

## Wilson, Tabatha

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**From:** Gilliam, Allen  
**Sent:** Friday, August 02, 2013 3:03 PM  
**To:** Colleen Tuggle (ctuggle@southernaluminum.com); Leon Ryan (lryan@southernaluminum.com)  
**Cc:** Fuller, Kim; Wilson, Tabatha; magnolia russell thomas; Bernie K. Finch; Uyeda, Craig; Anderson, Alan  
**Subject:** AR0043613\_Southern Aluminums ARP001059 July 2013 periodic compliance report and ADEQ SNC reply\_20130802  
**Attachments:** Southern Aluminum's July 2013 Report.pdf

Leon,

Southern Aluminum's (SA) July 2013 periodic compliance report was received on 7/29, reviewed and deemed non-compliant with the Federal Pretreatment reporting requirements in 40 CFR 403.12 and significantly non-compliant (SNC) with the Metal Finishing standards in 40 CFR 433.17.

1. SA's report included a sample collected on 4/17/13 which exceeded the Metal Finishing daily maximum and monthly average limits for zinc at 4.46 mg/l (CFR 433 "maximum for any 1 day is 2.61 mg/l" and the "monthly avg. shall not exceed 1.48 mg/l).
2. SA's report also included a sample collected on 6/19/13 which exceeded the Metal Finishing monthly average limits at 2.0 mg/l.

According to 40 CFR 403.8(f)(2)(vi), "...[Southern Aluminum]...is in significant noncompliance [SNC] if its violation meets one or more of the following criteria:

(A) Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement..."

SA exceeded its Metal Finishing monthly average limit more than 66% of the time during a 6-month period and meets EPA's SNC criteria above.

Other reporting requirements SA is in non-compliance with:

403.12 (g)(2), "*Monitoring and analysis to demonstrate continued compliance.* If sampling performed by [Southern Aluminum] indicates a violation, [SA] shall notify [ADEQ] within 24 hours of becoming aware of the violation. SA shall also repeat the sampling and analysis and submit the results of the repeat analysis to [ADEQ] within 30 days after becoming aware of the violation.

ADEQ has no record of communications of the zinc exceedances in the Metal Finishing standards and there's no record SA repeated the analysis and submit the results within 30 days.

This office was under the impression the batch discharge frequency from the "work" tanks and the rinse tank had been established last year to rectify the zinc excursions. Was there not a standard operating procedure established for this?

Please respond within thirty (30) days from the date on this correspondence with corrective actions.

Allen Gilliam

ADEQ State Pretreatment Coordinator  
501.682.0625

Ec: Craig Uyeda, Enforcement Branch Manager  
Alan Anderson, Enforcement Analyst  
Russell Thomas, Magnolia Wastewater Superintendent  
Bernie Finch, Finch Environmental, Consultant Engineer to Southern Aluminum

E/NPDES/NPDES/Pretreatment/Reports

**Finch Environmental, PLC**

9 Heritage Park Circle  
North Little Rock, Arkansas 72116-8528

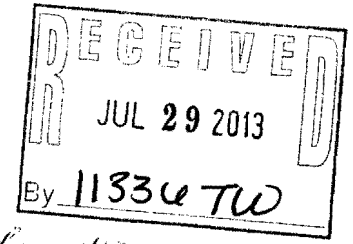
Municipal and Industrial  
NPDES Storm Water  
Pollution Prevention Plans  
Control Plans Environmental Permitting  
Reporting Hazardous Waste  
Pretreatment

AUNT 1  
AG

7/23/2013

Mr. Allen Gilliam  
Pretreatment Coordinator  
ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118

*periodic compliance  
report  
Facility is in non-compliance  
Further action necessary*



Re: Southern Aluminum Company, Inc., Pretreatment Tracking Number ARP001059

Dear Mr. Gilliam,

Please accept the attached "Periodic Report" form for the referenced facility. On April 17, 2013 a discharge to the City of Magnolia sanitary sewer system occurred after notifying the City of Magnolia five days previous. Concurrent to the discharge, a sampling effort was made to analyze pollutants limited and codified at 40 CFR 433.17. With the exception of Zinc (total) the discharge of all pollutants/parameters was in compliance with applicable regulations.

