

## Gage, Hannah

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**From:** Gilliam, Allen  
**Sent:** Wednesday, January 06, 2016 2:07 PM  
**To:** McLendon, Stanley (SMcLendon@macleanfogg.com); dave merwitz; Hufstedler, Cliff  
**Cc:** Gage, Hannah; 'pocawater@suddenlinkmail.com'  
**Subject:** AR0034835\_MacLean ESNA ARP001048 late Dec 2015 semi annual Pretreatment Report\_20160106  
**Attachments:** 24 hour Composite Log.pdf; 2015 Pretreatment Calculations July to Dec.xlsx; EMS WI.003.pdf; Environmental Action Items 12-28-15.docx; EMS 3.02.pdf; EMS 4.05.pdf; EMS 5.01.pdf; RT-200PI Calibration Record.pdf; R-197819.pdf; 433 SEMI ANNUAL PRETREATMENT REPORT JUN-NOV 2015 Revised.pdf  
**Importance:** High

Stan,

MacLean-ESNA's revised December 2015 semi-annual Pretreatment report "JUN-NOV" was received late, reviewed, replaced your initial incorrect semi-annual Pretreatment report (attached), satisfies the reporting requirements in 40 CFR 403.12(e) and more specifically is compliant with the Pretreatment standards in 40 CFR 433.15. No further actions are deemed necessary at this time.

Please continue to supply this office with your calculations regarding the dilution factor. MacLean-ESNA has historically accomplished this in a very legible manner and is lauded for its supporting calculations.

If there are further questions please feel free to contact this office.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

cc: William Daniel, City of Pocahontas Plant Manager

E/NPDES/NPDES/Pretreatment/Reports

\*\*\*\*\*on 1/4/16 Stan McLendon wrote:

Good Morning Allen,

Here is the corrected version.

I revised Section C under the Max Measured and Avg Measured with the data from the sample analysis results.

I did not have the word form of the report on my laptop and couldn't update the PDF form.

Since the plant was shut down and I don't have an alarm code or key I couldn't get back in to change it and resubmit until today.

Definitely good advice on the sample.

Please be critical as this is my first time reporting pre-treatment.

It has been challenging and a learning process for me.

Thank goodness I had some great help here.

Thank you for the best wishes for the New Year and I wish a prosperous New Year for you as well.

Respectfully, Stan

Stanley McLendon CSP  
Environmental Health & Safety Coordinator  
MacLean - ESNA  
611 Country Club Rd.  
Pocahontas, Arkansas 72455  
(870)892-5201 ext 4749  
[SMcLendon@macleanfogg.com](mailto:SMcLendon@macleanfogg.com)

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**From:** McLendon, Stanley [<mailto:SMcLendon@macleanfogg.com>]  
**Sent:** Wednesday, December 30, 2015 7:05 PM  
**To:** Gilliam, Allen  
**Cc:** Hufstedler, Cliff; Merwitz, David  
**Subject:** MacLean - ESNA Pretreatment Report  
**Importance:** High

Mr. Gilliam,  
Please accept the 2015 June thru November Pre-treatment report.  
My apology for getting this report at this late date.  
I will improve the timing of this report on the next reporting period.  
If you have any questions or concerns please contact me.

Respectfully, Stan

Stanley McLendon CSP  
Environmental Health & Safety Coordinator  
MacLean - ESNA  
611 Country Club Rd.  
Pocahontas, Arkansas 72455  
(870)892-5201 ext 4749  
[SMcLendon@macleanfogg.com](mailto:SMcLendon@macleanfogg.com)

Sample #	Date	Time	Initials
1	12/28/2015	12:03 pm	SM
2	12/28/2015	2:03 pm	SM
3	12/28/2015	4:06 pm	SM
4	12/28/2015	6:01 pm	SM
5	12/28/2015	8:04 PM	CF
6	12/28/2015	10:02 PM	CF
7	12/29/2015	12:01 AM	CF
8	12/29/2015	2:05 AM	CF
9	12/29/2015	4:00 AM	CF
10	12/29/2015	6:04 AM	SM
11	12/29/2015	8:03 AM	SM
12	12/29/2015	10:00 AM	SM
SM	Stan McLendon	SM	
CF	Chris Foster	CF	
Take samples every 2 hours			
Flush system for 1 minute			

Water from City			Total Process Flow to City				
Year	2015 Days	Gal. Avg	Flow Total	Year	2015 Days	Gal. Avg	Flow Total
June	30	4360	130800	June	30	5465	163960
July	31	5394	167200	July	31	5340	165528
Aug	28	3204	89700	Aug	28	3172	88803
Sept	31	4368	135400	Sept	31	4280	132689
Oct	30	4020	120600	Oct	30	4423	132689
Nov	31	4903	152000	Nov	31	6415	198858
		Avg Flow	4375			Avg. Used	4849
		Max Flow	5394			Max Used	6415

\*\*  
\*\*  
\*

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 of each month.

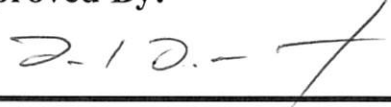
1. Update months depending on 1st half or 2nd half report
2. Update days on calendar basis
3. Get water bills as outlined in call out
4. Flow meter reading to be taken and recorded by Maintenance Dept.

