

Gage, Hannah

From: Johnson, Lindsay
Sent: Monday, April 17, 2017 9:35 AM
To: 'jwh@twhenterprises.com'
Cc: 'southside_water@hotmail.com'; Leamons, Bryan; McWilliams, Carrie; Yates, Adam; Gage, Hannah
Subject: AR0050784_TWH ARP001054 Apr 2017 Semi Annual Pretreatment Report_20170417
Attachments: 4-12-2017 TWH Enterprises.pdf

Justin,

TWH Enterprises' April 2017 semi-annual Pretreatment report was electronically received, reviewed, deemed complete and compliant with reporting requirements in 40 CFR 403.12(e) and with Metal Finishing standards in 40 CFR 433.17.

No further action is deemed necessary at this time.

Thank you,

*Lindsay Johnson
NPDES Staff Engineer
ADEQ-Office of Water Quality
(501)682-0045*

E/NPDES/NPDES/Pretreatment/Reports



TWH ENTERPRISES, LLC

Phone: (870) 251.1200
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700 Pepsi Cola Road
Batesville, AR 72501
www.twhenterprises.com

April 12, 2017

Mr. Adam Yate, NPDES Permit Engineer
ADEQ – Water Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Semi-Annual Report

Dear Mr. Yate:

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,

A handwritten signature in black ink, appearing to read 'Justin Halford', is written over a horizontal line. The signature is stylized and cursive.

Justin Halford, Engineer

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: 10/1/16 **TO:** 4/1/17

(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: 10/1/16	Date: 4/1/17	Type of Discharge
Regulated (Core & Regulated (Cyanide) §403.6(e) Unregulated* §403.6(e) Dilute Cooling Water	Bi-Monthly @ 1000 gallons each		Batch
Sanitary	Average 930 gallons per month		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: 3/24/2017	<0.004	0.215	0.236	<0.05	1.012	<0.01	0.159	<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

(6) CERTIFICATION

A. [Reserved]

N/A

[Reserved]

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.

(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 _____.

The User may list any new or ongoing Pollution Prevention practices:

- No new pollution prevention practices

(8) GENERAL COMMENTS

(9) SIGNATORY REQUIREMENTS [40CFR403.12(I)]

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
4/12/17
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 (844) 318-7030

NPDES Wastewater Monitoring
 Water and Wastewater Analysis
 Concrete, Asphalt, and Aggregate Testing
 Geotechnical Testing
 Industrial and Construction Quality Control

TWH ENTERPRISES

Collection Date / Time: March 24, 2017 8:20 AM BET
 Collection Place: TANK - EFFLUENT / METALS
 Collection Date / Time: March 24, 2017 8:20 AM BET
 Collection Place: TANK - EFFLUENT / pH & CYANIDE

WATER ANALYSIS

Parameter	Date / Time Begin	Date / Time End	Results	Unit	Analyst	% Spike	Rel %	Sample Type	Ref #
pH	03/24 8:20 AM	NA	7.11	S.U.	BET	NA	0.13	Grab	1
CYANIDE	03/31 9:00 AM	NA	< 0.01	mg/l	KLB	100.0	0.00	Grab	2
CADMIUM	03/28 1:01 PM	NA	< 0.004	mg/l	KLB	105.3	0.00	Grab	3
CHROMIUM	03/28 1:01 PM	NA	0.215	mg/l	KLB	109.0	0.00	Grab	3
COPPER	03/28 1:01 PM	NA	0.236	mg/l	KLB	104.8	8.70	Grab	3
LEAD	03/28 1:01 PM	NA	< 0.05	mg/l	KLB	102.0	0.00	Grab	3
NICKEL	03/28 1:01 PM	NA	1.012	mg/l	KLB	110.0	0.00	Grab	3
SILVER	03/28 1:01 PM	NA	< 0.01	mg/l	KLB	91.0	0.00	Grab	3
ZINC	03/28 1:01 PM	NA	0.159	mg/l	KLB	111.2	0.00	Grab	3

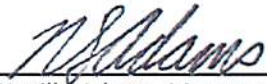
Quality Assurance: All Parameters include 10% duplication studies by random selection. The following equipment is checked and calibrated daily: pH meter, balance, incubators, water baths, drying oven and sterilizing apparatus. Ammonia Nitrogen and Oil & Grease Analysis include duplication and spike studies 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-2000
2. SM 4500CN-E-1999
3. SM 3120 B-1999



Neville Adams, Manager

Arkansas Testing Laboratories

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

CLIENT: TWH Enterprises					PARAMETERS									
SAMPLE ID	SAMPLE MATRIX	SAMPLED BY: <i>BS</i>								CALIBRATION		PRESERVATIVES		
EFF										pH/DO# <i>128</i>		NaOH	HNO ₃	
INF	W=H2O	DATE	TIME		GRAB					pH		Cyanide	METALS	
CLAR	S=SLUDGE									<i>8:20</i>				
POND	D=SOIL													
BACKWASH	C=WELL													
EFF	W	<i>3-24-17</i>	<i>8:20</i>		X					<i>7.11</i>		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>into lab</i> <i>BS Temple</i>					Date/Time <i>3-24-17 9:15</i>				