

Peltier, Hannah

From: Torrence, Rufus
Sent: Wednesday, March 06, 2013 10:44 AM
To: droach@amerimax.com
Cc: Peltier, Hannah
Subject: AFIN 54-00132 AR0043389 Amerimax August 2012 Semi-Annual Report
Attachments: AMX Feb 2013 SAR.pdf

ADEQ

ARKANSAS
Department of Environmental Quality

March 5, 2013

Mr. Dan Roach
Amerimax Coated Products
215 Phillips 324 Road
Helena, AR 72342

Re: Amerimax February 2013 Semi-Annual Report
(Permit No. AR000043389 AFIN 54-00132)

Dear Mr. Roach:

The Department has reviewed Amerimax's February 2013 Semi-annual Pretreatment Report and the report is complete. However, the Department has concerns.

(1). Since the math model assumes all wastewater is collected in one tank for each line, all measured concentrations must comply with the calculated allowable monthly limit. The model does not allow Amerimax to calculate a "Maximum for any 1 day" allowable limit. Therefore, all the measured concentrations must also comply with the allowable monthly limit including the maximum measured concentration. The report shows that Amerimax is compliant with this requirement.

(2) Amerimax did not show the correct allowable limits in the chart in Section 5.C in the report. The Department inserted the correct limits. Note that limits for both the Galvanized line and Aluminum line must be shown to verify compliance.

(3) Amerimax must sample the wastewater for the “Galvanized line” when the facility is coating galvanized steel and, similarly, Amerimax must sample the wastewater for the “Aluminum line” when the facility is coating aluminum.

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,

A handwritten signature in black ink that reads "Rufus Torrence". The signature is written in a cursive style with a large, sweeping initial "R".

Rufus Torrence, Pretreatment Engineer
Water Division

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5301 NORTHSHORE DRIVE • NORTH LITTLE ROCK • ARKANSAS 72111
www.adeq.state.ar.us

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																
<p>A. LEGAL NAME & MAILING ADDRESS</p> <p>Amerimax Coated Products, Inc. 215 Phillips 324 Road Helena, AR 72342</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p>Amerimax Coated Products, Inc. 215 Phillips 324 Road Helena, AR 72342</p>															
<p>C. FACILITY CONTACT: Dan Roach TELEPHONE NUMBER: (870) 572-5074</p>																
(2) REPORTING PERIOD--FISCAL YEAR From Aug 1 to Jul 31 (Both Semi-Annual Reports must cover Fiscal Year)																
<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p>August & February</p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p>FROM: September 2012 TO: February 2013</p>															
(3) DESCRIPTION OF OPERATION																
<p>A. REGULATED PROCESSES</p> <p>40 CFR Part 465 -- Coil Coating Point Source Category</p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="text-align: left;">PROCESS*</th> <th style="text-align: center;">PROD'N RATE(S) <small>Total for Six Months</small></th> <th style="text-align: center;">PROD'N DAYS <small>Number of Operating Days</small></th> </tr> </thead> <tbody> <tr> <td>Subpart A Steel</td> <td style="text-align: center;">N/P</td> <td style="text-align: center;">_____</td> </tr> <tr> <td>Subpart B Galv</td> <td style="text-align: center;">10,155,790 ft²</td> <td style="text-align: center;">15</td> </tr> <tr> <td>Subpart C Alum</td> <td style="text-align: center;">93,930,238 ft²</td> <td style="text-align: center;">137</td> </tr> <tr> <td>Subpart D Canmak</td> <td style="text-align: center;">N/P</td> <td style="text-align: center;">_____</td> </tr> </tbody> </table> <p style="font-size: small; margin-top: 10px;">*Show Rate & Days--If process is not present, show "Not Present" or "N/P".</p> <p style="font-size: large; margin-top: 20px;">Rec'd by email dated 2-28-2013 @ 4:07 pm</p> <p>① Only one production line; this line runs both galvanized and aluminum rolls.</p>	PROCESS*	PROD'N RATE(S) <small>Total for Six Months</small>	PROD'N DAYS <small>Number of Operating Days</small>	Subpart A Steel	N/P	_____	Subpart B Galv	10,155,790 ft ²	15	Subpart C Alum	93,930,238 ft ²	137	Subpart D Canmak	N/P	_____	<p>B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.</p> <p align="center" style="font-size: 2em; margin-top: 20px;">OR</p> <p style="font-size: 1.5em; margin-top: 20px;">AMX Feb 2013 SAR File date 2013 0304 AR 00 433 89 AR P00 10 44</p>
PROCESS*	PROD'N RATE(S) <small>Total for Six Months</small>	PROD'N DAYS <small>Number of Operating Days</small>														
Subpart A Steel	N/P	_____														
Subpart B Galv	10,155,790 ft ²	15														
Subpart C Alum	93,930,238 ft ²	137														
Subpart D Canmak	N/P	_____														
<p>C. Number of Regular Employees at this Facility <u>42</u></p>	<p>D. [Reserved] <u>SIC3479</u></p>															

ext 3224

X 3224

Req 2
Req 3

② Production must be entered into ANPCAN in square feet (10,76 sq ft / m²) and volume in gallons (3,785 liters/gallon) Page 1

③ The total number of prod'n days must be less than 182 (7 X 26 weeks => 182 days).

