

Peltier, Hannah

From: Gilliam, Allen
Sent: Friday, October 31, 2014 11:56 AM
To: jwh@twhenterprises.com
Cc: 'T.w. Halford'; Vonda Crowl; Fuller, Kim; Peltier, Hannah; southside_water@hotmail.com; southsidewastewater@sbcglobal.com
Subject: AR0050784_TWH ARP001054 Oct 2014 Semi Annual Pretreatment Report with ADEQ reply_20141022
Attachments: 10-21-2014-----ADEQ Report.pdf

Justin,

TWH's semi-annual Pretreatment report was electronically received, reviewed, deemed complete and compliant with the Federal Pretreatment reporting requirements in 40 CFR 403.12(e) and more specifically in compliance with the Metal Finishing standards in 40 CFR 433.17. No further action is deemed necessary at this time.

As previously mentioned in TWH's April 2014 semi-annual Pretreatment report, the chain of custody (C of C) is not complete. Someone's initials are in the "sampled by" box showing time of sampling at 11:10 a.m. on 9/11/14, but there's no one identified who it was "relinquished by" to (I'm assuming) the lab who received it on 9/11/14 at 7:35 p.m. Again, a broken C of C's analytical results may not be admissible in a court of law. Would you please address before submittal of TWH's next semi-annual report? Complete Cs of C would be in TWH's best interest.

Thank you for your timely report remaining in compliance with the Federal Pretreatment Regulations in 40 CFR 403.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: John Richardson, Manager of Southside Public Water Authority and Mark Carlson, Southside Public Water Authority Wastewater Plant Superintendent

E/NPDES/NPDES/Reports/Pretreatment

On 10/22/2014 11:30 AM, Justin wrote:

Allen,
Attached is the semi-annual report for October.

--

Thanks,
Justin Halford
TWH Enterprises, LLC

700 Pepsi Cola Rd.
Batesville, AR 72501
870-251-1200
www.twhenterprises.com



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 21st, 2014

Mr. Allen Gilliam, ADEQ State Pretreatment Coordinator
ADEQ – Water Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Semi-Annual Report

Dear Mr. Gilliam:

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.

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: 4/1/14 TO: 10/1/14

(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: 4/1/14 | Date: 10/1/14 | Type of Discharge |
|------------------------------|--------------------------------|---------------|-------------------|
| Regulated (Core & Ancillary) | Bi-Monthly @ 1000 gallons each | | Batch |
| Regulated (Cyanide) | | | |
| §403.6(e) Unregulated* | | | |
| §403.6(e) Dilute | | | |
| Cooling Water | | | |
| Sanitary | Average 930 gallons per month | | Intermittent |
| Total Flow to POTW | | | ***** |

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

(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: 9/30/2014 | <0.004 | 0.022 | 0.067 | <0.02 | 0.025 | <0.003 | 0.006 | <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]

[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.

T.w. Halford Jr.
(Typed Name)

T.W. Halford Jr.
(Corporate Officer or authorized representative)

Date of Signature 10/21/14

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(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

T.W. Halford Jr.
SIGNATURE

President
OFFICIAL TITLE

10/21/14
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 30, 2014 1:55 PM BET

Collection Place: TANK - EFFLUENT / METALS

Collection Date / Time: September 11, 2014 11:10 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 # | BET |
|-----------|-------------------|-----------------|---------|------|---------|---------|-------|-------------|-------|-----|
| pH | 09/11 11:11 AM | NA | 8.93 | S.U. | BET | NA | 0.28 | Grab | 1 | |
| CYANIDE | 09/22 12:40 PM | NA | < 0.01 | mg/l | KLB | 94.5 | 0.00 | Grab | 2 | |
| CADMIUM | 10/03 4:43 PM | NA | < 0.004 | mg/l | KLB | 91.5 | 1.28 | Grab | 3 | |
| CHROMIUM | 10/03 4:43 PM | NA | 0.022 | mg/l | KLB | 89.6 | 0.09 | Grab | 3 | |
| COPPER | 10/03 4:43 PM | NA | 0.067 | mg/l | KLB | 90.7 | 4.13 | Grab | 3 | |
| LEAD | 10/03 4:43 PM | NA | < 0.02 | mg/l | KLB | 92.9 | 0.01 | Grab | 3 | |
| NICKEL | 10/03 4:43 PM | NA | 0.025 | mg/l | KLB | 96.8 | 0.69 | Grab | 3 | |
| SILVER | 10/03 4:43 PM | NA | < 0.003 | mg/l | KLB | 93.0 | 0.07 | Grab | 3 | |
| ZINC | 10/03 4:43 PM | NA | 0.006 | mg/l | KLB | 95.6 | 0.69 | 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>BT</i> | | | | | | CALIBRATION | | PRESERVATIVES | | |
| EFF | | | | | | | | pH/DO# | 0298 | NaOH | HNO ₃ | |
| INF | W=H2O | DATE | TIME | | GRAB | | | pH | | Cyanide | METALS | |
| CLAR | S=SLUDGE | | | | | | | | | | | |
| POND | D=SOIL | | | | | | | | | | | |
| BACKWASH | C=WELL | | | | | | | | | | | |
| EFF | W | 9-11-14 | 11:10 AM | | X | | | 11:11 AM | | | | |
| | | | | | | | | x9.93 | | 1-Q-P | 1-Q-P | |
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| # = 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>BT</i> | | | Date/Time: 9-11-14 7:35 PM | | | |

Arkansas Testing Laboratories

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

| | | | | | | | | | | | |
|-------------------------|---------------|--|------|------|--|--------------------------------|--|-------------------------|--------------------|--|--|
| CLIENT: TWH Enterprises | | | | | | PARAMETERS | | | | | |
| SAMPLE ID | SAMPLE MATRIX | SAMPLED BY: <i>RSB</i> | | | | CALIBRATION | | PRESERVATIVES | | | |
| EFF | W=H2O | DATE | TIME | GRAB | | pH/DO# | | NaOH | HNO ₃ | | |
| INF | S=SLUDGE | | | | | pH | | Cyanide | METALS | | |
| CLAR | D=SOIL | | | | | | | | <i>retest only</i> | | |
| POND | C=WELL | | | | | | | | | | |
| BACKWASH | | | | | | | | | | | |
| EFF | W | 9-30-14 | 1:55 | X | | | | 1-Q-P | 1-Q-P | | |
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| # = 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>St. Temple</i> | | Date/Time: 9-30-14 7:15 | | | |