Etching Bath (Aluminum Extrusion)	NA	NA	Not in service	NA
§468.14(m) Pickling Bath (Copper Extrusion)	13.43	184	2,471 gallons shipped offsite March 23, 2015	Zero discharge during this monitoring period
§468.14(k) Pickling Rinse (Copper Extrusion)	13.43	184	2,471 gallons shipped offsite March 23, 2015	Zero discharge during this monitoring period
§468.14(e) Extrusion Heat Treatment (Copper Extrusion)	13.43	184	2,471 gallons shipped offsite March 23, 2015	Zero discharge during this monitoring period
§467.35 Core-Die Cleaner (Aluminum Extrusion)	20	N/A	N/A	Zero discharge during this monitoring period
§467.35 Press Heat Treatment (Aluminum Extrusion)	13.43	184	2,471 gallons shipped offsite March 23, 2015	Zero discharge during this monitoring period
§468.14(d) Solution Heat Treatment ¹ (Copper Forming [Rolling])	NA	184	N/A	Zero discharge during this monitoring period
§403.6(e) Unregulated:				
Air compressor condensate blowdown	10 (estimate)	144	N/A	Intermittent
Steam clean forklift wash area	5 (estimate)	144	N/A	Intermittent
§403.6(e) Dilute:				
Cooling water ¹	NA	NA	26,667 gallons discharged to the POTW July 1, 2011 (most recent discharge)	Batch discharge from recirculation pond
Sanitary	6,000 (estimate)	144	N/A	Continuous

¹The 80,000 gallon batch discharge is comprised of several regulated and diluted source waters.

(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

SEMI-ANNUAL REPORT

FACILITY NAME: Algonquin Industries

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS ON 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.

Concentrations (mg/l)	Cr		Cu	Pb	Ni	Zn	TTO	O&G		CN		
C-500 Cooling Water Tank (Aluminum Extrusion) Allowable Concentrations	NA		NA	NA	NA	NA	NA	NA		NA		
C-500 Cooling Water Tank Measured Concentrations	NA		NA	NA	NA	NA	NA	NA		NA		
C-300 Cooling Water Tank (Aluminum Extrusion) Allowable Concentrations	0		NA	NA	NA	0	NA	0		0		
C-300 Cooling Water Tank Measured Concentrations	<0.01		NA	NA	NA	<0.05	NA	<5.05		<0.005		
Die Cleaning Allowable Concentrations ¹	12	4.8	NA	NA	NA	39	16.5	NA	1417	693	8	3.1
Die Cleaning Measured Concentrations	0.55		NA	NA	NA	0.735	NA	87.8		<0.005		
Pond Allowable Concentration	2.098		9.086	1.167	11.533	6.864	NA	175.8		0.315		
Pond Measured Concentration	<0.01		0.0129	<0.005	<0.01	<0.05	NA	<5.62		0.0103		
C-350 Aluminum Extrusion Tank 1 (Cleaning or Etching Bath)	NA		NA	NA	NA	NA	NA	NA		NA		
C-350 Aluminum Extrusion Tank 1 Measured Concentration	NA		NA	NA	NA	NA	NA	NA		NA		
C-350 Aluminum Extrusion Tank 2 (Cleaning or Etching Rinse)	NA		NA	NA	NA	NA	NA	NA		NA		
C-350 Aluminum Extrusion Tank 2 Measured Concentration	NA		NA	NA	NA	NA	NA	NA		NA		
C-350 Aluminum Extrusion Tank 3 (Cleaning or Etching Rinse)	NA		NA	NA	NA	NA	NA	NA		NA		
C-350 Aluminum Extrusion Tank 3 Measured Concentration	NA		NA	NA	NA	NA	NA	NA		NA		
C-350 Aluminum Extrusion Tank 4 (Cleaning or Etching Bath)	NA		NA	NA	NA	NA	NA	NA		NA		
C-350 Aluminum Extrusion Tank 4 Measured Concentration	NA		NA	NA	NA	NA	NA	NA		NA		
C-350 Cooling Water Tank (Aluminum Extrusion) Allowable Concentrations	0		NA	NA	NA	0	NA	0		0		
C-350 Cooling Water Tank Measured Concentrations	<0.01		NA	NA	NA	<0.05	NA	<5.49		<0.005		
C-285 Copper Extrusion Tank 1 (Pickling Bath)	NA		NA	NA	NA	NA	NA	NA		NA		
C-285 Copper Extrusion Tank 1 Measured Concentration	NA		NA	NA	NA	NA	NA	NA		NA		
C-285 Copper Extrusion Tank 2 (Pickling Rinse)	NA		NA	NA	NA	NA	NA	NA		NA		
C-285 Copper Extrusion Tank 2 Measured Concentration	NA		NA	NA	NA	NA	NA	NA		NA		
C-285 Copper Extrusion Tank 3 (Pickling Bath)	NA		NA	NA	NA	NA	NA	NA		NA		
C-285 Copper Extrusion Tank 3 Measured Concentration	NA		NA	NA	NA	NA	NA	NA		NA		
C-285 Copper Extrusion Tank 4 (Pickling Rinse)	NA		NA	NA	NA	NA	NA	NA		NA		
C-285 Copper Extrusion Tank 4 Measured Concentration	NA		NA	NA	NA	NA	NA	NA		NA		
C-285 Copper Extrusion Tank 5 (Pickling Rinse)	NA		NA	NA	NA	NA	NA	NA		NA		
C-285 Copper Extrusion Tank 5 Measured Concentration	NA		NA	NA	NA	NA	NA	NA		NA		
C-285 Copper Extrusion Tank 6 (Pickling Bath)	43.67		253.31	32.76	321.01	152.86	NA	3,040		NA		
C-285 Copper Extrusion Tank 6 Measured Concentration ²	<0.01		<0.01	<0.005	<0.01	<0.05	NA	<5.75		<0.005		
C-285 Cooling Water Tank (Copper Extrusion) Allowable Concentrations	0.33		1.85	0.24	1.85	0.93	NA	22		NA		
C-285 Cooling Water Tank Measured Concentrations ³	<0.01		<0.01	<0.005	<0.01	<0.05	NA	<5.75		<0.005		