\* New flow meter installed 11/13/2015 on Wier  
Previous meter was designed for Gallons per minute (GPM)

Nov 1-13	Avg	86172	*	13 days
Nov 14-30	Actual	112686	*	6629 17 days
	Total	198858	*	

\*\*\*\* New EHS Coordinator started and reporting on 11/9/2015

Process	Flow to City
<b>Averaged 5 month</b>	
April	122576
May	122576
June	163960
July	165528
August	88803
**	<b>132689</b>
No readings recorded during Sept. and Oct.	

<b>MACLEAN - ESNA A MacLean-Fogg Company</b>	<b>EMS WI.003</b>	<b>Page 1 of 2</b>
<b>EMS Work Instruction</b>	<b>Rev. 2</b>	<b>Date: 03/23/2015</b>
<b>Title: Wastewater Treatment - Weir</b>		<b>Originator: Steve Theilemier</b>
		<b>Reviewed By: Eric White</b> <i>EW</i>
<b>File Location:</b> <b>X:\Common\Environmental Records\Word Docs</b>		<b>Approved By:</b> 

### 1.0 Purpose

1.1 To define and control the semi-annual collection of samples of effluent outfall to city to comply with state of Arkansas Industrial Pretreatment waste discharge.

### 2.0 References

2.1 State of Arkansas Industrial Pretreatment Report

### 3.0 Responsibilities

3.1 Maintenance Supervisor

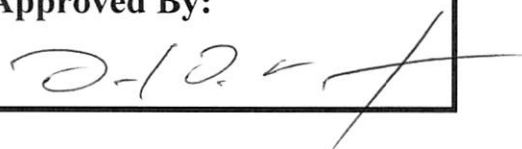
### 4.0 Instructions

- 4.1 During the months of May and November, an effluent 24-hour composite sample shall be taken from city discharge at the sampling point at weir.
- 4.2 A sample kit containing a cooler and sample containers are obtained from an outside laboratory.
- 4.3 The sample collection container and cooler with ice are taken to the weir.
- 4.4 A sample is collected every two hours for a period of 24 hours. The date and time of each sample is recorded on a log sheet.
- 4.5 A chain of custody/analysis request form and shipping order form is filled out. Sample containers are filled from the sample collected from the 24-hour composite and placed in cooler with ice for shipping.
- 4.6 The samples are shipped to an outside laboratory for testing.
- 4.7 The laboratory will then send the test results and the chain of custody/analysis form back to the Maintenance Supervisor.
- 4.8 The Maintenance Supervisor will forward a copy of the results to the Engineering Manager.
- 4.9 The Engineering Manager will forward this copy to an outside consultant who will prepare the Industrial Pretreatment Report for the State of Arkansas Department of Environmental Quality.
- 4.10 The completed report is forwarded back to the Engineering Manager. He then will take it to the principal executive officer for his signature.
- 4.11 The Engineering Manager will keep a copy on file and forward the original to State of Arkansas Department of Environmental Quality.

### 5.0 Records

- 5.1 24-hour Composite Log
- 5.2 Laboratory Test Results

*Highlighted area denotes changes.  
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<b>MACLEAN - ESNA A MacLean-Fogg Company</b>	<b>EMS WI.003</b>	<b>Page 2 of 2</b>
<b>EMS Work Instruction</b>	<b>Rev. 2</b>	<b>Date: 03/23/2015</b>
<b>Title: Wastewater Treatment - Weir</b>		<b>Originator: Steve Theilemier</b>
		<b>Reviewed By: Eric White</b>
<b>File Location: X:\Common\Environmental Records\Word Docs</b>		<b>Approved By:</b> 

- 5.3 Chain of Custody/Analysis Request Form
- 5.4 State of Arkansas Industrial Pretreatment Report

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#### Action Item #1

#### Finding:

The 433 Semi-Annual Pre-Treatment document and all related documents were not placed in the document control file as required per EMS procedure 4.05 Documents and Records Control.

#### Root Cause

- No documentation of submitted files was placed in document control to verify previous submissions

#### Immediate Corrective Action Taken

- 2015 January – June submission placed in document control system

#### Root Cause of Nonconformance:

- Required documents were not placed in Document control system
- Reporting period requirements need to be updated to meet reporting period submission, for example reporting period is Jan – June and July – December should be changed to December thru May and June thru November. Report submission should occur in December and June.

#### Impact of all Identified Causes and the Root Cause

- Prevention of all documents being submitted or used for documentation in duplication

#### Action to Prevent Recurrence:

- Ensure previous and current reporting period submission is in place in document control files

Effective Date:

Immediate

## Action Item #2

### Finding:

Flow meter was not a totalizer and was only recording gallons per minute (GPM) as required per EMS procedure 5.01 Monitoring and Measurements

### Root Cause

- Installed flow meter was not accumulating total gallons of wastewater going to the city

### Immediate Corrective Action Taken

- Installed new calibrated totalizer flow meter on November 13, 2015.
- Measured flow meter results from November 13, 2015 thru December 1, 2016.
- Averaged November 1 thru November 12, 2015 readings. See spreadsheet.
- Add new totalizer flow meter for purchase in March, 2016.

### Root Cause of Nonconformance:

- Flow meter was recording gallons per minute (gpm), couldn't change to totalizer.
- No GPM data recorded or calculated to accumulate total.

