Torrence, Rufus

From: Torrence, Rufus
Sent: Thursday, June 03, 2010 8:12 AM
To: Justin Halford (jwh@twhenterprises.com)
Subject: AFIN 34-00101 ARP001054 TWH Site Visit for Compliance Assurance: Inspection

ADEQ
ARKANSAS
Department of Environmental Quality

June 3, 2010

Justin Halford, Engineer
TWH Enterprises, Inc
700 Pepsi Cola Road
Batesville, AR 72501

Re: May 12, 2010 Site Visit for Compliance Assurance: Inspection
(Tracking No. ARP001054, AFIN 34-00101)

Dear Mr. Halford:

Part of ADEQ responsibility to EPA is to ensure that inspections of industries regulated by categorical pretreatment standards (40 CFR Part 405 – 471) are performed on a periodic basis. These industries are referred to as Categorical Industrial Users (CIUs) if they discharge the regulated wastewater into the local Publicly Owned Treatment Works (POTW). In accordance to 40 CFR 403.12(e), these CIUs must submit periodic reports to the Control Authority (ADEQ or Department) and in accordance with 40 CFR 403.8(f)(2)(v) be inspected by the Control Authority at least bi-annually. Please note that EPA interchanges the terms "POTW" and "Control Authority" in 40 CFR 403 and TWH must consider them synonymous. ADEQ serves at the Control Authority for the City of Batesville POTW and TWH may substitute "ADEQ" where the regulations refer to "POTW".

TWH has processes (anodizing, alodine, etc.) in the Batesville, AR facility that are regulated by 40 CFR Part 433 and discharges to the City of Batesville POTW. Therefore, TWH is a CIU. On Wednesday (May 12, 2010), the Department conducted an inspection of the TWH facility. Please note that TWH old categorization was 40 CFR 413. Refer to page 4 in the inspection report for an explanation.

The Department appreciates TWH taking the time on Wednesday to show ADEQ Engineer (Rufus Torrence) the new TWH facility in Batesville. The inspection consisted of visiting key areas (shown on the attached report) and taking a wastewater sample. In the anodizing area, contact process water is circulated through a deionization unit. Since TWH releases the wastewater in batch operations from the circulating system, the ADEQ engineer took a sample from the main holding tank which contained raw untreated wastewater.

The ADEQ lab analysis is attached. The wastewater in the holding tank is almost pure except for some aluminum. TWH must continue to sample the wastewater after treatment and just before it enters the POTW.

The Department appreciates the TWH's continued efforts in periodic reporting.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us .

Sincerely,

Rufus Torrence,
ADEQ Engineer

Attachments: ADEQ Lab Analysis
ADEQ Inspection Report dated May 12, 2010

Arkansas Department of Environmental Quality

5301 Northshore Drive
North Little Rock, AR 72118

- CERTIFICATE OF ANALYSIS -

Our Lab#: 2010-1210
Sample ID: TWH
Sample Type: X

Sample Collect Date: 5/12/2010
Report Date: 6/2/2010

Test Group	Test		Result	Units	Analysis Date	MDL	RDL
ICP/MS-T							
	Aluminum		21300	µg/L	5/20/2010	20	200
	Antimony	<	100	µg/L	5/20/2010	5	100
	Arsenic	<	10.0	µg/L	5/20/2010	0.5	10.0
	Barium	<	100	µg/L	5/20/2010	2	100
	Beryllium	<	5.00	µg/L	5/20/2010	0.1	5.00
	Boron		321	µg/L	5/20/2010	5	250
	Cadmium	<	10.0	µg/L	5/20/2010	0.3	10.0
	Calcium		13.7	mg/L	5/20/2010	0.04	0.400
	Chromium		165	µg/L	5/20/2010	0.3	10.0
	Cobalt	<	10.0	µg/L	5/20/2010	0.5	10.0
	Copper		293	µg/L	5/20/2010	0.5	10.0
	Iron		2260	µg/L	5/20/2010	10	200
	Lead		20.3	µg/L	5/20/2010	0.1	10.0
	Magnesium		4.26	mg/L	5/20/2010	0.1	1.00
	Manganese		28.2	µg/L	5/20/2010	0.2	10.0
	Nickel		550	µg/L	5/20/2010	0.5	25.0
	Potassium		9.58	mg/L	5/20/2010	0.05	1.00
	Selenium	<	20.0	µg/L	5/20/2010	0.5	20.0
	Silicon Dioxide	<	2.00	mg/L	5/20/2010	0.02	2.00
	Silver	<	50.0	µg/L	5/20/2010	1	50.0
	Sodium		2950	mg/L	5/20/2010	0.02	0.400
	Thallium	<	25.0	µg/L	5/20/2010	0.5	25.0
	Vanadium	<	25.0	µg/L	5/20/2010	1	25.0
	Zinc		84.8	µg/L	5/20/2010	2	30.0

