
SEPARATOR


54-00132


WATER NPDES


PRETREATMENT

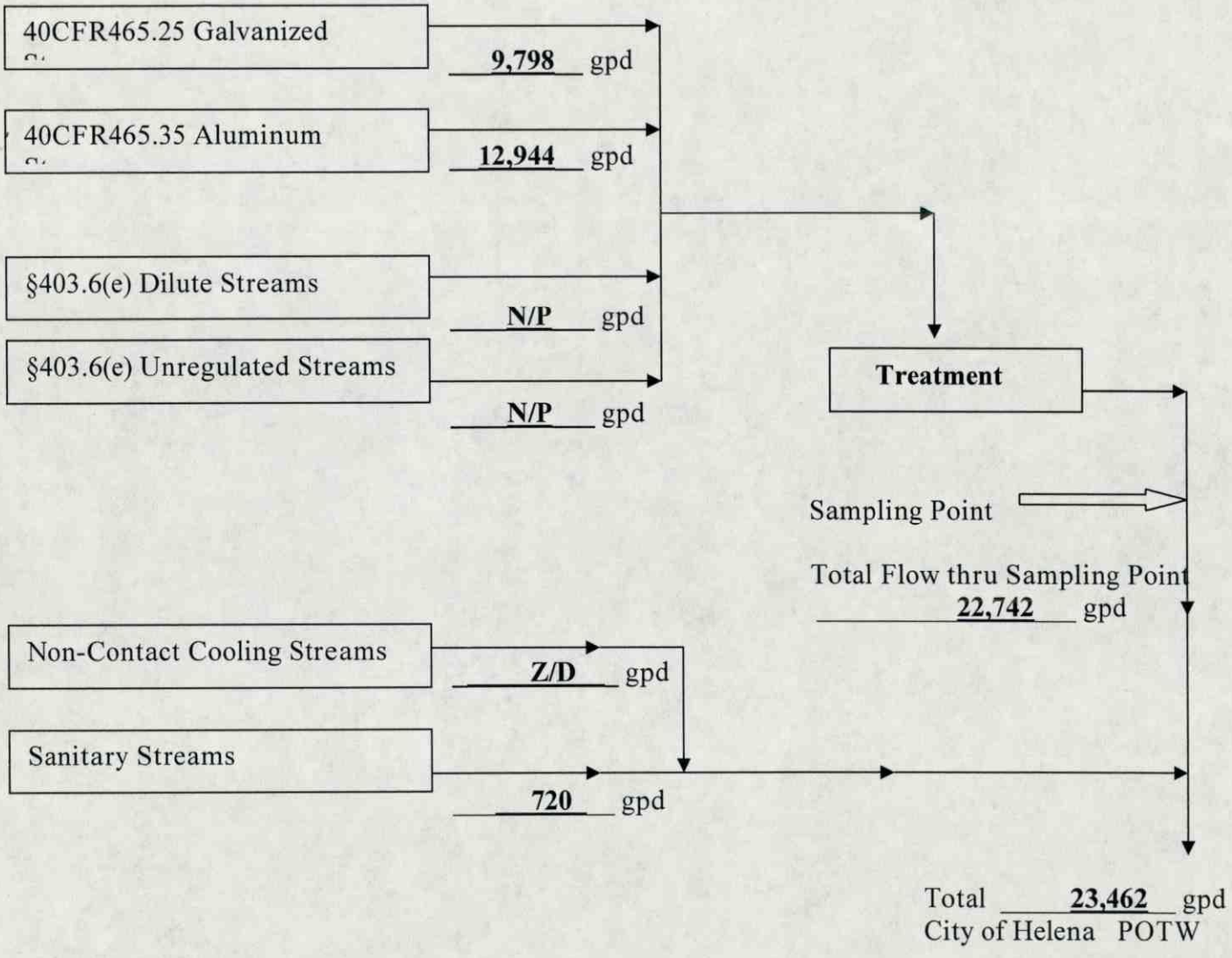

05/14/2003


ARP001044

Alun[illegible] Coated Products **Helena, Ar[illegible]sas**

PDF 5-15-06

§403.6(d) Dilution is not applicable to facilities with only prod-based streams.



If a stream is not present, show NOT PRESENT or N/P. If a stream is present, the wastewater can enter the POTW but currently has no flow, show 0.0 gpd. If a stream is present but the wastewater cannot enter the POTW, show Zero Discharge or Z/D. If an unregulated stream is present but the User has decided not to declare it at this time, show N/P.

Charles Anderson
Signature of §403.12(b) Professional

5/14/03
Date

I certify under penalty of law that I have personally examined and am familiar with the information in this document and that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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.

Charles Anderson
Plant Manager or the authorized §403.12(l) official

RECEIVED MAY 15 2003

5/14/03
Date

AMX_Diagram.doc (June 4, 2002)

FINAL BASELINE MONITORING REPORT FORM

PDF 3-15-06

PRODUCTION BASED CATEGORICAL INDUSTRY

Instructions: In accordance with 40CFR403.12(b) & (d) Industrial Users subject to categorical Pretreatment Standards are required to submit to PC&E a report which contains the information in paragraphs (b)(1)-(7). Use of this form is not an EPA requirement. The User is responsible for submitting a complete and accurate report. Nonetheless, the User may complete this form in as much detail as possible. Include additional information on attached sheets as necessary where space is limited.

Return to: Water Div/NPDES Pretreatment

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

A. Legal Name: ALUMAX COATED PRODUCTS INC.
Mailing Address: P. O. Box 2542
215 Phillips 324 Alumax Dr.
West Helena, AR. Zip: 72390

B. Facility Name: Sameas A
Location:
Zip:

C. Name of Owners: ALUMAX COATED PRODUCTS INC.

D. Name of Operators: ALUMAX COATED PRODUCTS INC.

E. Facility Contact (Provide the name, title & phone number of a designated person to contact if additional information is necessary) : R.Shyver - General Manager
(501) 572-5074

F. Number of Employees 42 G. Number of Shifts 2-3

H. Number of Months per Calendar Year which Plant normally operates 12

I. Publicly Owned Treatment Works (POTW) (Provide the name of the sewerage authority, municipality, etc. that receives the wastewater discharges from this facility--If this facility is not connected to a sewerage system describe where wastewater is discharged) Helena

J. Provide the date the facility began/will begin discharging to the POTW (sewerage authority, municipality, etc.) 9/1/95

Date facility began operation 9/1/95

ARP001044

ALUMAX
COATED PRODUCTS, INC.

P.O. Box 2542
215 Phillips 324 Road
West Helena, Arkansas 72390
501/572-5074
FAX 501/572-5594

NPDES Pretreatment Engineer
Arkansas Department of Pollution Control and Ecology
8001 National Drive, P.O. Box 8913
Little Rock, AR 72219-8913

RE: Baseline Monitoring Report

Dear Mr. Torrence:

In accordance with the provisions of 40CFR403.12(d) Alumax Coated Products is hereby submitting our Baseline Monitoring Report for our Helena, Arkansas coil coating line which began production September 1, 1995.

There are a few issues to which we would like to bring your attention. Firstly, the plant is currently in a "ramp up" mode, and we do not expect to be up to full production capacity until about April of 1996. We have therefore completed the BMR showing production and wastewater flows for the past two months, and a projection of production and flows at full production.

Our compliance sampling point contains only treated wastewaters subject to the effluent limitations (and calculated equivalent limits) of 40CFR465. A new flow schematic and diagram have been provided to replace the one submitted with our initial 12/14/94 BMR.

As indicated by the four compliance samples we collected during November, the wastewater treatment plant is performing well and we are in compliance with the equivalent limits. We are, however, noticing relatively high zinc and copper in the incoming city water. Zinc levels in the city water range from 0.35 mg/l to 0.68 mg/l. Copper ranged from 0.22 to 0.87. Should this incoming metal begin to present problems for us in meeting the equivalent limits, we will notify you, and possibly petition for credits under 40CFR403.15.

Finally, as discussed in previous correspondence from Mr. Chuck Kucera of our corporate environmental office, our production as well as mix of aluminum vs. galvanized product will vary from week to week depending on orders. We, of course, keep accurate records on that and will provide that information in our first Semi-annual Report which is due in February 1996.

Very truly yours,

Robert B Shyver

R. Shyver, Branch General Manager Mr. Rufus J. Torrence, Jr.

(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	Exp. Date
Air: Permit to Construct	1581-A	ADPCE 1/5/95	None

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

A. List Raw Material/Basis Metals Used: Aluminum coil, galvanized steel coil, caustic cleaner, chromic acid-based sheet prep., paint, solvents

B. List Toxic Organics (TTO) & alloy metals and their source (Name of Chemical/Basis Metal):
No TTOs to Wastewater

Metals: Chrome, Zinc from sheet

C. Describe Manufacturing or Service Activities Conducted and the Final Products: Cleaning and painting of aluminum and galvanized steel coil sheet.

