ADEQ

ARKANSAS
Department of Environmental Quality

November 30, 2009

Greg Cothren
Environmental, Safety and Health Coordinator
Saint Jean Industries, Inc.
424 Industrial Park Road
Heber Springs, AR 72543

Re: Saint Jean Industries (Tracking #ARP001050, AFIN #1200058) Pretreatment Compliance Assurance Visit in Heber Springs (NPDES #AR0022381)

Dear Mr. Cothren,

On 11/3/09, a compliance assurance visit (CAV) was conducted by ADEQ Pretreatment personnel at your facility. This to satisfy requirements of the memorandum of agreement with EPA Region VI in our State's Pretreatment Program implementation procedures to "Randomly sample and analyze the effluent from industrial users and to conduct surveillance activities in order to identify, independent of information supplied by industrial users occasional and continuing noncompliance with pretreatment standards" per 40 CFR 403.8(f)(2)(v).

This office wishes to extend its appreciation to you and your staff for the transparent exchange of information and dialogue during the visit. Your willingness to "open the books" and share process knowledge compliments the true spirit of environmental partnerships.

Saint Jean is compliant with the Aluminum Forming standards in 40 CFR 467.46 and the National Pretreatment Regulations in 40 CFR 403. Attachments A-1 and A-2 confirm concentrations analyzed from samples taken during the site visit are well within the 40 CFR 467.46 limitations.

Find attached supporting documentation: the "Pretreatment Industrial Inspection" and ADEQ's Certificate of Analysis for all metals and oil and grease analyzed by our lab (Attachments A-1 and A-2).

If there are further questions or comments, please feel free to contact this office at (501) 682-0625 or electronically at gilliam@adeq.state.ar.us .

Sincerely,

Allen R. Gilliam

Allen R. Gilliam
ADEQ State Pretreatment Coordinator

cc: Pretreatment File
Don Knight, City Wastewater General Manager, 1108 West Front Street, Heber Springs, 72543

Attachments

Pretreatment Compliance Inspection
Facility Information

Facility Name: Saint Jean Industries, Inc.	Site Address: 424 Industrial Park Road Heber Springs 72543
Signatory Authority (Name & Title): Yves Mayet – Plant Manager	
Phone: 501.362.9532	Mailing Address (if different):
Fax: 501.362.9590	
Address: 424 Industrial Park Road	Corporate Owner Name and address (if applicable):
Heber Springs 72543	
Contact Person (Name & Title): Greg Cothren – Env./Safety and Health Coordinator	Phone:
Phone: 501.362.9590	Fax:
Fax:	Corporate CEO:
e-mail: greg.cothren@st-ji.com	e-mail:
Facility Tracking #ARP001050; AFIN #1200058	**Last Inspection Date: 3/22/06**
POTW (City) IU discharges to: Heber Springs (NPDES #AR0022381)	
Industrial Classification: ☒ Categorical	☐ Significant
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 467.46 (new source)	

Table of Contents

Comments :

Inspector's Name (Print): Allen Gilliam	Signature: Allen Gilliam
IU Rep's Name (Print) Greg Cothren	Signature: Greg Cothren
Date and Time Inspection Ended: 11/3/09 @ 2:30 pm	

I. Summary of Inspection

A. Inspection and Objective (Complete Before Inspection)

☐ Permit Renewal	☒ Bi-Annual	☐ Spill/Slug	☐ Unscheduled
☐ New Construction	☐ Noncompliance	☐ Follow-up	☐ Complaint

Inspection Objective(s): Verify compliance with sampling, records review and facility walk-through.

Checklist of items to be reviewed and/or visually inspected:

☒ Pre-inspection Meeting	☐ Permit Conditions	☐ Safety Concerns
☒ Process Inspection	☐ Pretreatment Process	☐ TOMP
☒ Chemical Storage	☒ Discharge point(s)	☒ Spills/Slug Control Plan
☐ Records Review	☐ RCRA information	☒ Process/Flow/Pretreatment Schematics
☒ IU sampling procedures	☐ Flow/pH Meter(s)	☐ Calibration Records
☒ MSDS Inventory List	☐ New MSDS	☐

Comments:

B. Inspection Analysis

Were there any deficiencies/violations identified and noted during the inspection? ☐ Yes ☒ No

Provide a brief narrative of deficiencies/violations or other concerns in the following areas:

Records Review: Chain of Custody procedures could be improved.