### Impact of all Identified Causes and the Root Cause

- Unable to obtain September and October 2015 readings

### Action to Prevent Recurrence:

- Purchase new calibrated totalizer flow meter in March, 2016.
- This new flow meter will serve as a back- up flow meter
- Add flow meters to calibration database

### Effective Date:

November 13, 2015



<b>MACLEAN - ESNA A MacLean-Fogg Company</b>	<b># EMS 3.02</b>	<b>Page 1 of 3</b>
<b>EMS Procedure</b>	<b>Rev. 4</b>	<b>Date: 3/26/2015</b>
<b>Title: Legal and Other Requirements</b>		<b>Originator: Donnie Autry</b>
		<b>Reviewed By: Eric White</b> <i>W</i>
<b>File Location: X:\Common\Environmental Records\Word Docs</b>		<b>Approved By:</b> <i>D. J. L.</i>

## 1.0 Purpose

To provide a methodology for identifying, providing access to, reviewing and maintaining a list of applicable facility Environmental Legal and Other Requirements related to facility operations, including, but not limited to, identified facility actual and potential Environmental Aspects.

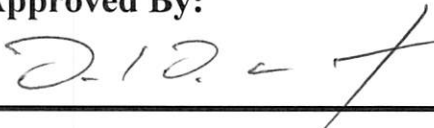
## 2.0 References

- 2.1 Procedure EMS 4.05: Documents and Records Control
- 2.2 Form EMS 3.02.F1: Environmental Legal and Other Requirements Summary List
- 2.3 Appendix E: Environmental Documents and Records Index

## 3.0 Requirements

The **EHS Coordinator** or designee shall:

- 3.1 Identify the Environmental Legal and Other Requirements applicable to facility operations, and list them on Form EMS 3.02.F1. **EHS Coordinator** or designee will insure that Form EMS 3.02.F1 is kept current and up to date through:
  - 3.1.1 Environmental Consultant
  - 3.1.2 US EPA Web Page ([www.EPA.gov](http://www.EPA.gov))
  - 3.1.3 Arkansas Department of Environmental Quality (ADEQ) Web page
  - 3.1.4 Arkansas Environmental Federation
- 3.2 Establish an on-site file with paper and/or electronic copies of facility Environmental Legal and Other Requirements listed on Form EMS 3.02.F1.
- 3.3 Provide reasonable access to the facility Environmental Legal and Other Requirements listed on Form EMS 3.02.F1 to facility employees and contractors having job responsibilities relating to them. EMS related documents will be available through the Engineering Manager, EMS Coordinator or designee.

<b>MACLEAN - ESNA A MacLean-Fogg Company</b>	<b># EMS 3.02</b>	<b>Page 2 of 3</b>
<b>EMS Procedure</b>	<b>Rev. 4</b>	<b>Date: 3/26/2015</b>
<b>Title: Legal and Other Requirements</b>		<b>Originator: Donnie Autry</b>
		<b>Reviewed By: Eric White</b> <i>un</i>
<b>File Location: X:\Common\Environmental Records\Word Docs</b>		<b>Approved By:</b> 

- 3.4 Maintain completed facility Form EMS 3.02.F1 required by Sections 3.1, 3.2 and 3.3 of this procedure and relevant environmental legislation and regulations by regularly reviewing relevant information provided by periodicals and other services, governmental agency notices and other relevant sources for compliance.
- 3.5 Maintain records evidencing that the completed facility Form EMS 3.02.F1 is being maintained. They must be controlled in accordance with Procedure EMS 4.05.
- 3.6 Maintain records evidencing a yearly audit ensuring compliance to applicable legal requirements.
- 3.7 Maintain Form EMS 3.02.F3 evidencing compliance with other requirements to which MacLean-ESNA subscribes. Evaluations shall be done on a yearly basis.
- 3.8 Establish and maintain a current indexed and organized file of all facility permits and relevant supporting information, e.g., permit applications, reports to regulatory agencies, monitoring data, engineering assumptions and calculations, process chemistry, mass balances, confirmation tests, etc. All of these documents and records shall be controlled and maintained in accordance with Procedure EMS 4.05. All permits in this file shall be referenced in the EMS Documents and Records Index in Appendix E of this manual next to Environmental Legal and Other Requirements entries.
- 3.9 Maintain Form EMS 3.02.F2 evidencing a weekly inspection of the facility ensuring compliance with the requirements to which MacLean-ESNA subscribes.

#### **4.0 Maintenance and Revisions**

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<b>EMS Procedure</b>	<b>Rev. 4</b>	<b>Date: 3/26/2015</b>
<b>Title: Legal and Other Requirements</b>		<b>Originator: Donnie Autry</b>
		<b>Reviewed By: Eric White</b> <i>EW</i>
<b>File Location:</b> <b>X:\Common\Environmental Records\Word Docs</b>		<b>Approved By:</b> <i>D. J. [Signature]</i>

4.1 At least annually, this procedure and Form EMS 3.02.F1 shall be reviewed for compliance with legal requirements and, when necessary, revised.

