

Jamie Belcourt (adpce.ad)

From: Jamie Belcourt (adpce.ad)
Sent: Wednesday, May 10, 2023 1:49 PM
To: Justin Halford (jwh@twhenterprises.com)
Subject: TWH Enterprises' (Pretreatment ID ARP001054 & AFIN 32-00548) October 1, 2022 - April 1, 2023 Semiannual Pretreatment Report

Mr. Halford,

Thank you for submitting TWH Enterprises' (Pretreatment ID ARP001054 & AFIN 32-00548) October 1, 2022 - April 1, 2023 Semiannual Pretreatment Report. The report was received, reviewed and deemed complete with the reporting requirements in 40 CFR 403.12(e) and the Metal Finishing Standards in 40 CFR §433.17.

In regards to the report that was submitted, chromium was detected in the facility's effluent at 2.550 mg/L on March, 29, 2023. According to 40 CFR § 433.17(a), the maximum limit of chromium in effluent for any one (1) day is 2.77 mg/L. The detected level of chromium at the facility was close to exceeding the numerical limit within the regulation. In the event that this numerical limit is exceeded, 40 CFR 403.12(g)(2) states that if sampling performed by an Industrial User indicates a violation, *the User shall notify the Control Authority within 24 hours of becoming aware of the violation*. The User shall also *repeat the sampling and analysis and submit the results of the repeat analysis to the Control Authority within 30 days* after becoming aware of the violation.

If you have any questions or concerns, or if I can be of any assistance, please do not hesitate to reach out.

Regards,

Jamie Belcourt | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
Policy and Administration
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | c: 501.287.8714 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT



TWH ENTERPRISES, LLC

Phone: (870) 251.1200
Fax: (870) 251.1202
E-Mail: tw@twenterprises.com

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

April 20, 2023

ADEQ – Water Division
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Semi-Annual Report

To whom it may concern:

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: 10/01/22 **TO:** 04/01/23

(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: 10/1/22	Date: 4/1/23	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(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:3/29/2023	<0.02	2.550	0.209	<0.02	0.524	<0.02	0.251	<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.

(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 _____.

'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

President
OFFICIAL TITLE

4/20/23
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 (844) 318-7030

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 29, 2023 3:10 PM NSA

Collection Place: TANK - EFFLUENT / METALS

WATER ANALYSIS

Parameter	Date / Time Begin		Date / Time End	Results	Unit	Analyst	% Spike	Rel %	Sample Type	Ref #
pH	03/29	3:10 PM	NA	9.12	S.U.	NSA	NA	0.45	Grab	1
CYANIDE	04/07	8:30 AM	NA	> 0.01	mg/l	KLB	93.6	0.00	Grab	2
CADMIUM	04/03	10:13 AM	NA	< 0.02	mg/l	KLB	100.1	0.51	Grab	3
CHROMIUM	04/03	10:13 AM	NA	2.550	mg/l	KLB	100.2	2.16	Grab	3
COPPER	04/03	10:13 AM	NA	0.209	mg/l	KLB	100.8	1.16	Grab	3
LEAD	04/03	10:13 AM	NA	< 0.02	mg/l	KLB	98.8	1.91	Grab	3
NICKEL	04/03	10:13 AM	NA	0.524	mg/l	KLB	99.8	1.23	Grab	3
SILVER	04/03	10:13 AM	NA	< 0.02	mg/l	KLB	98.2	2.23	Grab	3
ZINC	04/03	10:13 AM	NA	0.251	mg/l	KLB	97.2	0.28	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-2011
2. SM 4500CN-E-2011
3. SM 3120 B-2011


 Neville Adams, Manager