Process Area(s): Adequate, no comment.

Pretreatment System: N/A

Self Monitoring Procedures: Under current piping situation, their quench tank appears to be the most adequate point to obtain representative samples. Manually and awkward, sampling can carefully be conducted.

Spill/~~Slug~~ Control Plan: Adequate, no comment.

Sampling Point: See above.

Chemical Storage: Adequate, no comment.

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 11/3/09 @ 9:35 a.m.	SIC code(s): 3714
IU Reps/Titles: Greg Cothren – Environmental / Safety and Health Coordinator	Control Authority Reps/Titles: Allen Gilliam / State Pretreatment Coordinator
End product(s): Auto suspension components	Approx. # of units produced: not determined
Days of Operation: 7	Days of Production (if different):
Hours of Operation: 24	Hours of Production (if different):
Shift 1, hrs.: 6:30a.m. to 2:45 p.m.	Shift 2, hrs.: 2:30 p.m. to 10:45 p.m. / Shift 3, hrs.: 10:30 p.m. to 6:45 a.m.
# of Employees: ~200	Peak Mos.: N/A / "Off" Mos.: N/A

Are there any scheduled plant shutdowns? Yes ☒ & No ☒ N/A ☐ If yes, when? "Maybe Thanksgiving & Christmas"

Are there designated plant clean-up days? Yes ☐ No ☒ N/A ☐ If yes, when?

Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes ☒ **No** ☐

~~**If No,**~~ explain: Prior to site visit, no process schematics or narrative could be located in facility's file. But, during the site visit, the facility rep supplied a fairly general one which helped explain wastewater source and flow.

Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes ☒ No ☐

If Yes, explain: One has to sign in, obtain a visitor's badge and proceed only with an escort. Sampling point is near their heat treat oven and has chain restraints to keep employees away from hot surfaces.

Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: ☒ Yes. ☐ No

If Yes, explain: Safety glasses and ear protection at a minimum, steel toed boots and hard hats if in casting/forging area.

Has there been any changes since the last inspection regarding the following items:

Plant/flow/process layout? Yes ☐ No ☒

Processes? Yes ☐ No ☒ If yes, explain:

Production Levels? Yes ☒ No ☐ If yes, explain: Down from 5 million lbs solution heat treated in the first part of '08 to 2 million lbs solution heat treated reported during the first part of '09.

Raw materials? Yes ☐ No ☐ If yes, explain:

Flow rates? Yes ☒ No ☐ If yes, explain: Down from 1,300 gpd during the first part of '08 to about 890 gpd reported the first part of '09.

Are regulated and non-regulated wastestreams combined?	yes ☐	no ☒	
Prior to Pretreatment System?	yes ☐	no ☐	N/A ☒
If Yes, was the CWF used to calculate limits?	yes ☐	no ☐	N/A ☒
Prior to connection to the POTW sanitary sewer?	yes ☐	no ☒	N/A ☐
At connection to sanitary sewer?	yes ☐	no ☒	N/A ☐
Production and flows verified for Production-Based Standards?	yes ☒	no ☐	N/A ☐

Discussion of "off-lbs" production to place. Facility may not be accounting for scrap placed back into production and getting "full credit" in their limits' calculations. Facility has had no history of exceeding them anyway.

What is the current avg. production rate and process flow? See above

Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? yes ☒ no ☐
Sent example Cr calculation to Greg via e-mail on 10/27/09. Zn and O&G equivalent limits will need to also be recalculated.

B. Facility Permits

Permit Type	Permit No.	Expiration Date
Air	2082-A	???
RCRA		
NPDES (stormwater)	ARR00A027 (no exposure)	3/31/09
Other		

C. Additional Comments

(Note which section or attachment comments are regarding)

Section D: Chemical Storage, MSDS

Mr. Cothren sent the MSDS for the three (3) chemicals added to the recirculated quench tank/cooling tower system. Those include corrosion/scaled inhibitors and a biocide. MSDS on file now.

Section F: Self Monitoring

Broken chain of custody because they use a mass carrier was discussed. The only solution EPA and others have determined is to have sample container sealed with tape and hopefully have the driver at least write in "UPS, FedX, etc" in received box on Chain of Custody (C of C). The C of C should be sealed in a water proof baggie and inserted into the sample container upon which the contract lab can continue the "chain" and determine if seal had been tampered with.