## 5.0 Records

- 5.1 EMS 3.02.F1
- 5.2 EMS 3.02.F2
- 5.3 EMS 3.02.F3

<b>MACLEAN - ESNA A MacLean-Fogg Company</b>	<b># EMS 4.05</b>	<b>Page 1 of 3</b>
<b>EMS Procedure</b>	<b>Rev. 5</b>	<b>Date: 03/27/2015</b>
<b>Title: Document and Record Control</b>		<b>Originator: Donnie Autry</b>
		<b>Reviewed By: Eric White</b> <i>w</i>
<b>File Location: X:\Common\Environmental Records\Word Docs</b>		<b>Approved By:</b> <i>D. J. - f</i>

### 1.0 Purpose

To provide a methodology for assuring EMS documents and records are properly originated, modified, maintained, disposed of and otherwise controlled and effectively managed.

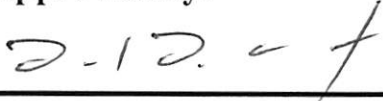
### 2.0 References

- 2.1 Procedure EMS 1.00: Introduction
- 2.2 Procedure EMS 4.04: System Documentation
- 2.3 Procedure EMS Appendix E: Environmental Documents and Records Index

### 3.0 Requirements

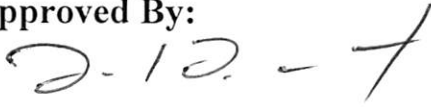
- 3.1 Current site EMS documents, whether of internal or external origin, shall be:
  - 3.1.1 Readily identifiable, locatable and accessible to appropriate personnel having job responsibilities to which they relate
  - 3.1.2 Legible, dated (with dates of revision) and properly protected
  - 3.1.3 Maintained in an orderly manner and retained for specified time periods
  - 3.1.4 Created, modified and approved for adequacy by authorized facility employees with defined responsibilities
  - 3.1.5 Periodically reviewed and, when necessary, revised
  - 3.1.6 Disposed of when they become obsolete, from all points of use
  - 3.1.7 Suitably secured when designated as confidential, such as attorney/client privileged documents

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<b>MACLEAN - ESNA A MacLean-Fogg Company</b>	<b># EMS 4.05</b>	<b>Page 2 of 3</b>
<b>EMS Procedure</b>	<b>Rev. 5</b>	<b>Date: 03/27/2015</b>
<b>Title: Document and Record Control</b>		<b>Originator: Donnie Autry</b>
		<b>Reviewed By: Eric White</b>
<b>File Location: X:\Common\Environmental Records\Word Docs</b>		<b>Approved By:</b> 

- 3.1.8 Any obsolete documents retained for legal and/or knowledge preservation purposes are moved into the records file and will be controlled as a record
- 3.1.9 Otherwise effectively and efficiently controlled and managed
- 3.2 Site EMS records shall be:
  - 3.2.1 Readily identifiable, retrievable and traceable to the activity or service to which they relate
  - 3.2.2 Located close to appropriate personnel having job responsibilities to which they relate and/or Environmental Coordinator's files
  - 3.2.3 Legible and dated with established and recorded retention times, which shall generally be three years or retention times required by law, whichever is longer
  - 3.2.4 Protected against damage, deterioration and loss
  - 3.2.5 Kept in files as long as active life of the facility – when their retention times expire. Disposed of with supporting recommendation of a lawyer for possible storage and retention after facility active life.
  - 3.2.6 Suitably secured when designated as confidential, such as attorney/client privileged records
  - 3.2.7 Sufficient to demonstrate conformance with facility EMS requirements
  - 3.2.8 Otherwise effectively and efficiently controlled and managed
- 3.3 EMS documents should be created or modified substantively by the EMS Coordinator. Any facility employee seeking a substantive modification of an existing facility EMS document or the creation of a new facility EMS document may initiate a Document Creation or Change request, Form QAF 18.

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MACLEAN - ESNA A MacLean-Fogg Company	# EMS 4.05	Page 3 of 3
EMS Procedure	Rev. 5	Date: 03/27/2015
Title: Document and Record Control		Originator: Donnie Autry
		Reviewed By: Eric White <span style="float: right;">wr</span>
File Location: X:\Common\Environmental Records\Word Docs	Approved By: 	

3.3.1 EHS Coordinator may make editorial revisions of facility EMS documents without top management approval. EMS documents that are created or modified shall be reviewed and approved by the General Manager or the Director of Operations. The EHS Coordinator or the manager of appropriate department can approve environmental Work Instructions.

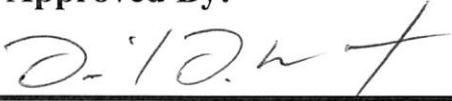
3.3.2 Location and responsibility changes outside of Top Management does not require approval

#### 4.0 Maintenance and Revisions

4.1 At least annually, this procedure shall be reviewed and, when necessary, revised.

#### 5.0 Records

5.1 None

<b>MACLEAN - ESNA A MacLean-Fogg Company</b>	<b># EMS 5.01</b>	<b>Page 1 of 3</b>
<b>EMS Procedure</b>	<b>Rev. 2</b>	<b>Date: 03/27/2015</b>
<b>Title: Monitoring and Measurements</b>		<b>Originator: Donnie Autry</b>
		<b>Reviewed By: Eric White</b> <i>mw</i>
<b>File Location: X:\Common\Environmental Records\Word Docs</b>		<b>Approved By:</b> 

## 1.0 Purpose

To provide a methodology for monitoring and measuring on a regular basis facility Environmental performance, including the performance of key characteristics of facility operations, which can have Significant Environmental Impacts, and for periodically evaluating compliance with relevant environmental legislation and regulations.