Subsequent to the April 17, 2013 discharge event another discharge was planned for June 19, 2013 to determine the minimum frequency necessary to comply with 40 CFR 433.17 limitations, particularly zinc (total). The sampling effort on this date yielded a concentration of zinc less than 50% of the zinc concentration revealed in the April 17, 2013 discharge. While still non compliant, the concentration for zinc (total) was 2.00 mg/l. This concentration represents the monthly average and the daily maximum since only one analysis was made during the calendar month. This discharge was compliant with the daily maximum limitation for zinc but non-compliant with the monthly average concentration limit.

The attached periodic report documents these analyses conducted during the first six calendar months of 2013. The next batch discharge from the facility is to occur on July 29, 2013 (approximately one month since last discharge) with analyses conducted to assess compliance with 40 CFR 433.17 metals and cyanide. We are hopeful that this frequency will be sufficient to attain regular compliance.

Also included with this submittal is the laboratory analytical results and chain of custody forms for each discharge.

Please accept this submittal and contact me with questions.

Thank you.

Sincerely,

B → K → F →

Bernie K. Finch  
Finch Environmental, PLC



Leon Ryan  
Southern Aluminum Company, Inc.

Attachments

Cc Russell Thomas, City of Magnolia

**SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433**

Use of this form is not an EPA/ADEQ requirement.

Attn: Water Div/NPDES Pretreatment

**(1) IDENTIFYING INFORMATION**

**A. LEGAL NAME & MAILING ADDRESS**

Southern Aluminum  
P.O. Box 884  
Magnolia, AR 71754

**B. FACILITY & LOCATION ADDRESS**

Southern Aluminum  
5 Highway 82 West  
Magnolia, AR 71753

**C. FACILITY CONTACT:** Colleen Tuggle      **TELEPHONE NUMBER:** 870.234.8660      **e-mail:** tuggle@southernaluminum.com

**(2) REPORTING PERIOD--FISCAL YEAR 2013 (Both Semi-Annual Reports must cover Fiscal Year)**

**A. MONTHS WHICH REPORTS ARE DUE**

\*This is a periodic report.

**B. PERIODS COVERED BY THIS REPORT**

**FROM:** April 17, 2013      **TO:** April 17, 2013  
**FROM:** June 19, 2013      **TO:** June 19, 2013

**(3) DESCRIPTION OF OPERATION**

**A. REGULATED PROCESSES**

**CORE PROCESS(ES)**

CHECK EACH APPLICABLE BLOCK

- Electroplating
- Electroless Plating
- Anodizing
- Coating
- Chemical Etching and Milling
- Printed Circuit Board Manufacture

**ANCILLARY PROCESS(ES)\***

LIST BELOW EACH PROCESS USED IN THE FACILITY

- Coating \_\_\_\_\_
- Cleaning \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

\*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

**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.

None .

**C. Number of Regular Employees at this Facility** 135  
\_\_\_\_\_ 135 \_\_\_\_\_

**D. [Reserved]**

**(4) FLOW MEASUREMENT****INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY**

Process	Average	Maximum	Type of
Regulated (Core & Ancillary)	See note below	See note below	2882
Regulated (Cyanide)	0	0	N/A
' 403.6(e) Unregulated*	0	0	N/A
' 403.6(e) Dilute	0	0	N/A
Cooling Water**	0	0	N/A
Sanitary**	0	0	N/A
Total Flow to POTW	See note below	See note below	2882

\*\*\*"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

\*\*Indicate if these Streams commingle with Regulated Streams BEFORE treatment

**(5) MEASUREMENT OF POLLUTANTS**

A. TYPE OF TREATMENT SYSTEM

B. COMMENTS ON TREATMENT SYSTEM

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES--CORE & ANCILLARY--(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(mg/l)	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*
Max for 1 day	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Monthly Ave	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	0.010	0.021	0.157	0.079	0.074	0.0005	4.46	0.01	N/A
Ave Measured	0.010	0.021	0.157	0.079	0.074	0.0005	4.46	0.01	--

Sample Location Flow-weighted composite samples taken of wash tank and rinse tank contributions commingled prior to discharge to municipal collection system. Dip tank did not discharge during the period 01-01-2013 through 06-30-2013.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency One (1) sample collected 04-17-2013

