### Henderson, Katie

**From:** Torrence, Rufus

Sent: Friday, September 07, 2012 8:13 AM

To: David Seiler
Cc: Henderson, Katie

Subject: AFIN 54-00132 AR0043389 Amerimax August 2012 Semi-Annual Report

Attachments: AMX Aug 2012 SAR Final.pdf



March 5, 2012

Mr. Dave Seiler Amerimax Coated Products 215 Phillips 324 Road Helena, AR 72342

Re: Amerimax February 2012 Semi-Annual Report (Permit No. AR000043389 AFIN 54-00132)

Dear Mr. Seiler:

The Department has reviewed the Amerimax's February 2012 Semi-annual Pretreatment Report and the report is complete. However, the Department has recommendations to improve future reporting.

The calculated allowable limits in the report were correct even though Amerimax did not properly normalize the flows. If Amerimax used the Excel spreadsheet attached to the Department's email dated July 21, 2011, then flows were not required (only total volumes). The correct normalized flow should be based on the days (182) in the six month period rather than "operating time-days". The correct normalized flow for the aluminum operation is 1773 gpd and for the galvanized operation is 134 gpd. However, the total production days for each operation is the total operating hours divided by 24.

The Department appreciates Amerimax's continued efforts in semi-annual reporting. If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us.

Sincerely,

The Jonence

Rufus Torrence, Pretreatment Engineer Water Division

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5301 NORTHSHORF DRIVE - NORTH-LITTLE ROCK - ARKANSAS 221 to 5317 - TELEPHONE 501 682-0244 / FAX 501 682 0880
www.gdeg.slore.gcus

#### 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	B. FACILITY & LOCATION ADDRESS
	Amerimax Coated Products, Inc. 215 Phillips 324 Road Helena, AR 72342	Amerimax Coated Products, Inc. 215 Phillips 324 Road Helena, AR 72342
	C. FACILITY CONTACT: Dave Seiler	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	B. PERIOD COVERED BY THIS REPORT
	August /&February //	FROM: March 2012 TO: August 2012
	(3) DESCRIPTION OF OPERATION	
	A. REGULATED PROCESSES	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.
	40 CFR Part 465 Coil Coating Point Source Category (1)	
P-rote.	PROCESS' PROD'N RATE(S) PROD'N DAYS  Subpart A Steel N/P  Subpart B Galv 644.715 m² 140.21  Subpart C Alum 5,448,473 m² 140.21  Subpart D Canmak N/P 250.42  Show Rate & Days-If process is not present, show "Not Present" or "N/P".  There is only one production sine in this plant; this sine runs both 921 van; zeul Aluminum russ.  Doth 921 van; zeul Aluminum russ.  D Production must be entered into ANPCAN in square feet  (10, 76 Sqft and Vusume in 921 un 31.785 siters)	AUGUST 2012 SAR Filed ate 20120905 Band by email dated
	C. Number of Regular Employees at this Facility 42	D. [Reserved]
$\sim$		

The total number of prod days must be less than 182 days (7x 26 week) => 182 days).

~	SEMI-ANNUAL REPO	RI COND FA	FORTH A LANGE	: Ameri	max
OW MI	EASUREMENT (CON'D)				
	B. INDIVIDUAL PROCESS FI	LOWS DISCHARGED T	O 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				
ey Z	Regulated: Galv Basis	1342416	12,125		140.2
ry3	Regulated: Alum Basis	1773 3×16	12,125		140.2
, -	Regulated: Canmaking				
	Total Regulated				

Regulated: Steel Basis				
Regulated: Galv Basis	134246	12,125		140.2
Regulated: Alum Basis	1773 23476	12,125		140.2
Regulated: Canmaking				
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>quot;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 <u>actual total gallons discharged to the POTW for this six month period.</u>
2"Max Tot Flow" is the maximum "total gallons discharged in a 24-hour day" during the reporting period.

