

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>
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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 _____ 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: December 1, 2019 TO: May 31, 2020</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><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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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)	7706 gpd	10,929gpd	Continuous
Regulated (Cyanide)	NA	NA	NA
' 403.6(e) Unregulated*	10 gpd	10 gpd	Continuous
' 403.6(e) Dilute	NA	NA	
Cooling Water			
Sanitary	644 gpd	860 gpd	Continuous
Total Flow to POTW	7207 gpd	11,518	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	< 0.00125	< 0.0125	0.0233	< 0.0156	< 0.0104	< 0.0208	0.0599	< 0.010	NA
Avg Measured**	< 0.00125	< 0.0125	0.0233	< 0.0156	< 0.0104	< 0.0208	0.0599	< 0.010	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 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 _____

(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 May 24, 2019-November 21, 2019. The water bill for the remainder of November and December had not been received prior to the reporting deadline. There were no batch discharges that occurred during this monitoring period.

The facility is investigating the source of the elevated zinc. There has been no change in the chemical usage during this monitoring period. A review of the SDS for the metal will take place to determine if there have been any changes in the metal composites.

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

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

June 29, 2020

DATE SIGNED



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

12 May 2020

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

Project: SAF-Holland North Plant

Project Number: May 2020

SDG Number: 2005030

Enclosed are the results of analyses for samples received by the laboratory on 05-May-20 14:40. 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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12 May 2020



Pennye Bray
Engineering, Compliance, & Construction, Inc.
13000 Cantrell Rd.
Little Rock, AR 72223-1637
Project: SAF-Holland North Plant
Project Number: May 2020
Date Received: 05-May-20 14:40

ANALYTICAL RESULTS

Lab Number: 2005030-01
Sample Name: System Discharge Grab
Date/Time Collected: 5/5/20 13:10
Sample Matrix: Water

Table with 7 columns: Field Analyses, Units, Result, Qualifier(s), Date/Time Analyzed, Batch, Method. Includes pH and Cyanide (total) data.

ANALYTICAL RESULTS

Lab Number: 2005030-02
Sample Name: System Discharge Composite
Date/Time Collected: 5/5/20 12:15
Sample Matrix: Water

Table with 7 columns: Total Metals, Units, Result, Qualifier(s), Date/Time Analyzed, Batch, Method. Lists various metals like Cadmium, Chromium, Copper, Lead, Nickel, Silver, and Zinc.

12 May 2020



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Project Number: May 2020
Date Received: 05-May-20 14:40

QUALITY CONTROL RESULTS

Total Metals -- Batch: B005048 (Water)

Prepared: 06-May-20 09:42 By: SP -- Analyzed: 07-May-20 10:02 By: SP

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Rows include Cadmium, Chromium, Copper, Lead, Nickel, Silver, and Zinc.

Wet Chemistry -- Batch: B005133 (Water)

Prepared: 11-May-20 08:00 By: SPS -- Analyzed: 11-May-20 08:00 By: SPS

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Row includes Cyanide (total).

Field Analyses -- Batch: B005163 (Water)

Prepared: 05-May-20 10:41 By: MH -- Analyzed: 05-May-20 10:41 By: MH

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Row includes pH (Field).

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: [Signature]
Norma James and/or Teresa Coins
Technical Director and/or QA Officer

12 May 2020

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