

Gage, Hannah

Subject: AR0050784_TWH ARP001054 Oct 2016 Semi Annual Pretreatment Report_20161018
Attachments: 10-17-2016-----ADEQ Report.pdf

From: Gilliam, Allen
Sent: Tuesday, October 18, 2016 8:23 AM
To: 'Justin'
Cc: TW HALFORD JR; Vonda Crowl; Yates, Adam; McWilliams, Carrie; Leamons, Bryan; 'southside_water@hotmail.com'
Subject: AR0050784_TWH ARP001054 Oct 2016 Semi Annual Pretreatment Report_20161018

Justin,

TWH Enterprises' October 2016 semi-annual Pretreatment report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically compliant with the Metal Finishing standards in 40 CFR 433.17. No further action is deemed necessary at this time.

Thank you for your timely report.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

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

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

From: Justin [<mailto:jwh@twhenterprises.com>]
Sent: Monday, October 17, 2016 3:48 PM
To: Gilliam, Allen
Cc: TW HALFORD JR; Vonda Crowl
Subject: TWH Semi-Annual Report

Allen,

Attached is our October Semi-Annual Report. Below is a copy of our emails in the past talking about how our sample is collected and submitted into the testing lab. You had talked to Gene at Arkansas Testing and decided our current method was acceptable.

Thanks,
Justin Halford
TWH Enterprises, LLC
700 Pepsi Cola Rd.
Batesville, AR 72501
870-251-1200
www.twhenterprises.com

On 4/11/2016 2:28 PM, Gilliam, Allen wrote:

My bad Justin,

I have a number of industries who still don't send in a complete C of C and I (getting old) had forgotten what was discussed with you and your lab 6 months ago.

All I saw was some hen scratchin for the sampler. Can you make out a "BET" for the sampler? Yes, the current method will work if a person could tell the sampler was the same person who received it in the lab.

Apologies for my memory lapse, I'll make another note out regarding TWH's C of C if "BET" can print his name in "sampled by" box, the same as he did in the "received into lab" box. There would have no question in my mind if that had happened on this report.

I know this is nit-picky, but EPA does have rules regarding complete chains of custody. The folks handling the sample from collection to the lab have to be clearly identifiable on the C of C.

Respectfully,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

From: Justin [<mailto:jwh@twhenterprises.com>]
Sent: Monday, April 11, 2016 2:03 PM
To: Gilliam, Allen
Cc: TW HALFORD JR; Vonda Crowl
Subject: Re: AR0050784_TWH ARP001054 Oct 2015 semi annual Pretreatment report_20151020

Allen,

Please see the emails below. We have had this discussion a few times in the past. I believe you called and talked to Arkansas Testing last time and it was agreed the current method will be ok.

Thanks,
Justin Halford
TWH Enterprises, LLC
700 Pepsi Cola Rd.
Batesville, AR 72501
870-251-1200
www.twhenterprises.com

On 10/20/2015 1:37 PM, Justin wrote:

Allen,
Ok sounds good.

Thanks,
Justin Halford
TWH Enterprises, LLC
700 Pepsi Cola Rd.
Batesville, AR 72501
870-251-1200
www.twhenterprises.com

On 10/20/2015 10:55 AM, Gilliam, Allen wrote:

Justin,

Ok, I just got off the phone with ATL (Lori Barbee) and she explained the sampler works for them (I did not know or remember this). From now on she's going to have this "B.E. Templeton" sign the "Sampled by box" associating his name with ATL and make the same correction down at the bottom right that it was "Received into lab" by him also.

I asked her to please footnote any "reminders" of this on the C of C in the future for anyone's clarification.

A corrected response to your semi-annual report is forthcoming.

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

From: Justin [<mailto:jwh@twhenterprises.com>]
Sent: Tuesday, October 20, 2015 9:37 AM
To: Gilliam, Allen
Cc: TW HALFORD JR; Vonda Crowl
Subject: Re: AR0050784_TWH ARP001054 Oct 2015 semi annual Pretreatment report_20151020

Allen,

Can you tell me what I need to change in order to be in compliant with 40 CFR 403.12(e) ?

It was my understanding that you and Gene of Arkansas Testing had come to an agreement of how this chain of custody will be handled. I reminded Gene of our last chain of custody issues when he picked up the sample and he said he knew how to handle it this time.

Thanks,
Justin Halford
TWH Enterprises, LLC
700 Pepsi Cola Rd.

Batesville, AR 72501
870-251-1200
www.twhenterprises.com

On 10/20/2015 9:00 AM, Gilliam, Allen wrote:

Justin,

TWH Enterprises' October 2015 semi-annual report (attached) was electronically received, reviewed, deemed complete, but not compliant with the reporting requirements in 40 CFR 403.12(e). TWH, however, is in compliance with the Metal Finishing standards in 40 CFR 433.15.

Note (4th time): The chain of custody is not complete. This office can see the sampler's initials, but it does not show who relinquished it to the contract lab. Broken chains of custody may not be admissible in a court of law. Please be more aware of how important a complete chain of custody may be to prove your samples' validity. Contact with your contract lab to discuss your samples' complete "paperwork trail" would be prudent.

Thank you for your timely report.

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/Pretreatment/Reports



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 17, 2016

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

(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: 4/1/16	Date: 10/1/16	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 Intermittent *****

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

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

B. COMMENTS ON TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

- Neutralization
- Chemical Precipitation and Sedimentation
- Chromium Reduction
- Cyanide Destruction
- Other DI Unit
- None

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: 9/21/2016	<0.004	0.695	0.605	0.014	0.310	<0.01	0.083	0.02	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 _____, 20__.

Notary Public in and for _____
County, Arkansas

My commission expires _____.

'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

10/17/16
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 21, 2016 8:25 AM BET
 Collection Place: TANK - EFFLUENT / METALS
 Collection Date / Time: September 21, 2016 8:27 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	09/21 8:27 AM	NA	8.01	S.U.	BET	NA	0.14	Grab	1
CYANIDE	10/03 9:10 AM	NA	0.02	mg/l	KLB	96.2	5.00	Grab	2
CADMIUM	09/30 5:37 PM	NA	< 0.004	mg/l	KLB	99.5	0.00	Grab	3
CHROMIUM	09/30 5:37 PM	NA	0.695	mg/l	KLB	100.5	0.00	Grab	3
COPPER	09/30 5:37 PM	NA	0.605	mg/l	KLB	101.3	8.70	Grab	3
LEAD	09/30 5:37 PM	NA	0.014	mg/l	KLB	88.0	0.00	Grab	3
NICKEL	09/30 5:37 PM	NA	0.310	mg/l	KLB	99.8	0.00	Grab	3
SILVER	09/30 5:37 PM	NA	< 0.01	mg/l	KLB	100.0	0.00	Grab	3
ZINC	09/30 5:37 PM	NA	0.083	mg/l	KLB	108.7	13.33	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>SB</i>					CALIBRATION		PRESERVATIVES			
EFF							pH/DO# <i>07016</i>		NaOH	HNO ₃		
INF	W=H2O	DATE	TIME		GRAB		pH		Cyanide	METALS		
CLAR	S=SLUDGE						<i>8:27m</i>					
POND	D=SOIL											
BACKWASH	C=WELL											
EFF	W	<i>9-21-16</i>	<i>x 8:25</i>		X		<i>x 8.01</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>BB Templeton</i>			Date/Time: <i>9-21-16 5:15p</i>			