ADEQ

ARKANSAS
Department of Environmental Quality

May 6, 2013

Bad Boy Inc.,
Randel Davis
Paint Supervisor
102 Industrial Drive
Batesville, AR 72501

Re: ADEQ Pretreatment Compliance Assurance Visit at Bad Boy Inc. (ARP001027 and ARP001028) discharging to the City of Batesville (AR0020702)

Dear Mr. Davis,

On April 17, 2013 a compliance assurance visit (CAV) was conducted by ADEQ Pretreatment personnel to satisfy the requirements of the memorandum of agreement with EPA Region VI in ADEQ's Pretreatment Program implementation procedures to "randomly sample and analyze the effluent from [Bad Boy] and to conduct surveillance activities in order to identify, independent of information supplied by [Bad Boy] occasional and continuing noncompliance with pretreatment standards" [see 40 CFR 403.8(f)(2)(v)].

While Boy Boy has two separate processes and buildings for the manufacture of two end products (riding lawn mowers and multi-terrain vehicles [MTV]) this office will identify the two facilities as BB #1 (mower division) and BB #2 (MTV division) although their fabrication, laser cutting, assembly and powder coat painting aspects are similar and somewhat intertwined.

You will not find many differences between the two (2) attached CAVs for BB #1 and BB #2.

The site visit observations, sampling analysis and subsequent information gained indicated BB #1 and BB #2 are in compliance with the Federal Metal Finishing pretreatment standards for new sources in 40 CFR 433.17 although the sampling point at BB #2 is deemed inadequate.

Recommendations

1) Reconfigure the 3" PVC outlet pipe from BB #2's phosphatizing line. Because it is "elbowed" downward; its close proximity to the sumps' standing water level precluded grabbing a representative sample of only the wastewater being discharged from the regulated process (see Attachment A-1);
2) It would be prudent for Bad Boy to explore the possibility of batch discharging its regulated "work" tanks (#1, #3 and #5) more often than once approximately every six (6) months commingling it with their regulated phosphatizing rinse tanks discharge instead of hauling them off-site for disposal.

Based on the analyticals (see Attachment A-3) from your two (2) facilities' rinse wastewater indicating fairly low concentrations of pollutants Federally limited in the Metal Finishing category 40 CFR 433.17 the addition of the three (3) work tanks' wastewater may not appreciably increase the concentrations in the combined wastestream. The combined wastestream(s) may very well remain compliant with the Federal limitations in 40 CFR 433.17.

With the City's approval Bad Boy could possibly avoid the costs of hauling the "work" tanks contents off-site and blend them with the continual discharge of the regulated rinse wastewater on a more frequent time basis and still remain compliant with the Federal limitations.

This office wishes to extend its sincere appreciation to you and your staff for the transparent exchange of information and dialogue during the visit. Your non-adversarial attitude, willingness to "open the books"; sharing of process knowledge and cooperation compliments the true spirit of environmental partnerships.

Attached you'll find the completed narrative compliance assurance visits' checklists and ADEQ's analysis of the wastewater discharged during the day of this office's visit.

If this office has misrepresented any part of the checklist items please advise as a few items were only cursorily discussed because of the time constraints on the day of the CAV.

Sincerely,

Allen Gilliam

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

Attachments: BB #1 and BB #2 4/17/13 Compliance Assurance Site Visit Forms
BB #2 and BB #1 sampling points' pictures
ADEQ's Certificate of Analysis from samples taken at BB #1 and BB #2 on 4/17/13

ec: Eugene Townsley, Batesville Wastewater Manager
Mike McDaniel, Batesville Pretreatment Coordinator
Craig Uyeda, NPDES Enforcement Branch Manager
Rudy Molina, EPA Region 6 Pretreatment Coordinator

ADEQ Pretreatment Industrial Inspection

Facility Information

Facility Name: Bad Boy Inc. #1 (Riding Mowers facility)	Site Address: 102 Industrial Dr. Batesville, AR 72501
Signatory Authority: Randel Davis – Paint Shop Supervisor	
Phone: 1.870.307.7515	Mailing Address (if different): same
Cell: 870. 612.0350	
Fax: 1.870.698.2123	Corporate Owner Name and address:
Address: same	See below
Contact Person: Randel Davis	
	Phone: 1.870.612.0090
Phone: same	Fax: same
Fax: same	Corporate Owners: Phillip Pulley & Robert Foster
e-mail: Randel.davis@badboymowers.com	e-mail:
Facility Tracking #ARP001027; AFIN # 3200530	**Last Inspection Date:** This will be the 1st CAV
POTW (City) IU discharges to: Batesville, AR	POTW's NPDES #AR0020702
Industrial Classification: ☒ Categorical – Metal Finisher ☐ Significant	
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 433.17	
When did this industry begin discharging to the POTW? 2/01/07	

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Comments :

Inspector's Name (Print): Allen Gilliam	Signature: Allen Gilliam
IU Rep's Name (Print):	Signature: Randel Davis
Date and Time Inspection Ended: 4/17/13 @ 12:45 p.m	

I. Summary of Inspection

A. Inspection and Objective (Complete Before Inspection)

☐ Permit Renewal	☒ Bi-Annual	☐ Spill/Slug	☐ Unscheduled
☐ New Construction	☐ Noncompliance	☐ Follow-up	☐ Complaint

Inspection Objective(s): Compliance assurance visit with sampling to implement the Federal Pretreatment Regulations in 40 CFR 403.8(f)(2)(v) and more specifically to verify compliance with the Federal Metal Finishing Pretreatment limitations in 40 CFR 433.17 (Pretreatment Standards for New Sources – PSNS).

Checklist of items to be reviewed and/or visually inspected:

☒ Pre-inspection Meeting	☒ Permit Conditions (City's)	☒ Safety Concerns
☒ Process Inspection	☐ Pretreatment System	☐ TOMP (one not submitted as yet)
☒ Chemical Storage	☒ Discharge point(s)	☒ Spills/Slug Control Plan
☒ Records Review	☐ RCRA information	☒ Process/Flow~~/Pretreatment Schematics~~
☒ IU sampling procedures	☒ Flow/pH Meter(s)	☒ Calibration Records
☐ MSDS Inventory List	☐ New MSDS	☒ P2, BMPs, EMS, etc.

Comments: Some chems' MSDS included with BMR (dated 6/26/12) submitted to ADEQ. Time constraints did not allow for a full review of the facility's entire MSDS.

B. Inspection Analysis

Were there any deficiencies/violations identified and noted during the inspection? ☐ Yes ☒ No

Provide a brief narrative of deficiencies/violations or other concerns in the following areas:

Records Review: Adequate, no comment.

Process Area(s): Adequate, no comment.

Pretreatment System: N/A

Self-Monitoring Procedures: For this type of regulated process wastewater (homogeneous) the grab sampling procedures are adequate.

Accidental discharge/Slug Control Plan: Slug discharge potential deemed negligible.

