Wilson, Tabatha

From:	Torrence, Rufus
Sent:	Tuesday, August 06, 2013 9:31 AM
To:	mstrozensky@euramax.com
Cc:	Wilson, Tabatha
Subject:	AFIN 54-00132 ARP001044 Site Visit to Amerimax for Compliance Assurance: Inspection
Attachments:	AMX Insp 20130717.doc; AMX Lab Report.doc; AMX EqualLimits Feb 2013 Equal Limits.xls

ADEQ

ARKANSAS

Department of Environmental Quality

August 6, 2013

Mr. Mark Strozensky, Plant Manager
Amerimax Coated Products, Inc.
215 Phillips 324 Road
Helena, AR 72342

Re: Site Visit for Compliance Assurance: Inspection
(Tracking Number: ARP001044 AFIN: 54-001312 City of Helena NPDES No.: AR0043389)

Dear Mr. Seiler:

Part of ADEQ responsibility to EPA is to ensure that inspections of industries regulated by categorical pretreatment standards (40 CFR Part 405 – 471) are performed on a periodic basis. These industries are referred to as Categorical Industrial Users (CIUs) if they discharge the regulated wastewater into the local Publicly Owned Treatment Works (POTW). Amerimax has processes (Galvanized Steel and Aluminum Coating operations) in the Helena facility that are regulated by 40 CFR Part 465 and discharges the wastewater from these operations into the City of Helena POTW. Therefore, Amerimax is a CIU. In accordance to 40 CFR 403.12(e), Amerimax must submit periodic reports to the Control Authority (ADEQ or Department) and in accordance with 40 CFR 403.8(f)(2)(v) be inspected by the Control Authority at least bi-annually. The Department appreciates Amerimax taking the time on Wednesday (July 17, 2013) to show the ADEQ Engineer/Inspector (Rufus Torrence) the facility in Helena.

The inspection consisted of a pre-inspection meeting, observing the coil coating line in operation and wastewater sampling. During the meeting the Inspector discussed proper procedures for calculating Amerimax

allowable effluent limits. The Inspector asked to review Amerimax production records. The Interim Plant Manager (Mark Strozensky) apologized for not being able to find the records since he had just recently arrived. The Inspector informed Amerimax that all records must be kept a minimum of three (3) years in accordance with 40 CFR 403.12(o)(2). The Inspector inquired about the procedure to document production records (square footage of coated coils). The Plant Manager replied that Amerimax used three independent procedures: (1) Weight coils coming in at truck scale (2) Weight coated coils plus scrap at take-up reel and (3) Weight coated leaving plant at truck scale. Knowing the density and dimensions of the coils, the operators convert the weight into square footage.

The Department has developed an Excel workbook which will calculate Amerimax limits based on total production (square footage of coil coated) and total volume (in gallons) of wastewater discharged to the POTW. The workbook is attached. The Amerimax Helena plant has only one line which coats both galvanized steel and aluminum. The workbook math model is based on two independent plants (one plant which coats only steel and one plant which coats only aluminum). Therefore, Amerimax must take two samples during each six month reporting period. One sample must be taken when the line is coating steel and the second sample must be taken when the line is coating aluminum. The plant receives aluminum/steel coils that are about 13,000 feet long by 4 feet wide by 3/16" thick. The line can coat one or both sides. Electric motors drive mechanical rolls which pull the coils from the reel and force the metal coil through several operations (alkaline cleaning, painting/coating, heat drying, etc.) which ends with a take-up reel. At the time of the site visit, Amerimax was coating aluminum. The Inspector took a grab sample of the wastewater in the weir tank. The attached ADEQ analysis shows that Amerimax is compliant with Aluminum limits in February 2013 semi-annual report (Chromium Allowable Limit: 0.259 & none detected; Copper Allowable Limit: N/A mg/l & none detected; Zinc Allowable Limit: 0.720 mg/l & 0.0436 mg/l detected). Amerimax should continue to treat the wastewater before releasing it to the POTW.

The Department appreciates Amerimax's continued efforts in periodic reporting.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us .

