ADEQ

ARKANSAS
Department of Environmental Quality

December 3, 2007

Kevin Campbell
Assistant Plant Manager
6533 HWY 126 North
P.O. Box 270
Midway, AR 72651

Re: EZ Loader Pretreatment Compliance Assurance Visit (Tracking #ARP001055 / AFIN #03-00177)

Dear Mr. Campbell:

Under 40 CFR 403.8(f)(1)(i): "[ADEQ is required to] Carry out all inspection, surveillance and monitoring procedures necessary to determine, independent of information supplied by Industrial Users, compliance or noncompliance with applicable Pretreatment Standards and Requirements by Industrial Users. Representatives of [ADEQ] shall be authorized to enter any premises of any Industrial User in which a Discharge source or treatment system is located or in which records are required to be kept under §403.12(o) to assure compliance with Pretreatment Standards. Such authority shall be at least as extensive as the authority provided under section 308 of the Act…"

Please find enclosed the completed inspection conducted at your facility on 11/13/07. EZ Loader appears to be compliant with the general Pretreatment Regulations found in 40 CFR 403 and specifically, the categorical pretreatment standards per 40 CFR 433.17.

The grab samples taken were analyzed by ADEQ's laboratory showing compliance with the most stringent "monthly average shall not exceed" pretreatment standards for new sources (see Certificate of Analysis in Attachment A-4). All metals analyzed were well below the federal guideline limitations.

Recommendations:

1) As noted during the visit, you mentioned moving the wash bay to a new area in the building to make more efficient your production line. Once completed, please revise the schematic (Attachment A-1) with appropriate changes clearly marking the flow line(s) from your regulated process to its point of discharge into the city's collection system. An entire plant layout is not necessary, just a schematic showing/identifying flow lines of all wastewater generated at your facility including your sanitary and any other non-regulated wastewater flows.

2) A toxic organic management plan (TOMP) was discussed prior to and during the site visit. While not required, it is strongly advised to submit an approvable one that meets the requirements in 40 CFR 403.12(b). The Agency would then be in the position to approve the TOMP and waive your semi-annual (costly) testing for the extensive list of organics.

During the walk through of your facility, it was obvious there was not an extensive amount of toxic organics on-site. And, the way in which you "handle" them would indicate to this auditor they would not enter the city's collection system "in toxic amounts" without a deliberate action.

It was a pleasure working with you and your staff. Your open cooperation and willingness to share requested information is greatly appreciated.

If you should have further questions or comments regarding this report, please feel free to contact this office at (501) 682-0625.

Sincerely,

Allen R. Gilliam

Allen R. Gilliam
ADEQ State Pretreatment Coordinator

Attachments: 11/13/07 "Pretreatment Industrial Inspection" and A-1 through A-4

cc: Greg Hurley/NPDES Enforcement
Alma Clark/Plant Supervisor/720 South Hickory Street/Mountain Home, AR 72653
Randy Johnson/P.O. Box 270/Spokane, WA 99220

Pretreatment Industrial Inspection
Facility Information

Facility Name:	Site Address:
EZ Loader Boat Trailers	6533 Hwy 126 North Midway, AR 72651
Signatory Authority (Name & Title): Kevin Campbell / Safety and Compliance Manager	
Phone: 870.481.5138 X-259	Mailing Address (if different): P.O. Box 270
Fax: 870. 481. 5150	Midway, AR 72651
Address: Same	Corporate Owner Name and address (if applicable):
	Randy Johnson / P.O. Box 270 / Spokane, WA 99220
Phone: Same	717 North Hamilton Street
Fax:	Phone: 509. 489. 0181
Contact Person (Name & Title): Same	Fax: 509. 489. 0404
	Corporate CEO:
e-mail: kcampbell@ezloader.com	e-mail:
Facility Permit/Tracking # ARP001055	**Last Inspection Date: N/A**
POTW (City) IU discharges to: ~~Midway Collection System to~~ Mt. Home	POTW's NPDES #AR0021211
Industrial Classification: ☒ Categorical	☐ Significant
If Categorical, list which CFR #(s) the facility is subject to: 40 CFR 433.17 Began ops 12/5/06	

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Comments : Excellent cooperation w/ facility reps. TOMP should be developed and submitted for waiving expensive toxic organic scan. Facility appeared NOT to have the potential for a slug discharge ; therefore, no slug plan necessary.

Inspector's Name (Print): Allen Gilliam	Signature: Allen Gilliam
IU Rep's Name (Print) KEVIN D. CAMPBELL	Signature: Kevin D. Campbell
Date and Time Inspection Ended: 11/13/07 4:00 pm	

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): Verify compliance with minimum CFRs 433 and 403 requirements

Checklist of items to be reviewed, discussed 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

EZ Loader appeared to be compliant with the federal regulations in 40 CFRs 403 & 433. (see Attachment A-4 for certificate of analysis from grab samples taken during inspection)

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

Records Review: Facility files were not comprehensively reviewed although correspondence and data were readily available. IU rep understood that all pretreatment records were to be maintained at least for a 3 yr period.

Process Area(s): Appeared orderly and clean

Pretreatment System: No pretreatment necessary except pH adjustment to satisfy City's upper limit of 9 s.u.

Self Monitoring Procedures: Adequate, using an R/O water-rinsed pyrex measuring cup to pour into certified contract lab's pre-preserved sample containers. Good sampling logs kept.

Diversion/Sewer Meters: N/A

Spill/Slug Control Plan: No potential determined. Process wastewater has to be manually pumped to "treatment" tanks

Sampling Point: Adequate for grab sampling. Easy access. Facility batch discharges.

Chemical Storage: Adequate with very few storage areas. Building's concrete slab floor does slope to the middle of facility, not towards the only drain to the "pretreatment tanks". Paints are kept in a separate mixing room with a sliding metal window for transfer of mixture(s) to the paint booth operators. Room is well ventilated and self-contained

II. Pre-Inspection Meeting

A. General Information

Date and Time Inspection Started: 11/13/07 @ 11:50 a.m.		SIC code(s): 3379
IU Reps/Titles	Control Authority Reps/Titles	
Kevin Campbell/Safety & Compliance Mgr. Jerry Leppold/Plant Engineer Steve Johnstone/Foreman, Technician	Allen Gilliam/ADEQ State Pretreatment Coordinator	
End product(s): Custom (steel) boat trailers		Approx. # of units produced: ~11,000/yr
Days of Operation: Monday thru Thursday	Days of Production (if different): same	
Hours of Operation: 5 a.m. to 2:00 a.m.	Hours of Production (if different): same	
Shift 1, hrs.: 5 a.m. to 3:30 p.m.	Shift 2, hrs.: 3:30 p.m. to 2:00 a.m.	Shift 3, hrs.: N/A to
# of Employees: ~160	Peak Mos.: "not noticeable"	"Off" Mos.: June/July

Are there any scheduled plant shutdowns? Yes ☒ No ☐ N/A ☐ If yes, when? Weeks of July 4th & Dec. 25th

Are there ~~designated~~ plant clean-up days? Yes ☒ No ☐ N/A ☐ If yes, when? ~once/quarter (random)

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: Eye protection necessary

Has there been any changes since the last inspection regarding the following items: N/A (first inspection)

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

Processes? Yes ☐ No ☒ ~~If yes, explain:~~ Facility reps indicated the "(old wash)" area will be moved in the near future to a **new wash** bay to make more efficient product flow. See Attachment A-1 for highlighted wash area(s).

