

## Wilson, Tabatha

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**From:** Gilliam, Allen  
**Sent:** Friday, March 21, 2014 12:13 PM  
**To:** sgately@trinityconsultants.com; oshirley@amerimax.com  
**Cc:** Fuller, Kim; Wilson, Tabatha  
**Subject:** AR0043389\_Amerimax ARP001044 AFIN 54-00132 February 2014 Semi-Annual Report with ADEQ reply regarding compliance cannot be determined\_20140321  
**Attachments:** Amerimax Helena (AFIN 54-00132) Semi-Annual Waste Water Pretreatment Report.pdf; BMR General Form 2012.doc

Seth and Onika,

Amerimax' February 2014 semi-annual Pretreatment report was received and reviewed. With the confusing information on Amerimax' processes (flows, ft<sup>2</sup> of area processed, comprehensive process/pretreatment description and comprehensive regulated wastewater flow diagram with accurate volume – avg. daily flow [in gallons/day] per subpart and a comprehensive regulated wastewater flow schematic from its source(s) through the pretreatment system to the exact sampling point), this office cannot ascertain compliance or non-compliance with Amerimax' 40 CFR 465 – Coil Coating, Subpart B (Galvanized Basis) and Subpart C (Aluminum Basis) standards.

Please provide this office with the above underlined process(es) description and wastewater flow schematics (with directional flow arrows) making no assumptions regarding flow or production per subpart within fifteen (15) working days of the date on this correspondence. This information is required in 40 CFR 403.12(b), the Baseline Monitoring Report (BMR).

The only BMR found on "file" was Alumax' signed and dated 11/27/95 by Dennis Sullivan. No process description nor a regulated wastewater flow diagrams could be located.

A new BMR (attached) should also be re-sent since owners and signatory authorities have changed since that time. A qualified professional should draft the process(es) description and regulated wastewater flow schematic.

My apologies for this tardy response, but this office could not duplicate any of your limits. Please use the English system of units for future reports. This office will assist Amerimax calculate appropriate limits using EPA's guidance on production based limits. Amerimax, in turn, can repeat this exercise for future reports.

If there is only one line which coats both the aluminum and the galvanized coils at different times, Amerimax may very well have to begin more frequent sampling/reporting when each separate line's wastewater is pretreated and discharged to the City. This practice was mentioned in Rufus Torrence's e-correspondence to Mr. Dan Roach on 3/6/13.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

## E/NPDES/NPDES/Pretreatment/Reports

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**From:** Seth Gately [<mailto:SGately@trinityconsultants.com>]  
**Sent:** Friday, February 28, 2014 12:59 PM  
**To:** Gilliam, Allen  
**Subject:** AR0043389 AFIN 54-00132 February 2014 Semi-Annual Report

Mr. Gilliam,

Attached is the Semi-Annual Waste Water Pretreatment report for Amerimax in Helena, AR (AR0043389 AFIN 54-00132).

Thank you very much and have a nice weekend.

.....  
**Seth Gately**  
Consultant

### **Trinity Consultants**

11225 Huron Lane, Suite 212 | Little Rock, Arkansas 72211

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# SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR465

Use of this form is not an EPA/PC&E requirement.