MEASUREMENT	OF POL	LUTANTS					200				
TYPE OF TREATMEN  HECK EACH APPLIC  Neutralizat  Chemical I  Chromium  Cyanide De  Other Filt  None	ABLE BLO ion Precipitati Reduction	CK on and Sedin n	nentation	l		в. СОММІ	ENTS ON TR	EATMEN	f system		
C. THE INDUST (AFTER TREAT ANALYTICAL I NOT ACCEPTA	MENT, IF A	APPLICABLE). LECTED DURI	ATTACH NG THE R	THE LAB A	NALYSIS RIOD IN TE	WHICH SE IE SPACE	IOWS A MAX PROVIDED I	KIMUM; 1 BELOY: 7	ABULATE A	LL THE	
Pollutant	Cd	cr	Cu	Pb	Ni	Ag	Zu	0&G	CN <sup>2</sup>	Phen	тто
MEC (mg/l)		0.81	0.22				2.20		0.43		
AEC (mg/l)		0.32	0.10				0.90		0.17		
AMMC (mg/l)		<0.007 Alum <0.007 Galv	<0.006 Galv				0.27 Alum 0.83 Galv		<0.01 Alum <0.01 Galv		
AMAC (mg/l)		<0.007 Alum <0.007 Galv	<0.006 Galv		13		0.27 Alum 0.83 Galv		<0.01 Alum <0.01 Galv		
Provide Conc for Fe Sample Location Sample Type (G	FIN	AL EFFLUI	ENT TAN	K	J	st report if	it is applicabl	e.			
Number of Samp	les and F	requency Co	llected	2 - SE	MIANNI	JALLY_					
40CFR136 Prese	rvation a	ad Analytica	l Method	s Use: 🕸	Yes 🗆	No					

 $<sup>^3</sup>$  "Unregulated" has a precise legal meaning; see 40CFR 403.6(e).

ekerizen.	
F	RTIFICATION
	A. CHECK ONE: CYANIDE ANALYSIS ATTACHED PROVIDED BELOW
	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.
	David Seiler (Typed Name)  (Corporate Officer or authorized representative signature)
	Date of Signature 8/21/1 d
	B. [Reserved]
	,
	[RESERVED]
P	ORATE ACKNOWLEDGEMENT (Optional)
	STATE OF ARKANSAS ) COUNTY OF )
	Before me, the undersigned authority, on this day personally appeared
	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
	My commission expires

40CFR465 SEMI-ANNUAL REPORT CON'D FACILITY NAME: Amerimax

(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(I)]	
(9) SIGNATURE REQUIREMENTS [+0CFR+05.12(1)]	
I certify under penalty of law that I have personally examined and am familiar with the information in this semi-annucompliance 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.	al
$1) \neq 1 = 0$	
David Seiler NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE SIGNATURE	
Plant Manager 8/3//2	
OFFICIAL TITLE DATE SIGNED	

40CFR465 SEMI-ANNUAL REPORT CON'D FACILITY NAME: \_\_\_\_\_ Amerimax

TOTAL 3048.04 268.96 353809 322738.7 24384.3 Alum Hour: Galv Hours Tot Gal Alum Gal Galv Gal

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

Aluminum Galvanized

Average Flow (GPD) per Six Months =

1773.3

134.0 gpd

Average Production Rate (sq-ft/day) =

29936.66

3542.4 sq-m/day

#### Allowable Limits for the Six Month Period

To Determine the Allowable Limit (mg/l), Amerimax may use actual volumes (liters) and the coated surfa

Therefore, the volume of wastewater discharged in the six month period for each operation equals:

Alum:

Total Alum gallons X 3.785 liters/gallon =

1221566 liters

Galv:

Total Galv gallons X 3.785 liters/gallon =

92295 liters

The surface area coated for each operation equals:

Alum: Galv:

total sq-ft / 10.76 sq-ft/sq-meter = total sq-ft / 10.76 sq-ft/sq-meter = 5448473 sq-meters 644715 sq-meters

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

Galvanized

Chromium:

 $0.052 \text{ mg/sq-m} \times 644715 \text{ sq-m} =$ 

Copper: Cyanide: 0.21 mg/sq-m X 644715 sq-m =135390 mg 0.028 mg/sq-m X 644715 sq-m =18052 mg

Zinc:

0.15 mg/sg-m X 644715 sg-m =

96707 mg

33525 mg

Aluminum Chromium:

 $0.072 \text{ mg/sg-m} \times 5448473 \text{ sg-m} =$ 

392290 mg

Cyanide:

 $0.038 \text{ mg/sq-m} \times 5448473 \text{ sq-m} =$ 

207042 mg

Zinc:

 $0.20 \text{ mg/sq-m} \times 5448473 \text{ sq-m} =$ 

1089695 mg

0.36 mg/l

The math model assumes two plants (one which coats alum and the other coats galv). We can also assume that all the wastewater during a six month period is captured in two tanks. One tank contains all the wastewater for the alum plant and has 1,538,136 liters in it. The other tanks contains all the wastewater from the galv plant and has 133,906 liters in it. The concentrations of metals in the tanks are:

#### Galvanized:

Chromium:	33525	mg / 92295 liters =
		3

Copper: 135390 mg / 92295 liters = 1.47 mg/l Cyanide: 18052 mg / 92295 liters = 0.20 mg/l 96707 mg / 92295 liters = Zinc: 1.05 mg/l

