

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

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

<p><b>A. MONTHS WHICH REPORTS ARE DUE</b></p> <p><u>June</u> &amp; <u>December</u></p>	<p><b>B. PERIOD COVERED BY THIS REPORT</b></p> <p><b>FROM: July 1, 2020 TO: December 31, 2020</b></p>
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**(3) DESCRIPTION OF OPERATION**

<p><b>A. REGULATED PROCESSES</b></p> <p><b><u>CORE PROCESS(ES)</u></b></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><b><u>ANCILLARY PROCESS(ES)*</u></b></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><small>*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS</small></p>	<p><b>B. CHANGES:</b>      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><b>None</b></p>
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**C. Number of Regular Employees at this Facility 136**

**D. [Reserved]**

**(4) FLOW MEASUREMENT**

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

Process	Average	Maximum	Type of Discharge*
Regulated (Core & Anc)	See explanation in Section 8 below	See explanation in Section 8 below	Continuous
Regulated (Cyanide)			NA
' 403.6(e) Unregulated*			Continuous
' 403.6(e) Dilute			
Cooling Water			
Sanitary			Continuous
Total Flow to POTW			Continuous

\*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	< 0.0012	< 0.012	0.0276	< 0.0150	0.0158	< 0.0200	0.239	0.031	NA
Avg Measured**	< 0.0012	< 0.012	0.0276	< 0.0150	0.0158	< 0.0200	0.239	0.031	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 04 JAN 2021

(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 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

In general, flows reported are based on the water usage as shown on the facility water bills from the period of July-November. However, for this semi-annual monitoring period, the water bills showed zero gallons water usage. Consequently, Section 4 cannot be completed. According to facility personnel, the city initially stated that, due to restrictions associated with Covid -19, the facility meter was not being read and the facility was being charged a flat rate for water usage. However, upon further investigation it was determined that the meter/counter at the facility had quit working and had not been properly reported. The city is currently working to repair the problem and hopes to have the meter functioning properly in January 2021.

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

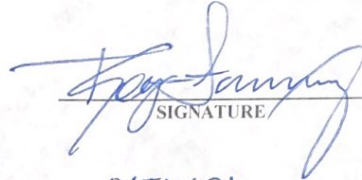
I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information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

04 JAN 21

DATE SIGNED



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

15 December 2020

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

Project: SAF-Holland North Plant  
Project Number: December 2020  
SDG Number: 2012140

Enclosed are the results of analyses for samples received by the laboratory on 08-Dec-20 15:15. 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".

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

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**Penny Bray**  
**Engineering, Compliance, & Construction, Inc.**  
**13000 Cantrell Rd.**  
**Little Rock, AR 72223-1637**  
**Project: SAF-Holland North Plant**  
**Project Number: December 2020**  
**Date Received: 08-Dec-20 15:15**

**ANALYTICAL RESULTS**

**Lab Number:** 2012140-01  
**Sample Name:** System Discharge Grab  
**Date/Time Collected:** 12/8/20 13:40  
**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.	7.13		12/8/20 13:40	B012253	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	0.031		12/14/20 8:22	B012265	SM 4500-CN B,E-2011

**ANALYTICAL RESULTS**

**Lab Number:** 2012140-02  
**Sample Name:** System Discharge Composite  
**Date/Time Collected:** 12/8/20 13:30  
**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		12/10/20 14:17	B012161	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	< 0.0120		12/10/20 14:17	B012161	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	0.0276		12/10/20 14:17	B012161	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0150		12/10/20 14:17	B012161	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	0.0158		12/10/20 14:17	B012161	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0200		12/10/20 14:17	B012161	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	0.239		12/10/20 14:17	B012161	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 2020**  
**Date Received: 08-Dec-20 15:15**