D. Summarize each Regulated Point Source Category:

Coil Coating Regulated Category	Cleaning and painting of aluminum and galvanized steel coil sheet.
 Regulated Category	
 Regulated Category	

3.D (Con'd) Summarize each Regulated Category:

Process Description*	Year of 1995 Production Rate (Qty/Year) (1)	1995 Prod. Days	Pretreatment Standard Category	Subpart	SIC Code
Coil Coating (Sept.)	7,350,104 ft^2	20	Aluminum	465.35	3479
(Oct.)	9,569,640 ft^2	20	Aluminum	"	"
	16,919,744		All Aluminum		
See Note (2)					

*Process Description must be exactly as shown in the applicable 40CFR SubPart; for example, 40CFR467.35 SubPart C lists "Core", "Extrusion Press Leakage", etc. Production data is not required for concentration based standards [40CFR433, etc].

(1) Production normalizing parameter for coil coating is ft^2.

(2) Plant is in a startup mode. Production will increase over several months. Anticipated full production (May 1996) is:
Aluminum: 20,000,000 ft^2/month -- 15 days/month ①
Galvanized: 15,000,000 ft^2/month -- 7 days/month

E. Provide on a separate sheet(s): (attached)

(i) A schematic drawing/chart of manufactured parts flow through each regulated process that generates wastewater--optional for users with only concentration-based standards.

(ii) A schematic drawing showing all wastewater flows (regulated and unregulated), location of any treatment system, and sampling locations and flows for each individual wastestream. Show points of discharge to the POTW from regulated processes (blank schematic enclosed).

① $\left(20{,}000{,}000\ ft^2/mo\right)\left(\frac{12\ mo}{yr}\right)\left(\frac{1\ yr}{260}\right) = 923{,}077\ ft^2/day$

$\left(20{,}000{,}000\ \frac{ft^2}{mo}\right)\left(\frac{12\ mo}{yr}\right)\left(\frac{15}{22}\right) = 163{,}636$

$\left(15{,}000{,}000\ \frac{ft^2}{mo}\right)\left(\frac{12\ mo}{yr}\right)\left(\frac{7}{22}\right) = 57{,}273$

$220{,}909\ ft^2/year$ total

(4) User Flow Measurement [§403.12(b)(4)]:

A. Total Plant Flow in Gallons per Day (gpd) discharged to POTW:

Current: Average 2700 Maximum 7000

Future: Average 7000 Maximum 11,000

B. Individual Process Flows in Gallons per Day[1] (gpd)

Regulated[2] Streams	Average Flow Rate (gpd)	Max. Flow Rate (gpd)	Type Discharge[3]
40 CFR 465.25	1200	2000	16 hr/day 5 day/wk
	(2000)	(4000)	16 hr/day 5 day/wk
40 CFR 465.35	1200	2000	24 hr/day 6 day/wk
	(2000)	(4000)	24 hr/day 6 day/wk
Unregulated Streams			
Dilute Streams			
Non-Contact Cooling Water	1000	1000	Continuous
Sanitary Wastewater	2000	2000	Continuous

NOTE: Numbers not in parentheses are current flows as of date of this report.
Numbers in parentheses are flows anticipated at full production (4/96).

[1] Referring to 40CFR403.6(e)(1) average flows must be for a 30-day period. Batch discharges which are less frequent than monthly should be normalized to a 365-day period.

[2] Regulated processes have wastestreams regulated by federal standards.
Unregulated processes have wastestreams (which are not regulated by federal standards) with federally regulated parameters.
Nonregulated processes have unregulated and/or dilute wastestreams.
Dilute wastestreams include non-contact cooling water, sanitary waste, etc.

[3] Show type; for example--Continuous, Batch (Monthly, Semi-annually, etc), Intermittent (5 days/week, 25 days/30-day period, etc.)

(5) Measurement of Pollutants in User's Discharge to POTW [§§403.6(a)(2)(ii) & 403.12(b)(5)]:

A. (i) Cite Evidence Why a Particular Subpart is Applicable to each Regulated Category[4]:

Regulated Category	
	N/A Alumax has complied with §403.6(a)(2)(ii) in the 11-18-94 submittal
Regulated Category	
Regulated Category	

(ii) Provide a description of any and all wastewater treatment utilized (show treatment system location in relation to process flows and sampling points on schematic drawing required in Section 3.E above).

B. Mass of Regulated Pollutants Discharged to the POTW: The industrial user must determined the quantities of pollutants discharged to the sewer. These quantities may be instantaneous rates (lbs/day) determined by a discrete analysis of the effluent and measurement of flow for all regulated processes which discharge to the POTW. Provide the rates in the appropriate space below.

RATES ~~(pounds/day)~~ GRAMS/DAY									
Basis	Pollutant								
	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO	O&G
Maximum	*	1.5	2.4	*	*	*	4.14	.07	*	*
Average	*	0.8	1.6	*	*	*	3.9	.05	*	*

Only those pollutants specifically regulated by the applicable category(ies) need be reported.

C. Analysis of Regulated Flows: The industrial user must perform sampling and analysis of the effluent from all regulated processes which discharge into the POTW (after treatment, if applicable). Provide the analytical data for the regulated processes in the appropriate space below.

CONCENTRATIONS (mg/l)										
Basis[5]	Pollutant									
	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN(1)	TTO	O&G
MEC	*	0.44	0.63	*	*	*	1.19	0.24	*	*
AEC	*	0.18	0.30	*	*	*	0.49	0.10	*	*
AMMC (Max.)	*	0.15	0.13	*	*	*	0.46	0.006	*	*
AMAC (Avg.)	*	0.07	0.16	*	*	*	0.34	0.004	*	*

Only those pollutants specifically regulated by the applicable category(ies) need be reported.

NOTE: (1) Alumax certifies that Cyanide is not used in the production process

[4] §403.6(a)(2)(ii)–Optional for Existing Sources and for New Sources which have requested certification.

[5] MEC — Maximum Equivalent Concentration as determined by PC&E
AEC — Average Equivalent Concentration as determined by PC&E
AMMC — Actual Measured Maximum Concentration from Lab results
AMAC — Actual Measured Average Concentration from Lab results

D. User Sample Location: Wier after clarifier (see schemanic)

Sample Type (Composite samples are required except where not feasible or where grab samples are specifically required--refer to 40CFR403.12(b)(5)(iii): GRAB

Number of Samples Taken: 4 Frequency (Daily, Weekly, etc) Will collect one compliance sample per month

Analytical Methods Used (Must be in accordance with 40CFR136–for example: EPA 608, 625, etc.)
CR-1560 CU-1700 CN-1750 ZN-3850 (DR 4000 spectrophotometer)

(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 X NO ___

B. If no, do you require: See cover letter with this BMR on issue of Zinc.

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

(ii) New or additional pretreatment facilities to achieve compliance? YES ___ NO X

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.C above is representative of the User's normal work cycles and the expected Discharges to the POTW.

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

Name & Title DENNIS SULLIVAN, Safety & Env. Manager
Qualified Professional (Please Type or Print)

Signature Dennis Sullivan

Date 11/27/95

(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. In accordance with **§403.12(b)(7)** as of November 10, 1990 all categorical industries were required to be in compliance. New sources must not commence discharge until compliance is possible.

B. Signatory Requirement **[40 CFR 403.12(l)]**

40 CFR 403.12(l)(3) Authorization to Sign Environmental Reports

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

Mitchell B. Lewis, General Manager
Corporate official name & title here

M. Lewis
Signature

5/24/95
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.

Robert Shyver
Name of Authorized Representative (Please Type or Print)

Branch General Manager
Official Title (Please Type or Print)

Robert B. Shyver
Signature

11/27/95
Date

Voided 12-14-95

Amerimax

Amerimax Coated Products, Inc.
215 Phillips, 324 Road
Helena, Arkansas 72342
870/572-5074
870/572-5594 FAX

40 CFR 403.12(1)(3) Authorization to Sign Environmental Reports

I hereby authorize the person(s) filling the position of Environmental & Safety Manager, responsible for the overall environmental matters for the Amerimax facility in Helena, 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(1) and comparable state regulations.

