

Wilson, Tabatha

From: Gilliam, Allen
Sent: Wednesday, August 27, 2014 2:01 PM
To: Ryan, Will (WRyan@macleanfogg.com); dmerwitz@macleanfogg.com
Cc: Fuller, Kim; Wilson, Tabatha; pocawater@suddenlinkmail.com; Healey, Richard
Subject: AR0034835_MacLean ESNA ARP0001048 Aug 2014 late semi-annual report with ADEQ_20140827
Attachments: [Untitled].pdf

Will,

Mac-Lean ESNA's June 2014 semi-annual final corrected Pretreatment report (attached) was electronically received late, reviewed, deemed complete and compliant with the Metal Finishing standards in 40 CFR 433 using the combined wastestream formula (CWF) in 40 CFR 403.6(e).

Please ensure future reports are received by ADEQ before the end of your semi-annual reporting months of June and December of each year.

Thank you for your time and cooperation in settling on a valid/acceptable CWF factor. Please include the calculations for the basis of that factor in future reports.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: William Daniel, Pocahontas Wastewater Manager
Richard Healey, NPDES Enforcement Coordinator

E/NPDES/NPDES/Pretreatment/Reports

From: Ryan, Will [<mailto:WRyan@macleanfogg.com>]
Sent: Wednesday, August 27, 2014 1:31 PM
To: Gilliam, Allen
Subject: FW:

Please review. Hopefully this will be final version.

Regards,



Will K. Ryan | Plant Superintendent
MacLean-ESNA
611 Country Club Rd. Pocahontas, AR 72455
office.+ 870-892-4789 | cell. 870-378-7206

wryan@macleanfogg.com
www.macleanfoggcs.com

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433

Use of this form is not an EPA/ADEQ requirement.

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION

A. LEGAL NAME & MAILING ADDRESS

Mac-Lean ESNA
611 County Club Road
Pocahontas, AR 72455

B. FACILITY & LOCATION ADDRESS

Mac-Lean ESNA
611 County Club Road
Pocahontas, AR 72455

C. FACILITY CONTACT: Will Ryan

TELEPHONE NUMBER: 870-892-4789

e-mail: wryan@macleanfogg.com

(2) REPORTING PERIOD--FISCAL YEAR From 2011 to 2011 (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

June & December

B. PERIOD COVERED BY THIS REPORT

FROM: January 2014

TO: June 2014

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

CHECK EACH APPLICABLE BLOCK

- Electroplating
- Electroless Plating
- Anodizing
- Coating
- Chemical Etching and Milling
- Printed Circuit Board Manufacture

ANCILLARY PROCESS(ES)*

LIST BELOW EACH PROCESS USED IN THE FACILITY

- Rust Removal
- Passive 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.

Rust removal tank removed in April 2014

*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

C. Number of Regular Employees at this Facility: 72

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)	1468	1699	Continuous
Regulated (Cyanide)	0	0	N/A
' 403.6(e) Unregulated'	0	0	N/A
' 403.6(e) Dilute	71	82	Continuous
Cooling Water**	1130	1307	Continuous
Sanitary**	763	1240	Continuous
Total Flow to POTW	3362	4247	*****

***"Unregulated" has a precise legal meaning; see 40CFR403.6(c).

**Indicate if these Streams commingle with Regulated Streams BEFORE treatment

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

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.

Pollutant(mg/l)	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*
Max for 1 day	0.444	1.780	2.173	0.444	2.558	0.276	1.678	0.771	1.369
Monthly Ave	0.167	1.099	1.331	0.276	1.530	0.154	0.951	0.418	--
Max Measured	0.013	0.210	0.310	<0.04	0.310	<0.007	0.310	<0.01	TOMP
Ave Measured	0.013	0.210	0.310	<0.04	0.310	<0.007	0.310	<0.01	TOMP

Sample Location: Pretreatment system effluent

Sample Type (Grab or Composite): Grab/Composite

Number of Samples and Frequency Collected: One-Semi annually

40 CFR 136 Preservation and Analytical Methods Use: X Yes G No

Indicate Combined Wastestream Factor if Dilution Streams Exist w/Regulated Streams 0.643

(6) CERTIFICATION

A. Required under 40 CFR 403.12(g)

I certify under penalty of law that 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.

