

**SEMI-ANNUAL PRETREATMENT REPORT
FOR THE DISCHARGE TO THE CITY OF DUMAS
WASTEWATER TREATMENT SYSTEM**

For

**SAF-Holland, Inc.
North Plant
801 South Main Street
Dumas, Arkansas**

PREPARED BY:



**Engineering Compliance & Construction, Inc.
13000 Cantrell Road
Little Rock, Arkansas 72223
Telephone: (501) 975-8100**

December

2018

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PREPARED BY:



PENNYE L. DERRYBERRY, REM #7776
ECCI, SENIOR PROJECT MANAGER

REVIEWED BY:



RODNEY K. BREUER, P.E.
ECCI, Vice President

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 433

Use of this form is not an ADEQ requirement, but satisfies the reporting requirements in 40 CFR 403.12(e).

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION and NPDES Pretreatment Tracking # ARP00001061

<p>A. LEGAL NAME & MAILING ADDRESS</p> <p>SAF-Holland, Inc. – North Plant PO Box 157 Dumas, AR 71639</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p>SAF-Holland, Inc. – North Plant 1103 North Main Street Dumas, AR 71639</p>
<p>C. FACILITY CONTACT: Mark Gregory TELEPHONE NUMBER: 870-382-2299 E-MAIL: Mark.Gregory@safholland.com</p>	

(2) REPORTING PERIOD--FISCAL YEAR From _____ to _____ (Both Semi-Annual Reports must cover Fiscal Year)

<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p><u>June</u> & <u>December</u></p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p>FROM: July 2018 TO: December 2018</p>
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(3) DESCRIPTION OF OPERATION

<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Electroplating <input type="checkbox"/> Electroless Plating <input type="checkbox"/> Anodizing <input checked="" type="checkbox"/> Coating (conversion) <input type="checkbox"/> Chemical Etching and Milling <input type="checkbox"/> Printed Circuit Board Manufacture</p> <p><u>ANCILLARY PROCESS(ES)*</u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p><u>cleaning, painting</u></p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p><small>*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS</small></p>	<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> <p>None</p>
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<p>C. Number of Regular Employees at this Facility <u>136</u></p>	<p>D. [Reserved]</p>
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(4) FLOW MEASUREMENT

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge*
Regulated (Core & Anc)	15,690 gpd 2300 gallons/week	23,669 gpd 2300 gallons/week	Continuous Batch (1/5days)
Regulated (Cyanide)	NA	NA	NA
' 403.6(e) Unregulated'	10 gpd	10 gpd	Continuous
' 403.6(e) Dilute			
Cooling Water			
Sanitary	2720 gpd	2720 gpd	Continuous
Total Flow to POTW	18,470 gpd 20,770 gpd (1/5 days)	26,399 gpd 28,699 gpd (1/5 days)	Continuous Batch (1/5 days)

*If batch discharged please list the period of time of each batch discharge (300 gallons/day; 500 gallons/week, 2,000 gallons/3 months, etc). Do not normalize over that period for the average flow.
 **"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 OF 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.

40 CFR 433.17 Pollutant(mg/l) limits	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*
Max for 1 day	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Monthly Avg	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	ND	ND	0.600	ND	0.028	ND	0.716	ND	NA
Avg Measured**	ND	ND	0.600	ND	0.028	ND	0.716	ND	NA

Sample Location sump prior to discharge to the POTW

Sample Type (Grab* or Composite) Grab (Cyanide), Composite (all other parameters)

* If Grab, list # of grabs over what period of time: 1 sample for CN

Number of Samples and Frequency Collected: Composite sampler used:

40CFR136 Preservation and Analytical Methods Use: Yes No (include complete Chain of Custody)

* If a TOMP has been submitted and approved by ADEQ place N/A.

** A value here is the average of all samples taken during one (1) calendar month regardless of number of samples taken. If only one (1) sample is taken it must meet the monthly average limitation.

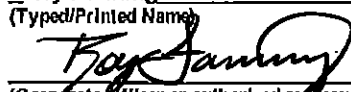
(6) CERTIFICATION (ONLY IF A TOMP HAS BEEN SUBMITTED/APPROVED BY ADEQ)

B. CHECK ONE: 433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED 433.12(a) TTO CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last semi-annual compliance report. I further certify that this facility is implementing the toxic organic management plan submitted to Arkansas Department of Environmental Quality.

Roy Fanning

(Typed/Printed Name)



(Corporate Officer or authorized representative signature)

Date of Signature 12/28/2018

(7) POLLUTION PREVENTION ACT OF 1990 (42 U.S.C. 13101-13113)

16602 (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 including Best or Environmental Management Practices, Source Reduction, Waste Minimization, Lean Manufacturing, Water and/or Energy Conservation:

1. The facility has implemented a Toxic Organic Management Plan (TOMP)
2. _____
3. _____
4. _____
5. _____

(8) GENERAL COMMENTS

Flows are based on the water usage as shown on the facility water bills from July through November. The December water bills had not been received prior to the reporting deadline. The large batch discharge (system dump) took place during the first week of December. Consequently, this flow volume will be accounted for on the next Semi-Annual Report.

(9) SEMI-ANNUAL/PERIODIC REPORT CERTIFICATION STATEMENT REQUIRED UNDER 40 CFR 403.12(j)

I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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.

Roy Fanning

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Plant Manager

OFFICIAL TITLE



SIGNATURE

12/28/2018

DATE SIGNED



8100 National Dr. - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

21 December 2018

Penny Bray
Engineering, Compliance, & Construction, Inc.
13000 Cantrell Rd.
Little Rock, AR 72223-1637

Project: SAF-Holland North Plant
Project Number: December 2018
SDG Number: 1812246

Enclosed are the results of analyses for samples received by the laboratory on 14-Dec-18 13:48. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

<u>Custody Seals</u>	✓
<u>Containers Correct</u>	✓
<u>COC/Labels Agree</u>	✓
<u>Received On Ice</u>	✓
Temperature on Receipt	4.0°C

Sincerely,

A handwritten signature in blue ink that reads "Norma James / Teresa Coins".

Norma James and/or Teresa Coins
Technical Director and/or QA Officer

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Pennye Bray
Engineering, Compliance, & Construction, Inc.
13000 Cantrell Rd.
Little Rock, AR 72223-1637
Project: SAF-Holland North Plant
Project Number: December 2018
Date Received: 14-Dec-18 13:48

ANALYTICAL RESULTS

Lab Number: 1812246-01
Sample Name: System Discharge Grab
Date/Time Collected: 12/14/18 11:30
Sample Matrix: Water

<u>Field Analyses</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
pH	S.U.	8.53		12/14/18 11:31	B812333	SM 4500-H+ B-2011

<u>Wet Chemistry</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Cyanide (total)	mg/L	0.010		12/18/18 15:54	B812262	SM 4500-CN B,E-2011

ANALYTICAL RESULTS

Lab Number: 1812246-02
Sample Name: System Discharge Composite
Date/Time Collected: 12/14/18 11:25
Sample Matrix: Water

<u>Total Metals</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Cadmium	mg/L	< 0.00120		12/17/18 16:11	B812228	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	< 0.0125		12/17/18 16:11	B812228	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	0.600		12/17/18 16:11	B812228	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0156		12/17/18 16:11	B812228	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	0.0278		12/17/18 16:11	B812228	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0208		12/17/18 16:11	B812228	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	0.716		12/17/18 16:11	B812228	EPA 200.7, Rev 4.4 (1994)



Penny Bray
Engineering, Compliance, & Construction, Inc.
13000 Cantrell Rd.
Little Rock, AR 72223-1637
Project: SAF-Holland North Plant
Project Number: December 2018
Date Received: 14-Dec-18 13:48

QUALITY CONTROL RESULTS

Total Metals -- Batch: B812228 (Water)

Prepared: 17-Dec-18 08:29 By: SP -- Analyzed: 17-Dec-18 15:10 By: SP

<u>Analyte</u>	<u>BLK</u>	<u>LCS / LCSD</u>	<u>MS / MSD</u>	<u>Dup</u>	<u>RPD</u>	<u>Qualifiers</u>
Cadmium	<0.00120 mg/L	105% / NA	106% / 107%		1.16%	
Chromium	<0.0125 mg/L	104% / NA	99.8% / 101%		1.24%	
Copper	<0.00520 mg/L	105% / NA	97.1% / 98.3%		1.22%	
Lead	<0.0156 mg/L	109% / NA	98.9% / 99.9%		0.961%	
Nickel	<0.0104 mg/L	107% / NA	101% / 102%		1.07%	
Silver	<0.0208 mg/L	104% / NA	95.7% / 96.4%		0.743%	
Zinc	<0.0156 mg/L	105% / NA	107% / 108%		0.998%	

Wet Chemistry -- Batch: B812262 (Water)

Prepared: 18-Dec-18 09:00 By: EP -- Analyzed: 18-Dec-18 15:54 By: EP

<u>Analyte</u>	<u>BLK</u>	<u>LCS / LCSD</u>	<u>MS / MSD</u>	<u>Dup</u>	<u>RPD</u>	<u>Qualifiers</u>
Cyanide (total)	<0.010 mg/L	109% / NA	105% / 115%		8.33%	

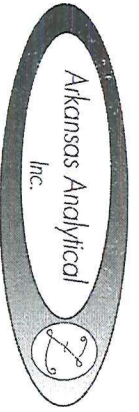
Field Analyses -- Batch: B812333 (Water)

Prepared: 14-Dec-18 08:24 By: CNW -- Analyzed: 14-Dec-18 08:24 By: MB

<u>Analyte</u>	<u>BLK</u>	<u>LCS / LCSD</u>	<u>MS / MSD</u>	<u>Dup</u>	<u>RPD</u>	<u>Qualifiers</u>
pH (Field)	NA	102% / 102%	NA / NA		0.00%	

All Analysis performed according to EPA approved methodology when available :
 SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.
 Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Reviewed by: Norma James / Teresa Coins
 Norma James and/or Teresa Coins
 Technical Director and/or QA Officer



8100 National Drive
 Little Rock, AR 72209
 PHONE: 501-455-3233
 FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION		BILLING INFORMATION		Project Description		Turnaround Time		Preservation Codes:	
ECCI	SAF-Holland, Inc.	SAF-Holland, Inc.		SAF-Holland North Plant	1 Day (100%)	1. Cool, 6 Degrees Centigrade	4. Thiosulfate for Dechlorination		
13000 Cantrell Rd.	P.O. Box 825				2 Day (50%)	2. Sulfuric Acid (H ₂ SO ₄), pH < 2	5. Hydrochloric Acid(HCl)		
Little Rock, AR 72223	Dumas, AR 71639				3 Day (25%)	3. Nitric Acid (HNO ₃), pH < 2	6. Sodium Hydroxide (NaOH), pH > 12		
Attn: Penny Bray		Attn: Accounts Payable		Reporting Information		5 Day (Routine)		TEST PARAMETERS	
				Telephone: 501-975-8100		Preservative Code:		1.6 P	
				Fax: 501-975-6789		Bottle Type:		1.3 P	
				Email: PBray@eccci.com					
Sampler(s) Signature <i>Crest Wood</i>		Sampler(s) Printed <i>Cliff Wood</i>		SAMPLE IDENTIFICATION/ DESCRIPTION		Field pH		Cyanide	
Field Number	SAMPLE COLLECTION Dates/	Grab	Comp	Number of Bottles	Sample Matrix	Cd, Cr, Cu, Pb, Ni, Ag, Zn			
	12/14/18	X		1	Water	X	X		
	12/13/18		X	1	Water				
	1025-				System Discharge Composite		X		
	1125								
*collection times corrected by lab - per chert wood - 12/21/18 - 8									
1. Relinquished by: (Signature)		Date/Time		2. Received by: (Signature)		SAMPLE CONDITION UPON RECEIPT IN LAB		REMARKS / SAMPLE COMMENTS	
<i>Crest Wood</i>		12/14/18				1. CUSTODY SEALS: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		8.53 8.52	
		1348				2. CONTAINERS CORRECT: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		1131 1132	
3. Relinquished by: (Signature)		Date/Time		4. Received by lab: (Signature)		3. COC/LABELS AGREE: Yes <input type="checkbox"/> No <input type="checkbox"/>		temp 33.2 33.3	
				<i>Johnny Riddle</i>		4. RECEIVED ON ICE: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		time 1131 1132	
						5. TEMPERATURE ON RECEIPT: 4 °C			
						6. TEMPERATURE GUN ID: HHT# 2			
						FOR COMPLETION BY LAB ONLY			