

**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: July- 2019      TO: Dec- 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**  
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 &	4227	5735	Continuous
Regulated (Cyanide)	N/A	N/A	N/A
' 403.6(e) Unregulated*	N/A	N/A	N/A
' 403.6(e) Dilute	116	157	Continuous
Cooling Water	N/A	N/A	N/A
Sanitary	1186	324	Continuous
<b>Total Flow to POTW</b>	<b>5554</b>	<b>6234</b>	*****

\*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	2.697	3.290	.672	3.874	.419	2.541	1.168	2.074
Monthly Avg	.253	1.665	2.015	.419	2.317	.234	1.441	.633	--
Max Measured	.0075	.061	.44	<.04	.11	<.007	.11	<.01	N/A
Avg Measured**	.0075	.061	.44	<.04	.11	<.007	.11	<.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: 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

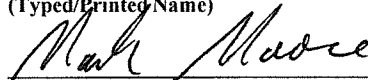
**(6) CERTIFICATION (ONLY IF A TOMP HAS BEEN SUBMITTED/APPROVED BY ADEQ)**

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 12/11/19

**(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

Mark Moore  
SIGNATURE

General Manager  
OFFICIAL TITLE

12/11/19  
DATE SIGNED

ESNA  
611 Country Club Road  
Pocahontas, AR 72455

**SAMPLE INFORMATION**

**Project Description:**

Two (2) water sample(s) received on November 8, 2019  
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>
239705-1	1-37964	07-Nov-2019 0700	
239705-2	2-19186	07-Nov-2019 0700	

**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. 239705-1**

**Sample Identification: 1-37964 07-Nov-2019 0700**

<b>Analyte</b>		<b>Result</b>	<b>RL</b>	<b>Units</b>	<b>Qualifier</b>
<b>Cadmium</b> EPA 200.7	Prep: 11-Nov-2019 0829 by 100	<b>0.0075</b> Analyzed: 13-Nov-2019 1428 by 328	<b>0.004</b>	<b>mg/l</b> Batch: S48034	
<b>Chromium</b> EPA 200.7	Prep: 11-Nov-2019 0829 by 100	<b>0.061</b> Analyzed: 12-Nov-2019 1855 by 328	<b>0.01</b>	<b>mg/l</b> Batch: S48034	
<b>Copper</b> EPA 200.7	Prep: 11-Nov-2019 0829 by 100	<b>0.44</b> Analyzed: 12-Nov-2019 1855 by 328	<b>0.01</b>	<b>mg/l</b> Batch: S48034	
<b>Lead</b> EPA 200.7	Prep: 11-Nov-2019 0829 by 100	<b>&lt; 0.04</b> Analyzed: 12-Nov-2019 1855 by 328	<b>0.04</b>	<b>mg/l</b> Batch: S48034	
<b>Nickel</b> EPA 200.7	Prep: 11-Nov-2019 0829 by 100	<b>0.11</b> Analyzed: 13-Nov-2019 1428 by 328	<b>0.01</b>	<b>mg/l</b> Batch: S48034	
<b>Silver</b> EPA 200.7	Prep: 11-Nov-2019 0829 by 100	<b>&lt; 0.007</b> Analyzed: 12-Nov-2019 1855 by 328	<b>0.007</b>	<b>mg/l</b> Batch: S48034	
<b>Zinc</b> EPA 200.7	Prep: 11-Nov-2019 0829 by 100	<b>0.11</b> Analyzed: 12-Nov-2019 1855 by 328	<b>0.01</b>	<b>mg/l</b> Batch: S48034	

**AIC No. 239705-2**

**Sample Identification: 2-19186 07-Nov-2019 0700**

<b>Analyte</b>		<b>Result</b>	<b>RL</b>	<b>Units</b>	<b>Qualifier</b>
<b>Total Cyanide</b> SM 4500-CN C,E 2011	Prep: 14-Nov-2019 0833 by 300	<b>&lt; 0.01</b> Analyzed: 15-Nov-2019 1035 by 300	<b>0.01</b>	<b>mg/l</b> Batch: W69896	



CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE 1 OF 1

Client: <b>ESNA Products LLC</b>		PO No.		ANALYSES REQUESTED		AIC CONTROL NO: <b>630701</b>	
Project Reference: <b>433 Report to ADEQ</b>		SAMPLE MATRIX		NO OF BOTTLES		AIC PROPOSAL NO:	
Project Manager: <b>Jeff Bennett / Chris Foster</b>		W A T E R		B O T T L E S		Carrier:	
Sample Identification		S O I L		V O A vials		Received Temperature C	
Date/Time Collected		G R A B		N = Nitric acid pH2		10	
11/6 - 11/7		C O M P		H = HCl to pH2		Remarks	
9 AM - 2 AM		X		B = NaOH to pH12		Every 2 Hour Composite Sample	
11/6 - 1/7		X		Relinquished			
9 AM - 7:00 AM		X		By: <b>Jeff Bennett</b>			
19186				Date/Time			
				11/7/19 9:15 AM			
				Date/Time			
				11-08-19			
				Relinquished			
				By: <b>AL341</b>			
				Date/Time			
				1005			
				Comments:			
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				By: <b>Janet Boucher</b>			
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ESNA, LLC

Metals

24 Hour Composite

Sample #	Date	Time	Initials
1	11/6/19	9:00 AM	B
2	11/6/19	11:05 AM	B
3	11/6/19	1:07 PM	B
4	11/6/19	3:00 PM	B
5	11/6/19	4:55 PM	B
6	11/6/19	7:00 PM	CF
7	11/6/19	9:05 PM	CF
8	11/6/19	11:00 PM	CF
9	11/7/19	1:00 AM	CF
10	11/7/19	2:55 AM	CF
11	11/7/19	5:02 AM	B
12	11/7/19	7:05 AM	B

Initials

Name

B	Jeff Bennett
CF	Chris Foster

Take samples every 2 hours

Flush system for 1 minute