(4) FLOW MEASUREMENT (CON'D)

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

Reg 2
Reg 3

Operation	Ave Tot Flow ¹	Max Tot Flow ²	Type of Discharge	No. Disc Days
Regulated: Steel Basis	N/P			
Regulated: Galv Basis	3,571.3	20,541.6		15
Regulated: Alum Basis	3,571.3	20,541.6		137
Regulated: Canmaking	N/P			
Total Regulated				
§403.6(e) Unregulated ³				
§403.6(e) Dilute				
Cooling Water				
Sanitary	1,425	1,425	continuous	
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	Cu	Pb	Ni	Ag	Zn	O&G	CN*	Phen	TTO*
MEC (mg/l)		N/A	N/A				N/A		N/A		
AEC (mg/l)	5.12 ALUM	0.134 0.334	0.10				0.70 0.92 0.94		0.13 0.17 0.16		
AMMC (mg/l)		<0.007 Alum and Galv	<0.006 Galv				0.19 Alum 0.20 Galv		<0.01 Alum and Galv		
AMAC (mg/l)		<0.007 Alum and Galv	<0.006 Galv				0.19 Alum 0.20 Galv		<0.01 Alum and Galv		

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

Sample Location FINAL EFFLUENT TANK

Sample Type (Grab or Composite) GRAB

Number of Samples and Frequency Collected 2 - SEMIANNUALLY

40CFR136 Preservation and Analytical Methods Use: Yes No

(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(f)]

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.

Dan Roach
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Plant Manager
OFFICIAL TITLE


SIGNATURE

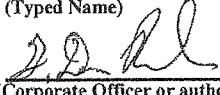
2/28/13
DATE SIGNED

(6) CERTIFICATION

A. CHECK ONE: CYANIDE ANALYSIS ATTACHED PROVIDED BELOW 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.

Dan Roach
(Typed Name)


(Corporate Officer or authorized representative signature)

Date of Signature 2/28/13

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 _____.

TOTAL	3288	360	542,835	489,266	53,569
	Alum Hours	Galv Hours	Total Gal	Alum Gal	Galv Gal

Amerimax Average Flows and Rates for the Six Month Period

	Aluminum	Galvanized	
Average Flow (GPD) per Six Months =	2688.27	294.34	gpd
Average Production Rate (sq-ft/day) =	47,965	5,186	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 surfact area (sq-m). Therefore, the volume of wastewater discharged in the six month period for each operation equals:

Alum:	Total Alum gallons X 3.785 liters/gallon=	1,851,872 liters
Galv:	Total Galv gallons X 3.785 iters/gallon =	202,760 liters

The surface area coated for each operation equals:

Alum:	total sq-ft / 10.76 sq-ft/sq-meter=	8,729,576 sq-meters
Galv:	total sq-ft / 10.76 sq-ft/sq-meter=	943,847 sq-meters

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

	Galvanized	
Chromium:	0.052 mg/sq-m X 943847 sq-m =	49,080 mg
Copper:	0.21 mg/sq-m X 943847 sq-m =	198,208 mg
Cyanide:	0.028 mg/sq-m X 943847 sq-m =	26,428 mg
Zinc:	0.15 mg/sq-m X 943847 sq-m =	141,577 mg

	Aluminum	
Chromium:	0.72 mg/sq-m X 8729576 sq-m =	628,529 mg
Cyanide:	0.038 mg/sq-m X 8729576 sq-m =	331,724 mg
Zinc:	0.20 mg/sq-m X 8729576 sq-m =	1,745,915 mg

The math model assumes two plants (one which coats alum and the other coats galv). We can also assume that an the wastewater during a six month period is captured in two tanks. One tank contains all the wastewater for the alum plant and has 1851872 liters in it. The other tanks contains all the wastewater from the galv plant and has 202760 liters in it. The concentrations of metals in the tanks are:

	Galvanized	
Chromium:	49080 mg / 202760 liters =	0.24 mg/l
Copper:	198208 mg / 202760 liters =	0.98 mg/l
Cyanide:	26428 mg / 202760 liters =	0.13 mg/l
Zinc:	141577 mg / 202760 liters =	0.70 mg/l
	Aluminum	
Chromium:	628529 mg / 1851872 liters =	0.34 mg/l
Cyanide:	331724 mg / 1851872 liters =	0.18 mg/l
Zinc:	1745915 mg / 1851872 liters =	0.94 mg/l

