

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 # _____

<p>A. LEGAL NAME & MAILING ADDRESS</p> <p>ESNA 611 Country Club Road Pocahontas, Ark 72455</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p>ESNA 611 Country Club Road Pocahontas, Ark 72455</p>
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C. FACILITY CONTACT: Jeff Bennett **TELEPHONE NUMBER:** 870-892-4749 **e-mail:** jbenett@esnaproducts.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: July - 2018 TO: Dec.- 2018</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>Passivate Rinse Tank</u></p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</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>
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*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

<p>C. Number of Regular Employees at this Facility</p> <p><u>76</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 &	2355	3420	Continuous
Regulated (Cyanide)	N/A	N/A	N/A
' 403.6(e) Unregulated*	N/A	N/A	N/A
' 403.6(e) Dilute	66	95	Continuous
Cooling Water	N/A	N/A	N/A
Sanitary	4447	14927	Continuous
Total Flow to POTW	6880	18452	*****

*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	.671	2.695	3.288	.671	3.872	.418	2.539	1.167	2.072
Monthly Avg	.253	1.663	2.014	.418	2.315	.233	1.440	.632	--
Max Measured	.0055	.13	.57	<.04	.19	<.007	.11	.093	N/A
Avg Measured**	.0055	.13	.57	<.04	.19	<.007	.11	.093	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: 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.

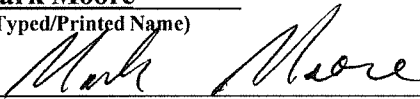
Indicate Combined Wastestream Factor (include calculations) if dilution streams commingle with regulated process wastestream: .973

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

B. CHECK ONE: '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED '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 12/20/18

(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(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.

Mark Moore
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

General Manager
OFFICIAL TITLE

12/20/18
DATE SIGNED



December 19, 2018
Control No. 229656
Page 1 of 5

ESNA
ATTN: Mr. Jeff Bennett
611 Country Club Road
Pocahontas, AR 72455

This report contains the analytical results and supporting information for the sample received on December 13, 2018. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Chief Operating Officer or a qualified designee.

A handwritten signature in black ink that reads 'Steve Bradford'. The signature is written in a cursive style and is positioned above a horizontal line.

Steve Bradford
Deputy Laboratory Director

This document has been distributed to the following:

PDF cc: ESNA
ATTN: Mr. Jeff Bennett
jbennett@esnaproducts.com



ESNA
611 Country Club Road
Pocahontas, AR 72455

SAMPLE INFORMATION

Project Description:

One (1) water sample(s) received on December 13, 2018
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>
229656-1	#09612, #23935	12-Dec-2018 1100	

Case Narrative:

There were no qualifiers for this data and all samples met quality control criteria.

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
Pocahontas, AR 72455

ANALYTICAL RESULTS

AIC No. 229656-1

Sample Identification: #09612, #23935 12-Dec-2018 1100

Analyte		Result	RL	Units	Qualifier
Total Cyanide		0.093	0.01	mg/l	
SM 4500-CN C,E 2011	Prep: 15-Dec-2018 0823 by 342	Analyzed: 15-Dec-2018 1506 by 326		Batch: W66420	
Cadmium		0.0055	0.004	mg/l	
EPA 200.7	Prep: 18-Dec-2018 1046 by 100	Analyzed: 18-Dec-2018 1519 by 235		Batch: S46296	
Chromium		0.13	0.01	mg/l	
EPA 200.7	Prep: 18-Dec-2018 1046 by 100	Analyzed: 18-Dec-2018 1519 by 235		Batch: S46296	
Copper		0.57	0.01	mg/l	
EPA 200.7	Prep: 18-Dec-2018 1046 by 100	Analyzed: 18-Dec-2018 1519 by 235		Batch: S46296	
Lead		< 0.04	0.04	mg/l	
EPA 200.7	Prep: 18-Dec-2018 1046 by 100	Analyzed: 18-Dec-2018 1519 by 235		Batch: S46296	
Nickel		0.19	0.01	mg/l	
EPA 200.7	Prep: 18-Dec-2018 1046 by 100	Analyzed: 18-Dec-2018 1519 by 235		Batch: S46296	
Silver		< 0.007	0.007	mg/l	
EPA 200.7	Prep: 18-Dec-2018 1046 by 100	Analyzed: 18-Dec-2018 1519 by 235		Batch: S46296	
Zinc		0.11	0.01	mg/l	
EPA 200.7	Prep: 18-Dec-2018 1046 by 100	Analyzed: 18-Dec-2018 1519 by 235		Batch: S46296	

