

SEMI-ANNUAL REPORT CON'D FACILITY NAME: Saint Jean Industries-Heber Springs AR

(4) FLOW MEASUREMENT (CON'D)

B. INDIVIDUAL PROCESS WASTESTREAMS DISCHARGED TO POTW

Operation	Ave Tot Flow ¹	Gals & Number ²	Type of Discharge	No. Disc Days
§467.46 Core-Misc. WS	NA			*****
§467.46 Sol Heat Trt.	568	*****	Continuous	181
§467.46 C/E Bath	N/A			
§467.46 C/E Rinse	N/A			
Total Regulated	568			181
§403.6(e) Unregulated ³	NA			
§403.6(e) Dilute	NA			
Non-Contact Cool. Water	1905	*****	Continuous	181
Sanitary	7,000	*****	Continuous	181
Total Flow to POTW	9,473	*****	*****	*****

¹ "Ave Tot Flow" is the "total gallons discharged divided by the number of discharge days" during the reporting period. Note that "Ave Tot Flow" times "No. Disc Days" must equal the actual total gallons discharged to the POTW for this six month period.

² List the total gallons in each batch and the number of times the batch was released to the POTW; e.g., 300 gal/batch & 4 times.

³ "Unregulated" has a precise legal meaning; see 40CFR403.6(e).

(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.

Conc. (Mg/l)	Cr		CN-NA			Zn			TTO-NA			O&G		
	SHT		SHT			SHT			SHT			SHT	Bath	Rinse
Max Allow. Conc.	6.07					16.6						162.6		
Ave Allow Conc	2.47					6.86						162.6		
Max Measured Conc.	<.007					.002						<5		
Ave Measured Conc.	<.007					.002						<5		

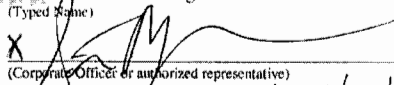
40CFR136 Preservation and Analytical Methods Use: Yes No

(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 467.46) categorical pretreatment standards since analyzing the first wastewater sample in January, February, March, April or May of this calendar year; and that the results of the first analysis contained less than 0.07 mg/l cyanide.

Mark Lee - Plant Manager
(Typed Name)

X 
(Corporate Officer or authorized representative)

Date of Signature 5/18/11

Steve Ryan -
Plant
Controller

B. CHECK ONE: REQUIRED TOXIC ORGANIC ANAL ATT'D O & G ANAL ATTACHED

In accordance with §467.03(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 _____)

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 _____, 20__.

Notary Public in and for _____
County, Arkansas

My commission expires _____.

SEMI-ANNUAL REPORT CON'D FACILITY NAME: Saint Jean Industries-Heber Springs AR

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]

86602 [42 U.S.C. 13101] Findings and Policy para (b) Policy--The Congress hereby declares it 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:

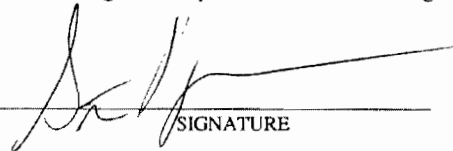
(8) GENERAL COMMENTS

(9) SIGNATORY REQUIREMENTS [40CFR403.12(1)]

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.