40CFR136 Preservation and Analytical Methods Use: Yes No

¹ Listed as daily maximum and monthly average respectively

² Samples for C-285 Copper Extrusion Tank 6 and Cooling Water Tank were taken from the C-285 line cooling tower.

³ Samples for C-285 Copper Extrusion Tank 6 and Cooling Water Tank were taken from the C-285 line cooling tower.

(6) CERTIFICATION

A. CHECK ONE: CYANIDE ANALYSIS ATTACHED CYANIDE CERTIFICATION PROVIDED BELOW (September SAR Only)

In accordance with §467.03(a), based on my inquiry of the person or persons directly responsible for managing compliance with pretreatment standards, I certify that to the best of my knowledge, cyanide has not been used or generated and will not be used or generated in our processes which are regulated by the Aluminum Forming (40 CFR 467.35) categorical pretreatment standards since analyzing the first wastewater sample in January, February, or March of this calendar year; and that the results of the first analysis contained less than 0.07 mg/l cyanide.

(Typed Name)

(Corporate Officer or authorized representative)

Date of Signature _____

B. CHECK ONE: REQUIRED TOXIC ORGANIC ANALYSIS ATTACHED O&G ANALYSIS ATTACHED

In accordance with §467.03(b) & §468.03(b), as an alternative monitoring procedure for pretreatment, the POTW user may measure and limit oil and grease to the levels shown in Section 5.C in lieu of measuring and regulating total toxic organics (TTO).

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS
COUNTY OF MISSISSIPPI

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 _____, 199__.

