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700 Pepsi Cola Road
Batesville, AR 72501
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March 30, 2010

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 40CFR413. 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 40CFR413

Use of this form is not an EPA/ADEQ requirement

Return to: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION

A. LEGAL NAME & MAILING ADDRESS

**TWH Enterprises, Inc.
700 Pepsi Cola Rd.
Batesville, AR 72501**

B. FACILITY & LOCATION ADDRESS

**TWH Enterprises, Inc.
700 Pepsi Cola Rd.
Batesville, AR 72501**

C. FACILITY CONTACT: **Justin Halford**

TELEPHONE NUMBER: **870-251-1200**

(2) REPORTING PERIOD--FISCAL YEAR From Mar 1 to Feb 28/29 (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

April & October

B. PERIOD COVERED BY THIS REPORT

FROM: **10/1/09** TO: **4/1/10**

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

Subparts

CHECK EACH APPLICABLE BLOCK:

- A - Electroplating Common Metals
- B - Electroplating Precious Metals
- C - [Reserved]
- D - Anodizing
- E - Coating
- F - Chemical Etching and Milling
- G - Electroless Plating
- H - Printed Circuit Board Manufacture

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

C. Number of Regular Employees at this Facility: 2

[Reserved]

(4) FLOW MEASUREMENT (CON'D)

B. INDIVIDUAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Type of Discharge	Date: 10/1/09	Date: 4/1/10
Regulated (Total)	Batch	Bi-Monthly @ 1000 gallons each	
Regulated (Cyanide)			
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary	Intermittent	Average 930 gallons per month	
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
- Complexation Destruction
- Cyanide Destruction
- Other DI Unit
- None

B. COMMENTS ON TREATMENT SYSTEM

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS ON THE EFFLUENT FROM ALL REGULATED PROCESSES (AFTER TREATMENT, IF APPLICABLE). THE USER MUST SAMPLE THE EFFLUENT ON THE SAME DAY WHEN THE FLOW IS MEASURED. THE DATE BELOW MUST MATCH THE DATE IN SECTION 4.B ABOVE. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

Pollutant (mg/l)	Cd	Cr	Cu	Pb	Ni	Zn	Tot Metals ¹	CN,T ²	CN,A ²	TTO ³
Max for 1 day	1.2	7.0	4.5	0.6	4.1	4.2	10.5	1.9	5.0	4.57 2.13
Monthly Ave	0.7	4.0	2.7	0.4	2.6	2.6	6.8	1.0	2.7	
Date: 3/3/10	0.034	0.100	0.090	.170	.900	<.005	1.299	<0.01	---	N/A
Date:										

Parameters in shaded blocks apply when the Regulated Process Flow in Section 4.B above exceeds 10,000 gal per calendar day.

¹Per 40CFR413.02(e) Tot Metals include Cr, Cu, Ni & Zn only.

²ADEQ present policy for cyanide monitoring for §413 CIUs is identical to §433 CIUs.

³Provide TTO total from lab report here or provided certification in Section 6.B below.

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. Cyanide Certification pending legislature

N/A
[Reserved]

B. CHECK ONE: REQUIRED TOXIC ORGANIC ANALYSIS ATTACHED TTO CERTIFICATION PROVIDED BELOW

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 Pollution Control and Ecology.

(Typed Name)

(Owner 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(1)]

I certify under penalty of law that I have personally examined and am familiar with the information in this semi-annual compliance report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

T.W. Halford Jr.

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

Vice President

OFFICIAL TITLE

3-30-2010

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: March 3, 2010

12:15 PM BET

WATER ANALYSIS

Collection Place: TANK - EFFLUENT

Parameter	Date / Time		Date / Time End	Results	Unit	Analyst	% Spike	Rel %	Sample Type	BET
	Begin									Ref #
pH	03/03	12:15 PM	NA	7.07	S.U.	BET	NA	0.26	Grab	1
CYANIDE	03/04	8:00 AM	NA	< 0.01	mg/l	BET	98.4	0.00	Grab	2
CADMIUM	03/08	12:00 PM	NA	0.034	mg/l	BET	98.4	1.03	Grab	3
CHROMIUM	03/08	12:15 PM	NA	0.10	mg/l	BET	96.4	2.11	Grab	3
COPPER	03/08	12:30 PM	NA	0.09	mg/l	BET	99.5	5.18	Grab	3
LEAD	03/08	12:45 PM	NA	0.17	mg/l	BET	99.9	8.33	Grab	3
NICKEL	03/08	1:00 PM	NA	0.90	mg/l	BET	99.9	5.13	Grab	3
SILVER	03/08	1:15 PM	NA	< 0.01	mg/l	BET	97.8	3.11	Grab	3
ZINC	03/08	1:30 PM	NA	< 0.005	mg/l	BET	99.0	3.08	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. SM 3111B


Neville Adams, Manager

Arkansas Testing Laboratories

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

CLIENT: TWH Enterprises						PARAMETERS				
SAMPLE ID	SAMPLE MATRIX	SAMPLED BY: <i>B. Temple</i>				CALIBRATION		PRESERVATIVES		
		DATE	TIME	GRAB	pH/DO#		NaOH	HNO ₃		
EFF INF CLAR POND BACKWASH	W=H2O S=SLUDGE D=SOIL C=WELL						pH		Cyanide	METALS
EFF	W	3-3-10	12:57	X			x7.07		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				

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