Sincerely,

Rufus Torrence,
ADEQ Engineer/Inspector

Attachments: Amerimax Equal Limits Excel Workbook
ADEQ Lab Analysis
Inspection Report for July 17, 2013 Site Visit for Compliance Assurance

Pretreatment Industrial Inspection
Facility Information

Facility Name:	Site Address: **215 Philips 324 Road**
Amerimax Coated Products, Inc.	**Helena, AR 72342**
Signatory Authority (Name & Title): **Mark Strozensky, Plant Manager**	
Phone: **678-896-8817**	Mailing Address (if different):
Fax: **(870) 572-5594**	**Same**
Address: **Same**	Corporate Owner Name and address (if applicable):
	Euramax International, Inc
Phone: **Same**	**5445 Triangle Pwy/Suite 350 / Norcross, Georgia 30092**
Fax:	Phone: **(770) 449-7066**
Contact Person (Name & Title):	Fax: **(770) 449-7354**
Mark Strozensky, Plant Manager	Corporate CEO: **Mitch Lewis**
e-mail: mstrozensky@euramax.com	e-mail: **mlewis@euramax.com**
Facility Permit # **ARP001044**	Last Inspection Date: **July 20, 2011**
POTW (City) IU discharges to: **Helena WWTP**	POTW's NPDES # **AR0043389**
Industrial Classification: ☒ Categorical ☐ Significant	AFIN **54-00132**
If Categorical, list which CFR #(s) the facility is subject to: **40 CFR 465 Coil Coating; Subparts B & C**	

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Comments : **Amerimax must normalize the flows to get correct pounds per day of metals discharged to the POTW. The Department provided Amerimax with guidance and discussed the flow normalization and allowable limits calculation procedures during the pre-inspection meeting.**

Inspector's Name (Print): **Rufus Torrence**	Signature: Rufus Torrence
IU Rep's Name (Print) **Mark Strozensky**	Signature: **(Not Required)**

Date and Time Inspection Ended: **July 17, 2013 @ 1:00 pm**

I. Summary of Inspection

A. Inspection and Objective (Complete Before Inspection)

☐ Permit Renewal	☒ Bi-Annual	☐ Spill/Slug	☐ Unscheduled
☐ New Construction	☐ Noncompliance	☐ Follow-up	☐ Complaint

Inspection Objective(s)

Compliance Assurance

Checklist of items to be reviewed and/or visually inspected:

☒ Pre-inspection Meeting	☐ Permit Conditions	☐ Safety Concerns
☒ Process Inspection	☒ Pretreatment Process	☐ TOMP
☒ Chemical Storage	☒ Discharge point(s)	☐ Spills/Slug Control Plan
☐ Records Review	☐ RCRA information	☐ Process/Flow/Pretreatment Schematics
☐ IU sampling procedures	☐ Flow/pH Meter(s)	☐ Calibration Records
☐ MSDS Inventory List	☐ New MSDS	☐

Comments:

B. Inspection Analysis

Were there any deficiencies/violations identified and noted during the inspection? ☐ Yes ☒ No

Provide a brief narrative of deficiencies/violations or other concerns in the following areas:

Records Review

Process Area(s)

Pretreatment System

Self Monitoring Procedures

Diversion/Sewer Meters

Spill/Slug Control Plan

Sampling Point

Chemical Storage

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: **07-17-13 @ 11:50 pm**	SIC code(s): **3479**
IU Reps/Titles	Control Authority Reps/Titles
Mark Strozensky, Interim Plant Manager **Brian Fowler, Assistant Plant Manager** **Eddie Little, Wet Section Operator**	**Rufus Torrence, ADEQ Engineer**
End product(s): **Coated Aluminum & Galvanized Coils**	Approx. # of units produced: **200 million Square Feet per Year**
Days of Operation: **Monday thru Friday**	Days of Production (if different): **(Same)**
Hours of Operation: **24 hours per day (two shifts)**	Hours of Production (if different):

Shift 1, hrs.: **7 am** to **7 pm**	Shift 2, hrs.: **7 pm** to **7 am**	Shift 3 **(Not Applicable)**
# of Employees: **42**	Peak Mos.: **May thru September**	"Off" Mos.: **Nov & Dec**

