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

June 2019

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FOR THE DISCHARGE TO THE CITY OF DUMAS WASTEWATER TREATMENT SYSTEM

For

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

December 2018

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

A. LEGAL NAME & MAILING ADDRESS

SAF-Holland, Inc. – North Plant
PO Box 157
Dumas, AR 71639

B. FACILITY & LOCATION ADDRESS

SAF-Holland, Inc. – North Plant
1103 North Main Street
Dumas, AR 71639

C. FACILITY CONTACT: Mark Gregory **TELEPHONE NUMBER:** 870-382-2299 **E-MAIL:** Mark.Gregory@safholland.com

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

A. MONTHS WHICH REPORTS ARE DUE

__June_____ & ___December__

B. PERIOD COVERED BY THIS REPORT

FROM: January 1, 2019 TO: June 30, 2019

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

CHECK EACH APPLICABLE BLOCK

- ☐ Electroplating
- ☐ Electroless Plating
- ☐ Anodizing
- ☒ Coating (conversion)
- ☐ Chemical Etching and Milling
- ☐ Printed Circuit Board Manufacture

ANCILLARY PROCESS(ES)*

LIST BELOW EACH PROCESS USED IN THE FACILITY

_cleaning, painting_____

_____

_____

_____

_____

_____

*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

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.

None

C. Number of Regular Employees at this Facility __136____

D. [Reserved]

40 CFR 433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: _SAF-Holland, Inc. North Plant_____

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge*
Regulated (Core & Anc)	19592 gpd	25,793 gpd	Continuous
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	22,322 gpd	28,523	Continuous

*If batch discharged please list the period of time of each batch discharge (300 gallons/day; 500 gallons/week, 2,00(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

X 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	0.009	ND	ND	ND	ND	ND	NA
Avg Measured**	ND	ND	0.009	ND	ND	ND	ND	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: X 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

40 CFR 433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: _SAF-Holland, Inc. North Plant_____

B. CHECK ONE: 433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED X 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 28 JUN 2019

(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

Flows are based on the water usage as shown on the facility water bills from January 11 through June 12, 2019. The water for the remainder of June had not been received prior to the reporting deadline. There were no batch discharges that occurred during this monitoring period.

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

40 CFR 433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: _SAF-Holland, Inc. North Plant_____

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

SIGNATURE

Plant Manager

OFFICIAL TITLE

28 JUN 2019

DATE SIGNED

Arkansas Analytical Inc.

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

14 June 2019

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

Project: SAF-Holland North Plant

Project Number: June 2019

SDG Number: 1906099

Enclosed are the results of analyses for samples received by the laboratory on 07-Jun-19 07:45. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

Custody Seals	✔
Containers Correct	✔
COC/Labels Agree	✔
Received On Ice	✔
Temperature on Receipt	1.0°C

Sincerely,

Norma James / Teresa Coins

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

14 June 2019

Pennye Bray
Engineering, Compliance, & Construction, Inc.
13000 Cantrell Rd.
Little Rock, AR 72223-1637
Project: SAF-Holland North Plant

Project Number: June 2019
Date Received: 07-Jun-19 07:45

ANALYTICAL RESULTS

Lab Number: 1906099-01
Sample Name: System Discharge Grab
Date/Time Collected: 6/6/19 13:16
Sample Matrix: Water

Field Analyses	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
pH	S.U.	**8.36**		6/6/19 13:24	B906239	SM 4500-H+ B-2011

Wet Chemistry	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cyanide (total)	mg/L	< 0.010		6/11/19 8:00	B906156	SM 4500-CN B,E-2011

ANALYTICAL RESULTS

Lab Number: 1906099-02
Sample Name: System Discharge Composite
Date/Time Collected: 6/6/19 11:45
Sample Matrix: Water

Total Metals	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cadmium	mg/L	< 0.00120		6/12/19 14:35	B906168	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	< 0.0125		6/12/19 14:35	B906168	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	**0.00926**		6/12/19 14:35	B906168	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0156		6/12/19 14:35	B906168	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	< 0.0104		6/12/19 14:35	B906168	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0208		6/13/19 9:41	B906168	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	< 0.0156		6/12/19 14:35	B906168	EPA 200.7, Rev 4.4 (1994)

