



ARKANSAS
Department of Environmental Quality

May 4, 2012

Leon Ryan
Vice President/General Manager
Southern Aluminum
P.O. Box 884
Magnolia, AR 71754

Re: Southern Aluminum (ARP001059) April 2012 Pretreatment Compliance Assurance Visit (City of Magnolia – AR0043613)

Dear Mr. Ryan,

On 4/3/12, a compliance assurance visit (CAV) was conducted by ADEQ Pretreatment personnel at your facility as required under 40 CFR 403.8(f)(2)(v). The CAV indicated Southern Aluminum (SA) is in compliance with the Federal Pretreatment Requirements in 40 CFR 403.12, but this office cannot state with confidence Southern Aluminum is in compliance with the Federal Metal Finishing Pretreatment limitations in 40 CFR 433.17 based on the below issues:

- A. During the CAV four (4) grab samples were taken at two (2) separate times from: 1) a combination of your Wash tank, its rinse and the “outside” Dip tank wastewaters and 2) the rinse tank’s wastewater alone;
- B. As discussed during the CAV, the combination of the grab samples were not representative of wastewater discharged to the City’s sewage treatment system on any given discharge day;
- C. SA’s batch discharge schedule (discussed during the CAV, see Attachment A-1):
 - 1) Rinse tank’s discharge is 2 (or 3?)/week;
 - 2) Wash tank’s discharge is once/3 or 4 months; and
 - 3) The Dip tank’s discharge is once/year or two;
- D. It is believed the worst case scenario would be when wash tank is discharged alone; and
- E. SA must show compliance with the Metal Finishing Pretreatment limitations in 40 CFR 433.17 during any discharge to the City.

ADEQ’s laboratory analysis (Attachment A-2) indicated your facility is in compliance with the Metal Finishing Standards in 40 CFR 433.17, but two (2) of the samples were of the combination of all three (3) sources mentioned above being released at the same time which is unrealistic and two (2) of the samples were from the rinse tank only.

Requirements and suggestions:

- 1) Southern Aluminum must sample and analyze its wastewater on the day it batch discharges wastewater from its wash tank and submit results to ADEQ;
 - a. It’s suggested to coincide that day with a batch discharge from the rinse tank as it is also regulated under 40 CFR 433.17;
 - i. “Semi-Annual” reports will no longer apply. “Discharge” reports/sampling results will be submitted after batch discharge of the Wash tank and when the Dip tank is batch discharged;
 - ii. ADEQ’s sampling of just the rinse water discharge indicated compliance with the Metal Finishing limitations in 40 CFR 433.17. SA shall grab four (4) more

samples of the rinse water and submit analytical data to ADEQ. If those samples show compliance, SA may discontinue sampling/analysis of just the rinse water batch discharges which are two (2) or three (3) times per week;

- 2) As discussed during the CAV, the sampling point should be reconfigured to elevate the discharge pipe (from the wash and its rinse tank) further above the City's outlet pipe to avoid potential contamination or dilution from the standing water in the bottom of the sampling sump.

If there is a dispute with the above requirements or suggestion, please respond within thirty (30) days from the date on this correspondence.

Please keep this and all Pretreatment correspondence on file for future reference. All Pretreatment records are required to be kept on-site for a minimum of three (3) years per 40 CFR 403.12(o)(2).

If there are further questions, please feel free to contact this office at (501) 682-0625 or electronically at gilliam@adeq.state.ar.us.

Sincerely,



Allen Gilliam
ADEQ State Pretreatment Coordinator

Attachments: "Pretreatment Industrial Inspection" (CAV); Southern Aluminum's flow schematic and ADEQ's lab results for the 40 CFR 433 metals

cc: Russell Thomas/City of Magnolia Wastewater Manager/P.O. Box 666/Magnolia, AR 71754
Bernie Finch/Finch Environmental/9 Heritage Park Circle/N. Little Rock, AR 72116

ADEQ Pretreatment Compliance Assurance Visit

Facility Information

Facility Name: Southern Aluminum		Site Address: 5 Hwy. 82 West, Magnolia, AR 71753	
Signatory Authority (Name & Title): Leon Ryan – Vice President and General Manager			
Phone: 870.234.8660		Mailing Address (if different): P.O. Box 884, Magnolia, AR 71754	
Fax: 870.234.7351		Corporate Owner Name and address (if applicable): Mark Taylor	
Address: Same			
Phone: Same			
Contact Person (Name & Title): Leon Ryan or		Phone: 870.234.8660	
e-mail: lryan@southernaluminum.com		Fax:	
Facility Tracking #ARP001059 (AFIN# 1400727)		Corporate CEO: Mark Taylor	
POTW (City) IU discharges to: Magnolia		Last Inspection Date: N/A	
Industrial Classification: Metal Finishing under 40 CFR 433.17 (PSNS)		POTW's NPDES# AR0043613	
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 433.17		<input checked="" type="checkbox"/> Categorical <input type="checkbox"/> Significant	

Table of Contents

I. Summary of Inspection	Page 2 of 10
A. Inspection Objectives	
B. Inspection Analysis	
II. Pre-Inspection Meeting	Pages 3& 4 of 10
A. General Information	
B. Facility Permits	
C. Additional Comments	
III. Attachments “Yes” indicates item exists at the facility and attachments will be included or referenced. “No” indicates item does not exist at the facility and attachments aren't necessary.	
A. Industrial Processes	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 5 of 10
B. Pollution Prevention Activities	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 6 of 10
C. Pretreatment System (no pretreatment system currently)	yes <input type="checkbox"/> no <input type="checkbox"/> Page 7 of 10
D. Chemical Storage	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 8 of 10
E. Spill/Slug Control Plan	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 9 of 10
F. Self-Monitoring/TOMP	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Page 10 of 10
Comments :	
Inspector's Name (Print): Allen Gilliam	Signature: <i>Allen Gilliam</i>
IU Rep's Name (Print):	Signature: <i>Leon Ryan</i>
Date and Time Inspection Ended: 4/3/12 @ 2:30 pm	

I. Summary of Inspection			
A. Inspection and Objective (Complete Before Inspection)			
<input type="checkbox"/> Permit Renewal	<input checked="" type="checkbox"/> Bi-Annual	<input type="checkbox"/> Spill/Slug	<input type="checkbox"/> Unscheduled
<input type="checkbox"/> New Construction	<input type="checkbox"/> Noncompliance	<input type="checkbox"/> Follow-up	<input type="checkbox"/> Complaint
Inspection Objective(s): Assure compliance with the Federal Pretreatment Regulations; specifically the Metal Finishing Standards in 40 CFR 433.17.			
Checklist of items to be reviewed and/or visually inspected:			
<input checked="" type="checkbox"/> Pre-inspection Meeting	<input type="checkbox"/> Permit Conditions	<input checked="" type="checkbox"/> Safety Concerns	
<input checked="" type="checkbox"/> Process Inspection	<input type="checkbox"/> Pretreatment System	<input checked="" type="checkbox"/> TOMP (submitted 7/5/11; approved 8/2/11)	
<input checked="" type="checkbox"/> Chemical Storage	<input checked="" type="checkbox"/> Discharge point(s)	<input checked="" type="checkbox"/> Spills/Slug Control Plan	
<input checked="" type="checkbox"/> Records Review	<input type="checkbox"/> RCRA information	<input checked="" type="checkbox"/> Process/Flow/Pretreatment Schematics	
<input checked="" type="checkbox"/> IU sampling procedures	<input type="checkbox"/> Flow/pH Meter(s)	<input type="checkbox"/> Calibration Records	
<input type="checkbox"/> MSDS Inventory List	<input type="checkbox"/> New MSDS	<input type="checkbox"/>	
Comments: The facility currently has no pretreatment system, but is currently following a compliance schedule to determine how to come in to compliance with the Metal Finishing Zn limitations.			
B. Inspection Analysis			
Were there any deficiencies/violations identified and noted during the inspection? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
Provide a brief narrative of deficiencies/violations or other concerns in the following areas:			
Records Review: Adequate			
Process Area(s): Clean and orderly			
Pretreatment System: N/A			
Self-Monitoring Procedures: A "representative" sample could not be ascertained as their two (2) process baths and one (1) rinse tank are discharged at different schedules. The worst case scenario is when the facility discharges their phosphatizing tank ~ once/3 or 4 months. The rinse tank is discharged 2 or 3 times/week while the outside, but covered phosphatizing "dip tank" is only discharged once every year or two.			
Spill/Slug Control Plan: It was determined during the site visit the potential for a slug discharge was negligible.			
Sampling Point: Sampling point should be reconfigured to capture flows from the interior phosphatizing bath/rinse as its outfall is almost at the same level as the discharge pipe to the City and could be easily contaminated (or diluted) with the wastewater that remains stagnant in the circular sampling sump. The discharge from the separate outside phosphate "dip" tank' flowline is below the grade of the discharge pipe to the City and has to be sampled at the bottom of the dip tank which is batch discharged ~ once/year or two.			
Chemical Storage:			

Attachment B: Pollution Prevention (P2) / Recycling Activities

Does the facility have a written P2 Plan? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Environmental Management System in place? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> This inspectors saw very few opportunities.	
ISO Certified? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Written Standard Operating Procedures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: Every department has a written SOP.	
Preventative Maintenance Program Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> (hydraulic systems, valves, pumps, etc)	
Explain: "continuous"	
Water Reuse: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Cost Accounting to Track Savings: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Inventory Control / "Green Purchasing": Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> (lean manufacturing/"env. friendly purchasing", etc)	
Explain: Type of end-product and customer demands does not lend the facility to this practice.	
Employee Training: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: They cross-train continuously as required by the end products' "mix".	
Spent Solvent Reclamation? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Recycle Paper, Aluminum, Boxes, and Pallets? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Explain: All the above and plastics.	
Recycle Waste Oil, Solvents, and Lubricants? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
Explain:	
Other Activities:	
P2 Equipment/Practices in use:	
<input type="checkbox"/> Overflow Alarms	<input type="checkbox"/> Aqueous Cleaning Solutions
<input type="checkbox"/> Fog Spray Rinsing	<input type="checkbox"/> Countercurrent Rinsing
<input type="checkbox"/> Dragout Collection Trays	<input type="checkbox"/> Seal-Less Pumps
<input checked="" type="checkbox"/> Air knives to Blow Parts Dry	<input type="checkbox"/> Secondary Containment of Process Solutions
<input type="checkbox"/> Aqueous Paint Stripping Solutions	<input type="checkbox"/> Bead Blasting to Remove Paint
<input type="checkbox"/> Water Soluble Cutting Fluids	<input checked="" type="checkbox"/> Recycle Overspray (<i>powder coat paint</i>)
<input type="checkbox"/> In-Process Recycle (Ion Exchange, Reverse Osmosis)	<input type="checkbox"/> Conductivity Meters
<input type="checkbox"/> Dead Rinse Tanks	<input type="checkbox"/> Bath / Rinse Filtration

Attachment F: Self-Monitoring & 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. As mentioned in Section(s) "B. Inspection Analysis" and above "Visual Inspection of Discharge Lines/Points", representative samples of regulated wastewater is difficult to procure because of the grade level of the PVC pipe from the interior regulated processes to the City's outlet and the below grade level of the PVC pipe from the outside dip tank. It would behoove the facility to reconfigure the outlet PVC pipe from the inside regulated process wash and rinse discharge to be well above the grade level of the City's outlet.

The samples taken during this site visit were collected in a distilled water washed plastic measuring container in a ratio of 3/4s interior wash/rinse wastewater and 1/4 from the outside dip tank contents. This inspector does not believe the samples were representative of the worst case discharges from the facility. Samples from the interior wash/rinse tanks should have been taken separately.

Where is the sample point located?

<input checked="" type="checkbox"/> End of Process	<input type="checkbox"/> Pretreatment Effluent	<input type="checkbox"/> Total Regulated Flow
<input type="checkbox"/> Combined Flow	<input type="checkbox"/> Metered Flow	<input type="checkbox"/> Flow Actuator
<input type="checkbox"/> Private Manhole	<input type="checkbox"/> Utility Manhole	<input checked="" type="checkbox"/> Advance Notice Required
<input type="checkbox"/> Safety Hazards Identified	<input type="checkbox"/>	<input type="checkbox"/>

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: Environmental Services Co., 13715 W. Markham, LR 72211

Automatic Sampler or Manual

IU Self-Monitoring Results reviewed: *(those submitted to ADEQ)* 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 *(not submitted)*

Were correct Sample Types Collected Yes No ???

Dates and times of Sample Collection Recorded? Yes No N/A

Were Samples preserved correctly (refer to 40CFR Part 136) Yes No ???

Were Self Monitoring records on file for past 3 years? Yes No N/A *(facility has not been reporting for more than 3 years.)*

List the parameters the facility monitors and the frequency:

<input checked="" type="checkbox"/> Cd(t)	<input checked="" type="checkbox"/> Cu(t)	<input checked="" type="checkbox"/> Cr(t)	<input checked="" type="checkbox"/> Ni(t)	<input checked="" type="checkbox"/> Pb(t)
<input checked="" type="checkbox"/> Ag(t)	<input checked="" type="checkbox"/> Zn(t)	<input checked="" type="checkbox"/> pH	<input checked="" type="checkbox"/> CN(t)	<input type="checkbox"/> CN(a-c)
<input type="checkbox"/> TTO-Vol	<input type="checkbox"/> TTO-B/N	<input type="checkbox"/> TTO-A.E.	<input type="checkbox"/> TTO-Pest	<input type="checkbox"/> Cr(hex)
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433 (TOMP approved on 8/2/11)

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

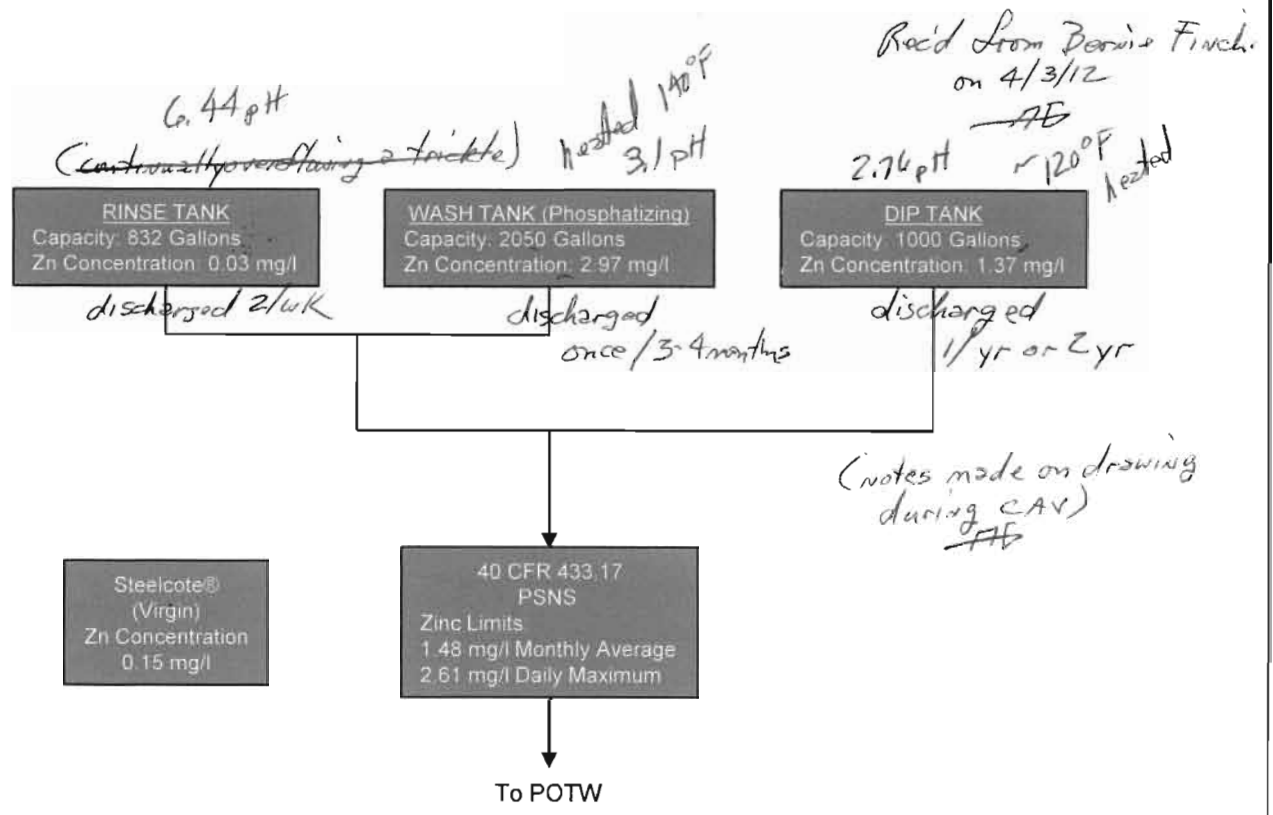
List the date of the last revision to the TOMP: 7/5/11

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: It was observed during this site visit the facility that no large quantities of toxic organics were used or on site.

**Southern Aluminum
Process Schematic of Water Flow
With Tank Capacity and Zinc Concentration**



Past Analyses for Zinc	
Sample Date	Zn Concentration
11.24.2009	5.02 mg/l
10.21.2010	6.38 mg/l
12.15.2010	0.96 mg/l
02.21.2011	0.55 mg/l
11.18.2011	2.07 mg/l
01.27.2012	2.48 mg/l

Schematic of Water Flow and Zinc Concentration
Southern Aluminum
Sample Taken: 02.29.2012

General Notes:
Rinse Tank Overflows Daily
Rinse Tank Dumped Wednesdays And Fridays
Wash Tank and Dip Tank Dumped Quarterly

Attachment A-2



5301 Northshore Drive
North Little Rock, AR 72118
Telephone: 501-682-0744

Client Report For: Southern Aluminum 2012 1028-1031
Attention:
Client Address:

Report Date: April 26, 2012
LAB ID: AR12APR06-01
Comment:

Approved By: Allen Gillman

Date: April 26, 2012

Arkansas Department of Environmental Quality
 5301 Northshore Drive
 North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr
 Ruehr@adeq.state.ar.us
 501-682-0955

Client: Special Samples

Client Sample ID: Southern Alum # 1 Combo (wash, rinse & dip)

Lab ID: 2012-1028

Collection Date: 4/3/2012 10:25:00 AM

Matrix: Water

Analyses

Total Metals by EPA 200.8

EPA 200.8

Batch: 12041603 Run: 1

	<u>Result</u>	<u>Reporting Limit</u>	<u>MDL</u>	<u>Qual</u>	<u>Unit</u>
Aluminum	57600	200	20		ug/L
Antimony	<100	100	5		ug/L
Arsenic	<10	10	0.5		ug/L
Barium	120	100	2.0		ug/L
Beryllium	<5	5	0.1		ug/L
Boron	385	250	5.0		ug/L
Cadmium	<10	10	0.3		ug/L
Calcium	36.9	0.4	0.04		mg/L
Chromium	11.1	10	0.3		ug/L
Cobalt	<10	10	0.5		ug/L
Copper	17.5	10	0.5		ug/L
Iron	9190	200	10.0		ug/L
Lead	<10	10	0.1		ug/L
Magnesium	17.2	1	0.1		mg/L
Manganese	344	10	0.2		ug/L
Nickel	<25	25	0.5		ug/L
Potassium	20.1	10	0.05		mg/L
Selenium	<20	20	0.5		ug/L
Silver	<50	50	1.0		ug/L
Sodium	2380	0.4	0.02		mg/L
Thallium	<25	25	0.05		ug/L
Vanadium	<25	25	1.0		ug/L
Zinc	1200	30	2.0		ug/L

Dilution Factor

1

Analyzed By

Joe Semberski

Analysis Date/Time

Apr 13 2012 10:07AM

Prep By

Prep Date/Time

Arkansas Department of Environmental Quality
 5301 Northshore Drive
 North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr
 Ruehr@adeq.state.ar.us
 501-682-0955

Client: Special Samples **Client Sample ID:** Southern Alum R#1 (Rinse only)
Lab ID: 2012-1029 **Collection Date:** 4/3/2012 10:10:00 AM
Matrix: Water

Analyses

Total Metals by EPA 200.8

EPA 200.8

Batch: 12041602 Run: 1

	<u>Result</u>	<u>Reporting Limit</u>	<u>MDL</u>	<u>Qual</u>	<u>Unit</u>
Aluminum	4560	20	20		ug/L
Antimony	<10	10	5		ug/L
Arsenic	<1	1	0.5		ug/L
Barium	388	10	2.0		ug/L
Beryllium	<0.5	0.5	0.1		ug/L
Boron	<25	25	5.0		ug/L
Cadmium	<1	1	0.3		ug/L
Calcium	17.9	0.04	0.04		mg/L
Chromium	2.58	1	0.3		ug/L
Cobalt	<1	1	0.5		ug/L
Copper	62.9	1	0.5		ug/L
Iron	1170	20	10.0		ug/L
Lead	16.3	1	0.1		ug/L
Magnesium	1.45	0.1	0.1		mg/L
Manganese	45.3	1	0.2		ug/L
Nickel	21.6	2.5	0.5		ug/L
Potassium	2.79	1	0.05		mg/L
Selenium	<2	2	0.5		ug/L
Silver	<5	5	1.0		ug/L
Sodium	22.3	0.04	0.02		mg/L
Thallium	<2.5	2.5	0.05		ug/L
Vanadium	<2.5	2.5	1.0		ug/L
Zinc	112	3	2.0		ug/L

Dilution Factor 1
 Analyzed By Joe Semberski
 Analysis Date/Time Apr 12 2012 4:36PM
 Prep By
 Prep Date/Time

Arkansas Department of Environmental Quality
 5301 Northshore Drive
 North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr
 Ruehr@adeq.state.ar.us
 501-682-0955

Client: Special Samples **Client Sample ID:** Southern Alum # 2 Rinse (only)
Lab ID: 2012-1030 **Collection Date:** 4/3/2012 2:17:00 PM
Matrix: Water

Analyses

Total Metals by EPA 200.8

EPA 200.8

Batch: 12041602 Run: 1

	Result	Reporting Limit	MDL	Qual	Unit
Aluminum	904	20	20		ug/L
Antimony	<10	10	5		ug/L
Arsenic	<1	1	0.5		ug/L
Barium	29.2	10	2.0		ug/L
Beryllium	<0.5	0.5	0.1		ug/L
Boron	<25	25	5.0		ug/L
Cadmium	<1	1	0.3		ug/L
Calcium	16.8	0.04	0.04		mg/L
Chromium	<1	1	0.3		ug/L
Cobalt	<1	1	0.5		ug/L
Copper	8.04	1	0.5		ug/L
Iron	315	20	10.0		ug/L
Lead	<1	1	0.1		ug/L
Magnesium	1.32	0.1	0.1		mg/L
Manganese	43.2	1	0.2		ug/L
Nickel	<2.5	2.5	0.5		ug/L
Potassium	2.69	1	0.05		mg/L
Selenium	<2	2	0.5		ug/L
Silver	<5	5	1.0		ug/L
Sodium	24.4	0.04	0.02		mg/L
Thallium	<2.5	2.5	0.05		ug/L
Vanadium	<2.5	2.5	1.0		ug/L
Zinc	52.2	3	2.0		ug/L
Dilution Factor	1				
Analyzed By	Joe Semberski				
Analysis Date/Time	Apr 12 2012 5:09PM				
Prep By					
Prep Date/Time					

Arkansas Department of Environmental Quality
 5301 Northshore Drive
 North Little Rock, AR 72118

Laboratory Contact: Jeff Ruehr
 Ruehr@adeq.state.ar.us
 501-682-0955

Client: Special Samples
Client Sample ID: Southern Alum # 2 Combo (wash, rinse & dip)
Lab ID: 2012-1031
Collection Date: 4/3/2012 2:20:00 PM
Matrix: Water

Analyses

Total Metals by EPA 200.8

EPA 200.8

Batch: 12041602 Run: 1

	Result	Reporting Limit	MDL	Qual	Unit
Aluminum	72700	20	20		ug/L
Antimony	<10	10	5		ug/L
Arsenic	4.93	1	0.5		ug/L
Barium	46.6	10	2.0		ug/L
Beryllium	<0.5	0.5	0.1		ug/L
Boron	348	25	5.0		ug/L
Cadmium	7.17	1	0.3		ug/L
Calcium	30.9	0.04	0.04		mg/L
Chromium	6.56	1	0.3		ug/L
Cobalt	2.29	1	0.5		ug/L
Copper	15.0	1	0.5		ug/L
Iron	8200	20	10.0		ug/L
Lead	3.02	1	0.1		ug/L
Magnesium	23.1	0.1	0.1		mg/L
Manganese	340	1	0.2		ug/L
Nickel	20.6	2.5	0.5		ug/L
Potassium	19.0	1	0.05		mg/L
Selenium	<2	2	0.5		ug/L
Silver	<5	5	1.0		ug/L
Sodium	2930	0.04	0.02		mg/L
Thallium	<2.5	2.5	0.05		ug/L
Vanadium	<2.5	2.5	1.0		ug/L
Zinc	625	3	2.0		ug/L
Dilution Factor	1				
Analyzed By	Joe Semberski				
Analysis Date/Time	Apr 12 2012 5:14PM				
Prep By					
Prep Date/Time					