From: Jamie Belcourt (adpce.ad)

To: "Jeff Bennett"; "Mark Moore"

Cc: Stacie Wassell (adpce.ad); Richard Healey (adpce.ad)

Subject: MacLean -ESNA - December 2022 Semiannual Pretreatment Report - ARP001048 (Pocahontas - AR0034835)

Date: Thursday, January 19, 2023 8:47:05 AM

Attachments: <u>image003.png</u>

Hello,

ESNA's December 2022 semiannual pretreatment report was received, reviewed, and deemed complete and compliant with the reporting requirements in 40 C.F.R. § 403.12(e) and more specifically in compliance with the Metal Finishing standards in 40 C.F.R. § 433.14 using the combined wastestream formula in 40 C.F.R. § 403.6.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator

Division of Environmental Quality | Office of Water Quality Policy and Administration

5301 Northshore Drive | North Little Rock, AR 72118 t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us



SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 433

Use of this form is <u>not</u> an ADEQ requirement, but satisfies the reporting requirement	nts 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	B. PERIOD COVERED BY THIS REPORT
_June &December	FROM: July-2022 TO: Dec 2022
(3) DESCRIPTION OF OPERATION	
CORE PROCESS(ES) CHECK EACH APPLICABLE BLOCK G Electroplating G Electroless Plating G Anodizing X Coating (conversion) G Chemical Etching and Milling G 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 &	7153	10468	Continuous
Regulated (Cyanide)	N/A	N/A	N/A
'403.6(e) Unregulated*	N/A	N/A	N/A
' 403.6(e) Dilute	<mark>193</mark>	283	Continuous
Cooling Water	N/A	N/A	N/A
Sanitary	442	1868	Continuous
Total Flow to POTW	7835	8919	******

^{*}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.

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM **B. COMMENTS ON TREATMENT SYSTEM**

CHECK EACH APPLICABLE BLOCK

G Neutralization

G Chemical Precipitation and Sedimentation

G Chromium Reduction

G Cyanide Destruction

G Other

G None

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.

CONCENTRATIONS ARE	MOI ACC	El IMBLE, I	DIGI THE DI	SIECTION	MINITIF COI	CDIVITEDIA	OIT WIND BELL	OW DELLC	TION DAIM
40 CFR 433.15 Pollutant(mg/l) limits	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	тто*
Max for 1 day	.69	2.77	3.38	.69	3.98	.43	2.61	1.2	2.13
Monthly Avg	.26	1.71	2.07	.43	2.38	.24	1.48	.65	
Max Measured	.004	.21	.65	<.04	.14	<.007	.081	<.01	N/A
Avg Measured**	.004	.21	.65	<.04	.14	<.007	.081	<.01	N/A

[&]quot;Unregulated" has a precise legal meaning; see 40CFR403.6(e).

40 CFR 433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: ESNA, LLC Pretreatment System Effluent Sample Location 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 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: .974 (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

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]

40 CFR 433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: ESNA, LLC

16602 [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(1)
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 of 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.
penancies for submitting faise information, including the possibility of fine and imprisonment for knowing violations.
Mark Marc
Mark Moore NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE SIGNATURE
1/20/23
General Manager OFFICIAL TITLE DATE SIGNED



Email Address: bennett @ esna ploducts, com	MARK Marke @ esna products. Com	ntact with qu	lease	G = Glass P = Plastic NO = none S = Sulfuric acid pH2	Preser	Container Type					ND C-1454 M 12/7 - 13/8/32 X	C .4,	13/7-13/8/22	Sample Date In E	In Dennett	\neg		Reference: 433 Runet ADE &	ESNE		LABORATORIES
COM	M	meth			-						×	>	S	-	n -		W NAT NA	MATERIA		PO No.	CHAIN OF
		l		N = Nitric acid pH2	- VOA viale	+	+				-	-	-	_			_	_	유	8 O	CUST
l	Com	Relin By:	Relin	c acid I	VISIO I	9	0					>	×		C	e Tig	iole				YGO
	Comments:	Relinquished By:	Relinguished By: The Lennet	pH2	V	2	þ		-		X			,	m	etin	()				/ ANALY
			met	B = NaOH to pH12	H = HCl to pH2		1													ANALYSES	SIS REQU
i		Date/Time	Date/Time (3/8/22 7:30 Am	to pH12	pH2										-					ANALYSES REQUESTED	CHAIN OF CUSTODY / ANALYSIS REQUEST FORM
				1	T = Sodium Thiosulfate																
		Received in Lab By:	Received By:	acetate	m Thio																
		n Lab		1		Buffer:	on [Field				CD.	C			Yes		Carrier:	AIC PF	AIC CC	PAGE
FORM 0060		Date/Time	Date:	A=(NH ₄) ₂ SO ₄ , NH ₄ OH			(P)	Field pH calibration			AG	CD. CR. CH. PB. NJ. ZN.	N. T	Remarks		Yes No "C"		. :	AIC PROPOSAL NO:	AIC CONTROL NO:	₽ F



