

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

Use of this form is not an ADEQ requirement, but satisfies the reporting requirements in 40 CFR 403.12(e).

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION and NPDES Pretreatment Tracking # _____

<p>A. LEGAL NAME & MAILING ADDRESS</p> <p>ESNA, LLC 611 Country Club Road Pocahontas, Ark 72455</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p>ESNA, LLC 611 Country Club Road Pocahontas, Ark 72455</p>
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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)

<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p><u>July</u> & <u>January</u></p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p>FROM: July 2021- TO: December 2021-</p>
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(3) DESCRIPTION OF OPERATION

<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Electroplating <input type="checkbox"/> Electroless Plating <input type="checkbox"/> Anodizing <input checked="" type="checkbox"/> Coating (conversion) <input type="checkbox"/> Chemical Etching and Milling <input type="checkbox"/> Printed Circuit Board Manufacture</p> <p><u>ANCILLARY PROCESS(ES)*</u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p><u>Passivate Rinse Tank</u></p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>	<p>B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.</p>
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*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

<p>C. Number of Regular Employees at this Facility</p> <p>86</p>	<p>D. [Reserved]</p>
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(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge*
Regulated (Core &	4431	5805	Continuous
Regulated (Cyanide)	N/A	N/A	N/A
' 403.6(e) Unregulated*	N/A	N/A	N/A
' 403.6(e) Dilute	116	157	Continuous
Cooling Water	N/A	N/A	N/A
Sanitary	1080	1066	Continuous
Total Flow to POTW	5659	7048	*****

*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	.672	2.697	3.291	.672	3.875	.419	2.541	1.168	2.074
Monthly Avg	.253	1.665	2.015	.419	2.317	.234	1.441	.633	--
Max Measured	<.004	.065	.56	<.04	.15	<.007	.21	<.01	N/A
Avg Measured**	<.004	.065	.56	<.04	.15	<.007	.21	<.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.

Chris Williamson
(Typed/Printed Name)


(Corporate Officer or authorized representative signature)

Date of Signature 1/11/22

(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. Lean Manufacturing
2. LED Lights
3. Recycle Oil
4. Recycle Material
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.

Chris Williamson
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

General Manager
OFFICIAL TITLE

1/11/22
DATE SIGNED

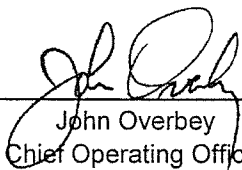


ESNA
ATTN: Mr. Mark Moore
611 Country Club Road
Pocahontas, AR 72455

This report contains the analytical results and supporting information for the sample received on December 9, 2021. 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

ESNA
611 Country Club Road
Pocahontas, AR 72455

SAMPLE INFORMATION

Project Description:

One (1) water sample(s) received on December 9, 2021
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:

<u>Laboratory ID</u>	<u>Client Sample ID</u>	<u>Sampled Date/Time</u>	<u>Notes</u>
261003-1	Sample identification not provided	08-Dec-2021 0830	1

Notes:

1. Sample label was incomplete in regard to sample identification

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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ANALYTICAL RESULTS

AIC No. 261003-1

Sample Identification: Sample identification not provided 08-Dec-2021 0830

<u>Analyte</u>		<u>Result</u>	<u>RL</u>	<u>Units</u>	<u>Qualifier</u>
Total Cyanide		< 0.01	0.01	mg/l	
SM 4500-CN C,E 2011	Prep: 13-Dec-2021 0904 by 300	Analyzed: 13-Dec-2021 1236 by 300		Batch: W77968	
Cadmium		< 0.004	0.004	mg/l	
EPA 200.7	Prep: 10-Dec-2021 1036 by 328	Analyzed: 10-Dec-2021 1538 by 328		Batch: S51935	
Chromium		0.065	0.01	mg/l	
EPA 200.7	Prep: 10-Dec-2021 1036 by 328	Analyzed: 10-Dec-2021 1538 by 328		Batch: S51935	
Copper		0.56	0.01	mg/l	
EPA 200.7	Prep: 10-Dec-2021 1036 by 328	Analyzed: 10-Dec-2021 1538 by 328		Batch: S51935	
Lead		< 0.04	0.04	mg/l	
EPA 200.7	Prep: 10-Dec-2021 1036 by 328	Analyzed: 10-Dec-2021 1538 by 328		Batch: S51935	
Nickel		0.15	0.01	mg/l	
EPA 200.7	Prep: 10-Dec-2021 1036 by 328	Analyzed: 10-Dec-2021 1538 by 328		Batch: S51935	
Silver		< 0.007	0.007	mg/l	
EPA 200.7	Prep: 10-Dec-2021 1036 by 328	Analyzed: 10-Dec-2021 1538 by 328		Batch: S51935	
Zinc		0.21	0.01	mg/l	
EPA 200.7	Prep: 10-Dec-2021 1036 by 328	Analyzed: 10-Dec-2021 1538 by 328		Batch: S51935	