Scott Anderson, President, Amerimax Building Products
Corporate Official Name & Title here

_____ - President
Signature

4/27/01
Date

PDF 3-15-06

Pretreatment Industrial Inspection

Facility Information

Facility Name: Amerimax Coated Products, Inc.	Site Address: 215 Phillips 324 Road Helena, AR 72342
Signatory Authority (Name & Title): Heath Albers, Plant Manager	
Phone: (870) 572-5074	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, GA 30092
Fax:	Phone: (770) 449-7066
Contact Person (Name & Title): Same	Fax: (770) 449-7354
	Corporate CEO: Dave Smith
e-mail: HAlbers@amerimaxbp	e-mail: dsmith@euramax.com
Facility Permit # or ARP00 1044	**Last Inspection Date:** N/A
POTW (City) IU discharges to: Helena WWTP	POTW's NPDES #AR00 43389
Industrial Classification: ☒ Categorical	☐ Significant
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 465	

Table of Contents

Comments :

Inspector's Name (Print): Rufus Torrence	Signature:
IU Rep's Name (Print) Heath Albers, Plant Manager	Signature:
Date and Time Inspection Ended: 4-27-05 @ 11:15 am	

I. Summary of Inspection

A. Inspection and Objective (Complete Before Inspection)

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

Inspection Objective(s)

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: 4-27-05 @ 10:00	SIC code(s): 3479
IU Reps/Titles: Heath Albers, Plant Mgr.	Control Authority Reps/Titles: Rufus Torrence, Pret Eng
End product(s): Coated Aluminum & Galv Coils	Approx. # of units produced: 200mm ft²
Days of Operation: M-F	Days of Production (if different):
Hours of Operation: 24/day	Hours of Production (if different):
Shift 1, hrs.: 7 to 3 pm / Shift 2, hrs.: 3pm to 11 pm / Shift 3, hrs.: 11 pm to 7 AM	
# of Employees: 75 / Peak Mos.: May to Sep / "Off" Mos.: Nov & Dec	

Are there any scheduled plant shutdowns? Yes ☒ No ☐ N/A ☐ If yes, when? 2 wks 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** ☐

If **No**, explain:

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 & mobile equipment in operation

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:

Production Levels? Yes ☐ No ☐ If yes, explain:

Raw materials? Yes ☐ No ☐ If yes, explain:

Flow rates? Yes ☐ No ☐ If yes, explain

Are regulated and non-regulated wastestreams combined?	yes ☐	no ☒	
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?

*Al/ym = 700,000 sq/day Steel = 59,000 sq ft/day

Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? yes ☐ no ☐ N/A

* See Attment A-2

B. Facility Permits		
Permit Type	Permit No.	Expiration Date
Air	1581-AR-1	N/A
RCRA		
NPDES	ARR00B965	
Other		

C. Additional Comments
(Note which section or attachment comments are regarding)

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, the coating is cured and the coils are rewound.

General observations of facility's indoor housekeeping: Excellent

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 20,880 gpd	☐ Equip. Cleanup	☐ Floor Cleanup	☒ Spent Bath Solutions 3914 gal per six months
☐ Product Cleaning	☐ Forklifts Maint./Wash	☐ Tank Dragout	☐ Air Pollution Devices
☒ Boiler Blowdown Does not go to treatment system	☐ 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) Cr, Cu & Zn	☐ 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:

Continuous floor drain around coating line. Only receives flow from coating line. No other sources use floor drains

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:

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):

IN GOOD WORKING ORDER; METER CALIBRATED ON 3-18-05

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

System Operator(s) Name:

Eddie Little, Wet Section Opr

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:

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: 3000 gallons per batch

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

Approximate duration of batch discharge: 3 hours

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
22½° V-Notch Weir w/ ISCO flow measur	Factory representative Once per year	Instantaneous and totalized flow/Electronic data acquisition & recording

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	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer Pumped to drums & hauled off-site
2. Waste Storage Room	☒ Yes ☐ No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer " " " "
3. Hazardous waste storage	☒ Yes ☐ No	☐ 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:

Chemical handling procedures (totes, dolly, buckets, hardline, etc):

Attachment E: Spill/Slug Control Plan	
Does the facility have a Spill/Slug control plan?	☒ yes ☐ no
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 — Sample Box at weir discharge
Total Flow Monitoring Point — V-Notch Weir
Upstream Manhole
Point of Connection:

* For Surface Spills only; no Spills can accidentally enter POTW.

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 discharge by American Interplex Corporation

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 ☐	
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/yr	☐ Cr(t) 2/yr	☐ Ni(t)	☐ Pb(t)
☐ Ag(t)	☐ Zn(t) 2/yr	☐ pH	☐ CN^-(t) 2/yr	☐ 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.)

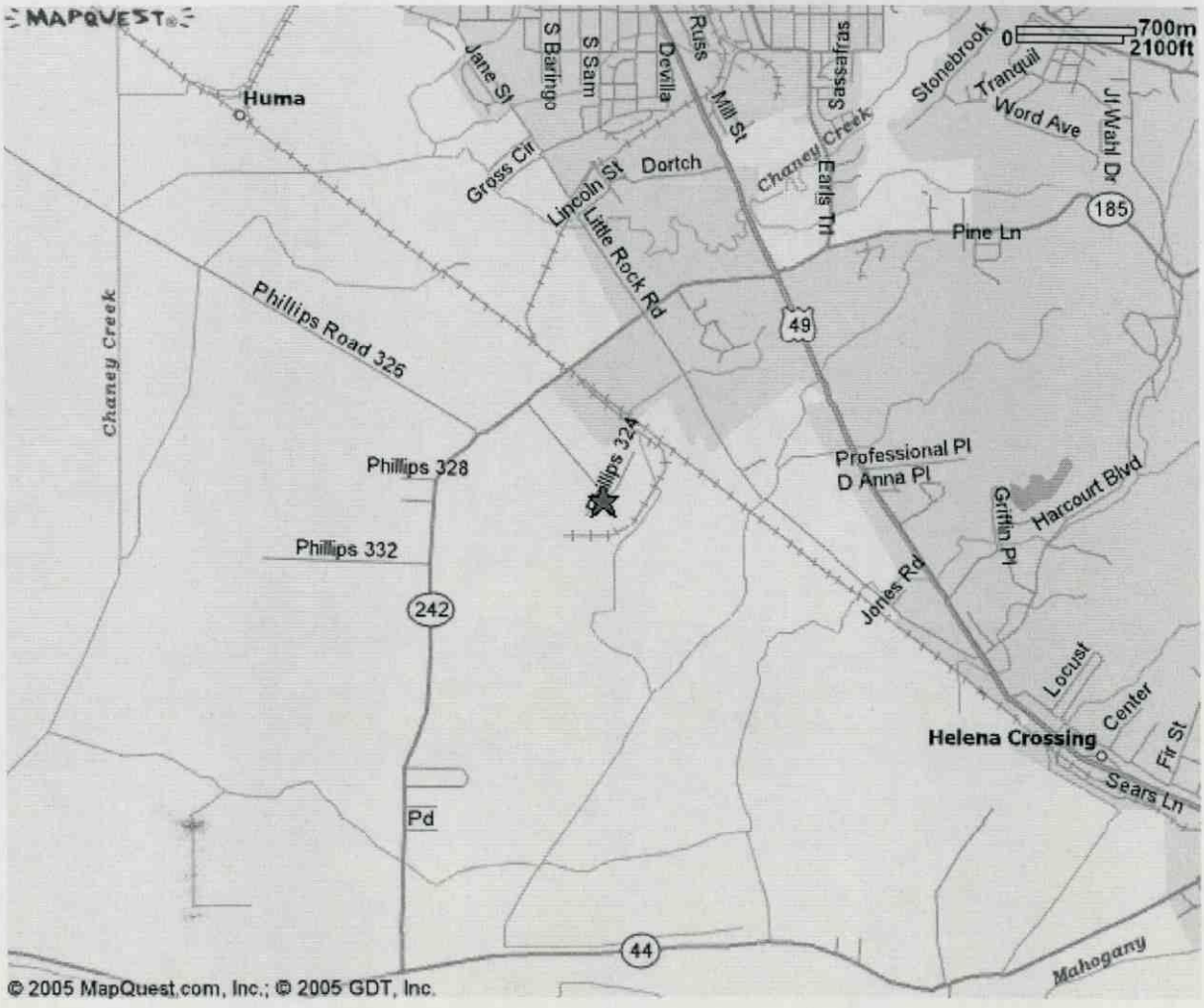
Comments:

MAPQUEST.

Send To Printer Back to Map

215 Phillips 324
Helena AR
72342-8710 US

Notes:



1-31-95 Rufus

STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY
8001 NATIONAL DRIVE, P.O. BOX 8913
LITTLE ROCK, ARKANSAS 72219-8913
PHONE: (501) 562-7444
FAX: (501) 562-4632

CERTIFIED MAIL, RETURN RECEIPT REQUESTED (P 231 874 816)

PDF 3-15-06

January 30, 1995

Mr. Chuck Kucera, Cor Dir of Env Affairs
Alumax Coated Products, Inc
5655 Peachtree Pkwy
Norcross, GA 30092-2812

Re: State Pretreatment Reporting Requirements[1]

Dear Mr. ~~Watson~~ Kucera:

In accordance with §403.6(a)(5) Alumax has declined to contest the West Helena facility as a 40CFR465 Coil Coater, Categorical Industrial User. In accordance with §403.12(b), industrial users with processes regulated by categorical standards (40CFR465, et al) must submit an acceptable Baseline Monitoring Report (BMR) to the Control Authority (PC&E). The BMR signed by Charles Kucera and dated November 18, 1994 is acceptable for determining compliance with §403.12(b); nonetheless, pursuant to **40CFR403.12(d)** Alumax must submit a final BMR to PC&E within ninety days following commencement of the introduction of regulated wastewater into the City of Helena Publicly Owned Treatment Works (POTW).