Attn: Water Div/NPDES Pretreatment

## (1) IDENTIFYING INFORMATION

**A. LEGAL NAME & MAILING ADDRESS**

**Amerimax Coated Products, Inc.**  
**215 Phillips 324 Road**  
**Helena, AR 72342**

**B. FACILITY & LOCATION ADDRESS**

**Amerimax Coated Products, Inc.**  
**215 Phillips 324 Road**  
**Helena, AR 72342**

**C. FACILITY CONTACT:** **Onika Shirley**

**TELEPHONE NUMBER:** **(870) 572-5074**

## (2) REPORTING PERIOD--FISCAL YEAR From Aug 1 to Jul 31 (Both Semi-Annual Reports must cover Fiscal Year)

**A. MONTHS WHICH REPORTS ARE DUE**

August & February

**B. PERIOD COVERED BY THIS REPORT**

**FROM:** **September 2013**      **TO:** **February 2014**

## (3) DESCRIPTION OF OPERATION

**A. REGULATED PROCESSES**

**40 CFR Part 465 -- Coil Coating Point Source Category**

<u>PROCESS*</u>	<u>PROD'N RATE(S)</u> Total for Six Months	<u>PROD'N DAYS</u> Number of Operating Days
Subpart A Steel	<u>N/P</u>	<u>                    </u>
Subpart B Galv	<u>10,005,099 ft<sup>2</sup></u>	<u>22</u>
Subpart C Alum	<u>60,558,386 ft<sup>2</sup></u>	<u>127</u>
Subpart D Canmak	<u>N/P</u>	<u>                    </u>

\*Show Rate & Days--If process is not present, show "Not Present" or "N/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.

**C. Number of Regular Employees at this Facility** 42

**D. [Reserved]**

**(4) FLOW MEASUREMENT (CON'D)**

**B. INDIVIDUAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY (gpd)**

Operation	Ave Tot Flow <sup>1</sup>	Max Tot Flow <sup>2</sup>	Type of Discharge	No. Disc Days
Regulated: Steel Basis	N/P			
Regulated: Galv Basis	783.0	9900.9		22
Regulated: Alum Basis	783.0	9900.9		127
Regulated: Canmaking	N/P			
Total Regulated				
§403.6(e) Unregulated <sup>3</sup>				
§403.6(e) Dilute				
Cooling Water				
Sanitary	1,425	1,425	continuous	
Total Flow to POTW			*****	*****

<sup>1</sup>"Ave Tot Flow" is the average of "total gallons discharged in a 24-hour day" during the reporting period. Note that "Ave Tot Flow" times "No. Disc Days" must equal the actual total gallons discharged to the POTW for this six month period.

<sup>2</sup>"Max Tot Flow" is the maximum "total gallons discharged in a 24-hour day" during the reporting period.

<sup>3</sup>"Unregulated" has a precise legal meaning; see 40 CFR403.6(e).

**(5) MEASUREMENT OF POLLUTANTS**

**A. TYPE OF TREATMENT SYSTEM**  
CHECK EACH APPLICABLE BLOCK

- Neutralization
- Chemical Precipitation and Sedimentation
- Chromium Reduction
- Cyanide Destruction
- Other Filter Press
- None

**B. COMMENTS ON TREATMENT SYSTEM**

**C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS ON THE EFFLUENT FROM ALL REGULATED PROCESSES-- (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.**

Pollutant	Cd	Cr	Cu	Pb	Ni	Ag	Zn	O&G	CN*	Phen	TTO*
MEC (mg/l)		N/A	N/A				N/A		N/A		
AEC (mg/l)		1.08 Alum 0.74 Galv	2.99 Galv				2.99 Alum 2.14 Galv		0.57 Alum 0.40 Galv		
AMMC (mg/l)		0.11 Alum <0.007 Galv	0.0067 Galv				0.11 Alum 0.047 Galv		<0.01 Alum and Galv		
AMAC (mg/l)		0.11 Alum <0.007 Galv	0.0067 Galv				0.11 Alum 0.047 Galv		<0.01 Alum and Galv		

\*Provide Conc for February report; the certification may be submitted for the August report if it is applicable.

Sample Location FINAL EFFLUENT TANK

Sample Type (Grab or Composite) GRAB

Number of Samples and Frequency Collected 2 - SEMIANNUALLY

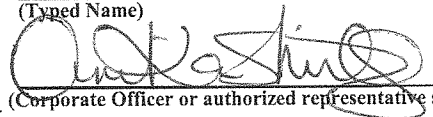
40CFR136 Preservation and Analytical Methods Use:  Yes  No

(6) CERTIFICATION

A. CHECK ONE:  CYANIDE ANALYSIS ATTACHED PROVIDED BELOW  EPA REGION VI CYANIDE CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with pretreatment standards, I certify that, to the best of my knowledge, cyanide has not been used or generated in our processes, which are regulated by the Coil Coating [40 CFR 465.03(a)] categorical pretreatment standards, since we filed the February semi-annual compliance report; the cyanide analysis, in the February report of this calendar year contain less than 0.07 mg/l. I understand that I can submit this certification for only the August report.

