

From: [Jamie Belcourt \(adpce.ad\)](mailto:Jamie.Belcourt@adpce.ad)
To: ["William.Briant@safholland.com"](mailto:William.Briant@safholland.com); ["PBray@eccci.com"](mailto:PBray@eccci.com)
Cc: [Stacie Wassell \(adpce.ad\)](mailto:Stacie.Wassell@adpce.ad); [Richard Healey \(adpce.ad\)](mailto:Richard.Healey@adpce.ad)
Subject: SAF Holland - December 2022 Semiannual Pretreatment Report - ARP00001061 (Dumas - AR0033987)
Date: Wednesday, January 18, 2023 1:05:20 PM
Attachments: [image003.png](#)

Hello,

Thank you for submitting SAF-Holland's (Pretreatment ID ARP001061 & AFIN 21-00045) December 2022 semiannual pretreatment report. The report was received, reviewed, and deemed complete and compliant with the reporting requirements in 40 C.F.R. § 403.12(e) and more specifically in compliance with the Metal Finishing standards in 40 C.F.R. § 433.17.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator
**Division of Environmental Quality | Office of Water Quality
Policy and Administration**
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

**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 2022

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For

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

December 2022

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>
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C. FACILITY CONTACT: William Briant **TELEPHONE NUMBER: 870-382-5265** **E-MAIL: William.Briant@safholland.com**

(2) REPORTING PERIOD--FISCAL YEAR From Jan to Dec (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 1, 2022 TO: December 31, 2022</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 150

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)	8555	12,768	Continuous
Regulated (Cyanide)	NA	NA	NA
' 403.6(e) Unregulated*	10	10	Continuous
' 403.6(e) Dilute	0	0	
Cooling Water	0	0	
Sanitary	1600	1600	Continuous
Total Flow to POTW	10,165	14378	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	< 0.0013	< 0.0125	< 0.0369	< 0.0312	0.0104	< 0.0208	< 0.0208	< 0.010	NA
Avg Measured**	< 0.0013	< 0.0125	< 0.0369	< 0.0312	0.0104	< 0.0208	< 0.0208	< 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.

Rebecca T Beckham
(Typed/Printed Name)


(Corporate Officer or authorized representative signature)

Date of Signature 1-5-23

(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

pH - 8.10 S.U.

(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.

Rebecca T. Beckham
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Plant Manager
OFFICIAL TITLE


SIGNATURE

1-5-23
DATE SIGNED



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

26 October 2022

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

Project: SAF-Holland North Plant

Project Number: October 2022

SDG Number: 2210321

Enclosed are the results of analyses for samples received by the laboratory on 18-Oct-22 15:05. 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	5.0°C

Sincerely,

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

Norma James
Technical Director

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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: October 2022
Date Received: 18-Oct-22 15:05

ANALYTICAL RESULTS

Lab Number: 2210321-01
Sample Name: System Discharge Grab
Date/Time Collected: 10/18/22 13:30
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.	8.10		10/18/22 13:30	B210445	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		10/25/22 10:55	B210491	SM 4500-CN B,E-2011

ANALYTICAL RESULTS

Lab Number: 2210321-02
Sample Name: System Discharge Composite
Date/Time Collected: 10/18/22 12:45
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	< 0.00125		10/20/22 14:15	B210411	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	< 0.0125		10/20/22 14:15	B210411	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	0.0369		10/20/22 14:15	B210411	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0312		10/20/22 14:15	B210411	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	< 0.0104		10/20/22 14:15	B210411	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0208		10/20/22 14:15	B210411	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	< 0.0208		10/20/22 14:15	B210411	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: October 2022
Date Received: 18-Oct-22 15:05

QUALITY CONTROL RESULTS
Total Metals -- Batch: B210411 (Water)
Prepared: 20-Oct-22 10:26 By: BS -- Analyzed: 20-Oct-22 15:40 By: BS