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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	102	72.4-108			W77968	13Dec21 0904 by 300	13Dec21 1228 by 300		
Cadmium	0.2 mg/l	98.8	85.0-115			S51935	10Dec21 1035 by 328	10Dec21 1508 by 328		
Chromium	0.2 mg/l	103	85.0-115			S51935	10Dec21 1035 by 328	10Dec21 1508 by 328		
Copper	0.2 mg/l	97.4	85.0-115			S51935	10Dec21 1035 by 328	10Dec21 1508 by 328		
Lead	2 mg/l	98.8	85.0-115			S51935	10Dec21 1035 by 328	10Dec21 1508 by 328		
Nickel	0.2 mg/l	99.6	85.0-115			S51935	10Dec21 1035 by 328	10Dec21 1508 by 328		
Silver	0.04 mg/l	110	85.0-115			S51935	10Dec21 1035 by 328	10Dec21 1508 by 328		
Zinc	0.2 mg/l	100	85.0-115			S51935	10Dec21 1035 by 328	10Dec21 1508 by 328		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	260980-2	0.1 mg/l	94.1	67.0-109	W77968	13Dec21 0904 by 300	13Dec21 1232 by 300		
	260980-2	0.1 mg/l	105	67.0-109	W77968	13Dec21 0904 by 300	13Dec21 1234 by 300		
	Relative Percent Difference:		11.0	14.6	W77968				
Cadmium	260923-1	0.2 mg/l	87.1	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1511 by 328		
	260923-1	0.2 mg/l	83.8	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1515 by 328		
	Relative Percent Difference:		3.78	20.0	S51935				
Chromium	260923-1	0.2 mg/l	90.9	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1511 by 328		
	260923-1	0.2 mg/l	87.4	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1515 by 328		
	Relative Percent Difference:		3.87	20.0	S51935				
Copper	260923-1	0.2 mg/l	86.4	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1511 by 328		
	260923-1	0.2 mg/l	82.7	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1515 by 328		
	Relative Percent Difference:		4.31	20.0	S51935				
Lead	260923-1	2 mg/l	84.1	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1511 by 328		
	260923-1	2 mg/l	81.2	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1515 by 328		
	Relative Percent Difference:		3.48	20.0	S51935				
Nickel	260923-1	0.2 mg/l	85.3	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1511 by 328		
	260923-1	0.2 mg/l	81.8	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1515 by 328		
	Relative Percent Difference:		4.13	20.0	S51935				
Silver	260923-1	0.04 mg/l	94.9	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1511 by 328		
	260923-1	0.04 mg/l	91.0	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1515 by 328		
	Relative Percent Difference:		4.16	20.0	S51935				
Zinc	260923-1	0.2 mg/l	96.5	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1511 by 328		
	260923-1	0.2 mg/l	92.3	75.0-125	S51935	10Dec21 1035 by 328	10Dec21 1515 by 328		
	Relative Percent Difference:		3.94	20.0	S51935				



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LABORATORY BLANK RESULTS

<u>Analyte</u>	<u>Result</u>	<u>RL</u>	<u>LOQ</u>	<u>QC Sample</u>	<u>Preparation Date</u>	<u>Analysis Date</u>	<u>Qual</u>
Total Cyanide	< 0.0085 mg/l	0.0085	0.01	W77968-1	13Dec21 0904 by 300	13Dec21 1226 by 300	
Cadmium	< 0.002 mg/l	0.002	0.004	S51935-1	10Dec21 1035 by 328	10Dec21 1505 by 328	
Chromium	< 0.005 mg/l	0.005	0.01	S51935-1	10Dec21 1035 by 328	10Dec21 1505 by 328	
Copper	< 0.006 mg/l	0.006	0.01	S51935-1	10Dec21 1035 by 328	10Dec21 1505 by 328	
Lead	< 0.02 mg/l	0.02	0.04	S51935-1	10Dec21 1035 by 328	10Dec21 1505 by 328	
Nickel	< 0.005 mg/l	0.005	0.01	S51935-1	10Dec21 1035 by 328	10Dec21 1505 by 328	
Silver	< 0.004 mg/l	0.004	0.007	S51935-1	10Dec21 1035 by 328	10Dec21 1505 by 328	
Zinc	< 0.007 mg/l	0.007	0.01	S51935-1	10Dec21 1035 by 328	10Dec21 1505 by 328	



CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE 1 OF 1

Client: ESNA		Project Reference: 433 Report to ADEQ		Project Manager: Mark Moore		Sampled By: Mark Moore		AIC No. 1		Date/Time Collected 12-7-21 8:30 AM		G R A B X		C O M P X		W A T E R X		S O I L X		NO OF BOTTLES		ANALYSES REQUESTED		AIC CONTROL NO. 20020003		AIC PROPOSAL NO.		Carrier: 5061 5673 1010		Received Temperature C		Remarks Every 2hr Sample Composite	
AIC No. 2		Date/Time Collected 12-7-21 8:30 AM		G R A B X		C O M P X		W A T E R X		S O I L X		NO OF BOTTLES		ANALYSES REQUESTED		AIC CONTROL NO.		AIC PROPOSAL NO.		Carrier:		Received Temperature		Remarks Machine pulled		Field pH calibration on @		Buffer:		Date/Time 8 DEC 2021 9:15		Received in Lab 12-9-21 0900	
Turnaround Time Requested: (Please circle) NORMAL or EXPEDITED IN ___ DAYS		Expedited results requested by:		Who should AIC contact with questions: Mark Moore		Phone: (870) 378-7224 Fax		Report Attention to: Mark Moore		Report Address to: markmoore@esna-products.com		Relinquished By: Mark Moore		Date/Time 12/8/21 8:45		Received By: Arnold Bowley		Date/Time 12-9-21 0900		Received in Lab By: D. BROWN		Comments:		H = HCl to pH2 B = NaOH to pH12		T = Sodium Thiosulfate Z = Zinc acetate		V = VOA vials N = Nitric acid pH2		P = Plastic S = Sulfuric acid pH2		Container Type Preservative	