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 ☒
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? Batch discharged @ ~300 to 400 gpd

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

B. Facility Permits		
Permit Type	Permit No.	Expiration Date
Air	0926-AR-5	
RCRA	#ARD983267105	
NPDES	N/A	
Stormwater (General)	ARR00A65	

C. Additional Comments

(Note which section or attachment comments are regarding) Pre-Inspection ADEQ file review

BMR process appears to have begun back in '06. There is a "BMR" in this office's file signed and dated by Gary Potter (EZ Loader Vice President) on 8/30/06 (via ECCI Engineering) complete with certification statement. Analyticals from Star Analytical from Ft. Worth, TX (report date 9/21/04) indicated sample was from "Sundowner Trailers" in Coleman, OK. Analyticals from Environmental Testing Inc. from OK City (C of C sample date 10/11/05) indicated sample was from Big Tex Trailers in Mt. Pleasant, TX. No notes on these two were found but this office is assuming EZ Loader had not begun production and was only supplying info on similar sister (?) companies' discharge results for examples.

R. Torrence's correspondence dates 11/17/06 does indicate "BMR rec'd 9/5/06". A second one on file is signed and dated by Gary Potter on 3/2/07. What appears to be the 90 day compliance report is on file signed and dated 4/2/07.

R. Torrence's e-mail dated 4/24/07 indicated the schematic diagram was still outstanding and the entire TTO scan had been rec'd (data from Arkansas Analytical results was rec'd on 4/23/07). EZ Loader's first (?) semi-annual (signed with certification statement on 8/27/07) report included the complete toxic organic scan and CFR 433 metals & CN. Results indicated compliance with the federal 40 CFR 433 standards.

Attachment A: Industrial Process(es)

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

1. Alkaline Cleaning	Yes ☒ No ☐	4.	Yes ☐ No ☐
2. Fe Phosphatizing/rinse	Yes ☒ No ☐	5.	Yes ☐ No ☐
3. Sanitary Sewer	Yes ☐ No ☒	6.	Yes ☐ No ☐

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

Brief description of process(es): Trailer frames (already formed & welded) are physically carted to "wash booth" area. The frames are first manually alkaline cleaned (SteelPrep 400), manually hi-pressure sprayed with a hot phosphoric acid wash (SteelPrep 300), then sprayed with a fresh water rinse prior to being sent to a "heating room", then to painting ops (see Attachment A-3 for SteelPrep's MSDS).

This is the only area where there is regulated wastewater generated. The floor in this area is sloped towards a grated sump which in turn is manually pumped into one of the two "treatment tanks" on the other side of the wall. Pump intake in this sump is about 3" from the bottom which allows the "heavies"/grit/trash to settle out. This is shoveled out about every 2 weeks. They've added a finer screen to the sump grating to keep out as much trash as possible to help save on pump clean-out/maintenance.

Chemicals used in this operation are pumped to the operator via hoses connected to appropriate tote. Totes are kept in a separate/adjacent room.

Frames are hoisted onto conveyor system, sent through the primer then paint room prior to being sent through the bake oven. After cooling, the remaining operations include assembly of finished trailer (pen-striping, axles, brakes, tires, electrical wiring, lights, connecting of specialty chrome and carpet parts, hitch assembly, etc).

See Attachment A-2 for facility's "standard operating procedures" which include some pictures of operations.

General observations of facility's indoor housekeeping: generally clean with no visible fluid puddles

General observations of area outside facility's building: clean and orderly with very little raw material exposed

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 (floors manually swept)	☐ 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	☒ Entire Alkaline/Phosphate process (B) @ ~ 300 to 400 gpd	☐	☐

List Major Raw Materials and Chemicals used:

Steel tube (square/rectangular/angle), sodium hydroxide, phosphoric acid, numerous colors of paint, acetone and paint thinner.

Check Waste Stream Pollutants of Concern from Process(es)

☐ BOD	☒ CN^-	☒ Metals (List): see CFR 433 Metals	☒ Solvents (List) see CFR 433 toxic organics
☐ 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:

Floor drain is pumped to one of the two "treatment" tanks

Attachment B: Pollution Prevention (P2) / Recycling Activities

Does the facility have a written P2 Plan? Yes ☐ No ☒

Does this facility practice P2? Yes ☒ No ☐

Facility distills its used acetone (from cleaning paint guns). They reclaim/re-use about 80% of this each cycle. The $55K machine paid for itself in the first year of use. It's Italian made and "the first one sold in the U.S." They have no problem remaining a haz waste SQG now.

Switched paints to a higher solid base which covers more area with a higher "transfer" rate. Now, more trailers are painted with less waste.

Environmental Management System in place? Yes ☐ No ☒

ISO Certified? Yes ☐ No ☒ Not required

Written Standard Operating Procedures? Yes ☒ No ☐

Explain: See Attachment A-2

Preventative Maintenance Program Yes ☒ No ☐ (hydraulic systems, valves, pumps, etc)

Explain: SOP explains to operator(s) how to check for spray equipment plugging, etc

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: Facility orders just enough raw material for customer needs

Employee Training: Yes ☒ No ☐

Explain:

Recycle Waste Oil, Solvents, and Lubricants? Yes ☒ No ☐

Explain:

Recycle Paper, Aluminum, Boxes, and Pallets? Yes ☒ No ☐

Explain: They recycle aluminum, have cardboard baler for recycling, scrap steel to recycler, wooden pallets to reconditioner

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	☒ Silica Blasting to Remove Paint (seldom used)
☒ Water Soluble Cutting Fluids	☐ Recycle Overspray
☐ In-Process Recycle (Ion Exchange, Reverse Osmosis)	☐ Conductivity Meters
☒ Air agitation in "treatment" tanks	☐ Bath / Rinse Filtration

Attachment C: Pretreatment System

Are wastestreams segregated before pretreatment? (Pretreatment not necessary) ☐ 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 ("as needed")	☐ Sand Trap	☒ Sedimentation	☐ Silver Recovery
☐ Belt/Disk Oil Skimmer	☐	☐	☐

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

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

System Operator(s) Name: Steve Johnstone's records are maintained on operator's daily log book containing extensive/daily pH/temperature/hardness readings and pH meter's calibration log records. Current log on pH calibration indicates time to change probes. Operator also keeps measurements on D.O. to determine if tanks need air agitation which will keep pH low (within City limits).

*See Attachment A-1 which was supplied during inspection. Facility rep indicated the wash bay would be moved in the near future.

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: Refer to Attachment A-2

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: 300 to 400 gallons per day (~2,000/week)

Describe process from which batch originated (spent bath, e.g.): alkaline/Fe phosphate cleaning spray and rinse

Approximate duration of batch discharge:

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

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

Describe Chemical Storage Area(s)	Are there floor drains in this area?	If yes, where does this drain lead to?
1. Main storage area contains the steel "prep" chems. They're all connected by hoses to manual hi-pressure wands used by operator to clean/phosphatize trailer frames. These chems are kept in a separate room in wire framed totes.	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
2. Paint mixing/storage area ("kitchen")	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
3. Paint storage "barn"	☐Yes ☒No	☐ Pretreatment ☐ Sanitary Sewer ☐ Storm Sewer
4. Drums of Primer (next to back oven)	☐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 ("pig mats")	☐ Notification Procedures
☐ Chemical desegregation within Storage Area	☒ Other: Floor is sloped to the middle of the building

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: SteelPrep 300 and SteelPrep 400 (alkaline and phosphoric acid chems). See Attachment A-3

Chemical storage comments: Adequate. Chemicals stored are not in huge volumes. Paint "kitchen" is built to hold entire volume of paints in the room. Room is well ventilated and meets with the national fire exposure code with only one person responsible for mixing different paints to get desired final color. That small amount of finished paint is passed through a window to a person in the paint booth on the other side of the wall. Paint mixing room is actually a separate room within the building. It's designed with to contain entire volume of the paint in the numerous cans. ~3,300 active/current colors they can make.