Dave Merwitz

(Typed Name)

D.M. F
(Corporate Officer or authorized representative)

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.

Dave Merwitz

(Typed Name)

D.M. F
(Corporate Officer or authorized representative)

Date of Signature 8/27/2017

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(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:

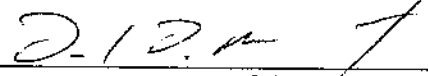
(8) GENERAL COMMENTS

(9) SIGNATORY REQUIREMENTS [40CFR403.12(f)]

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.

Dave Merwitz

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE



SIGNATURE

General Manager

OFFICIAL TITLE

8/27/2014

DATE SIGNED

Water from City		Total Process Flow to City					
Year	2014 Days	Gal. Avg	Flow Total	2014 Days	Gal. Avg	Flow Total	
Jan	31	2258	70000	31	2198	68153	
Feb	28	1854	51900	28	2408	67435	
Mar	31	2245	69600	31	2333	72312	
Apr	30	3077	92300	30	3281	98426	
May	31	3032	94000	31	2450	75965	
June	30	2697	80900	30	2921	87635	
		Avg Flow	2527	Avg. Used	2599		
		Max Flow	3077	Max Used	3281		

Avg Flow for 1-1-14 to 6-30-14

904 GPD	Well Water	Hydraulic Press non-contact cooling water - non-regulated dilution	
226 GPD		LepeI Induction Heater non-contact cooling water - non-regulated dilution	
890 GPD		Passivate rinse tank - regulated	
565 GPD	City Water	Rust Removal rinse tank - regulated	Water used from City 2527 GPD
14 GPD		Product Deburring - regulated	IN 1468 GPD Aeration Mixing Basin
67 GPD		Mop water - dilute	
1 GPD		Salt Spray blow down - dilute	Total Regulated = 1468 GPD
1.8 GPD		Lab - dilute	
1 GPD		Air compressor blow down - dilute	Total Dilute Flow = 1200 GPD
1 GPD		Boiler blow down - dilute	
		Avg. Flow	
		Regulated Total	1468
		Dilute	70.7
		Cooling Water	1130
		Sanitary	763
		Total Flow at Sample Point to POTW	3362

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	3362	Minus	Diluted Flow	1201	Divided by
					Flow Total at Sample
					Point
					Equals
					3362
					Waste Stream
					Factor
					0.643

PSES 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 0.643

Pollutant or pollutant property	Maximum for any 1 day Milligrams per liter (mg/l)	Monthly average shall not exceed
Cadmium (T)	0.444	0.167
Chromium (T)	1.780	1.099
Copper (T)	2.173	1.331
Lead (T)	0.444	0.276
Nickel (T)	2.558	1.530
Silver (T)	0.276	0.154
Zinc (T)	1.678	0.951
Cyanide (T)	0.771	0.418
TTO	1.369	

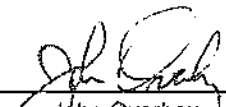


MacLean ESNA
ATTN: Mr. Steve Thielemier
611 Country Club Road
Pocahontas, AR 72455

This report contains the analytical results and supporting information for samples submitted on September 27, 2013. 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 Laboratory Director or a qualified designee.



John Overbey
Laboratory Director

This document has been distributed to the following:

PDF cc: MacLean ESNA
ATTN: Mr. Steve Thielemier
sthielemier@macleanfogg.com



MacLean ESNA
611 Country Club Road
Pocahontas, AR 72455

SAMPLE INFORMATION

Project Description:

Two (2) water sample(s) received on September 27, 2013
P.O. No. 25857-00

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>
170998-1	001 9-26-13 8:03am	26-Sep-2013 0803	1
170998-2	001 9-25-13 10:04am 9-26-13 10:00am	26-Sep-2013 1000	

Notes:

1. Received temperature of samples did not meet regulatory requirements

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", 21st edition.
- "American Society for Testing and Materials" (ASTM).
- "Association of Analytical Chemists" (AOAC).