ESNA
 611 Country Club Road
 Pocahontas, AR 72455

LABORATORY CONTROL SAMPLE RESULTS

<u>Analyte</u>	<u>Spike Amount</u>	<u>%</u>	<u>Limits</u>	<u>RPD</u>	<u>Limit</u>	<u>Batch</u>	<u>Preparation Date</u>	<u>Analysis Date</u>	<u>Dil</u>	<u>Qual</u>
Total Cyanide	0.1 mg/l	96.1	85.0-115			W66420	15Dec18 0827 by 342	15Dec18 1438 by 326		
Cadmium	2 mg/l	96.5	85.0-115			S46296	18Dec18 1053 by 100	18Dec18 1805 by 235		
Chromium	0.2 mg/l	102	85.0-115			S46296	18Dec18 1053 by 100	18Dec18 1805 by 235		
Copper	0.2 mg/l	97.0	85.0-115			S46296	18Dec18 1053 by 100	18Dec18 1805 by 235		
Lead	2 mg/l	102	85.0-115			S46296	18Dec18 1053 by 100	18Dec18 1805 by 235		
Nickel	0.2 mg/l	100	85.0-115			S46296	18Dec18 1053 by 100	18Dec18 1805 by 235		
Silver	0.04 mg/l	95.5	85.0-115			S46296	18Dec18 1053 by 100	18Dec18 1805 by 235		
Zinc	0.2 mg/l	100	85.0-115			S46296	18Dec18 1053 by 100	18Dec18 1805 by 235		

MATRIX SPIKE SAMPLE RESULTS

<u>Analyte</u>	<u>Sample</u>	<u>Spike Amount</u>	<u>%</u>	<u>Limits</u>	<u>Batch</u>	<u>Preparation Date</u>	<u>Analysis Date</u>	<u>Dil</u>	<u>Qual</u>
Total Cyanide	229610-9	0.1 mg/l	93.8	75.0-125	W66420	15Dec18 0827 by 342	15Dec18 1442 by 326		
	229610-9	0.1 mg/l	95.7	75.0-125	W66420	15Dec18 0827 by 342	15Dec18 1444 by 326		
	Relative Percent Difference:		2.01	20.0	W66420				
Cadmium	229656-1	2 mg/l	91.7	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1507 by 235		
	229656-1	2 mg/l	90.7	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1513 by 235		
	Relative Percent Difference:		1.09	20.0	S46296				
Chromium	229656-1	0.2 mg/l	95.0	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1507 by 235		
	229656-1	0.2 mg/l	93.5	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1513 by 235		
	Relative Percent Difference:		0.948	20.0	S46296				
Copper	229656-1	0.2 mg/l	100	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1507 by 235		
	229656-1	0.2 mg/l	94.6	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1513 by 235		
	Relative Percent Difference:		1.46	20.0	S46296				
Lead	229656-1	2 mg/l	95.5	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1507 by 235		
	229656-1	2 mg/l	96.0	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1513 by 235		
	Relative Percent Difference:		0.522	20.0	S46296				
Nickel	229656-1	0.2 mg/l	94.0	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1507 by 235		
	229656-1	0.2 mg/l	93.0	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1513 by 235		
	Relative Percent Difference:		0.539	20.0	S46296				
Silver	229656-1	0.04 mg/l	89.0	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1507 by 235		
	229656-1	0.04 mg/l	89.5	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1513 by 235		
	Relative Percent Difference:		0.560	20.0	S46296				
Zinc	229656-1	0.2 mg/l	95.8	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1507 by 235		
	229656-1	0.2 mg/l	95.3	75.0-125	S46296	18Dec18 1053 by 100	18Dec18 1513 by 235		
	Relative Percent Difference:		0.338	20.0	S46296				



