

Wilson, Tabatha

From: Gilliam, Allen
Sent: Thursday, August 21, 2014 1:31 PM
To: jrausch@reawire.com; mstowe@algonquin-industries.com; mstowe@reawire.com
Cc: Fuller, Kim; Wilson, Tabatha
Subject: AR0021580_Rea ARP000020 March 2014 semi annual Pretreatment report with ADEQ reply_20140821
Attachments: REA's March 2014 Semi annual Pretreatment Report-tw.pdf

John,

Apologies for the tardy response to Rea's semi-annual Pretreatment report. Further, without knowing Rea's processes, discharge practices and the data provided on Rea's March 2014 semi-annual report, this office was confused not knowing the rationale for your production based (converted to concentration) limits in 40 CFRs 467 and 468.

Based on our phone conversation today you indicated there was no regulated wastewater discharged to the City of Osceola's collection system during the six (6) previous months up and through March 2014.

The analyticals attached to the report were not necessary. Do you have an idea whose requirement it was for this sampling when there is no discharge to the City?

You had also indicated there has been no regulated wastewater discharged to the City since last March. Sampling/analyzing the pollutants regulated under 40 CFRs 467 & 468 is not necessary for your September semi-annual report. A simple letter certifying something to the effect of zero discharge to the City will suffice.

Please notify this office immediately of Rea's future process/equipment changes to achieve zero discharge.

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

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

E/NPDES/NPDES/Pretreatment/Reports



Rea Magnet Wire Company, Inc.

Rea Magnet Wire Company, Inc.
Osceola Plant
1800 US Hwy 61 South
Osceola, AR 72370
Phone (870) 622-4404

March 28, 2014

Arkansas Department of Environmental Quality
Mr. Allen Gilliam
5301 Northshore Drive
North Little Rock, AR 72118-5328
501-682-0625

Re: Submittal of Semi-Annual Report, Osceola Plant

Dear Mr. Gilliam:

Please find enclosed the above referenced document and copies of the analytical results of the sampling used to determine compliance.

Please note the following:

1. A revised version of ADEQ's semi-annual report form was used. The form was revised to clarify information for both ADEQ and Algonquin. The form meets all of the informational requirements of 40 CFR 403.12(e).
2. Limitations for batch discharges were calculated using the production data from a specific time period beginning with the date of the most recent batch discharge and ending with the date the samples (reported herein) were collected. Production data for partial (split) months were prorated.

If you need additional information, please contact me at (870) 622-4425.

Sincerely,

A handwritten signature in cursive script that reads 'John Rausch'.

John Rausch
Operations Manager (Plant Manager), Osceola Plant
Rea Magnet Wire Company, Inc.

Enclosures

cc: James Carlock, Superintendent
Osceola Water Dept
PO Box 443
Osceola, AR 72370