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 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(l)]

I certify under penalty of law that I have personally examined and am familiar with the information in this semi-annual compliance report and all attachments, 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
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

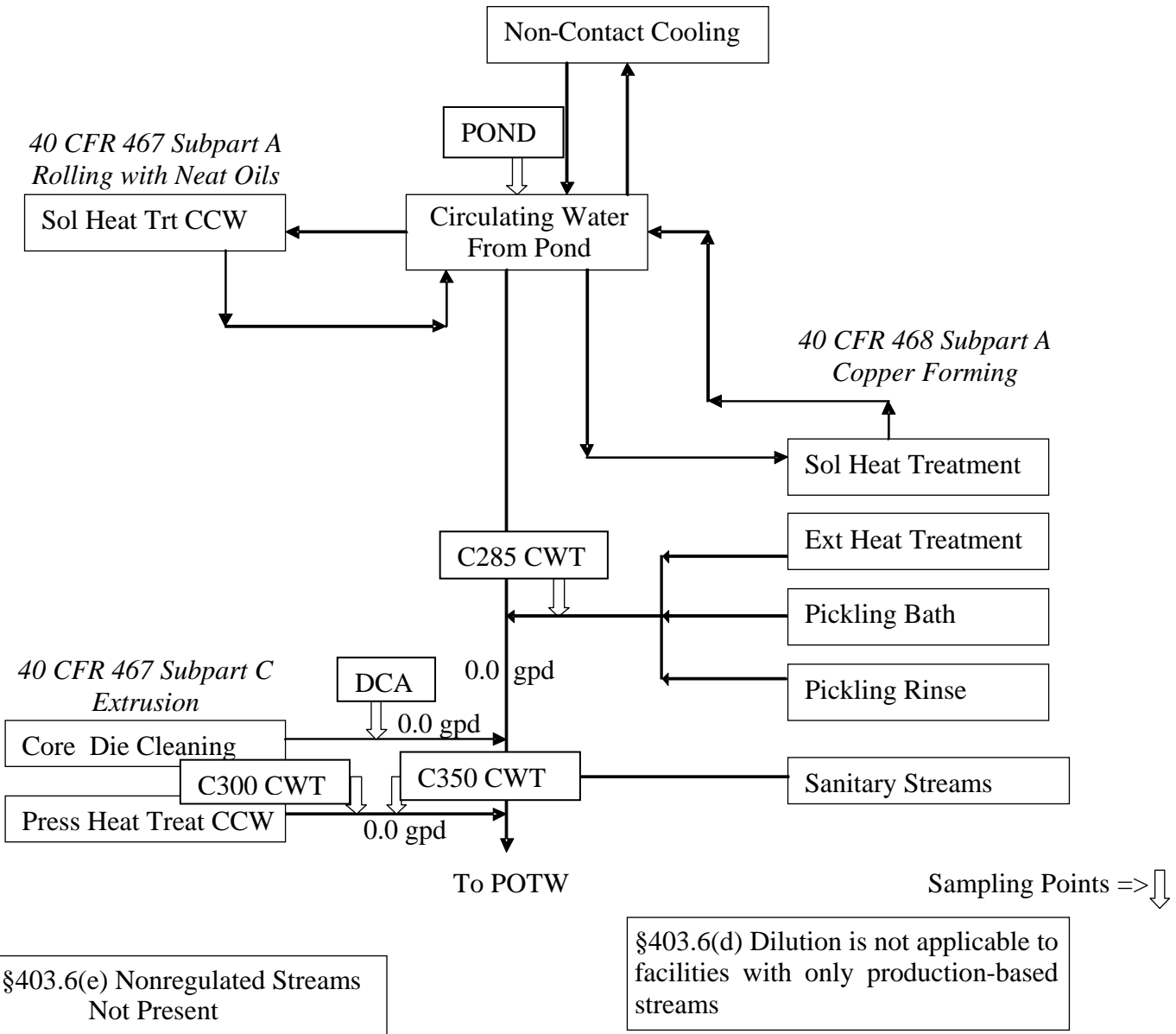
PLANT MANGER
OFFICIAL TITLE

DATE SIGNED

ATTACHMENT 1

Flow Schematics

Algonquin Industries Osceola, Arkansas October 2015



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 (October 2015)

ATTACHMENT 2

Sampling and Analysis Results

September 23, 2015

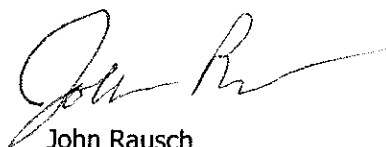
Mr. Allen Gilliam
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

**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