40 CFR 136 Preservation and Analytical Methods Use:  Yes  No

Indicate Combined Wastestream Factor if Dilution Streams Exist w/Regulated Streams N/A

**(6) CERTIFICATION**

A. Required under 40 CFR 403.12(g)

**(4) FLOW MEASUREMENT**INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN *GALLONS PER DAY*

Process	Average	Maximum	Type of
Regulated (Core & Ancillary)	See note below	See note below	2882
Regulated (Cyanide)	0	0	N/A
' 403.6(e) Unregulated*	0	0	N/A
' 403.6(e) Dilute	0	0	N/A
Cooling Water**	0	0	N/A
Sanitary**	0	0	N/A
<b>Total Flow to POTW</b>	See note below	See note below	<b>2882</b>

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Max for 1 day	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Monthly Ave	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	0.021	0.028	0.033	0.127	0.035	0.029	2.00	0.01	N/A
Ave Measured	0.021	0.028	0.033	0.127	0.035	0.029	2.00	0.01	--

Sample Location Flow-weighted composite samples taken of wash tank and rinse tank contributions commingled prior to discharge to municipal collection system. Dip tank did not discharge during the period 01-01-2013 through 06-30-2013.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency One (1) sample collected 06-19-2013


40 CFR 136 Preservation and Analytical Methods Use:  Yes  No

Indicate Combined Wastestream Factor if Dilution Streams Exist w/Regulated Streams N/A

**(6) CERTIFICATION**

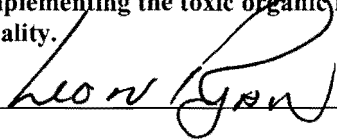
A. Required under 40 CFR 403.12(g)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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.

Leon M. Ryan   
(Typed Name)  
Vice President/General Manager  
(Corporate Officer or authorized representative)

B. CHECK ONE:  '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED  '433.12(a) TTO CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last semi-annual compliance report. I further certify that this facility is implementing the toxic organic management plan submitted to Arkansas Department of Environmental Quality.

Leon M. Ryan   
(Typed Name)  
Vice President, General Manager  
(Corporate Officer or authorized representative)  
Date of Signature 7-23-13

Intentionally left blank



*'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: None

**(8) GENERAL COMMENTS**

**Flow (Discharge)**

Southern Aluminum batch discharges to the City of Magnolia POTW in the following manner:

**Rinse Tank (Capacity: 832 gallons)**

**Wash Tank (Capacity: 2050 gallons)**

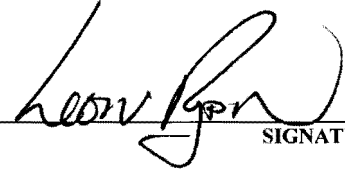
**Dip Tank (Capacity: 1000 gallons)\***

\* Dip Tank did not discharge during the period beginning 01-01-2013 and ending 06-30-2013

**(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 document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate 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.

Leon M. Ryan  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

Vice President/General Manager  
OFFICIAL TITLE

7-23-13  
DATE SIGNED

# Environmental Services Company, Inc.

Corporate Office  
 13715 West Markham  
 Little Rock, AR 72211  
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch  
 1107 Century Avenue  
 Springdale, AR 72762  
 Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1304010591  
 Customer Name : SOUTHERN ALUMINUM CO., INC.  
 Customer Number : 2754  
 Report Date : 05/02/13

Sample Date : 04/17/13  
 Sample Time : 1300  
 Sample Type : GRAB WATER  
 Sample From :

Collected By: COLLEEN TUGGLE  
 Delivery By : UPS  
 Work Order :  
 Purchase Order :

