

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 # _____

A. LEGAL NAME & MAILING ADDRESS

ESNA, LLC
611 Country Club Road
Pocahontas, Ark 72455

B. FACILITY & LOCATION ADDRESS

ESNA, LLC
611 Country Club Road
Pocahontas, Ark 72455

C. FACILITY CONTACT: **Jeff Bennett** TELEPHONE NUMBER: **870-892-4749** e-mail: **jbennett@esnaproducts.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: **Jan - 2019** TO: **June- 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

Passivate Rinse Tank

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.

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

C. Number of Regular Employees at this Facility
90

D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge*
Regulated (Core & Ancillary)	3337	4812	Continuous
Regulated (Cyanide)	N/A	N/A	N/A
' 403.6(e) Unregulated*	N/A	N/A	N/A
' 403.6(e) Dilute	92	132	Continuous
Cooling Water	N/A	N/A	N/A
Sanitary	1207	1128	Continuous
Total Flow to POTW	4656	6087	*****

*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 433.15 Pollutant(mg/l) limits	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*
Max for 1 day	0.672	2.696	3.290	.672	3.873	.418	2.540	1.168	2.073
Monthly Avg	.253	1.664	2.015	.418	2.316	.234	1.440	.632	--
Max Measured	.0099	.16	1.1	<.04	.46	<.007	.15	.013	N/A
Avg Measured**	.0099	.16	1.1	<.04	.46	<.007	.15	.013	N/A

Sample Location Pretreatment System Effluent
Sample Type (Grab* or Composite) Grab/Composite
If Grab sampled, list # of grabs over what period of time 12 over 24 hours and if composited by facility X or the certified lab .
Number of Samples and Frequency Collected 1 per Semi-Annual
40CFR136 Preservation and Analytical Methods Use: X Yes G 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.

Indicate Combined Wastestream Factor (include calculations) if dilution streams commingle with regulated process wastestream: .973

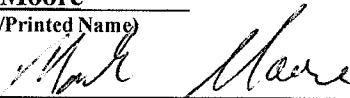
(6) CERTIFICATION (ONLY IF A TOMP HAS BEEN SUBMITTED/APPROVED BY ADEQ)

B. CHECK ONE: G '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED G '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.

Mark Moore

(Typed/Printed Name)



(Corporate Officer or authorized representative signature)

Date of Signature 6/10/19

(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. _____
2. _____
3. _____
4. _____
5. _____

(8) GENERAL COMMENTS

(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.

Mark Moore
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

General Manager
OFFICIAL TITLE

6/10/19
DATE SIGNED

ESNA
611 Country Club Road
Pocahontas, AR 72455

SAMPLE INFORMATION

Project Description:

Two (2) water sample(s) received on May 23, 2019
433 Report to ADEQ
P.O. No. 22-448-00

Receipt Details:

A Chain of Custody was provided. The samples were delivered in one (1) ice chest.
Ice chest #1 was delivered with shipping documentation.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

<u>Laboratory ID</u>	<u>Client Sample ID</u>	<u>Sampled Date/Time</u>	<u>Notes</u>
234703-1	16174	22-May-2019 1300	
234703-2	08206	22-May-2019 1300	

Qualifiers:

X Spiking level is invalid due to the high concentration of analyte in the spiked sample

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).
"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.
"Standard Methods for the Examination of Water and Wastewaters", (SM).
"American Society for Testing and Materials" (ASTM).
"Association of Analytical Chemists" (AOAC).

ESNA
611 Country Club Road
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ANALYTICAL RESULTS

AIC No. 234703-1

Sample Identification: 16174 22-May-2019 1300

Analyte		Result	RL	Units	Qualifier
Cadmium		0.0099	0.004	mg/l	
EPA 200.7	Prep: 24-May-2019 1106 by 100	Analyzed: 31-May-2019 1853 by 328		Batch: S47105	
Chromium		0.16	0.01	mg/l	
EPA 200.7	Prep: 24-May-2019 1106 by 100	Analyzed: 31-May-2019 1853 by 328		Batch: S47105	
Copper		1.1	0.01	mg/l	
EPA 200.7	Prep: 24-May-2019 1106 by 100	Analyzed: 31-May-2019 1853 by 328		Batch: S47105	
Lead		< 0.04	0.04	mg/l	
EPA 200.7	Prep: 24-May-2019 1106 by 100	Analyzed: 31-May-2019 1853 by 328		Batch: S47105	
Nickel		0.46	0.01	mg/l	
EPA 200.7	Prep: 24-May-2019 1106 by 100	Analyzed: 31-May-2019 1853 by 328		Batch: S47105	
Silver		< 0.007	0.007	mg/l	
EPA 200.7	Prep: 24-May-2019 1106 by 100	Analyzed: 31-May-2019 1853 by 328		Batch: S47105	
Zinc		0.15	0.01	mg/l	
EPA 200.7	Prep: 24-May-2019 1106 by 100	Analyzed: 31-May-2019 1853 by 328		Batch: S47105	