CATEGORICAL DETERMINATION **[§403.6(a)]**

In reference to BMR dated 11-18-94, PC&E and Region VI certified one "point source" containing two regulated wastewater streams.

1. Coil Coating:

   a. **Galvanized Basis Material Stream [40CFR465.25]**

   b. **Aluminum Basis Material Stream [40CFR465.35]**

   c. **Painting of Galv & Alum Material Stream [40CFR465.25 & .35]**--The schematic dated 12-14-94 (copy enclosed) indicated that this stream was "unregulated". PC&E has determined that the wastewater from this operation falls under coil coating; §465.02(b) states that *"painting are performed on the basis material"*. Because coil coating includes not only conversion coating but also cleaning and painting, this is actually not a third stream but integral part of the galv and alum coating process streams.

[1] In accordance with §4.a.11 (Incorporation of Federal Regulations) of Regulation No. 6 of the Arkansas Water and Air Poll Act (Act 472 of 1949, as amended; Ark. Code Ann. 8-4-101 et. seq.), the State of Arkansas has adopted *"line for line and word for word. through 471 inclusive (Subchapter N)"*.

2. Unregulated Streams:

   [40CFR403.6(e)]--Unless approved by PC&E, Alumax shall have no §403.6(e) unregulated streams passing through the sampling point [Alumax did not declare a sampling location; the sampling point must include all and only regulated wastewater unless Alumax petitions PC&E to include other wastestreams. The "final holding tank" is an acceptable sampling location].

3. Dilute Streams:

   [40CFR403.6(e)]--Unless approved by PC&E, Alumax shall have no dilute streams passing through the sampling point.

In accordance with §403.6(a)(5), Alumax may contest this determination within 30 days following the date of receipt of this letter.

BMR REVIEW **[§403.12(b)]**

In accordance with §403.12(b), Alumax was required to submit a Baseline Monitoring Report (BMR) to PC&E before commencing regulated discharge to the local POTW; PC&E received this BMR on 11-23-94 and declared it acceptable. Within ninety (90) days after commencement of introduction of wastewater into the POTW Alumax is required to submit a "final" BMR. The information in the "preliminary" (11-18-94) BMR may be acceptable for the final BMR [Indicated by "Ditto"]:

1. Section 1&2--ditto

2. Section 3.B--ditto

3. Section 3.D--ditto

4. Section 3.E in the BMR requires schematic drawings. The schematic submitted (12-14-94 drawing) indicated an "unregulated" stream. Using the enclosed blank schematic, please correct the schematic and attach the original to the new BMR. All drawings should be completed and stamped by a State registered professional engineer and/or signed by Charles J. Kucera.

5. Section 4. Flow Measurement--Section 4 in the 11-18-94 BMR listed no unregulated process. Please note the definition of an unregulated stream[2]. ALX must have an appropriate flow measurement device installed to measure the regulated stream[3].

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[2] Regulated processes have wastestreams regulated by federal standards.
Unregulated processes have wastestreams (which are not regulated by federal standards) with federally regulated parameters.
Nonregulated processes have unregulated and/or dilute wastestreams.
Dilute wastestreams include non-contact cooling water, sanitary waste, etc.

[3] Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be selected and used to insure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated and maintained to insure the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than ±10% from true discharge rates throughout the range of expected discharge volumes and shall be installed at the monitoring point of the discharge.

6. Section 5.B in the final BMR must be completed. PC&E will not enforce mass rates at this time but reserves the right to enforce mass rates at a later date.

7. Section 5.C in the final BMR must be completed. ALX equivalent limits (MEC & AEC) are listed in the enclosed Basis for Monitoring[4]. These limits must be shown in Section 5.C; showing the limits indicates that ALX has reviewed the limits and agrees with them.

   a. Please record the results in the final BMR as provided by the lab[5]. Zero concentrations are not acceptable; list the detection limit if the parameter was below the detection limit.

   b. ALX must test for Cr, Cu, Zn and Cyanide.

   c. ALX must comply with the general and specific limits in **§403.5** (wastewater may not have: a flashpoint >140° F; pH <5.0; heat causing POTW influent to exceed 104° F; et.al.)

   d. The sampling location is critical; if ALX has any doubts about the correct location, please contact PC&E[6].

   e. **§403.6(d)** prohibits dilution "*as a partial or complete substitute for adequate treatment to achieve compliance with a Pretreatment Standard*".

8. Please complete Section 5.C for each sampling location.

9. Section 6 in the BMR must contain certification that ALX is/is not meeting applicable categorical pretreatment standards on a consistent basis.

   a. The analyses and schematics submitted must be sufficient to verify the certification.

   b. **Please note that ALX must not commence discharging from the regulated processes until the facility is capable of meeting pretreatment standards within 90 days on a consistent basis; refer to §403.6(b) for more details.**

---

[4] In reference to Chuck Kucera letter dated 12-14-94, PC&E will not require Alumax to obtain an ADPC&E permit at this time. Present engineering calculations indicate that the Helena POTW is in no immediate threat from toxic pollutants. If the POTW headworks loading increases or Alumax causes problems at the POTW, an ADPC&E or local permit (or both) may be required. Furthermore, the **highly variable** mode will not affect the equivalent limits since (1) PC&E will use the Long Term Average for production rates and flows, (2) PC&E present policy allows for a 50% change before new limits are considered [low headworks loading of pollutants allow a larger tolerance than the usually 20%], (3) categorical standards were developed to allow for variability [Per EPA Guidance Manual for the Use of Production-Based Pretreatment Standards and the Combined Wastestream Formula, "*Categorical standards are developed in such a way that they are expected to be achievable in spite of normal variation in day-to-day production rates and the effect that routine variation has on effluent quality.*" and, finally, (4) Alumax will not be required to comply with the promulgated standards which require concurrent monitoring of production rates and flows [in accordance with §403.6(c)(5) Alumax must comply with the equivalent limits only].

[5] An adequate analytical quality control program, including the analysis of sufficient standards, spikes, and duplicate samples to insure the accuracy of all required analytical results shall be maintained by the user or designated commercial laboratory. At a minimum, spikes and duplicates samples are to be analyzed on 10% of the samples. Only reports from laboratory certified by ADPC&E will be accepted without verification of QC/QA; if any industry or business has doubts, please contact Richard Thompson at (501)570-2196.

[6] Each user has the final responsibility for sampling at the correct location.

c. This section should be stamped with the seal of a State qualified professional and/or signed by Charles Kucera.

10. Section 7.B should be signed by the Plant Manager or Charles Kucera; refer to **§403.12(l)** for restrictions. The plant manager at a facility with less than 250 employees must get authorization to sign environmental reports.

11. All analyses must have the following:

a. Chain of custody forms must be submitted with the BMR which indicates the time, date and place of sampling. The forms must also indicate the type of samples (composite or grab) and kind of preservation employed; preservation techniques must conform with **§136**. Please attach these forms to the final BMR.

b. The lab analyses must show that **§136** methods were employed and must show the concentration and method for each parameter.

c. ALX must certify "*that such sampling and analysis is representative of normal work cycles and expected pollutant Discharges to the POTW*". Refer to section 6 in the BMR form.

ALX must submit the entire BMR (MSDS previously submitted do not have to be resubmitted nor other redundant or extraneous information) with the required attachments.

ALX may elect to use the final BMR as the August 1995 semi-annual report if the final BMR is received by PC&E within 60 days of (and before) August 31, 1995.

SEMI-ANNUAL REPORTS **[§403.12(e)]**

ALX is required to submit semi-annual reports which are due in **February** and **August** of every year to demonstrate continued compliance with pretreatment standards per §§465.25&35.

1. ALX may voluntarily comply with O&G limits of 15 (Max) and 10 (Ave) mg/l. This voluntary compliance will help insure that no toxic organics are discharged to the POTW.

2. ALX must sample for Cyanide[7], Chromium, Copper and Zinc for every semi-annual report submitted to PC&E; please be sure methods are indicated on lab reports.

ALX MUST TEST FOR CYANIDE FOR THE FINAL BMR.

[7]Only one analysis for cyanide is required each calendar year; see §465.03(a). The first wastewater sample must contain less than 0.07 mg/l of cyanide before ALX may submit a certification for the second semi-annual report.

3. Pursuant to **§403.12(e)(1)** in each semi-annual report ALX must "*include a record of measured or estimated average and maximum daily flows for the reporting period for the Discharge reported in*" the "final" BMR (Section 4).