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 December 9, 2022. 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.

Steve Bradford

Deputy Laboratory Director

This document has been distributed to the following:

PDF cc: ESNA

ATTN: Mr. Mark Moore mmoore@esnaproducts.com

ESNA

ATTN: Mr. Jeff Bennett jbennett@esnaproducts.com



SAMPLE INFORMATION

Project Description:

Two (2) water sample(s) received on December 9, 2022 433 Report 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:

Laboratory ID	Client Sample ID	Sampled Date/Time Notes
271292-1	B1 04884 C	08-Dec-2022 0900
271292-2	N1 61974 M	08-Dec-2022 0900

Qualifiers:

D Result is from a secondary dilution factor

References:

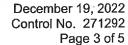
"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).

"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.

[&]quot;Standard Methods for the Examination of Water and Wastewaters", (SM).

[&]quot;American Society for Testing and Materials" (ASTM).

[&]quot;Association of Analytical Chemists" (AOAC).





ANALYTICAL RESULTS

AIC No. 271292-1

Sample Identification: B1 04884 C 08-Dec-2022 0900

 Analyte
 Result
 RL
 Units
 Qualifier

 Total Cyanide SM 4500-CN C,E 2016
 Prep: 12-Dec-2022 1518 by 376
 < 0.01 Analyzed: 14-Dec-2022 1329 by 352</td>
 mg/l Batch: W81680

AIC No. 271292-2

Sample Identification: N1 61974 M 08-Dec-2022 0900

	Result	RL	<u>Units</u>	Qualifier
Prep: 14-Dec-2022 1119 by 374	0.0040 Analyzed: 16-De	0.004 ec-2022 1417 by 374	mg/l Batch: S53545	
Prep: 14-Dec-2022 1119 by 374	0.021 Analyzed: 16-De	0.01 ec-2022 1417 by 374	mg/l Batch: S53545	
Prep: 14-Dec-2022 1119 by 374	0.65 Analyzed: 16-De	0.01 ec-2022 1417 by 374	mg/l Batch: S53545	
Prep: 14-Dec-2022 1119 by 374	< 0.04 Analyzed: 16-De	0.04 ec-2022 1417 by 374	mg/l Batch: S53545	
Prep: 14-Dec-2022 1119 by 374	0.14 Analyzed: 16-De	0.01 ec-2022 1417 by 374	mg/l Batch: S53545	
Prep: 14-Dec-2022 1119 by 374	< 0.007 Analyzed: 16-De	0.007 ec-2022 1417 by 374	mg/l Batch: S53545	
Prep: 14-Dec-2022 1119 by 374	0.081 Analyzed: 16-De	0.01 ec-2022 1417 by 374	mg/l Batch: S53545	
	Prep: 14-Dec-2022 1119 by 374 Prep: 14-Dec-2022 1119 by 374	O.0040 Analyzed: 16-De O.021 Prep: 14-Dec-2022 1119 by 374 Prep: 14-Dec-2022 1119 by 374 Analyzed: 16-De O.65 Analyzed: 16-De O.04 Prep: 14-Dec-2022 1119 by 374 Analyzed: 16-De O.14 Prep: 14-Dec-2022 1119 by 374 Analyzed: 16-De O.04 Prep: 14-Dec-2022 1119 by 374 Analyzed: 16-De O.007 Analyzed: 16-De O.081	O.0040 O.004 Prep: 14-Dec-2022 1119 by 374 O.021 O.01 Analyzed: 16-Dec-2022 1417 by 374 O.05 O.05 O.01 Analyzed: 16-Dec-2022 1417 by 374 O.65 O.01 Analyzed: 16-Dec-2022 1417 by 374 O.04 O.04 Prep: 14-Dec-2022 1119 by 374 O.14 O.01 Prep: 14-Dec-2022 1119 by 374 O.14 O.01 Prep: 14-Dec-2022 1119 by 374 O.14 O.01 Analyzed: 16-Dec-2022 1417 by 374 O.07 O.007 O.007 Analyzed: 16-Dec-2022 1417 by 374 O.007 O.007 Analyzed: 16-Dec-2022 1417 by 374 O.007 O.007 O.007 O.007 O.007 O.007 O.007 O.0081 O.001	Prep: 14-Dec-2022 1119 by 374 Prep: 14-Dec-2022 1119 by 374