Sampling Point: Adequate for this type of process, but leaning over on one hand and knees to reach out and grab samples at ground level should be rectified to include an extension pole (non-metallic) with a gimbaled end to hold the sample bottle(s). (See Attachment A-2)

Chemical Storage: Adequate, no comment.

II. Pre-Inspection Meeting	
A. General Information	
Date and Time Inspection Started: 4/17/13 @ 9:15 a.m.	SIC/NAICs code(s): 3524 / 33635
IU Reps/Titles: Randel Davis / Paint Supervisor	ADEQ Reps/Titles:
Wes Bramlett, FTN Associates, consultant professional engineer to Bad Boy Inc.	Allen Gilliam/State Pretreatment Coordinator
	City Reps/Titles: Eugene Townsley, City Wastewater Superintendent
	Mike McDaniel, City Pretreatment Coordinator
End product(s): Riding lawn mowers	Approx. # of units produced/yr: ~ 230 riding lawn mowers and Multi-Terrain Vehicles
Days of Operation: Monday through Friday	Days of Production (if different): same
Hours of Operation: 16	Hours of Production (if different): same
"Staggered" hr. Shifts #1 & #2: 4:30 a.m. to 10:00 p.m.	Shift3 hrs: N/A
Total Bad Boy # of Employees: 375 | Peak Months: November thru June	"Off" Months: July thru October
Are there any scheduled plant shutdowns? Yes ☐ No ☒ N/A ☐ If yes, when?	
Are there designated plant clean-up days? Yes ☐ No ☒ N/A ☐ If yes, when?	
Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes ☒ **No** ☐	
If **No**, explain:	
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes ☒ No ☐	
If Yes, explain: An authorized rep would have to check in as a visitor and have an authorized company rep escort them to the sampling point and tour of facility operations.	
Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: Yes ☒ No ☐	
If Yes, explain: Safety glasses required.	
Has there been any changes since the last inspection regarding the following items: N/A since this the first compliance assurance visit.	
Plant/flow/process layout? Yes ☐ No ☐ If yes, obtain copy of updated schematic for facility file.	
Processes? Yes ☐ No ☐ If yes, explain:	
Production Levels? Yes ☐ No ☐ If yes, explain:	
Raw materials? Yes ☐ No ☐ If yes, explain:	
Flow rates? Yes ☐ No ☐ If yes, explain	
Are regulated and non-regulated wastestreams combined? yes ☐ no ☒	
Prior to Pretreatment System? yes ☐ no ☐ N/A ☒	
If Yes, was the CWF used to calculate limits? yes ☐ no ☐ N/A ☒	
Prior to connection to the POTW sanitary sewer? yes ☐ no ☐ N/A ☒	
.	

B. Facility Permits		
ADEQ Permit Type	Permit No.	Expiration Date
Pretreatment Tracking #	ARP001027	N/A
RST Facility #	32001679	7/31/13

C. Additional Comments

(Note which section or attachment comments are regarding)

Attachment A: Industrial Process(es): It will be recommended to blend their 3 "work" tanks wastewater (currently being sent to a storage tank and hauled off-site ~ twice/yr) with the continual rinse waters from their regulated process of phosphatizing.

This inspector can see no reason why the two (2) wastestreams cannot be discharged together to the City as long as the Metal Finishing limitations in 40 CFR 433.17 are met. This would negate their current practice of hauling the "work" tanks wastewater off-site for disposal.

Attachment A: Industrial Process(es)

List process(es) generating wastewater. Note whether it is subject to Federal Pretreatment Standards

1. Conversion coating: Phosphatizing	Yes ☒ No ☐	3.	Yes ☐ No ☐
2. Ancillary operations (acid descale bath and rinses)	Yes ☒ No ☐	4.	Yes ☐ No ☐

Were processes visually inspected? Yes ☒ No ☐

Brief description of process(es): Welding, laser cutting and some final shaping is made to raw material brought in. Most raw material is preformed cold rolled steel which is further processed through a typical five stage phosphatizing operation prior to powder coating. The 1st stage is a heated acidic descaler spray followed by a fresh water rinse. The 3rd stage is the heated phosphatizing stage which captures them under the core operation of conversion coating in 40 CFR 433.17. It's followed by another fresh water rinse. The final (5th) stage is a corrosion preventative spray. Parts are sent through a dry off oven then to the powder coat room. After powder coating, the workpieces are sent through a "bake oven" for final curing of paint. In a separate room, workpieces are final assembled into a complete riding mower, filled with hydraulic, gear and engine oil and fuel ready for shipment. Counter current flows are utilized for make-up water from the 2nd and 4th fresh water rinse stages back to stages 1 and 3 respectively.

The two (2) facilities' cleaning, phosphatizing and corrosion preventative spray booths are the same (with the same chemicals) except the Multi-Terrain Vehicle facility's tanks hold a little more volume.

General observations of facility's indoor housekeeping: Clean and orderly.

General observations of area outside facility's building: Uncluttered with no evidence of an illegal direct discharge.

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured or estimated. If batch discharged, list frequency and volume (1000 gal/month, e.g.).

☒ Process Rinse Overflows ~7,770 gpd	☐ Equip. Cleanup	☐ Floor Cleanup	☒ Spent Bath Solutions Shipped off-site for disposal
☐ Product Cleaning	☐ Forklifts Maint./Wash	☒ Tank Dragout Too small to measure	☐ Air Pollution Devices
☐ Boiler Blowdown	☐ Spent Rinse Tanks	☐ Equipment Coolants	☐ Non-Contact Cooling Water

List Major Raw Materials and Chemicals used/on-site: Preformed cold rolled steel, sulfuric/phosphoric acid (descale/acid cleaner stage #1); nitric/hydrofluoric/phosphoric acid (Eco-Treat stage #3); corrosion preventative – unspecified chems on MSDS (Cor Rinse stage #5); hydraulic, engine and gear oils and fuel blends.

Check Waste Stream Pollutants of Concern from Process(es)

☒ CN	☒ Metals: All from 40 CFR 433.17	☒ Solvents: All toxic organics listed in 40 CFR 433.11 (no Toxic Organic Management Plan submitted as yet)
☒ pH	☐	☐

Are there floor drains in the Process area? ☐ Yes ☒ No If yes list number and the location of all floor drains:

Attachment B: Pollution Prevention (P2) / Recycling Activities		
Does the facility have a written P2 Plan?	Yes ☐	No ☒ Not a written "Plan".
Does this facility practice P2?	Yes ☒	No ☐
Environmental Management System in place?	Yes ☐	No ☒
ISO 140001 Certified?	Yes ☐	No ☒ Although they're "European certified"
Written Standard Operating Procedures?	Yes ☒	No ☐
Explain: Step-by-step procedures in a 3 – ring notebook for the phosphatizing line.		
Preventative Maintenance Program	Yes ☐	No ☒ (hydraulic systems, valves, pumps, etc)
Explain: On as needed basis especially during slow production periods.		
Water Reuse:	Yes ☒	No ☐
Explain: Counter-current flows from rinses back to baths for make-up water in previous acid baths. See above process description.		
Cost Accounting to Track Savings:	Yes ☒	No ☐
Explain: They conduct forecast planning.		
Inventory Control / "Green Purchasing":	Yes ☒	No ☐ (lean manufacturing/"green purchasing", etc)
Explain: They conduct forecast planning.		
Employee Training:	Yes ☒	No ☐
Explain: For each station, there is employee training on proper procedures.		
Spent Solvent Reclamation?	Yes ☐	No ☐ N/A ☒
Explain:		
Recycle Paper, Aluminum, Boxes, and Pallets?	Yes ☒	No ☐
Explain: Scrap metal too.		
Recycle Waste Oil, Solvents, and Lubricants?	Yes ☒	No ☐
Explain: They re-use waste oil from the MTV and mower service shop(s) for heating during the winter.		
Other Activities:		
P2 Equipment/Practices in use:		