MacLean ESNA
611 Country Club Road
Pocahontas, AR 72455

ANALYTICAL RESULTS

AIC No. 170998-1

Sample Identification: 001 9-26-13 8:03am

Analyte	Result	RL	Units	Qualifier
Total Cyanide SM 4500-CN C.E	< 0.01	0.01	mg/l	
Prep: 30-Sep-2013 1336 by 308	Analyzed: 01-Oct-2013 1624 by 308		Batch: W45091	

AIC No. 170998-2

Sample Identification: 001 9-25-13 10:04am 9-26-13 10:00am

Analyte	Result	RL	Units	Qualifier
Cadmium EPA 200.8	0.013	0.004	mg/l	
Prep: 27-Sep-2013 1314 by 305	Analyzed: 27-Sep-2013 1516 by 305		Batch: S35484	
Chromium EPA 200.8	0.21	0.007	mg/l	
Prep: 27-Sep-2013 1314 by 305	Analyzed: 27-Sep-2013 1516 by 305		Batch: S35484	
Copper EPA 200.8	0.31	0.005	mg/l	
Prep: 27-Sep-2013 1314 by 305	Analyzed: 27-Sep-2013 1516 by 305		Batch: S35484	
Lead EPA 200.8	< 0.04	0.04	mg/l	
Prep: 27-Sep-2013 1314 by 305	Analyzed: 27-Sep-2013 1516 by 305		Batch: S35484	
Nickel EPA 200.8	0.31	0.01	mg/l	
Prep: 27-Sep-2013 1314 by 305	Analyzed: 27-Sep-2013 1516 by 305		Batch: S35484	
Silver EPA 200.8	< 0.007	0.007	mg/l	
Prep: 27-Sep-2013 1314 by 305	Analyzed: 27-Sep-2013 1516 by 305		Batch: S35484	
Zinc EPA 200.8	0.31	0.002	mg/l	
Prep: 27-Sep-2013 1314 by 305	Analyzed: 27-Sep-2013 1516 by 305		Batch: S35484	

MacLean ESNA
611 Country Club Road
Pocahontas, AR 72455

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	0.1 mg/l	92.1	85.0-115			W45091	30Sep13 1336 by 305	01Oct13 1622 by 305		
Cadmium	0.05 mg/l	94.7	85.0-115			S35484	27Sep13 1035 by 305	27Sep13 1313 by 305		
Chromium	0.05 mg/l	95.8	85.0-115			S35484	27Sep13 1035 by 305	27Sep13 1313 by 305		
Copper	0.05 mg/l	101	85.0-115			S35484	27Sep13 1035 by 271	27Sep13 1313 by 305		
Lead	0.05 mg/l	98.1	85.0-115			S35484	27Sep13 1035 by 305	27Sep13 1313 by 305		
Nickel	0.05 mg/l	95.7	85.0-115			S35484	27Sep13 1035 by 305	27Sep13 1313 by 305		
Silver	0.02 mg/l	103	85.0-115			S35484	27Sep13 1035 by 305	27Sep13 1313 by 305		
Zinc	0.05 mg/l	104	85.0-115			S35484	27Sep13 1035 by 305	27Sep13 1313 by 305		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	170998-1	0.1 mg/l	89.8	75.0-125	W45091	30Sep13 1336 by 305	01Oct13 1626 by 305		
	170998-1	0.1 mg/l	101	75.0-125	W45091	30Sep13 1336 by 305	01Oct13 1628 by 305		
	Relative Percent Difference:		11.6	20.0	W45091				
Cadmium	170949-1	0.05 mg/l	90.7	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1318 by 305		
	170949-1	0.05 mg/l	90.7	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1323 by 305		
	Relative Percent Difference:		0.0926	20.0	S35484				
Chromium	170949-1	0.05 mg/l	93.8	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1318 by 305		
	170949-1	0.05 mg/l	94.4	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1323 by 305		
	Relative Percent Difference:		0.584	20.0	S35484				
Copper	170949-1	0.05 mg/l	91.3	75.0-125	S35484	27Sep13 1035 by 271	27Sep13 1318 by 305		
	170949-1	0.05 mg/l	92.2	75.0-125	S35484	27Sep13 1035 by 271	27Sep13 1323 by 305		
	Relative Percent Difference:		0.951	20.0	S35484				
Lead	170949-1	0.05 mg/l	92.8	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1318 by 305		
	170949-1	0.05 mg/l	93.2	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1323 by 305		
	Relative Percent Difference:		0.489	20.0	S35484				
Nickel	170949-1	0.05 mg/l	83.1	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1318 by 305		
	170949-1	0.05 mg/l	83.9	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1323 by 305		
	Relative Percent Difference:		0.945	20.0	S35484				
Silver	170949-1	0.02 mg/l	96.5	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1318 by 305		
	170949-1	0.02 mg/l	98.0	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1323 by 305		
	Relative Percent Difference:		1.49	20.0	S35484				
Zinc	170949-1	0.05 mg/l	87.7	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1318 by 305		
	170949-1	0.05 mg/l	87.2	75.0-125	S35484	27Sep13 1035 by 305	27Sep13 1323 by 305		
	Relative Percent Difference:		0.444	20.0	S35484				



