

**From:** [Gilliam, Allen](#)  
**To:** [Justin](#); [Vonda Crowl](#); [TW HALFORD JR](#)  
**Cc:** [Burrow, Kealey](#); [southside\\_water@hotmail.com](mailto:southside_water@hotmail.com); [southsidewastewater@sbcglobal.com](mailto:southsidewastewater@sbcglobal.com)  
**Subject:** AR0050784\_TWH ARP001054 Oct 2015 semi annual Pretreatment report with corrected response\_20151020  
**Date:** Tuesday, October 20, 2015 11:02:42 AM  
**Attachments:** [10-19-2015-----ADEQ Report.pdf](#)

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Justin,

TWH Enterprises' October 2015 semi-annual report (attached) was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically with the Metal Finishing standards in 40 CFR 433.15.

It is now understood that the sampler works for your contract lab; therefore, the confusion on my part as to why the chain of custody did not look complete. In the future Arkansas Testing Labs will ensure the sampler's name is associated with this contract lab.

Thank you for your timely report.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

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

[E/NPDES/NPDES/Pretreatment/Reports](#)

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**From:** Justin [<mailto:jwh@twhenterprises.com>]  
**Sent:** Monday, October 19, 2015 4:31 PM  
**To:** Gilliam, Allen  
**Subject:** Re: Oct 2015 semi-annual Pretreatment report

Allen,

Yes, I had this on my to-do list. I've just been so busy the past few days that I haven't had a chance to work on it. I did just finish it though and I've attached it to this email.

Thanks,

Justin Halford  
TWH Enterprises, LLC  
700 Pepsi Cola Rd.  
Batesville, AR 72501  
870-251-1200  
[www.twhenterprises.com](http://www.twhenterprises.com)



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700 Pepsi Cola Road  
Batesville, AR 72501  
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October 19, 2015

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 white background. 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:** 4/1/15      **TO:** 10/1/15

**(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

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\*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**

  2  

**D. [Reserved]**

**(4) FLOW MEASUREMENT**

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

Process	Date: 4/1/15	Date: 10/1/15	Type of Discharge
Regulated (Core & Regulated (Cyanide) §403.6(e) Unregulated* §403.6(e) Dilute Cooling Water Sanitary Total Flow to POTW	Bi-Monthly @	1000 gallons each	Batch
	Average 930 gallons per month		Intermittent
			*****

\*"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: 10/5/2015	<0.004	<0.02	0.054	<0.05	<0.02	<0.01	0.020	<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: 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.

\_\_\_\_\_  
(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

10/19/15  
DATE SIGNED

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

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**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.”*

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*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**

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**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.”*

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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: October 5, 2015 1:45 PM BET

Collection Place: TANK - EFFLUENT / METALS

Collection Date / Time: October 5, 2015 1:45 PM 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	10/05 1:46 PM	NA	7.23	S.U.	BET	NA	0.26	Grab	1
CYANIDE	10/12 10:00 AM	NA	< 0.01	mg/l	KLB	104.3	0.00	Grab	2
CADMIUM	10/08 3:07 PM	NA	< 0.004	mg/l	KLB	98.3	0.00	Grab	3
CHROMIUM	10/08 3:07 PM	NA	< 0.02	mg/l	KLB	92.0	14.74	Grab	3
COPPER	10/08 3:07 PM	NA	0.054	mg/l	KLB	88.1	0.24	Grab	3
LEAD	10/08 3:07 PM	NA	< 0.05	mg/l	KLB	86.4	16.09	Grab	3
NICKEL	10/08 3:07 PM	NA	< 0.02	mg/l	KLB	89.5	17.91	Grab	3
SILVER	10/08 3:07 PM	NA	< 0.01	mg/l	KLB	102.4	0.00	Grab	3
ZINC	10/08 3:07 PM	NA	0.020	mg/l	KLB	93.1	7.61	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 H<sub>2</sub>SO<sub>4</sub> to pH<sub>2</sub>; Oil & Grease, Ammonia, COD

### References:

Analysis complies with 40 CFR Part 136:

1. SM 4500-HB
2. SM 4500CN-E
3. SM 3120 B

  
 Neville Adams, Manager



# Arkansas Testing Laboratories

## CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

CLIENT: TWH Enterprises

SAMPLE ID	SAMPLE MATRIX	SAMPLED BY: <span style="float: right;">SD</span>		PARAMETERS				
				GRAB	CALIBRATION	PRESERVATIVES		
INF	W=H2O S=SLUDGE D=SOIL C=WELL	DATE	TIME	pH	pH/DO#	NaOH	HNO <sub>3</sub>	
CLAR						Cyanide	METALS	
POND								
BACKWASH								
EFF	W	10-5-15	1:45 P		1:46			
					2:23		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>	Date/Time
		<i>BT Perdue</i>	<i>10-5-15</i>

S:29