Attachment A: Industrial Process(es)

List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not

1. Solution heat treat quench water	Yes ☒ No ☐	4.	Yes ☐ No ☐
2.	Yes ☐ No ☐	5.	Yes ☐ No ☐

Were processes visually inspected? Yes ☒ No ☐ N/A ☐

Brief description of process(es): Aluminum ingots are melted in 3 gas fired furnaces. Flux is added to control oxidation. Molten Al is either directly transferred to one of 18 casting machines, the electrical de-gas units and/or natural gas-fired ladle heaters. Molds are water-base insulation sprayed, sprayed with a release coating application and/or Sprue Press lubricated. There is no wastewater generated in this area. Casting machines are cooled via non-contact water circulating through the molds' water jackets.

After components are cast, they are transferred to the Finishing Department. This area is equipped with numerous floor-mounted sanders, band saws, enclosed saw cutters, grinding and several enclosed robotic cells. The function of this department is to use power actuated tools and robotics to trim flash, saw parts, sanding/grinding to ensure that the general part tolerances and shapes are met. All coolants, lubricating oils and tramp oils are self-contained, collected in a tank and sent off-site once spent. No wastewater is generated in this area.

"Waste" Al is pressed into "pucks" which are fed back into oven for re-use. The lbs of "pucks" should be used in the calculation of permit limits with total "off-lbs". It was unclear if the facility was counting this as off-lbs.

Most components, after Finishing Operations, are transferred to gas fired pre-heat furnaces and are placed into the Forge Presses. Parts are heated and dip-coated with a graphite lube to facilitate spray release after forging before going through the pre-heat furnaces.

After undergoing Finishing and/or Forging Operations, all parts are heat-treated in either the In-Line Continuous Solution Heat Treat Furnace or batch heat treated in the Drop Bottom Furnaces.

After exiting the Heat Treat Ovens, parts are submerged in the Quench Water Tanks to complete this heat treat process. The quench waters are re-circulated thru cooling towers and are periodically discharged throughout the day. This is the only wastewater that is regulated at this facility.

The quench tank is continually circulated through a cooling tower. Upon returning to the quench tank, flow is accelerated from a ~3" pipe to a ~1" nozzle. Quench tank is thoroughly mixed and agitated for good homogeneous samples.

General observations of facility's indoor housekeeping: Clean and uncluttered with no visible mist or smoky areas throughout.

General observations of area outside facility's building: Clean and orderly.

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured estimated.

☐ Process Rinse Overflows	☐ Equip. Cleanup	☒ Floor Cleanup < 10 gpd	☐ Spent Bath Solutions
☐ Product Cleaning	☐ Forklifts Maint./Wash	☐ Tank Dragout	☐ Air Pollution Devices
☐ Boiler Blowdown	☐ Spent Rinse Tanks	☐ Equipment Coolants	☐ Non-Contact Cooling Water
☐ Stormwater	☒ Solution heat treatment cooling/quench water batch discharged via cooling tower intermittent, but frequent blowdowns daily @ ~890 gpd		

List Major Raw Materials and Chemicals used:

Aluminum, hydraulic & gear oil, machining coolants and "water treatment chemicals"

Check Waste Stream Pollutants of Concern from Process(es)			
☐ BOD	☐ CN^-	☒ Metals (List): Zinc & Chrome	☐ Solvents (List)
☐ TSS	☐ Cl_2		
☒ O&G as alternative to TTO			
☐ pH	☐		

Are there floor drains in the Process area? ☐ Yes ☒ No If yes list number and the location of all floor drains:

Attachment B: Pollution Prevention (P2) / Recycling Activities

Does the facility have a written P2 Plan? Yes ☐ No ☒

Does this facility practice P2? Yes ☐ No ☒ (This inspector saw very few opportunities)

Environmental Management System in place? Yes ☒ No ☐

ISO Certified? 14001 Yes ☒ No ☐

Written Standard Operating Procedures? Yes ☒ No ☐

Explain: There are written descriptions for each processing area to meet customer specifications.

Preventative Maintenance Program Yes ☒ No ☐ (hydraulic systems, valves, pumps, etc)

Explain: Frequency is determined on an "as needed" basis.