DUPLICATE RESULTS

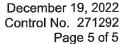
				RPD				
Analyte	AIC No.	Result	RPD	Limit	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	271196-1	0.12 mg/l			12Dec22 1518 by 376	14Dec22 1324 by 352	10	Đ
rotal Oyalido	Batch: W81680 Duplicate	0.12 mg/l	1.57	15.1	12Dec22 1520 by 376	14Dec22 1358 by 352	10	D

LABORATORY CONTROL SAMPLE RESULTS

	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Analyte			79.2-108	KED	Lilling	W81680	12Dec22 1520 by 376	14Dec22 1317 by 352	-	
Total Cyanide	0.1 mg/l	84.4	18.2-100			7701000	•	•		
Cadmium	0.2 mg/l	96.3	85.0-115			S53545	14Dec22 1120 by 374	16Dec22 1409 by 374		
Chromium	0.2 mg/l	87.0	85.0-115			S53545	14Dec22 1120 by 374	16Dec22 1409 by 374		
Copper	0.2 mg/l	96.7	85.0-115			\$53545	14Dec22 1120 by 374	16Dec22 1409 by 374		
Lead	2 mg/l	89.6	85.0-115			S53545	14Dec22 1120 by 374	16Dec22 1409 by 374		
Nickel	0.2 mg/l	94.0	85.0-115			S53545	14Dec22 1120 by 374	16Dec22 1409 by 374		
Silver	0.04 mg/l	105	85.0-115			S53545	14Dec22 1120 by 374	16Dec22 1409 by 374		
Zinc	0.2 mg/l	102	85.0-115			S53545	14Dec22 1120 by 374	16Dec22 1409 by 374		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Sample Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	271213-2 0.1 mg/l 271213-2 0.1 mg/l Relative Percent Difference	79.5 87.2 9.15	57.1-117 57.1-117 10.8	W81680 W81680 W81680	12Dec22 1520 by 376 12Dec22 1520 by 376	14Dec22 1320 by 352 14Dec22 1322 by 352		
Cadmium	271292-2 0.2 mg/l 271292-2 0.2 mg/l Relative Percent Difference	90.3 88.0 2.52	75.0-125 75.0-125 20.0	S53545 S53545 S53545	•	16Dec22 1412 by 374 16Dec22 1414 by 374		
Chromium	271292-2 0.2 mg/l 271292-2 0.2 mg/l Relative Percent Difference	81.1 82.0 0.924	75.0-125 75.0-125 20.0	S53545 S53545 S53545	•	16Dec22 1412 by 374 16Dec22 1414 by 374		
Copper	271292-2 0.2 mg/l 271292-2 0.2 mg/l Relative Percent Difference	89.0 91.5 0.613	75.0-125 75.0-125 20.0	S53545 S53545 S53545	14Dec22 1120 by 374 14Dec22 1120 by 374	16Dec22 1412 by 374 16Dec22 1414 by 374		
Lead	271292-2 2 mg/l 271292-2 2 mg/l Relative Percent Difference	80.1 79.5 0.746	75.0-125 75.0-125 20.0	S53545 S53545 S53545	14Dec22 1120 by 374 14Dec22 1120 by 374	16Dec22 1412 by 374 16Dec22 1414 by 374		
Nickel	271292-2 0.2 mg/l 271292-2 0.2 mg/l Relative Percent Difference	85.0 84.6 0.260	75.0-125 75.0-125 20.0	S53545 S53545 S53545	14Dec22 1120 by 374 14Dec22 1120 by 374	16Dec22 1412 by 374 16Dec22 1414 by 374		
Silver	271292-2 0.04 mg/l 271292-2 0.04 mg/l Relative Percent Difference	98.6 98.2 : 0.397	75.0-125 75.0-125 20.0	S53545 S53545 S53545	14Dec22 1120 by 374 14Dec22 1120 by 374			
Zinc	271292-2 0.2 mg/l 271292-2 0.2 mg/l Relative Percent Difference	101 98.7 : 1.61	75.0-125 75.0-125 20.0	S53545 S53545 S53545	•	16Dec22 1412 by 374 16Dec22 1414 by 374		