Are there any scheduled plant shutdowns? Yes ☒	No ☐	N/A ☐	If yes, when? **2 weeks at Christmas**
Are there designated plant clean-up days? Yes ☐	No ☐	N/A ☒	If yes, when?
Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes ☒	No ☐		
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes ☐	No ☒		
If Yes, explain:			
Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: ☒ Yes.	☐ No		
If Yes, explain: **Stationery and mobile equipment operating**			
Has there been any changes since the last inspection regarding the following items:			
Plant/flow/process layout? Yes ☐	No ☒	If yes, obtain copy of updated schematic for facility file.	
Processes? Yes ☒	No ☐	If yes, explain: **Water Treatment Equipment Added (R/O and Demin)**	
Production Levels? Yes ☒	No ☐	If yes, explain: **Slow Down in the Economy**	
Raw materials? Yes ☐	No ☒	If yes, explain:	
Flow rates? Yes ☐	No ☒	If yes, explain	

Are regulated and non-regulated wastestreams combined?	yes ☐	no ☐	N/A ☒
Prior to Pretreatment System?	yes ☐	no ☐	N/A ☒
If Yes, was the CWF used to calculate limits?	yes ☐	no ☐	
Prior to connection to the POTW sanitary sewer?	yes ☐	no ☐	N/A ☒
At connection to sanitary sewer?	yes ☐	no ☐	N/A ☒
Production and flows verified for Production-Based Standards?	yes ☒	no ☐	N/A ☐

What is the current avg. production rate and process flow?

(See note 2 below under Additional Comments).

Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? N/A ☒

No Indirect Discharge permit issued; Amerimax must comply with published standards.

B. Facility Permits		
Permit Type	Permit No.	Expiration Date
Air	**1581 – AR - 1**	**Not Applicable**
RCRA		
NPDES	**ARR00D965**	
Other		

C. Additional Comments

(Note which section or attachment comments are regarding)

1. Zinc Phosphate operation for steel coils. The Aluminum coil density is approximately 0.098 lb/cu in.

2. During the calendar year 2008 Amerimax purchased 142,662,000 pounds of Aluminum coils. If both sides are coated, the square footage reported should approximately equal 75 % of the weight of the coils. Note that the aluminum coil is approximately 2.646 lbs per each square foot coated; hence 2 sides / 2.646 = 0.755 or approximately 75%. The Inspector inquired about the production for the 2012 calendar year but the new interim plant manager was not familiar with the previous filing system.

3. Amerimax currently has only 42 employees.

4. Amerimax has purchased a number of DI units. The goal is to achieve a 100% recycle rate (except for water loss due to evaporation).

5. Amerimax receives aluminum/steel coils about 13,000 feet long by 4 feet wide and about 3/16" thick and coats (paints) one or both sides in a single process line. Electric motors drive mechanical rolls which pull the metal coils from the reels and forces them through several steps (alkaline cleaning, painting/coating, heat drying, etc.) alone the line which ends with a take-up reel for the coated product. Amerimax sells the coated coils to industrial manufacturers which make gutters, aluminum sidings, etc.

Attachment A: Industrial Process(es)			
List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not			
1. **Aluminum Coil Coating**	Yes ☒ No ☐	4.	Yes ☐ No ☐
2. **Galvanized Coil Coating**	Yes ☒ No ☐	5.	Yes ☐ No ☐
3.	Yes ☐ No ☐	6.	Yes ☐ No ☐
Were processes visually inspected? Yes ☒ No ☐ N/A ☐			
Brief description of process(es):			
Coils are unwound, cleaned with caustic detergent and rinsed with water. The coils are then coated on one or both sides. After the coating has cured, the coils are rewound.			
General observations of facility's indoor housekeeping: **Good**			
General observations of area outside facility's building: **Good**			
Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured (M) or estimated (E). If batch (B) discharged, list frequency and volume (1000 gal/month, e.g.).			
☒ Process Rinse Overflows _____	☐ Equip. Cleanup **********	☒ Floor Cleanup _____	☒ Spent Bath Solutions _____
☐ Product Cleaning **********	☐ Forklifts Maint./Wash **********	☐ Tank Dragout **********	☐ Air Pollution Devices **********
☒ Boiler Blowdown	☐ Spent Rinse Tanks **********	☐ Equipment Coolants **********	☐ Non-Contact Cooling Water **********
☐ Stormwater **********	☐ **********	☐ **********	☐ **********
List Major Raw Materials and Chemicals used: **Aluminum coils, galvanized steel coils, caustic, phosphate solution, various paints and solvents.**			
Check Waste Stream Pollutants of Concern from Process(es)			
☐ BOD	☒ CN^-	☒ Metals (List) **Chromium, Copper and Zinc**	☐ Solvents (List)
☐ TSS	☐ Cl_2		
☐ O&G	☐ S^-		
☐ pH	☐		
Are there floor drains in the Process area? ☐ Yes ☒ No If yes list number and the location of all floor drains:			
No wastewater can enter the POTW through floor drains; all wastewater in floor troughs are pumped to			

the treatment system.