<u>Analyte</u>	<u>BLK</u>	<u>LCS / LCSD</u>	<u>MS / MSD</u>	<u>Dup</u>	<u>RPD</u>	<u>Qualifiers</u>
Cadmium	<0.00125 mg/L	97.1% / NA	95.2% / 92.9%		2.42%	
Chromium	<0.0125 mg/L	94.8% / NA	94.8% / 93.4%		1.44%	
Copper	<0.0208 mg/L	96.4% / NA	101% / 97.6%		2.81%	
Lead	<0.0312 mg/L	97.3% / NA	95.2% / 94.3%		0.918%	
Nickel	<0.0104 mg/L	93.7% / NA	92.9% / 90.2%		2.87%	
Silver	<0.0208 mg/L	96.5% / NA	97.1% / 94.3%		2.88%	
Zinc	<0.0208 mg/L	98.5% / NA	96.9% / 95.8%		0.857%	

Field Analyses -- Batch: B210445 (Water)
Prepared: 18-Oct-22 09:47 By: MH -- Analyzed: 18-Oct-22 09:47 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		0.00%	

Wet Chemistry -- Batch: B210491 (Water)
Prepared: 25-Oct-22 10:55 By: JH -- Analyzed: 25-Oct-22 10:55 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	113% / 111%	110% / NA		1.79%	

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
 Technical Director



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		4. Thiosulfate for Dechlorination			
13000 Cantrell Rd.	P.O. Box 825	Reporting Information	2 Day (50%)	2. Sulfuric Acid (H ₂ SO ₄), pH < 2		5. Hydrochloric Acid(HCl)			
Little Rock, AR 72223	Dumas, AR 71639	Telephone: 501-975-8100	3 Day (25%)	3. Nitric Acid (HNO ₃), pH < 2		6. Sodium Hydroxide (NaOH), pH > 12			
Attn: Penny Bray	Attn: Accounts Payable	Fax: 501-975-6789	5 Day (Routine)	TEST PARAMETERS					
		Email: PBray@acct.com, Leroy.Deans@safholland.com	Preservative Code:	1,6	1,3				
			Bottle Type:	P	P				

Sampler(s) Signature: [Signature]

Sampler(s) Printed: **MEADIE HOODAS**

Arkansas Analytical Work Order Number: 2210321

Field Number	SAMPLE COLLECTION Dates	Times	Grab		Sample Matrix	IDENTIFICATION/ DESCRIPTION	SAMPLE		Field pH	Cyanide	Cd, Cr, Cu, Pb, Ni, Ag, N ₅	pH / Time	D.O.	Chlorine
			Grab	Comp			Number of Bottles	TIME						
	10/15/22	1330	X		1	Water	System Discharge Grab	X	X					
	10/17/2018	1245/1245			1	Water	System Discharge Composite			X				

Field Number	SAMPLE COLLECTION Dates	Times	Grab		Sample Matrix	IDENTIFICATION/ DESCRIPTION	SAMPLE		Field pH	Cyanide	Cd, Cr, Cu, Pb, Ni, Ag, N ₅	ON-SITE MEASUREMENTS by Arkansas Analytical -- DATE: 10/15/22					
			Grab	Comp			Number of Bottles	TIME				Sample	Duplicate	QC	QC Duplicate	Time	Slope
												810	812	905	905	10	935
												1330	1332	945	947		

1. Relinquished by: (Signature)	Date/Time	1. Received by: (Signature)	SAMPLE CONDITION UPON RECEIPT IN LAB		REMARKS / SAMPLE COMMENTS
[Signature]	10/15/22	[Signature]	1. CUSTODY SEALS: <input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No	4. RECEIVED ON ICE: <input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No	
			2. CONTAINERS CORRECT: <input type="checkbox"/> Yes / <input type="checkbox"/> No	5. TEMPERATURE ON RECEIPT: <input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No	
			3. COC/LABELS AGREE: <input type="checkbox"/> Yes / <input type="checkbox"/> No	6. TEMPERATURE GUN ID: HHT# 5	

3. Relinquished by: (Signature) [Signature]

Date/Time: [Blank]

4. Received by lab: (Signature) **SYDNEY JAMES**

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: Yes / No

6. TEMPERATURE GUN ID: HHT# 5

FOR COMPLETION BY LAB ONLY