Mark Lee
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

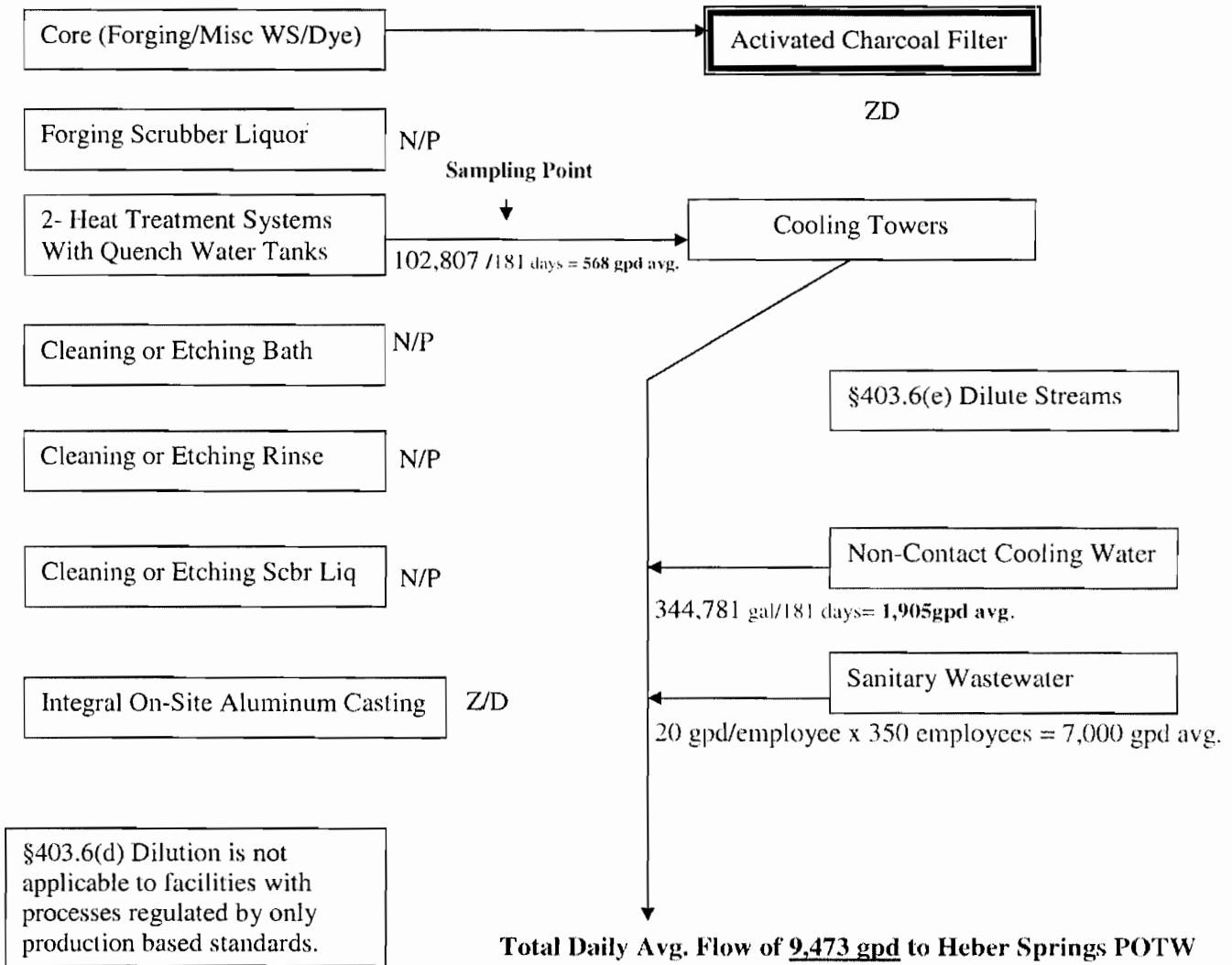
Steve Ryan - Plant Controller

X 
SIGNATURE

Plant Manager
OFFICIAL TITLE

DATE SIGNED

Saint Jean Industries, Heber Springs, AR
AFIN: 12-00058 Permit #: ARP001050
 40 CFR 467.46 Subpart D Forging Sub-category
 Reporting Period: 11/1/2010 to 5/31/2011



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]
 Signature of §403.12(b) Professional

5/16/11
 Date

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(d) official
 Plant Controller

5/18/11
 Date

COOLING WATER DISCHARGE LOG

November 2010 thru April 2011

QUENCH			CASTING		
11/5/2010 Reading: 4,948,543			Reading: 6,642,747		
Nov	Discharge	26,103	Nov	51,637	
12/06/10 Reading: 4,974,645			Reading: 6,694,384		
Dec	Discharge	21,635	Dec	45,462	
01/05/11 Reading: 4,996,280			Reading: 6,739,846		
Jan	Discharge	13,479	Jan	45,465	
2/3/2011 Reading: 5,009,759			Reading: 6,785,311		
Feb	Discharge	25,824	Feb	54,545	
3/7/2011 Reading: 5,035,583			Reading: 6,839,856		
March	Discharge	10,647	March	61,380	
4/8/2011 Reading: 5,046,230			Reading: 6,901,236		
April	Discharge	5,120	April	86,293	
5/4/2011 Reading: 5,051,350			Reading: 6,987,528		
Six Month Total Discharge - Quench			102,807	Casting	344,781
Days: 181					
6 Month Average			17,134	57,464	
Daily Average=			568	1905	
High Month=			Nov - 26,103	April - 86,293	



	Maximum for any 1 day	Maximum for Monthly Average	Daily	Monthly Avg	Conversion Factor (8.34) to mg/l	Conversion Factor (8.34) to mg/l
					Maximum Daily	Max Monthly Avg
Chromium	0.76	0.31	0.029	0.01172	6.07	2.474
Zinc	2.08	0.86	0.079	0.03251	16.60	5.86
Oil & Grease	20.37	20.37	0.770	0.77008	162.56	162.56

Production lbs 6,842,675 off/lbs
Heat Treat 6,842,675
Water Discharge 568 Avg.gal per day
Days in Period 181

millions 6.842675
mil-lbs/day 568



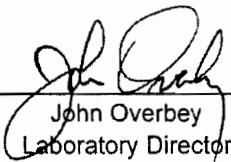


Saint Jean Industries
ATTN: Mr. Greg Cothren
Cast/Forged Products
424 Industrial Park Road
Heber Springs, AR 72543

This report contains the analytical results and supporting information for the sample submitted on March 29, 2011. 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.