AIC No. 234703-2

Sample Identification: 08206 22-May-2019 1300

Analyte		Result	RL	Units	Qualifier
Total Cyanide		0.013	0.01	mg/l	
SM 4500-CN C,E 2011	Prep: 24-May-2019 1126 by 342	Analyzed: 28-May-2019 0916 by 342		Batch: W68246	

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: ESNA Products LLC
 Project Reference: 433 Request to ADEQ
 Project: _____
 Manager: _____
 Sampled By: Jeff Bennett / Chris Fisher
 AIC No. _____
 Identification No. _____
 Date/Time Collected: _____
 Container # 16174
 Composite # 5/21 - 5/22/19
3pm - 6pm
 Composite # 2
88206
3pm - 6pm

AIC No.	Sample Identification	Date/Time Collected	G	R	A	M	P	NO OF		ANALYSES REQUESTED	Remarks
								B	S		
1	Container # 16174	5/21 - 5/22/19 3pm - 6pm	X	X				1	1	Metals Cyanide	Metals on bottles: Cd, Cr, Cu, Pb, Ni, Zn, Ag
2	Container # 88206	5/21 - 5/22/19 3pm - 6pm	X	X				1	1		Composite Samples

G = Glass P = Plastic V = VOA vials H = HCl to pH2 T = Sodium Thiosulfate
 NO = none S = Sulfuric acid pH2 N = Nitric acid pH2 B = NaOH to pH12 Z = Zinc acetate
 A = (NH₄)₂SO₄, NH₄OH

Turnaround Time Requested: (Please circle)
 NORMAL or EXPEDITED IN _____ DAYS
 Expedited results requested by: _____
 Who should AIC contact with questions: _____
 Phone: 870 893 4749 Fax: _____
 Report Attention to: Jeff Bennett
Gill Gunnsky Club Rd. Pochonras AR 72455
 Email Address: jbennett@esnaproducts.com

Relinquished By: Jeff Bennett Date/Time: 5/22/19 3:30 pm
 Received By: David Bowden Date/Time: 22 MAY 19 2:30 pm
 Received in Lab By: AL341 Date/Time: 05-23-19

PO No. _____ NO OF BOTTLES _____
 MATRIX _____
 W _____ A _____ T _____ L _____
 S _____ O _____ L _____
 I _____ E _____ S _____
 R _____ E _____
 A _____ T _____
 M _____ O _____
 P _____ R _____

Received Temperature C
 Carrier: _____
 AIC CONTROL NO: 934705
 AIC PROPOSAL NO: _____

Field pH calibration on _____ @ _____
 Buffer: _____

Revised Temperature C _____
 Carrier: _____
 AIC CONTROL NO: _____
 AIC PROPOSAL NO: _____

Received in Lab By: AL341 Date/Time: 05-23-19

Box 1 S: 1BR T: 220
 220-1006
 1718314016009 9923 1030
 LAB0223BL DMGT Nov 22 22:29:28 2019
 LAB HIRPB 18.00. 202306

ESNA, LLC

Metals

24 Hour Composite

Sample #	Date	Time	Initials
1	5/21/19	3:02 pm	JB
2	5-21-19	5:05 PM	CF
3	5-21-19	7:00 PM	CF
4	5-21-19	9:03 PM	CF
5	5-21-19	11:05 PM	CF
6	5-22-19	1:00 AM	CF
7	5-22-19	2:55 AM	CF
8	5/22/19	5:02 AM	JB
9	5/22/19	7:00 AM	JB
10	5/22/19	9:10 AM	JB
11	5/22/19	10:55 AM	JB
12	5/22/19	1:13 AM	JB

Initials

Name

JB

Jeff Bennett

CF

Chris Foster

Take samples every 2 hours

Flush system for 1 minute