☒ Overflow Alarms (in sump)	☐ Aqueous Cleaning Solutions
☐ Fog Spray Rinsing	☒ Countercurrent Rinsing
☐ Dragout Collection Trays	☐ Seal-Less Pumps
☒ Air Curtain to retain heat in dry-off and curing ovens	☐ Secondary Containment of Process Solutions
☐ Aqueous Paint Stripping Solutions	☐ Bead Blasting to Remove Paint
☒ Recycled de-I cooling water for laser cutting	☐ Recycle Overspray
☐ In-Process Recycle (Ion Exchange, Reverse Osmosis)	☒ Conductivity Meters
☐ Dead Rinse Tanks	☐ Bath / Rinse Filtration (in-situ)

Attachment C: Pretreatment System (*Pretreatment not necessary to meet Metal Finishing limitations)*				
Are wastestreams segregated before pretreatment?	☐ Yes	☐ No	☒ N/A	
Are they pretreated prior to discharge to the sanitary sewer?	☐ Yes	☐ No	☒ N/A	
Was the pretreatment system visually inspected during this visit?	☐ Yes	☐ No	☒ N/A	
Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:				
☒ pH Adjustment	☐ Sand Trap	☐ Sedimentation	☐ Silver Recovery	
Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order): **No pretreatment is necessary to meet the Metal Finishing limitations in 40 CFR 433.17.**				
Does the description match the schematic currently on file?	☐ Yes	☐ No	☒ N/A	
System Operator Name(s):				
Does discharge permit require licensed operator?	☐ Yes	☐ No	☒ N/A	
Is the System Operator(s) licensed by the State of Arkansas?	☐ Yes	☐ No	☒ N/A	
List Name(s) and License classification:				
Is training provided to the Pretreatment System Operator(s)?	☐ Yes	☐ No	☒ N/A	
If Yes, list type and frequency: Not discussed.				
Is the discharge from the Process ☐ Batch ☒ Continuous ☐ Combination				
If any discharges are batch type or combination, describe the following: N/A				
Volume of discharge: ~7,770 gallons per day. Only rinse tanks 2 and 4 are continually discharged. Stages 1 (de-scaler; 1,500 gallons), 3 (phosphatizing; 900 gallons) and 5 (corrosion inhibitor; 750 gallons) are stored in an on-site tank. This storage tank is pumped for off-site disposal ~ twice/yr.				
Describe process from which batch originated (spent bath, e.g.): N/A				
~~Approximate duration of batch discharge:~~				
~~Meter Type~~	~~Calibration Procedure and Frequency~~	~~Comments (Totalizer Reading)~~		
With approval from and witnessed by the City reps, the facility used a 5 gallon bucket and stop watch to estimate daily flows.				

Attachment D: Chemical Storage Area(s)		
Does the facility have a designated chemical storage area(s)? ☒Yes ☐No		
Was this area(s) visually inspected? ☒Yes ☐No ☐N/A (distant assembly room not extensively inspected, only process wastewater generating area focused on)		
Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. A barrel per each work tank of the phosphatizing line was sitting on a drum pallet	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2. Very little overstock of phosphatizing line stored in a shelved/protected area.	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
3. Fuel and various oils are kept in a separate building where final assembly and service is conducted.	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
4. A small amount of chain/conveyor lube oil is pumped from a small rectangular container to the above spray nozzles on conveyor line ~ every 4 hrs. Any drippage at that point is simply caught on an oil-sorb mat.	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
Does the Chemical Storage Area(s) contain any of the following?		
☐ Dikes, Berms for Containment	☐ Plugs for Floor Drains	
☐ Secondary Tanks for Holding	☐ Premix (low) Concentrations	
☐ Alarms	☐ Chain restraints, limited access	
☒ Spills Control Kits for Cleanup	☐ Notification Procedures	
☐ Chemical desegregation within Storage Area	☐ Other	
Chemical Inventory List (MSDS) on file? ☒Yes ☐No ☐N/A		
Time constraints did not allow for a comprehensive review of the facility's entire MSDS book.		
Were any new MSDS reviewed during the Inspection? ☐Yes ☐No ☒N/A		
Chemical storage comments: Adequate, no comment.		
Chemical handling procedures (totes, dolly, buckets, hardline, etc): They use rolling pallet "jacks" to transfer barrels from the loading dock to the main storage area; then to the individual stations.		
Hazardous waste chemical handling procedures (properly sealed containers, labeled, manifests, etc): N/A		

Attachment E: Accidental discharge/Slug Control Plan	
Does the facility have an accidental discharge/Slug control plan? Slug discharge potential deemed negligible.	☐ yes ☒ no
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	☐ yes ☐ no ☒ N/A
(A) Describes discharge practices including non routine batch (slug) discharges	☐ yes ☐ no ☒ N/A
(B) Describes storage and handling of chemicals	☐ yes ☐ no ☒ N/A
(C) Procedures for immediate notification to POTW of slug discharges	☐ yes ☐ no ☒ N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	☐ yes ☐ no ☒ N/A
2. Describes procedures and equipment for emergency response	☐ yes ☐ no ☒ N/A
3. Describes follow-up to limit damage suffered by POTW or environment	☐ yes ☐ no ☒ N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☒ no ☐ N/A
Are they posted in areas where chemicals are used and stored?	☐ yes ☐ no ☒ N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	☒ yes ☐ no ☐ N/A
This is part of their "apprenticeship" program.	
Has there been any non-routine, episodic chemical spills discharged to the City in the past year?	☐ yes ☒ no
(Briefly Describe, Include Dates) N/A	
Was the City notified of these occurrences? ☐ yes ☐ no ☒ N/A	
Visual Inspection of Discharge Lines/Points	
Sampling / Monitoring Point: Relatively clean; 3" PVC pipe slightly extending into an in-ground (~ 4' diameter fiberglass X 6' deep) sump which is between stages 4 and 5 of phosphatizing line.	
Total Flow Monitoring Point: 5 gallon bucket test with stop watch.	
Upstream Manhole: N/A	
Point of Connection: Sump pump from above sampling point "kicks-in" when sump level reaches a certain volume which drains the sump to the City at fairly frequent intervals.	

Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title. This inspector had to get on one hand and knees holding sample bottle under discharge pipe. Dangerous situation if one lost their balance and fell into this ~6' deep sump. A non-metallic extension pole needs to be used to more easily/safely take grab samples.

Where is the sample point located?

☒ End of Process	☐ Pretreatment Effluent	☐ Total Flow
☐ Combined Flow	☐ Metered Flow	☐ Flow Actuator
☐ Private Manhole	☐ Utility Manhole	☐ Advance Notice Required

Is the Sample Collection Site Adequate?	☒ Yes ☐ No ☐ N/A
Does the facility rep. request a split sample on this sampling/inspection?	☐ Yes ☒ No
Does the facility perform self-monitoring tests in-house?	☐ Yes ☒ No ☐ N/A

If no, record the name and address of Contract Lab: American Testing Labs (Metals), 3301Langley Dr., Searcy, AR; American Interplex (Toxic Organics), 8600 Kanis Road, Little Rock, AR

Automatic Sampler ☐ or Manual ☒

IU Self-Monitoring Results reviewed: (from initial 6/26/12 BMR and two (2) semi-annual reports)	☒ Yes ☐ No ☐ N/A
Is the Contract Lab certified by ADEQ for test parameters?	☒ Yes ☐ No ☐ N/A
Dates and Times of Sample Analysis Recorded?	☒ Yes ☐ No ☐ N/A
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
EPA recommended holding times being met (Refer to 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
Chain of Custody Records for Self-Monitoring Samples Reviewed	☐ Yes ☒ No ☐ N/A *incomplete*
Were correct Sample Types Collected	☐ Yes ☒ No ☐ N/A *unknown*
Dates and times of Sample Collection Recorded?	☒ Yes ☐ No ☐ N/A
Were Samples preserved correctly (refer to 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
Were Self Monitoring records on file for past 3 years?	☐ Yes ☐ No ☒ N/A Facility just began semi-annual reporting

Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433

How does the IU comply with the TTO requirements? ☒ Analysis ☐ Certification Statement

Does the facility have a Toxic Organic Management Plan? ☐ Yes ☒ No ☐ N/A

If yes, Does the plan show how toxic organics are used, stored, and disposed? ☐ Yes ☐ No ☒ N/A

List the date of the last revision to the TOMP: N/A

Is the TOMP being followed as written? ☐ Yes ☐ No ☒ N/A Toxic Organic Management Plan yet to be submitted

If no, is there evidence that a TOMP is needed? ☐ Yes ☒ No ☐ N/A (If yes, provide description of evidence in comments.)

Comments: Initial TTO scans submitted with their 6/26/12 BMR; 1/9/13 and 6/13 periodic reports indicated non-detects for all toxic organics.

ADEQ Pretreatment Industrial Inspection

Facility Information

Facility Name: Bad Boy Inc. #2 (Multi-Terrain Vehicles facility)	Site Address: #1 Bad Boy Blvd. Batesville, AR 72501
Signatory Authority: Randel Davis – Paint Shop Supervisor	
Phone: 1.870.307.7515	Mailing Address (if different): 102 Industrial Blvd. Batesville, AR 72501
Cell: 870.612.0350	
Fax: 1.870.698.2123	Corporate Owner Name and address:
Address: same	See below
Contact Person: Randel Davis	
	Phone: 1.870.612.0090
Phone: same	Fax: same
Fax: same	Corporate Owners: Phillip Pulley & Robert Foster
e-mail: Randel.davis@badboymowers.com	e-mail:
Facility Tracking #ARP001028; AFIN # unknown	**Last Inspection Date:** This will be the 1st CAV
POTW (City) IU discharges to: Batesville, AR	POTW's NPDES #AR0020702
Industrial Classification: ☒ Categorical – Metal Finisher ☐ Significant	
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 433.17	
When did this industry begin discharging to the POTW? 1/14/13	

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IU Rep's Name (Print):	Signature: Randel Davis
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☐ New Construction	☐ Noncompliance	☐ Follow-up	☐ Complaint

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☒ Records Review	☐ RCRA information	☒ Process/Flow~~/Pretreatment Schematics~~
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☐ MSDS Inventory List	☐ New MSDS	☒ P2, BMPs, EMS, etc.

Comments: Some chems' MSDS included with BMR (dated 6/26/12) submitted to ADEQ. Time constraints did not allow for a full review of the facility's entire MSDS.

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Provide a brief narrative of deficiencies/violations or other concerns in the following areas:

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Process Area(s): Adequate, no comment.

Pretreatment System: N/A

Self-Monitoring Procedures: For this type of regulated process wastewater (homogeneous) the grab sampling procedures are adequate.

Accidental discharge/Slug Control Plan: Slug discharge potential deemed negligible.

Sampling Point: Sampling point was deemed inadequate. The sampling port (3" PVC pipe "elbowed" down) is very near the sump's stagnant fluid level. Sample bottles can only be submerged into the mix of stagnant sump water and process wastewater as it is discharged. This may or may not be a problem with meeting limits, but any TSS build-up in the sump would skew the process wastewater results. (See attached picture A-1)

Chemical Storage: Adequate, no comment.

II. Pre-Inspection Meeting		
A. General Information		
Date and Time Inspection Started: 4/17/13 @ 8:00 a.m.		SIC/NAICs code(s): 3524 / 333112
IU Reps/Titles: Randel Davis / Paint Supervisor		ADEQ Reps/Titles:
Wes Bramlett, FTN Associates, consultant professional engineer to Bad Boy Inc.		Allen Gilliam/State Pretreatment Coordinator
		City Reps/Titles: Eugene Townsley, City Wastewater Superintendent
		Mike McDaniel, City Pretreatment Coordinator
End product(s): Multi-Terrain Vehicles		Approx. # of units produced/yr: ~ 230 riding lawn mowers and Multi-Terrain Vehicles
Days of Operation: Monday through Friday		Days of Production (if different): same
Hours of Operation: 8		Hours of Production (if different): same
Shift 1, hrs: 7:30 a.m. to 1:30 p.m.	Shift 2, hrs: N/A.	Shift 3, hrs: N/A.
Total Bad Boy # of Employees: 375	Peak Months: not mentioned	"Off" Months:
Are there any scheduled plant shutdowns? Yes ☐ No ☒ N/A ☐ If yes, when?		
Are there designated plant clean-up days? Yes ☐ No ☒ N/A ☐ If yes, when?		
Is the facility currently in compliance with all pretreatment reporting requirements and limits? Yes ☒ **No** ☐		
If **No**, explain:		
Are there any Special Entry Procedures for the Discharge/Sample point locations? Yes ☒ No ☐		
If Yes, explain: An authorized rep would have to check in as a visitor and have an authorized company rep escort them to the sampling point and tour of facility operations.		
Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: Yes ☒ No ☐		
If Yes, explain: Safety glasses required.		
Has there been any changes since the last inspection regarding the following items: N/A since this the first compliance assurance visit.		
Plant/flow/process layout? Yes ☐ No ☐ If yes, obtain copy of updated schematic for facility file.		
Processes? Yes ☐ No ☐ If yes, explain:		
Production Levels? Yes ☐ No ☐ If yes, explain:		
Raw materials? Yes ☐ No ☐ If yes, explain:		
Flow rates? Yes ☐ No ☐ If yes, explain		
Are regulated and non-regulated wastestreams combined?	yes ☐	no ☒
Prior to Pretreatment System?	yes ☐	no ☐ N/A ☒
If Yes, was the CWF used to calculate limits?	yes ☐	no ☐ N/A ☒
Prior to connection to the POTW sanitary sewer?	yes ☐	no ☐ N/A ☒
.		

