Company Name
TCI Texarkana, Inc.

Facility Name
Texarkana Aluminum

Mailing address
300 Alumax Road

Physical address
300 Alumax Road

City, State, Zip
Nash, TX 75569-

City, State, Zip
Nash, TX 75569-

County

County

WRPA contact
Gregory Felling

Email
gregory_felling@texarkanaalumi

Phone-Ext
4305629822

Fax

TCEQ SWR ID
97462

Customer reference number
CN605599364

EPA ID
TXR000085054

Regulated entity number
RN100215250

TRI ID
75501LMXML300AL

P2 Program ID
P10578

Primary SIC Code
3355

NAICS code
331319

General description of facility
Texarkana Aluminum is a facility that remelts/recycles aluminum to cast sheet ingot for our hot and cold rolling mills. The rolled coils are then sent to our finishing department where they are leveled and trimmed to customer specifications. The sized coils are packaged and shipped to customers.

Worksheet 6: Executive Summary and Certificate of Completeness and Correctness

Planning Cycle: 2024 (1st year) to 2029 (5th year, 1st year plus 4)

Description of waste and TX waste code number:	**Amount generated in tons:**
Parts Washer Fluid containing perchloroethylene 0026113H	0.375

TRI chemicals and CAS Number:	**Amount released or transferred in tons:**
Chlorine. CAS Number 7782505	0.132
Chromium. CAS Number 7440473	0.0011
Copper. CAS Number 7440508	0.0028
Manganese. CAS Number is 7439965	0.017

Provide a prioritized list of pollutants and contaminants to be reduced during five-year period:

Hazardous parts washer fluid.

Casting cooling tower sludge.

Perchloroethylene will be eliminated from the parts washer. The volume of casting cooling water sludge will be reduced by removing excess water with a filter press.

EXECUTIVE SUMMARY, PART 3: P2 PROJECTS AND GOALS

Statement of facility's measurable reduction goals:
During this 5-year period, TCI Texarkana plans to focus on two waste reduction projects. 1. The first project is to eliminate the generation of hazardous waste from its parts washers. We will do this by switching from an aqueous parts washer to a solvent-based parts washer. The second system allows the spent washer fluid to be reclaimed and recycled. The aqueous fluid cannot be reclaimed and must be handled as a hazardous waste. 2. The second project will be to greatly reduce the volume of casting cooling wastewater sludge. We will do this to reduce the volume by using a filter press to remove excess water from the sludge. The filter cake will then be landfilled and the removed water will be recycled. We estimate that we will be able to reduce the current landfill tonnage by 80%. The project is waiting on additional staffing to operate the system 24 hours a day, 5 days a week vs. the current staffing of 8 hours a day, 5 days a week.

Explain the environmental and human health risks considered in determining reduction goals†:
The environmental and human health risks associated with these projects are minimal. Environmentally, the new projects will have a positive impact on the environment by the recycling aspects noted above. Human health risks for both projects pose no greater risk that current practice.

List of pollution prevention projects with an implementation schedule of each project:
The first project will be implemented in quarter one of 2025. Project two is expected to be implemented in quarter four of 2025.

Implementation schedule for future reduction goals:
We believe that the 5-year goals will be reached in the first year of implementation.

Identify cases in which the implementation of source reduction or waste minimization activity may result in the release of a different pollutant or contaminant, or may shift the release to another medium. †
We do not anticipate that a different pollutant or contaminant will result as we implement these projects. Also there will not be a shift in the release of any pollutant to another medium.

* Base year is the year prior to the first year of your plan † Not required for SQG that are non-TRI Form R reporters

CERTIFICATE OF COMPLETENESS AND CORRECTNESS

The person who signs the Certification of Completion should have the authority to commit the corporation's resources to implement the plan. This is usually the plant manager, owner of the facility, or whoever runs the facility.

This document certifies that the Pollution Prevention Plan has been completed and meets the specified requirements of the Waste Reduction Policy Act of 1991, the Solid Waste Disposal Act and 30 TAC §§335.471-335.480, and that the information provided herein is true, correct, and complete.

This certificate should not be signed by the environmental health and safety manager. Signatures from consultants or other third parties are not compliant.

This document also certifies that the person whose signature appears below has the authority to commit the corporate resources necessary to implement this plan.

Name: Pete Velotas Title: Executive Vice President of Operations
(please print clearly)

Position (check one):
_____ Facility Owner
_X_ Corporate Officer

Signature: _____ Date: 1/6/2025

INSTRUCTIONS FOR WORKSHEET 6: EXECUTIVE SUMMARY AND CERTIFICATE OF COMPLETENESS AND CORRECTNESS

The Waste Reduction Policy Act (WRPA) was implemented to intensify efforts to reduce pollution in the state of Texas by encouraging facilities to conduct long-range planning to prevent the generation of pollution, save money, and reduce liability and regulatory burden.

WRPA applies to:

- facilities that report on EPA's Toxic Release Inventory (TRI) Form R
- small quantity generators (SQG) of hazardous waste
- large quantity generators (LQG) of hazardous waste

WRPA requires a company to prepare a five-year Prevention Pollution (P2) Plan, to be kept on site and available for an investigator. In addition, the Executive Summary of the P2 Plan and a signed Certificate of Completeness and Correctness (C3) must be submitted to the TCEQ. For facilities that are LQG and/or TRI Form R reporters, an Annual Progress Report must be submitted to the TCEQ each year.

WRPA does not require you to utilize a certain format or submit a particular form for the P2 Plan or the Executive Summary as long as you have met all the requirements under the Texas Administrative Code Chapter 335.474. However, filling out Worksheet 6 completely, will ensure that your company provides all the required information for the Executive Summary. If your facility is a SQG and does not report on TRI Form R, Worksheet 6 can be used to fulfill the requirements for the P2 Plan, Executive Summary, and C3. Once your facility's P2 Plan is complete, the owner of the facility should sign the C3. If a corporation owns the facility, then an officer of that corporation who has the authority to commit the corporation's resources to implement the plan should sign. By signing the certificate, the owner or officer is certifying that the P2 Plan is complete and correct and meets the requirements of the law.

TCEQ's A Guide to Pollution Prevention Planning (RG-409) provides additional information on the Texas Pollution Prevention Planning law and the process for developing P2 projects that will reduce waste and save money. Forms to document your P2 Plan and track progress, an example of a P2 plan, and tables outlining the minimum documentation requirements for SQG, LQG, and facilities that report on TRI Form R are all included in this guide. Please send the Executive Summary and signed C3 to the address below:

Texas Commission on Environmental Quality Industrial Pollution Prevention Team, MC-108 PO Box 13087 Austin, TX 78711-3087

Due dates are as follows: Initial five-year P2 Plan including Executive Summary and C3: due and implemented within 90 days of submitting first TRI Form R or first Annual Waste Summary Renewed five-year P2 Plan: due January 1 every five years If you have questions on how to fill out this form or about the Waste Reduction Policy Act program, please contact us at 512/239-3143. Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512/239-3282.