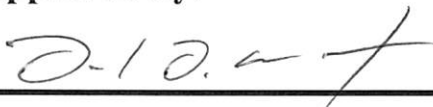
## 2.0 References

- 2.1 Procedure EMS 3.01: Aspects and Operational Controls
- 2.2 Procedure EMS 3.02: Legal and Other Requirements (Section 3.4)
- 2.3 Procedure EMS 3.03: Objectives and Targets
- 2.4 Procedure EMS 3.04: Environmental Management Programs
- 2.5 Procedure EMS 4.05: Documents and Records Control
- 2.6 Procedure EMS 4.06.01: Purchasing, Contractor & Visitor Management
- 2.7 Procedure EMS 6.00: Management Review
- 2.8 Form EMS 3.02.F1: Environmental Legal & Other Requirements Summary List

## 3.0 Requirements

- 3.1 The following shall be monitored and measured on a regular basis and the resulting data properly recorded by the EHS Coordinator:
  - 3.1.1 Key Characteristics of facility operations, which can have Significant Environmental Impacts, which have been identified under Procedure EMS 3.01
  - 3.1.2 Achievement of facility Environmental Objectives and Targets established under Procedure EMS 3.03 and status of related Environmental Management Programs approved under Procedure EMS 3.04
  - 3.1.3 Other areas of facility Environmental performance designated by the top management

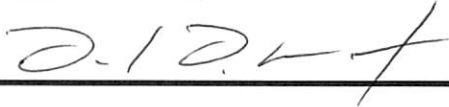
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<b>MACLEAN - ESNA A MacLean-Fogg Company</b>	<b># EMS 5.01</b>	<b>Page 2 of 3</b>
<b>EMS Procedure</b>	<b>Rev. 2</b>	<b>Date: 03/27/2015</b>
<b>Title: Monitoring and Measurements</b>		<b>Originator: Donnie Autry</b>
		<b>Reviewed By: Eric White</b> <i>uw</i>
<b>File Location:</b> <b>X:\Common\Environmental Records\Word Docs</b>		<b>Approved By:</b> 

- 3.2 Environmental performance indicators shall be established by the EHS Coordinator, where practical, for each Environmental Management Program established under Procedure EMS 3.04 for achievement of facility Environmental Objectives and Targets established under Procedure EMS 3.03.
- 3.3 The EHS Coordinator or his/her designee shall assure that site Environmental-monitoring equipment is calibrated and maintained and records evidencing these processes are retained in accordance with Procedure EMS 4.05.
- 3.4 The Top Management shall assure that Environmental performance excellence of site employees is duly recognized as part of their overall performance evaluations and by other appropriate means.
- 3.5 The EHS Coordinator shall use the results of monitoring and measurement required by this procedure when he or she reports to the top management on facility EMS performance during Management Reviews conducted under Procedure EMS 6.00, and on other appropriate occasions.
- 3.6 The Environmental Coordinator or environmental consultant shall at least annually evaluate compliance with relevant legislation and regulations. For the proper evaluation of relevant legislation and regulations the Environmental Coordinator or environmental consultant shall:
- 3.6.1 Review Procedure EMS 3.02 for accuracy
- 3.6.2 Review all of the relevant legal and other requirement listed on Form EMS 3.02.F1
- 3.6.3 Follow new law requirements/regulations through Environmental Compliance Newsletter and where the changes are appropriate to facility activities follow element 3.6.6 of this section

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<b>MACLEAN - ESNA A MacLean-Fogg Company</b>	<b># EMS 5.01</b>	<b>Page 3 of 3</b>
<b>EMS Procedure</b>	<b>Rev. 2</b>	<b>Date: 03/27/2015</b>
<b>Title: Monitoring and Measurements</b>		<b>Originator: Donnie Autry</b>
		<b>Reviewed By: Eric White</b> <i>ew</i>
<b>File Location:</b> <b>X:\Common\Environmental Records\Word Docs</b>		<b>Approved By:</b> 

- 3.6.4 Review activities in facility's operational controls (follow Procedure EMS 4.06.01) for assuring that possible changes are not in conflict in current regulations, if so follow element 3.6.6 of this section
- 3.6.5 Implement and maintain new legislation and regulations, which apply to the facility then change Form EMS 3.02.F1 to reflect new requirements.
- 3.6.6 Verify applicable permits and/or other relevant documents/records for compliance and communication between MacLean-ESNA and interested parties; issue corrective action (follow Procedure EMS 5.02) if discrepancies would be discovered
- 3.6.7 Verify all other requirements (IMDS, etc.), and implement any new requirements that are subscribed to

**4.0 Maintenance and Revisions**

- 4.1 At least annually, this procedure shall be reviewed and, when necessary, revised.