4. The first semi-annual report is due by August 31, 1995 if the final BMR has been submitted. ALX may submit the final BMR with all the required analyses (CN, Cr, Cu & Zn) and attachments (as shown in the BMR REVIEW above) in lieu of the first semi-annual report (60 day limit required). **Please note that failure of PC&E to either review or approve the final BMR does not relieve ALX of the responsibility to submit all required future semi-annual reports.**

5. Enclosed is a blank Semi-Annual Report (and a completed example) form which ALX may use to submit future reports. Please note that EPA does not require ALX to use this form; nonetheless, ALX should use this form. It may be entered into a word processor; please follow the format as close as possible.

RCRA REQUIREMENT **[§261 & §403.12 (p)]**

As part of PC&E responsibilities in implementing the National Pretreatment Regulations, NPDES Pretreatment is required to notify all Categorical Industries of their obligations under Subtitle C and D of RCRA and the Arkansas Hazardous Waste Management Code. These regulations apply not only to waste that is discharged but also to waste that is hauled or stored. PC&E (Hazardous Waste) may require reporting. For more information contact Vicky Prewett [(501) 570-2867] at the address above.

In accordance with **§403.12(p)** ALX "*shall notify the POTW* [Helena Water & Sewer Department], *the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under* ***40 CFR part 261***."

To satisfy part (ALX may discharge hazardous waste which is not regulated by §465) of the requirement of **§403.12(p)(1)** for notifying the POTW and to implement the intent of **§403.12(b) & (e)**, please send a copy of the BMR (with analyses) and each semi-annual report (and other correspondence to NPDES Pretreatment) to Dennis Sullivan, General Manager of Helena Water and Sewer Department.

The information above is guidance only; ALX has the final responsibility under the law for submitting a complete report. The elements showed above include but are not necessarily all the requirements for a complete report.

If Alumax or an authorized representative has questions or needs more information, please contact PC&E NPDES Pretreatment at 562-7444 (ext. 234).

Sincerely,

Rufus J. Torrence, Jr.
PC&E NPDES Pretreatment Engineer

Enclosures:
(1) Blank BMR form [BMR-FORM-PROD_BASED.wpc Rev 11-29-94]
(2) Blank Schematic [ALX-DIAGRAM2.wpc]
(3) ALX Schematic dated 12-14-94
(4) ALX-BFM-PB_CIU.wpc (rev 1-25-95)
(5) Example Semi-Annual report (SAR)
(6) Blank SAR form [CIU-SAR_FORM465.wpc 12-22-95]

cc: Lee Bohme, US EPA Region VI (6W-PM)

Dennis Sullivan
702 Cherry St

Helena WWTP
Helena, AR 72342

Central Files (AR0043389)

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: Heath Albers **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: August 2006 **TO:** February 2007

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

40 CFR Part 465 -- Coil Coating Point Source Category

PROCESS*	PROD'N RATE(S) Total for Six Months	PROD'N DAYS Number of Operating Days
Subpart A Steel	N/P	
Subpart B Galv	① 7,342,999 sq ft ②	5.42 #2
Subpart C Alum	① 66,937,385 Sq ft ②	49.41 #3
Subpart D Canmak	N/P	

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

① Only one production line in plant; it runs both galv & alum coils.
② Rates must be entered into ANPCAN in sq. ft.
10.76 sq. ft./m^2
3.785 liters/gallon

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.

Feb 2007 SAR
Filedate 20070314

7832
RECEIVED
MAR 9 2007
MR

C. Number of Regular Employees at this Facility 60

D. [Reserved] ARPOW1044

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REQUIRED BY 40 CFR 403

(1) IDENTIFYING INFORMATION

A. CERTIFICATE & MAILING ADDRESS

B. FACILITY & LOCATION ADDRESS

C. FACILITY CONTACT

TELEPHONE NUMBER

(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

FROM: TO:

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

40 CFR Part 413 -- Coil Coating Point Source Category

PROCESS	PRODUCTION RATE (Total for 365 Weeks)	PRODUCTION DAYS (Number of Operating Days)
Subpart A Steel		
Subpart B Galv		
Subpart C Alum		
Subpart D Canmak		

Show Note 2, Step 1 If process is not present, show "Not Present" or "NP"

B. CHANGES

C. Number Of Regular Employees at This Facility

D. (Reserved)

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

(4) FLOW MEASUREMENT (CON'D)

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

Operation	Ave Tot Flow[1]	Max Tot Flow[2]	Type of Discharge	No. Disc Days	
Regulated: Steel Basis					
Regulated: Galv Basis	3,051	4,273		5.42	#2
Regulated: Alum Basis	27,813	38,947		49.41	#3
Regulated: Canmaking					
Total Regulated ANPCAN	30,864	43,220			
§403.6(e) Unregulated[3]					
§403.6(e) Dilute					
Cooling Water					
Sanitary	1,425	1,425	continuous	54.83	
Total Flow to POTW			**********	**********	

[1] "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.
[2] "Max Tot Flow" is the maximum "total gallons discharged in a 24-hour day" during the reporting period.
[3] "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 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 ①	Cu	Pb	Ni	Ag	Zn	O&G	CN*	Phen	TTO*
MEC (mg/l)		0.22 Alum 1.42 Galv	4.80 Galv				0.59 Alum 3.82 Galv		0.11 Alum 0.76 Galv		
AEC (mg/l)		0.09 Alum 0.57 Galv	2.29 Galv				0.24 Alum 1.64 Galv		0.05 Alum 0.31 Galv		
AMMC (mg/l)		0.007 Alum 0.007 Galv	0.006 Galv				0.19 Alum 0.19 Galv		0.01 Alum 0.01 Galv		
AMAC (mg/l)		0.007 Alum 0.007 Galv	0.006 Galv				0.19 Alum 0.19 Galv		0.01 Alum 0.01 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) COMPOSITE

Number of Samples and Frequency Collected 2 - SEMIANNUALLY

40CFR136 Preservation and Analytical Methods Use: ✠ Yes ☐ No

① Used Alum for data entry into ANPCAN (Amx form)

40 CFR 63.9(h) SEMI-ANNUAL REPORT CONT'D FACILITY NAME: _____

(4) CEMS SPECIFICATIONS (CONT'D)

B. CONDITIONS AT WHICH CEMS DO NOT CONFORM TO PERFORMANCE SPECIFICATIONS (cont'd)

Operation	Ave. Tot Flow	Max Tot Flow	Type of Discharge	No. Disc Days
Regulated: Steel Basin				
Regulated: Clyo Basin				
Regulated: Alloy Basin				
Regulated: Quenching				
Total Regulated				
§63.6(e) Unregulated[2]				
§63.6(e) Outlets				
Cooling Water				
Sanitary				
Total Flow to POTW				

[1] "Ave Tot Flow" is the average of "total gallons discharged in a 24-hour day" during the reporting period. Note that "Ave Tot Flow" does "Not Disc Days" must equal the [illegible] gallons discharged to the POTW for this discharge type.

[2] "Max Tot Flow" is the maximum "total gallons discharged in a 24-hour day" during the reporting period.

[3] "Unregulated" here pertains to §63.6(e).

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM
CHECK EACH APPROPRIATE BLOCK
☐ Neutralization
☒ Chemical Precipitation and Sedimentation
☐ Chromium Reduction
☐ Cyanide Destruction
☒ Other [illegible]
☐ None

B. CONDITIONS OF TREATMENT SYSTEM

C. THE FOLLOWING TABLE REFLECTS SAMPLING AND ANALYSIS OF BOTH EFFLUENT FROM ALL REGULATED PROCESSES AND INTAKE WATER (IF USED). ATTACH THE LAB ANALYSIS WHICH SHOWS MAXIMUM TAKE LAB ALL SAMPLES MEASURED DURING THE REPORTING PERIOD IN THE SERVICE PROVIDED IN THE SERVICE PROVIDED. ALSO CONFIRM THAT NOT CERTIFIED/LIST PRIOR TO CONCENTRATIONS WERE BELOW DETECTION LIMIT.

Pollutant	Cd	Cr	Cu	Pb	Ni	Ag	Zn	O&G	CN	Phen	TTO
MEC (mg/l)											
AEC (mg/l)											
AMMC (mg/l)											
AMAC (mg/l)											

Provide Core for Volatiles (open). Re-certification may be submitted for the Organic report if it is applicable.

Sample Location _____

Sample Type (Grab or Composite) _____

Number of Samples and Frequency Collected _____

40 CFR 136 Preservation and Analytical Method Used: ☒ Yes ☐ No

(6) CERTIFICATION

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

Heath Albers
(Typed Name)

C. Heath Albers 3/6/07
(Corporate Officer or authorized representative signature)

Date of Signature _____

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 _____.

[RESERVED]

(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.