Onika Shirley  
(Typed Name)

  
(Corporate Officer or authorized representative signature)

Date of Signature 02/26/14

B. [Reserved]

[RESERVED]

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS )  
COUNTY OF \_\_\_\_\_ )

Before me, the undersigned authority, on this day personally appeared \_\_\_\_\_ of \_\_\_\_\_ a corporation, known to me to be the person whose name is subscribed to the foregoing instrument(s), and acknowledged to me that he executed the same for purposes and considerations therein expressed, in the capacity therein stated and as the act and deed of said corporation.

Given under my hand and seal of office on this \_\_\_\_\_ day of \_\_\_\_\_, 2004.

Notary Public in and for \_\_\_\_\_  
County, Arkansas

My commission expires \_\_\_\_\_.

**(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:


**(8) GENERAL COMMENTS**

**(9) SIGNATORY REQUIREMENTS [40CFR403.12(l)]**

I certify under penalty of law that I have personally examined and am familiar with the information in this semi-annual compliance report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Onika Shirley  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Plant Manager  
OFFICIAL TITLE

  
SIGNATURE  
02/26/14  
DATE SIGNED

TOTAL	3048	528	116,669	99,442	17,226
	Alum Hours	Galv Hours	Total Gal	Alum Gal	Galv Gal

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### Amerimax Average Flows and Rates for the Six Month Period

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	Aluminum	Galvanized	
Average Flow (GPD) per Six Months =	546.39	94.65	gpd
Average Production Rate (sq-ft/day) =	30,924	5,109	sq-m/day

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### Allowable Limits for the Six Month Period

To Determine the Allowable Limit (mg/l). Amerimax may use actual volumes (liters) and the coated surface area (sq-m). Therefore, the volume of wastewater discharged in the six month period for each operation equals:

Alum:	Total Alum gallons X 3.785 liters/gallon=	376,389 liters
Galv:	Total Galv gallons X 3.785 iters/gallon =	65,201 liters

The surface area coated for each operation equals:

Alum:	total sq-ft / 10.76 sq-ft/sq-meter=	5,628,103 sq-meters	60,558,386 sq-feet
Galv:	total sq-ft / 10.76 sq-ft/sq-meter=	929,842 sq-meters	10,005,099 sq-feet

The allowable milligrams of metals in the wastewater for the six month period is:

	Galvanized	
Chromium:	0.052 mg/sq-m X 929842 sq-m =	48,352 mg
Copper:	0.21 mg/sq-m X 929842 sq-m =	195,267 mg
Cyanide:	0.028 mg/sq-m X 929842 sq-m =	26,036 mg
Zinc:	0.15 mg/sq-m X 929842 sq-m =	139,476 mg

	Aluminum	
Chromium:	0.72 mg/sq-m X 5628103 sq-m =	405,223 mg
Cyanide:	0.038 mg/sq-m X 5628103 sq-m =	213,868 mg
Zinc:	0.20 mg/sq-m X 5628103 sq-m =	1,125,621 mg

The math model assumes two plants (one which coats alum and the other coats galv). We can also assume that an the wastewater during a six month period is captured In two tanks. One tank contains all the wastewater for the alum plant and has 376389 liters in it. The other tanks contains all the wastewater from the galv plant and has 65201 liters in it. The concentrations of metals in the tanks are:

	Galvanized	
Chromium:	48352 mg / 65201 liters =	0.74 mg/l
Copper:	195267 mg / 65201 liters =	2.99 mg/l
Cyanide:	26036 mg / 65201 liters =	0.40 mg/l
Zinc:	139476 mg / 65201 liters =	2.14 mg/l

	Aluminum	
Chromium:	405223 mg / 376389 liters =	1.08 mg/l
Cyanide:	213868 mg / 376389 liters =	0.57 mg/l
Zinc:	1125621 mg / 376389 liters =	2.99 mg/l




Amerimax Coated Products, Inc.  
ATTN: Ms. Onika Shirley  
215 Phillips 324 Road  
Helena, AR 72342

This report contains the analytical results and supporting information for samples submitted on February 14, 2014. 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 Laboratory Director or a qualified designee.



