

Gage, Hannah

From: Johnson, Lindsay
Sent: Tuesday, July 11, 2017 3:44 PM
To: 'mmoore@esnaproducts.com'
Cc: Yates, Adam; Leamons, Bryan; McWilliams, Carrie; Gage, Hannah; 'pocawater@suddenlinkmail.com'
Subject: AR0034835_ESNA ARP001048 late June 2017 semi annual Pretreatment report_20170711
Attachments: ESNA June 2017 report.pdf

Good Afternoon,

ESNA's late June 2017 semi-annual 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.

Sincerely,

*Lindsay Johnson
NPDES Staff Engineer
ADEQ-Office of Water Quality
(501)682-0045*

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>
<p>C. FACILITY CONTACT: Mark Moore TELEPHONE NUMBER: 870-892-4789 e-mail: mmoore@esnaproducts.com</p>	
(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: January - 2017 TO: June - 2017</p>
(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>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><small>*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS</small></p>	
<p>C. Number of Regular Employees at this Facility <u> 70 </u></p>	<p>D. [Reserved]</p>

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge*
Regulated (Core & Ancillary)	2364	3104	Continuous
Regulated (Cyanide)	N/A	N/A	N/A
' 403.6(e) Unregulated*	N/A	N/A	N/A
' 403.6(e) Dilute	67	87	Continuous
Cooling Water	N/A	N/A	N/A
Sanitary	2937	3648	Continuous
Total Flow to POTW	5380	6846	*****

*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	<.004	.47	.56	<.04	.22	<.007	.11	<.01	N/A
Avg Measured**	<.004	.47	.56	<.04	.22	<.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 1 over 24 hours and if composited by facility or the certified lab X.

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.

David Merwitz David D. Merwitz
(Typed/Printed Name)

[Signature]
(Corporate Officer or authorized representative signature)

Date of Signature 7/5/2017

(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.

David Merwitz
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

General Manager
OFFICIAL TITLE

7/5/2017
DATE SIGNED

Water from City			Total Process Flow to City				
Year	2017 Days	Gal. Avg	Flow Total	Year	2017 Days	Gal. Avg	Flow Total
Jan	34	5026	170900	Jan	30	3018	90528
Feb	28	6846	191700	Feb	30	2382	71468
Mar	28	6225	174300	Mar	28	3199	89569
Apr	30	5400	162000	Apr	30	2429	72864
May	33	4494	148300	May	31	2822	87480
Jun	29	4286	124300	Jun	31	806	24978
		Avg Flow	5380			Avg. Used	2443
		Max Flow	6846			Max Used	3199

1. Update months depending on 1st half or 2nd
2. Update days on calendar basis
3. Get water bills as outlined in call out
4. Flow meter reading to be taken and recorded by Maintenance Dept.

These are monthly readings from water bills. Water bills are located in Accounting department. Flow total column is only one that needs to be populated, rest will calculate.

These are monthly readings from flow meter at Weir (oil & water separation unit) located at Northeast corner of property. Reading to be taken first working day on or near the 8th day of each month.

Avg Flow for 1-1-17 to 6-30-17

1820 GPD	Passivate rinse tank - regulated		Water used from City
			5380 GPD
531 GPD	Rust Removal rinse tank - regulated		
		IN	OUT TO CITY
		2430 GPD	Aeration Mixing Basin
13 GPD	Product Deburring - regulated		2,443 GPD
63 GPD	Mop water - dilute		
1 GPD	Salt Spray blow down - dilute		Total Regulated = 2364 GPD
1 GPD	Lab - dilute		
1 GPD	Air compressor blow down - dilute		Total Dilute Flow = 67 GPD
1 GPD	Boiler blow down - dilute		
	Avg. Flow		
	Regulated Total	2364	
	Dilute	67	
	Sanitary	2937	
	Total Flow to POTW	5380	