Pretreatment Industrial Inspection

Facility Information

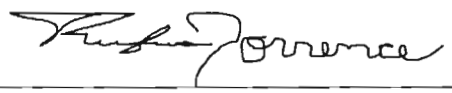
Facility Name: **TWH Enterprises, Inc**	Site Address: **700 Pepsi Cola Rd.**
	Batesville, AR 72501
Signatory Authority (Name & Title):	
Phone: **(870) 251-1200**	Mailing Address (if different): **(Same)**
Fax: **(870) 251-1202**	
Address: **(Same)**	Corporate Owner Name and address (if applicable):
	Not Applicable – Privately Owned
Phone: **(Same)**	
Fax: **(Same)**	Phone: **Not Applicable**
Contact Person (Name & Title):	Fax: **Not Applicable**
Justin Halford, Engineer	Corporate CEO: **Not Applicable**
e-mail: **twh@twhenterprises.com**	e-mail: **Not Applicable**
Facility Permit # **ARP001054** AFIN **32-00548**	Last Inspection Date: **4-30-09**
POTW (City) IU discharges to: **Batesville**	POTW's NPDES #AR0020702
Industrial Classification: ☒ Categorical	☒ Significant
If Categorical, list which CFR #(s) the facility is subject to: **40 CFR 433 Metal Finisher (Anodizing and Alodine)**	

Table of Contents

Comments : **TWH relocated to a new building with about 62,000 sq ft. TWH is no longer an existing source.**

Since TWH moved to this new location in 2009, TWH will be regulated by 40 CFR 433 instead of

40 CFR 413. TWH moved from Newport to Batesville and the new location is a "New Source".

Inspector's Name (Print): **Rufus Torrence**	Signature: 
IU Rep's Name (Print) **T W Halford**	Signature: **Not Applicable**

Date and Time Inspection Ended: **5-12-2010 @ 11.25 am**

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**

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

☒ Pre-inspection Meeting	☐ Permit Conditions	☐ Safety Concerns
☐ Process Inspection	☒ Pretreatment Process	☐ TOMP
☒ 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	☐

Comments:

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

Process Area(s)

Pretreatment System

Self Monitoring Procedures

Diversion/Sewer Meters

Spill/Slug Control Plan

Sampling Point

Chemical Storage

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: **5-12-2010 @ 9:45 am**	SIC code(s): **3471, 3499, 3812**
IU Reps/Titles	Control Authority Reps/Titles
Justin Halford, Mechanical Engineer	**Rufus Torrence, Engineer**
End product(s): **(Job Shop)**	Approx. # of units produced: **N/A**
Days of Operation: **Varies**	Days of Production (if different): **Varies**
Hours of Operation: **Varies**	Hours of Production (if different): **Varies**
Shift 1, hrs.: **Day Only**	Shift 2, hrs.: **N/A** / Shift 3, hrs.: **N/A**
# of Employees: **2**	Peak Mos.: **N/A** / "Off" Mos.: **N/A**

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:

Are there any Safety Concerns or Identified Hazards that the inspector should be aware of: ☐ Yes. ☒ No

If Yes, explain:

Has there been any changes since the last inspection regarding the following items:

Plant/flow/process layout? Yes ☐ No ☐ N/A ☒ If yes, obtain copy of updated schematic for facility file.

Processes? Yes ☐ No ☐ N/A ☒ If yes, explain:

Production Levels? Yes ☐ No ☐ N/A ☒ If yes, explain:

Raw materials? Yes ☐ No ☐ N/A ☒ If yes, explain:

Flow rates? Yes ☐ No ☐ N/A ☒ 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 ☒
At connection to sanitary sewer?	yes ☐	no ☐	N/A ☒
Production and flows verified for Production-Based Standards?	yes ☐	no ☐	N/A ☒

What is the current avg. production rate and process flow?s **Not Applicable**

Is the prod. rate or flow substantially different (+/- 20%) from those used in calculating limits? yes ☐ no ☐

Not Applicable

B. Facility Permits		
Permit Type	Permit No.	Expiration Date
Air		
RCRA	**ARD067681189**	**(Active)**
NPDES	**ARR00B261**	**(Voided)**
Other		

C. Additional Comments

(Note which section or attachment comments are regarding)