B. Facility Permits		
ADEQ Permit Type	Permit No.	Expiration Date
Pretreatment Tracking #	ARP001028	N/A

C. Additional Comments

(Note which section or attachment comments are regarding)

Attachment A: Industrial Process(es): It will be recommended to blend their 3 "work" tanks wastewater (currently being sent to a storage tank and hauled off-site ~ twice/yr) with the continual rinse waters from their regulated process of phosphatizing.

This inspector can see no reason why the two (2) wastestreams cannot be discharged together to the City as long as the Metal Finishing limitations in 40 CFR 433.17 are met. This would negate their current practice of hauling the "work" tanks wastewater off-site for disposal.

Attachment A: Industrial Process(es)

List process(es) generating wastewater. Note whether it is subject to Federal Pretreatment Standards

1. Conversion coating: Phosphatizing	Yes ☒ No ☐	3.	Yes ☐ No ☐
2. Ancillary operations (acid descale bath and rinses)	Yes ☒ No ☐	4.	Yes ☐ No ☐

Were processes visually inspected? Yes ☒ No ☐

Brief description of process(es): Welding and some final shaping is made to raw material brought in. Most raw material is preformed cold rolled steel which is further processed through a typical five stage spray booth phosphatizing operation prior to powder coating. The 1st stage is a heated acidic descaler spray followed by a fresh water rinse. The 3rd stage is the heated phosphatizing stage which captures them under the core operation of conversion coating in 40 CFR 433.17. It's followed by another fresh water rinse. The final (5th) stage is a corrosion preventative spray. Parts are sent through a dry off oven then to the powder coat room. After powder coating, the workpieces are sent through a "bake oven" for final curing of paint. In a separate room, workpieces are final assembled into a complete multi-terrain vehicle, filled with hydraulic, gear and engine oil and fuel ready for shipment. Counter current flows are utilized for make-up water from the 2nd and 4th fresh water rinse stages back to stages 1 and 3 respectively.

The two (2) facilities' cleaning, phosphatizing and corrosion preventative spray booths are the same (with the same chemicals) except the Multi-Terrain Vehicle facility's tanks hold a little more volume.

General observations of facility's indoor housekeeping: Clean and orderly.

General observations of area outside facility's building: Uncluttered with no evidence of an illegal direct discharge.

Check all sources of wastewater being discharged into the City's collection system. Indicate avg. gal/day, measured or estimated. If batch discharged, list frequency and volume (1000 gal/month, e.g.).

☒ Process Rinse Overflows ~5,040 gpd	☐ Equip. Cleanup	☐ Floor Cleanup	☒ Spent Bath Solutions Shipped off-site for disposal
☐ Product Cleaning	☐ Forklifts Maint./Wash	☒ Tank Dragout Too small to measure	☐ Air Pollution Devices
☐ Boiler Blowdown	☐ Spent Rinse Tanks	☐ Equipment Coolants	☐ Non-Contact Cooling Water

List Major Raw Materials and Chemicals used/on-site: Preformed cold rolled steel, sulfuric/phosphoric acid (descale/acid cleaner stage #1); nitric/hydrofluoric/phosphoric acid (Eco-Treat stage #3); corrosion preventative – unspecified chems on MSDS (Cor Rinse stage #5); hydraulic, engine and gear oils and fuel blends.

Check Waste Stream Pollutants of Concern from Process(es)

☒ CN	☒ Metals: All from 40 CFR 433.17	☒ Solvents: All toxic organics listed in 40 CFR 433.11 (no Toxic Organic Management Plan submitted as yet)
☒ pH	☐	☐

Are there floor drains in the Process area? ☐ Yes ☒ No If yes list number and the location of all floor drains:

Attachment B: Pollution Prevention (P2) / Recycling Activities		
Does the facility have a written P2 Plan?	Yes ☐	No ☒ Not a written "Plan".
Does this facility practice P2?	Yes ☒	No ☐
Environmental Management System in place?	Yes ☐	No ☒
ISO 140001 Certified?	Yes ☐	No ☒ Although they're "European certified".
Written Standard Operating Procedures?	Yes ☒	No ☐
Explain: Step-by-step procedures in a 3 – ring notebook for the phosphatizing line.		
Preventative Maintenance Program	Yes ☐	No ☒ (hydraulic systems, valves, pumps, etc)
Explain: On as needed basis especially during slow production periods.		
Water Reuse:	Yes ☒	No ☐
Explain: Counter-current flows from rinses back to baths for make-up water in previous acid baths. See above process description.		
Cost Accounting to Track Savings:	Yes ☒	No ☐
Explain: They conduct forecast planning.		
Inventory Control / "Green Purchasing":	Yes ☒	No ☐ (lean manufacturing/"green purchasing", etc)
Explain: They conduct forecast planning.		
Employee Training:	Yes ☒	No ☐
Explain: For each station, there is employee training on proper procedures.		
Spent Solvent Reclamation?	Yes ☐	No ☐ N/A ☒
Explain:		
Recycle Paper, Aluminum, Boxes, and Pallets?	Yes ☒	No ☐
Explain: Scrap metal too.		
Recycle Waste Oil, Solvents, and Lubricants?	Yes ☒	No ☐
Explain: They re-use waste oil from the MTV and mower service shop(s) for heating during the winter.		
Other Activities:		
P2 Equipment/Practices in use:		

☒ Overflow Alarms (in sump)	☐ Aqueous Cleaning Solutions
☐ Fog Spray Rinsing	☒ Countercurrent Rinsing
☐ Dragout Collection Trays	☐ Seal-Less Pumps
☒ Air Curtain to retain heat in dry-off and curing ovens	☐ Secondary Containment of Process Solutions
☐ Aqueous Paint Stripping Solutions	☐ Bead Blasting to Remove Paint
☒ Recycled de-I cooling water for laser cutting	☐ Recycle Overspray
☐ In-Process Recycle (Ion Exchange, Reverse Osmosis)	☒ Conductivity Meters
☐ Dead Rinse Tanks	☐ Bath / Rinse Filtration (in-situ)