**QUALITY CONTROL RESULTS**

**Total Metals -- Batch: B012161 (Water)**

**Prepared: 20-Dec-09 10:27 By: SPS -- Analyzed: 10-Dec-20 12:33 By: ST**

<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	104% / NA	103% / 102%		0.873%	
Chromium	<0.0120 mg/L	102% / NA	100% / 99.3%		0.683%	
Copper	<0.00500 mg/L	103% / NA	97.8% / 97.3%		0.481%	
Lead	<0.0150 mg/L	106% / NA	99.3% / 98.8%		0.485%	
Nickel	<0.0100 mg/L	104% / NA	99.3% / 98.8%		0.534%	
Silver	<0.0200 mg/L	102% / NA	95.4% / 95.5%		0.121%	
Zinc	<0.0150 mg/L	98.0% / NA	99.9% / 99.5%		0.398%	

**Field Analyses -- Batch: B012253 (Water)**

**Prepared: 08-Dec-20 09:40 By: MH -- Analyzed: 08-Dec-20 09:40 By: MH**

<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	101% / 101%	NA / NA		0.142%	

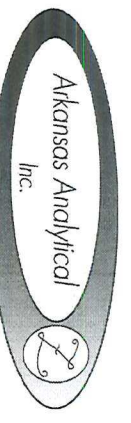
**Wet Chemistry -- Batch: B012265 (Water)**

**Prepared: 14-Dec-20 08:22 By: JH -- Analyzed: 14-Dec-20 08:22 By: JH**

<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	121% / NA	118% / 119%		0.669%	

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 North Plant		1 Day (100%)		1. Cool, 6 Degrees Centigrade							
13000 Cantrell Rd.		P.O. Box 825				2 Day (50%)		2. Sulfuric Acid (H <sub>2</sub> SO <sub>4</sub> ), pH < 2							
Little Rock, AR 72223		Dumas, AR 71639		<b>Reporting Information</b>		3 Day (25%)		3. Nitric Acid (HNO <sub>3</sub> ), pH < 2							
Attn: Penny Bray		Attn: Accounts Payable		Telephone: 501-975-8100		5 Day (Routine)		<b>TEST PARAMETERS</b>							
				Fax: 501-975-6789		Preservative Code:		1,6		1,3				Bottle Type Code	
				Email: PBray@eccci.com		Bottle Type:		P		P				G = Glass; P = Plastic	
														V = Seppur; A = Amber	
<b>Sampler(s) Signature</b>		<b>SAMPLE COLLECTION</b>		<b>Sampler(s) Printed</b>		<b>Sample Matrix</b>		<b>IDENTIFICATION/ DESCRIPTION</b>		<b>SAMPLE</b>				Arkansas Analytical Work Order Number:	
[Signature]		Date: 12/8/20 Time: 1340		MARCUS HANSEN		Water		System Discharge Grab		X		X		2012140	
Field Number		Dates		Number of Bottles		System Discharge Composite		System Discharge Composite		X		X		02	
12/7/20-8		1330-1330		1											
1. Relinquished by: (Signature)		Date/Time		2. Received by: (Signature)		ONSITE MEASUREMENTS by Arkansas Analytical -- DATE: 12/8/20									
[Signature]		12/8/20		[Signature]		Sample pH 7.13		Duplicate pH 7.11		QC 705		QC Duplicate 706		Field Calibration Record -- DATE: 12/8/20	
						1340		1342		940		942		pH / Time	
														D.O. 4	
														Time 1	
														QC Time 2	
														Slope 2	
3. Relinquished by: (Signature)		Date/Time		4. Received by lab: (Signature)		SAMPLE CONDITION UPON RECEIPT IN LAB									
[Signature]		12/8/20		Sydney James		1. CUSTODY SEALS: Yes [X] No		2. CONTAINERS CORRECT: Yes [X] No		3. COC/LABELS AGREE: Yes [X] No		4. RECEIVED ON ICE: Yes [X] No		5. TEMPERATURE ON RECEIPT: 4 °C	
						6. TEMPERATURE GUN ID: HHT# 2									
						FOR COMPLETION BY LAB ONLY									