**5.0 Records**

- 5.1 None

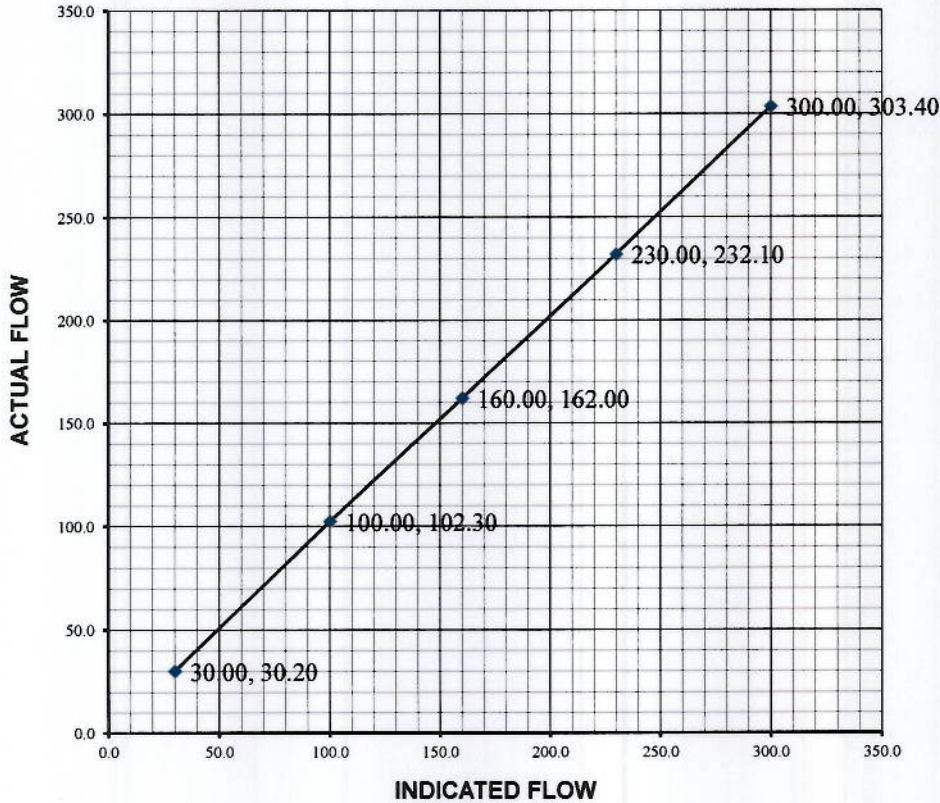
**Customer Name:** MacLean-Fogg  
**Flowmeter Model No.:** RT-200PI-GPM1  
**Flowmeter Serial No.:** 51407-0800  
**Flow Range:** 30 - 300 GPM

**CERT. No.:** 091115-01  
**Order Number:** 23543

<b>Data condition</b>	<b>Calibration Date</b>	<b>Calibration Due</b>	<b>Calibration Technician</b>
As found/ As left	9/11/2015	9/11/2016	J. WOOLARD
<b>Rated Accuracy:</b> +/- 2% of F.S.	<b>Ambient pressure:</b> 14.7 PSIA	<b>Test Fluid Type:</b> Water, S.G. = 1	
<b>Customer's Fluid Sp.Gr.:</b> 1.000 (Liquid)	<b>Ambient Temp:</b> 72 DEG. F	<b>Test Fluid Temp:</b> 75 DEG. F	

Indicated Flow cust. LIQUID (GPM)	Actual Flow test Water (GPM)	Calc. Actual Flow cust. LIQUID (GPM)	%Deviation of F.S.	Data Condition Status
300.00	303.40	303.40	-1.13%	in tolerance
230.00	232.10	232.10	-0.70%	in tolerance
160.00	162.00	162.00	-0.67%	in tolerance
100.00	102.30	102.30	-0.77%	in tolerance
30.00	30.20	30.20	-0.07%	in tolerance

Unit of flow = GPM of cust. LIQUID



Remarks: 0

Blue-White Calibration Standard used in this calibration:

Equip ID	Equip. Cert. No.	Accuracy	Equip. Cal. Date	Equip. Cal. Due	Calibration Procedure
W3/1500	5-461-8	+/- 0.43%	8/25/2015	8/25/2016	ISA-RP16.6-1961

The indicated flow reading of customer's flowmeter was read directly and compared to the calibration standard.

The Blue-White calibration standards comply with MIL-STD 45662A and ANSI/NCSL Z540-1 and are traceable to the National Institute of Standards and Technology. The measurement uncertainty of the standard used in this calibration does not exceed 25% of the certified accuracy of the flowmeter under test.

This certificate only relates to the specific flowmeter under test and may not be reproduced except in full, without prior written approval of the Blue-White Ind.

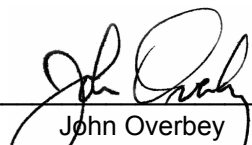


MacLean ESNA  
ATTN: Mr. Stan McLendon  
611 Country Club Road  
Pocahontas, AR 72455

This report contains the analytical results and supporting information for samples submitted on December 30, 2015. 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: MacLean ESNA  
ATTN: Mr. Stan McLendon  
smclendon@macleanfogg.com

MacLean ESNA  
611 Country Club Road  
Pocahontas, AR 72455

**SAMPLE INFORMATION**

**Project Description:**

Two (2) water sample(s) received on December 30, 2015  
433 Report - ADEQ  
P.O. No. 29-622-00

**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>
197819-1	1 001	29-Dec-2015 1000	
197819-2	2 001	28-Dec-2015 1203	