Max Flow for 1-1-17 to 6-30-17

2387 GPD	Passivate rinse tank - regulated		Water used from City 6846 GPD
700 GPD	Rust Removal rinse tank - regulated		
		IN	OUT TO CITY
		3191 GPD	3,199 GPD
17 GPD	Product Deburring - regulated	Aeration Mixing Basin	
83 GPD	Mop water - dilute		
1 GPD	Salt Spray blow down - dilute		Total Regulated = 3104 GPD
1 GPD	Lab - dilute		
1 GPD	Air compressor blow down - dilute		Total Dilute Flow = 87 GPD
1 GPD	Boiler blow down - dilute		
	Avg. Flow		
	Regulated Total	3104	
	Dilute	87	
	Sanitary	3648	
	Total Flow to POTW	6846	

Waste Stream Factor

Total flow at Sample Point to City = Total Regulated + Total Dilute Flow

Combined wastestream factor is total regulated divided
by total flow at sample point

Flow Total at Sample Point	Minus	Diluted Flow	Divided by	Flow Total at Sample Point	Equals	Waste Stream Factor
2443			67	2443		0.973

PDES for All Plants Except Job Shops and Independent Printed Circuit Board Manufacturers		
Pollutant or pollutant property	Maximum for any 1 day Milligrams per liter (mg/l)	Monthly average shall not exceed
Cadmium (T)	0.69	0.26
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Silver (T)	0.43	0.24
Zinc (T)	2.61	1.48
Cyanide (T)	1.2	0.65
TTO	2.13	

Wastestream factor 0.973

Pollutant or pollutant property	Maximum for any 1 day Milligrams per liter (mg/l)	Monthly average shall not exceed
Cadmium (T)	0.671	0.253
Chromium (T)	2.695	1.663
Copper (T)	3.288	2.014
Lead (T)	0.671	0.418
Nickel (T)	3.872	2.315
Silver (T)	0.418	0.233
Zinc (T)	2.539	1.440
Cyanide (T)	1.167	0.632
TTO	2.072	

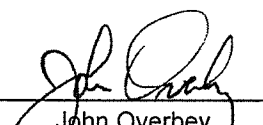


ESNA
ATTN: Mr. Mark Moore
611 Country Club Road
Pocahontas, AR 72455

This report contains the analytical results and supporting information for samples submitted on May 12, 2017. 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

Arkansas Testing Laboratories

3301 Langley Drive · Searcy, AR 72143 (501) 268-6431 f (844) 318-7030

NPDES Wastewater Monitoring
 Water and Wastewater Analysis
 Concrete, Asphalt, and Aggregate Testing
 Geotechnical Testing
 Industrial and Construction Quality Control

ESNA - MacLean

Collection Date: May 12, 2017
 Collection Time: 6:20 AM
 Collected By: MM PO 31912-00
 Collection Place: #003

Wastewater Analysis

Parameter	Analysis Begin		Results	Unit	Analyst	% Spike	Rel %	Sample Type	Ref #
	Date	Time							
TSS	05/18	3:30 PM	6.0	mg/l	IEW	NA	10.52	Grab	3
Oil & Grease	05/19	11:30 AM	1	mg/l	KLB	98.0	1.83	Grab	1
COD	05/18	11:10 AM	14	mg/l	KLB	102.8	0.00	Grab	2
Phosphorus	05/18	11:30 AM	1.94	mg/l	KLB	97.1	0.93	Grab	10
Nitrate / Nitrite	05/22	9:00 AM	0.15	mg/l	KLB	93.3	7.42	Grab	11
Aluminum	06/01	11:59 AM	0.133	mg/l	KLB	103.3	0.00	Grab	4
Iron	06/01	11:59 AM	0.155	mg/l	KLB	112.0	6.25	Grab	4
Zinc	06/01	11:59 AM	0.02	mg/l	KLB	110.6	12.66	Grab	4

Quality Assurance: All Parameters include 10% duplication studies by random selection. The following equipment is checked and calibrated daily: pH meter, balance, incubators, water baths, drying oven and sterilizing apparatus. Ammonia Nitrogen and Oil & Grease Analysis include duplication and spike studies at a rate of at least 10%.