Chemical handling procedures (totes, dolly, buckets, hardline, etc): 330 gallon totes (forklifted in) for wash chems, drum dollies, auto mix -lids for primer drums.

Attachment E: Spill/Slug Control Plan	
Does the facility have a Spill/Slug control plan? ***Evaluation determined a slug potential was not present***	☐ 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
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? N/A	☐ yes ☐ no
Is it posted in areas where chemicals are used and stored? N/A	☐ yes ☐ no
If Yes how many? N/A	
Are appropriate personnel provided training in the event of a spill or slug discharge? N/A	☐ 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: ~2" PVC piping from bottom of one of the 2 "treatment" tanks empties directly to sewer system. There's a "T" at the end of this pipe, both have valves, one for taking samples and the other for batch discharging to the City. See Attachment A-2 for pictures of (now enclosed room) sampling point which now includes the "T" and red sampling valve.	
Total Flow Monitoring Point: Batch discharges are estimated by using marks on fiberglass tanks. Marks are in 1000 gallon increments.	
Upstream Manhole: N/A	
Point of Connection: Direct connection to City's sewer system.	

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.

Steve washes a large pyrex measuring cup with City supplied RO water. He then opens valve to the City and collects enough liquid for samples and then places them on ice. Sample bottles are prepared/preserved by contract lab.

Where is the sample point located? At the N.E. corner of the "treatment" tank room. See Attachment A-2 for picture (not completed with "T" and extra sampling valve)

☒ 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 Analytical, Inc., 11701 I-30, Bldg. 1, Suite 115, Little Rock, AR 72209

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? (IU began ops in '06)	☐ Yes ☐ No ☒ N/A

List the parameters the facility monitors and the frequency:

☒ Cd(t)	☒ Cu(t)	☒ Cr(t)	☒ Ni(t)	☒ Pb(t)
☒ Ag(t)	☒ Zn(t)	☒ pH	☒ CN^-(t)	☐ 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

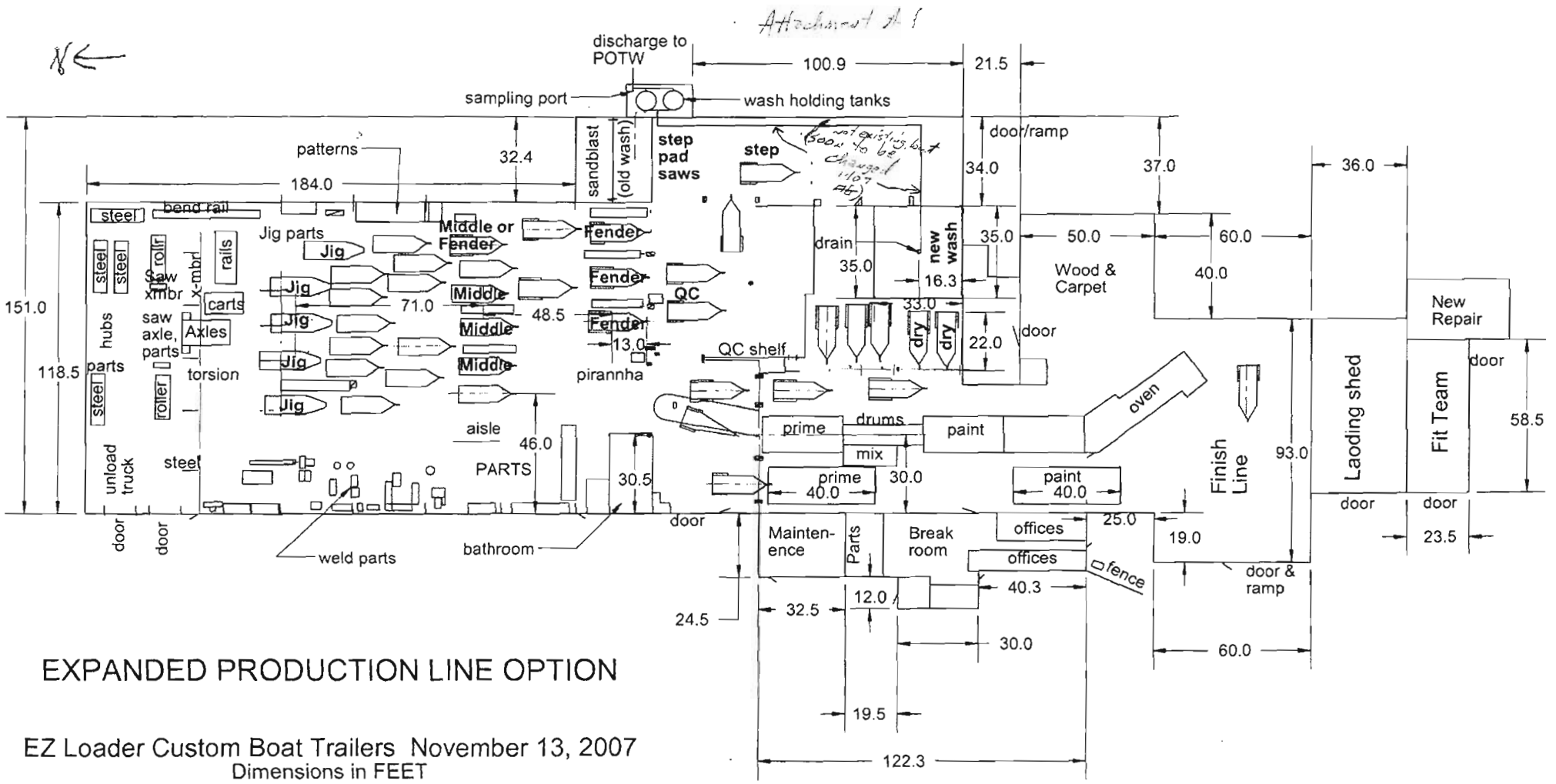
If yes, Does the plan show how toxic organics are used, stored, and disposed? ☐ Yes ☐ No ☒ N/A

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

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: A TOMP was discussed during site visit. IU rep has access to EPA's guidance manual. During walk thru of the facility, various organics, their volumes and how they were handled within the facility were discussed to help IU rep understand the intent of a TOMP. Even the handling of the trailers' brake fluids were discussed. IU rep was strongly encouraged to submit a TOMP for their small quantities and current practices.



EXPANDED PRODUCTION LINE OPTION

EZ Loader Custom Boat Trailers November 13, 2007

Dimensions in FEET

TRAILER WASHING

PRODUCTION PROCESS DESCRIPTION

EZ Loader Custom Boat Trailers

Midway, Arkansas

December 13, 2006

Attachment A-2

TRAILER PREP, BEFORE WASH:

* Grind any sharp edges on welds
* Use wire brush air tool on ALL welds, to remove any excess carbon residue at welds.

USE CAUTION WHEN OPERATING WIRE BRUSH AIR TOOL.

* Chip off all weld BBs (any not removed by wire brush).
* Use center post at front of cart, so that trailer front is higher than rear. This allows water to run out of rails.
* Wipe off any paint or oil based markings with acetone or wire brush, including under axle.
* For actuators with green coating, remove the green using acetone.
* Add masking to brake hubs at lube, but NOT studs or wheel mating surface (done after wash since the water will tear apart the masking disc).

