From: Belcourt, Jamie
To: "Jeff Bennett"
Subject: RE: ESNA wastewater 433 report
Date: Tuesday, July 12, 2022 8:40:10 AM
Attachments: image002.png
image003.jpg

Hello,

ESNA's July 2022 semiannual 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.

Thank you,

Jamie Belcourt | Pretreatment Coordinator
Division of Environmental Quality | **Office of Water Quality**
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us

From: Jeff Bennett [mailto:jbennett@esnaproducts.com]
Sent: Monday, July 11, 2022 9:12 AM
To: Belcourt, Jamie; McWilliams, Carrie
Cc: Mark Moore; Jeff Bennett
Subject: FW: ESNA wastewater 433 report

Jamie/Carrie

Please find our Jan-June 2022 433 report attached for ESNA in Pocahontas. If you have any questions, feel free to contact me

Thank you,

Jeff Bennett

Plant Manager
ESNA, 611 Country Club Rd. Pocahontas Ar 72455
Office: 870-892-4749
www.esnaproducts.com jbennett@esnaproducts.com

Regulations (ITAR), the Export Administration Regulations (EAR) or the sanctions administered by the Office of Foreign Assets Control (OFAC). The recipient agrees not to disclose, transfer, or otherwise export or re-export any technical data or other restricted information to any Foreign Person (including any foreign national, foreign business or foreign government), whether in the United States or abroad, without fully complying with U.S. export control regulations, including obtaining any necessary license or other prior authorization required from the appropriate agencies of the U.S. Government.

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	B. FACILITY & LOCATION ADDRESS
ESNA, LLC 611 Country Club Road Pocahontas, Ark 72455	ESNA,LLC 611 Country Club Road Pocahontas, Ark 72455

C. FACILITY CONTACT: Jeff Bennett TELEPHONE NUMBER: 870-892-4749 e-mail: jbennett@esnaproducts.com

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

A. MONTHS WHICH REPORTS ARE DUE	B. PERIOD COVERED BY THIS REPORT
_July ___ & ___January_____	FROM: Jan- 2022 TO: June- 2022

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

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

*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.

None

C. Number of Regular Employees at this Facility
104___

D. [Reserved]

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

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge*
Regulated (Core &	3962	8237	Continuous
Regulated (Cyanide)	N/A	N/A	N/A
'403.6(e) Unregulated*	N/A	N/A	N/A
'403.6(e) Dilute	109	224	Continuous
Cooling Water	N/A	N/A	N/A
Sanitary	1547	1329	Continuous
Total Flow to POTW	5641	9818	**********

*If batch discharged please list the period of time of each batch discharge (300 gallons/day; 500 gallons/week, 2,00 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

G Neutralization
G Chemical Precipitation and Sedimentation
G Chromium Reduction
G Cyanide Destruction
G Other _____
G None

B. COMMENTS ON TREATMENT SYSTEM

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES--CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

40 CFR 433.15 Pollutant(mg/l) limits	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*
Max for 1 day	.672	2.696	3.29	.672	3.874	.419	2.541	1.168	2.073
Monthly Avg	.253	1.665	2.015	.419	2.317	.234	1.441	.633	--
Max Measured	<.004	.047	.52	<.04	.10	<.007	.17	<.01	N/A
Avg Measured**	<.004	.047	.52	<.04	.10	<.007	.17	<.01	N/A

Sample Location Pretreatment System Effluent
Sample Type (Grab* or Composite) Grab/Composite
If Grab sampled, list # of grabs over what period of time 12 over 24 hours and if composited by facility _X__ or the certified lab __ _.
Number of Samples and Frequency Collected 1 per Semi-Annual
40CFR136 Preservation and Analytical Methods Use: X Yes G No (include complete Chain of Custody)
*If a TOMP has been submitted and approved by ADEQ place N/A.
**A value here is the average of all samples taken during one (1) calendar month regardless of number of samples taken. If only one (1) sample is taken it must meet the monthly average limitation.

Indicate Combined Wastestream Factor (include calculations) if dilution streams commingle with regulated process wastestream: .973

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

B. CHECK ONE: G '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED G '433.12(a) TTO CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last semi-annual compliance report. I further certify that this facility is implementing the toxic organic management plan submitted to Arkansas Department of Environmental Quality.

Mark Moore
(Typed/Printed Name)

Mark Moore
(Corporate Officer or authorized representative signature)

Date of Signature 7/8/22

(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.

Mark Moore
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Mark Moore
SIGNATURE

General Manager
OFFICIAL TITLE

7/8/22
DATE SIGNED

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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 June 8, 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.