1. **In accordance with 40 CFR 433.10(c)(2), TWH falls under 40 CFR 433 in lieu of 40 CFR 413. The Batesville facility is a "new source". Referring to 40 CFR 403.3(m)(1), the Pretreatment Standards for 40 CFR Part 433 were published on August 31, 1982. So any facility constructed after this date is a "new source". Only "existing Job Shops" fall under 40 CFR Part 413.**

2. **TWH has a 40 CFR 463 Plastic Molding and Forming operation in the Batesville facility.**

Attachment A: Industrial Process(es)

List process(es) generating wastewater. Note if it's categorical (federally regulated w/pretreatment limits) or not

1. **Anodizing**	Yes ☒ No ☐	4.	Yes ☐ No ☐
2. **Alodine**	Yes ☒ No ☐	5.	Yes ☐ No ☐
3.	Yes ☐ No ☐	6.	Yes ☐ No ☐

Were processes visually inspected? Yes ☒ No ☐ N/A ☐

Brief description of process(es):

TWH is anodizing and alodining small machined parts, etc.

General observations of facility's indoor housekeeping: **Excellent (New Building)**

General observations of area outside facility's building: **Excellent (New Landscaping)**

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

☐ Process Rinse Overflows	☐ Equip. Cleanup	☐ Floor Cleanup	☐ Spent Bath Solutions
☐ Product Cleaning	☐ Forklifts Maint./Wash	☐ Tank Dragout	☐ Air Pollution Devices
☐ Boiler Blowdown	☐ Spent Rinse Tanks	☐ Equipment Coolants	☐ Non-Contact Cooling Water
☐ Stormwater	☐	☐	☐

List Major Raw Materials and Chemicals used:

TWH is a "job shop" which makes parts from standard metal shapes (round bars, square bars, plates, etc.)

Check Waste Stream Pollutants of Concern from Process(es)

☐ BOD	☒ CN^-	☒Metals (List) **Cd, Cu, Cr, Pb Ni, Ag & Zn**	☐ Solvents (List)
☐ TSS	☐ Cl_2		
☐ O&G	☐ S^-		
☐ 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 ☒
Does this facility practice P2?	Yes ☒	No ☐
Environmental Management System in place?	Yes ☐	No ☒
ISO Certified?	Yes ☐	No ☒
Written Standard Operating Procedures?	Yes ☐	No ☒
Explain:		
Preventative Maintenance Program	Yes ☒	No ☐ (hydraulic systems, valves, pumps, etc)
Explain:		
Water Reuse:	Yes ☒	No ☐
Explain:		
Cost Accounting to Track Savings:	Yes ☐	No ☒
Explain:		
Inventory Control / "Green Purchasing":	Yes ☒	No ☐ (lean manufacturing/"env. friendly purchasing", etc)
Explain:		
Employee Training:	Yes ☐	No ☒
Explain:		
Spent Solvent Reclamation?	Yes ☐	No ☒
Explain:		
Recycle Paper, Aluminum, Boxes, and Pallets?	Yes ☒	No ☐
Explain:		
Recycle Waste Oil, Solvents, and Lubricants?	Yes ☐	No ☒
Explain:		
Other Activities		

P2 Equipment/Practices in use:	
☐ Overflow Alarms	☐ Aqueous Cleaning Solutions
☐ Fog Spray Rinsing	☐ Countercurrent Rinsing
☐ Dragout Collection Trays	☐ Seal-Less Pumps
☐ Air Jets to Blow Parts Dry	☐ Secondary Containment of Process Solutions
☐ Aqueous Paint Stripping Solutions	☐ Bead Blasting to Remove Paint
☐ Water Soluble Cutting Fluids	☐ Recycle Overspray
☐ In-Process Recycle (Ion Exchange, Reverse Osmosis)	☒ Conductivity Meters
☐ Dead Rinse Tanks	☒ Bath / Rinse Filtration

Attachment C: Pretreatment System

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:

☐ Dissolved air floatation	☐ Membrane Tech.	☐ Ion Exchange	☐ Biological Treatment
☐ Centrifugation	☐ Flow Equalization	☐ Ozonation	☐ Chlorinating
☒ Chemical Precipitation	☐ Oil/Water Separation	☐ Reverse Osmosis	☐ Grit Removal
☒ Sludge Filter Press	☐ Grease Trap	☐ Screen	☐ Solvent Separation
☒ pH Adjustment	☐ Sand Trap	☐ Sedimentation	☐ Silver Recovery
☐ Belt/Disk Oil Skimmer	☒ Deionization Unit	☐	☐

Provide Brief Description of Pretreatment System (leaks, cleanliness, equipment not in working order):

Closed loop system with D. I. treatment is in good condition and well maintained. D. I. unit is backwashed every three weeks (approximately) and about 500 gallons of wastewater is treated and released to the POTW. The entire process area is above a sloped pit that ends in the pretreatment area. Any captured ww is pumped to treatment.

Does the description match the schematic currently on file? ☒ Yes ☐ No ☐ N/A

System Operator(s) Name: **Justin Halford**

Does discharge permit require licensed operator?	☐ Yes	☐ No	☒ N/A
Is the System Operator(s) licensed by the State of Arkansas (per Reg. # 3?)	☐ 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:

Is the discharge from the Pretreatment System? ☒ Batch ☐ Continuous ☐ Combination

If any discharges are batch type or combination, describe the following:

Volume of each batch: **500** gallons per **2-3 weeks**

Describe process from which batch originated (spent bath, e.g.): **Spent Anodizing/Alodining Bath**

Approximate duration of batch discharge:

Meter Type	Calibration Procedure and Frequency	Comments (Totalizer Reading)
N/A	**N/A**	**N/A**

Attachment D: Chemical Storage Area(s)		
Does the facility have a designated chemical storage area(s)? ☐Yes ☒No *(see comment below)*		
Was this area(s) visually inspected? ☐Yes ☐No ☒N/A		
Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. **Not Applicable**	☐Yes ☐No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2. **Not Applicable**	☐Yes ☐No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
3. **Not Applicable**	☐Yes ☐No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
4. **Not Applicable**	☐Yes ☐No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
Does the Chemical Storage Area(s) contain any of the following? **Not Applicable**		
☐ 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		
Were any new MSDS reviewed during the Inspection? ☐Yes ☒No ☐N/A		
If yes, list below:		
Not Applicable		
Chemical storage comments:		
All bulk chemicals are stored in the same room with the treatment system and D.I. Unit.		
Chemical handling procedures (totes, dolly, buckets, hardline, etc):		
Not Applicable		

Attachment E: Spill/Slug Control Plan	
Does the facility have a Spill/Slug control plan?	☐ yes ☒ no[1]
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
5. Are worker personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no ☐ N/A
If no:	
Does the facility have Spill/Slug Notification Procedures posted?	☐ yes ☐ no
Is it posted in areas where chemicals are used and stored?	☐ yes ☐ no
If Yes how many?	
Are appropriate personnel provided training in the event of a spill or slug discharge?	☐ yes ☐ no
Have there been any non-routine, episodic discharges or chemical spills in the past year?	☐ yes ☐ no
(Briefly Describe, Include Dates)	
Was the City notified of these occurrences? ☐ yes ☐ no ☐ N/A	
Visual Inspection of Discharge Lines/Points	
Provide description of manhole condition and flow channel of the following where applicable:	
Sampling / Monitoring Point **The inspector took the sample from the surge tank since no "treated" water was available.**	
Total Flow Monitoring Point	
Upstream Manhole	
Point of Connection:	

[1]**There are no floor drains; hence, virtual no potential for an accidental spill to enter the POTW. The process area is above a pit that slopes to the treatment area.**

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. **Justin Halford normally witnesses Arkansas Testing Lab Tech when the tech is grabbing a sample from the effluent just before it enters the pipe to the sewer system. Justin says that the tech immediately preserves the sample by injecting nitric acid into the plastic jug containing the sample.**

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
☐ Safety Hazards Identified	☐	☐

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: **Arkansas Testing Lab in Searcy, AR**

Automatic Sampler ☐ or Manual ☒

IU Self-Monitoring Results reviewed:	☐ 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
Were correct Sample Types Collected	☐ Yes ☐ No ☐ N/A
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

List the parameters the facility monitors and the frequency:

☒ Cd(t) **twice/year**	☒ Cu(t) **twice/year**	☒ Cr(t) **twice/year**	☒ Ni(t) **twice/year**	☒ Pb(t) **twice/year**
☒ Ag(t) **twice/year**	☒ Zn(t) **twice/year**	☐ pH	☒ CN^-(t) **twice/year**	☐ CN^-(a-c)
☐ TTO-Vol	☐ TTO-B/N	☐ TTO-A.E.	☐ TTO-Pest	☐ Cr(hex)
☐	☐	☐	☐	☐

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

How does the IU report TTO? ☐ 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:

Is the TOMP being followed as written? ☐ Yes ☐ No ☐ N/A (If no, provide explanation in comments.)

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

Comments: **According to the TWH cover letter attached to each semi-annual report, TWH does not store or use any chemicals that contain any of the 110 regulated toxic organics.**