14 June 2019

Pennye Bray
Engineering, Compliance, & Construction, Inc.
13000 Cantrell Rd.
Little Rock, AR 72223-1637
Project: SAF-Holland North Plant

Project Number: June 2019
Date Received: 07-Jun-19 07:45

QUALITY CONTROL RESULTS

Wet Chemistry -- Batch: B906156 (Water)
Prepared: 11-Jun-19 08:00 By: EP -- Analyzed: 11-Jun-19 08:00 By: EP

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Cyanide (total)	<0.010 mg/L	110% / NA	107% / 106%		0.913%	

Total Metals -- Batch: B906168 (Water)
Prepared: 11-Jun-19 16:33 By: SP -- Analyzed: 12-Jun-19 13:52 By: SP

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Cadmium	<0.00120 mg/L	106% / NA	105% / 106%		1.10%	
Chromium	<0.0125 mg/L	106% / NA	102% / 103%		0.950%	
Copper	<0.00520 mg/L	108% / NA	102% / 103%		0.994%	
Lead	<0.0156 mg/L	107% / NA	100% / 101%		0.221%	
Nickel	<0.0104 mg/L	107% / NA	102% / 103%		1.18%	
Silver	<0.0208 mg/L	95.8% / NA	91.2% / 91.2%		0.00373%	
Zinc	<0.0156 mg/L	105% / NA	105% / 105%		0.539%	

Field Analyses -- Batch: B906239 (Water)
Prepared: 06-Jun-19 10:02 By: CNW -- Analyzed: 06-Jun-19 10:02 By: CNW

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
pH (Field)	NA	100% / 99.9%	NA / NA		0.143%	

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

Arkansas Analytical Inc.

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
ECCI	SAF-Holland, Inc.	SAF-Holland North Plant	1 Day (100%)
13000 Cantrell Rd.	P.O. Box 825		2 Day (50%)
Little Rock, AR 72223	Dumas, AR 71639	Reporting Information	3 Day (25%)
		Telephone: 501-975-8100	5 Day (Routine)
Attn: Pennye Bray	Attn: Accounts Payable	Fax: 501-975-6789	Preservative Code:
		Email: PBray@ecci.com	Bottle Type:

Preservation Codes:

1. Cool, 6 Degrees Centigrade
2. Sulfuric Acid (H_2SO_4), pH < 2
3. Nitric Acid (HNO_3), pH < 2
4. Thiosulfate for Dechlorination
5. Hydrochloric Acid(HCl)
6. Sodium Hydroxide (NaOH), pH > 12

Sampler(s) Signature: Clint Wood

Sampler(s) Printed: Clint Wood

Field Number	SAMPLE COLLECTION Date/s	Time/s	Grab	Comp	Number of Bottles	Sample Matrix	SAMPLE IDENTIFICATION/ DESCRIPTION	Field pH	Cyanide	Cd, Cr, Cu, Pb, Ni, Ag, Zn							Arkansas Analytical Work Order Number:
							TEST PARAMETERS		1,6	1,3							Bottle Type Code
									P	P							G = Glass; P = Plastic; V = Septum; A = Amber
	6/6/19	1316	X		1	Water	System Discharge Grab	X	X								1906099 - 01
	6/5/19 6/6/19	start 1245 stop 1145		X	1	Water	System Discharge Composite			X							02

1. Relinquished by: (Signature)	Date/Time	2. Received by: (Signature)
Clint Wood	6/6/19 1807	
3. Relinquished by: (Signature)	Date/Time	4. Received by lab: (Signature)
	6/7/19 0745	Sydney James

SAMPLE CONDITION UPON RECEIPT IN LAB

1. CUSTODY SEALS: ✓ Yes ___ No
2. CONTAINERS CORRECT: ___ Yes ___ No
3. COC/LABELS AGREE: ___ Yes ___ No
4. RECEIVED ON ICE: ___ Yes ___ No
5. TEMPERATURE ON RECEIPT: 1 °C
6. TEMPERATURE GUN ID: HHT# 2

FOR COMPLETION BY LAB ONLY

REMARKS / SAMPLE COMMENTS

pH	8.36	8.36
time	1324	1325
temp	37.5	37.2
time	1324	1325

Revision 3
1/4/16