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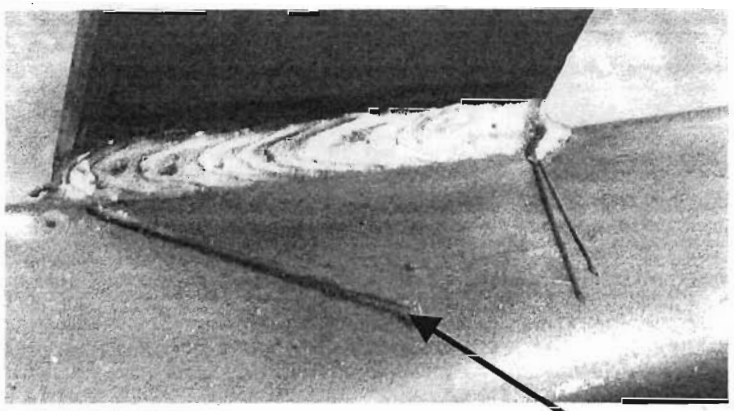
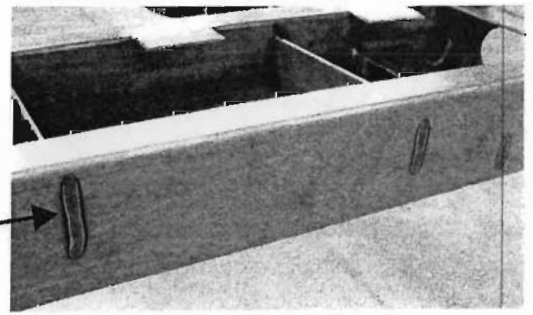


Before prep

Remove weld wire & BBs

Also use air brush tool here, at steps were gusset welds are seen

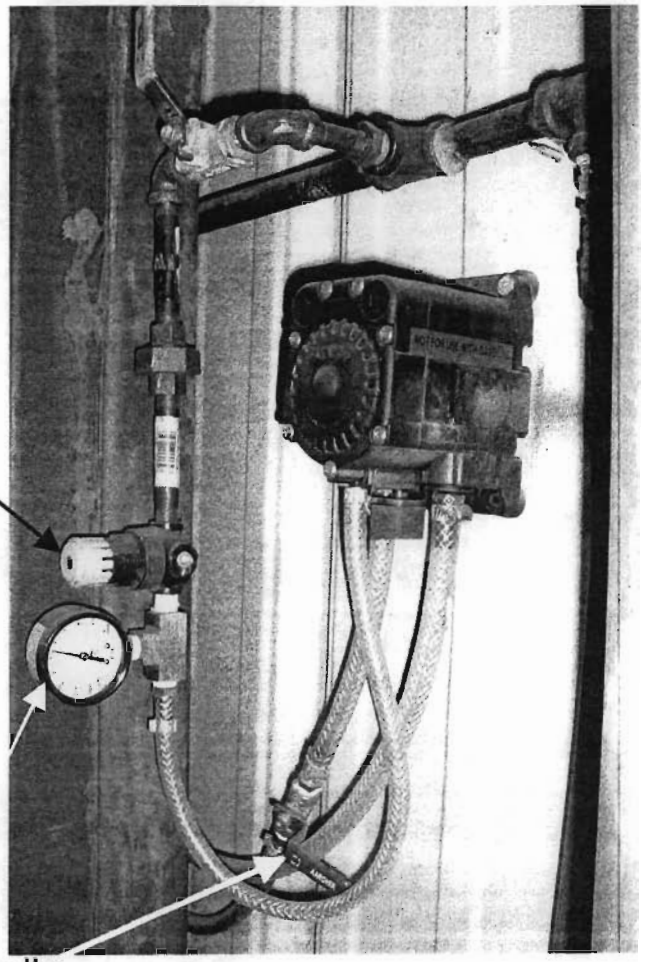


WASH SYSTEM DESCRIPTION:

Steel Prep 300, used for power wash

Steel Prep 400, used first, as degreaser & prep

A-26



To adjust pressure

Should be **50 psi** when spraying

Valves normally open (for Step 1 prewash). *Close at end of shift.*

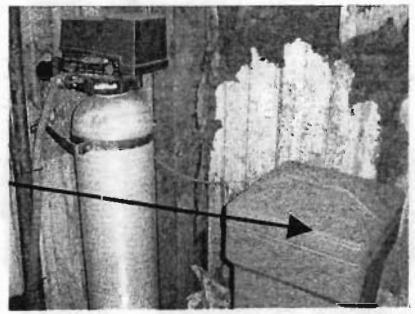
Prewash pressure setting, to right of wash booth entrance

When handling Steel Prep 300/400, avoid contact with eyes and skin.

First aid: for eyes, flush with water for 15 minutes and get medical attention. For skin contact, remove contaminated clothing. Wash skin with soap & water. Also wash clothing.

If spilled, ventilate spill area and dike and contain spill. Clean up with absorbent materials

Maintenance adds salt when needed, keep under 1/2 full



Water softener

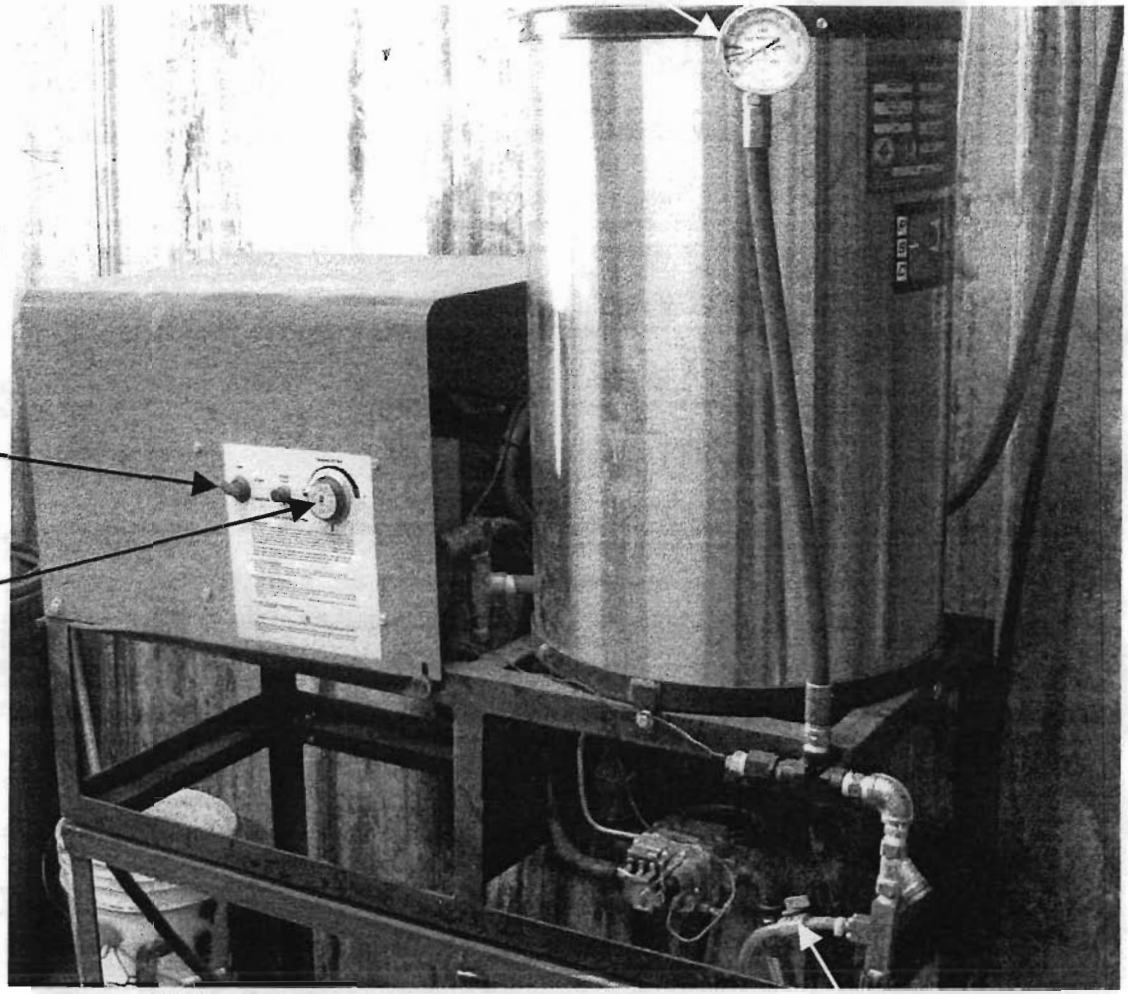
PROCESS DESCRIPTION:

Wear eye protection and boots, when washing trailers. Other items such as a rain coat are optional.

While power washing, temp must be **120-150 degrees F** (adjust using dial below)

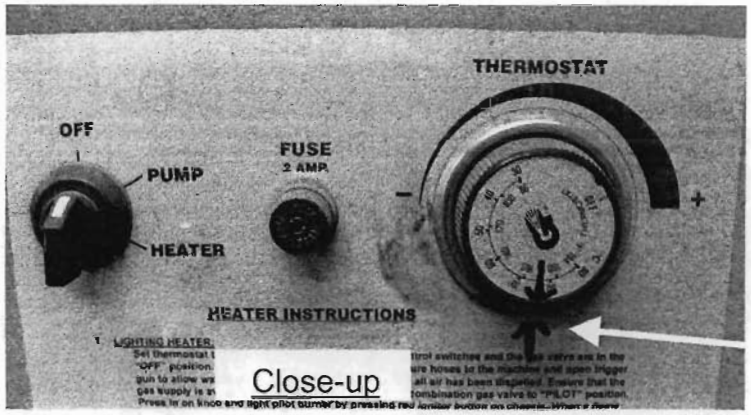
Turn switch to HEATER, except during breaks, lunch or down time, then turn OFF

Do not change temperature dial unless temperature during washing is not in the 120-150 degree F range (see close-up below)



Heating unit for wash fluid. Read instructions on front before using.

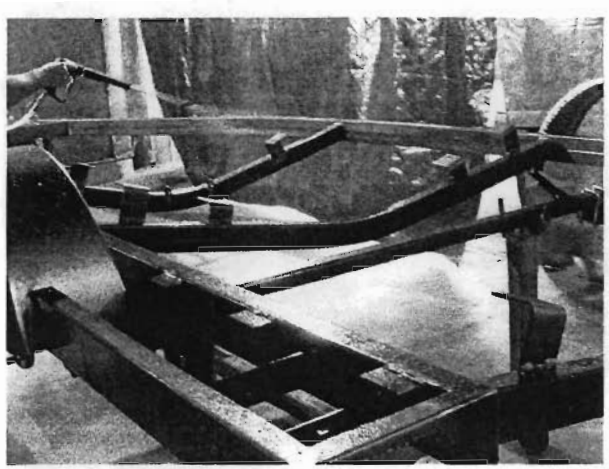
Valve normally open (gives soapy water)



Close-up

Arrows show normal setting, but may be adjusted if needed.

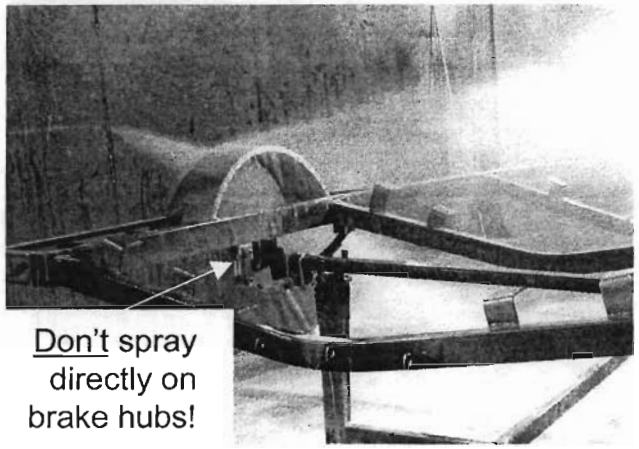
A-24



STEP 1: spray with low pressure degreaser (SteelPrep 400). Wet bottom surfaces first, and wet entire trailer.

Note: If the trailer sits for over ten minutes before power wash, spray it again with the step 1 degreaser.

STEP 2: spray with high pressure power wash gun, but with water only. Give the entire trailer a quick rinse. (This allows the phosphate wash to bond with the metal better.)



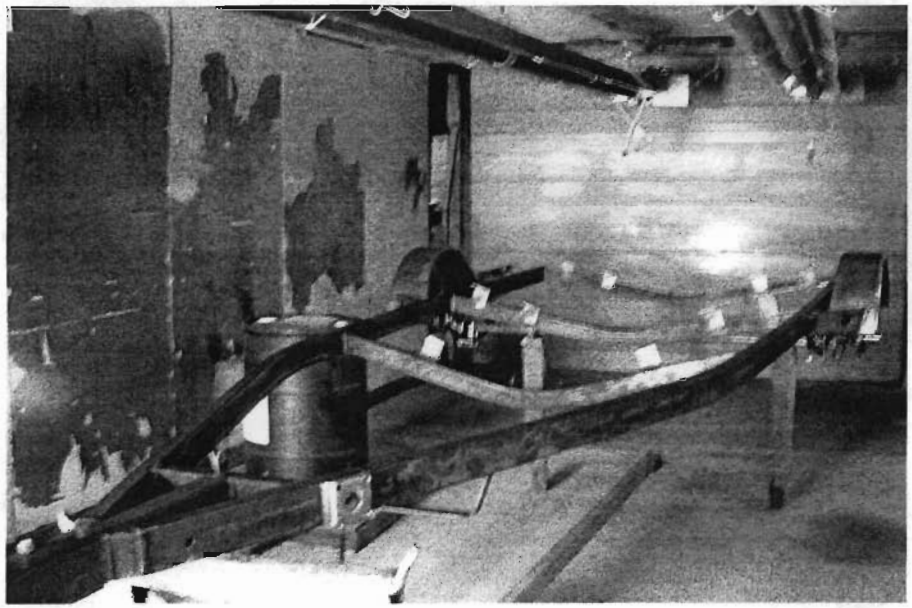
Don't spray directly on brake hubs!

STEP 3: Power wash with soap (SteelPrep 300 & water), with high pressure gun **nozzle about 6" from trailer** (4-8"). First spray the floor until flow is warm, then spray trailer. Spray with back and forth motion, as if scrubbing. *Use care that every surface of the trailer (all sides) are sprayed, including the bottom surfaces.*

A-22

STEP 4: On spray gun, turn valve OFF to stop soapy flow. Spray on ground a short time until soap stops, then give a light quick rinse. STAND BACK FROM TRAILER, SPRAY JUST ENOUGH TO FLUSH OFF SOAP SUDS.

Wear eye protection & protective clothing.

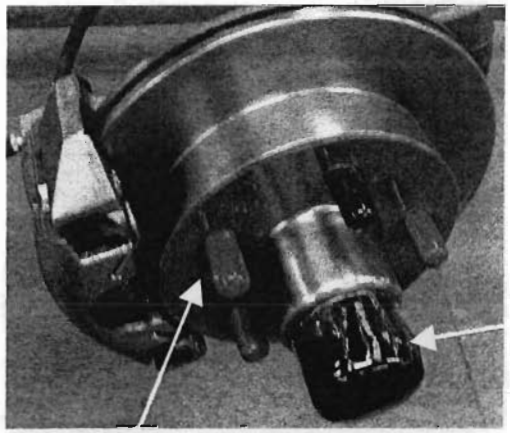


After wash, move trailer to drying area and **blow off with air,** beginning with Fenders and blowing entire trailer. Don't forget the center of crossmembers (collects water), **springs or torsion axles** and blow inside rails (from front) and rear crossmember if oval light holes cutout.

Use acetone (but do not use cloth, it leaves lint) to wipe off any rust, and clean any spots missed by power wash.

Ear plugs are recommended for blow drying.

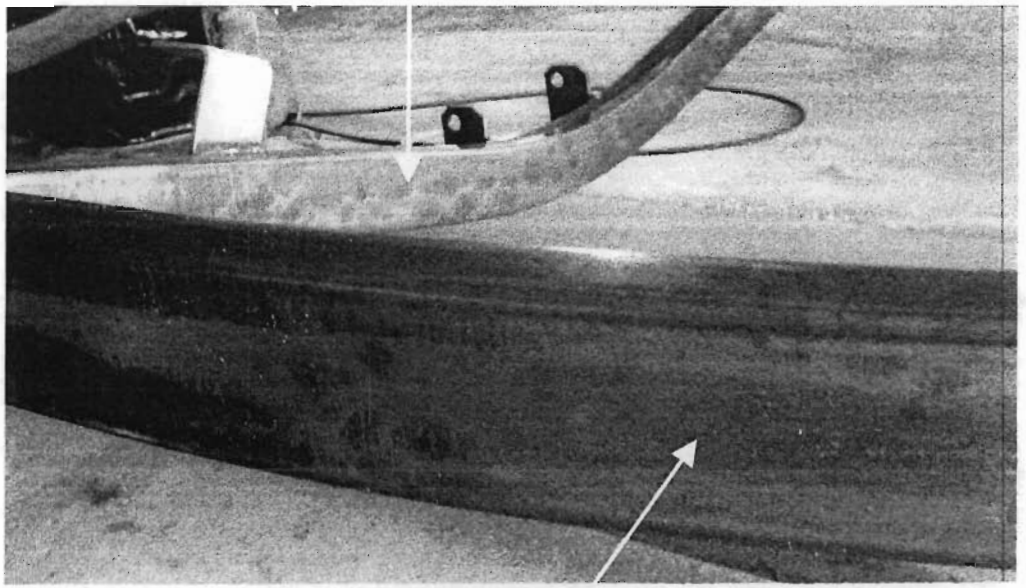
A-2-f



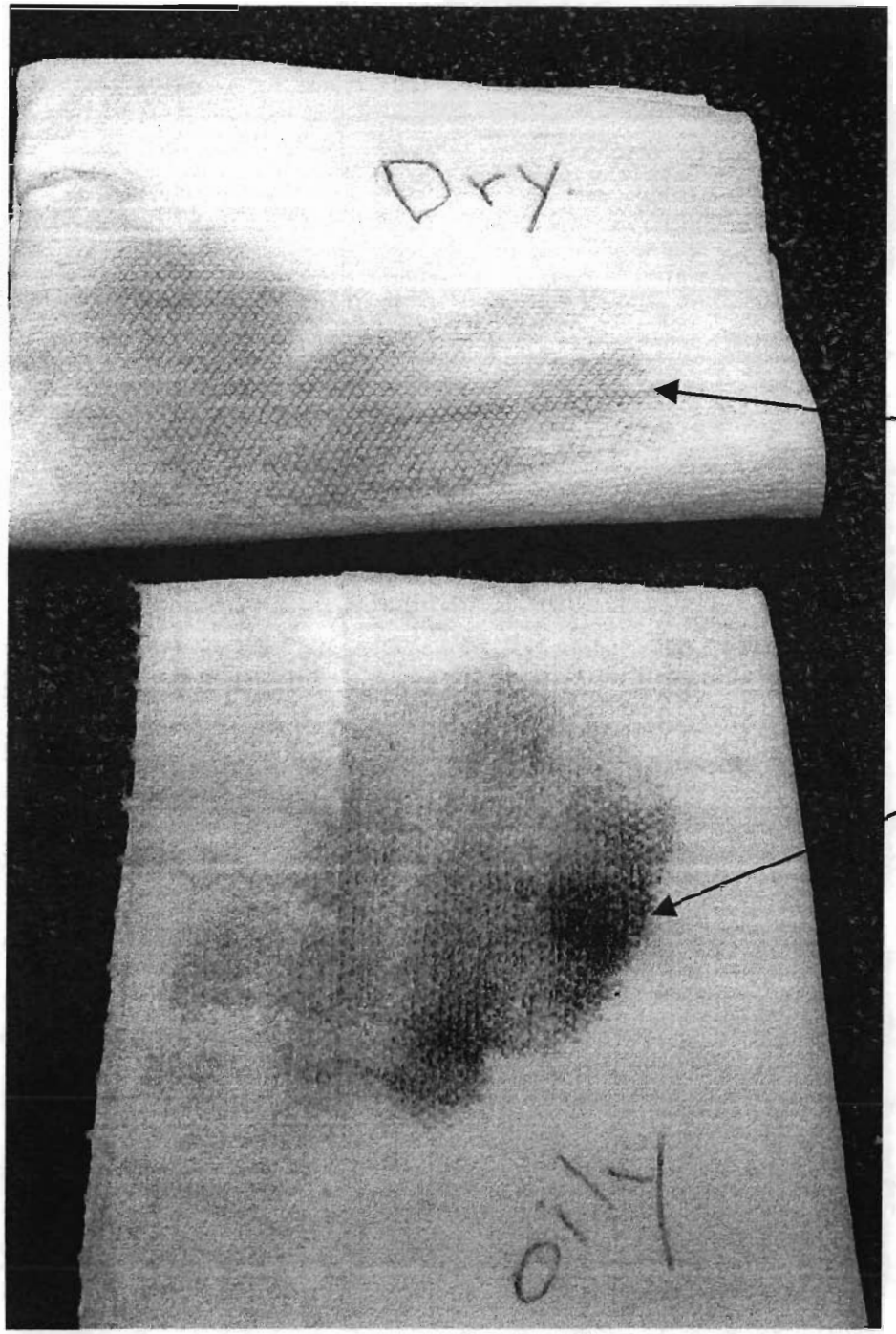
This end cap masking is done <u>before</u> wash

Add masking to hub mounting surface and stud caps, before moving trailer out of dry area.

Surface of trailer should look like this (different shades)



This area was missed by power wash, so clean with acetone



After washing and drying, DO NOT wipe trailer with a cloth, it leaves lint which shows up in the paint. However, for a quality check of an occasional trailer, wipe the bottom of a rail or crossmember. See notes below.

This is light, dry carbon, it is acceptable.

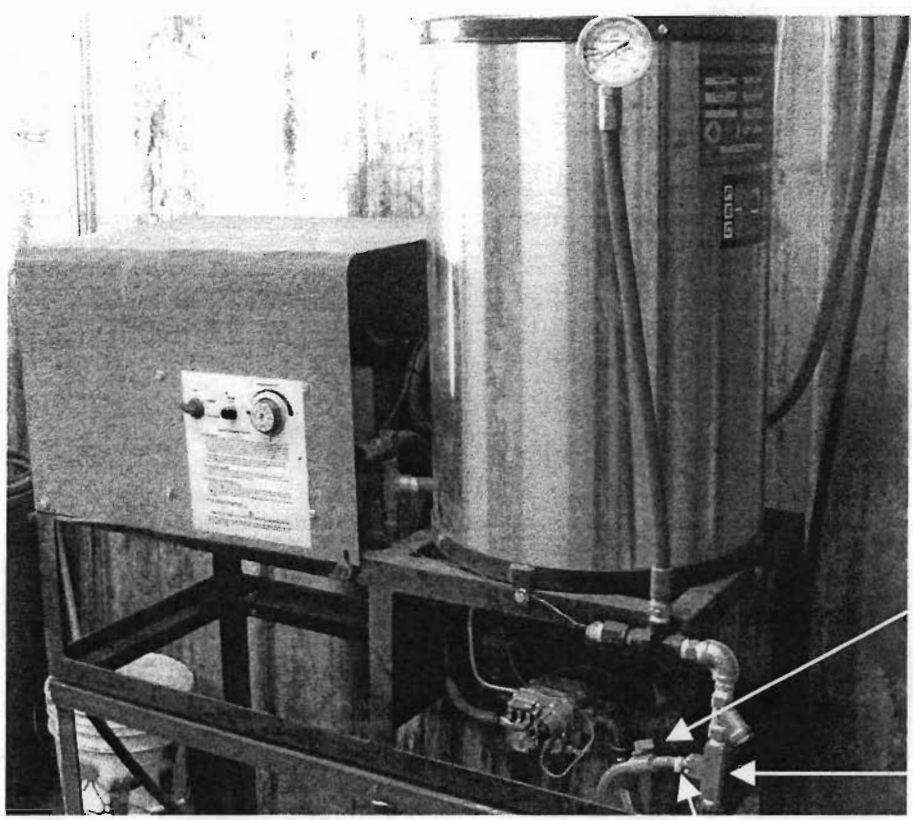
This is a wet, oily substance, it is NOT ACCEPTABLE on washed trailers.

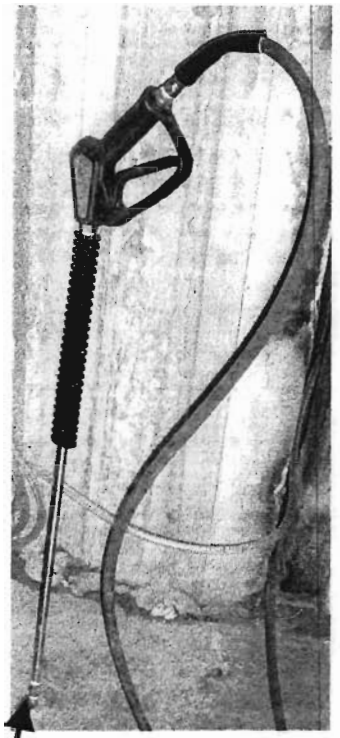
It must be cleaned off with acetone (use gloves), or the trailer re-washed.

A-23

MAINTENANCE:

Notify maintenance if any problems occur with the equipment, such as improper flow rate, leaks or malfunctions.





Pump flow rate is 5.4 gallons per minute, with 2% SteelPrep 300.

There is a special orifice here. If it gets clogged, or if power wash nozzle is bad, a light white phosphate dust will be seen on the trailer.

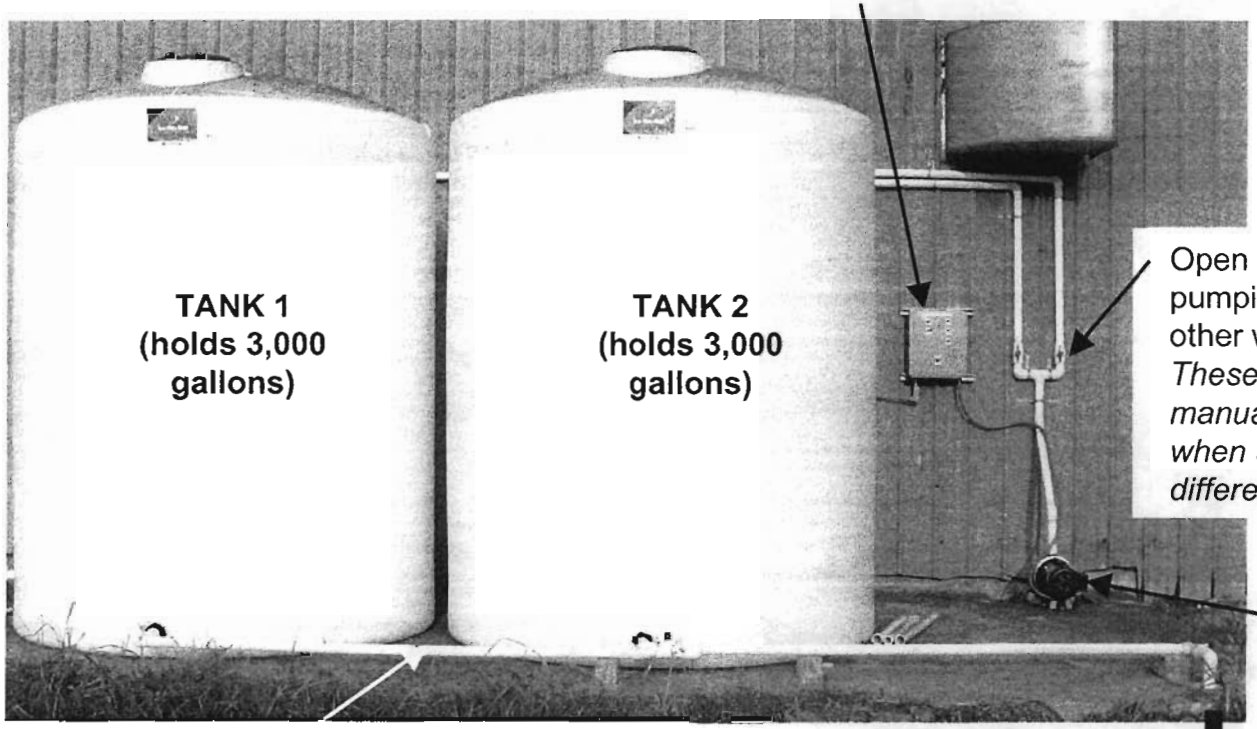
REPLACE POWER WASH NOZZLE EVERY 30 DAYS.

Note: For the power wash, the ratio of SteelPrep 300 to water should be 2%. This could be changed if the nozzle is damaged or not replaced monthly, or if the above orifice or injector are damaged. To test the ratio, remove the suction line from the SteelPrep 400 tank and place in a cup of water, and turn on power wash for 15 seconds, noting how much fluid is pumped from the cup.

A-21

PROCESS DESCRIPTION: Water treatment and discharge

(see next page for control panel)



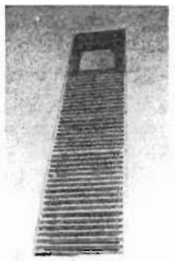
Open this valve when pumping to TANK 1 (the other will be closed). *These valves must manually be changed when switching to a different tank.*

Pump

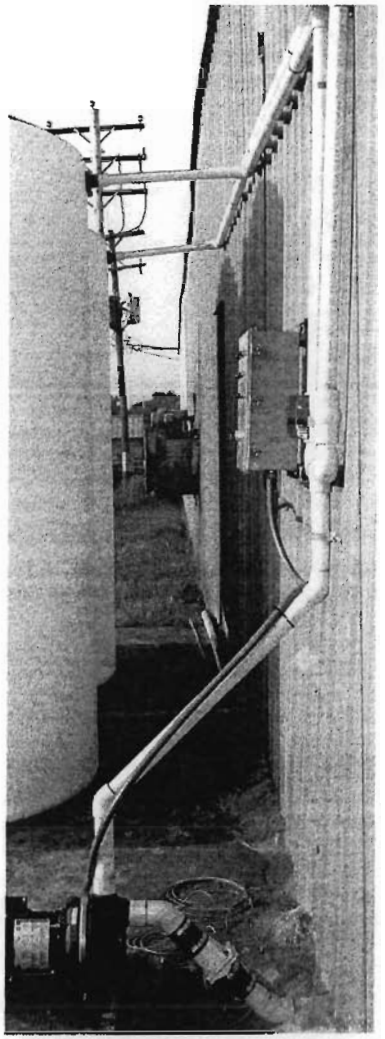
(see next page for discharge lines)