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John Overbey  
Laboratory Director





Amerimax Coated Products, Inc.  
215 Phillips 324 Road  
Helena, AR 72342

### SAMPLE INFORMATION

#### Project Description:

Two (2) water sample(s) received on February 14, 2014  
P.O. No. AME 022014

#### Receipt Details:

A Chain of Custody was not 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>
175403-1	Steel 2-12-14 1:00	12-Feb-2014 1300	1
175403-2	Alum 2-12-14 09:00	12-Feb-2014 0900	1

#### Notes:

1. Received temperature of samples did not meet regulatory requirements

#### Qualifiers:

- D Result is from a secondary dilution factor
- X Spiking level is invalid due to the high concentration of analyte in the spiked sample

#### 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", 21st edition.  
"American Society for Testing and Materials" (ASTM).  
"Association of Analytical Chemists" (AOAC).

Amerimax Coated Products, Inc.  
215 Phillips 324 Road  
Helena, AR 72342

**ANALYTICAL RESULTS**

**AIC No. 175403-1**

**Sample Identification: Steel 2-12-14 1:00**

<b>Analyte</b>		<b>Result</b>	<b>RL</b>	<b>Units</b>	<b>Qualifier</b>
<b>Total Cyanide</b>		<b>&lt; 0.01</b>	<b>0.01</b>	<b>mg/l</b>	
SM 4500-CN C,E 1999	Prep: 17-Feb-2014 0804 by 308	Analyzed: 17-Feb-2014 1223 by 308		Batch: W46651	
<b>Aluminum</b>		<b>0.35</b>	<b>0.04</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1505 by 305		Batch: S36256	
<b>Arsenic</b>		<b>&lt; 0.05</b>	<b>0.05</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1505 by 305		Batch: S36256	
<b>Chromium</b>		<b>&lt; 0.007</b>	<b>0.007</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1505 by 305		Batch: S36256	
<b>Copper</b>		<b>0.0067</b>	<b>0.006</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1505 by 305		Batch: S36256	
<b>Iron</b>		<b>0.54</b>	<b>0.007</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1505 by 305		Batch: S36256	
<b>Nickel</b>		<b>0.028</b>	<b>0.01</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1505 by 305		Batch: S36256	
<b>Zinc</b>		<b>0.047</b>	<b>0.002</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1505 by 305		Batch: S36256	

**AIC No. 175403-2**

**Sample Identification: Alum 2-12-14 09:00**

<b>Analyte</b>		<b>Result</b>	<b>RL</b>	<b>Units</b>	<b>Qualifier</b>
<b>Total Cyanide</b>		<b>&lt; 0.01</b>	<b>0.01</b>	<b>mg/l</b>	
SM 4500-CN C,E 1999	Prep: 17-Feb-2014 0804 by 308	Analyzed: 17-Feb-2014 1225 by 308		Batch: W46651	
<b>Aluminum</b>		<b>0.81</b>	<b>0.04</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1511 by 305		Batch: S36256	
<b>Arsenic</b>		<b>&lt; 0.05</b>	<b>0.05</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1511 by 305		Batch: S36256	
<b>Chromium</b>		<b>0.11</b>	<b>0.007</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1511 by 305		Batch: S36256	
<b>Copper</b>		<b>0.020</b>	<b>0.006</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1511 by 305		Batch: S36256	
<b>Iron</b>		<b>0.78</b>	<b>0.007</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1511 by 305		Batch: S36256	
<b>Nickel</b>		<b>0.052</b>	<b>0.01</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1511 by 305		Batch: S36256	
<b>Zinc</b>		<b>0.11</b>	<b>0.002</b>	<b>mg/l</b>	
EPA 200.8	Prep: 14-Feb-2014 1404 by 271	Analyzed: 14-Feb-2014 1511 by 305		Batch: S36256	