Water Reuse: Yes ☒ No ☐

Explain: Facility recycles both contact and non-contact cooling water with frequent/small volume daily blow down events.

Cost Accounting to Track Savings: Yes ☒ No ☐

Explain:

Inventory Control / "Green Purchasing": Yes ☐ ? No ☐ (lean manufacturing/"env. friendly purchasing", etc)

Explain:

Employee Training: Yes ☒ No ☐

Explain: Facility has a yearly calendar with schedules marked for OSHA, Environmental and Company policies.

Spent Solvent Reclamation? Yes ☐ No ☒

Explain:

Recycle Paper, Aluminum, Boxes, and Pallets? Yes ☒ No ☐

Explain: Facility has their own box bailer and they recycle all the above including aerosol can crusher.

Recycle Waste Oil, Solvents, and Lubricants? Yes ☒ No ☐

Explain: Coolants, lubricating oil and tramp oils are collected and sent off-site for recycle.

Other Activities

P2 Equipment/Best Management Practices in use:	
☐ Overflow Alarms	☒ Aqueous Cleaning Solutions
☒ Recycling of contact as well as non-contact cooling water	☐ Countercurrent Rinsing
☐ Dragout Collection Trays	☐ Seal-Less Pumps
☐ Air Jets to Blow Parts Dry	☐ Secondary Containment of Process Solutions
☐ Aqueous Paint Stripping Solutions	☐ Bead Blasting to Remove Paint
☐ Water Soluble Cutting Fluids	☐ Recycle Overspray
☐ In-Process Recycle (Ion Exchange, Reverse Osmosis)	☐ Conductivity Meters
☐ Dead Rinse Tanks	☐ Bath / Rinse Filtration

Attachment C: Pretreatment System (Pretreatment not necessary to meet Categorical Standards)			
Are wastestreams segregated before pretreatment?	☐ Yes	☐ No	☒ N/A
Are they pretreated prior to discharge to the sanitary sewer?	☐ Yes	☐ No	☒ N/A
Was the pretreatment system visually inspected during this visit?	☐ Yes	☐ No	☒ N/A

Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer: None

☐ Dissolved air floatation	☐ Membrane Tech.	☐ Ion Exchange	☐ Biological Treatment
☐ Centrifugation	☐ Flow Equalization	☐ Ozonation	☐ Chlorinating
☐ Chemical Precipitation	☐ Oil/Water Separation	☐ Reverse Osmosis	☐ Grit Removal
☐ Sludge Filter Press	☐ Grease Trap	☐ Screen	☐ Solvent Separation
☐ pH Adjustment	☐ Sand Trap	☐ Sedimentation	☐ Silver Recovery
☐ Belt/Disk Oil Skimmer	☐	☐	☐

Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order): N/A

Does the description match the schematic currently on file? ☐ Yes ☐ No ☒ N/A

System Operator(s) Name:

Does discharge permit require licensed operator? ☐ Yes ☐ No ☒ N/A

Is the System Operator(s) licensed by the State of Arkansas? ☐ Yes ☐ No ☒ N/A

List Name(s) and License classification: N/A

Is training provided to the Pretreatment System Operator(s)? ☐ Yes ☐ No ☒ N/A

If Yes, list type and frequency:

Is the discharge from the Pretreatment System? ☐ Batch ☐ Continuous ☐ Combination ☒ N/A

If any discharges are batch type or combination, describe the following:

Volume of batch(es): ~890 gpd via numerous intermittent dumps from the cooling tower throughout the day.

Describe process from which batch(es) originated (spent bath, e.g.): Solution Heat Treatment "quench" tank after being re-circulated through a cooling tower for a period of time. Batch discharges from quench tank is through the contact cooling water system's numerous blow downs throughout the day.

Approximate duration of batch discharges: depends on the system's ("Chem Aqua") sensors.

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
Kent/ABB C-700 Positive Displacement	Not determined	

Attachment D: Chemical Storage Area(s)

Does the facility have a designated chemical storage area(s)? ☒Yes ☐No

Was this area(s) visually inspected? ☒Yes ☐No ☐N/A

Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. Various drums and containers in small quantities are located near work stations.	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2.	☐Yes ☐No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
3.	☐Yes ☐No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
4.	☐Yes ☐No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer

Does the Chemical Storage Area(s) contain any of the following?