Attachment C: Pretreatment System (*Pretreatment not necessary to meet Metal Finishing limitations)*			
Are wastestreams segregated before pretreatment?	☐ Yes	☐ No	☒ N/A
Are they pretreated prior to discharge to the sanitary sewer?	☐ Yes	☐ No	☒ N/A
Was the pretreatment system visually inspected during this visit?	☐ Yes	☐ No	☒ N/A
Check which of the following are utilized for pretreatment prior to discharge to sanitary sewer:			
☒ pH Adjustment	☐ Sand Trap	☐ Sedimentation	☐ Silver Recovery
Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order): **No pretreatment is necessary to meet the Metal Finishing limitations in 40 CFR 433.17.**			
Does the description match the schematic currently on file?	☐Yes	☐No	☒N/A
System Operator Name(s):			
Does discharge permit require licensed operator?	☐ Yes	☐ No	☒ N/A
Is the System Operator(s) licensed by the State of Arkansas?	☐ Yes	☐ No	☒ N/A
List Name(s) and License classification:			
Is training provided to the Pretreatment System Operator(s)?	☐ Yes	☐ No	☒ N/A
If Yes, list type and frequency: Not discussed.			
Is the discharge from the Process ☐ Batch ☒ Continuous ☐ Combination			
If any discharges are batch type or combination, describe the following: N/A			
Volume of discharge: ~5,040 gallons per day. Only rinse tanks 2 and 4 are continually discharged. Stages 1 (de-scaler; 1,500 gallons), 3 (phosphatizing; 1,125 gallons) and 5 (corrosion inhibitor; 940 gallons) are stored in an on-site tank. This storage tank is pumped for off-site disposal ~ twice/yr.			
Describe process from which batch originated (spent bath, e.g.): N/A			
~~Approximate duration of batch discharge:~~			
~~Meter Type~~	~~Calibration Procedure and Frequency~~	~~Comments (Totalizer Reading)~~	
With approval from and witnessed by the City reps, the facility used a 5 gallon bucket and stop watch to estimate daily flows.			

Attachment D: Chemical Storage Area(s)		
Does the facility have a designated chemical storage area(s)? ☒Yes ☐No		
Was this area(s) visually inspected? ☒Yes ☐No ☐N/A (distant assembly room not extensively inspected, only process wastewater generating area focused on)		
Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. A barrel per each work tank of the phosphatizing line was sitting on a drum pallet.	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2. Very little overstock of phosphatizing line stored in a shelved/protected area.	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
3. Fuel and various oils are kept in a separate building where final assembly and service is conducted.	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
4. A small amount of chain/conveyor lube oil is pumped from a small rectangular container to the above spray nozzles on conveyor line ~ every 4 hrs. Any drippage at that point is simply caught on an oil-sorb mat.	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
Does the Chemical Storage Area(s) contain any of the following?		
☐ Dikes, Berms for Containment	☐ Plugs for Floor Drains	
☐ Secondary Tanks for Holding	☐ Premix (low) Concentrations	
☐ Alarms	☐ Chain restraints, limited access	
☒ Spills Control Kits for Cleanup	☐ Notification Procedures	
☐ Chemical desegregation within Storage Area	☐ Other	
Chemical Inventory List (MSDS) on file? ☒Yes ☐No ☐N/A		
Time constraints did not allow for a comprehensive review of the facility's entire MSDS book.		
Were any new MSDS reviewed during the Inspection? ☐Yes ☐No ☒N/A		
Chemical storage comments: Adequate, no comment.		
Chemical handling procedures (totes, dolly, buckets, hardline, etc): They use rolling pallet "jacks" to transfer barrels from the loading dock to the main storage area; then to the individual stations.		
Hazardous waste chemical handling procedures (properly sealed containers, labeled, manifests, etc): N/A		

Attachment E: Accidental Discharge/Slug Control Plan	
Does the facility have an accidental discharge/Slug control plan? Slug discharge potential deemed negligible.	☐ yes ☒ no
If yes are the following: 403.8(f)(2)(v)(A-D) requirements in place?	
Is the spill/slug control plan <2 years old?	☐ yes ☐ no ☒ N/A
(A) Describes discharge practices including non routine batch (slug) discharges	☐ yes ☐ no ☒ N/A
(B) Describes storage and handling of chemicals	☐ yes ☐ no ☒ N/A
(C) Procedures for immediate notification to POTW of slug discharges	☐ yes ☐ no ☒ N/A
(D) 1. Describes measures for controlling toxic/hazardous pollutants	☐ yes ☐ no ☒ N/A
2. Describes procedures and equipment for emergency response	☐ yes ☐ no ☒ N/A
3. Describes follow-up to limit damage suffered by POTW or environment	☐ yes ☐ no ☒ N/A
4. Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☒ no ☐ N/A
Are they posted in areas where chemicals are used and stored?	☐ yes ☐ no ☒ N/A
5. Are worker personnel provided training in the event of a spill or slug discharge?	☒ yes ☐ no ☐ N/A
This is part of their "apprenticeship" program.	
Has there been any non-routine, episodic chemical spills discharged to the City in the past year?	☐ yes ☒ no
(Briefly Describe, Include Dates) N/A	
Was the City notified of these occurrences? ☐ yes ☐ no ☒ N/A	
Visual Inspection of Discharge Lines/Points	
~2' deep sump just outside the NE side of the building where the phosphatizing takes place. The sampling / monitoring point has easy access, but sampling point (2" PVC) is too close to stagnant sump water level (~8" deep). When inside sump kicks on sending wastewater to the sampling sump the sampling point is quickly covered up so a representative sample mayor may not be taken. See Attachment A-1.	
Entire sump and pipes were coated with what looked like Fe oxide	
Total Flow Monitoring Point: 5 gallon bucket test with stop watch.	
Upstream Manhole: N/A	
Point of Connection: Near discharge point	

Attachment F: Self-Monitoring & if CFR 433, TTO/TOMP Requirements

Have Operator (or person collecting the sample) to describe how composite and grab samples are collected and preserved. Record descriptions. Include name of individual and title. One would have to crouch down and reach into the below grade discharge pipe (in sump) to capture a mix of frequently discharged process wastewater and what was already standing in the sump. Sample bottle had to be completely be submerged to obtain sample. Discussions ensued regarding modifying the discharge pipe keep discharge sample clear of standing sump level water.

Where is the sample point located?

☒ End of Process	☐ Pretreatment Effluent	☐ Total Flow
☐ Combined Flow	☐ Metered Flow	☐ Flow Actuator
☐ Private Manhole	☐ Utility Manhole	☐ Advance Notice Required

Is the Sample Collection Site Adequate?	☒ Yes ☐ No ☐ N/A
Does the facility rep. request a split sample on this sampling/inspection?	☐ Yes ☐ No
Does the facility perform self-monitoring tests in-house?	☐ Yes ☒ No ☐ N/A

If no, record the name and address of Contract Lab: American Testing Labs (Metals), 3301Langley Dr., Searcy, AR; American Interplex (Toxic Organics), 8600 Kanis Road, Little Rock, AR