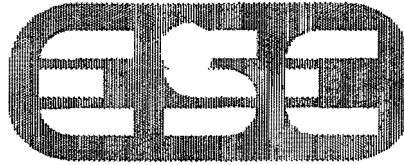
<u>Laboratory Analysis</u>							<u>Quality Assurance</u>	
<u>Analysis</u>			<u>Result</u>	<u>Notes</u>	<u>Quantity</u>	<u>Method</u>	<u>Precision</u>	<u>Accuracy</u>
<u>Date</u>	<u>Time</u>	<u>By</u>					<u>Parameter</u>	<u>% RPD</u>
04/30	1700	NTR	Cyanide Total (as CN)	< 0.0100 mg/L		SM 18th 4500-CN E	2.54	101.3
04/17	1259	JF	pH	7.3 S.U.		SM 18 4500 H+B		
04/24	1050	RAH	Chromium	21.00 ug/L		EPA 200.8	1.05	96.4
04/24	1050	RAH	Nickel	74.00 ug/L		EPA 200.8	5.38	89.5
04/24	1050	RAH	Copper	157.00 ug/L		EPA 200.8	2.43	87.6
04/24	1050	RAH	Zinc	4458.00 ug/L		EPA 200.8	8.59	90.4
04/24	1050	RAH	Silver	< 0.50 ug/L		EPA 200.8	3.60	82.0
04/24	1050	RAH	Cadmium	< 0.10 ug/L		EPA 200.8	2.56	78.0
04/24	1050	RAH	Lead	79.00 ug/L		EPA 200.8	6.15	83.8

\* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Neil Rye  
 Environmental Services Co., Inc.

Environmental Services Company, Inc.  
 Corporate Office  
 13715 West Markham P.O. Box 55146  
 Little Rock, AR 72211 Little Rock, AR 72215  
 website: www.esclabs.com



Environmental Services Company, Inc.  
 Northwest Branch  
 1107 Century  
 Springdale, AR 72764

Phone: 501-221-2565 Fax: 501-221-1341

### CHAIN OF CUSTODY

Phone 479-750-1170 Fax: 479-750-1172

Client Information						Project Information					Requested Parameters										
Company Name: Southern Aluminum Co., Inc.						Permit/Project #:					Cyanide(9) Metals (See Comments)										
Address: #5 Hwy 82 West Magnolia, AR 71753						Purchase Order #:															
Telephone: 800-221-0408						Work Order #:															
Fax: 870-234-4665						Sampler Name(s): Colleen Tuggle															
Contact: Ms. Colleen Tuggle						and Signature(s): <i>Colleen Tuggle</i>															
ESC Client Number: 2754																					
Sample Identification		Sample Collection				Sample Containers															
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#												
	1304010591	4-17-13	1:00 pm	Grab	Water	Plastic	1 Liter	NaOH+Ascorbic	1	X											
		4-17-13	1:00 pm	Grab	Water	Plastic	8 oz	HNO3 *	1	X											
Relinquished By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Custody Seals:													
<i>Colleen Tuggle</i>		4-17-13	1:15 pm	<i>Cindy Strauss</i>		4-18-13	1045	Used? <input type="checkbox"/> Intact? <input type="checkbox"/>													
Relinquished By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Turnaround:													
<i>Cindy Strauss</i>		4-18-13	1350	<i>Richard Hall</i>		4-18-13	1330	Regular <input checked="" type="checkbox"/> Special <input type="checkbox"/>													
Relinquished By: (Signature and Printed Name)		Date	Time	Received for Lab By: (Signature and Printed Name)		Date	Time	Were samples properly preserved:													
				<i>Richard Hall</i>		4-18-13	1330	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>													
All samples cooled to ≤ 6 deg C with ice.						Flow Data		Field Test		Time		Analyst		Result		Result		Units			
Comments: Cd(48.PS), Cr(24.PS), Cu(29.PS), Pb(82.PS), Ni(28.PS), Ag(47.PS), Zn(30.PS)						Analyst:		pH:		12:59		J. Falter		7.3							
						Time:		Reading:													
						Units:		Chlorinated? Y N		Fecal Start:											
* Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.																		This Document is Page 1 of 1			

Directions

Environmental Services Company, Inc.