Attachment B: Pollution Prevention (P2) / Recycling Activities	
Does the facility have a written P2 Plan? Yes ☒ No ☐	
Does this facility practice P2? Yes ☒ No ☐	
Environmental Management System in place? Yes ☐ No ☒	
ISO Certified? Yes ☐ No ☒	
Written Standard Operating Procedures? Yes ☒ No ☐	
Explain:	
Preventative Maintenance Program Yes ☒ No ☐ (hydraulic systems, valves, pumps, etc)	
Explain:	
Water Reuse: Yes ☒ No ☐	
Explain**:** **Demin and Rinse used as make-up water**	
Cost Accounting to Track Savings: Yes ☐ No ☒	
Explain:	
Inventory Control / "Green Purchasing": Yes ☒ No ☐ (lean manufacturing/"env. friendly purchasing", etc)	
Explain:	
Employee Training: Yes ☒ No ☐	
Explain:	
Spent Solvent Reclamation? Yes ☐ No ☒	
Explain:	
Recycle Paper, Aluminum, Boxes, and Pallets? Yes ☒ No ☐	
Explain:	
Recycle Waste Oil, Solvents, and Lubricants? Yes ☐ No ☒	
Explain:	
Other Activities	
P2 Equipment/Practices in use:	
☐ Overflow Alarms	☐ Aqueous Cleaning Solutions
☒ Fog Spray Rinsing	☒ Countercurrent Rinsing
☐ Dragout Collection Trays	☐ Seal-Less Pumps
☐ Air Jets to Blow Parts Dry	☒ Secondary Containment of Process Solutions
☐ Aqueous Paint Stripping Solutions	☐ Bead Blasting to Remove Paint
☐ Water Soluble Cutting Fluids	☒ Recycle Overspray
☒ In-Process Recycle (Ion Exchange, Reverse Osmosis)	☒ Conductivity Meters

☐ Dead Rinse Tanks	☒ Bath / Rinse Filtration

Attachment C: Pretreatment System

Are wastestreams segregated before pretreatment? ☐ Yes ☐ No ☒ N/A

Are they pretreated prior to discharge to the sanitary sewer? ☒ Yes ☐ No ☐ N/A

Was the pretreatment system visually inspected during this visit? ☒ Yes ☐ No ☐ N/A

Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:

☐ Dissolved air floatation	☐ Membrane Tech.	☐ Ion Exchange	☐ Biological Treatment
☐ Centrifugation	☒ Flow Equalization	☐ Ozonation	☐ Chlorinating
☒ Chemical Precipitation	☐ Oil/Water Separation	☒ Reverse Osmosis	☐ Grit Removal
☒ Sludge Filter Press	☐ Grease Trap	☐ Screen	☐ Solvent Separation
☒ pH Adjustment	☐ Sand Trap	☐ Sedimentation	☐ Silver Recovery
☒ Belt/Disk Oil Skimmer	☐	☐	☐

Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):

System appears to be properly maintained

Does the description match the schematic currently on file? ☐ Yes ☐ No ☒ N/A

System Operator(s) Name:

Eddie Little, Wet Section Operator

Does discharge permit require licensed operator? ☐ Yes ☐ No ☒ N/A

Is the System Operator(s) licensed by the State of Arkansas (per Reg. # 3?) ☐ Yes ☒ No ☐ N/A

List Name(s) and License classification:

Not applicable

Is training provided to the Pretreatment System Operator(s)? ☒ Yes ☐ No ☐ N/A

If Yes, list type and frequency:

Is the discharge from the Pretreatment System? ☐ Batch ☒ Continuous ☐ Combination

If any discharges are batch type or combination, describe the following:

Volume of each batch: gallons per

Describe process from which batch originated (spent bath, e.g.): **Coil Coating**

Approximate duration of batch discharge:

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
22 ½ º V-Notch	**Factory Representative**	**Instantaneous and totalized flow capability with electronic**
Wier w/ ISCO Flow Monitor	**Once per Year**	**data acquisition and recording ("Thumb Drive")**