Amerimax Coated Products, Inc.  
215 Phillips 324 Road  
Helena, AR 72342

**LABORATORY CONTROL SAMPLE RESULTS**

<u>Analyte</u>	<u>Spike Amount</u>	<u>%</u>	<u>Limits</u>	<u>RPD</u>	<u>Limit</u>	<u>Batch</u>	<u>Preparation Date</u>	<u>Analysis Date</u>	<u>Dil</u>	<u>Qual</u>
Total Cyanide	0.1 mg/l	109	85.0-115			W46651	17Feb14 0805 by 308	17Feb14 1215 by 308		
Aluminum	0.05 mg/l	90.9	85.0-115			S36256	14Feb14 0902 by 271	14Feb14 1428 by 305		
Arsenic	0.05 mg/l	91.6	85.0-115			S36256	14Feb14 0902 by 271	14Feb14 1428 by 305		
Chromium	0.05 mg/l	90.8	85.0-115			S36256	14Feb14 0902 by 271	14Feb14 1428 by 305		
Copper	0.05 mg/l	97.8	85.0-115			S36256	14Feb14 0902 by 271	14Feb14 1428 by 305		
Iron	5 mg/l	91.5	85.0-115			S36256	14Feb14 0902 by 271	14Feb14 1428 by 305		
Nickel	0.05 mg/l	90.1	85.0-115			S36256	14Feb14 0902 by 271	14Feb14 1428 by 305		
Zinc	0.05 mg/l	100	85.0-115			S36256	14Feb14 0902 by 271	14Feb14 1428 by 305		

**MATRIX SPIKE SAMPLE RESULTS**

<u>Analyte</u>	<u>Sample</u>	<u>Spike Amount</u>	<u>%</u>	<u>Limits</u>	<u>Batch</u>	<u>Preparation Date</u>	<u>Analysis Date</u>	<u>Dil</u>	<u>Qual</u>
Total Cyanide	175432-3	0.1 mg/l	107	75.0-125	W46651	17Feb14 0805 by 308	17Feb14 1220 by 308		
	175432-3	0.1 mg/l	105	75.0-125	W46651	17Feb14 0805 by 308	17Feb14 1222 by 308		
	Relative Percent Difference:		2.04	20.0	W46651				
Aluminum	175388-1	0.05 mg/l	-	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1614 by 305	10	X
	175388-1	0.05 mg/l	-	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1619 by 305	10	X
	Relative Percent Difference:		1.63	20.0	S36256				
Arsenic	175388-1	0.05 mg/l	86.9	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1434 by 305		
	175388-1	0.05 mg/l	87.3	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1439 by 305		
	Relative Percent Difference:		0.551	20.0	S36256				
Chromium	175388-1	0.05 mg/l	78.8	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1434 by 305		
	175388-1	0.05 mg/l	79.6	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1439 by 305		
	Relative Percent Difference:		0.946	20.0	S36256				
Copper	175388-1	0.05 mg/l	-	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1614 by 305	10	X
	175388-1	0.05 mg/l	-	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1619 by 305	10	X
	Relative Percent Difference:		0.425	20.0	S36256				
Iron	175388-1	5 mg/l	-	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1434 by 305		X
	175388-1	5 mg/l	-	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1439 by 305		X
	Relative Percent Difference:		0.700	20.0	S36256				
Nickel	175388-1	0.05 mg/l	96.7	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1434 by 305		
	175388-1	0.05 mg/l	100	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1439 by 305		
	Relative Percent Difference:		3.40	20.0	S36256				
Zinc	175388-1	0.05 mg/l	-	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1614 by 305	10	X
	175388-1	0.05 mg/l	-	75.0-125	S36256	14Feb14 0902 by 271	14Feb14 1619 by 305	10	X
	Relative Percent Difference:		0.0310	20.0	S36256				



