

## Wilson, Tabatha

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**From:** Gilliam, Allen  
**Sent:** Thursday, May 08, 2014 12:14 PM  
**To:** Justin  
**Cc:** Fuller, Kim; 'T.w. Halford'; Vonda Crowl; Wilson, Tabatha; southside\_water@hotmail.com  
**Subject:** AR0050784\_TWH Enterprises ARP001054 April 2014 semi annual Pretreatment report with ADEQ reply\_20140508  
**Attachments:** 4-2-2014-----ADEQ Report.pdf

Justin,

TWH Enterprises' April 2014 semi-annual Pretreatment report was received, reviewed and deemed not complete with the reporting requirements in 40 CFR 403.12(i). The report does indicated TWH is in compliance with the Metal Finishing standards in 40 CFR 433.17.

Previous correspondence (1/06) found in TWH's file and on the cover letter of this semi-annual report does state "There are none of the toxic organics [in 40 CFR 433.11] present in the TWH facility". This statement should be certified to and would be TWH's toxic organic management "plan" regardless of how this "plan" may look on the surface. The certification statement on TWH's semi-annual report, Section 6 "Certification" statement in B. must be signed and dated by a "corporate official or authorized representative" to complete the semi-annual report.

A cautionary note needs to be made. The chain of custody (C of C) is not complete for the sample taken and may not be admissible in a court of law. The sampler's initials should be replaced by a printed name, then signed. The C of C does not show who the sampler relinquished the sample to (and so on and so forth) until it reached the lab. An (unintelligible) person at the lab received it, but the time of receipt is also unintelligible. Please take note of this, contact Environmental Testing Labs and correct for TWH's next semi-annual report unless the sampler actually hand delivered the sample to the lab for conducting the analyticals. Names and times on the C of C should be legible.

Thank you for your timely report and attention to the above matters.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: John Richardson, Manager – Southside Public Water Authority

E/NPDES/NPDES/Pretreatment/Reports

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**From:** Justin [<mailto:jwh@twhenterprises.com>]  
**Sent:** Wednesday, April 02, 2014 1:40 PM  
**To:** Gilliam, Allen  
**Cc:** 'T.w. Halford'; Vonda Crowl  
**Subject:** TWH semi-annual report

Allen,  
Please see the attached semi-annual report.

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



TWH ENTERPRISES, LLC

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700 Pepsi Cola Road  
Batesville, AR 72501  
[www.twhenterprises.com](http://www.twhenterprises.com)

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April 2, 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**

<p><b>A. LEGAL NAME &amp; MAILING ADDRESS</b></p> <p><b>TWH Enterprises, LLC</b>  <b>700 Pepsi Cola Rd.</b>  <b>Batesville, AR 72501</b></p>	<p><b>B. FACILITY &amp; LOCATION ADDRESS</b></p> <p><b>TWH Enterprises, LLC</b>  <b>700 Pepsi Cola Rd.</b>  <b>Batesville, AR 72501</b></p>
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**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)**

<p><b>A. MONTHS WHICH REPORTS ARE DUE</b></p> <p><u>    OCTOBER    </u> &amp; <u>    April    </u></p>	<p><b>B. PERIOD COVERED BY THIS REPORT</b></p> <p><b>FROM:</b> 10/1/13      <b>TO:</b> 4/1/14</p>
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**(3) DESCRIPTION OF OPERATION**

<p><b>A. REGULATED PROCESSES</b></p> <p><b><u>CORE PROCESS(ES)</u></b></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Electroplating</p> <p><input type="checkbox"/> Electroless Plating</p> <p><input checked="" type="checkbox"/> Anodizing</p> <p><input type="checkbox"/> Coating</p> <p><input type="checkbox"/> Chemical Etching and Milling</p> <p><input type="checkbox"/> Printed Circuit Board Manufacture</p> <p><b><u>ANCILLARY PROCESS(ES)*</u></b></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p>	<p><b>B. CHANGES:</b>      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.</p> <p><b>- NONE</b></p>
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\*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: 10/1/13	Date: 4/1/14	Type of Discharge
Regulated (Core & Cyanide)	Bi-Monthly @ 1000 gallons each		Batch
§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(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: 3/13/2014	<0.004	0.004	0.01	<0.02	<0.004	<0.003	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 \_\_\_\_\_.

(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

President  
OFFICIAL TITLE

  
SIGNATURE  
4/2/14  
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: March 13, 2014

8:30 AM BET

## WATER ANALYSIS

Collection Place: TANK - EFFLUENT

Parameter	Date / Time		Date / Time End	Results	Unit	Analyst	% Spike	Rel %	Sample Type	BET
	Begin									Ref #
pH	03/13	8:30 AM	NA	7.84	S.U.	BET	NA	0.28	Grab	1
CYANIDE	03/18	10:00 AM	NA	< 0.01	mg/l	KLB	89.9	0.00	Grab	2
CADMIUM	03/17	4:25 PM	NA	< 0.004	mg/l	KLB	93.7	0.09	Grab	3
CHROMIUM	03/17	4:25 PM	NA	0.004	mg/l	KLB	98.5	1.12	Grab	3
COPPER	03/17	4:25 PM	NA	0.01	mg/l	KLB	97.7	0.45	Grab	3
LEAD	03/17	4:25 PM	NA	< 0.02	mg/l	KLB	101.7	2.56	Grab	3
NICKEL	03/17	4:25 PM	NA	< 0.004	mg/l	KLB	99.4	0.47	Grab	3
SILVER	03/17	4:25 PM	NA	< 0.003	mg/l	KLB	104.2	0.97	Grab	3
ZINC	03/17	4:25 PM	NA	0.020	mg/l	KLB	93.5	1.45	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 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>[Signature]</i>			CALIBRATION pH/DO# <i>62198</i>	PRESERVATIVES				
		DATE	TIME	GRAB		NaOH	HNO <sub>3</sub>			
INF	W=H2O									
CLAR	S=SLUDGE				pH			Cyanide		METALS
POND	D=SOIL									
BACKWASH	C=WELL									
EFF	W	<i>3/13/14</i>	<i>8:30</i>	<b>X</b>	<i>x 7.84</i>			<b>1-Q-P</b>		<b>1-Q-P</b>
# = number of bottles										
Relinquished by:										
Relinquished by:										

Q, L, H, G = Quart, Liter, Half Gallon, Gallon    P, G = Plastic, Glass

Received by: *[Signature]*    Date/Time: *3-13-14 11:00*