Automatic Sampler ☐ or Manual ☒

IU Self-Monitoring Results reviewed: (from 3/29/13 "90 day compliance report")	☒ Yes ☐ No ☐ N/A
Is the Contract Lab certified by ADEQ for test parameters?	☒ Yes ☐ No ☐ N/A
Dates and Times of Sample Analysis Recorded?	☒ Yes ☐ No ☐ N/A
Correct Methods Used for Test Analysis (Refer To 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
EPA recommended holding times being met (Refer to 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
Chain of Custody Records for Self-Monitoring Samples Reviewed	☐ Yes ☒ No ☐ N/A *incomplete*
Were correct Sample Types Collected	☐ Yes ☒ No ☐ N/A *unknown*
Dates and times of Sample Collection Recorded?	☒ Yes ☐ No ☐ N/A
Were Samples preserved correctly (refer to 40CFR Part 136)	☒ Yes ☐ No ☐ N/A
Were Self Monitoring records on file for past 3 years?	☐ Yes ☐ No ☒ N/A Facility just began semi-annual reporting

Toxic Organic Management Plan (TOMP) for Metal Finishers under CFR 433

How does the IU comply with the TTO requirements? ☒ Analysis ☐ Certification Statement

Does the facility have a Toxic Organic Management Plan? ☐ Yes ☒ No ☐ N/A

If yes, Does the plan show how toxic organics are used, stored, and disposed? ☐ Yes ☐ No ☒ N/A

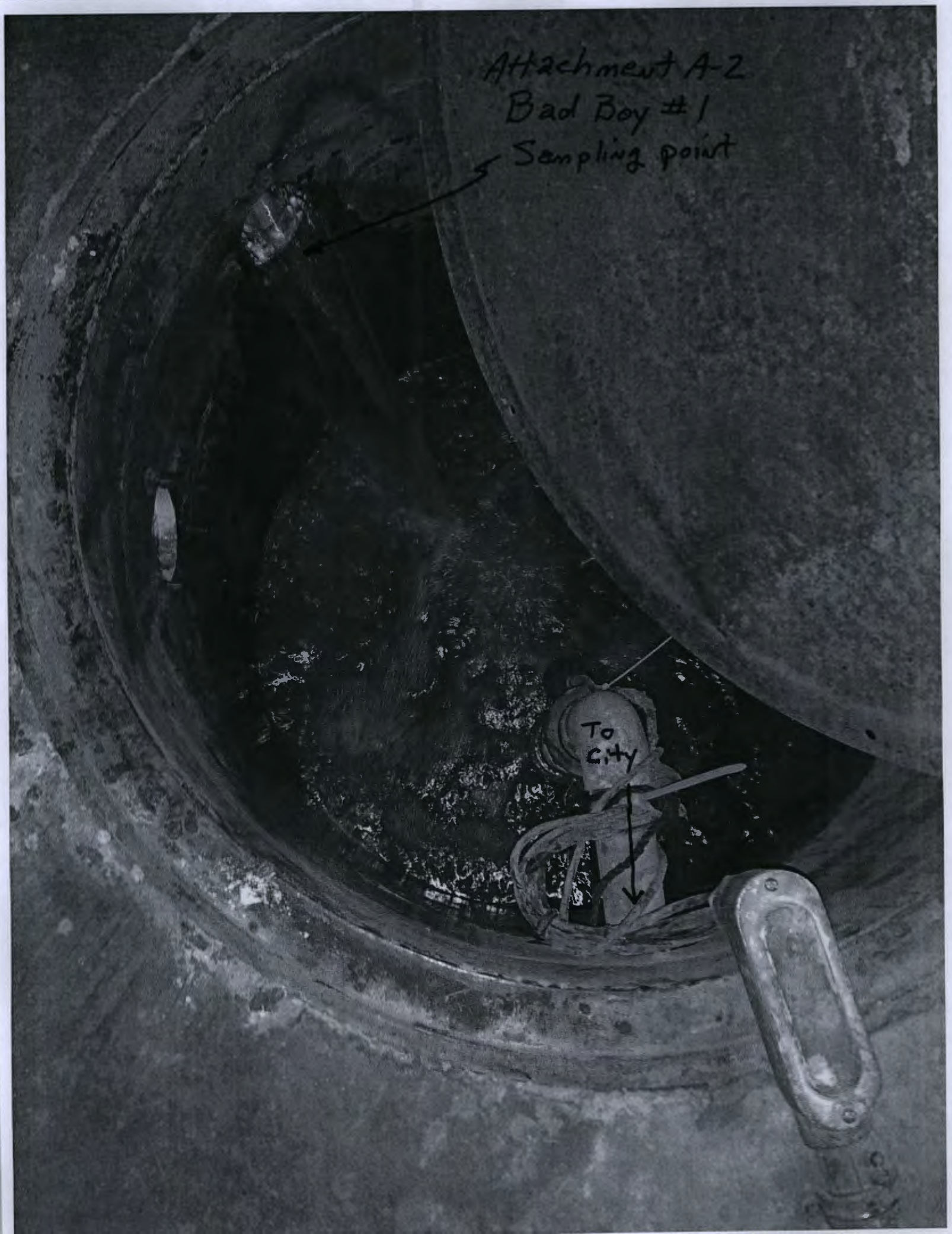
List the date of the last revision to the TOMP: N/A

Is the TOMP being followed as written? ☐ Yes ☐ No ☒ N/A Toxic Organic Management Plan yet to be submitted

If no, is there evidence that a TOMP is needed? ☐Yes ☒ No ☐ N/A (If yes, provide description of evidence in comments.)

Comments: Initial TTO scan submitted with their 3/29/13 "90 day compliance report" indicated non-detects for all toxic organics.


Attachment A-1
Bad Boy #2
Sampling point
(SP)
SP
To City


Attachment A-2
Bad Boy #1
Sampling point
To City

Attachment A-3

5301 Northshore Drive
North Little Rock, AR 72118
Telephone: 501-682-0744

Client Report For: Bad Boy 2013 1228-1231
Attention:
Client Address:

,

Report Date: May 06, 2013
LAB ID: AR13APR18-01
Comment:

Approved By: _____ Date:May 06, 2013

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Liitle Rock, AR 72118

Laboratory Contact: Jeff Ruehr
Ruehr@adeq.state.ar.us
501-682-0955

Client: Special Samples
Lab ID: 2013-1228

Client Sample ID: Bad Boy #1
Collection Date: 4/17/2013 9:28:00 AM
Matrix: Water

Analyses

Total Metals by EPA 200.8 ***EPA 200.8*** ***Batch: 13050110 Run: 1***

	Result	Reporting Limit	MDL	Qual	Unit
Aluminum	77.3	20	20		ug/L
Antimony	<10	10	5		ug/L
Arsenic	2.04	1	0.5		ug/L
Barium	20.5	10	2.0		ug/L
Beryllium	<0.5	0.5	0.1		ug/L
Boron	843	25	5.0		ug/L
Cadmium	<1	1	0.3		ug/L
Calcium	33.5	0.04	0.04		mg/L
Chromium	1.66	1	0.3		ug/L
Cobalt	<1	1	0.5		ug/L
Copper	1.20	1	0.5		ug/L
Iron	7350	20	10.0		ug/L
Lead	<1	1	0.1		ug/L
Magnesium	8.91	0.1	0.1		mg/L
Manganese	61.2	1	0.2		ug/L
Nickel	12.2	2.5	0.5		ug/L
Potassium	1.48	1	0.05		mg/L
Selenium	<2	2	0.5		ug/L
Silver	<5	5	1.0		ug/L
Sodium	3.07	0.04	0.02		mg/L
Thallium	<2.5	2.5	0.05		ug/L
Vanadium	827	2.5	1.0		ug/L
Zinc	23.0	3	2.0		ug/L
Dilution Factor	1				
Analyzed By	Chad Carrington				
Analysis Date/Time	Apr 24 2013 5:32AM				
Prep By					
Prep Date/Time					