Amerimax Coated Products, Inc.  
215 Phillips 324 Road  
Helena, AR 72342

**LABORATORY BLANK RESULTS**

<b>Analyte</b>	<b>Result</b>	<b>RL</b>	<b>PQL</b>	<b>QC Sample</b>	<b>Preparation Date</b>	<b>Analysis Date</b>	<b>Qual</b>
Total Cyanide	< 0.01 mg/l	0.01	0.01	W46651-1	17Feb14 0805 by 308	17Feb14 1459 by 308	
Aluminum	< 0.04 mg/l	0.04	0.04	S36256-1	14Feb14 0902 by 271	14Feb14 1423 by 305	
Arsenic	< 0.05 mg/l	0.05	0.05	S36256-1	14Feb14 0902 by 271	14Feb14 1423 by 305	
Chromium	< 0.007 mg/l	0.007	0.007	S36256-1	14Feb14 0902 by 271	14Feb14 1423 by 305	
Copper	< 0.006 mg/l	0.006	0.006	S36256-1	14Feb14 0902 by 271	14Feb14 1423 by 305	
Iron	< 0.007 mg/l	0.007	0.007	S36256-1	14Feb14 0902 by 271	14Feb14 1423 by 305	
Nickel	< 0.01 mg/l	0.01	0.01	S36256-1	14Feb14 0902 by 271	14Feb14 1423 by 305	
Zinc	< 0.002 mg/l	0.002	0.002	S36256-1	14Feb14 0902 by 271	14Feb14 1423 by 305	

**ADEQ BASELINE MONITORING REPORT [BMR]**  
**For Categorical Indirect Dischargers**

Instructions: In accordance with **40 CFR 403.12(b)** Industrial Users subject to categorical Pretreatment Standards are required to submit to ADEQ a report which contains the information in paragraphs **(b)(1)-(7)**. The User is responsible for submitting a complete and accurate report. The User must complete this form in as much detail as possible. Include additional information on attached sheets as necessary where space is limited.

(1) Facility Identifying Information [**§403.12(b)(1)**]:

A. Legal Name: \_\_\_\_\_  
Mailing Address: \_\_\_\_\_  
\_\_\_\_\_ Zip: \_\_\_\_\_

B. Facility Name: \_\_\_\_\_  
Location: \_\_\_\_\_  
\_\_\_\_\_ Zip: \_\_\_\_\_

C. Name of Owners: \_\_\_\_\_  
Address: \_\_\_\_\_  
\_\_\_\_\_

D. Name of Pretreatment System Operators: \_\_\_\_\_ Class: \_\_\_\_\_  
\_\_\_\_\_ Class: \_\_\_\_\_  
\_\_\_\_\_ Class: \_\_\_\_\_

E. Facility Signatory Authority / Title: \_\_\_\_\_ / \_\_\_\_\_

F. Main wastewater compliance contact / Title: \_\_\_\_\_ / \_\_\_\_\_  
Phone number: \_\_\_\_\_ Cell #: \_\_\_\_\_  
e-mail address: \_\_\_\_\_

G. Number of Employees: \_\_\_\_\_ Number of Shifts: \_\_\_\_\_

H. Number of Months per Calendar Year which Plant normally operates: \_\_\_\_\_

I. Name of the City [Publicly Owned Treatment Works (POTW)] that receives the wastewater discharges from this facility. If this facility has other wastewater not connected to a sewerage system describe where that wastewater is discharged):  
\_\_\_\_\_  
\_\_\_\_\_

J. Provide the date the facility began discharging regulated wastewater to the POTW: \_\_\_\_\_

Date facility installed/commenced construction of the Categorical operation(s): \_\_\_\_\_

(2) User's Permits [**§403.12(b)(2)**]:

Describe all environmental control permits held by or for the facility:

Describe Title of the Permit	Permit No.	Issuing Office or Agency	Exp. Date

(3) Description of Operations [**§403.12(b)(3)**]:

A. List Basis Material where applicable (cold/hot rolled steel, aluminum, zinc, customer pre-cast/forged/machined , etc):

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B. List Chemicals (not trade names; attach first page of their MSDS) used in regulated process(es) (solvents, acids, caustics, aqueous cleaners, machining oils/lubricants/coolants, etc.) and their use/at what station:

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C. Provide a Comprehensive Narrative Description of the facility's wastewater activities/processes or other activities conducted and the Final Products. Denote any Pollution Prevention (P2) practices such as flow lines indicating in-situ filtration, counter-current flows, air knives, wet scrubber return water to baths, acid/caustic baths regeneration, etc. This description shall correspond to the schematic required in Section E.(ii) below:

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(3)A., B. & C. above can be submitted on separate sheets of paper.

D. Summarize each Categorical Process generating wastewater and what “Category” it is federally regulated under. See <http://water.epa.gov/scitech/wastetech/guide/industry.cfm> for Categoricals with Pretreatment Standards/Limits.

Process(es)	Federal Category [40 CFR 4 _____]	SIC Code(s)	NAICS Code(s)

E. Provide on separate sheets (if necessary):

- (i) A comprehensive schematic of parts-flow through each regulated process that generates federally regulated wastewater. These do not have to be to-scale, should preferably be submitted on 8.5” X 11” sheets of paper and can be neatly hand drawn if CAD is not available.
- (ii) A comprehensive schematic drawing showing all wastewater directional flows (regulated and unregulated), location of pretreatment system and discharge/sampling point. This schematic does not have to be to-scale and can be neatly hand drawn if CAD is not available. Several 8.5” X 11” sheets are preferable to one large facility layout, with a separate (numbered) legend sheet denoting separate process/pretreatment tanks, etc. This numbered legend page can identify what chemicals are being used per process (bath/station) performed without further complicating the separately numbered flow schematic.
- (iii) Provide on a separate sheet a comprehensive schematic of all wastewater pretreatment equipment (holding/mixing tanks, chemical injection points, clarifier, I/X, R/O activated carbon filtration, dissolved air flotation, sludge holding tank, sludge press/supernatant, etc) denoting wastewater flow direction. Show pretreatment system location in relation to process flows and sampling points on schematic required in (ii) above.
- (iv) Denote chemical storage areas (bulk storage, at work stations, outdoor, etc.)
- (v) Denote any floor drains and containment areas (curbs, secondary containment, below grade grated troughs pumped/gravity-flowed to pretreatment, etc).

(4) Flow Measurement [§403.12(b)(4)]:

A. Total Plant Flow in Gallons per Day (gpd)<sup>2</sup>:

Average \_\_\_\_\_ Maximum \_\_\_\_\_

{denote all the flows below if measured [M] or estimated [E]}

B. Individual Flows in Gallons per Day <sup>1</sup> (gpd); <u>Dilute</u> wastestreams include non-contact cooling water, sanitary waste, boiler blowdown, etc.	Average Flow Rate <sup>2</sup> (gpd)	Max. Flow Rate (gpd)	Type Discharge <sup>2</sup> and at what frequency (describe)	Discharged to City, hauled off-site or recycled (describe)
Regulated Streams				
Unregulated Streams [see 40 CFR 403.6(e) @ <a href="http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&amp;sid=4426253e998d3e29123d85d41ff0e500&amp;rgn=div8&amp;view=text&amp;node=40:29.0.1.1.4.0.1.6&amp;idno=40">http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&amp;sid=4426253e998d3e29123d85d41ff0e500&amp;rgn=div8&amp;view=text&amp;node=40:29.0.1.1.4.0.1.6&amp;idno=40</a> for definition]				
<u>Dilute Wastewater</u> <sup>3</sup>				
Non-Contact Cooling Water				
Boiler Blowdown				
Sanitary Wastewater				
De-I or R/O backwash				
Other non-regulated				

<sup>1</sup>Referring to 40 CFR403.6(e)(1) average flows must be for a 30-day period unless batch discharges are less frequent than monthly.

<sup>2</sup>Continuous or Batch. If batch discharged, do not normalize over a period of days; state measured amount per batch and at what frequency (monthly, once per 3 months, once per yr, etc.).

<sup>3</sup>Denote whether any of these wastestreams are combined with the regulated wastestream prior to pretreatment OR prior to the final sampling point. If any of these flows are combined with the regulated wastestream as alluded to above, the MAC and AAC values in Section (5)B. below will have to be calculated.



(5) Measurement of Pollutants in User's Discharge to POTW [§ 403.12(b)(5)]:

A. Regulated Flows: The industrial user must perform sampling and analysis of the effluent from all regulated processes which discharge into the POTW (after pretreatment). Provide the analytical data for the regulated processes in the appropriate space below. If facility's Metal Finishing regulated flow is the only flow that is sampled, the below limits apply.

mg/l or lb/day (depends on specific Category)									
40 CFR 4 _____ Limits	Pollutant								
Maximum daily									
Monthly Average* not to exceed									

\* Regardless of the number of samples analyzed, these limits must be met at a minimum.