Heath Albers
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

C. Heath Albers
SIGNATURE

Plant Manager
OFFICIAL TITLE

3/6/07
DATE SIGNED

AMX_Production_Based_Standards.xls

AMERIMAX COATED PRODUCTS
WEST HELENA, AR
Report Date: August 2006 thru February 2007

	Data Entry Col		
Galvanized Line			
Prod'n Rate (Total Sq Footage for 6 months) . .	**7,342,999**	1,354,797	sqft/day
Prod'n Days	**5.42**		
Maximum Flow (gpd)	4,273	16,171	liters/day
Average Flow (gpd).	3,051	11,548	liters/day
Aluminum Line			
Prod'n Rate (Total Sq Footage for 6 months) . .	**66,937,385**	1,354,734	sqft/day
Prod'n Days	**49.4**		
Maximum Flow (gpd).	38,947	147,416	liters/day
Average Flow (gpd).	27,813	105,272	liters/day

	Cr	CN	Zn	Cu
Daily Maximum Aluminum				
465.35 Regulatory Allowance (mg/sqmeter)	0.18	0.095	0.49	
Plant Allowable (mg)	22662.8	11960.9	61693.3	
Plant Allowable (mg/liter)	**0.22**	**0.11**	**0.59**	
Measured (mg/l)	**<0.007**	**<0.01**	**0.19**	
Monthly Average Aluminum				
465.35 Regulatory Allowance (mg/sqmeter)	0.072	0.038	0.20	
Plant Allowable (mg)	9065.1	4784.4	25180.9	
Plant Allowable (mg/liter)	**0.09**	**0.05**	**0.24**	
Measured (mg/l)	<0.007	<0.01	0.19	
Daily Maximum Galvanized Steel				
465.25 Regulatory Allowance (mg/sqmeter)	0.13	0.07	0.35	0.44
Plant Allowable (mg)	16368.4	8813.7	44068.7	55400.6
Plant Allowable (mg/liter)	**1.42**	**0.76**	**3.82**	**4.80**
Measured (mg/l)	**<0.007**	**<0.01**	**0.19**	**<0.006**
Monthly Average Galvanized Steel				
465.25 Regulatory Allowance (mg/sqmeter)	0.052	0.028	0.15	0.21
Plant Allowable (mg)	6547.3	3525.5	18886.6	26441.2
Plant Allowable (mg/liter)	**0.57**	**0.31**	**1.64**	**2.29**
Measured (mg/l)	<0.007	<0.01	0.19	<0.006

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 month period for the basis metal of concern.

(1) All limits match ANPCAN limits "exactly".

AMX Production Based Standards.xls

AMSPRIMAX COATED PRODUCTS
WEST NELENA, AK
Report Date: [illegible]

Galvanized Line			
Prod'n Rate (Total Sq Footage for 6 months)		7,342,899	1,224,737 sqft/day
Prod'n Days		5.42	
Maximum Flow (gpd)		4,273	19,171 liters/day
Average Flow (gpd)		3,051	11,549 liters/day
Aluminum Line			
Prod'n Rate (Total Sq Footage for 6 months)		66,927,388	1,394,737 sqft/day
Prod'n Days		48.0	
Maximum Flow (gpd)		38,047	144,416 liters/day
Average Flow (gpd)		27,813	105,272 liters/day

	Cr	Cr6	Zn	Cu
Daily Maximum Aluminum				
465.25 Regulatory Allowance (mg/sqmeter)				
Plant Allowable (mg)	22858.8	1189.9	8109.3	
Plant Allowable (mg/liter)	0.22	0.11	0.59	
Measured (mg/l)	0.00	0.00	0.00	
Monthly Average Aluminum				
465.25 Regulatory Allowance (mg/sqmeter)				
Plant Allowable (mg)	9053.1	471.4	2571.9	
Plant Allowable (mg/liter)	0.09	0.05	0.24	
Measured (mg/l)	0.00	0.00	0.00	

Daily Maximum Galvanized Steel				
465.25 Regulatory Allowance (mg/sqmeter)				
Plant Allowable (mg)	16398.4	6813.7	44098.7	6400.0
Plant Allowable (mg/liter)	1.62	0.76	3.83	4.80
Measured (mg/l)	0.00	0.00	0.00	0.00
Monthly Average Galvanized Steel				
465.25 Regulatory Allowance (mg/sqmeter)				
Plant Allowable (mg)	6547.3	3529.5	16809.6	2644.2
Plant Allowable (mg/liter)	0.57	0.31	1.64	2.29
Measured (mg/l)	0.00	0.00	0.00	0.00

The "Plant Allowable" for Daily & Allum 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 month period for the basis metal of concern.

AMERICAN INTERPLEX CORPORATION
LABORATORIES

8600 Kanis Road
Little Rock, AR 72204-2322
(501) 224-5060
FAX (501) 224-5072

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE OF

Client: Ameriray
Project Reference: Aluminum Process
Project Manager:
Sampled By: Eugene Hopton
PO No.

AIC CONTROL NO: 107550
AIC PROPOSAL NO:
Carrier: AIC
Received on Ice (4°C)? YES / NO

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	SAMPLE MATRIX: WATER	SOIL	NO OF BOTTLES	ANALYSES REQUESTED: (2.T	Cr, Cu, Zn, As, Ni	Remarks
	Effluent	2-22-07 1051	X		X		2	X	X	
		Container Type						P	P	
		Preservative						B	N	

Field pH calibration on ____ @ ____ 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

Turnaround Time Requested: (Please circle)
NORMAL or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: _____
Phone: _____ Fax: _____
Report Attention to: _____
Report Address to:

Relinquished By:	Date/Time	Received By:	Date/Time
Eugene Hopton	2-22-07 1530		
Relinquished By:	Date/Time	Received in Lab By:	Date/Time
		[signature]	2-22-07 1530

Comments: Tech. Time = 4.75 hours Mileage = 250 miles
Sampled Per EPA-600/4-82-029

5/01

FORM 0060

AMERICAN INTERPLEX CORPORATION
LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE 1 OF 1

Client: Amer. mgX
Project Reference: Zinc Process
Project Manager:
Sampled By: Eugene Hopton

PO No.

SAMPLE MATRIX

NO OF BOTTLES

ANALYSES REQUESTED

AIC CONTROL NO: 107693
AIC PROPOSAL NO:
Carrier: AIC
Received Temperature C: 1

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL		NO OF BOTTLES	Cr, Cu, Zn, As, Ni	Cd, T	Remarks
(1)	Effluent	2-28-07 0916	X		X			2	X	X	
		Container Type							P	P	Field pH calibration
		Preservative							N	B	on ____ @ ____ 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

Turnaround Time Requested: (Please circle)
NORMAL or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: _____
Phone: _____ Fax: _____
Report Attention to:
Report Address to:

Relinquished By:	Date/Time	Received By:	Date/Time
Eugene Hopton	2-28-07 1430		
Relinquished By:	Date/Time	Received in Lab By:	Date/Time
		[signature]	28/Feb/07 1430

Comments: Tech. Time = 4.5 Hours ; 250 miles
Sampled Per EPA-600/4-82-029

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: Heath Albers **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: February 2006 TO: August 2006

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

40 CFR Part 465 -- Coil Coating Point Source Category

PROCESS*	PROD'N RATE(S) Total for Six Months	PROD'N DAYS Number of Operating Days
Subpart A Steel	N/P	
Subpart B Galv	① 11,065,446 Sq ft ②	8 #2
Subpart C Alum	① 116,838,349 Sq ft ②	86.1 #3
Subpart D Canmak	N/P	

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

① Only one production line in plant; it runs both galv & alum coils.

② Rates must be entered into ANPCAN in sq.ft. (10.76 Sq.ft/m²)
3.785 liters/gallon

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.

Aug 2006 SAR

Filedate 20060829

C. Number of Regular Employees at this Facility 36

D. [Reserved]

Rec'd 8-29-06

(870) 572-5074 2-28-07
3:45

Called Heath Albers; left
message – Feb 2007 SAH pst due.

(4) FLOW MEASUREMENT (CON'D)

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

Operation	Ave Tot Flow[1]	Max Tot Flow[2]	Type of Discharge	No. Disc Days
Regulated: Steel Basis				
Regulated: Galv Basis	2,741	3,987		8 #2
Regulated: Alum Basis	28,939	42,093		86.1 #3
Regulated: Canmaking				
Total Regulated	31,680*	46,080		
§403.6(e) Unregulated[3]				
§403.6(e) Dilute				
Cooling Water				
Sanitary	1,425	1,425	continuous	94.1
Total Flow to POTW			**********	**********

[1]"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.
[2]"Max Tot Flow" is the maximum "total gallons discharged in a 24-hour day" during the reporting period.
[3]"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 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	① Cu	Pb	Ni	Ag	Zn	O&G	CN*	Phen	TTO*
MEC (mg/l)		0.21 Alum 1.61 Galv	5.45 Galv				0.56 Alum 4.34 Galv		0.11 Alum 0.87 Galv		
AEC (mg/l)		0.08 Alum 0.64 Galv	2.60 Galv				0.23 Alum 1.86 Galv		0.04 Alum 0.35 Galv		
AMMC (mg/l)		0.019 Alum 0.007 Galv	0.009 Galv				0.16 Alum 0.19 Galv		0.01 Alum 0.01 Galv		
AMAC (mg/l)		0.019 Alum 0.007 Galv	0.009 Galv				0.16 Alum 0.19 Galv		0.01 Alum 0.01 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) COMPOSITE

Number of Samples and Frequency Collected 2 - SEMIANNUALLY

40CFR136 Preservation and Analytical Methods Use: ✠ Yes ☐ No

* ANTICAN
① Alum line for dataentry

(6) CERTIFICATION

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

Heath Albers
(Typed Name)

(Corporate Officer or authorized representative signature)

Date of Signature 8/28/06

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.