Aluminum

Chromium: 392290 mg / 1,221,566 liters = 0.32 mg/l

207042 mg / 1,221,566 liters = Cyanide: 0.17 mg/l Zinc: 1089695 mg / 1,221,566 liters = 0.89 mg/l

# AMX\_Production\_Based\_Standards

AMERIMAX COAT HELENA, AR	ED PRODUCTS		
	arch 2012 to August 2012		
Total Flow for the Average Flow (gpo	ays		Data Entry Col 140.21 347,128 2,475.80 12,125.00
Galvanized Line Prod'n Rate (Total	Sq Footage for 3/1/2012 thru 8/31/2012)		6,937,138
	Sq Footage for 9/1/2011 thru 1/12/2012)	*******	58,625,565
, D = 21, - 3 f =	Tanana Alamainana	<u>Cr</u>	<u>CN</u>
465.35 Regulatory Plant Allo	imum Aluminum Allowance (mg/sqmeter) wable (mg/period) 3625565 / 10.76 * 0.18 = 980725)	0.18 980,725	0.095 517,605
465.25 Regulatory Plant Allo	imum Galvanized Steel Allowance (mg/sqmeter) wable (mg/period) 937138 / 10.76 * 0.13 = 83813)	0.13 83,813	0.07 45,130
	aximum		·
	owable (mg/day) 980725 + 83813) / 140.21 = 7592.54)	7592.54	4013.56
	bwable (mg/liter) 593 / 9370.91 = 0.81)	0.81	0.43
	d (mg/liter) (during aluminum production) d (mg/liter) (during galvanized production)	<0.007 <0.007	<0.01 <0.01
465.35 Regulatory Plant Allo	average Aluminum y Allowance (mg/sqmeter) wable (mg/period) 8625565 / 10.76 * 0.072 = 392290)	0.072 392,290	0.038 207,042
465.25 Regulatory Plant Allo (ex. Cr: 6	Average Galvanized Steel  / Allowance (mg/sqmeter)  wable (mg/period)  937138 / 10.76 * 0.052 = 33525)	0.052 33,525	0.028 18,052
Intoutui	y Average		

Plant Allowable (mg/day) (ex. Cr: (392290 + 33525) / 140.21 = 3037.02)	3037.02	1605.43
Plant Allowable (mg/liter) (ex. Cr: 3037 / 9370.91 = 0.32)	0.32	0.17
Measured (mg/liter) (during aluminum production) Measured (mg/liter) (during galvanized production)	<0.007 <0.007	<0.01 <0.01

The "Plant Allowable" for Galv & Alum should be compared with the analyses submitted by AMX; AMX must sample at least once during the time when the line is running Galv and at least once when the line is running Aluminum. The assumption made is that the one analysis is representative of the six mor period for the basis metal of concern.

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5	>																																																							production only				
																																									,125	max average							00000	Total 5 month			6month to	Aug-12	Jul-12	Jun-12	Apr-12 May-12	Mar-1:		
																																									347,128	Total flow							04/04/04/0	7	Alum		6month tot 58,625,565	0,900,140	9,514,687	10,442,645	10 574 447	10,594,016	Alum sq.ft	
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	9		24	9.128	7/16/2012 0:00	N
				1992.69	7/15/2012 0:00	_
	1,143		24	1143.08	7/14/2012 0:00	~
	141		24	140.617	7/13/2012 0:00	σ,
	3,887		2 5	3886.72	7/12/2012 0:00	Cz 1
	2 675		2 !	3674.71	7/11/2012 0:00	۰ د
	5,711		2 2	4810.//	7/19/2012 0:00	3 N
	3		2	3042.96	7/8/2012 0:00	
				1207.94	7/7/2012 0:00	7
	1		!	664,447	7/6/2012 0:00	o 0
	1,687		24 4	1686.96	7/5/2012 0:00	jn s
	4,073 2,669		2 2	4072.77 2669.04	7/3/2012 0:00	w a

40CFR465.25 Galvanized Steel 40CFR465.35 Aluminum 40CFR465.25 Discharge Volume 40CFR465.35 Discharge Volume

1137518 Enter total sqaure footage of steel for the six month period 8983140 Enter total sqaure footage of aluminum for the six month period 38878 Enter total volume of wastewater in gallons discharged from "steel plant" 308250 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)	g/I) Alum Max Limít (m	ig/I) Alum Ave Limit (mg/I)
Chromium	0.093 0.	0.037	0.129 0.052
Copper	0.316 0.	0.151 Not Applicable	Not Applicable
Cyanide	0.050 0.	0.020 0	0.027
Zinc	0.251 0.	0.108 0	0.143

\*