**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.** 197819-1

**Sample Identification:** 1 001 29-Dec-2015 1000

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
<b>Total Cyanide</b> SM 4500-CN C,E 1999	<b>&lt; 0.01</b> Prep: 30-Dec-2015 1019 by 308 Analyzed: 30-Dec-2015 1501 by 308	<b>0.01</b>	<b>mg/l</b> Batch: W54393	

**AIC No.** 197819-2

**Sample Identification:** 2 001 28-Dec-2015 1203

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
<b>Cadmium</b> EPA 200.7	<b>&lt; 0.004</b> Prep: 30-Dec-2015 1033 by 313 Analyzed: 30-Dec-2015 1335 by 317	<b>0.004</b>	<b>mg/l</b> Batch: S40355	
<b>Chromium</b> EPA 200.7	<b>0.014</b> Prep: 30-Dec-2015 1033 by 313 Analyzed: 30-Dec-2015 1335 by 317	<b>0.007</b>	<b>mg/l</b> Batch: S40355	
<b>Copper</b> EPA 200.7	<b>0.042</b> Prep: 30-Dec-2015 1033 by 313 Analyzed: 30-Dec-2015 1335 by 317	<b>0.006</b>	<b>mg/l</b> Batch: S40355	
<b>Lead</b> EPA 200.7	<b>&lt; 0.04</b> Prep: 30-Dec-2015 1033 by 313 Analyzed: 30-Dec-2015 1335 by 317	<b>0.04</b>	<b>mg/l</b> Batch: S40355	
<b>Nickel</b> EPA 200.7	<b>0.073</b> Prep: 30-Dec-2015 1033 by 313 Analyzed: 30-Dec-2015 1335 by 317	<b>0.01</b>	<b>mg/l</b> Batch: S40355	
<b>Silver</b> EPA 200.7	<b>&lt; 0.007</b> Prep: 30-Dec-2015 1033 by 313 Analyzed: 30-Dec-2015 1335 by 317	<b>0.007</b>	<b>mg/l</b> Batch: S40355	
<b>Zinc</b> EPA 200.7	<b>0.044</b> Prep: 30-Dec-2015 1033 by 313 Analyzed: 30-Dec-2015 1335 by 317	<b>0.002</b>	<b>mg/l</b> Batch: S40355	

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**LABORATORY CONTROL SAMPLE RESULTS**

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	0.1 mg/l	97.7	85.0-115			W54393	30Dec15 1019 by 308	30Dec15 1459 by 308		
Cadmium	5 mg/l	98.7	85.0-115			S40355	30Dec15 1034 by 313	30Dec15 1325 by 317		
Chromium	0.5 mg/l	99.1	85.0-115			S40355	30Dec15 1034 by 313	30Dec15 1325 by 317		
Copper	0.5 mg/l	97.8	85.0-115			S40355	30Dec15 1034 by 313	30Dec15 1325 by 317		
Lead	5 mg/l	99.5	85.0-115			S40355	30Dec15 1034 by 313	30Dec15 1325 by 317		
Nickel	0.5 mg/l	99.2	85.0-115			S40355	30Dec15 1034 by 313	30Dec15 1325 by 317		
Silver	0.1 mg/l	107	85.0-115			S40355	30Dec15 1034 by 313	30Dec15 1325 by 317		
Zinc	0.5 mg/l	97.3	85.0-115			S40355	30Dec15 1034 by 313	30Dec15 1325 by 317		

**MATRIX SPIKE SAMPLE RESULTS**

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	197819-1	0.1 mg/l	93.3	75.0-125	W54393	30Dec15 1019 by 308	30Dec15 1503 by 308		
	197819-1	0.1 mg/l	100	75.0-125	W54393	30Dec15 1019 by 308	30Dec15 1505 by 308		
	Relative Percent Difference:		7.33	20.0	W54393				
Cadmium	197819-2	5 mg/l	98.7	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1328 by 317		
	197819-2	5 mg/l	99.6	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1332 by 317		
	Relative Percent Difference:		0.884	20.0	S40355				
Chromium	197819-2	0.5 mg/l	99.7	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1328 by 317		
	197819-2	0.5 mg/l	101	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1332 by 317		
	Relative Percent Difference:		0.790	20.0	S40355				
Copper	197819-2	0.5 mg/l	96.9	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1328 by 317		
	197819-2	0.5 mg/l	98.6	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1332 by 317		
	Relative Percent Difference:		1.58	20.0	S40355				
Lead	197819-2	5 mg/l	100	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1328 by 317		
	197819-2	5 mg/l	101	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1332 by 317		
	Relative Percent Difference:		0.893	20.0	S40355				
Nickel	197819-2	0.5 mg/l	97.7	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1328 by 317		
	197819-2	0.5 mg/l	99.1	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1332 by 317		
	Relative Percent Difference:		1.23	20.0	S40355				
Silver	197819-2	0.1 mg/l	108	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1328 by 317		
	197819-2	0.1 mg/l	109	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1332 by 317		
	Relative Percent Difference:		0.900	20.0	S40355				
Zinc	197819-2	0.5 mg/l	96.3	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1328 by 317		
	197819-2	0.5 mg/l	102	75.0-125	S40355	30Dec15 1034 by 313	30Dec15 1332 by 317		
	Relative Percent Difference:		5.00	20.0	S40355				