Attachment D: Chemical Storage Area(s)		
Does the facility have a designated chemical storage area(s)? ☒ Yes ☐ No		
Was this area(s) visually inspected? ☒ Yes ☐ No ☐ N/A		
Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. **Paint Warehouse**	☐ Yes ☒ No[1]	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2. **Waste Storage Room**	☐ Yes ☒ No[1]	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
3. **Hazardous Waste Storage**	☐ Yes ☒ No[1]	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
4.	☐ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
Does the Chemical Storage Area(s) contain any of the following?		
☒ Dikes, Berms for Containment	☐ Plugs for Floor Drains	
☐ Secondary Tanks for Holding	☐ Premix (low) Concentrations	
☐ Alarms	☐ Chain restraints, limited access	
☒ Spills Control Kits for Cleanup	☐ Notification Procedures	
☐ Chemical desegregation within Storage Area	☐ Other	
Chemical Inventory List (MSDS) on file? ☒ Yes ☐ No ☐ N/A		
Were any new MSDS reviewed during the Inspection? ☐ Yes ☒ No ☐ N/A		
If yes, list below:		
Chemical storage comments:		
[1]**Floor in this area is below the main floor and sloped to a center holding pit. The pit can only be emptied by pumping.**		
Chemical handling procedures (totes, dolly, buckets, hardline, etc):		
Totes are hauled to sites in the plant by using forklifts.		

Attachment E: Spill/Slug Control Plan	
Does the facility have a Spill/Slug control plan?	☐ yes ☒ no[1]
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	☐ yes ☐ no ☐ N/A
(A) Describes discharge practices including non routine batch (slug) discharges	☐ yes ☐ no ☐ N/A
(B) Describes storage and handling of chemicals	☐ yes ☐ no ☐ N/A
(C) Procedures for immediate notification to POTW of slug discharges	☐ yes ☐ no ☐ N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	☐ yes ☐ no ☐ N/A
2. Describes procedures and equipment for emergency response	☐ yes ☐ no ☐ N/A
3. Describes follow-up to limit damage suffered by POTW or environment	☐ yes ☐ no ☐ N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☐ no ☐ N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no ☐ N/A
If no:	
Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☐ no
Is it posted in areas where chemicals are used and stored?	☐ yes ☐ no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no
Have there been any non-routine, episodic discharges or chemical spills in the past year?	☐ yes ☐ no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? ☐ yes ☐ no ☒ N/A	
Visual Inspection of Discharge Lines/Points	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point	
Total Flow Monitoring Point	
Upstream Manhole	
Point of Connection:	

[1]**This facility has a spill plan for floor and outdoor surface spills only; no plant spills can accidentally enter the POTW. The floor plan is mainly to prevent the spills from leaving the plant and reaching the outside surface.**

Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements				
Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title.				
Samples are collected at the weir box prior to the location where the wastewater is discharged to the POTW. Plant staff takes the lab samples.				
Where is the sample point located?				
☐ End of Process	☒ Pretreatment Effluent	☐ Total Flow		
☐ Combined Flow	☐ Metered Flow	☐ Flow Actuator		
☐ Private Manhole	☐ Utility Manhole	☐ Advance Notice Required		
☐ Safety Hazards Identified	☐	☐		
Is the Sample Collection Site Adequate?		☒ Yes ☐ No ☐ N/A		
Does the facility rep. request a split sample on this sampling/inspection?		☐ Yes ☒ No		
Does the facility perform self-monitoring tests in-house?		☐ Yes ☒ No ☐ N/A		
If no, record the name and address of Contract Lab:				
American Interplex Cor.				
Automatic Sampler ☐ or Manual ☒ **Batch WW Treatment implies Grab samples are acceptable.**				
IU Self-Monitoring Results reviewed:		☐ Yes ☐ No ☐ N/A		
Is the Contract Lab certified by ADEQ for test parameters?		☒ Yes ☐ No ☐ N/A		
Dates and Times of Sample Analysis Recorded?		☒ Yes ☐ No ☐ N/A		
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)		☒ Yes ☐ No ☐ N/A		
EPA recommended holding times being met (Refer to 40CFR Part 136)		☒ Yes ☐ No ☐ N/A		
Chain of Custody Records for Self-Monitoring Samples Reviewed		☒ Yes ☐ No ☐ N/A		
Were correct Sample Types Collected		☒ Yes ☐ No ☐ N/A		
Dates and times of Sample Collection Recorded?		☒ Yes ☐ No ☐ N/A		
Were Samples preserved correctly (refer to 40CFR Part 136)		☒ Yes ☐ No ☐ N/A		
Were Self Monitoring records on file for past 3 years?		☒ Yes ☐ No ☐ N/A		
List the parameters the facility monitors and the frequency:				
☐ Cd(t)	☐ Cu(t) **2 per year**	☐ Cr(t) **2 per year**	☐ Ni(t)	☐ Pb(t)
☐ Ag(t)	☐ Zn(t) **2 per year**	☐ pH	☐ CN^-(t) **2 per year**	☐ CN^-(a-c)
☐ TTO-Vol	☐TTO-B/N	☐TTO-A.E.	☐TTO-Pest	☐ Cr(hex)
☐	☐	☐	☐	☐
Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433				
How does the IU report TTO? ☐Analysis ☐ Certification Statement				
Does the facility have a Toxic Organic Management Plan? ☐ Yes ☐ No ☒ N/A				
If yes, Does the plan show how toxic organics are used, stored, and disposed? ☐ Yes ☐ No ☐ N/A				
List the date of the last revision to the TOMP:				
Is the TOMP being followed as written? ☐ Yes ☐ No ☐N/A (If no, provide explanation in comments.)				
If no, is there evidence that a TOMP is needed? ☐Yes ☐ No ☐ N/A (If yes, provide description of evidence in comments.)				
Comments:				

5301 Northshore Drive
North Little Rock, AR 72118
Telephone: 501-682-0744

Client Report For: American Coated Products CSI 2013 2550
Attention:
Client Address:
,

Report Date: August 02, 2013
LAB ID: AR13JUL18-01
Comment:

Approved By:_____ Date:August 02, 2013

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Liitle Rock, AR 72118

Laboratory Contact: Jeff Ruehr
Ruehr@adeq.state.ar.us
501-682-0955

Client:	CSI	**Client Sample ID:**	AMX
Lab ID:	2013-2550	**Collection Date:**	7/17/2013 12:44:00 PM
		Matrix:	Water

Analyses

Total Metals by EPA 200.8 ***EPA 200.8*** ***Batch: 13080103*** ***Run: 1***

	Result	Reporting Limit	MDL	Qual	Unit
Aluminum	38.4	20	20		ug/L
Antimony	<10	10	5		ug/L
Arsenic	<1	1	0.5		ug/L
Barium	<10	10	2.0		ug/L
Beryllium	<0.5	0.5	0.1		ug/L
Boron	39.0	25	5.0		ug/L
Cadmium	<1	1	0.3		ug/L
Calcium	0.564	0.04	0.04		mg/L
Chromium	<1	1	0.3		ug/L
Cobalt	<1	1	0.5		ug/L
Copper	<1	1	0.5		ug/L
Iron	148	20	10.0		ug/L
Lead	<1	1	0.1		ug/L
Magnesium	1.30	0.1	0.1		mg/L
Manganese	82.5	1	0.2		ug/L
Nickel	52.0	2.5	0.5		ug/L
Potassium	6.63	1	0.05		mg/L
Selenium	<2	2	0.5		ug/L
Silver	<5	5	1.0		ug/L
Sodium	44.9	0.04	0.02		mg/L
Thallium	<2.5	2.5	0.05		ug/L
Vanadium	<2.5	2.5	1.0		ug/L
Zinc	43.6	3	2.0		ug/L
Dilution Factor	1				
Analyzed By	Robert Graddy				
Analysis Date/Time	Jul 25 2013 4:15PM				
Prep By					
Prep Date/Time					

