

Wilson, Tabatha

From: Torrence, Rufus
Sent: Monday, October 21, 2013 2:32 PM
To: Justin Halford (jwh@twhenterprises.com)
Cc: Wilson, Tabatha
Subject: ARP001054 AR0050784 AFIN 34-00101 October 2013 Semi-Annual Report
Attachments: TWH Oct 2013 SAR A0000W6PH.pdf

ADEQ

ARKANSAS
Department of Environmental Quality

October 18, 2013

Justin Halford, Engineer
TWH Enterprises, LLC
700 Pepsi Cola Road
Batesville, AR 72501

Re: TWH's October 2013 Semi-Annual Report
(Permit No. AR0050784 AFIN 34-00101)

Dear Mr. Halford:

The Department has reviewed TWH's October 2013 Semi-annual Pretreatment Report and the report is complete.

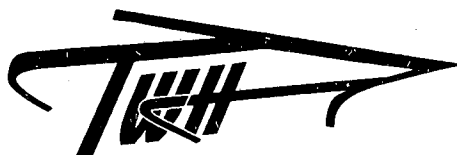
The Department appreciates TWH's continued efforts in semi-annual reporting. If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us.

Sincerely,



Rufus Torrence, Pretreatment Engineer
Water Division

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118 5317 / TELEPHONE 501-681-5317
www.adeq.state.ar.us



TWH ENTERPRISES, LLC

Phone: (870) 251.1200
Fax: (870) 251.1202
E-Mail: twh@twhenterprises.com

700 Pepsi Cola Road
Batesville, AR 72501
www.twhenterprises.com

October 14, 2013

Mr. Rufus J. Torrence, NPDES Pretreatment Engineer
ADEQ – Water Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Semi-Annual Report


Dear Mr. Torrence:

Enclosed please find our above referenced report pursuant to the reporting requirements for industrial users as regulated by 40CFR433. Please note:

THERE ARE NONE OF THE 110 TOXIC ORGANICS PRESENT IN THE TWH FACILITY.

If you should have any questions or require additional information, please feel free to call me. Thank you.

Sincerely,


Justin Halford, Engineer

ADEQ NOTES:

October 2013 SAR

Filedate 20131017

Non-Pret City Updated

AR0050784

AFIN 34-00101

Marked Received by TW: Oct 17, 2013

Scanned In MailRoom: Oct 16, 2013

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

**TWH Enterprises, LLC
700 Pepsi Cola Rd.
Batesville, AR 72501**

B. FACILITY & LOCATION ADDRESS

**TWH Enterprises, LLC
700 Pepsi Cola Rd.
Batesville, AR 72501**

C. FACILITY CONTACT: **Justin Halford** TELEPHONE NUMBER: **870-251-1200** e-mail: **jwh@twhenterprises.com**

(2) REPORTING PERIOD--FISCAL YEAR From Apr 1 to Oct 1 (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

OCTOBER & April

B. PERIOD COVERED BY THIS REPORT

FROM: **4/1/13** TO: **10/1/13**

(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

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

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

C. Number of Regular Employees at this Facility

2

D. [Reserved]

(4) FLOW MEASUREMENT

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Date: 4/1/13	Date: 10/1/13	Type of Discharge
Regulated (Core & Regulated (Cyanide)	Bi-Monthly @ 1000 gallons each ¹		Batch
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary	Average 930 gallons per month ²		Intermittent
Total Flow to POTW			*****

*"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 DI Unit
- None

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	--
Date: 9/9/2013	<0.01	0.31	1.17	0.01	1.07	<0.01	0.197	<0.01	N/A
Date:									

Sample Location Between Filter Press & POTW

Sample Type (Grab or Composite) Grab Sampling

Number of Samples and Frequency Collected 1 sample every 6 months

40CFR136 Preservation and Analytical Methods Use: Yes No

Note 1: 1000/60 = 16.6 gpd Note 2: 930/30 = 31 gpd

(6) CERTIFICATION

A. [Reserved]

N/A

[Reserved]

B. CHECK ONE: G ' 433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED G ' 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.

* No TTOs in this facility

(Typed Name)

(Corporate Officer or authorized representative)

Date of Signature

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 _____, 200__.

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 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:

- No new pollution prevention practices

(8) GENERAL COMMENTS

(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.

T.W. Halford Jr.
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

President
OFFICIAL TITLE

T.W. Halford Jr.
SIGNATURE

10/14/13
DATE SIGNED

There are none of the 110 toxic organics present in the TWH facility.

Per Rufus Torrence – Email dated: 1/27/06

"IF NO TOXIC ORGANICS ARE FOUND ON THE MSDS SHEET, TWH WILL NOT HAVE TO SUBMIT A TOMP OR TEST FOR TOXIC ORGANICS FOR PRETREATMENT REPORTING."

*Rufus Torrence forwarded me a copy of the:
"40CFR122 APP D / CHEMICAL ABSTRACT SYSTEM - PPS-CAS.wpc - TABLE II"*

After review of the TWH facility MSDS sheets, I concluded that NONE of the CAS numbers in Abstract System Table II matched the TWH facility MSDS CAS numbers.

Per Justin Halford- 1/30/06

Per Rufus Torrence – Email dated: 1/30/06

"Since you do not have any of the 110 toxic organics in your plant, you may simply submit a letter (instead of a TOMP) which states that none of the toxic organics are present in the TWH facility."

This is the letter stating that none of the 110 toxic organics are present in the TWH facility.