☐ Dikes, Berms for Containment	☐ Plugs for Floor Drains
☐ Secondary Tanks for Holding	☐ Premix (low) Concentrations
☐ Alarms	☐ Chain restraints, limited access
☐ Spills Control Kits for Cleanup	☐ Notification Procedures
☐ Chemical desegregation within Storage Area	☒ Barrels rest on grated self-containment containers

Chemical Inventory List (MSDS) on file? ☒Yes ☐No ☐N/A

Were any new MSDS reviewed during the Inspection? ☐Yes ☒No ☐N/A

If yes, list below: Facility rep sent the three (3) types of chemicals used in the recycled quench water system. There's a biocide, corrosion inhibitor and stabilizer.

Facility rep indicated their MSDS notebooks needed and will be "cleaned up" and updated. The rep did have a condensed two-page and laminated list of chemical brands used.

Chemical storage comments: This inspector could foresee no chemical spills reaching the outside of the building, they were in such small quantities. ~40 to 50 barrels and totes are stored in a caged in area with a sign out sheet for employees taking to sign taking chems/volumes out.

Chemical handling procedures (totes, dolly, buckets, hardline, etc):

Typically, employees fill buckets from which chemicals are hand pumped at their various work stations. "Bulk" chemicals in barrels are brought in to caged area by specially equipped fork lifts with "jaws" that wrap around barrels for transport to storage area.

Attachment E: Spill/Slug Control Plan (Slug Potential determined to be non-existent)	
Does the facility have a Spill/Slug control plan? Slug discharge potential improbable.	☐ yes ☒ no
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	☐ yes ☐ no ☐ N/A
(A) Describes discharge practices including non routine batch (slug) discharges	☐ yes ☐ no ☐ N/A
(B) Describes storage and handling of chemicals	☐ yes ☐ no ☐ N/A
(C) Procedures for immediate notification to POTW of slug discharges	☐ yes ☐ no ☐ N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	☐ yes ☐ no ☐ N/A
2. Describes procedures and equipment for emergency response	☐ yes ☐ no ☐ N/A
3. Describes follow-up to limit damage suffered by POTW or environment	☐ yes ☐ no ☐ N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☐ no ☐ N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no ☐ N/A
If no:	
Does the facility have Spill/~~Slug Notification~~ Procedures posted?	☒ yes ☐ no
Is it posted in areas where chemicals are used and stored?	☒ yes ☐ no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill ~~or slug discharge~~?	☒ yes ☐ no
Has there been any non-routine, episodic discharges or chemical spills in the past year?	☐ yes ☒ no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? ☐ yes ☐ no ☒ N/A	
Visual Inspection of Discharge Lines/Points	
Provide description of sampling point condition and flow channel of the following where applicable:	
Sampling / Monitoring Point: As previously mentioned, the sampling point is the quench tank just next to heat treatment oven. For lack of a more convenient point, this could be deemed adequate.	
Total Flow Monitoring Point: Batch (blow-down) flows are metered in a building with the manifolds recirculating (separately) contact and non-contact cooling waters.	
Point of Connection: N/A	

Attachment F: Self-Monitoring

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title. Sampling point is the quench tank after heat treatment. Employee has to bend over grating, wearing heat resistant glove to physically dip sample container(s) into quench tank. There's only a small space to reach over into the quench tank to take these samples. Other than being awkward, sampling is adequate.

Where is the sample point located?

☐ End of Process	☐ Pretreatment Effluent	☐ Total Flow
☐ Combined Flow	☐ Metered Flow	☐ Flow Actuator
☐ Private Manhole	☐ Utility Manhole	☐ Advance Notice Required
☐ Safety Hazards Identified	☒ At left-hand side of quench tank, opposite the return from cooling tower nozzle.	