John Overbey
Chief Operating Officer

This document has been distributed to the following:

PDF cc: ESNA
ATTN: Mr. Mark Moore
mmoore@esnaproducts.com

AMERICAN INTERPLEX CORPORATION
LABORATORIES

ESNA
611 Country Club Road
Pocahontas, AR 72455

SAMPLE INFORMATION

Project Description:
Two (2) water sample(s) received on June 8, 2022
433 Report to ADEQ
P.O. No. 36862-00

Receipt Details:
A Chain of Custody was provided. The samples were delivered in one (1) ice chest.
Ice chest #1 was delivered with shipping documentation.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

Laboratory ID	Client Sample ID	Sampled Date/Time	Notes
266238-1	Red #1	07-Jun-2022 0645	
266238-2	Blue #2	07-Jun-2022 0645	

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).

AMERICAN INTERPLEX CORPORATION
LABORATORIES

ESNA
611 Country Club Road
Pocahontas, AR 72455

ANALYTICAL RESULTS

AIC No. 266238-1
Sample Identification: Red #1 07-Jun-2022 0645

Analyte		Result	RL	Units	Qualifier
Cadmium		**< 0.004**	0.004	**mg/l**	
EPA 200.7	Prep: 13-Jun-2022 1115 by 328	Analyzed: 13-Jun-2022 1524 by 328		Batch: S52768	
Chromium		**0.047**	0.01	**mg/l**	
EPA 200.7	Prep: 13-Jun-2022 1115 by 328	Analyzed: 13-Jun-2022 1535 by 328		Batch: S52768	
Copper		**0.52**	0.01	**mg/l**	
EPA 200.7	Prep: 13-Jun-2022 1115 by 328	Analyzed: 13-Jun-2022 1524 by 328		Batch: S52768	
Lead		**< 0.04**	0.04	**mg/l**	
EPA 200.7	Prep: 13-Jun-2022 1115 by 328	Analyzed: 13-Jun-2022 1524 by 328		Batch: S52768	
Nickel		**0.10**	0.01	**mg/l**	
EPA 200.7	Prep: 13-Jun-2022 1115 by 328	Analyzed: 13-Jun-2022 1524 by 328		Batch: S52768	
Silver		**< 0.007**	0.007	**mg/l**	
EPA 200.7	Prep: 13-Jun-2022 1115 by 328	Analyzed: 13-Jun-2022 1524 by 328		Batch: S52768	
Zinc		**0.17**	0.01	**mg/l**	
EPA 200.7	Prep: 13-Jun-2022 1115 by 328	Analyzed: 13-Jun-2022 1524 by 328		Batch: S52768	

AIC No. 266238-2
Sample Identification: Blue #2 07-Jun-2022 0645

Analyte		Result	RL	Units	Qualifier
Total Cyanide		**< 0.01**	0.01	**mg/l**	
SM 4500-CN C,E 2016	Prep: 09-Jun-2022 0811 by 352	Analyzed: 09-Jun-2022 1521 by 352		Batch: W79816	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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	85.2	76.2-121			W79816	09Jun22 0812 by 352	09Jun22 1519 by 352		
Cadmium	0.2 mg/l	94.2	85.0-115			S52768	13Jun22 1115 by 328	13Jun22 1508 by 328		
Chromium	0.2 mg/l	100	85.0-115			S52768	13Jun22 1115 by 328	13Jun22 1722 by 328		
Copper	0.2 mg/l	94.2	85.0-115			S52768	13Jun22 1115 by 328	13Jun22 1508 by 328		
Lead	2 mg/l	93.8	85.0-115			S52768	13Jun22 1115 by 328	13Jun22 1508 by 328		
Nickel	0.2 mg/l	94.4	85.0-115			S52768	13Jun22 1115 by 328	13Jun22 1508 by 328		
Silver	0.04 mg/l	108	85.0-115			S52768	13Jun22 1115 by 328	13Jun22 1508 by 328		
Zinc	0.2 mg/l	92.6	85.0-115			S52768	13Jun22 1115 by 328	13Jun22 1508 by 328		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	266238-2	0.1 mg/l	98.3	65.2-124	W79816	09Jun22 0812 by 352	09Jun22 1522 by 352		
	266238-2	0.1 mg/l	99.6	65.2-124	W79816	09Jun22 0812 by 352	09Jun22 1524 by 352		
	Relative Percent Difference:		1.26	14.7	W79816				
Cadmium	266227-1	0.2 mg/l	85.4	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1510 by 328		
	266227-1	0.2 mg/l	83.6	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1514 by 328		
	Relative Percent Difference:		2.07	20.0	S52768				
Chromium	266227-1	0.2 mg/l	89.4	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1725 by 328		
	266227-1	0.2 mg/l	87.8	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1727 by 328		
	Relative Percent Difference:		1.78	20.0	S52768				
Copper	266227-1	0.2 mg/l	79.5	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1510 by 328		
	266227-1	0.2 mg/l	79.5	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1514 by 328		
	Relative Percent Difference:		0.00	20.0	S52768				
Lead	266227-1	2 mg/l	81.8	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1510 by 328		
	266227-1	2 mg/l	79.0	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1514 by 328		
	Relative Percent Difference:		3.42	20.0	S52768				
Nickel	266227-1	0.2 mg/l	82.8	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1510 by 328		
	266227-1	0.2 mg/l	80.2	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1514 by 328		
	Relative Percent Difference:		3.24	20.0	S52768				
Silver	266227-1	0.04 mg/l	93.1	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1510 by 328		
	266227-1	0.04 mg/l	94.0	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1514 by 328		
	Relative Percent Difference:		0.909	20.0	S52768				
Zinc	266227-1	0.2 mg/l	92.7	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1510 by 328		
	266227-1	0.2 mg/l	89.8	75.0-125	S52768	13Jun22 1115 by 328	13Jun22 1514 by 328		
	Relative Percent Difference:		2.96	20.0	S52768				