Heath Albers
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

C. Heath Albers
SIGNATURE

Plant Manager
OFFICIAL TITLE

2/28/06
DATE SIGNED

AMX_Production_Based_Standards.xls

AMERIMAX COATED PRODUCTS
WEST HELENA, AR
Report Date: February, 2006 thru August 2006

	Data Entry Col		
Galvanized Line			
Prod'n Rate (Total Sq Footage for 6 months) . .	**11,065,446**	1,383,181	sqft/day
Prod'n Days	**8**		
Maximum Flow (gpd)	3,987	15,089	liters/day
Average Flow (gpd).	2,741	10,374	liters/day
Aluminum Line			
Prod'n Rate (Total Sq Footage for 6 months) . .	**116,838,349**	1,357,796	sqft/day
Prod'n Days	**86.1**		
Maximum Flow (gpd).	42,093	159,324	liters/day
Average Flow (gpd).	28,939	109,535	liters/day

	Cr	CN	Zn	Cu
Daily Maximum Aluminum				
465.35 Regulatory Allowance (mg/sqmeter)	0.18	0.095	0.49	
Plant Allowable (mg)	22714.1	11988.0	61832.7	
Plant Allowable (mg/liter)	**0.21**	**0.11**	**0.56**	
Measured (mg/l)	**0.019**	**<0.01**	**0.16**	
Monthly Average Aluminum				
465.35 Regulatory Allowance (mg/sqmeter)	0.072	0.038	0.20	
Plant Allowable (mg)	9085.6	4795.2	25237.8	
Plant Allowable (mg/liter)	**0.08**	**0.04**	**0.23**	
Measured (mg/l)	0.019	<0.01	0.16	
Daily Maximum Galvanized Steel				
465.25 Regulatory Allowance (mg/sqmeter)	0.13	0.07	0.35	0.44
Plant Allowable (mg)	16711.3	8998.4	44991.9	56561.3
Plant Allowable (mg/liter)	**1.61**	**0.87**	**4.34**	**5.45**
Measured (mg/l)	**<0.007**	**<0.01**	**0.19**	**0.0085**
Monthly Average Galvanized Steel				
465.25 Regulatory Allowance (mg/sqmeter)	0.052	0.028	0.15	0.21
Plant Allowable (mg)	6684.5	3599.4	19282.3	26995.2
Plant Allowable (mg/liter)	**0.64**	**0.35**	**1.86**	**2.60**
Measured (mg/l)	<0.007	<0.01	0.19	0.0085

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 month period for the basis metal of concern.

(1) Limits match ANPCAN limits "precisely."

AMERICAN INTERPLEX CORPORATION
LABORATORIES

July 28, 2006
Control No. 101788

Amerimax Coated Products, Inc.
ATTN: Mr. Heath Albers
215 Phillips 324 Road
Helena, AR 72342

Dear Mr. Heath Albers:

Project Description: One (1) water sample(s) collected by AIC personnel
Aluminum Process
P.O. No. 4900127

This report is the analytical results and supporting information for the sample submitted to American Interplex Corporation (AIC) on July 24, 2006. The following results are applicable only to the sample identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the appropriate laboratory director or a qualified designee.

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

AMERICAN INTERPLEX CORPORATION

By _____
John Overbey
Laboratory Director

Enclosure(s): Chain of Custody

AMERICAN INTERPLEX CORPORATION

Enclosure(s) Check in Courtesy

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 1°C

Receipt Verification:	Complete Chain of Custody	Y
	Sample ID on Sample Labels	Y
	Date and Time on Sample Labels	Y
	Proper Sample Containers	Y
	Within Holding Times	Y
	Adequate Sample Volume	Y
	Sample Integrity	Y
	Proper Temperature	Y
	Proper Preservative	Y

QUALIFIERS

Qualifiers	Definition
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", 20th edition, 1998.

"American Society for Testing and Materials" (ASTM).

"Association of Analytical Chemists" (AOAC).

"Self-Davis and Moore" (2000).

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

ANALYTICAL RESULTS

AIC No. 101788-1
Sample Identification: Effluent 7-24-06 1055

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	EPA 335.2	< 0.01	0.01	mg/l	W17659	
Arsenic	EPA 200.8	< 0.05	0.05	mg/l	S18542	
Chromium	EPA 200.8	0.019	0.007	mg/l	S18542	
Copper	EPA 200.8	< 0.006	0.006	mg/l	S18542	
Nickel	EPA 200.8	< 0.01	0.01	mg/l	S18561	
Zinc	EPA 200.8	0.16	0.002	mg/l	S18542	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

SAMPLE PREPARATION REPORT

AIC No. 101788-1

Analyte	Date/Time Prepared	By	Date/Time Analyzed	By	Dilution	Batch	Qualifier
Total Cyanide	-		25JUL06 0754	240		W17659	
Metals	24JUL06 1507	259	24JUL06 1938	117		S18542	
Metals	26JUL06 1122	259	27JUL06 1309	117		S18561	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

SAMPLE DUPLICATE RESULTS

AIC No. 101788-1

Analyte	Method	Sample Result	Duplicate Result	Units	RPD	RPD Limit	Batch	Qualifier
Cyanide	EPA 335.2	< 0.01	< 0.01	mg/l	0.00	20	W17659	

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.2 mg/l	96.0	85-115	-		W17659	
Arsenic	0.05 mg/l	93.0	85-115	-	20	S18542	
Chromium	0.05 mg/l	94.3	85-115	-		S18542	
Chromium	0.05 mg/l	98.8	85-115	-	20	S18561	
Copper	0.05 mg/l	95.4	85-115	-	20	S18542	
Copper	0.05 mg/l	99.8	85-115	-	20	S18561	
Nickel	0.05 mg/l	95.3	85-115	-		S18542	
Nickel	0.05 mg/l	98.1	85-115	-	20	S18561	
Zinc	0.05 mg/l	97.2	85-115	-	20	S18542	
Zinc	0.05 mg/l	101	85-115	-	20	S18561	

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.2 mg/l	93.0	75-125	-		W17659	
Arsenic	0.05 mg/l	82.2/88.5	75-125	7.36	20	S18542	
Chromium	0.05 mg/l	- / -	75-125	-		S18542	X
Chromium	0.05 mg/l	99.9/102	75-125	2.25	20	S18561	
Copper	0.05 mg/l	76.6/85.0	75-125	7.46	20	S18542	
Copper	0.05 mg/l	- / -	75-125	1.11	20	S18561	X
Nickel	0.05 mg/l	- / -	75-125	0.155	20	S18561	X
Zinc	0.05 mg/l	75.6/83.1	75-125	7.33	20	S18542	
Zinc	0.05 mg/l	- / -	75-125	6.59	20	S18561	X

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	QC Sample	Qualifier
Cyanide	EPA 335.2	< 0.01	mg/l	0.01	W17659-1	
Arsenic	EPA 200.8	< 0.05	mg/l	0.05	S18542-1	
Chromium	EPA 200.8	< 0.007	mg/l	0.007	S18542-1	
Copper	EPA 200.8	< 0.006	mg/l	0.006	S18542-1	
Zinc	EPA 200.8	< 0.002	mg/l	0.002	S18542-1	
Nickel	EPA 200.8	< 0.01	mg/l	0.01	S18561-1	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

QUALITY CONTROL PREPARATION REPORT

DUPLICATE SAMPLES

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Cyanide	-	25JUL06 0755 240		W17659-4	

LABORATORY CONTROL SAMPLES

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Cyanide	-	25JUL06 0755 240		W17659-2	
Metals	24JUL06 1020 259	24JUL06 1758 117		S18542-2	
Metals	26JUL06 1004 259	27JUL06 1149 117		S18561-2	

MATRIX SPIKE SAMPLES

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Cyanide	-	25JUL06 0755 240		W17659-3	
Metals	24JUL06 1020 259	24JUL06 1805 117		S18542-3	X
Metals	24JUL06 1020 259	24JUL06 1811 117		S18542-4	X
Metals	26JUL06 1004 259	27JUL06 1156 117		S18561-3	X
Metals	26JUL06 1004 259	27JUL06 1203 117		S18561-4	X

LABORATORY BLANKS

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Cyanide	-	25JUL06 0755 240		W17659-1	
Metals	24JUL06 1020 259	24JUL06 1751 117		S18542-1	
Metals	26JUL06 1004 259	27JUL06 1143 117		S18561-1	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: Ameramax Coated Products
Project Reference: Aluminum Process
Project Manager:
Sampled By: Eugene Hopton

PO No.