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Liitle Rock, AR 72118

Laboratory Contact: Jeff Ruehr
Ruehr@adeq.state.ar.us
501-682-0955

Analytical Quality Control Results Report

Batch: 13080103	ICP Metals - water (total)
AMX	LIMS ID: 2013-2550

ICP Metals - water (Total) DUP — Run: 1

Parameter	Result	DL	RL	Accuracy Control	Precision Control
Aluminum	38.0 ug/L	20	20		
Aluminum (RPD)	1.0 %				0 - 20
Antimony (RPD)	0 %				0 - 20
Antimony	<10 ug/L	5	10		
Arsenic	<1 ug/L	0.5	1		
Arsenic (RPD)	200 %				0 - 20
Barium (RPD)	0.9 %				0 - 20
Barium	<10 ug/L	2	10		
Beryllium	<0.5 ug/L	0.1	0.5		
Beryllium (RPD)	0 %				0 - 20
Boron (RPD)	0 %				0 - 20
Boron	39 ug/L	5	25		
Cadmium	<1 ug/L	0.3	1		
Cadmium (RPD)	2.2 %				0 - 20
Calcium (RPD)	1.4 %				0 - 20
Calcium	0.572 mg/L	0.04	0.04		
Chromium	<1 ug/L	0.3	1		
Chromium (RPD)	7.9 %				0 - 20
Cobalt (RPD)	1.6 %				0 - 20
Cobalt	<1 ug/L	0.5	1		
Copper	<1 ug/L	0.5	1		
Copper (RPD)	5.1 %				0 - 20
Iron (RPD)	0.3 %				0 - 20
Iron	148 ug/L	10	20		
Lead	<1 ug/L	0.1	1		
Lead (RPD)	2.5 %				0 - 20
Magnesium (RPD)	0.2 %				0 - 20
Magnesium	1.29 mg/L	0.1	0.1		
Manganese	83 ug/L	0.2	1		
Manganese (RPD)	0.4 %				0 - 20
Nickel (RPD)	0.2 %				0 - 20

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Nickel	52 ug/L	0.5	2.5		
Potassium (RPD)	1.5 %				0 - 20
Potassium	6.53 mg/L	0.05	1		
Selenium	<2 ug/L	0.5	2		
Selenium (RPD)	0 %				0 - 20
Silver (RPD)	0 %				0 - 20
Silver	<5 ug/L	1	5		
Sodium	44.7 mg/L	0.02	0.04		
Sodium (RPD)	0.4 %				0 - 20
Thallium (RPD)	2.4 %				0 - 20
Thallium	<2.5 ug/L	0.05	2.5		
Vanadium	<2.5 ug/L	1	2.5		
Vanadium (RPD)	10.4 %				0 - 20
Zinc (RPD)	0 %				0 - 20
Zinc	43.6 ug/L	2	3		
Dilution Factor	1				
Analyzed By	Robert Graddy				
Analysis Date/Time	Jul 25 2013 4:21PM				

AMERIMAX EQUAL LIMITS HELENA, Arkansas

This spreadsheet determines "Equal" limits for the Amerimax facility in Helena based on two regulated process, 40CFR465.25 Galvanized Basis Material and 40CFR465.35 Aluminum Basis Material
The plant has only one production line which runs either steel or aluminum.
The math model for the Amerimax facility is equivalent to "two independent plants" (one plant which runs only aluminum and the other which runs only galv steel). Therefore, Amerimax must take two samples, one sample when the line is running aluminum and the second sample when the line is running galvanized steel.
Take a "representative sample" at the weir for each "plant" during the six month period.

Note that the days of production are not relevant to the calculations in this spreadsheet since Amerimax is instructed to enter "totals" (production square footage and volume in gallons of wastewater) for the six month period.
Also note that the model simulates two huge treatment tanks; one tank collects all the wastewater from the "alum plant" and the other tank collects all the wastewater from the "galv plant".

40CFR465.25 Galvanized Steel	10155790	Enter total sqaure footage of steel for the six month period
40CFR465.35 Aluminum	71773058	Enter total sqaure footage of aluminum for the six month period
40CFR465.25 Discharge Volume	53569.35271	Enter total volume of wastewater in gallons discharged from "steel plant"
40CFR465.35 Discharge Volume	489266.0502	Enter total volume of wastewater in gallons discharged from "alum plant"

Parameter	Galv Max Limit (mg/l)	Galv Ave Limit (mg/l)	Alum Max Limit (mg/l)	Alum Ave Limit (mg/l)
Chromium	*Not Applicable*	0.242	*Not Applicable*	0.259
Copper	*Not Applicable*	0.978	*Not Applicable*	*Not Applicable*
Cyanide	*Not Applicable*	0.130	*Not Applicable*	0.137
Zinc	*Not Applicable*	0.698	*Not Applicable*	0.720