Notes: Samples iced at collection. Preserved with H₂SO₄ to pH₂: Oil & Grease, Ammonia, COD

References:

Analysis complies with 40 CFR Part 136:

1. EPA 1664A Rev. B42
2. Hach 8000
3. SM 2540 D-1997
4. SM 3120 D-1999
10. SM 4500-P-E-1999
11. SM 4500-NO3-E-2000

Neville Adams, Manager

Arkansas Testing Laboratories

3301 Langley Drive
 Searcy, AR 72143
 Off 501-268-6431
 Fax 844-318 7030

*NPDES Wastewater Monitoring
 *Water and Wastewater Analysis
 *Concrete, Asphalt, and Aggregate Testing
 *Geotechnical Testing
 *Industrial and Construction Quality Control

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

CLIENT: ESNA						Permit #						PARAMETERS					
Location:												Calibration		PRESERVATIVES			
SAMPLE ID	SAMPLE MATRIX	SAMPLED BY: Mark Moore										pH #		ICE	H2SO4	H2SO4	HNO3
EFF	W=H2O	DATE	TIME		GRAB								TSS	COD N+N	O & G	Fe Al,Zn	
INF	S=SLUDGE	5/12/17	6:20 AM														
CLAR	D=SOIL																
POND	C=WELL																
BACKWASH																	
Outfall 003	W	x	x		X								1-L-P	1-125-P	1-L-G	1-125-P	
FE																	
Al																	
Zn																	
COD																	
N&N																	
TP																	
TSS																	
O+G																	
# = number of bottles		Q, L, H = Quart, Liter, Half Gallon				P, G = Plastic, Glass											
Relinquished by: Mark Moore		Date/Time: 5/12/17 6:45 AM				Received by: Samuel Baker		Date/Time: 12 MAY 17 6:50 AM									
Relinquished by: Samuel Baker		Date/Time: 12 MAY 3:07 PM				Received by: UPS		Date/Time: 5/12/17									
						Received by: Pam Green		Date/Time: 5/16/17 9:43 am									



ESNA
611 Country Club Road
Pocahontas, AR 72455

SAMPLE INFORMATION

Project Description:

Two (2) water sample(s) received on May 12, 2017
433 Report - 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>
212730-1	001	11-May-2017	1
212730-2	002	11-May-2017	1

Notes:

1. Sample label was incomplete in regard to date/time of sampling

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. 212730-1

Sample Identification: 001 11-May-2017

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Total Cyanide SM 4500-CN C,E 1999	< 0.01	0.01	mg/l	
Prep: 17-May-2017 0901 by 117	Analyzed: 17-May-2017 1612 by 321		Batch: W59849	

AIC No. 212730-2

Sample Identification: 002 11-May-2017

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Cadmium EPA 200.7	< 0.004	0.004	mg/l	
Prep: 15-May-2017 1307 by 313	Analyzed: 16-May-2017 1240 by 235		Batch: S43196	
Chromium EPA 200.7	0.47	0.007	mg/l	
Prep: 15-May-2017 1307 by 313	Analyzed: 16-May-2017 1240 by 235		Batch: S43196	
Copper EPA 200.7	0.56	0.006	mg/l	
Prep: 15-May-2017 1307 by 313	Analyzed: 16-May-2017 1240 by 235		Batch: S43196	
Lead EPA 200.7	< 0.04	0.04	mg/l	
Prep: 15-May-2017 1307 by 313	Analyzed: 16-May-2017 1240 by 235		Batch: S43196	
Nickel EPA 200.7	0.22	0.01	mg/l	
Prep: 15-May-2017 1307 by 313	Analyzed: 16-May-2017 1240 by 235		Batch: S43196	
Silver EPA 200.7	< 0.007	0.007	mg/l	
Prep: 15-May-2017 1307 by 313	Analyzed: 16-May-2017 1240 by 235		Batch: S43196	
Zinc EPA 200.7	0.11	0.004	mg/l	
Prep: 15-May-2017 1307 by 313	Analyzed: 16-May-2017 1240 by 235		Batch: S43196	