Arkansas Testing Laboratories

3301 Langley Drive · Searcy, AR 72143

(501) 268-6431 f(501) 268-9314

NPDES Wastewater Monitoring

Water and Wastewater Analysis

Concrete, Asphalt, and Aggregate Testing

Geotechnical Testing

Industrial and Construction Quality Control

TWH ENTERPRISES

Collection Date / Time: September 9, 2013

10:00 AM BET

WATER ANALYSIS

Collection Place: TANK - EFFLUENT

Parameter	Date / Time		Date / Time End	Results	Unit	Analyst	% Spike	Rel %	Sample Type	BET
	Begin									Ref #
pH	09/09	10:02 PM	NA	6.47	S.U.	BET	NA	0.27	Grab	1
CYANIDE	09/13	1:00 PM	NA	< 0.01	mg/l	KLB	89.9	0.00	Grab	2
CADMIUM	10/07	2:49 PM	NA	< 0.01	mg/l	KLB	102.5	0.91	Grab	3
CHROMIUM	10/07	2:49 PM	NA	0.31	mg/l	KLB	102.4	0.20	Grab	3
COPPER	10/07	2:49 PM	NA	1.17	mg/l	KLB	105.1	0.31	Grab	3
LEAD	10/07	2:49 PM	NA	0.01	mg/l	KLB	101.7	1.24	Grab	3
NICKEL	10/07	2:49 PM	NA	1.07	mg/l	KLB	103.9	0.66	Grab	3
SILVER	10/07	2:49 PM	NA	< 0.01	mg/l	KLB	95.0	0.00	Grab	3
ZINC	10/07	2:49 PM	NA	0.197	mg/l	KLB	108.8	0.19	Grab	3

Quality Assurance: All Parameters include 10% duplication studies by random selection. The following equipment is checked and calibrated daily: pH meter, balance, incubators, water baths, drying oven and sterilizing apparatus. Ammonia Nitrogen and Oil & Grease Analysis include duplication and spike studies at a rate of at least 10%.

Notes: Samples iced at collection. Preserved with H₂SO₄ to pH₂; Oil & Grease, Ammonia, COD

References:

Analysis complies with 40 CFR Part 136:

1. SM 4500-HB
2. SM 4500CN-E
3. SM 3111 B



Neville Adams, Manager

Arkansas Testing Laboratories

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

CLIENT: TWH Enterprises						PARAMETERS					
SAMPLE ID	SAMPLE MATRIX	SAMPLED BY: <i>[Signature]</i>				CALIBRATION		PRESERVATIVES			
EFF	W=H2O	DATE	TIME	GRAB		pH		NaOH	HNO ₃		
INF	S=SLUDGE					10.02		Cyanide	METALS		
CLAR	D=SOIL										
POND	C=WELL										
BACKWASH											
EFF	W	9-9-13	10:00	X		6.47		1-Q-P	1-Q-P		
# = number of bottles		Q, L, H, G = Quart, Liter, Half Gallon, Gallon				P, G = Plastic, Glass					
Relinquished by:		Date/Time			Received by:			Date/Time			
Relinquished by:		Date/Time			Received by: <i>[Signature]</i>			Date/Time: 9-9-13 11:05am			

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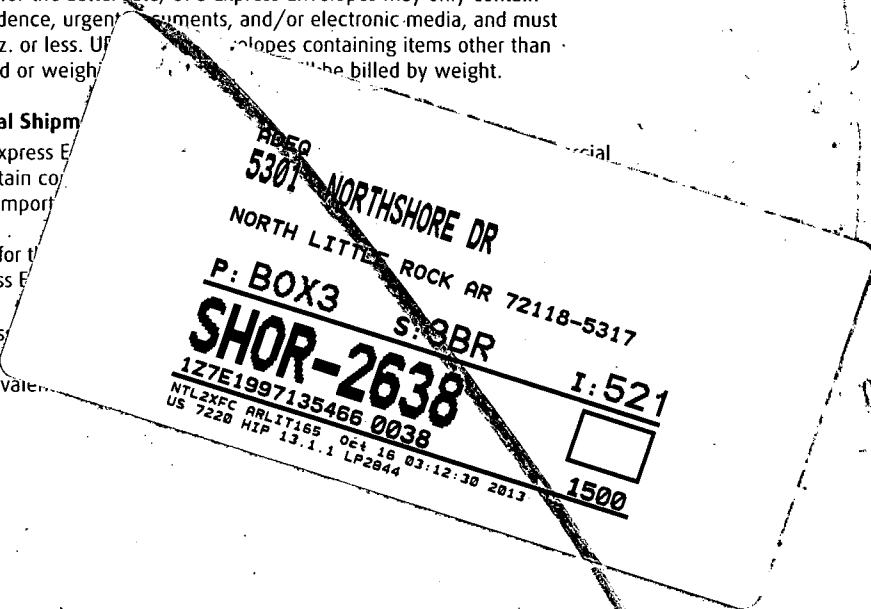
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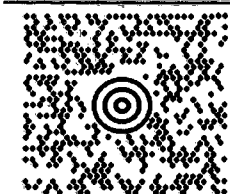
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(870) 251-1200
TWH ENTERPRISES, LLC
700 PEPSI COLA RD
BATESVILLE AR 72501

LTR 1 OF 1

SHIP TO:
MR. RUFUS TORRENCE, WATER DIVISION
ADEQ
5301 NORTHSHORE DR.
NORTH LITTLE ROCK AR 72118

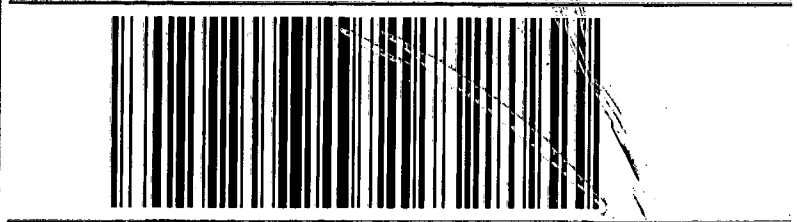


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