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**LABORATORY BLANK RESULTS**

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>PQL</u>	<u>QC Sample</u>	<u>Preparation Date</u>	<u>Analysis Date</u>	<u>Qual</u>
Total Cyanide	< 0.01 mg/l	0.01	0.01	W54393-1	30Dec15 1019 by 308	30Dec15 1457 by 308	
Cadmium	< 0.004 mg/l	0.004	0.004	S40355-1	30Dec15 1034 by 313	30Dec15 1321 by 317	
Chromium	< 0.007 mg/l	0.007	0.007	S40355-1	30Dec15 1034 by 313	30Dec15 1321 by 317	
Copper	< 0.006 mg/l	0.006	0.006	S40355-1	30Dec15 1034 by 313	30Dec15 1321 by 317	
Lead	< 0.04 mg/l	0.04	0.04	S40355-1	30Dec15 1034 by 313	30Dec15 1321 by 317	
Nickel	< 0.01 mg/l	0.01	0.01	S40355-1	30Dec15 1034 by 313	30Dec15 1321 by 317	
Silver	< 0.007 mg/l	0.007	0.007	S40355-1	30Dec15 1034 by 313	30Dec15 1321 by 317	
Zinc	< 0.002 mg/l	0.002	0.002	S40355-1	30Dec15 1034 by 313	30Dec15 1321 by 317	



CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: <b>Maclean - ESNA</b>			PO No. <b>29622-00</b>		NO OF BOTTLES	ANALYSES REQUESTED										AIC CONTROL NO: <b>197879</b>						
Project Reference: <b>433 Report - ADEQ</b>			MATRIX			CYANIDE	Metals											AIC PROPOSAL NO:				
Project Manager: <b>Stan McLendon</b>			G R A B	C O M P	W A T E R			S O I L	1	X												
Sampled By: <b>Stan McLendon</b>						Received Temperature C <b>0.1</b>																
AIC No.	Sample Identification	Date/Time Collected	Remarks																			
1	001	12/29/15 10:00am	X		X		1	X														
2	001	12/29/15 12:03pm		X	X		1		X													
				X																		
	001	12/29/15 10:00am		X																		
Container Type			Field pH calibration on _____ @ _____																			
Preservative			Buffer:																			

G = Glass    P = Plastic    V = VOA vials    H = HCl to pH2    T = Sodium Thiosulfate  
 NO = none    S = Sulfuric acid pH2    N = Nitric acid pH2    B = NaOH to pH12    Z = Zinc acetate    A=(NH<sub>4</sub>)<sub>2</sub>SO<sub>4</sub>, NH<sub>4</sub>OH

Turnaround Time Requested: (Please circle) **EXPEDITED** IN **1** DAYS **one day**  
 Expedit results requested by: **Stan McLendon**  
 Who should AIC contact with questions:  
 Phone: **890-892-4749**  
 Report Attention to:  
 Report Address to: **DMerwitz@macleanfogg.com**  
 Email Address: **SMcLendon@macleanfogg.com**

Relinquished By: <i>[Signature]</i>	Date/Time: <b>12/29/2015-10:11am</b>	Received By: _____	Date/Time: _____
Relinquished By: _____	Date/Time: _____	Received in Lab By: <i>[Signature]</i>	Date/Time: <b>12-30-15 0955</b>
Comments: <b>Need results by Wednesday 12/30/2015</b>			



**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**

MacLean-ESNA  
611 Country Club Road  
Pocahontas, Ark 72455

**B. FACILITY & LOCATION ADDRESS**

MacLean-ESNA  
611 Country Club Road  
Pocahontas, Ark 72455

**C. FACILITY CONTACT:** Stan McLendon      **TELEPHONE NUMBER:** 870-892-4749      **e-mail:** SMcLendon@macleanfogg.com

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

**A. MONTHS WHICH REPORTS ARE DUE**

Dec - 2015 & May 2016

**B. PERIOD COVERED BY THIS REPORT**

**FROM:** June - 2015      **TO:** Nov - 2015

**(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
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

\*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

**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.

**C. Number of Regular Employees at this Facility** 75

**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)	2739	3624	Continuous
Regulated (Cyanide)	N/A	N/A	N/A
' 403.6(e) Unregulated*	N/A	N/A	N/A
' 403.6(e) Dilute	131.9	174	Continuous
Cooling Water	2108	2788	Continuous
Sanitary	1083	1039	Continuous
<b>Total Flow to POTW</b>	<b>5932</b>	<b>7453</b>	<b>*****</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	.429	1.724	2.104	.429	2.477	.268	1.625	.747	-
Monthly Avg	.162	1.064	1.288	.268	1.481	.149	.921	.405	--
Max Measured	<.004	.014	.42	<.04	.073	<.007	.044	<.01	*
Avg Measured**	<.004	.014	.42	<.04	.073	<.007	.044	<.01	*

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: .622

**(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 12/28/2015

**(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:

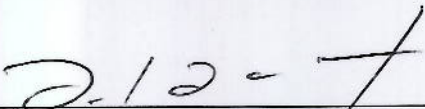
1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

**(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.

David Merwitz  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

General Manager  
OFFICIAL TITLE

12/28/2015  
DATE SIGNED