Correct allowable monthly limits

AMX_Production_Based_Standards

AMERIMAX COATED PRODUCTS

HELENA, AR

Report Date: September 2012 to February 2013

	Data Entry Col	
Total days in reporting period	152.00	
Total Flow for the period (gal)	542,835	
Average Flow (gpd)	3,571.29	13,517.31 liters/day
Max Flow (gpd)	20,541.60	77,749.96 liters/day

Galvanized Line		
Prod'n Rate (Total Sq Footage for 3/1/2012 thru 8/31/2012) ..	10,155,790	943,847 m ²

Aluminum Line		
Prod'n Rate (Total Sq Footage for 9/1/2011 thru 1/12/2012) ..	93,930,238	8,729,576 m ²

	Cr	CN	Zn	Cu
Daily Maximum Aluminum				
465.35 Regulatory Allowance (mg/sqmeter)	0.18	0.085	0.49	
Plant Allowable (mg/period)	1,571,324	826,310	4,277,482	
(ex. Cr: 93930238 / 10.76 * 0.18 = 1571324)				
Daily Maximum Galvanized Steel				
465.25 Regulatory Allowance (mg/sqmeter)	0.13	0.07	0.35	0.44
Plant Allowable (mg/period)	122,700	66,069	330,346	415,293
(ex. Cr: 10155790 / 10.76 * 0.13 = 122700)				

Daily Maximum

Plant Allowable (mg/day)	11144.89	5890.65	30314.73	2732.19
(ex. Cr: (1571324 + 122700) / 152 = 11144.89)				

Plant Allowable (mg/liter)	0.14	0.08	0.39	0.04
(ex. Cr: 11144 / 77749.96 = 0.82)				

Measured (mg/liter) (during aluminum production)	<0.007	<0.01	0.190	
Measured (mg/liter) (during galvanized production)	<0.007	<0.01	0.200	<0.006

Monthly Average Aluminum				
465.35 Regulatory Allowance (mg/sqmeter)	0.072	0.039	0.20	
Plant Allowable (mg/period)	628,529	331,724	1,745,915	
(ex. Cr: 93930238 / 10.76 * 0.072 = 628529)				

Monthly Average Galvanized Steel				
465.25 Regulatory Allowance (mg/sqmeter)	0.052	0.028	0.15	0.21
Plant Allowable (mg/period)	49,080	26,428	141,577	198,209
(ex. Cr: 10155790 / 10.76 * 0.052 = 49080)				

Monthly Average

Plant Allowable (mg/day)	4457.96	2356.26	12417.71	1304.00
(ex. Cr: (628529 + 49080) / 152 = 4457.96)				

Plant Allowable (mg/liter)	0.33	0.17	0.32	0.10
(ex. Cr: 4458 / 13517.31 = 0.33)				

Measured (mg/liter) (during aluminum production)	<0.007	<0.01	0.190	
Measured (mg/liter) (during galvanized production)	<0.007	<0.01	0.200	<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.

Does not comply with model. Model assumes all wastewater flows to two tanks and allowable conc limits are independent of the number of days in reporting period.



CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

Client: AMERIMAX			PO No.		No of BOTTLES	Analyses Requested										AIC Control No: 164579	
Project Reference: WASTE WATER SAMPLES			Sample Matrix			CR, CM, ZN, Cu	CR, CM, ZN	CR, CM, ZN, Cu	CR, CM, ZN								
Project Manager: GORDON DOCKERY			WATER	SOIL													
Sampled By:			GRA	COMP													Received Temperature °C 15.7
AIC No.	Sample Identification	Date/Time Collected															Remarks
1	GALV RUN 1	2-1-13 9AM			✓												
1	GALV RUN 2	2-1-13 9AM			✓												
2	ALVA RUN 3	2-1-13 4AM			✓												
2	ALVA RUN 4	2-1-13 4AM			✓												
			Container Type														Field pH calibration on _____ @ _____
			Preservative														Buffer:
			G = Glass NO = none		P = Plastic S = Sulfuric acid pH2		V = VOA vials N = Nitric acid pH2		H = HCl to pH2 B = NaOH to pH12			T = Sodium Thiosulfate Z = Zinc acetate					
Turnaround Time Requested: (Please circle) NORMAL or EXPEDITED IN <u>10</u> DAYS					Relinquished By:		Date/Time		Received By:		Date/Time						
Expedited results requested by: <u>GORDON DOCKERY</u>					Relinquished By:		Date/Time		Received in Lab By:		Date/Time						
Who should AIC contact with questions: <u>GORDON DOCKERY</u>											9:30A						
Phone: <u>870 995 0574</u> Fax: _____																	
Report Attention to: <u>GORDON DOCKERY</u>																	
Report Address to: <u>215 P.C. 324, HELINA, AR 72342</u>																	
<u>GDOCKERY@AMERIMAX.COM</u>																	
													<u>(2781 827 03 1005 8521)</u>				