AMERICAN INTERPLEX CORPORATION
LABORATORIES

ESNA
611 Country Club Road
Pocahontas, AR 72455

LABORATORY BLANK RESULTS

Analyte	Result	RL	LOQ	QC Sample	Preparation Date	Analysis Date	Qual
Total Cyanide	< 0.0076 mg/l	0.0076	0.01	W79816-1	09Jun22 0812 by 352	09Jun22 1517 by 352	
Cadmium	< 0.002 mg/l	0.002	0.004	S52768-1	13Jun22 1115 by 328	13Jun22 1505 by 328	
Chromium	< 0.005 mg/l	0.005	0.01	S52768-1	13Jun22 1115 by 328	13Jun22 1720 by 328	
Copper	< 0.006 mg/l	0.006	0.01	S52768-1	13Jun22 1115 by 328	13Jun22 1505 by 328	
Lead	< 0.02 mg/l	0.02	0.04	S52768-1	13Jun22 1115 by 328	13Jun22 1505 by 328	
Nickel	< 0.005 mg/l	0.005	0.01	S52768-1	13Jun22 1115 by 328	13Jun22 1505 by 328	
Silver	< 0.004 mg/l	0.004	0.007	S52768-1	13Jun22 1115 by 328	13Jun22 1505 by 328	
Zinc	< 0.005 mg/l	0.005	0.01	S52768-1	13Jun22 1115 by 328	13Jun22 1505 by 328	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: ESNA
Project Reference: 433 Report to ADEQ
Project Manager:
Sampled By: Mark Moore
PO No.:
AIC CONTROL NO: 266238
AIC PROPOSAL NO:
Carrier: FX
Received on ice? (Yes) No — Temp. 0.8 °C

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL		NO OF BOTTLES	Metals	Cyanide	Remarks
M	Red #1	6/6/22 6:45 Am – 6/7/22 6:45 Am		X	X						Every 2 hr sample composite
C	Blue #2	6/6/22 6:45 Am – 6/7/22 6:45 Am		X	X						machine pulled 24 hrs.
											Field pH calibration
		Container Type							P	P	on ____ @ ____
		Preservative							N	B	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=$(NH_4)_2SO_4$, NH_4OH

Turnaround Time Requested: (Please circle)
NORMAL or EXPEDITED IN ____ DAYS
Expedited results requested by:
Who should AIC contact with questions:
Contact Phone: (870) 378-7024
Report Attention to: Mark Moore
Email Address: mmoore@esnaproducts.com

Relinquished	Date/Time	Received	Date/Time
By: M Moore	6/7/22 7:00 Am	By: Norman Boucher	7 June 2022 7:00 AM
Relinquished By:	Date/Time	Received in Lab By: D. Brown	Date/Time 6-8-22 1020

Comments:

TRK# 0201 5725 9936 0852

FORM 0060

MIS 1 Revised:

Shipping Order #:

10691

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

Date: 6/7/2022

Sold To:
AMERICAN INTERPLEX
8600 KANIS ROAD
LITTLE ROCK AR 72204

Ship To:
AMERICAN INTERPLEX
8600 KANIS ROAD
LITTLE ROCK AR 72204

Terms: FOB: Carrier: ~~UPS NDA~~ FEDEX NDA PO#:

Ordered	Shipped	ItemNumber	Description	Notes
	2		WATER SAMPLES FOR TESTING	

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	NumberOfContainers	Weight	ShippingDept:	CheckedBy:
6/7/2022	1 COOLER	16 LBS	D. Boucher	

ReleasingDept.	Class	ReceivedBy:
D BOUCHER/M MOORE		

Donald Boucher Signature 7 June 2022 Date