LABORATORY BLANK RESULTS

				QC			
Analyte	Result	RL	LOQ	Sample	Preparation Date	Analysis Date	Qual
Total Cyanide	< 0.0076 mg/l	0.0076	0.01	W81680-1	12Dec22 1520 by 376	14Dec22 1315 by 352	
Cadmium	< 0.002 mg/l	0.002	0.004	S53545-1	14Dec22 1120 by 374	16Dec22 1406 by 374	
Chromium	< 0.005 mg/l	0.005	0.01	S53545-1	14Dec22 1120 by 374	16Dec22 1406 by 374	
Copper	< 0.006 mg/l	0.006	0.01	S53545-1	14Dec22 1120 by 374	16Dec22 1406 by 374	
Lead	< 0.02 mg/l	0.02	0.04	S53545-1	14Dec22 1120 by 374	16Dec22 1406 by 374	
Nickel	< 0.005 mg/l	0.005	0.01	S53545-1	14Dec22 1120 by 374	16Dec22 1406 by 374	
Silver	< 0.004 mg/l	0.004	0.007	S53545-1	14Dec22 1120 by 374	16Dec22 1406 by 374	
Zinc	< 0.005 mg/l	0.005	0.01	S53545-1	14Dec22 1120 by 374	16Dec22 1406 by 374	



CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

			1620		PAGE	(OF /
7 700	PO No.	ON	ANALYSES REQUESTED	EQUESTED	AIC CO	AIC CONTROL NO:
Client: C3 IV F1		FO.			7	71212
Project H33 Round ADE Q			10		AIC PR	AIC PROPOSAL NO:
Project	MATRIX	.de .de -10			Carrier:	XII
nple of M. K.	0 0				Receive	Received on ice? Temp.
AIC Sample Date/Time A	- M G	W Э 1 ш и			3	1
C-1454 C 12/7-12/8/22	×	×			CN	. 7
61974	×	X			ວ ′ ດ ວ	CD, CR, CH, AB, NI, ZW,
					*	* TIME AS! 9:004M
					Field ph	Field pH calibration
Container Type		4			по	0
Preservative		2				
		= VOA vials	H = HCl to pH2		sulfate	0
NO = none S = Sulfuric acid pH2		N = Nitric acid pH2	a S H D H	12		A=(NH4)2004, NH40H
Turnaround Time Requested: (Please circle)		Relingaish Rv.	Relinguished	Date/Time	Received \(\mathcal{V} \)	Date/Time 8 Dec 2022
2	7	and in		9.30 Am	Thomas Doucher	9:30 pm
Who should AIC contact with questions:	1 Genneth	Relinquished		Date/Time	Received in Lab	Date/Time
Contact Phone: 870-378-539U Report Attention to: 76-5 Report		 20			DY BROWN	0060
1 1		Comments:	16			
Frail Address: here to send Devolucts. Com	ers. Com			FX 572	FX 5725 9936 4880	

FORM 0060

Shipping Order #:

10791

Date: 12/8/2022

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

Sold To	AMERICAN II 8600 KANIS R LITTLE ROCK	OAD		Ship To	AMERICAN INTERPLEX 8600 KANIS ROAD LITTLE ROCK AR 72204		
Γerms:		FOB:	Carrier: FED EX	PO#:			
Ordered	Shipped	ItemNumber	Description			Notes	
	1		OUTFALL SAMPLES TO	BE TESTED			

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 12/8/2022		NumberOfContainers 1 COOLER	Weight 26	ShippingDept: D. Boucher	CheckedBy:	
ReleasingDept. PENNETT/BOUCHER	Class	Class		ReceivedBy:		
00000		Signature	Ryan.	2012	Date	