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

ATTN: Water Div/NPDES Pretreatment

| (1) IDENTIFYING INFORMATION | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|----------------------------------|------------------------------|------------------------|--|--|-----------------------------------|---------|----------------------------------|--------------------------|--|--|-----------------------------|-----------|------------------------------|--------------------------|--|--|-------------------------------------|---------|------------------------------|-------------------------------------|---------|------------------------------|----------------------|--|--|--------------------------------------|-----------|----------------------------------|------------------------|--|--|----------------------------------|-----------|------------------------------|---------------------------------|-----------|------------------------------|--|-----------|------------------------------|--|
| A. LEGAL NAME & MAILING ADDRESS Rea Magnet Wire, Algonquin Industries, Osceola Plant 1800 Highway 61 South Osceola, AR 72370 | B. FACILITY & LOCATION ADDRESS Rea Magnet Wire, Algonquin Industries, Osceola Plant 1800 Highway 61 South Osceola, AR 72370 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| C. FACILITY CONTACT: John Rausch (jrausch@reawire.com) TELEPHONE NUMBER: 870-622-4413 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (2) REPORTING PERIOD--FISCAL YEAR | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2013 (Both Semi-Annual Reports to Cover Fiscal Year) | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| A. MONTHS WHICH REPORTS ARE DUE September & March | B. PERIOD COVERED BY THIS REPORT FROM: September 30, 2013 - March 31, 2014 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (3) DESCRIPTION OF OPERATION | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| A. Regulated Processes per 40 CFR Part 467 (Aluminum) Subpart A & C and 40 CFR Part 468 (Copper) Subpart A | 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. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1" style="width:100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">PROCESS</th> <th style="text-align: center;">PRODUCTION-OFF/LB</th> <th style="text-align: center;">PRODUCTION DAYS¹</th> </tr> </thead> <tbody> <tr> <td>Rolled Aluminum</td> <td></td> <td></td> </tr> <tr> <td>(§467.15 Solution Heat Treatment)</td> <td style="text-align: center;">754,979</td> <td style="text-align: center;">7/1/2011 – 3/19/2014 992 days</td> </tr> <tr> <td>Extruded Aluminum</td> <td></td> <td></td> </tr> <tr> <td>(§467.35 Core Die Cleaning)</td> <td style="text-align: center;">1,461,351</td> <td style="text-align: center;">9/30/2013 – 3/19/2014 170</td> </tr> <tr> <td>Extruded Aluminum</td> <td></td> <td></td> </tr> <tr> <td>(§467.35 Press Heat Treatment) C300</td> <td style="text-align: center;">816,726</td> <td style="text-align: center;">9/30/2013 – 3/19/2014 170</td> </tr> <tr> <td>(§467.35 Press Heat Treatment) C350</td> <td style="text-align: center;">644,625</td> <td style="text-align: center;">9/30/2013 – 3/19/2014 170</td> </tr> <tr> <td>Rolled Copper</td> <td></td> <td></td> </tr> <tr> <td>(§468.14(d) Solution Heat Treatment)</td> <td style="text-align: center;">9,228,353</td> <td style="text-align: center;">7/1/2011 – 3/19/2014 992 days</td> </tr> <tr> <td>Extruded Copper</td> <td></td> <td></td> </tr> <tr> <td>(§468.14(k) Pickling Rinse) C285</td> <td style="text-align: center;">2,086,174</td> <td style="text-align: center;">9/30/2013 – 3/19/2014 170</td> </tr> <tr> <td>(§468.14(m) Pickling Bath) C285</td> <td style="text-align: center;">2,086,174</td> <td style="text-align: center;">9/30/2013 – 3/19/2014 170</td> </tr> <tr> <td>(§468.14(e) Extrusion Heat Treatment) C285</td> <td style="text-align: center;">2,086,174</td> <td style="text-align: center;">9/30/2013 – 3/19/2014 170</td> </tr> </tbody> </table> | PROCESS | PRODUCTION-OFF/LB | PRODUCTION DAYS ¹ | Rolled Aluminum | | | (§467.15 Solution Heat Treatment) | 754,979 | 7/1/2011 – 3/19/2014 992 days | Extruded Aluminum | | | (§467.35 Core Die Cleaning) | 1,461,351 | 9/30/2013 – 3/19/2014 170 | Extruded Aluminum | | | (§467.35 Press Heat Treatment) C300 | 816,726 | 9/30/2013 – 3/19/2014 170 | (§467.35 Press Heat Treatment) C350 | 644,625 | 9/30/2013 – 3/19/2014 170 | Rolled Copper | | | (§468.14(d) Solution Heat Treatment) | 9,228,353 | 7/1/2011 – 3/19/2014 992 days | Extruded Copper | | | (§468.14(k) Pickling Rinse) C285 | 2,086,174 | 9/30/2013 – 3/19/2014 170 | (§468.14(m) Pickling Bath) C285 | 2,086,174 | 9/30/2013 – 3/19/2014 170 | (§468.14(e) Extrusion Heat Treatment) C285 | 2,086,174 | 9/30/2013 – 3/19/2014 170 | |
| PROCESS | PRODUCTION-OFF/LB | PRODUCTION DAYS ¹ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rolled Aluminum | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (§467.15 Solution Heat Treatment) | 754,979 | 7/1/2011 – 3/19/2014 992 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Extruded Aluminum | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (§467.35 Core Die Cleaning) | 1,461,351 | 9/30/2013 – 3/19/2014 170 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Extruded Aluminum | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (§467.35 Press Heat Treatment) C300 | 816,726 | 9/30/2013 – 3/19/2014 170 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (§467.35 Press Heat Treatment) C350 | 644,625 | 9/30/2013 – 3/19/2014 170 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rolled Copper | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (§468.14(d) Solution Heat Treatment) | 9,228,353 | 7/1/2011 – 3/19/2014 992 days | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Extruded Copper | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (§468.14(k) Pickling Rinse) C285 | 2,086,174 | 9/30/2013 – 3/19/2014 170 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (§468.14(m) Pickling Bath) C285 | 2,086,174 | 9/30/2013 – 3/19/2014 170 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| (§468.14(e) Extrusion Heat Treatment) C285 | 2,086,174 | 9/30/2013 – 3/19/2014 170 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ¹ The entry for "Production Days" for solution, press heat treatment, and pickling and rinse operations are dates of the batch discharges or initial startup and the dates of the sampling. Only the Core Die Cleaning operation has a continuous discharge | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| C. Number of Regular Employees at this Facility: 42 | D. [Reserved] | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