Is the Sample Collection Site Adequate?	☒ Yes ☐ No ☐ N/A
Does the facility rep. request a split sample on this sampling/inspection?	☐ Yes ☒ No
Does the facility perform self-monitoring tests in-house?	☐ Yes ☒ No ☐ N/A

If no, record the name and address of Contract Lab: American Interplex, Little Rock

Automatic Sampler ☐ or Manual ☒

IU Self-Monitoring Results reviewed: The last chain of custody found in files sample dated 4/11/08 was incomplete. There was no one Kenny Sanders relinquished the sample to (4/11) before the lab received it on 4/15. Container type and preservatives were not noted.	☒ Yes ☐ No ☐ N/A
Is the Contract Lab certified by ADEQ for test parameters?	☒ Yes ☐ No ☐ N/A
Dates and Times of Sample Analysis Recorded?	☒ Yes ☐ No ☐ N/A
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
EPA recommended holding times being met (Refer to 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
Chain of Custody Records for Self-Monitoring Samples Reviewed	☒ Yes ☐ No ☐ N/A
Were correct Sample Types Collected	☒ Yes ☐ No ☐ N/A
Dates and times of Sample Collection Recorded?	☒ Yes ☐ No ☐ N/A
Were Samples preserved correctly (refer to 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
Were Self Monitoring records on file for past 3 years?	☒ Yes ☐ No ☐ N/A

List the parameters the facility monitors and the frequency: Semi-annually for all.

☐ Cd(t)	☐ Cu(t)	☒ Cr(t)	☐ Ni(t)	☐ Pb(t)
☐ Ag(t)	☒ Zn(t)	☐ pH	☐ CN^-(t)	☐ CN^-(a-c)
☐ TTO-Vol	☐ TTO-B/N	☐ TTO-A.E.	☐ TTO-Pest	☐ Cr(hex)
☒ O&G alternative for TTOs		☐	☐	☐

Attachment F: Self-Monitoring

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title. Sampling point is the quench tank after heat treatment. Employee has to bend over grating, wearing heat resistant glove to physically dip sample container(s) into quench tank. There's only a small space to reach over into the quench tank to take these samples. Other than being awkward, sampling is adequate.

Where is the sample point located?

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☐ Combined Flow	☐ Metered Flow	☐ Flow Actuator
☐ Private Manhole	☐ Utility Manhole	☐ Advance Notice Required
☐ Safety Hazards Identified	☒ At left-hand side of quench tank, opposite the return from cooling tower nozzle.	

Is the Sample Collection Site Adequate?	☒ Yes ☐ No ☐ N/A
Does the facility rep. request a split sample on this sampling/inspection?	☐ Yes ☒ No
Does the facility perform self-monitoring tests in-house?	☐ Yes ☒ No ☐ N/A

If no, record the name and address of Contract Lab: American Interplex, Little Rock

Automatic Sampler ☐ or Manual ☒

IU Self-Monitoring Results reviewed: The last chain of custody found in files sample dated 4/11/08 was incomplete. There was no one Kenny Sanders relinquished the sample to (4/11) before the lab received it on 4/15. Container type and preservatives were not noted.	☒ Yes ☐ No ☐ N/A
Is the Contract Lab certified by ADEQ for test parameters?	☒ Yes ☐ No ☐ N/A
Dates and Times of Sample Analysis Recorded?	☒ Yes ☐ No ☐ N/A
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
EPA recommended holding times being met (Refer to 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
Chain of Custody Records for Self-Monitoring Samples Reviewed	☒ Yes ☐ No ☐ N/A
Were correct Sample Types Collected	☒ Yes ☐ No ☐ N/A
Dates and times of Sample Collection Recorded?	☒ Yes ☐ No ☐ N/A
Were Samples preserved correctly (refer to 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
Were Self Monitoring records on file for past 3 years?	☒ Yes ☐ No ☐ N/A

List the parameters the facility monitors and the frequency: Semi-annually for all.

☐ Cd(t)	☐ Cu(t)	☒ Cr(t)	☐ Ni(t)	☐ Pb(t)
☐ Ag(t)	☒ Zn(t)	☐ pH	☐ CN^-(t)	☐ CN^-(a-c)
☐ TTO-Vol	☐ TTO-B/N	☐ TTO-A.E.	☐ TTO-Pest	☐ Cr(hex)
☒ O&G alternative for TTOs		☐	☐	☐

Attachment A-1

Arkansas Department of Environmental Quality

5301 Northshore Drive
North Little Rock, AR 72118

- CERTIFICATE OF ANALYSIS -

Our Lab#: 2009-2978
Sample ID: Quench Tank 1 - St. Jean Ind.
Sample Type: X
Sample Collect Date: 11/3/2009
Report Date: 11/12/2009