ESNA
 611 Country Club Road
 Pocahontas, AR 72455

LABORATORY BLANK RESULTS

Analyte	Result	RL	PQL	QC Sample	Preparation Date	Analysis Date	Qual
Total Cyanide	< 0.01 mg/l	0.01	0.01	W66420-1	15Dec18 0827 by 342	15Dec18 1435 by 326	
Cadmium	< 0.004 mg/l	0.004	0.004	S46296-1	18Dec18 1053 by 100	18Dec18 1457 by 235	
Chromium	< 0.01 mg/l	0.01	0.01	S46296-1	18Dec18 1053 by 100	18Dec18 1457 by 235	
Copper	< 0.01 mg/l	0.01	0.01	S46296-1	18Dec18 1053 by 100	18Dec18 1457 by 235	
Lead	< 0.04 mg/l	0.04	0.04	S46296-1	18Dec18 1053 by 100	18Dec18 1457 by 235	
Nickel	< 0.01 mg/l	0.01	0.01	S46296-1	18Dec18 1053 by 100	18Dec18 1457 by 235	
Silver	< 0.007 mg/l	0.007	0.007	S46296-1	18Dec18 1053 by 100	18Dec18 1457 by 235	
Zinc	< 0.01 mg/l	0.01	0.01	S46296-1	18Dec18 1053 by 100	18Dec18 1457 by 235	



CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: ESNA Products		AIC CONTROL NO: 22036	
Project Reference: 433 Report to ADEQ		AIC PROPOSAL NO:	
Project Manager: Jeff Bennett / Chris Foster		Carrier: FE DA	
Sampled By: Jeff Bennett / Chris Foster		Received Temperature C 2.9	
AIC No.	Sample Identification	Date/Time Collected	Remarks
1	Container # 09612	12/11 - 12/12/18 1:00pm - 11:00am	Date: 12/11 - 12/12/18
2	Container # 23935	12/11 - 12/12/18 1:00pm - 11:00am	Date: 12/11 - 12/12/18
Every 2 Hr Compressive Sampling			
Field pH calibration on _____ @ _____ Buffer: _____			
Container Type: P		T = Sodium Thiosulfate	
Preservative: P		Z = Zinc acetate	
G = Glass		H = HCl to pH2	
NO = none		B = NaOH to pH12	
S = Sulfuric acid pH2		V = VOA vials	
		N = Nitric acid pH2	
Turnaround Time Requested: (Please circle) NORMAL or EXPEDITED IN 5 DAYS		Received Date/Time: 12 DEC 18	
Expedited results requested by:		By: Handy Bouchey	
Who should AIC contact with questions: Phone: 870 843 4749 Fax:		Received in Lab Date/Time: 12-13-18	
Report Attention to: Jeff Bennett		By: 02336	
Report Address to: 611 Country Club Road Poncha Springs AR 72455		Comments: #7739 52163714	
Email Address: jbennett@ESNAproducts.com			

ESNA

Metals

24 Hour Composite

Sample #	Date	Time	Initials
1	12/11/18	1:00 pm	B
2	12/11/18	3:00 pm	B
3	12/11/18	5:00 pm	CF
4	12/11/18	6:58 pm	CF
5	12/11/18	9:00 pm	CF
6	12/11/18	10:55 pm	CF
7	12/12/18	1:00 Am	CF
8	12/12/18	2:53 Am	CF
9	12/12/18	5:03 Am	B
10	12/12/18	7:00 Am	B
11	12/12/18	9:00 Am	B
12	12/12/18	11:00 Am	B

Initials

Name

B	Jeff Bennett
CF	Chris Foster

Take samples every 2 hours

Flush system for 1 minute