(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 | NA | 26,667 gallons discharged to the POTW July 1, 2011 (most recent discharge) | Batch discharge from recirculation pond |
| §467.35 Cleaning or Etching Rinse (Aluminum Extrusion) | NA | NA | Not in service | Batch discharge to either POTW or waste oil tank |
| 467.35 Cleaning or Etching Bath (Aluminum Extrusion) | NA | NA | Not in service | Batch discharge to either POTW or waste oil tank |
| §467.35 Press Heat Treatment (Aluminum Extrusion) | NA | NA | Not in service | Batch discharge from Aluminum Extrusion (C-350) Product Cooling Tank |
| §468.14(m) Pickling Bath (Copper Extrusion) | 2.35 | 170 | Two 200-gallon tanks discharged September 30, 2013 | Batch discharge to either POTW or waste oil tank |
| §468.14(k) Pickling Rinse (Copper Extrusion) | NA | NA | Not in service | Batch discharge to either POTW or waste oil tank |
| §468.14(e) Extrusion Heat Treatment (Copper Extrusion) | 1.18 | 170 | One 200-gallon tank discharged September 30, 2013 | Batch discharge from Copper Extrusion (C-285) Product Cooling Tank |
| §467.35 Core-Die Cleaner (Aluminum Extrusion) | 20 | N/A | N/A | Intermittent |
| §467.35 Press Heat Treatment (Aluminum Extrusion) | 7.65 | 170 | One 1,300-gallon tank, discharged September 30, 2013 | Batch discharge from Aluminum Extrusion (C-300 & C-500) Cooling Water Tank |
| §468.14(d) Solution Heat Treatment ¹ (Copper Forming [Rolling]) | NA | NA | 26,667 gallons discharged to the POTW July 1, 2011 (most recent discharge) | Batch discharge from recirculation pond |
| §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 | 120.8 | NA | NA | NA | 408.0 | NA | 17,300 | 81.6 |
| C-300 Cooling Water Tank Measured Concentrations | <0.007 | NA | NA | NA | 0.039 | NA | <5 | <0.01 |
| Die Cleaning Allowable Concentrations ¹ | 8 3.1 | NA | NA | NA | 25 10 | NA | 928 453 | 5 2.1 |
| Die Cleaning Measured Concentrations | 0.008 | NA | NA | NA | 0.20 | NA | <5 | <0.01 |
| Pond Allowable Concentration | 2.023 | 8.935 | 1.148 | 11.342 | 6.864 | NA | 167 | 0.283 |
| Pond Measured Concentration | <0.007 | 0.31 | <0.04 | <0.01 | 0.059 | NA | <5 | <0.01 |
| 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 | 28.6 | NA | NA | NA | 96.6 | NA | 4,096 | 19.3 |
| C-350 Cooling Water Tank Measured Concentrations | <0.007 | NA | NA | NA | 0.015 | NA | <5 | <0.01 |
| 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) | 23.6 | 136.87 | 17.70 | 173.45 | 82.59 | NA | 1,642 | NA |
| C-285 Copper Extrusion Tank 6 Measured Concentration | <0.007 | 1.2 | <0.04 | <0.01 | 0.039 | NA | <5 | <0.01 |
| C-285 Cooling Water Tank (Copper Extrusion) Allowable Concentrations | 0.180 | 1.001 | 0.130 | 1.001 | 0.500 | NA | 12 | NA |
| C-285 Cooling Water Tank Measured Concentrations ² | <0.007 | 1.2 | <0.04 | <0.01 | 0.039 | NA | <5 | <0.01 |

40CFR136 Preservation and Analytical Methods Use: Yes No

¹ Listed as daily maximum and monthly average respectively

² Volume composite sample taken for all tanks

(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:

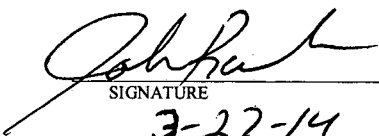
(8) GENERAL COMMENTS

(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

OPERATIONS MANAGER (PLANT MANGER)
OFFICIAL TITLE


SIGNATURE
3-27-14
DATE SIGNED

ATTACHMENT 1

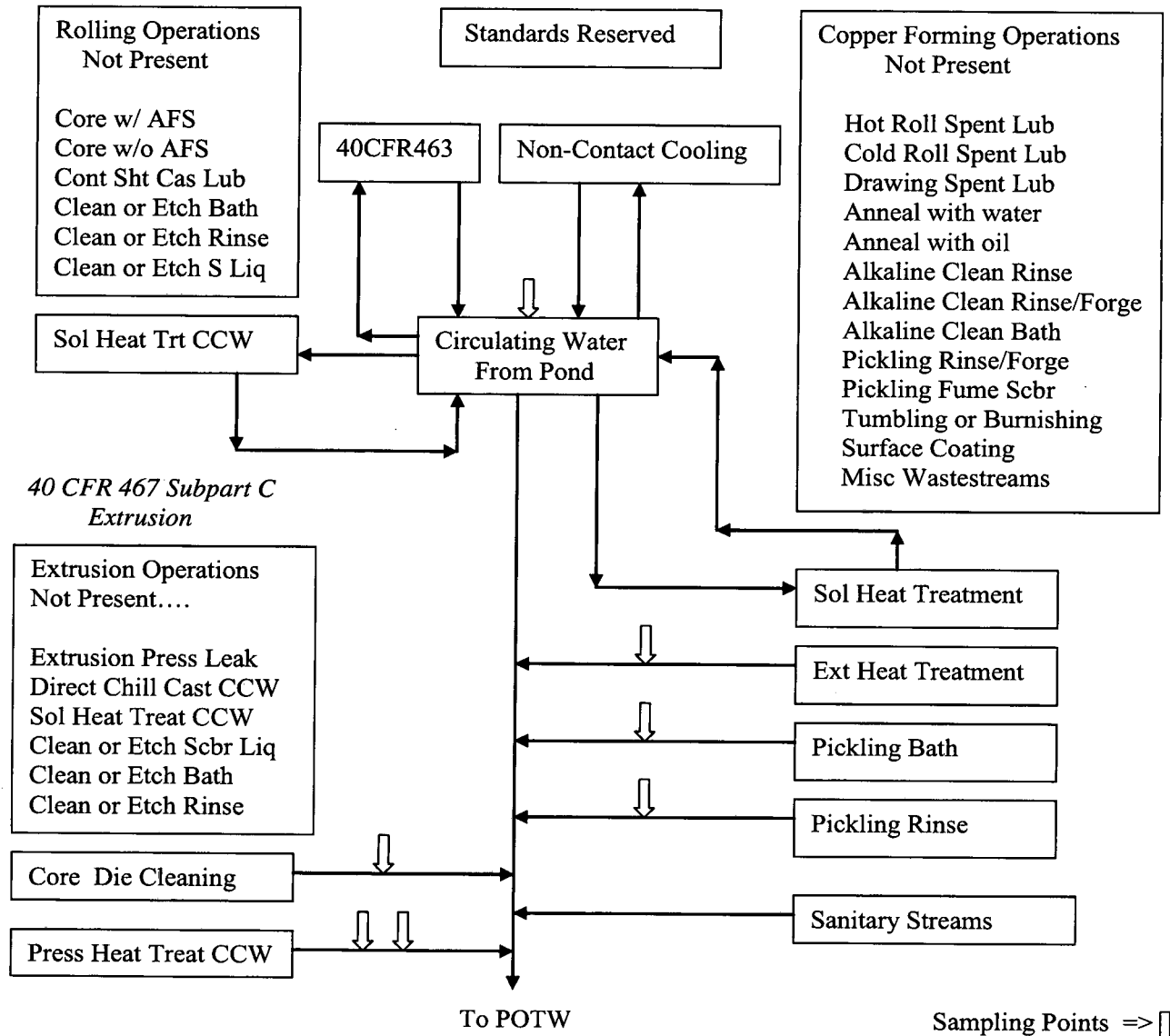
Flow Schematics

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 prod-based 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.

[Signature]
Plant Manager or the authorized §403.12(l) official

3-27-14
Date
AGQ Diagram (March 21, 2011)

ATTACHMENT 2

Sampling and Analysis Results



Algonquin Industries
ATTN: Mr. Michael Kelly
1800 Hwy 61 South
Osceola, AR 72370

This report replaces American Interplex Corporation (AIC) Control No. 176554 originally sent on March 24, 2014. This report contains the analytical results and supporting information for samples submitted on March 20, 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.

Report provided as supplemental to add results for Nickel for Control No. 176554-4 and 176554-5.

A handwritten signature in cursive script that reads 'Steve Bradford'.

Steve Bradford
Deputy Laboratory Director

This document has been distributed to the following:

PDF cc: Algonquin Industries
ATTN: Mr. Michael Kelly
mkelly@reawire.com

Algonquin Industries
1800 Hwy 61 South
Osceola, AR 72370

SAMPLE INFORMATION

Project Description:

Five (5) water sample(s) received on March 20, 2014
POTW DMR

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> |
|----------------------|-------------------------|--------------------------|--------------|
| 176554-1 | C350 19Mar2014 8:00am | 19-Mar-2014 0800 | |
| 176554-2 | C300 19Mar2014 8:30am | 19-Mar-2014 0830 | |
| 176554-3 | Die 19Mar2014 9:00am | 19-Mar-2014 0900 | |
| 176554-4 | C285 19Mar2014 8:15am | 19-Mar-2014 0815 | |
| 176554-5 | Pond 19Mar2014 | 19-Mar-2014 | 1 |

Notes:

1. Sample label was incomplete in regard to date/time of sampling

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", 21st edition.
- "American Society for Testing and Materials" (ASTM).
- "Association of Analytical Chemists" (AOAC).

Algonquin Industries
1800 Hwy 61 South
Osceola, AR 72370

ANALYTICAL RESULTS

AIC No. 176554-1

Sample Identification: C350 19Mar2014 8:00am

| Analyte | Result | RL | Units | Qualifier |
|--|--|-------|---------------|-----------|
| Total Cyanide SM 4500-CN C,E 1999 Prep: 20-Mar-2014 1320 by 308 | < 0.01 Analyzed: 21-Mar-2014 0819 by 308 | 0.01 | mg/l | |
| | | | Batch: W47023 | |
| Chromium EPA 200.7 Prep: 20-Mar-2014 1349 by 305 | < 0.007 Analyzed: 21-Mar-2014 1321 by 305 | 0.007 | mg/l | |
| | | | Batch: S36466 | |
| Zinc EPA 200.7 Prep: 20-Mar-2014 1349 by 305 | 0.015 Analyzed: 21-Mar-2014 1321 by 305 | 0.002 | mg/l | |
| | | | Batch: S36466 | |
| Oil and Grease EPA 1664A Prep: 21-Mar-2014 0803 by 295 | < 5 Analyzed: 21-Mar-2014 1107 by 295 | 5 | mg/l | |
| | | | Batch: B8859 | |

AIC No. 176554-2

Sample Identification: C300 19Mar2014 8:30am

| Analyte | Result | RL | Units | Qualifier |
|--|--|-------|---------------|-----------|
| Total Cyanide SM 4500-CN C,E 1999 Prep: 20-Mar-2014 1320 by 308 | < 0.01 Analyzed: 21-Mar-2014 0821 by 308 | 0.01 | mg/l | |
| | | | Batch: W47023 | |
| Chromium EPA 200.7 Prep: 20-Mar-2014 1349 by 305 | < 0.007 Analyzed: 21-Mar-2014 1325 by 305 | 0.007 | mg/l | |
| | | | Batch: S36466 | |
| Zinc EPA 200.7 Prep: 20-Mar-2014 1349 by 305 | 0.039 Analyzed: 21-Mar-2014 1325 by 305 | 0.002 | mg/l | |
| | | | Batch: S36466 | |
| Oil and Grease EPA 1664A Prep: 21-Mar-2014 0803 by 295 | < 5 Analyzed: 21-Mar-2014 1107 by 295 | 5 | mg/l | |
| | | | Batch: B8859 | |

AIC No. 176554-3

Sample Identification: Die 19Mar2014 9:00am

| Analyte | Result | RL | Units | Qualifier |
|--|---|-------|---------------|-----------|
| Total Cyanide SM 4500-CN C,E 1999 Prep: 20-Mar-2014 1320 by 308 | < 0.01 Analyzed: 21-Mar-2014 0823 by 308 | 0.01 | mg/l | |
| | | | Batch: W47023 | |
| Chromium EPA 200.7 Prep: 20-Mar-2014 1349 by 305 | 0.0081 Analyzed: 21-Mar-2014 1329 by 305 | 0.007 | mg/l | |
| | | | Batch: S36466 | |
| Zinc EPA 200.7 Prep: 20-Mar-2014 1349 by 305 | 0.20 Analyzed: 21-Mar-2014 1329 by 305 | 0.002 | mg/l | |
| | | | Batch: S36466 | |
| Oil and Grease EPA 1664A Prep: 21-Mar-2014 0803 by 295 | < 5 Analyzed: 21-Mar-2014 1107 by 295 | 5 | mg/l | |
| | | | Batch: B8859 | |

AIC No. 176554-4

Sample Identification: C285 19Mar2014 8:15am

| Analyte | Result | RL | Units | Qualifier |
|--|--|-------|---------------|-----------|
| Total Cyanide SM 4500-CN C,E 1999 Prep: 20-Mar-2014 1320 by 308 | < 0.01 Analyzed: 21-Mar-2014 0824 by 308 | 0.01 | mg/l | |
| | | | Batch: W47023 | |
| Chromium EPA 200.7 Prep: 20-Mar-2014 1349 by 305 | < 0.007 Analyzed: 21-Mar-2014 1333 by 305 | 0.007 | mg/l | |
| | | | Batch: S36466 | |

Algonquin Industries
1800 Hwy 61 South
Osceola, AR 72370

ANALYTICAL RESULTS

AIC No. 176554-4 (Continued)

Sample Identification: C285 19Mar2014 8:15am

| Analyte | | Result | RL | Units | Qualifier |
|-----------------------|-------------------------------|-----------------------------------|--------------|---------------|------------------|
| Copper | | 1.2 | 0.006 | mg/l | |
| EPA 200.7 | Prep: 20-Mar-2014 1349 by 305 | Analyzed: 21-Mar-2014 1333 by 305 | | Batch: S36466 | |
| Lead | | < 0.04 | 0.04 | mg/l | |
| EPA 200.7 | Prep: 20-Mar-2014 1349 by 305 | Analyzed: 21-Mar-2014 1333 by 305 | | Batch: S36466 | |
| Nickel | | < 0.01 | 0.01 | mg/l | |
| EPA 200.7 | Prep: 20-Mar-2014 1349 by 305 | Analyzed: 21-Mar-2014 1333 by 305 | | Batch: S36466 | |
| Zinc | | 0.039 | 0.002 | mg/l | |
| EPA 200.7 | Prep: 20-Mar-2014 1349 by 305 | Analyzed: 21-Mar-2014 1333 by 305 | | Batch: S36466 | |
| Oil and Grease | | < 5 | 5 | mg/l | |
| EPA 1664A | Prep: 21-Mar-2014 0803 by 295 | Analyzed: 21-Mar-2014 1107 by 295 | | Batch: B8859 | |

AIC No. 176554-5

Sample Identification: Pond 19Mar2014

| Analyte | | Result | RL | Units | Qualifier |
|-----------------------|-------------------------------|-----------------------------------|--------------|---------------|------------------|
| Total Cyanide | | < 0.01 | 0.01 | mg/l | |
| SM 4500-CN C,E 1999 | Prep: 20-Mar-2014 1320 by 308 | Analyzed: 21-Mar-2014 0826 by 308 | | Batch: W47023 | |
| Chromium | | < 0.007 | 0.007 | mg/l | |
| EPA 200.7 | Prep: 20-Mar-2014 1349 by 305 | Analyzed: 21-Mar-2014 1336 by 305 | | Batch: S36466 | |
| Copper | | 0.31 | 0.006 | mg/l | |
| EPA 200.7 | Prep: 20-Mar-2014 1349 by 305 | Analyzed: 21-Mar-2014 1336 by 305 | | Batch: S36466 | |
| Lead | | < 0.04 | 0.04 | mg/l | |
| EPA 200.7 | Prep: 20-Mar-2014 1349 by 305 | Analyzed: 21-Mar-2014 1336 by 305 | | Batch: S36466 | |
| Nickel | | < 0.01 | 0.01 | mg/l | |
| EPA 200.7 | Prep: 20-Mar-2014 1349 by 305 | Analyzed: 21-Mar-2014 1336 by 305 | | Batch: S36466 | |
| Zinc | | 0.059 | 0.002 | mg/l | |
| EPA 200.7 | Prep: 20-Mar-2014 1349 by 305 | Analyzed: 21-Mar-2014 1336 by 305 | | Batch: S36466 | |
| Oil and Grease | | < 5 | 5 | mg/l | |
| EPA 1664A | Prep: 21-Mar-2014 0803 by 295 | Analyzed: 21-Mar-2014 1107 by 295 | | Batch: B8859 | |

Algonquin Industries
 1800 Hwy 61 South
 Osceola, AR 72370

LABORATORY CONTROL SAMPLE RESULTS

| Analyte | Spike Amount | % | Limits | RPD | Limit | Batch | Preparation Date | Analysis Date | Dil | Qual |
|----------------|--------------|------|----------|------|-------|--------|---------------------|---------------------|-----|------|
| Total Cyanide | 0.1 mg/l | 108 | 85.0-115 | | | W47023 | 20Mar14 1321 by 308 | 21Mar14 0811 by 308 | | |
| Chromium | 0.5 mg/l | 101 | 85.0-115 | | | S36466 | 20Mar14 1349 by 305 | 21Mar14 1227 by 305 | | |
| Copper | 0.5 mg/l | 98.2 | 85.0-115 | | | S36466 | 20Mar14 1349 by 305 | 21Mar14 1227 by 305 | | |
| Lead | 5 mg/l | 103 | 85.0-115 | | | S36466 | 20Mar14 1349 by 305 | 21Mar14 1227 by 305 | | |
| Nickel | 0.5 mg/l | 104 | 85.0-115 | | | S36466 | 20Mar14 1349 by 305 | 21Mar14 1227 by 305 | | |
| Zinc | 0.5 mg/l | 102 | 85.0-115 | | | S36466 | 20Mar14 1349 by 305 | 21Mar14 1227 by 305 | | |
| Oil and Grease | 40 mg/l | 107 | 78.0-114 | | | B8859 | 21Mar14 0804 by 295 | 21Mar14 1107 by 295 | | |
| | 40 mg/l | 105 | 78.0-114 | 1.89 | 20.0 | B8859 | 21Mar14 0804 by 295 | 21Mar14 1107 by 295 | | |

MATRIX SPIKE SAMPLE RESULTS

| Analyte | Sample | Spike Amount | % | Limits | Batch | Preparation Date | Analysis Date | Dil | Qual |
|---------------|------------------------------|--------------|--------|----------|--------|---------------------|---------------------|-----|------|
| Total Cyanide | 176559-2 | 0.1 mg/l | 102 | 75.0-125 | W47023 | 20Mar14 1321 by 308 | 21Mar14 0815 by 308 | | |
| | 176559-2 | 0.1 mg/l | 103 | 75.0-125 | W47023 | 20Mar14 1321 by 308 | 21Mar14 0817 by 308 | | |
| | Relative Percent Difference: | | 0.378 | 20.0 | W47023 | | | | |
| Chromium | 176232-2 | 0.5 mg/l | 102 | 75.0-125 | S36466 | 20Mar14 1349 by 305 | 21Mar14 1230 by 305 | | |
| | 176232-2 | 0.5 mg/l | 103 | 75.0-125 | S36466 | 20Mar14 1349 by 305 | 21Mar14 1234 by 305 | | |
| | Relative Percent Difference: | | 0.638 | 20.0 | S36466 | | | | |
| Copper | 176232-2 | 0.5 mg/l | 99.3 | 75.0-125 | S36466 | 20Mar14 1349 by 305 | 21Mar14 1230 by 305 | | |
| | 176232-2 | 0.5 mg/l | 99.3 | 75.0-125 | S36466 | 20Mar14 1349 by 305 | 21Mar14 1234 by 305 | | |
| | Relative Percent Difference: | | 0.0762 | 20.0 | S36466 | | | | |
| Lead | 176232-2 | 5 mg/l | 105 | 75.0-125 | S36466 | 20Mar14 1349 by 305 | 21Mar14 1230 by 305 | | |
| | 176232-2 | 5 mg/l | 105 | 75.0-125 | S36466 | 20Mar14 1349 by 305 | 21Mar14 1234 by 305 | | |
| | Relative Percent Difference: | | 0.841 | 20.0 | S36466 | | | | |
| Nickel | 176232-2 | 0.5 mg/l | 105 | 75.0-125 | S36466 | 20Mar14 1349 by 305 | 21Mar14 1230 by 305 | | |
| | 176232-2 | 0.5 mg/l | 105 | 75.0-125 | S36466 | 20Mar14 1349 by 305 | 21Mar14 1234 by 305 | | |
| | Relative Percent Difference: | | 0.539 | 20.0 | S36466 | | | | |
| Zinc | 176232-2 | 0.5 mg/l | 101 | 75.0-125 | S36466 | 20Mar14 1349 by 305 | 21Mar14 1230 by 305 | | |
| | 176232-2 | 0.5 mg/l | 102 | 75.0-125 | S36466 | 20Mar14 1349 by 305 | 21Mar14 1234 by 305 | | |
| | Relative Percent Difference: | | 0.546 | 20.0 | S36466 | | | | |

LABORATORY BLANK RESULTS

| Analyte | Result | RL | PQL | QC Sample | Preparation Date | Analysis Date | Qual |
|----------------|--------------|-------|-------|-----------|---------------------|---------------------|------|
| Total Cyanide | < 0.01 mg/l | 0.01 | 0.01 | W47023-1 | 20Mar14 1321 by 308 | 21Mar14 0809 by 308 | |
| Chromium | < 0.007 mg/l | 0.007 | 0.007 | S36466-1 | 20Mar14 1349 by 305 | 21Mar14 1223 by 305 | |
| Copper | < 0.006 mg/l | 0.006 | 0.006 | S36466-1 | 20Mar14 1349 by 305 | 21Mar14 1223 by 305 | |
| Lead | < 0.04 mg/l | 0.04 | 0.04 | S36466-1 | 20Mar14 1349 by 305 | 21Mar14 1223 by 305 | |
| Nickel | < 0.01 mg/l | 0.01 | 0.01 | S36466-1 | 20Mar14 1349 by 305 | 21Mar14 1223 by 305 | |
| Zinc | < 0.002 mg/l | 0.002 | 0.002 | S36466-1 | 20Mar14 1349 by 305 | 21Mar14 1223 by 305 | |
| Oil and Grease | < 2 mg/l | 2 | 5 | B8859-1 | 21Mar14 0804 by 295 | 21Mar14 1107 by 295 | |



CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

| Client: <u>Rea Magnet Wire (Algonquin)</u> | | | PO No. | | NO OF BOTTLES | ANALYSES REQUESTED ¹ | | | | | | | | | | AIC CONTROL NO: <u>17654</u> | | | | | | | | | | | | | | | | | | | | | |
|---|-----------------------|------------------------|---------------|---------------------|---------------|---------------------------------|------------|------------------------|---|---|---|---|---|---|---|---------------------------------|---|---|---|------------------|---------|---------------------------------------|--|---------------------------------------|--|---|--|--------------------------------|--|--|--|--|--|--|--|--|--|
| Project Reference: <u>POTW DMR</u> | | | SAMPLE MATRIX | | | Cyanide | Cr, Zn, Pb | Cu, Pb | | | | | | | | | | | | AIC PROPOSAL NO: | | | | | | | | | | | | | | | | | |
| Project Manager: <u>Michael Kelly</u> | | | WATER | SOIL | 3 | | | | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | 3 | Carrier/Tracking No. <u>UPS</u> | | | | | | | | | | | | | | | |
| Sampled By: <u>Bobby Hill / Ron Hastings</u> | | | | | | GRAB | COMP | | | | | | | | | | | | | | | Received Temperature C <u>0.6 C</u> | | | | | | | | | | | | | | | |
| AIC No. | Sample Identification | Date/Time Collected | GRAB | COMP | WATER | SOIL | | | | | | | | | | | | | | | Remarks | | | | | | | | | | | | | | | | |
| 1 | C350 | 19 Mar 2014 9:20 am | X | | X | | | | | | | | | | | | | | | | | Time 8:00 AM | | | | | | | | | | | | | | | |
| 2 | C300 | | X | | X | | | | | | | | | | | | | | | | | 8:30 am | | | | | | | | | | | | | | | |
| 3 | Die | | X | | X | | | | | | | | | | | | | | | | | 9:00 am | | | | | | | | | | | | | | | |
| 4 | C285 | | | X | X | | | | | | | | | | | | | | | | | 8:15 am | | | | | | | | | | | | | | | |
| 5 | Pond | | X | | X | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Container Type | | | | | | | | | | | | | | | | | | | | | | Field pH calibration | | | | | | | | | | | | | | | |
| Preservative | | | | | | | | | | | | | | | | | | | | | | on _____ @ _____ | | | | | | | | | | | | | | | |
| G = Glass | | P = Plastic | | V = VOA vials | | H = HCl to pH2 | | T = Sodium Thiosulfate | | | | | | | | | | | | Buffer: | | | | | | | | | | | | | | | | | |
| NO = none | | S = Sulfuric acid pH2 | | N = Nitric acid pH2 | | B = NaOH to pH12 | | Z = Zinc acetate | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Turnaround Time Requested: (Please circle) <u>NORMAL</u> or EXPEDITED IN _____ DAYS | | | | | | | | | | | | | | | | | | | | | | Relinquished By: <u>Michael Kelly</u> | | Date/Time: <u>19 Mar 2014 9:20 am</u> | | Received By: | | Date/Time: | | | | | | | | | |
| Expedited results requested by: _____ | | | | | | | | | | | | | | | | | | | | | | Relinquished By: | | Date/Time: | | Received in Lab By: <u>Supper Hyter</u> | | Date/Time: <u>3-20-14 0940</u> | | | | | | | | | |
| Who should AIC contact with questions: _____ | | | | | | | | | | | | | | | | | | | | | | Comments: | | | | | | | | | | | | | | | |
| Phone: _____ Fax: _____ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Report Attention to: _____ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Report Address to: _____ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

LEO

Express

A
8308
03/28
1
177
RT
2
ST

From: (870) 622-4413
John Rausch
Rea Algonquin Industries
1800 S US Highway 61

Origin ID: JBRA



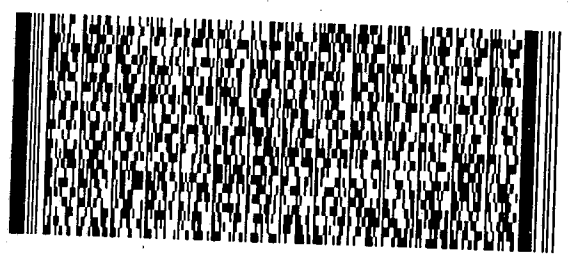
J14101402070326

Osceola, AR 72370

SHIP TO: (501) 682-0625
Mr. Allen Gilliam
Ar Dept of Environmental Quality
5301 Northshore Drive

BILL SENDER

NORTH LITTLE ROCK, AR 72118



Ship Date: 27MAR14
ActWgt: 0.5 LB
CAD: 102379368/NET3490

Delivery Address Bar Code



Ref #
Invoice #
PO #
Dept #

FRI - 28 MAR AA
STANDARD OVERNIGHT

TRK# 7983 5355 8308
0201

X2 LITA

72118
AR-US
LIT



522G1/CC4F/F220

The World On Time.

Envelope

Align bottom of **Peel and Stick Airbill** or **Pouch** here.