Test Group	Test		Result	Units	Analysis Date	MDL	RDL
ICP/MS-T							
	Aluminum		1540	µg/L	11/9/2009	20	20.0
	Antimony	<	10.0	µg/L	11/9/2009	5	10.0
	Arsenic	<	1.00	µg/L	11/9/2009	0.5	1.00
	Barium		14.6	µg/L	11/9/2009	2	10.0
	Beryllium	<	0.50	µg/L	11/9/2009	0.1	0.50
	Boron		29.5	µg/L	11/9/2009	5	25.0
	Cadmium	<	1.00	µg/L	11/9/2009	0.3	1.00
	Calcium		6.17	mg/L	11/9/2009	0.04	0.040
	Chromium		4.83	µg/L	11/9/2009	0.3	1.00
	Cobalt	<	1.00	µg/L	11/9/2009	0.5	1.00
	Copper		20.6	µg/L	11/9/2009	0.5	1.00
	Iron		1260	µg/L	11/9/2009	10	20.0
	Lead		2.03	µg/L	11/9/2009	0.1	1.00
	Magnesium		10.4	mg/L	11/9/2009	0.1	0.10
	Manganese		32.3	µg/L	11/9/2009	0.2	1.00
	Nickel	<	2.50	µg/L	11/9/2009	0.5	2.50
	Potassium		43.2	mg/L	11/9/2009	0.05	0.100
	Selenium	<	2.00	µg/L	11/9/2009	0.5	2.00
	Silicon Dioxide		5.54	mg/L	11/9/2009	0.02	0.20
	Silver	<	5.00	µg/L	11/9/2009	1	5.00
	Sodium		27.7	mg/L	11/9/2009	0.02	0.040
	Thallium	<	2.50	µg/L	11/9/2009	0.5	2.50
	Vanadium	<	2.50	µg/L	11/9/2009	1	2.50
	Zinc		274	µg/L	11/9/2009	2	3.00
Oil & Grease							
	Oil and Grease	<	1.4	mg/L	11/10/2009	1.4	1.4

Attachment A-2

Arkansas Department of Environmental Quality

5301 Northshore Drive
North Little Rock, AR 72118

- CERTIFICATE OF ANALYSIS -

Our Lab#: 2009-2979
Sample ID: Quench Tank 2 & 3 - St. Jean Ind.
Sample Collect Date: 11/3/2009
Sample Type: X
Report Date: 11/12/2009

Test Group	Test		Result	Units	Analysis Date	MDL	RDL
ICP/MS-T							
	Aluminum		1660	µg/L	11/9/2009	20	20.0
	Antimony	<	10.0	µg/L	11/9/2009	5	10.0
	Arsenic	<	1.00	µg/L	11/9/2009	0.5	1.00
	Barium		15.2	µg/L	11/9/2009	2	10.0
	Beryllium	<	0.50	µg/L	11/9/2009	0.1	0.50
	Boron		30.8	µg/L	11/9/2009	5	25.0
	Cadmium	<	1.00	µg/L	11/9/2009	0.3	1.00
	Calcium		6.40	mg/L	11/9/2009	0.04	0.040
	Chromium		4.63	µg/L	11/9/2009	0.3	1.00
	Cobalt	<	1.00	µg/L	11/9/2009	0.5	1.00
	Copper		20.8	µg/L	11/9/2009	0.5	1.00
	Iron		1290	µg/L	11/9/2009	10	20.0
	Lead		2.10	µg/L	11/9/2009	0.1	1.00
	Magnesium		10.8	mg/L	11/9/2009	0.1	0.10
	Manganese		33.2	µg/L	11/9/2009	0.2	1.00
	Nickel		2.54	µg/L	11/9/2009	0.5	2.50
	Potassium		45.1	mg/L	11/9/2009	0.05	0.100
	Selenium	<	2.00	µg/L	11/9/2009	0.5	2.00
	Silicon Dioxide		5.71	mg/L	11/9/2009	0.02	0.20
	Silver	<	5.00	µg/L	11/9/2009	1	5.00
	Sodium		28.8	mg/L	11/9/2009	0.02	0.040
	Thallium	<	2.50	µg/L	11/9/2009	0.5	2.50
	Vanadium	<	2.50	µg/L	11/9/2009	1	2.50
	Zinc		265	µg/L	11/9/2009	2	3.00
Oil & Grease							
	Oil and Grease	<	1.4	mg/L	11/10/2009	1.4	1.4