SAMPLE MATRIX: WATER, SOIL

NO OF BOTTLES

ANALYSES REQUESTED: Cr, Zn, As, Ni, Cu; Cu, T

AIC CONTROL NO: 101785
AIC PROPOSAL NO:
Carrier: AIC
Received Temperature C: 1
Remarks

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL	NO OF BOTTLES	Cr, Zn, As, Ni, Cu	Cu, T
	Effluent	7-24-06 1055	X		X		1	X	X
		Container Type						P	P
		Preservative						N	B

Field pH calibration on ____ @ ____ 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

Turnaround Time Requested: (Please circle)
NORMAL or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: _____
Phone: _____ Fax: _____
Report Attention to:
Report Address to:

Relinquished By:	Date/Time	Received By:	Date/Time
Eugene Hopton	7-24-06 1310		
Relinquished By:	Date/Time	Received in Lab By:	Date/Time
		Dana Purdue	7-24-06 1310

Comments: Tech. Time = 4.75 Hours / 250 miles
Sampled Per EPA-600/4-82-029

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CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE 1 OF 1

| Client | | |

AMERICAN INTERPLEX CORPORATION
LABORATORIES

August 3, 2006
Control No. 101940

Amerimax Coated Products, Inc.
ATTN: Mr. Heath Albers
215 Phillips 324 Road
Helena, AR 72342

Dear Mr. Heath Albers:

Project Description: One (1) water sample(s) collected by AIC personnel
Zinc Process
P.O. No. 4900127

This report is the analytical results and supporting information for the sample submitted to American Interplex Corporation (AIC) on July 27, 2006. The following results are applicable only to the sample identified by the control number referenced above. Accurate assessment of the data requires access to the entire document. Each section of the report has been reviewed and approved by the appropriate laboratory director or a qualified designee.

Data has been validated using standard quality control measures performed on at least 10% of the samples analyzed. Quality Assurance, instrumentation, maintenance and calibration were performed in accordance with guidelines established by the cited methodology.

AMERICAN INTERPLEX CORPORATION

By _____
John Overbey
Laboratory Director

Enclosure(s): Chain of Custody

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

CASE NARRATIVE

SAMPLE RECEIPT

Received Temperature: 1°C

Receipt Verification:	Complete Chain of Custody	Y
	Sample ID on Sample Labels	Y
	Date and Time on Sample Labels	Y
	Proper Sample Containers	Y
	Within Holding Times	Y
	Adequate Sample Volume	Y
	Sample Integrity	Y
	Proper Temperature	Y
	Proper Preservative	Y

QUALIFIERS

Qualifiers	Definition
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", 20th edition, 1998.

"American Society for Testing and Materials" (ASTM).

"Association of Analytical Chemists" (AOAC).

"Self-Davis and Moore" (2000).

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

ANALYTICAL RESULTS

AIC No. 101940-1
Sample Identification: Outfall 7-27-06 1055

Analyte	Method	Result	RL	Units	Batch	Qualifier
Total Cyanide	EPA 335.2	< 0.01	0.01	mg/l	W17721	
Arsenic	EPA 200.8	< 0.05	0.05	mg/l	S18579	
Chromium	EPA 200.8	< 0.007	0.007	mg/l	S18579	
Copper	EPA 200.8	0.0085	0.006	mg/l	S18579	
Nickel	EPA 200.8	< 0.01	0.01	mg/l	S18579	
Zinc	EPA 200.8	0.19	0.002	mg/l	S18579	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

SAMPLE PREPARATION REPORT

AIC No. 101940-1

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	Batch	Qualifier
Total Cyanide	-	31JUL06 1534 07		W17721	
Metals	28JUL06 0912 259	28JUL06 1757 117		S18579	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

SAMPLE DUPLICATE RESULTS

AIC No. 101940-1

Analyte	Method	Sample Result	Duplicate Result	Units	RPD	RPD Limit	Batch	Qualifier
Arsenic	EPA 200.8	< 0.05	< 0.05	mg/l	0.00	20	S18579	
Chromium	EPA 200.8	< 0.007	0.0081	mg/l	0.136	20	S18579	
Copper	EPA 200.8	0.0085	0.0085	mg/l	1.97	20	S18579	
Nickel	EPA 200.8	< 0.01	< 0.01	mg/l	0.00	-	S18579	
Zinc	EPA 200.8	0.19	0.18	mg/l	2.35	20	S18579	

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.2 mg/l	95.0	85-115	-	20	W17721	
Arsenic	0.05 mg/l	97.2	85-115	-	20	S18579	
Chromium	0.05 mg/l	99.0	85-115	-	20	S18579	
Copper	0.05 mg/l	100	85-115	-	20	S18579	
Nickel	0.05 mg/l	99.6	85-115	-	20	S18579	
Zinc	0.05 mg/l	103	85-115	-	20	S18579	

MATRIX SPIKE SAMPLE RESULTS

Analyte	Spike Amount	% Recovery	% Recovery Limits	RPD	RPD Limit	Batch	Qualifier
Cyanide	0.2 mg/l	87.0/85.0	75-125	2.33	20	W17721	
Arsenic	0.05 mg/l	89.9/93.6	75-125	4.06	20	S18579	
Chromium	0.05 mg/l	91.9/96.6	75-125	4.74	20	S18579	
Copper	0.05 mg/l	91.2/95.2	75-125	4.09	20	S18579	
Nickel	0.05 mg/l	91.0/94.4	75-125	3.69	20	S18579	
Zinc	0.05 mg/l	- / -	75-125	0.804	20	S18579	X

LABORATORY BLANK RESULTS

Analyte	Method	Result	Units	RL	QC Sample	Qualifier
Cyanide	EPA 335.2	< 0.01	mg/l	0.01	W17721-1	
Arsenic	EPA 200.8	< 0.05	mg/l	0.05	S18579-1	
Chromium	EPA 200.8	< 0.007	mg/l	0.007	S18579-1	
Copper	EPA 200.8	< 0.006	mg/l	0.006	S18579-1	
Nickel	EPA 200.8	< 0.01	mg/l	0.01	S18579-1	
Zinc	EPA 200.8	< 0.002	mg/l	0.002	S18579-1	

AMERICAN INTERPLEX CORPORATION
LABORATORIES

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

QUALITY CONTROL PREPARATION REPORT

DUPLICATE SAMPLES

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Metals	28JUL06 0913 259	28JUL06 1751 117		S18579-5	

LABORATORY CONTROL SAMPLES

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Cyanide	-	31JUL06 0906 07		W17721-2	
Metals	28JUL06 0913 259	28JUL06 1731 117		S18579-2	

MATRIX SPIKE SAMPLES

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Cyanide	-	31JUL06 0906 07		W17721-3	
Cyanide	-	31JUL06 0906 07		W17721-4	
Metals	28JUL06 0913 259	28JUL06 1737 117		S18579-3	X
Metals	28JUL06 0913 259	28JUL06 1744 117		S18579-4	X

LABORATORY BLANKS

Analyte	Date/Time Prepared By	Date/Time Analyzed By	Dilution	QC Sample	Qualifier
Cyanide	-	31JUL06 0906 07		W17721-1	
Metals	28JUL06 0913 259	28JUL06 1724 117		S18579-1	

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AMERICAN INTERPLEX CORPORATION
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CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE OF

Client: Amerimax Coated Products
Project Reference: Zinc Process
Project Manager:
Sampled By: Eugene Hopton

PO No.

SAMPLE MATRIX: W A T E R | S O I L

NO OF BOTTLES

ANALYSES REQUESTED: (Cr, Zn, As, Ni, Cu) | CN, T

AIC CONTROL NO: 101940
AIC PROPOSAL NO:
Carrier: AIC
Received Temperature C: 1
Remarks

AIC No.	Sample Identification	Date/Time Collected	GRAB	COMP	WATER	SOIL		NO OF BOTTLES	(Cr, Zn, As, Ni, Cu)	CN, T
1	Outfall	7-27-06 1055	X		X			2	X	X
		Container Type							P	P
		Preservative							N	B

Field pH calibration on ____ @ ____ 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

Turnaround Time Requested: (Please circle)
NORMAL or EXPEDITED IN ____ DAYS
Expedited results requested by: _____
Who should AIC contact with questions: _____
Phone: _____ Fax: _____
Report Attention to:
Report Address to:

Relinquished By:	Date/Time	Received By:	Date/Time
Eugene Hopton	7-27-06 1415		
Relinquished By:	Date/Time	Received in Lab By:	Date/Time
			27/Jul/06 1415

Comments: (Tech. Time 4.75 Hours) mileage: 250 miles
Sampled Per EPA-600/4-82-029

5/01 WS 5981 8/02 FORM 0060

AMERICAN INTERPLEX CORPORATION
LABORATORIES

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM