

Jamie Belcourt (adpce.ad)

From: Jamie Belcourt (adpce.ad)
Sent: Wednesday, November 9, 2022 2:43 PM
To: Justin Halford (jwh@twhenterprises.com)
Cc: Stacie Wassell (adpce.ad); Richard Healey (adpce.ad)
Subject: TWH Enterprises' (Pretreatment ID ARP001054 & AFIN 32-00548) April 1, 2022 – October 1, 2022 Semiannual Pretreatment Report
Attachments: 10-14-2022-----CIU_SAR_FORM_433.pdf

Mr. Halford,

Thank you for submitting TWH Enterprises' (Pretreatment ID ARP001054 & AFIN 32-00548) April 1, 2022 – October 1, 2022 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.

In regards to the submitted report (attached), sampling procedures and holding times on the chain of custody and analytical report documentation that was submitted could cause for concern. Specifically, the samples were collected on September 21, 2022 and were received in the laboratory for analysis on the same date. Analysis was not conducted for cyanide until September 30, 2022, and the remaining seven (7) analytes (cadmium, chromium, copper, lead, nickel, silver, and zinc) were analyzed on October 3, 2022. This is a period of nine (9) days for cyanide analysis and twelve (12) days for the other analytes, following sample collection.

In the future, please ensure that collected samples are analyzed as soon as possible to prevent potential instances of noncompliance with the procedures set forth in 40 C.F.R. Part 136. Noncompliance with 40 C.F.R. Part 136 may result in enforcement action.

Please reply to this email to let me know that you have received it.

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 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT



TWH ENTERPRISES, LLC

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E-Mail: twh@twhenterprises.com

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

October 14, 2022

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 faint, light-colored signature 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

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: 4/1/22 **TO:** 10/1/22

(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: 4/1/22	Date: 10/1/22	Type of Discharge
Regulated (Core & Cyanide)	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: 09/21/22	<0.02	0.178	<0.02	<0.02	0.067	<0.02	<0.02	<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.

Justin Halford
(Typed Name)


(Corporate Officer or authorized representative)

Date of Signature 11-08-2022

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

10/14/22
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.

TWH ENTERPRISES

Collection Date / Time: September 21, 2022 12:45 PM JMP
 Collection Place: TANK - EFFLUENT / METALS
 Collection Date / Time: September 21, 2022 12:45 PM JMP
 Collection Place: TANK - EFFLUENT / pH & CYANIDE

WATER ANALYSIS

Parameter	Date / Time		Results	Unit	Analyst	% Spike	Rel %	Sample Type	JMP
	Begin	End							Ref #
pH	09/21	12:45 PM	9.06	S.U.	JMP	NA	0.13	Grab	1
CYANIDE	09/30	9:59 AM	< 0.01	mg/l	KLB	92.0	0.00	Grab	2
CADMIUM	10/03	10:27 AM	< 0.02	mg/l	KLB	99.5	5.02	Grab	3
CHROMIUM	10/03	10:27 AM	0.178	mg/l	KLB	96.2	8.87	Grab	3
COPPER	10/03	10:27 AM	< 0.02	mg/l	KLB	90.0	4.24	Grab	3
LEAD	10/03	10:27 AM	< 0.02	mg/l	KLB	102.5	13.12	Grab	3
NICKEL	10/03	10:27 AM	0.067	mg/l	KLB	87.0	12.10	Grab	3
SILVER	10/03	10:27 AM	< 0.02	mg/l	KLB	96.9	5.92	Grab	3
ZINC	10/03	10:27 AM	< 0.02	mg/l	KLB	108.1	0.19	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-12011


 Neville Adams, Manager

Arkansas Testing Laboratories

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

CLIENT: TWH Enterprises						PARAMETERS					
SAMPLE ID EFF INF CLAR POND BACKWASH	SAMPLE MATRIX W=H2O S=SLUDGE D=SOIL C=WELL	SAMPLED BY: <i>JM</i>				CALIBRATION		PRESERVATIVES			
		DATE	TIME	GRAB	pH/DO#	NaOH	HNO ₃				
EFF	W	x 9/21	x 1245	X		x 906		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						
<i>JM</i>	<i>9/21/22 150</i>		<i>[Signature]</i>		<i>9/21/22 150</i>						
Relinquished by:	Date/Time		Received by:		Date/Time						
<i>JM</i>	<i>9/21/22 150</i>		<i>[Signature]</i>		<i>9/21/22 150</i>						

REC'D INTO THE LAB
[Signature] °C