MacLean ESNA
 611 Country Club Road
 Pocahontas, AR 72455

LABORATORY BLANK RESULTS

Analyte	Result	RL	FQL	QC	Preparation Date	Analysis Date	Quai
				Sample			
Total Cyanide	< 0.01 mg/l	0.01	0.01	W45091-1	30Sep13 1335 by 308	01Oct13 1620 by 308	
Cadmium	< 0.004 mg/l	0.004	0.004	S35484-1	27Sep13 1035 by 305	27Sep13 1307 by 305	
Chromium	< 0.007 mg/l	0.007	0.007	S35484-1	27Sep13 1035 by 305	27Sep13 1307 by 305	
Copper	< 0.006 mg/l	0.006	0.006	S35484-1	27Sep13 1035 by 271	27Sep13 1307 by 305	
Lead	< 0.04 mg/l	0.04	0.04	S35484-1	27Sep13 1035 by 305	27Sep13 1307 by 305	
Nickel	< 0.01 mg/l	0.01	0.01	S35484-1	27Sep13 1035 by 305	27Sep13 1307 by 305	
Silver	< 0.007 mg/l	0.007	0.007	S35484-1	27Sep13 1035 by 305	27Sep13 1307 by 305	
Zinc	< 0.002 mg/l	0.002	0.002	S35484-1	27Sep13 1035 by 305	27Sep13 1307 by 305	



CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: <u>MACLEAN / ESNA</u>		AIC Control No: <u>170498</u>	
Project Reference: _____		AIC Proposal No: _____	
Project Manager: _____		Carrier: _____	
Sampled By: <u>STEVE THIELEMER</u>		Received Temperature °C: <u>19.8</u>	
Remarks: _____		Remarks: _____	

AIC No.	Sample Identification	Date/Time Collected	Sample Matrix				No. of BOTTLES	Analyses Requested	Field pH calibration on Buffer
			W	A	S	L			
1	001	9-26-13 8:03 AM	X				1	ANALYSIS REQUESTED	
2	001	9-25-13 1:04 PM	X				1	ANALYSIS REQUESTED	
	001	9-26-13 10:00 AM	X				1	ANALYSIS REQUESTED	

Turnaround Time Requested: (Please circle) <u>(NORMAL) or EXPEDITED IN _____ DAYS</u>	Relinquished By: <u>Steve Thielmer</u> Date/Time: <u>9-26-13 9:08 AM</u>	Received By: <u>John Thacker</u> Date/Time: <u>9-26-13 9:09 AM</u>
Who should AIC contact with questions: Phone: <u>870-892-4161</u> Fax: _____	Relinquished By: _____ Date/Time: _____	Received in Lab By: <u>Steve Thielmer</u> Date/Time: <u>9-27-13 10:15</u>
Report Attention to: <u>STEVE THIELEMER</u>	Comments: _____	

12718 314035178 4919