

Torrence, Rufus

From: Torrence, Rufus
Sent: Monday, October 31, 2011 9:46 AM
To: Justin Halford (jwh@twhenterprises.com)
Subject: ARP001054 AFIN 34-00101 AR005084 TWH October 2011 Semi-Annual Report: Complete

ATTN: Justin Halford

TWH October Semi-Annual Report has been received and is complete.

Rufus Torrence, Engineer
ADEQ
(501) 682-0626
torrence@adeq.state.ar.us

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@twjenterprises.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: 4/1/11 **TO:** 10/1/11

(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

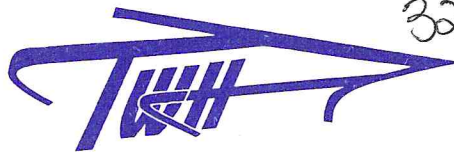
*October 2011 SAR
Filed ate 2011 10 31
AR P 00 10 54
AR 00 50 84
AFIN 34 - 00 101*

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

C. Number of Regular Employees at this Facility

2

D. [Reserved]



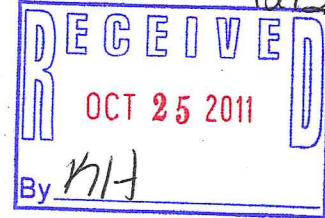
TWH ENTERPRISES, LLC

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

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

October 24, 2011

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,

A handwritten signature in black ink, appearing to read 'Justin Halford'.

Justin Halford, Engineer

(4) FLOW MEASUREMENT

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

Process	Date: 4/1/11	Date: 10/1/11	Type of Discharge
Regulated (Core & Ancillary)	Bi-Monthly @ 1000 gallons each (1)		Batch
Regulated (Cyanide)			
§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: 9/15/2011	<0.004	0.16	0.05	<0.04	0.34	<0.007	0.019	<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

(1) $1000/60 = 16.6 \text{ gpd}$

(2) $930/30 = 31 \text{ gpd}$

(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 _____.

(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

T.W. Halford Jr.
SIGNATURE

Vice President
OFFICIAL TITLE

10-24-11
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 15, 2011

9:30 AM BET

WATER ANALYSIS

Collection Place: TANK - EFFLUENT

Parameter	Date / Time		Date / Time		Results	Unit	Analyst	% Spike	Rel %	Sample Type	BET
	Begin		End								Ref #
pH	09/15	9:30 AM	NA		7.09	S.U.	BET	NA	0.13	Grab	1
CYANIDE	09/23	1:00 PM	NA		< 0.01	mg/l	BET	98.0	0.00	Grab	2
CADMIUM	09/23	2:35 PM	09/25	5:50 PM	< 0.004	mg/l	AI270	93.5	0.13	Grab	3
CHROMIUM	09/23	2:35 PM	09/25	5:50 PM	0.16	mg/l	AI270	98.8	0.20	Grab	3
COPPER	09/23	2:35 PM	09/25	5:50 PM	0.05	mg/l	AI270	90.5	0.84	Grab	3
LEAD	09/23	2:35 PM	09/25	5:50 PM	< 0.04	mg/l	AI270	91.9	0.50	Grab	3
NICKEL	09/23	2:35 PM	09/25	5:50 PM	0.34	mg/l	AI270	91.0	0.45	Grab	3
SILVER	09/23	2:35 PM	09/25	5:50 PM	< 0.007	mg/l	AI270	101.0	1.42	Grab	3
ZINC	09/23	2:35 PM	09/25	5:50 PM	0.019	mg/l	AI270	90.9	0.97	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. EPA 200.7


 Neville Adams, Manager

Arkansas Testing Laboratories

3301 Langley Drive
 Searcy, AR 72143
 Off 501-268-6431
 Fax 501-268-9314

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

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

CLIENT: TWH

SAMPLE ID EFF INF CLAR POND BACKWASH	SAMPLE MATRIX W=H2O S=SLUDGE D=SOIL C=WELL	SAMPLED BY:			SAMPLING METHOD			Calibration pH / DO #	PARAMETERS						
		DATE	TIME	Grab	Flow	Time	Grab		Flow	Time	Grab	Flow	Time	Preservatives	
<u>CH</u>	<u>W</u>	<u>9/15/11</u>	<u>9:30</u>				<u>pH</u> <u>7.09</u> <u>7.09</u>	<u>CV</u> <u>method</u>							
# = number of bottles															
Relinquished by:															
Relinquished by:															

= number of bottles Q, L, H = Quart, Liter, Half Gallon P, G = Plastic, Glass
 Relinquished by: Date/Time Received by:
 Relinquished by: Date/Time Received by: BB Langley 9-15-11 10:30