By SB
John Overbey
Laboratory Director

Saint Jean Industries
Cast/Forged Products
424 Industrial Park Road
Heber Springs, AR 72543

SAMPLE INFORMATION

Project Description:

One (1) water sample(s) received on March 29, 2011
Semi-Annual Waste Water
P.O. No. HS-PO000005518

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>
146413-1	#1 3/28/11 9:30am,9:31am	28-Mar-2011 0931	

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", 20th edition, 1998.
"American Society for Testing and Materials" (ASTM).
"Association of Analytical Chemists" (AOAC).

Saint Jean Industries
Cast/Forged Products
424 Industrial Park Road
Heber Springs, AR 72543

ANALYTICAL RESULTS

AIC No. 146413-1

Sample Identification: #1 3/28/11 9:30am,9:31am

<u>Analyte</u>		<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Chromium		0.017	0.007	mg/l	
EPA 200.7	Prep: 29-Mar-2011 1414 by 271	Analyzed: 29-Mar-2011 1758 by 235		Batch: S29781	
Zinc		0.20	0.002	mg/l	
EPA 200.7	Prep: 29-Mar-2011 1414 by 271	Analyzed: 29-Mar-2011 1758 by 235		Batch: S29781	
Oil and Grease		< 5	5	mg/l	
EPA 1664A	Prep: 29-Mar-2011 1352 by 100	Analyzed: 29-Mar-2011 1548 by 100		Batch: B6825	

Saint Jean Industries
Cast/Forged Products
424 Industrial Park Road
Heber Springs, AR 72543

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Chromium	0.5 mg/l	102	85.0-115			S29781	29Mar11 1414 by 271	29Mar11 1737 by 235		
Zinc	0.5 mg/l	101	85.0-115			S29781	29Mar11 1414 by 271	29Mar11 1737 by 235		
Oil and Grease	40 mg/l	97.0	78.0-114			B6825	29Mar11 1352 by 100	29Mar11 1548 by 100		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Chromium	146417-1	0.5 mg/l	90.5	75.0-125	S29781	29Mar11 1414 by 271	29Mar11 1740 by 235		
	146417-1	0.5 mg/l	90.5	75.0-125	S29781	29Mar11 1414 by 271	29Mar11 1743 by 235		
	Relative Percent Difference:		0.00952	20.0		S29781			
Zinc	146417-1	0.5 mg/l	81.9	75.0-125	S29781	29Mar11 1414 by 271	29Mar11 1740 by 235		
	146417-1	0.5 mg/l	82.4	75.0-125	S29781	29Mar11 1414 by 271	29Mar11 1743 by 235		
	Relative Percent Difference:		0.157	20.0		S29781			

LABORATORY BLANK RESULTS

Analyte	Result	RL	PQL	QC			Preparation Date	Analysis Date	Qual
				Sample	Preparation Date	Analysis Date			
Chromium	< 0.007 mg/l	0.007	0.007	S29781-1	29Mar11 1414 by 271	29Mar11 1734 by 235			
Zinc	< 0.002 mg/l	0.002	0.002	S29781-1	29Mar11 1414 by 271	29Mar11 1734 by 235			
Oil and Grease	< 5 mg/l	5	5	B6825-1	29Mar11 1352 by 100	29Mar11 1548 by 100			

Gilliam, Allen

Sent: Monday, May 23, 2011 2:50 PM
To: greg.cothren@st-ji.com
Cc: Fuller, Kim
Subject: AR0022381_Saint Jean (ARP001050) May 2011 Semi-Annual Pretreatment Report Response_201105023

Greg,

Your May 2011 Semi-Annual Pretreatment report was received electronically on 5/18/11 and reviewed. This office cannot deem it complete nor compliant with the Aluminum Forming Category in 40 CFR 467.

Your production based Cr, Zn equivalent limits and O&G alternative limits are compliant upon reviewing your reported production and flows during the six-month reporting period.

However, pertaining to further requirements in **40 CFR 467.03**, "Monitoring and reporting requirements. The following special monitoring and reporting requirements apply to all facilities controlled by this regulation.

(a) Periodic analyses for cyanide as may be required under part 122 or 403 of this chapter are not required when **both** of the following conditions are met:

- (1) The first wastewater sample of each calendar year has been analyzed and found to contain less than **0.07 mg/l** cyanide.
- (2) The owner or operator of the aluminum forming plant certifies in writing to the POTW authority or permit issuing authority that cyanide is not and will not be used in the aluminum forming process."

This requirement is also included in the small print at the top of page 3 of your semi-annual report under "(6) CERTIFICATION". That language could have been made clearer.

The first requirement has been overlooked since 5/22/06 (the oldest semi-annual report in your file) with Saint Jean only making the certification statement in (2) above since. Saint Jean must submit a CN analysis at least once per year to be compliant with the federal Aluminum Forming Pretreatment Standards.

Please submit a CN analysis of your regulated wastewater within thirty (30) days of the date of this e-mail transmission as an addendum to your May 2011 Semi-Annual Report.

Apologies this oversight,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

*3/17/11
K.
I have never looked
into this anything
in 403 and...
...
...
...
...
...
...*