Corporate Office  
13715 West Markham  
Little Rock, AR 72211

Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch  
1107 Century Avenue  
Springdale, AR 72762

Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1306010513  
Customer Name : SOUTHERN ALUMINUM CO., INC.  
Customer Number : 2754  
Report Date : 07/09/13

Sample Date : 06/19/13  
Sample Time : 1300  
Sample Type : GRAB WATER  
Sample From :

Collected By: JEFF FARRAR  
Delivery By : UPS  
Work Order :  
Purchase Order :

Laboratory Analysis

Quality Assurance

Analysis			Parameter	Result	Notes	Quantity	Method	Precision	Accuracy
Date	Time	By						% RPD	% Recovery
06/25	1100	NTR	Cyanide Total (as CN)	< 0.0100 mg/L			SM 18th 4500-CN E	1.44	96.7
06/19	1300	JF	pH	7.1 S.U.			SM 18 4500 H+B		
06/28	1307	RAH	Chromium	28.10 ug/L			EPA 200.8	1.83	96.1 *
06/28	1307	RAH	Nickel	34.60 ug/L			EPA 200.8	1.64	93.9 *
06/28	1307	RAH	Copper	32.50 ug/L			EPA 200.8	0.30	80.5 *
06/28	1307	RAH	Zinc	2004.00 ug/L			EPA 200.8	6.17	93.9 *
06/28	1307	RAH	Silver	29.30 ug/L			EPA 200.8	2.17	97.9 *
06/28	1307	RAH	Cadmium	21.30 ug/L			EPA 200.8	4.47	98.3 *
06/28	1307	RAH	Lead	127.20 ug/L			EPA 200.8	0.49	82.2 *

\* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature

M.D. Ryer  
Environmental Services Co., Inc.

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 Corporate Office  
 13715 West Markham P.O. Box 55146  
 Little Rock, AR 72211 Little Rock, AR 72215  
 website: [www.esclabs.com](http://www.esclabs.com)



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 1107 Century  
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Phone: 501-221-2565 Fax: 501-221-1341

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Phone 479-750-1170 Fax: 479-750-1172

Client Information				Project Information						Requested Parameters									
Company Name: Southern Aluminum Co., Inc.				Permit/Project #:						Cyanide(9) Metals (See Comments)									
Address: #5 Hwy 82 West Magnolia, AR 71753				Purchase Order #:															
Telephone: 800-221-0408				Work Order #:															
Fax: 870-234-4665				Sampler Name(s): Jeff Farrar															
Contact: Ms. Colleen Tuggle				and Signature(s): <i>Jeff Farrar</i>															
ESC Client Number: 2754																			
Sample Identification			Sample Collection				Sample Containers												
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#										
	1306010513	6-19-13	1:00 pm	Grab	Water	Plastic	1 Liter	NaOH+Ascorbic	1	X									
				Grab	Water	Plastic	8 oz	HNO3 to pH <2*	1	X									
Relinquished By: (Signature and Printed Name) <i>Nanette N. Hoyle</i> Nanette N. Hoyle				Date	Time	Received By: (Signature and Printed Name) <i>Tina Hall</i> Tina Hall				Date	Time	Custody Seals:							
				6-19-13	3:45 pm					6-20-13	1435	Used?	<input type="checkbox"/>	Intact?	<input type="checkbox"/>				
Relinquished By: (Signature and Printed Name) <i>Tina Hall</i> Tina Hall				Date	Time	Received By: (Signature and Printed Name) <i>Anthony Fowler</i> Anthony Fowler				Date	Time	Turnaround:							
				6-20-13	1450					6-20-13	1525	Regular	<input type="checkbox"/>	Special	<input type="checkbox"/>				
Relinquished By: (Signature and Printed Name) <i>Tina Hall</i> Tina Hall				Date	Time	Received for Lab By: (Signature and Printed Name) <i>Anthony Fowler</i> Anthony Fowler				Date	Time	Were samples properly preserved:							
				6-20-13	1450					6-20-13	1525	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>				
Comments: Cd(48.PS), Cr(24.PS), Cu(29.PS), Pb(82.PS), Ni(28.PS), Ag(47.PS), Zn(30.PS)						Flow Data	Field Test	Time	Analyst	Result	Result	Units							
						Analyst:	pH:	1:00 pm	J. Farrar	7.1									
						Time:													
						Reading:													
						Units:													
* Per 40 CFR 136.3 Table II Note 19, samples preserved in laboratory.						Fecal Start:							This Document is Page ___ of ___						

*JFH*  
 G:\WP50\DOC\FORMS\CHAIN.XLS

### Directions