

Wilson, Tabatha

From: Torrence, Rufus
Sent: Tuesday, September 10, 2013 4:18 PM
To: mstrozensky@euramax.com
Cc: Wilson, Tabatha
Subject: AR0043389 AFIN 54-00132 August 2013 Semi-Annual Report
Attachments: AMX Aug 2013 SAR.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

ADEQ

**A R K A N S A S
Department of Environmental Quality**

September 9, 2013

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

Re: AMX's August 2013 Semi-Annual Report
(Permit No. AR0043389 AFIN 54-00132)

Dear Mr. Strozensky:

The Department has reviewed Amerimax's August 2013 Semi-annual Pretreatment Report and the report is complete. However, the Department noticed that the Zinc concentration was high (6.1 mg/l) but it did not exceed the allowable limit (9.13 mg/l). Nonetheless, Amerimax should strive to operate the treatment system at optimal performance at all times to remove as much pollutants as possible. Amerimax reported only 0.19 mg/l of zinc in the effluent on the last report submitted to ADEQ.

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 blue ink that reads "Rufus Torrence". The signature is written in a cursive style with a large, prominent "T" and "R".

Rufus Torrence, Pretreatment Engineer
Water Division

ARKANSAS DEPARTMENT OF
5301 NORTHSHORE DRIVE • NORTH LITTLE ROCK • ARKANSAS
72116-0001

AMERIMAX September 2013 Report

AR0043389 AFIN 54-00132

Discharge Days:	Total	Alum	Galv
Discharge Volume (liters):	172	152	20
	195,422	172,869	22,554

Average Discharge Volume (gal/day): 300.18
 Maximum Discharge Volume (gal/day): 2,847.45

Amerimax Average Flows and Rates for the Six Month Period

Average Production Rate (sq-ft/day) =	Aluminum	Galvanized	sq-m/day
	57,843	9,086	

Allowable Limits for the Six Month Period

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

Alum: Total Alum gallons X 3.785 liters/gallon = 172,869 liters
 Galv: Total Galv gallons X 3.785 liters/gallon = 22,554 liters

The surface area coated for each operation equals:

Alum: total sq-ft / 10.76 sq-ft/sq-meter = 10,527,444 sq-meters
 Galv: total sq-ft / 10.76 sq-ft/sq-meter = 1,373,502 sq-meters

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

**ADEQ Notes:
 Filedated 20130909
 Non Pret Cities
 Pret City IUs**

Galvanized

Chromium: 0.052 mg/sq-m X 1373502 sq-m = 71,422 mg
 Copper: 0.21 mg/sq-m X 1373502 sq-m = 288,435 mg
 Cyanide: 0.028 mg/sq-m X 1373502 sq-m = 38,458 mg
 Zinc: 0.15 mg/sq-m X 1373502 sq-m = 206,025 mg

Aluminum

Chromium: 0.72 mg/sq-m X 10527444 sq-m = 757,976 mg
 Cyanide: 0.038 mg/sq-m X 10527444 sq-m = 400,043 mg
 Zinc: 0.20 mg/sq-m X 10527444 sq-m = 2,105,489 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 172869 liters in it. The other tanks contains all the wastewater from the galv plant and has 22554 liters in it. The concentrations of metals in the tanks are:

Galvanized

Chromium: 71422 mg / 22554 liters = 3.17 mg/l
 Copper: 288435 mg / 22554 liters = 12.79 mg/l
 Cyanide: 38458 mg / 22554 liters = 1.71 mg/l
 Zinc: 206025 mg / 22554 liters = 9.13 mg/l

Aluminum

Chromium: 757976 mg / 172869 liters = 4.38 mg/l
 Cyanide: 400043 mg / 172869 liters = 2.31 mg/l
 Zinc: 2105489 mg / 172869 liters = 12.18 mg/l

Site Name	4230 Flow Meter
Isco Quantity Label	Volume Flow Volume
Units	l
Resolution	0.1
Significant Digits	0
2/1/2013 0:00	3356.29
2/2/2013 0:00	267.95
2/3/2013 0:00	165.002
2/4/2013 0:00	2004.04
2/5/2013 0:00	343.233
2/6/2013 0:00	428.33
2/7/2013 0:00	1943.06
2/8/2013 0:00	32.722
2/9/2013 0:00	1213.86
2/10/2013 0:00	0
2/11/2013 0:00	1443.65
2/12/2013 0:00	1942.83
2/13/2013 0:00	83.332
2/14/2013 0:00	3199.21
2/15/2013 0:00	622.245
2/16/2013 0:00	110.489
2/17/2013 0:00	0
2/18/2013 0:00	215.206
2/19/2013 0:00	175.208
2/20/2013 0:00	66.624
2/21/2013 0:00	0.953
2/22/2013 0:00	6193.71
2/23/2013 0:00	1614.86
2/24/2013 0:00	344.625
2/25/2013 0:00	616.446
2/26/2013 0:00	2033.32
2/27/2013 0:00	1742.75
2/28/2013 0:00	136.256
3/1/2013 0:00	15.344
3/2/2013 0:00	0
3/3/2013 0:00	0
3/4/2013 0:00	0
3/5/2013 0:00	1563.77
3/6/2013 0:00	1302.49
3/7/2013 0:00	163.329
3/8/2013 0:00	1712.48
3/9/2013 0:00	1896.84
3/10/2013 0:00	18.609
3/11/2013 0:00	1620.98
3/12/2013 0:00	1659.57

3/13/2013 0:00	2654.01
3/14/2013 0:00	5881.54
3/15/2013 0:00	5552.61
3/16/2013 0:00	0
3/17/2013 0:00	0
3/18/2013 0:00	3654.13
3/19/2013 0:00	93.345
3/20/2013 0:00	4374.62
3/21/2013 0:00	7461
3/22/2013 0:00	4136.66
3/23/2013 0:00	7988.98
3/24/2013 0:00	1225.94
3/25/2013 0:00	0.195
3/26/2013 0:00	2995.01
3/27/2013 0:00	3883.61
3/28/2013 0:00	1968.83
3/29/2013 0:00	2546.65
3/30/2013 0:00	305.596
3/31/2013 0:00	0
4/1/2013 0:00	0
4/2/2013 0:00	0
4/3/2013 0:00	0
4/4/2013 0:00	171.159
4/5/2013 0:00	2991.47
4/6/2013 0:00	198.783
4/7/2013 0:00	0
4/8/2013 0:00	2520.58
4/9/2013 0:00	1592.36
4/10/2013 0:00	214.99
4/11/2013 0:00	1325.94
4/12/2013 0:00	90.166
4/13/2013 0:00	1553.37
4/14/2013 0:00	1354.02
4/15/2013 0:00	73.239
4/16/2013 0:00	0
4/17/2013 0:00	1461.78
4/18/2013 0:00	1488.42
4/19/2013 0:00	1474.12
4/20/2013 0:00	122.542
4/21/2013 0:00	1426.44
4/22/2013 0:00	623.517
4/23/2013 0:00	1186.45
4/24/2013 0:00	1298.46
4/25/2013 0:00	2526.4
4/26/2013 0:00	1369.62
4/27/2013 0:00	1479.93
4/28/2013 0:00	0

4/29/2013 0:00	1398.52
4/30/2013 0:00	1183.2
5/1/2013 0:00	0
5/2/2013 0:00	0
5/3/2013 0:00	0
5/4/2013 0:00	0
5/5/2013 0:00	0
5/6/2013 0:00	27.114
5/7/2013 0:00	1354.93
5/8/2013 0:00	372.181
5/9/2013 0:00	109.477
5/10/2013 0:00	1466.91
5/11/2013 0:00	0
5/12/2013 0:00	0
5/13/2013 0:00	0
5/14/2013 0:00	1414.04
5/15/2013 0:00	1543.36
5/16/2013 0:00	1420.99
5/17/2013 0:00	77.572
5/18/2013 0:00	1501.02
5/19/2013 0:00	0
5/20/2013 0:00	1285.12
5/21/2013 0:00	21.486
5/22/2013 0:00	2996.55
5/23/2013 0:00	0
5/24/2013 0:00	1551.28
5/25/2013 0:00	1405.37
5/26/2013 0:00	0
5/27/2013 0:00	0
5/28/2013 0:00	1186.05
5/29/2013 0:00	88.453
5/30/2013 0:00	2128.85
5/31/2013 0:00	1750.93
6/1/2013 0:00	994.244
6/2/2013 0:00	660.463
6/3/2013 0:00	0
6/4/2013 0:00	807.473
6/5/2013 0:00	0
6/6/2013 0:00	946.464
6/7/2013 0:00	1072.44
6/8/2013 0:00	858.657
6/9/2013 0:00	1775.31
6/10/2013 0:00	175.761
6/11/2013 0:00	4824.62
6/12/2013 0:00	2096.72
6/13/2013 0:00	9957.72
6/14/2013 0:00	5838.1

6/15/2013 0:00	68.362
6/16/2013 0:00	2018.75
6/17/2013 0:00	19.691
6/18/2013 0:00	50.073
6/19/2013 0:00	2336.52
6/20/2013 0:00	1786.19
6/21/2013 0:00	1966.75
6/22/2013 0:00	3762.18
6/23/2013 0:00	10777.6
6/24/2013 0:00	2578.91
6/25/2013 0:00	1579.75
6/26/2013 0:00	1117.48
6/27/2013 0:00	1233.66
6/28/2013 0:00	409.173
6/29/2013 0:00	1275.08
6/30/2013 0:00	1226.94
7/1/2013 0:00	1882.31
7/2/2013 0:00	1041.91
7/3/2013 0:00	0
7/4/2013 0:00	0
7/5/2013 0:00	0
7/6/2013 0:00	0
7/7/2013 0:00	0
7/8/2013 0:00	0
7/9/2013 0:00	1519.55
7/10/2013 0:00	2464.15
7/11/2013 0:00	86.222
7/12/2013 0:00	836.084
7/13/2013 0:00	2119.87
7/14/2013 0:00	323.693
7/15/2013 0:00	396.853
7/16/2013 0:00	1831.17
7/17/2013 0:00	2016.96
7/18/2013 0:00	0.241
7/19/2013 0:00	1079.93
7/20/2013 0:00	90.086
7/21/2013 0:00	630.034
7/22/2013 0:00	1094
7/23/2013 0:00	280.857
7/24/2013 0:00	4.977
7/25/2013 0:00	2.011
7/26/2013 0:00	3.013
7/27/2013 0:00	0
7/28/2013 0:00	0
7/29/2013 0:00	0.139
7/30/2013 0:00	0
7/31/2013 0:00	0

total 195422.4 March - July
discharge days 143

Extrapolated using (184 days in March - August) / (153 days in March - July)

total	235017.8	March - August
discharge days	172	

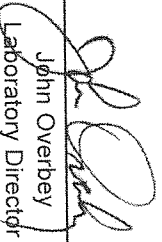


Amerimax Coated Products, Inc.
ATTN: Mr. Bryan Fowler
215 Phillips 324 Road
Helena, AR 72342

This report contains the analytical results and supporting information for samples submitted on August 29, 2013. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Laboratory Director or a qualified designee.



John Overbey
Laboratory Director

This document has been distributed to the following:

PDF cc: Amerimax Coated Products, Inc.
ATTN: Mr. Bryan Fowler
browler@amerimax.com



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

SAMPLE INFORMATION

Project Description:

Two (2) water sample(s) received on August 29, 2013
P.O. No. 2013

Receipt Details:

A Chain of Custody was not provided. The samples were delivered in one (1) ice chest.
Ice chest #1 was delivered with shipping documentation.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

<u>Laboratory ID</u>	<u>Client Sample ID</u>	<u>Sampled Date/Time</u>	<u>Notes</u>
170152-1	Steel 8-27-13 800	27-Aug-2013 0800	1
170152-2	Alum 8-19-13 1330	19-Aug-2013 1330	1

Notes:

1. Received temperature of samples did not meet regulatory requirements

Qualifiers:

H Analytical holding time exceeded regulatory requirements

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).
"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.
"Standard Methods for the Examination of Water and Wastewaters", 21st edition.
"American Society for Testing and Materials" (ASTM).
"Association of Analytical Chemists" (AOAC).



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

September 5, 2013
 Control No. 170152
 Page 3 of 5

ANALYTICAL RESULTS

AIC No. 170152-1
 Sample Identification: Steel 8-27-13 800

Analyte	Result	RL	Units	Qualifier
Total Cyanide SM 4500-CN C/E	Prep: 03-Sep-2013 0830 by 308 Analyzed: 04-Sep-2013 1034 by 308	0.01	mg/l Batch: W44765	
Aluminum EPA 200.7	Prep: 29-Aug-2013 1641 by 271	0.04	mg/l Batch: S35322	
Arsenic EPA 200.7	Prep: 29-Aug-2013 1641 by 271	0.05	mg/l Batch: S35322	
Chromium EPA 200.7	Prep: 29-Aug-2013 1641 by 271	< 0.007	mg/l Batch: S35322	
Copper EPA 200.7	Prep: 29-Aug-2013 1641 by 271	0.029	mg/l Batch: S35322	
Iron EPA 200.7	Prep: 29-Aug-2013 1641 by 271	3.1	mg/l Batch: S35322	
Nickel EPA 200.7	Prep: 29-Aug-2013 1641 by 271	15	mg/l Batch: S35322	
Zinc EPA 200.7	Prep: 29-Aug-2013 1641 by 271	6.1	mg/l Batch: S35322	

AIC No. 170152-2
 Sample Identification: Alum 8-19-13 1330

Analyte	Result	RL	Units	Qualifier
Total Cyanide SM 4500-CN C/E	Prep: 03-Sep-2013 0830 by 308 Analyzed: 04-Sep-2013 1036 by 308	0.01	mg/l Batch: W44765	H
Aluminum EPA 200.7	Prep: 29-Aug-2013 1641 by 271	1.9	mg/l Batch: S35322	
Arsenic EPA 200.7	Prep: 29-Aug-2013 1641 by 271	< 0.05	mg/l Batch: S35322	
Chromium EPA 200.7	Prep: 29-Aug-2013 1641 by 271	< 0.007	mg/l Batch: S35322	
Copper EPA 200.7	Prep: 29-Aug-2013 1641 by 271	< 0.006	mg/l Batch: S35322	
Iron EPA 200.7	Prep: 29-Aug-2013 1641 by 271	0.66	mg/l Batch: S35322	
Nickel EPA 200.7	Prep: 29-Aug-2013 1641 by 271	0.019	mg/l Batch: S35322	
Zinc EPA 200.7	Prep: 29-Aug-2013 1641 by 271	0.081	mg/l Batch: S35322	



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

September 5, 2013
 Control No. 170152
 Page 4 of 5

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	0.1 mg/l	92.8	85.0-115			V44765	03Sept13 0831 by 308	04Sept13 1004 by 308		
Aluminum	5 mg/l	103	85.0-115			S35322	29Aug13 1641 by 271	30Aug13 1331 by 305		
Arsenic	5 mg/l	107	85.0-115			S35322	29Aug13 1641 by 271	30Aug13 1331 by 305		
Chromium	0.5 mg/l	103	85.0-115			S35322	29Aug13 1641 by 271	30Aug13 1331 by 305		
Copper	0.5 mg/l	98.8	85.0-115			S35322	29Aug13 1641 by 271	30Aug13 1331 by 305		
Iron	5 mg/l	102	85.0-115			S35322	29Aug13 1641 by 271	30Aug13 1331 by 305		
Nickel	0.5 mg/l	105	85.0-115			S35322	29Aug13 1641 by 271	30Aug13 1851 by 305		
Zinc	0.5 mg/l	103	85.0-115			S35322	29Aug13 1641 by 271	30Aug13 1331 by 305		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample Amount	Spike Amount	%	Limits	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
Total Cyanide	170109-1	0.1 mg/l	84.3	75.0-125		V44765	03Sept13 0831 by 308	04Sept13 1007 by 308		
	170109-1	0.1 mg/l	88.1	75.0-125		W44765	03Sept13 0831 by 308	04Sept13 1009 by 308		
	Relative Percent Difference: 4.41									
Aluminum	170098-1	5 mg/l	109	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1335 by 305		
	170098-1	5 mg/l	109	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1339 by 305		
	Relative Percent Difference: 0.189									
Arsenic	170098-1	5 mg/l	108	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1335 by 305		
	170098-1	5 mg/l	109	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1339 by 305		
	Relative Percent Difference: 0.0762									
Chromium	170098-1	0.5 mg/l	101	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1335 by 305		
	170098-1	0.5 mg/l	102	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1339 by 305		
	Relative Percent Difference: 0.398									
Copper	170098-1	0.5 mg/l	98.3	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1335 by 305		
	170098-1	0.5 mg/l	97.9	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1339 by 305		
	Relative Percent Difference: 0.362									
Iron	170098-1	5 mg/l	99.6	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1335 by 305		
	170098-1	5 mg/l	99.2	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1339 by 305		
	Relative Percent Difference: 0.346									
Nickel	170098-1	0.5 mg/l	98.5	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1855 by 305		
	170098-1	0.5 mg/l	97.9	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1859 by 305		
	Relative Percent Difference: 0.660									
Zinc	170098-1	0.5 mg/l	98.7	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1335 by 305		
	170098-1	0.5 mg/l	99.6	75.0-125		S35322	29Aug13 1641 by 271	30Aug13 1339 by 305		
	Relative Percent Difference: 0.851									



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

LABORATORY BLANK RESULTS

Analyte	Result	RL	PQL	QC		Qual
				Sample	Preparation Date	
Total Cyanide	< 0.01 mg/l	0.01	0.01	W44765-1	03Sept13 0831 by 308	04Sept13 1002 by 308
Aluminum	< 0.04 mg/l	0.04	0.04	S35322-1	29Aug13 1641 by 271	30Aug13 1328 by 305
Arsenic	< 0.05 mg/l	0.05	0.05	S35322-1	29Aug13 1641 by 271	30Aug13 1328 by 305
Chromium	< 0.007 mg/l	0.007	0.007	S35322-1	29Aug13 1641 by 271	30Aug13 1328 by 305
Copper	< 0.006 mg/l	0.006	0.006	S35322-1	29Aug13 1641 by 271	30Aug13 1328 by 305
Iron	< 0.007 mg/l	0.007	0.007	S35322-1	29Aug13 1641 by 271	30Aug13 1847 by 305
Nickel	< 0.01 mg/l	0.01	0.01	S35322-1	29Aug13 1641 by 271	30Aug13 1328 by 305
Zinc	< 0.002 mg/l	0.002	0.002	S35322-1	29Aug13 1641 by 271	30Aug13 1328 by 305

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR465

Attn: Water Div/N/PDES Pretreatment

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

(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>
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C. FACILITY CONTACT: Mark Strozensky **TELEPHONE NUMBER:** (678) 896-8817

(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: March 2013 TO: August 2013</p>
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(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

40 CFR Part 465 -- Coil Coating Point Source Category

<u>PROCESS*</u>	<u>PROD'N RATE(S)</u> Total for Six Months	<u>PROD'N DAYS</u> Number of Operating Days
Subpart A Steel	N/P	_____
Subpart B Galv	14,778,878 ft ²	20
Subpart C Alum	113,275,299 ft ²	152
Subpart D Canmak	N/P	_____

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

<p>C. Number of Regular Employees at this Facility <u>42</u></p>	<p>D. [Reserved]</p>
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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.

(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	N/P			
Regulated: Galv Basis	300.18	2,847.45		20
Regulated: Alum Basis	300.18	2,847.45		152
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)		Galv: 3.17 Alum: 4.38	Galv: 12.79				Galv: 9.13 Alum: 12.18		Galv: 1.71 Alum: 2.31		
AMMC (mg/l)		<0.007 Galv and Alum	Galv: 0.029				Galv 6.10 Alum 0.81		<0.01 Galv and Alum		
AMAC (mg/l)		<0.007 Galv and Alum	Galv: 0.029				Alum 0.81		<0.01 Galv and Alum		

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

Sample Location FINAL EFFLUENT TANK _____

Sample Type (Grab or Composite) GRAB _____

Number of Samples and Frequency Collected 2 - SEMIANNUALLY _____

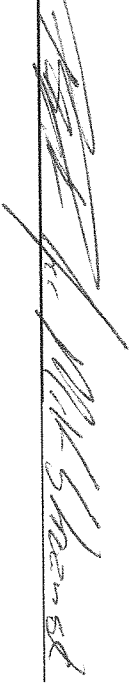
40CFR136 Preservation and Analytical Methods Use: Yes No

(6) CERTIFICATION

A. CHECK ONE: CYANIDE ANALYSIS ATTACHED 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.

Mark Strozensky
(Typed Name)



(Corporate Officer or authorized representative signature)

Date of Signature

9-3-13

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 _____.

(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 or 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(d)]**

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.

Mark Strozensky

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

Corporate Director of Continuous Improvement

OFFICIAL TITLE

DATE SIGNED