

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, 2023 TO: December 30, 2023</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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<p>C. Number of Regular Employees at this Facility <u>80</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)	11,664	23,004	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	13,274	24,614	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	0.0567	< 0.0312	0.0164	< 0.0208	0.0774	0.052	NA
Avg Measured**	< 0.00125	< 0.0125	0.0567	< 0.0312	0.0164	< 0.0208	0.0774	0.052	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.

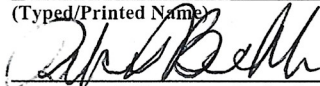
(6) CERTIFICATION (ONLY IF A TOMP HAS BEEN SUBMITTED/APPROVED BY ADEQ)

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 Beckham

(Typed/Printed Name)



(Corporate Officer or authorized representative signature)

Date of Signature 1-2-24

(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 - 8.18 S.U.

In general, the flows reported are based on the water usage readings from the water meter and mass balance calculations using known factors. However, during the preparation of this report it was discovered that the facility water meter was broken and had not been functioning for several months. Consequently, there are no flow readings for this monitoring period. SAF-Holland contacted the city, upon discovering the meter was not working, and it has been repaired.

(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 Beckham
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Plant Manager
OFFICIAL TITLE


SIGNATURE

1-2-27
DATE SIGNED



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

24 October 2023

Penny Bray
ECCI
13000 Cantrell Rd.
Little Rock, AR 72223-1637

Project: SAF-Holland North Plant
Project Number: October 2023
SDG Number: 2310361

Enclosed are the results of analyses for samples received by the laboratory on 17-Oct-23 15:10. 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	1.0°C

Sincerely,

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

Norma James
Technical Director

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Pennye Bray
ECCI
13000 Cantrell Rd.
Little Rock, AR 72223-1637
Project: SAF-Holland North Plant
Project Number: October 2023
Date Received: 17-Oct-23 15:10

ANALYTICAL RESULTS

Lab Number: 2310361-01
Sample Name: System Discharge Grab
Date/Time Collected: 10/17/23 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.	6.67		10/17/23 13:40	B310462	SM 4500-H+ B-2011
Temperature	°C	31.3		10/17/23 13:40	B310468	SM 2550B-2000

<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	0.052		10/19/23 10:36	B310435	SM 4500-CN B,C,E 2016

ANALYTICAL RESULTS

Lab Number: 2310361-02
Sample Name: System Discharge Composite
Date/Time Collected: 10/17/23 12:30
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	< 0.00125		10/18/23 11:30	B310400	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	< 0.0125		10/18/23 11:30	B310400	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	0.0567		10/18/23 11:30	B310400	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0312		10/18/23 11:30	B310400	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	0.0164		10/18/23 11:30	B310400	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0208		10/18/23 11:30	B310400	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	0.0774		10/18/23 11:30	B310400	EPA 200.7, Rev 4.4 (1994)

Pennye Bray
ECCI
13000 Cantrell Rd.
Little Rock, AR 72223-1637
Project: SAF-Holland North Plant
Project Number: October 2023
Date Received: 17-Oct-23 15:10

QUALITY CONTROL RESULTS
Total Metals -- Batch: B310400 (Water)
Prepared: 18-Oct-23 10:30 By: BS -- Analyzed: 18-Oct-23 11:11 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	101% / NA	105% / 106%		1.15%	
Chromium	<0.0125 mg/L	96.7% / NA	103% / 103%		0.915%	
Copper	<0.0208 mg/L	97.8% / NA	111% / 111%		0.421%	
Lead	<0.0312 mg/L	98.8% / NA	101% / 103%		1.31%	
Nickel	<0.0104 mg/L	94.8% / NA	100% / 101%		0.788%	
Silver	<0.0208 mg/L	96.9% / NA	100% / 102%		2.09%	
Zinc	<0.0208 mg/L	100% / NA	106% / 111%		1.37%	

Wet Chemistry -- Batch: B310435 (Water)
Prepared: 19-Oct-23 10:36 By: JB -- Analyzed: 19-Oct-23 10:36 By: JB

<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	95.0% / 96.0%	113% / NA		1.05%	

Field Analyses -- Batch: B310462 (Water)
Prepared: 17-Oct-23 09:47 By: MH -- Analyzed: 17-Oct-23 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		0.284%	

Field Analyses -- Batch: B310468 (Water)
Prepared: 17-Oct-23 11:43 By: MH -- Analyzed: 17-Oct-23 11:43 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>
Temperature (Field)	NA	NA / NA	NA / NA	19.3 °C	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
 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 (flatrate)	TEST PARAMETERS					
		Email: PBray@acfi.com	Preservative Code:	1,6	1,3				
		William Briant@saflholland.com	Bottle Type:	P	P				
Sampler(s) Signature		Sampler(s) Printed		Field (pH, Temperature)		Arkansas Analytical Work Order Number: 12310301			
Field Number	SAMPLE COLLECTION	Grab	Number of Bottles	Sample Matrix	IDENTIFICATION/ DESCRIPTION		SAMPLE		
101723	10/16/23 1348	X	1	Water	System Discharge Grab	X	X		01
Comp Start Date/Time	10/16/23 1230		X	Water	System Discharge Composite		X		02
Comp End Date/Time	10/17/23 1235								
ONSITE MEASUREMENTS by Arkansas Analytical -- DATE: 10/17/23									
Sample	Duplicate	QC	QC Duplicate	pH / Time	D.O. Time	Chlorine QC Time			
667	669	704	706	7	1				
1340	1343	945	947	10	2				
31.3	31.3			940					
1340	1348								
1. Relinquished by: (Signature)		Date/Time	2. Received by: (Signature)		SAMPLE CONDITION UPON RECEIPT IN LAB				
10/17/23 1510					1. CUSTODY SEALS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
10/17/23					2. CONTAINERS CORRECT: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
3. Relinquished by: (Signature)		Date/Time	4. Received by lab: (Signature)		3. COC/LABELS AGREE: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
10/17/23			10/17/23		4. RECEIVED ON ICE: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
					5. TEMPERATURE ON RECEIPT: 1 °C				
					6. TEMPERATURE GUN ID: HHT# 5				
					FOR COMPLETION BY LAB ONLY				
					REMARKS / SAMPLE COMMENTS				

Alan Anderson (adpce.ad)

From: Alan Anderson (adpce.ad)
Sent: Tuesday, January 30, 2024 11:34 AM
To: 'william.briant@safholland.com'
Subject: FW: ARP00001061-SAF Holland semi-annual pretreatment report, July through December, 2023

From: Alan Anderson (adpce.ad)
Sent: Tuesday, January 30, 2024 11:04 AM
To: 'william.briant@safholland.com' <william.briant@safholland.com>
Subject: ARP00001061-SAF Holland semi-annual pretreatment report, July through December, 2023

Mr. Briant:

The July through December, 2023 semiannual pretreatment report for SAF Holland, Inc. North plant was received, reviewed, and deemed compliant with the requirements of 40 CFR § 403.12(e) and 40 CFR 433.17.

Thank you for the timely submittal of this report!

Alan Anderson, MPA | Pretreatment and Enforcement Coordinator
Division of Environmental Quality | **Office of Water Quality**
Enforcement Section

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0635 | c: 501.837.6954 | e: alan.anderson@example.com



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