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Liitle Rock, AR 72118

Laboratory Contact: Jeff Ruehr
Ruehr@adeq.state.ar.us
501-682-0955

Client: Special Samples
Lab ID: 2013-1229

Client Sample ID: Bad Boy #1b
Collection Date: 4/17/2013 12:15:00 PM
Matrix: Water

Analyses

Total Metals by EPA 200.8 ***EPA 200.8*** ***Batch: 13050110 Run: 1***

	Result	Reporting Limit	MDL	Qual	Unit
Aluminum	86.0	20	20		ug/L
Antimony	<10	10	5		ug/L
Arsenic	2.00	1	0.5		ug/L
Barium	20.6	10	2.0		ug/L
Beryllium	<0.5	0.5	0.1		ug/L
Boron	816	25	5.0		ug/L
Cadmium	<1	1	0.3		ug/L
Calcium	33.4	0.04	0.04		mg/L
Chromium	1.56	1	0.3		ug/L
Cobalt	<1	1	0.5		ug/L
Copper	1.41	1	0.5		ug/L
Iron	7360	20	10.0		ug/L
Lead	<1	1	0.1		ug/L
Magnesium	9.50	0.1	0.1		mg/L
Manganese	59.2	1	0.2		ug/L
Nickel	13.0	2.5	0.5		ug/L
Potassium	1.53	1	0.05		mg/L
Selenium	<2	2	0.5		ug/L
Silver	<5	5	1.0		ug/L
Sodium	14.4	0.04	0.02		mg/L
Thallium	<2.5	2.5	0.05		ug/L
Vanadium	911	2.5	1.0		ug/L
Zinc	22.8	3	2.0		ug/L
Dilution Factor	1				
Analyzed By	Chad Carrington				
Analysis Date/Time	Apr 24 2013 5:57AM				
Prep By					
Prep Date/Time					

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Liitle Rock, AR 72118

Laboratory Contact: Jeff Ruehr
Ruehr@adeq.state.ar.us
501-682-0955

Client: Special Samples
Lab ID: 2013-1230

Client Sample ID: Bad Boy #2
Collection Date: 4/17/2013 8:05:00 AM
Matrix: Water

Analyses

Total Metals by EPA 200.8 ***EPA 200.8*** ***Batch: 13050110 Run: 1***

	Result	Reporting Limit	MDL	Qual	Unit
Aluminum	96.0	20	20		ug/L
Antimony	<10	10	5		ug/L
Arsenic	9.99	1	0.5		ug/L
Barium	24.1	10	2.0		ug/L
Beryllium	<0.5	0.5	0.1		ug/L
Boron	507	25	5.0		ug/L
Cadmium	<1	1	0.3		ug/L
Calcium	35.3	0.04	0.04		mg/L
Chromium	2.70	1	0.3		ug/L
Cobalt	1.34	1	0.5		ug/L
Copper	14.9	1	0.5		ug/L
Lead	<1	1	0.1		ug/L
Magnesium	8.96	0.1	0.1		mg/L
Manganese	199	1	0.2		ug/L
Nickel	27.5	2.5	0.5		ug/L
Potassium	1.7	1	0.05		mg/L
Selenium	<2	2	0.5		ug/L
Silver	<5	5	1.0		ug/L
Sodium	2.00	0.04	0.02		mg/L
Thallium	<2.5	2.5	0.05		ug/L
Vanadium	466	2.5	1.0		ug/L
Zinc	132	3	2.0		ug/L
Dilution Factor	1				
Analyzed By	Chad Carrington				
Analysis Date/Time	Apr 24 2013 6:17AM				
Prep By					
Prep Date/Time					

Total Metals by EPA 200.8 ***EPA 200.8*** ***Batch: 13050110 Run: 2***

	Result	Reporting Limit	MDL	Qual	Unit

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Liitle Rock, AR 72118

Laboratory Contact: Jeff Ruehr
Ruehr@adeq.state.ar.us
501-682-0955

Iron	9980	400	10.0	ug/L
Dilution Factor	20			
Analyzed By	Chad Carrington			
Analysis Date/Time	Apr 24 2013 12:19PM			
Prep By				
Prep Date/Time				

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Liitle Rock, AR 72118

Laboratory Contact: Jeff Ruehr
Ruehr@adeq.state.ar.us
501-682-0955

Client: Special Samples
Lab ID: 2013-1231

Client Sample ID: Bad Boy ~~#1b~~ 2b ~~AB~~
Collection Date: 4/17/2013 12:20:00 PM
Matrix: Water

Analyses

Total Metals by EPA 200.8 ***EPA 200.8*** ***Batch: 13050110 Run: 1***

	Result	Reporting Limit	MDL	Qual	Unit
Aluminum	135	20	20		ug/L
Antimony	<10	10	5		ug/L
Arsenic	14.7	1	0.5		ug/L
Barium	34.2	10	2.0		ug/L
Beryllium	<0.5	0.5	0.1		ug/L
Boron	468	25	5.0		ug/L
Cadmium	<1	1	0.3		ug/L
Calcium	34.4	0.04	0.04		mg/L
Chromium	4.82	1	0.3		ug/L
Cobalt	2.00	1	0.5		ug/L
Copper	25.5	1	0.5		ug/L
Magnesium	9.74	0.1	0.1		mg/L
Manganese	302	1	0.2		ug/L
Nickel	41.4	2.5	0.5		ug/L
Potassium	1.62	1	0.05		mg/L
Selenium	<2	2	0.5		ug/L
Silver	<5	5	1.0		ug/L
Sodium	2.16	0.04	0.02		mg/L
Thallium	<2.5	2.5	0.05		ug/L
Vanadium	1240	2.5	1.0		ug/L
Zinc	200	3	2.0		ug/L
Dilution Factor	1				
Analyzed By	Chad Carrington				
Analysis Date/Time	Apr 24 2013 6:42AM				
Prep By					
Prep Date/Time					

Total Metals by EPA 200.8 ***EPA 200.8*** ***Batch: 13050110 Run: 2***

	Result	Reporting Limit	MDL	Qual	Unit
Iron	17200	400	10.0		ug/L

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Liitle Rock, AR 72118

Laboratory Contact: Jeff Ruehr
Ruehr@adeq.state.ar.us
501-682-0955

Dilution Factor	20
Analyzed By	Chad Carrington
Analysis Date/Time	Apr 24 2013 12:32PM
Prep By	
Prep Date/Time	