B. Analysis of wastewater at sampling point. (Mark "N/A" if not applicable; AMMC & AMAC will cannot be N/A)  
In accordance with 40 CFR 403.6(e) an industrial user may sample and analyze the total plant flow and calculate an alternate concentration limit using the combined wastestream formula if regulated process flows are mixed with other flows prior to treatment and/or sampling. Record the analytical results for all regulated pollutants below. Record the calculated concentration limits as well as the actual measured concentrations.

40 CFR 4 _____ Regulated Pollutants (mg/l)									
MAC <sup>1</sup>									
AAC <sup>2</sup>									
AMMC <sup>3</sup>									
AMAC <sup>4</sup>									

1 MAC --- Maximum Alternate Concentration as determined by ADEQ {N/A if no dilution streams are mixed w/regulated streams prior to pretreatment or prior to sampling point}

2 AAC --- Average Alternate Concentration as determined by ADEQ {N/A if no dilution streams are mixed w/regulated streams prior to pretreatment or prior to sampling point}

3 AMMC --- Actual Measured Maximum Concentration from Lab results. *[Facility's results must include the (ADEQ certified) lab's results & QA sheet*

4 AMAC --- Actual Measured Average Concentration from Lab results. *along with a complete chain of custody]*

D. User Sample Location\*: \_\_\_\_\_

\*This location should be identified on the wastewater flow schematic required in Section 3.E.(ii) above.

Sample Type (Composite samples are required except where not feasible or where grab samples are specifically required)

Number of Samples Taken: \_\_\_\_\_ Frequency (Daily, Weekly, etc) \_\_\_\_\_

Analytical Methods Used (Must be in accordance with 40 CFR 136--for example: Meth. 200.8, 624, 625, etc.)

\_\_\_\_\_

(6) Certifications [**403.12(b)(5)(viii)** & **403.12(b)(6)**]:

**40 CFR 403.12(b)(6) Compliance Certification**

A. Are applicable categorical pretreatment standards being met on a consistent basis? YES \_\_\_ NO \_\_\_

B. If no, do you require:

(i) Additional operation and maintenance (O&M) to achieve compliance? YES \_\_\_ NO \_\_\_

(ii) New or additional pretreatment facilities to achieve compliance? YES \_\_\_ NO \_\_\_

**40 CFR 403.12(b)(5)(viii) Representative Certification**

I certify, to the best of my knowledge, that the sampling and analysis as shown in Section 5 above is representative of the User's normal work cycles and the expected Discharges to the POTW.

Print Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

In accordance with 40CFR403.12(b)(5)(viii) & (6) a qualified professional must complete and sign these certifications in the space below.

Name & Title \_\_\_\_\_  
Qualified Professional (Please Type or Print)

Signature \_\_\_\_\_

Date \_\_\_\_\_

(7) A. If additional O&M or new or additional pretreatment will be required to meet categorical pretreatment standards on a consistent basis, provide an explanation in an attachment. New sources must not commence discharge until compliance is possible.

B. Signatory Requirement [40 CFR 403.12(I)]

**40 CFR 403.12(I)(3) Authorization to Sign Environmental Reports**

I hereby authorize persons filling the position title of \_\_\_\_\_,  
responsible for the overall operation of the \_\_\_\_\_, Arkansas, to sign all regular  
reports required by National Pretreatment Standards--pursuant to ADEQ rules and/or Clean Water Act (CWA) regulations.  
This written authorization is provided in accordance with 40 CFR 403.12(I) and comparable state regulations.

\_\_\_\_\_  
*Corporate official name & title here*

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Date*

**40 CFR 403.6(a)(2)(ii) Certification**

I certify under penalty of law that I have personally examined and am familiar with the information in this Baseline Monitoring Report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

\_\_\_\_\_  
*Name of Authorized Representative (Please Type or Print)*

\_\_\_\_\_  
*Official Title (Please Type or Print)*

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Date*