

Loethen, Katie

From: Loethen, Katie
Sent: Tuesday, August 3, 2021 10:24 AM
To: 'Mark Moore'
Cc: McWilliams, Carrie; Manasco, Barry
Subject: RE: ESNA Weir Report 433

Thank you for forwarding to me.

ESNA's June 2021 semiannual Pretreatment report was received, reviewed, and deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically in compliance with the Metal Finishing standards in 40 CFR 433.14 using the combined wastestream formula in 40 CFR 403.6.

No further action is deemed necessary at this time.
Best,

Katie Loethen | Wastewater Engineering Intern
Division of Environmental Quality | **Office of Water Quality**
Permits Branch

5301 Northshore Drive | North Little Rock, AR 72118
t: 501.683.3001 | e: Katie.loethen@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

From: Mark Moore [<mailto:mmoore@esnaproducts.com>]
Sent: Friday, July 30, 2021 11:45 AM
To: Loethen, Katie
Subject: FW: ESNA Weir Report 433

Here you go.

Thanks,
Mark

From: Mark Moore
Sent: Thursday, July 8, 2021 8:22 AM
To: Pretreatment-Submittals@adeq.state.ar.us
Subject: ESNA Weir Report 433

Attached is the 433 report for ESNA in Pocahontas, AR.

Thank you,

Mark Moore
ESNA
General Manager
611 Country Club Road
Pocahontas, AR 72455
1-870-892-4789
mmoore@esnaproducts.com

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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: Mark Moore **TELEPHONE NUMBER:** 870-892-4789 **e-mail:** mmoore@esnaproducts.com

(2) REPORTING PERIOD--FISCAL YEAR From _____ to _____ (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

July & January

B. PERIOD COVERED BY THIS REPORT

FROM: Jan- 2021 **TO:** June- 2021

(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
104

D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge*
Regulated (Core &	3825	5914	Continuous
Regulated (Cyanide)	N/A	N/A	N/A
' 403.6(e) Unregulated*	N/A	N/A	N/A
' 403.6(e) Dilute	105	162	Continuous
Cooling Water	N/A	N/A	N/A
Sanitary	1943	519	Continuous
Total Flow to POTW	5897	6614	*****

*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	.672	2.696	3.29	.672	3.874	.419	2.541	1.168	2.073
Monthly Avg	.253	1.664	2.015	.419	2.317	.234	1.441	.633	--
Max Measured	.004	.033	.55	<.04	.13	<.007	.068	<.01	N/A
Avg Measured**	.004	.033	.55	<.04	.13	<.007	.068	<.01	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)

Mark Moore

(Corporate Officer or authorized representative signature)

Date of Signature 7/8/21

(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

Mark Moore
SIGNATURE

General Manager
OFFICIAL TITLE

7/8/21
DATE SIGNED

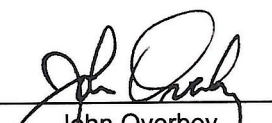


ESNA
ATTN: Mr. Mark Moore
611 Country Club Road
Pocahontas, AR 72455

This report contains the analytical results and supporting information for samples received on June 9, 2021. 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.



John Overbey
Chief Operating Officer

This document has been distributed to the following:

PDF cc: ESNA
ATTN: Mr. Mark Moore
mmoore@esnaproducts.com

ESNA
611 Country Club Road
Pocahontas, AR 72455

SAMPLE INFORMATION

Project Description:

Two (2) water sample(s) received on June 9, 2021
433 Report to ADEQ
P.O. No. 36862-00

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>
256105-1	C-1454	08-Jun-2021 1000	
256105-2	22201	08-Jun-2021 1000	

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).

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611 Country Club Road
Pocahontas, AR 72455

ANALYTICAL RESULTS

AIC No. 256105-1
Sample Identification: C-1454 08-Jun-2021 1000

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Cadmium EPA 200.7 Prep: 10-Jun-2021 1401 by 330	< 0.004 Analyzed: 10-Jun-2021 1709 by 328	0.004	mg/l Batch: S51144	
Chromium EPA 200.7 Prep: 10-Jun-2021 1401 by 330	0.033 Analyzed: 10-Jun-2021 1709 by 328	0.01	mg/l Batch: S51144	
Copper EPA 200.7 Prep: 10-Jun-2021 1401 by 330	0.55 Analyzed: 10-Jun-2021 1709 by 328	0.01	mg/l Batch: S51144	
Lead EPA 200.7 Prep: 10-Jun-2021 1401 by 330	< 0.04 Analyzed: 10-Jun-2021 1709 by 328	0.04	mg/l Batch: S51144	
Nickel EPA 200.7 Prep: 10-Jun-2021 1401 by 330	0.13 Analyzed: 10-Jun-2021 1709 by 328	0.01	mg/l Batch: S51144	
Silver EPA 200.7 Prep: 10-Jun-2021 1401 by 330	< 0.007 Analyzed: 10-Jun-2021 1709 by 328	0.007	mg/l Batch: S51144	
Zinc EPA 200.7 Prep: 10-Jun-2021 1401 by 330	0.068 Analyzed: 10-Jun-2021 1709 by 328	0.01	mg/l Batch: S51144	

AIC No. 256105-2
Sample Identification: 22201 08-Jun-2021 1000

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Total Cyanide SM 4500-CN C,E 2011 Prep: 09-Jun-2021 1427 by 356	< 0.01 Analyzed: 10-Jun-2021 1032 by 347	0.01	mg/l Batch: W76072	