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

ANALYTICAL RESULTS

AIC No. 164579-1

Sample Identification: GALV Run 1,2 2-1-13 9am

Analyte	Result	RL	Units	Qualifier
Total Cyanide SM 4500-CN C,E Prep: 04-Feb-2013 0950 by 302	< 0.01	0.01	mg/l	
	Analyzed: 04-Feb-2013 1807 by 302		Batch: W42432	
Chromium EPA 200.7 Prep: 04-Feb-2013 1330 by 271	< 0.007	0.007	mg/l	
	Analyzed: 05-Feb-2013 1334 by 305		Batch: S33952	
Copper EPA 200.7 Prep: 04-Feb-2013 1330 by 271	< 0.006	0.006	mg/l	
	Analyzed: 04-Feb-2013 2026 by 305		Batch: S33952	
Zinc EPA 200.7 Prep: 04-Feb-2013 1330 by 271	0.20	0.002	mg/l	
	Analyzed: 04-Feb-2013 2026 by 305		Batch: S33952	

AIC No. 164579-2

Sample Identification: ALUM Run 3,4 2-1-13 4pm

Analyte	Result	RL	Units	Qualifier
Total Cyanide SM 4500-CN C,E Prep: 04-Feb-2013 0950 by 302	< 0.01	0.01	mg/l	
	Analyzed: 04-Feb-2013 1809 by 302		Batch: W42432	
Chromium EPA 200.7 Prep: 04-Feb-2013 1330 by 271	< 0.007	0.007	mg/l	
	Analyzed: 05-Feb-2013 1339 by 305		Batch: S33952	
Zinc EPA 200.7 Prep: 04-Feb-2013 1330 by 271	0.19	0.002	mg/l	
	Analyzed: 04-Feb-2013 1820 by 305		Batch: S33952	



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

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	0.1 mg/l	105	85.0-115			W42432	04Feb13 0950 by 302	04Feb13 1743 by 302		
Chromium	0.5 mg/l	99.5	85.0-115			S33952	04Feb13 1330 by 271	05Feb13 1403 by 305		
Copper	0.5 mg/l	98.9	85.0-115			S33952	04Feb13 1330 by 271	04Feb13 1845 by 305		
Zinc	0.5 mg/l	100	85.0-115			S33952	04Feb13 1330 by 271	04Feb13 1845 by 305		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	164470-1	0.1 mg/l	99.8	75.0-125	W42432	04Feb13 0950 by 302	04Feb13 1747 by 302		
	164470-1	0.1 mg/l	102	75.0-125	W42432	04Feb13 0950 by 302	04Feb13 1748 by 302		
	Relative Percent Difference:		2.49	20.0	W42432				
Chromium	164560-1	0.5 mg/l	97.2	75.0-125	S33952	04Feb13 1330 by 271	05Feb13 1407 by 305		
	164560-1	0.5 mg/l	92.8	75.0-125	S33952	04Feb13 1330 by 271	05Feb13 1412 by 305		
	Relative Percent Difference:		4.44	20.0	S33952				
Copper	164560-1	0.5 mg/l	98.5	75.0-125	S33952	04Feb13 1330 by 271	04Feb13 1850 by 305		
	164560-1	0.5 mg/l	97.9	75.0-125	S33952	04Feb13 1330 by 271	04Feb13 1854 by 305		
	Relative Percent Difference:		0.595	20.0	S33952				
Zinc	164560-1	0.5 mg/l	92.1	75.0-125	S33952	04Feb13 1330 by 271	04Feb13 1850 by 305		
	164560-1	0.5 mg/l	91.4	75.0-125	S33952	04Feb13 1330 by 271	04Feb13 1854 by 305		
	Relative Percent Difference:		0.676	20.0	S33952				

LABORATORY BLANK RESULTS

Analyte	Result	RL	PQL	QC Sample	Preparation Date	Analysis Date	Qual
Total Cyanide	< 0.01 mg/l	0.01	0.01	W42432-1	04Feb13 0950 by 302	04Feb13 1741 by 302	
Chromium	< 0.007 mg/l	0.007	0.007	S33952-1	04Feb13 1330 by 271	05Feb13 1356 by 305	
Copper	< 0.006 mg/l	0.006	0.006	S33952-1	04Feb13 1330 by 271	04Feb13 1841 by 305	
Zinc	< 0.002 mg/l	0.002	0.002	S33952-1	04Feb13 1330 by 271	04Feb13 1841 by 305	