

## Gage, Hannah

---

**From:** Gilliam, Allen  
**Sent:** Monday, November 07, 2016 1:34 PM  
**To:** 'jrausch@reawire.com'  
**Cc:** Gage, Hannah; Yates, Adam; McWilliams, Carrie; Leamons, Bryan; 'bhaynes58@yahoo.com'; 'etidquist@Ensaf.com'; Ramsey, David  
**Subject:** AR0021580\_Rea Wire ARP000020 Sept 2016 semi annual Pretreatment Report\_20161107  
**Attachments:** ScaNovaCopy16091608500.pdf

John,

Rea Wire's September 2016 semi-annual Pretreatment report was electronically received on 9/16/16 followed by an e-addendum from Eric Tidquist (EnSafe) on 11/7/16 helping to clarify how Rea converted its production based standards to alternative concentration limits.

Rea's semi-annual report is deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically compliant with the Aluminum Forming operations under 40 CFR 467.35.

If Rea Wire's operations are to cease in Osceola, Rea must notify this office of the date of closure.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

cc: Brandon Haynes, Osceola Water & Wastewater Superintendent  
Eric Tidquist, EnSafe consultant for Rea

E/NPDES/NPDES/Pretreatment/Reports

**Algonquin Industries Division**  
1800 Highway 61 South  
Osceola, AR 72370

Tel (870) 563-5207  
Fax (870) 563-1207



**Algonquin Industries Division**  
**Osceola Plant**

September 15, 2016

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

**Re:   Semi-Annual Wastewater Monitoring Report**  
**Rea Magnet Wire Company, Inc. — Algonquin Industries Division**  
**Osceola, Arkansas Plant**

Dear Mr. Gilliam:

Please find enclosed the semi-annual wastewater monitoring report for the March 2016 — August 2016 monitoring period including a flow schematic, copies of the analytical results of the sampling, and a process description for the facility. A spreadsheet containing updated limitation calculations for the discharges from the facility will accompany the electronic submittal of this report.

If you need any additional information, please contact Joe Crews at (870) 622-4404 or by email at [jcrews@reawire.com](mailto:jcrews@reawire.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'John Rausch', written over a horizontal line.

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

Enclosures

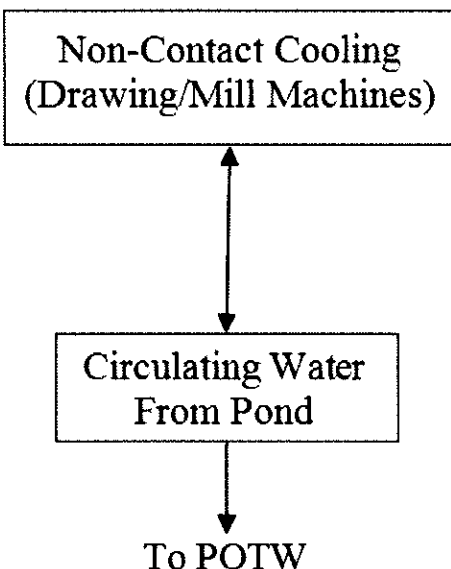
cc:   James Carlock, Superintendent  
      Osceola Water Department  
      PO Box 443  
      Osceola, Arkansas 72370

## Semi-Annual Wastewater Monitoring Report Wastewater Process Description

At its Osceola, Arkansas plant, Rea – Algonquin Industries Division manufactures specialty aluminum and copper wire products.

### Drawing and Milling

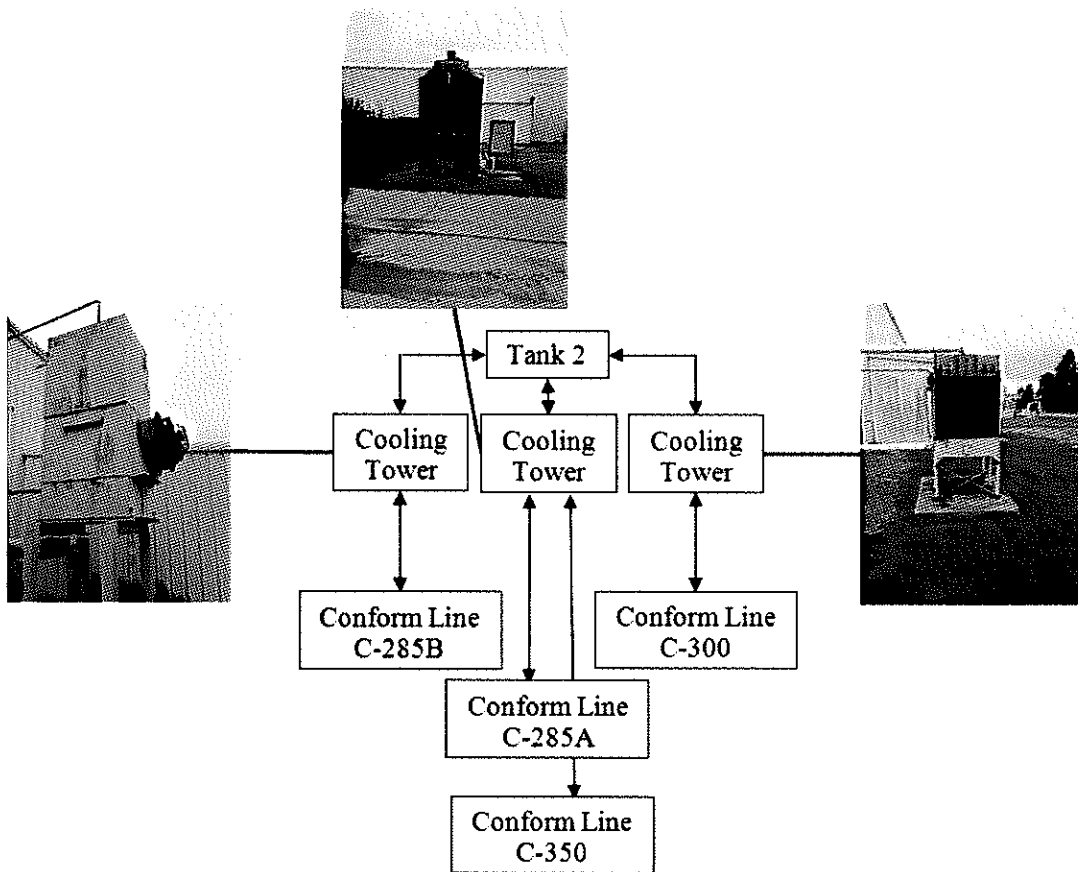
Non-contact cooling water is used in the drawing and milling processes at the facility. The non-contact cooling water is recirculated to the pond. It is possible for the pond to discharge to the City of Osceola Publicly Owned Treatment Works (POTW), but this is typically only necessary when the pond or associated recirculation equipment requires maintenance.



### Copper and Aluminum Conform Processes

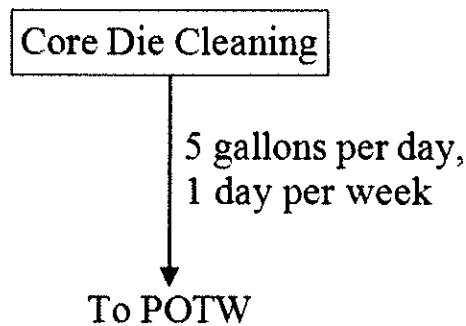
The copper and aluminum conform lines (C-285A, C-285B, C-300, and C-350) generate wastewater, which recirculates between the conform process equipment and three cooling towers as shown below. Each wastewater line can be pumped into Tank 2, which is periodically pumped out by a waste contractor who ships the wastewater offsite. Wastewater from the copper and aluminum conform lines is not discharged to the City of Osceola POTW.

Note that the C-350 line was shut down and the process equipment was removed during the March 1, 2016 – August 31, 2016 monitoring period.



Die Cleaning Process

Dies are periodically soaked in caustic solution for cleaning. When they are done soaking, they are rinsed off using clean tap water over a sink. The rinse water discharges to the City of Osceola POTW. The estimated discharge flow rate is five gallons per die cleaning event, and the estimated frequency of die cleaning events is once per week.



### Other Wastewater Streams

Other wastewater streams that discharge to the City of Osceola POTW include:

- Sanitary waste;
- Air compressor condensate blowdown; and
- Water from the steam clean forklift wash area

August 11, 2016

## ENSAFE - Memphis

Sample Delivery Group: L851319  
Samples Received: 08/05/2016  
Project Number: 0888818277/003  
Description: Osceola, AR

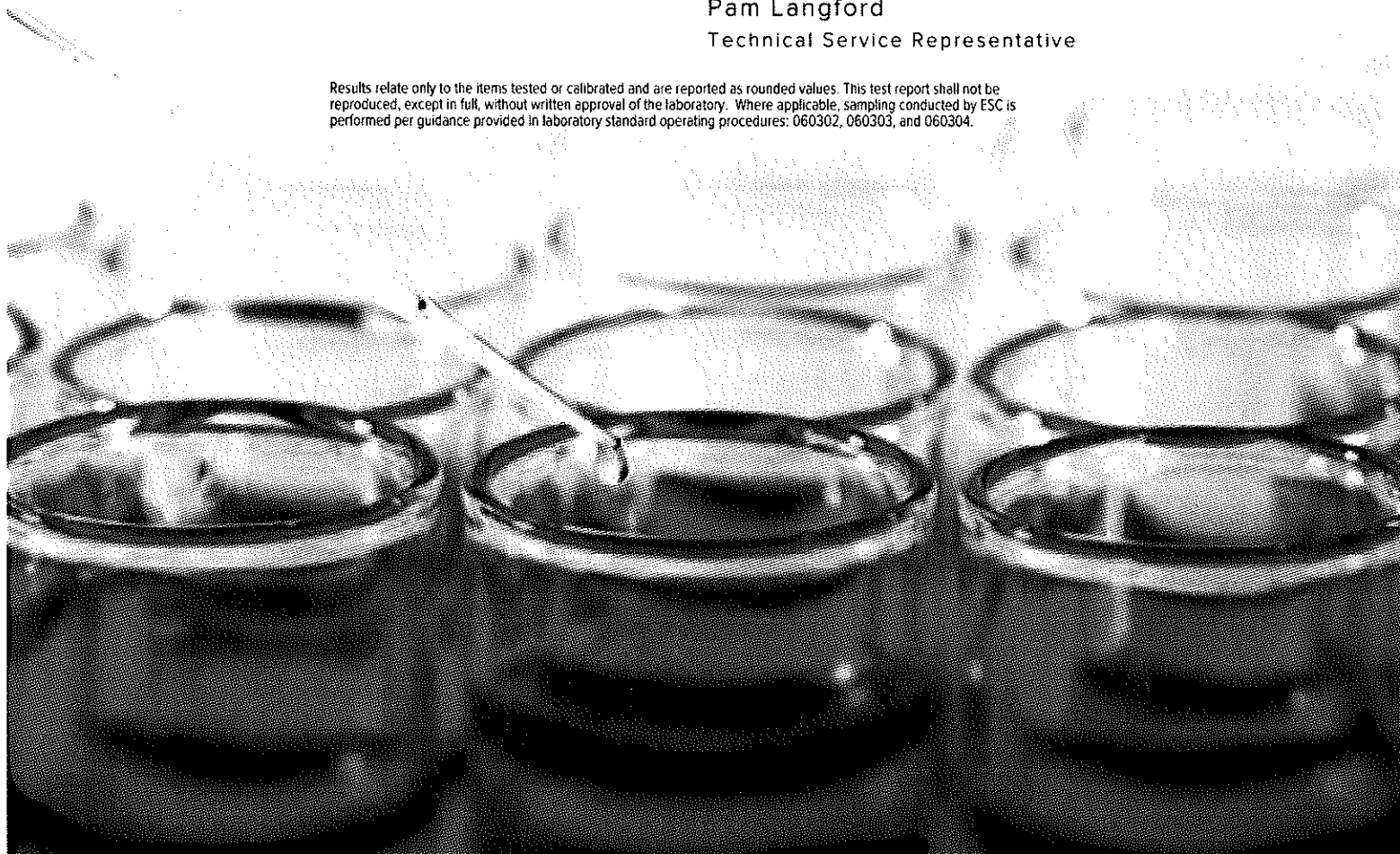
Report To: Eric Tidquist  
5724 Summer Trees Drive  
Memphis, TN 38134

Entire Report Reviewed By:












Pam Langford  
Technical Service Representative

Results relate only to the items tested or calibrated and are reported as rounded values. This test report shall not be reproduced, except in full, without written approval of the laboratory. Where applicable, sampling conducted by ESC is performed per guidance provided in laboratory standard operating procedures: 060302, 060303, and 060304.





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# SAMPLE SUMMARY

ONE LAB. NATIONWIDE.



DCA L851319-01 WW

Collected by  
Eric Tidquist

Collected date/time  
08/04/16 11:07

Received date/time  
08/05/16 09:00

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst
Metals (ICP) by Method 200.7	WG896100	1	08/05/16 17:28	08/05/16 21:35	BRJ
Wet Chemistry by Method 1664A	WG896944	1	08/09/16 07:20	08/09/16 12:19	SHG
Wet Chemistry by Method 3500Cr B-2011	WG896005	1	08/05/16 10:26	08/05/16 10:26	KK
Wet Chemistry by Method 4500CN E-2011	WG896067	1	08/05/16 15:43	08/08/16 11:10	DR







All MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.

Pam Langford  
Technical Service Representative

Sample Handling and Receiving

The following analysis were performed from an unpreserved, insufficiently or inadequately preserved sample.

<u>ESC Sample ID</u>	<u>Project Sample ID</u>	<u>Method</u>
L851319-01	DCA	4500CN E-2011

- Cp
- Tc
- <sup>3</sup>Ss
- Cn
- <sup>5</sup>Sr
- <sup>6</sup>Qc
- <sup>7</sup>Gl
- <sup>8</sup>Al
- <sup>9</sup>Sc



## Wet Chemistry by Method 1664A

Analyte	Result	Qualifier	RDL	Dilution	Analysis	Batch
Oil & Grease (Hexane Extr)	20.9		6.25	1	08/09/2016 12:19	<u>WG896944</u>

## Wet Chemistry by Method 3500Cr B-2011

Analyte	Result	Qualifier	RDL	Dilution	Analysis	Batch
Chromium, Hexavalent	ND		0.0100	1	08/05/2016 10:26	<u>WG896005</u>

## Wet Chemistry by Method 4500CN E-2011

Analyte	Result	Qualifier	RDL	Dilution	Analysis	Batch
Cyanide	ND		0.00500	1	08/08/2016 11:10	<u>WG896067</u>

## Metals (ICP) by Method 200.7

Analyte	Result	Qualifier	RDL	Dilution	Analysis	Batch
Zinc	0.212		0.0500	1	08/05/2016 21:35	<u>WG896100</u>

Cd

Tc

<sup>3</sup> Ss<sup>4</sup> Cn<sup>5</sup> Sr<sup>6</sup> Qc<sup>7</sup> Gl<sup>8</sup> Al<sup>9</sup> Sc

WG896944

Wet Chemistry by Method 1664A

QUALITY CONTROL SUMMARY

L851319-01

ONE LAB. NATIONWIDE.

Method Blank (MB)

(MB) R3155399-1 08/09/16 12:16

Analyte	MB Result	MB Qualifier	MB MDL	MB RDL
Oil & Grease (Hexane Extr)	U	1.16	5.00	

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3155399-2 08/09/16 12:16 • (LCSD) R3155399-3 08/09/16 12:17

Analyte	Spike Amount	LCS Result	LCSD Result	LCS Rec.	LCSD Rec.	Rec. Limits	LCS Qualifier	LCSD Qualifier	RPD	RPD Limits
Oil & Grease (Hexane Extr)	40.0	38.3	38.6	95.8	96.5	78.0-114	0.780	0.780	20	%

L850750-02 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L850750-02 08/09/16 12:17 • (MS) R3155399-4 08/09/16 12:18 • (MSD) R3155399-5 08/09/16 12:18

Analyte	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
Oil & Grease (Hexane Extr)	40.0	40.0	90.8	83.1	127	108	1	78.0-114	J5	8.96	18	%



ACCOUNT:  
ENSAGE - Memphis

PROJECT:  
0888818277003

SDG:  
L851319

DATE/TIME:  
08/11/16 13:01

PAGE:  
6 of 13

# WG896005

Wet Chemistry by Method 3500Cr B-2011

## QUALITY CONTROL SUMMARY

L851319-01

ONE LAB. NATIONWIDE.

### Method Blank (MB)

(MB) R3154768-1 08/05/16 10:12

Analyte	MB Result mg/l	MB Qualifier	MB MDL mg/l	MB RDL mg/l
Chromium, Hexavalent	U		0.00300	0.0100

### L851319-01 Original Sample (OS) • Duplicate (DUP)

(OS) L851319-01 08/05/16 10:26 • (DUP) R3154768-4 08/05/16 10:26

Analyte	Original Result mg/l	DUP Result mg/l	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
Chromium, Hexavalent	ND	ND	1	0.000		20

### Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

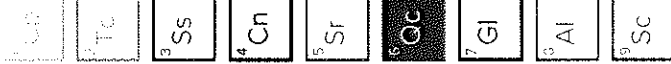
(LCS) R3154768-2 08/05/16 10:13 • (LCSD) R3154768-3 08/05/16 10:13

Analyte	Spike Amount mg/l	LCS Result mg/l	LCSD Result mg/l	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
Chromium, Hexavalent	0.600	0.580	0.594	97.0	99.0	80.0-120		2.00	2.00	20

### L851319-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L851319-01 08/05/16 10:26 • (MS) R3154768-5 08/05/16 10:27 • (MSD) R3154768-6 08/05/16 10:27

Analyte	Spike Amount mg/l	Original Result mg/l	MS Result mg/l	MSD Result mg/l	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Chromium, Hexavalent	0.500	ND	0.478	0.490	96.0	98.0	1	85.0-115	2.00	2.00		20



WG896067

Wet Chemistry by Method 4500CN E-2011

QUALITY CONTROL SUMMARY

L851319-01

ONE LAB. NATIONWIDE.

Method Blank (MB)

(MB) R3155154-1 08/08/16 11:04

Analyte	MB Result	MB Qualifier	MB MDL	MB RDL
Cyanide	U	0.00180	0.00500	

L851319-01 Original Sample (OS) • Duplicate (DUP)

(OS) L851319-01 08/08/16 11:10 • (DUP) R3155154-4 08/08/16 11:11

Analyte	Original Result	DUP Result	Dilution	DUP RPD	DUP RPD Limits
Cyanide	ND	ND	1	0.000	20

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3155154-2 08/08/16 11:05 • (LCSD) R3155154-3 08/08/16 11:06

Analyte	Spike Amount	LCS Result	LCSD Result	LCS Rec.	LCSD Rec.	Rec. Limits	LCS Qualifier	LCSD Qualifier	RPD	RPD Limits
Cyanide	0.100	0.109	0.106	109	106	90.0-110	3.00		3.00	20

L851380-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L851380-01 08/08/16 11:12 • (MS) R3155154-5 08/08/16 11:13 • (MSD) R3155154-6 08/08/16 11:16

Analyte	Spike Amount	Original Result	MS Result	MSD Result	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
Cyanide	0.200	ND	0.207	0.209	1	90.0-110	1.00		1.00	20

Ca, Tc, Ss, Cn, Sr, Qc, Gl, Al, Sc

# WG8996100

Metals (ICP) by Method 200.7

## QUALITY CONTROL SUMMARY

L851319-01

ONE LAB, NATIONWIDE.

### Method Blank (MB)

(MB) R3154978-1 08/05/16 21:15

Analyte	MB Result	MB Qualifier	MB MDL	MB RDL
Zinc	mg/l	mg/l	mg/l	mg/l
	U	0.0034	0.0500	

### Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3154978-2 08/05/16 21:18 • (LCSD) R3154978-3 08/05/16 21:21

Analyte	Spike Amount	LCS Result	LCSD Result	LCS Rec.	LCSD Rec.	Rec. Limits	LCS Qualifier	LCSD Qualifier	RPD	RPD Limits
Zinc	mg/l	mg/l	mg/l	%	%	%	%	%	%	%
	1.00	0.986	0.981	99	98	85-115	0	0	0	20

### L851324-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L851324-01 08/05/16 21:24 • (MS) R3154978-5 08/05/16 21:29 • (MSD) R3154978-6 08/05/16 21:32

Analyte	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
Zinc	mg/l	mg/l	mg/l	mg/l	%	%		%	%	%	%	%
	1.00	ND	1.00	0.967	100	97	1	70-130	4	4	4	20

### L851398-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L851398-01 08/05/16 22:09 • (MS) R3154978-7 08/05/16 22:12 • (MSD) R3154978-8 08/05/16 22:14

Analyte	Spike Amount	Original Result	MS Result	MSD Result	MS Rec.	MSD Rec.	Dilution	Rec. Limits	MS Qualifier	MSD Qualifier	RPD	RPD Limits
Zinc	mg/l	mg/l	mg/l	mg/l	%	%		%	%	%	%	%
	1.00	0.802	1.75	1.91	95	110	1	70-130	9	9	9	20

Co	Tc	Ss	Cn	Sr	Qc	Gl	Al	Sc
----	----	----	----	----	----	----	----	----



## Abbreviations and Definitions

SDG	Sample Delivery Group.
MDL	Method Detection Limit.
RDL	Reported Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
U	Not detected at the Reporting Limit (or MDL where applicable).
RPD	Relative Percent Difference.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Rec.	Recovery.

Qualifier	Description
J5	The sample matrix interfered with the ability to make any accurate determination; spike value is high.

<sup>7</sup> Cp

<sup>7</sup> Tc

<sup>5</sup> Ss

<sup>4</sup> Cn

<sup>5</sup> Sr

<sup>5</sup> Qc

**Gl**

<sup>5</sup> Al

<sup>5</sup> Sc

# ACCREDITATIONS & LOCATIONS

ONE LAB. NATIONWIDE.



ESC Lab Sciences is the only environmental laboratory accredited/certified to support your work nationwide from one location. One phone call, one point of contact, one laboratory. No other lab is as accessible or prepared to handle your needs throughout the country. Our capacity and capability from our single location laboratory is comparable to the collective totals of the network laboratories in our industry. The most significant benefit to our "one location" design is the design of our laboratory campus. The model is conducive to accelerated productivity, decreasing turn-around time, and preventing cross contamination, thus protecting sample integrity. Our focus on premium quality and prompt service allows us to be **YOUR LAB OF CHOICE**.  
 \* Not all certifications held by the laboratory are applicable to the results reported in the attached report.

## State Accreditations

Alabama	40660	Nevada	TN-03-2002-34
Alaska	UST-080	New Hampshire	2975
Arizona	AZ0612	New Jersey--NELAP	TN002
Arkansas	88-0469	New Mexico	TN00003
California	01157CA	New York	11742
Colorado	TN00003	North Carolina	Env375
Connecticut	PH-0197	North Carolina <sup>1</sup>	DW21704
Florida	E87487	North Carolina <sup>2</sup>	41
Georgia	NELAP	North Dakota	R-140
Georgia <sup>1</sup>	923	Ohio--VAP	CL0069
Idaho	TN00003	Oklahoma	9915
Illinois	200008	Oregon	TN200002
Indiana	C-TN-01	Pennsylvania	68-02979
Iowa	364	Rhode Island	221
Kansas	E-10277	South Carolina	84004
Kentucky <sup>1</sup>	90010	South Dakota	n/a
Kentucky <sup>2</sup>	16	Tennessee <sup>14</sup>	2006
Louisiana	A130792	Texas	T 104704245-07-TX
Maine	TN0002	Texas <sup>5</sup>	LAB0152
Maryland	324	Utah	6157585858
Massachusetts	M-TN003	Vermont	VT2006
Michigan	9958	Virginia	109
Minnesota	047-999-395	Washington	C1915
Mississippi	TN00003	West Virginia	233
Missouri	340	Wisconsin	9980939910
Montana	CERT0086	Wyoming	A2LA
Nebraska	NE-OS-15-05		

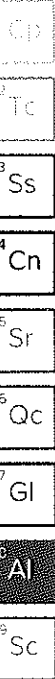
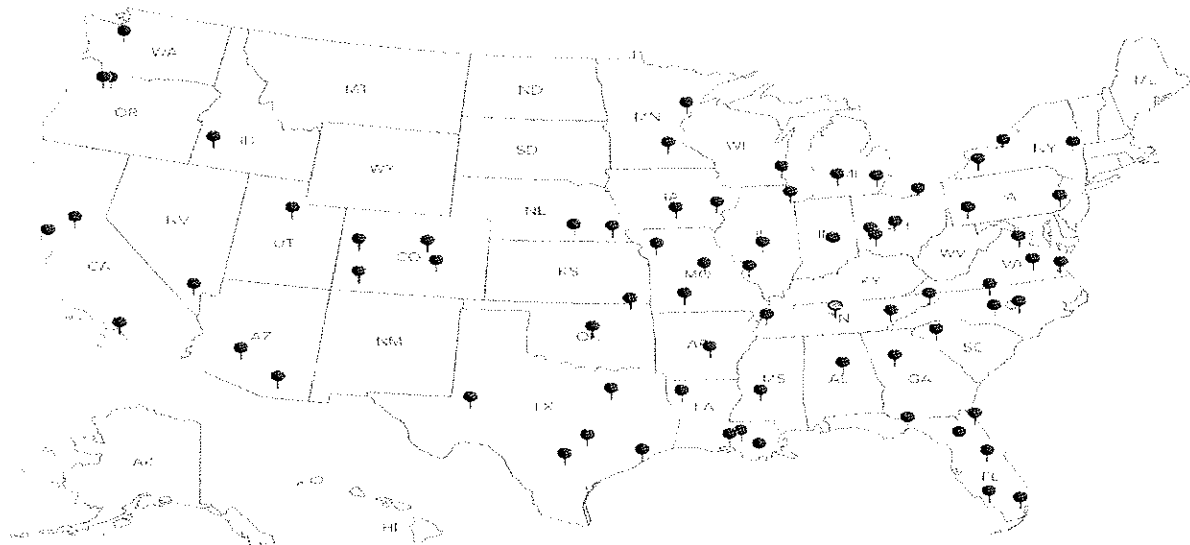
## Third Party & Federal Accreditations

A2LA - ISO 17025	1461.01	AIHA	100789
A2LA - ISO 17025 <sup>5</sup>	1461.02	DOD	1461.01
Canada	1461.01	USDA	S-67674
EPA-Crypto	TN00003		

<sup>1</sup> Drinking Water <sup>2</sup> Underground Storage Tanks <sup>3</sup> Aquatic Toxicity <sup>4</sup> Chemical/Microbiological <sup>5</sup> Mold <sup>14</sup> Accreditation not applicable

## Our Locations

ESC Lab Sciences has sixty-four client support centers that provide sample pickup and/or the delivery of sampling supplies. If you would like assistance from one of our support offices, please contact our main office. **ESC Lab Sciences performs all testing at our central laboratory.**







12065 Lebanon Rd  
 Mount Juliet, TN 37122  
 Phone: 615-758-5858  
 Phone: 800-767-5859  
 Fax: 615-758-5859

Lab # **1851319**  
**D087**

Account: **ENSAFE**  
 Template: **T114354**  
 Prelogin: **P562224**  
 TSR: **633 - Pam Langford**  
 PB: **7-28-16**  
 Shipped Via: **FedEX Ground**

Rem./Contaminant	Sample # (lab only)
	-01

Analysis / Container / Preservative

OGHEX 1L-Ch-Add HCl	1									
Cu, Ni, Pb, Zn 200.7250mlHDPE-HNO3	1									
CR6 250mlHDPE-NOPres	1									
702 CN 250mlHDPEAMB-NAOH	1									

Billing Information:  
**Attn: Buyer**  
 5724 Summer Trees Drive  
 Memphis, TN 38134

Email To: **gpp@ensafe.com**  
 etidivist@ensafe.com  
 City/State Collected: **Osceola, AR**  
 Lab Project # **ENSAFE-OSCEOLA**  
 P.O. #

Date Results Needed  
 Email?  No  Yes  
 FAX?  No  Yes  
 Date: **8/4/16** Time: **11:07**  
 No. of Cntrs: **4**

**ENSAFE - Memphis**  
 5724 Summer Trees Drive  
 Memphis, TN 38134

Report to: **Eric Tidavist**  
**Geoff Pope** Eric Tidavist  
 Email To: **gpp@ensafe.com**  
 etidivist@ensafe.com

Project Description: **Osceola, AR**  
 Client Project # **088818277/003**  
 Site/Facility ID #

Sample ID **DCA**  
 Comp/Grab **G**  
 Matrix **WW**  
 Depth **N/A**  
 Date **8/4/16** Time **11:07**

Rush? (Lab MUST Be Notified)  
 Same Day .....200%  
 Next Day .....100%  
 Two Day .....50%  
 Three Day .....25%

Collected by (print): **Eric Tidavist**  
 Collected by (signature): *Eric Tidavist*  
 Immediately Packed on Ice  Y  N

Relinquished by: (Signature) *Eric Tidavist*  
 Date: **8/4/16** Time: **14:30**

Relinquished by: (Signature) *[Signature]*  
 Date: \_\_\_\_\_ Time: \_\_\_\_\_

Relinquished by: (Signature) *[Signature]*  
 Date: \_\_\_\_\_ Time: \_\_\_\_\_

Matrix: **SS - Soil GW - Groundwater WW - Waste/Water DW - Drinking Water OT - Other**

Hold # **090347523705**

pH \_\_\_\_\_ Temp \_\_\_\_\_

Flow \_\_\_\_\_ Other \_\_\_\_\_

Condition: (lab use only) **OK**

Samples returned via:  UPS  FedEx  Courier

Temp: **2.6** °C Bottles Received: **2**

Date: **8-5-16** Time: **11:07**

COC Seal Intact:  Y  N  NA

PH Checked: **22,712** NGF:

Received by: (Signature) *[Signature]* Time: \_\_\_\_\_

Received by: (Signature) *[Signature]* Time: \_\_\_\_\_

Received for: (Signature) *[Signature]* Time: \_\_\_\_\_

Remarks: **CR6 (hexavalent chromium) has a 24 hour hold time.**



YOUR LAB OF CHOICE

# Cooler Receipt Checklist

Client: ENSAFE SDG# 1851319

Cooler Received/Opened On: 8-5-2016 By: Michael Witherspoon

Temperature Upon Receipt: 36 °C *MW* (Signature)

Cooler Receipt Check List	Yes	No	N/A
Were custody seals on outside of cooler and intact?	/		
Were custody papers properly filled out (ink, signed, etc.)?	/		
Did all bottles arrive in good condition?	/		
Were correct bottles used for the analyses requested?	/		
Was sufficient amount of sample sent in each bottle?	/		
Were correct preservatives used?	/		
Were all applicable sample containers checked for preservation? (Any samples not in accepted pH range noted on COC.)	/		
If applicable, was an observable VOA headspace present?			/
Non Conformance Generated? (If yes see attached NCF)			

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

ATTN: Water Div/NPDES Pretreatment

**(1) IDENTIFYING INFORMATION**

<p>A. LEGAL NAME &amp; MAILING ADDRESS</p> <p align="center">Rea – Algonquin Industries Division 1800 Highway 61 South Osceola, AR 72370</p>	<p>B. FACILITY &amp; LOCATION ADDRESS</p> <p align="center">Rea – Algonquin Industries Division 1800 Highway 61 South Osceola, AR 72370</p>
--	---

C. FACILITY CONTACT: John Rausch (jrausch@reawire.com)      TELEPHONE NUMBER: 870-622-4413

**(2) REPORTING PERIOD—FISCAL YEAR**      2016

<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p align="center">September &amp; March</p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p align="center">FROM: March 1, 2016 – August 31, 2016</p>
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**(3) DESCRIPTION OF OPERATION**

<p>A. Regulated Processes per 40 CFR Part 467 (Aluminum) Subpart A &amp; 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> <b>Extruded Aluminum</b>                      (§467.35 Core Die Cleaning)                 </td> <td align="center">1,461,705</td> <td align="center">3/1/2016-8/31/2016 184 days</td> </tr> </tbody> </table>	PROCESS	PRODUCTION-OFF/LB	PRODUCTION DAYS	<b>Extruded Aluminum</b> (§467.35 Core Die Cleaning)	1,461,705	3/1/2016-8/31/2016 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					
<b>Extruded Aluminum</b> (§467.35 Core Die Cleaning)	1,461,705	3/1/2016-8/31/2016 184 days					

C. Number of Regular Employees at this Facility: 32      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
<b>Process:</b>				
§467.35 Core-Die Cleaner (Aluminum Extrusion)	5 (estimate)	26 (estimate)	Estimated discharge rate of 5 gallons per die cleaning event and estimated frequency of one die cleaning event per week	Intermittent
<b>§403.6(e) Unregulated:</b>				
Air compressor condensate blowdown	10 (estimate)	144	NA	Intermittent
Steam clean forklift wash area	5 (estimate)	144	NA	Intermittent
<b>§403.6(e) Dilute:</b>				
Sanitary	6,000 (estimate)	144	NA	Continuous

\*The batch discharges are 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**

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	
Die Cleaning Allowable Concentrations <sup>1</sup>	31	12.8	NA	NA	NA	103	44.1	NA	3779	1847	21	8.4
Die Cleaning Measured Concentrations	<0.01		NA	NA	NA	0.212		NA	20.9		<0.005	

40CFR136 Preservation and Analytical Methods Use:  Yes  No

**(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 \_\_\_\_\_

<sup>1</sup> Listed as daily maximum and monthly average respectively

**(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(I)]**

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

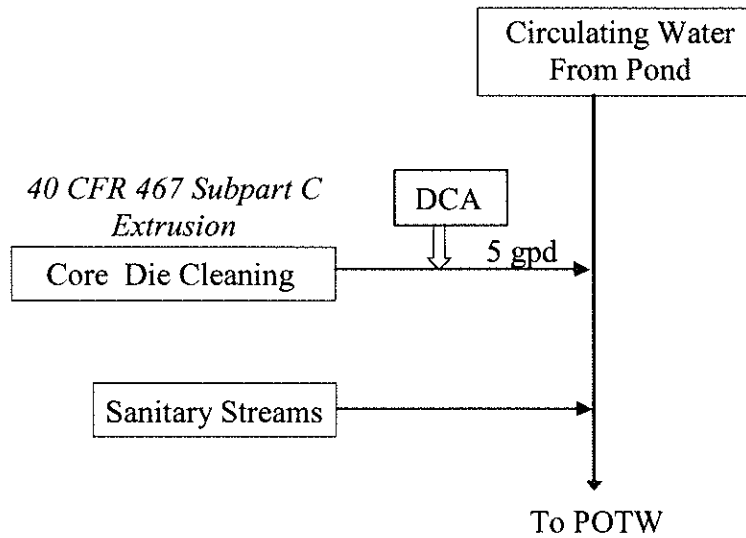
PLANT MANGER  
OFFICIAL TITLE

  
SIGNATURE  
9-16-16  
DATE SIGNED

**ATTACHMENT 1**

**Flow Schematics**

Algonquin Industries Osceola, Arkansas September 2016



Sampling Points => ↓

§403.6(e) Nonregulated Streams  
Not Present

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 penal ties 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 (September 2016)

**ATTACHMENT 2**

**Sampling and Analysis Results**



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

<b>To calculate concentrations:</b>	
Die Cleaning Flow Rate, gp	5
<b>To calculate cumulative limit:</b>	
Beginning date of period of semiannual report	2/29/2016
End date of period of semiannual report	8/31/2016
Date Sample taken:	8/4/2016
Days from beginning of semi annual report through sample date	157

Summary of Calculated Equivalent Concentration Limits for Caustic Soda Rinse of Extrusion Die Discharge, mg/L		
Parameter	Daily Maximum	Monthly Average
Chromium	31	12.8
Cyanide	21	8.4
Zinc	103	44.1
TTOal *	NA	NA
Oil and Grease	3779	1847.5

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

extruded aluminum off lb = production + 10% scrap =				
production x				110%
2016	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-16	31	243,618	267,979	8,644
Apr-16	30	243,618	267,979	8,933
May-16	31	243,618	267,979	8,644
Jun-16	30	243,618	267,979	8,933
Jul-16	31	243,618	267,979	8,644
Aug-16	4	243,618	34,578	8,644
Sep-16	NA	0	NA	NA
Oct-16	NA	0	NA	NA
Nov-16	NA	0	NA	NA
Dec-16	NA	0	NA	NA
Jan-17	NA	0	NA	NA
Feb-17	NA	0	NA	NA
<b>Totals</b>	<b>157</b>	<b>1,461,705</b>	<b>1,374,474</b>	<b>8,755</b>

## Calculations for Equivalent Concentration Limits for REA /Algonquin Industries Division for Wastewater that Directly Discharges to the POTW (Die Cleaning and Cooling Tank Water)

Process Wastestream	Regulation	Total Production Since Last Tank Dump (off-lb/day)	Flow Rate Used to Calculate Conc. gallons/day	Effluent Guidelines, Mass and Concentration Calculations									
				Chromium		Cyanide		Zinc		TTO		Oil and Grease	
				Daily	Monthly	Daily	Monthly	Daily	Monthly	Daily	Monthly	Daily	Monthly
<b>Caustic Soda Rinse of Extrusion Dies</b>	Aluminum Forming 40 CFR 467.35 Subpart C Extrusion Subcategory Core	8,755	5	Chromium		Cyanide		Zinc		TTO		Oil and Grease	
Effluent Guideline, (lb/million off lb)				0.150	0.061	0.098	0.040	0.490	0.210	0.230	---	18	8.8
Calculated Mass Limit, based on production, (lb/day)				0.0013	0.001	0.001	0.000	0.004	0.002	0.002	---	0.16	0.08
Calculated Equivalent Concentration Limit, based on flow rate (mg/L)				<b>31.49</b>	<b>12.81</b>	<b>20.57</b>	<b>8.40</b>	<b>102.87</b>	<b>44.09</b>	48.29	---	<b>3779</b>	<b>1847</b>
Sampling Results from: 08/04/16				<b>0.01</b>	<b>0.01</b>	<b>0.005</b>	<b>0.005</b>	<b>0.212</b>	<b>0.212</b>	---	---	<b>21</b>	<b>21</b>
Available Allowance, as a percentage				<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	<b>100%</b>	---	---	99%	<b>99%</b>