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	86.0	64.0-120			W76072	09Jun21 1430 by 356	10Jun21 1030 by 347		
Cadmium	0.2 mg/l	95.6	85.0-115			S51144	10Jun21 1402 by 330	10Jun21 1701 by 328		
Chromium	0.2 mg/l	98.2	85.0-115			S51144	10Jun21 1402 by 330	10Jun21 1701 by 328		
Copper	0.2 mg/l	90.0	85.0-115			S51144	10Jun21 1402 by 330	10Jun21 1701 by 328		
Lead	2 mg/l	94.3	85.0-115			S51144	10Jun21 1402 by 330	10Jun21 1701 by 328		
Nickel	0.2 mg/l	97.2	85.0-115			S51144	10Jun21 1402 by 330	10Jun21 1701 by 328		
Silver	0.04 mg/l	97.6	85.0-115			S51144	10Jun21 1402 by 330	10Jun21 1701 by 328		
Zinc	0.2 mg/l	95.6	85.0-115			S51144	10Jun21 1402 by 330	10Jun21 1701 by 328		

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	256105-2	0.1 mg/l	83.7	66.3-113	W76072	09Jun21 1430 by 356	10Jun21 1033 by 347		
	256105-2	0.1 mg/l	84.5	66.3-113	W76072	09Jun21 1430 by 356	10Jun21 1035 by 347		
	Relative Percent Difference:		0.951	12.7	W76072				
Cadmium	256105-1	0.2 mg/l	90.5	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1704 by 328		
	256105-1	0.2 mg/l	88.4	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1706 by 328		
	Relative Percent Difference:		2.30	20.0	S51144				
Chromium	256105-1	0.2 mg/l	98.7	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1704 by 328		
	256105-1	0.2 mg/l	95.0	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1706 by 328		
	Relative Percent Difference:		3.23	20.0	S51144				
Copper	256105-1	0.2 mg/l	89.3	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1704 by 328		
	256105-1	0.2 mg/l	88.4	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1706 by 328		
	Relative Percent Difference:		0.265	20.0	S51144				
Lead	256105-1	2 mg/l	89.0	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1704 by 328		
	256105-1	2 mg/l	88.0	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1706 by 328		
	Relative Percent Difference:		1.07	20.0	S51144				
Nickel	256105-1	0.2 mg/l	91.6	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1704 by 328		
	256105-1	0.2 mg/l	88.7	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1706 by 328		
	Relative Percent Difference:		1.88	20.0	S51144				
Silver	256105-1	0.04 mg/l	92.8	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1704 by 328		
	256105-1	0.04 mg/l	90.6	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1706 by 328		
	Relative Percent Difference:		2.43	20.0	S51144				
Zinc	256105-1	0.2 mg/l	94.8	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1704 by 328		
	256105-1	0.2 mg/l	92.2	75.0-125	S51144	10Jun21 1402 by 330	10Jun21 1706 by 328		
	Relative Percent Difference:		2.01	20.0	S51144				

ESNA
611 Country Club Road
Pocahontas, AR 72455

LABORATORY BLANK RESULTS

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>LOQ</u>	<u>QC Sample</u>	<u>Preparation Date</u>	<u>Analysis Date</u>	<u>Qual</u>
Total Cyanide	< 0.0085 mg/l	0.0085	0.01	W76072-1	09Jun21 1430 by 356	10Jun21 1028 by 347	
Cadmium	< 0.002 mg/l	0.002	0.004	S51144-1	10Jun21 1402 by 330	10Jun21 1659 by 328	
Chromium	< 0.005 mg/l	0.005	0.01	S51144-1	10Jun21 1402 by 330	10Jun21 1659 by 328	
Copper	< 0.006 mg/l	0.006	0.01	S51144-1	10Jun21 1402 by 330	10Jun21 1659 by 328	
Lead	< 0.02 mg/l	0.02	0.04	S51144-1	10Jun21 1402 by 330	10Jun21 1659 by 328	
Nickel	< 0.005 mg/l	0.005	0.01	S51144-1	10Jun21 1402 by 330	10Jun21 1659 by 328	
Silver	< 0.004 mg/l	0.004	0.007	S51144-1	10Jun21 1402 by 330	10Jun21 1659 by 328	
Zinc	< 0.007 mg/l	0.007	0.01	S51144-1	10Jun21 1402 by 330	10Jun21 1659 by 328	

Shipping Order #:

10467

ESNA
A NOVARIA GROUP COMPANY
611 Country Club Road
Pocahontas, Arkansas 72455
(870) 892-5201

Date: 6/8/2021

Sold To
 AMERICAN INTERPLEX
 8600 KANIS ROAD
 LITTLE ROCK AR 72204

Ship To
 AMERICAN INTERPLEX
 8600 KANIS ROAD
 LITTLE ROCK AR 72204

Terms: PREPAID FOB: Carrier: FED EX EXP 1 PO#: Prepaid

Ordered	Shipped	ItemNumber	Description	Notes
	1		SAMPLES FOR TESTING	

IT IS UNDERSTOOD AND AGREED THAT CONSIGNEE ACCEPTS THE MATERIALS OR ARTICLES LISTED ABOVE SUBJECT TO THE TERMS AND CONDITIONS SPECIFIED HEREIN AND IN THE RELATED PURCHASE ORDER

IMPORTANT - Unless notified by consignee of any errors in quantities within 3 days after receipt, our count will be considered as final and conclusive.

All materials or articles shipped for processing, repair or construction work, unless charged to consignee, will be deemed to be held by consignee as upon consignment, and consignee agrees to pay for all articles or materials not satisfactorily accounted for.

DateOfShipment 6/8/2021	NumberOfContainers 1 PKG	Weight 19 #	ShippingDept: D. Boucher	CheckedBy:
ReleasingDept. BOUCHER/M MOORE	Class	ReceivedBy:		

Donald Boucher Signature 8 June 2021 Date