(photos taken before enclosure room was built)

Piping discharge to city line



Floor drain in wash booth

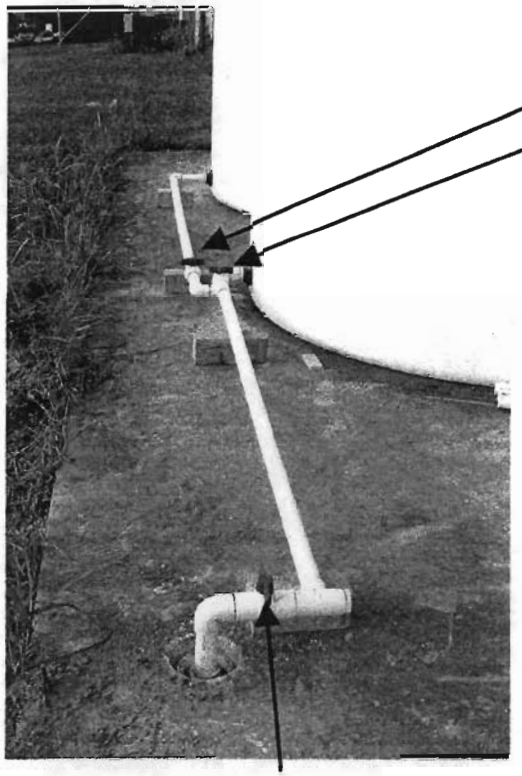


Side View

A-21

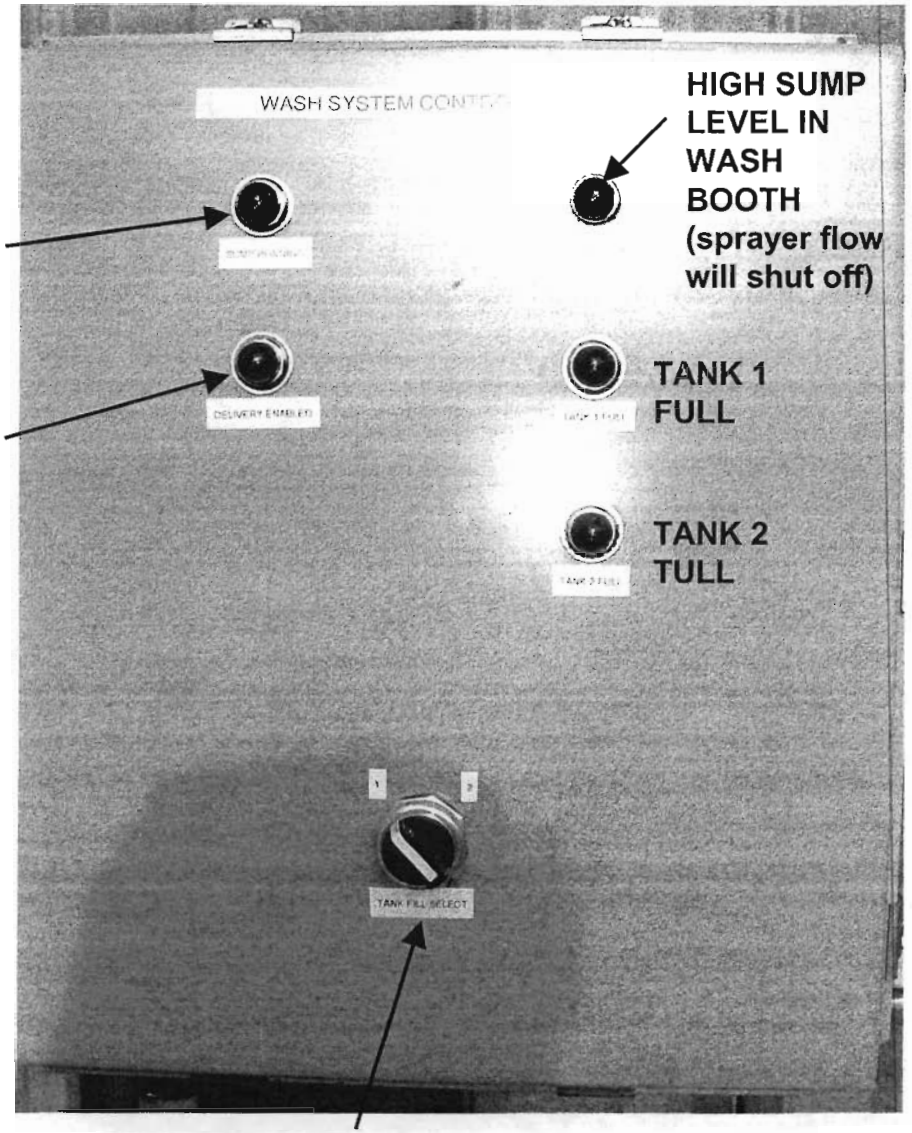
PROCESS: Cleaning water from wash booth drain is pumped to the top of a holding & treatment tank. When one tank is full, switch to the other tank. For the full tank, with tank agitated, fluid is sampled and pH must be 6 - 9 before it can be drained.

If low pH, add sodium hydroxide or caustic soda. If high pH, *slowly* add sulfuric acid. Tank must be agitated and pH tested repeatedly until 6-9 range. Then discharge valve are opened to drain tank.



Discharge line valves MUST REMAIN CLOSED, except when adjusting pH and draining tank.

VALVE MUST REMAIN CLOSED, UNLESS pH IS ACCEPTABLE AND TANK IS BEING DRAINED



Green light means sump pump is running

"Delivery Enabled" means tank is ok to pump into

HIGH SUMP LEVEL IN WASH BOOTH (sprayer flow will shut off)

TANK 1 FULL

TANK 2 TULL

Selection switch for Tank 1 or 2, WHEN SWITCHING TANKS, YOU MUST ALSO CLOSE AND OPEN THE CORRECT VALVES ABOVE THE PUMP (see previous page)

Note: when a tank is full, a sensor will automatically shut off the spray gun in the wash booth. An operator must then turn the selection switch (shown on right) **AND** also close the valve for the full tank and open the inlet valve for the empty tank (see valves at pump on previous page).

Attachment A-3

Material Safety Data Sheet
SteelPrep 300

SECTION I - MANUFACTURER INFORMATION

ENCHEM CORPORATION
1458 TIMBERLINE ROAD
KINGSTON, OK, USA 73439
580-564-2725

EMERGENCY TELEPHONE: 1-800-424-9300
DATE PREPARED: 02-15-1994

CHEMICAL NAME & SYNONYMS: PROPRIETARY CHEMICAL FORMULATION
FORMULA: CONCENTRATE BLEND
DOT SHIPPING DESCRIPTION: COMPOUNDS, CLEANING LIQUID (CONTAINING PHOSPHORIC ACID), 8, NA1760, PG II

SECTION II – COMPOSITION/INGREDIENTS

CONTAINS:

MATERIAL	QUANTITY	CAS-#
Water	Water base	7732-18-5
Phosphoric Acid	0 - 15%	7664-38-2 [231-633-2]
Sodium Hydroxide	0 – 5%	1310-73-2
Sodium Xylene Sulfonate	0 – 5%	1300-72-7
Nonylphenol Ethoxylate	0 – 5%	9016-45-9 [215-185-5]

SECTION III – HAZARDS IDENTIFICATION

RISK STATEMENTS:
R36 Irritating to eyes.

SAFETY STATEMENTS:
S24/25 Avoid contact with skin & eyes.

SECTION IV – FIRST AID MEASURES

EYE CONTACT:
For eyes, flush with plenty of water for 15 minutes & get medical attention.

SKIN CONTACT:
In case of contact with skin, immediately remove contaminated clothing. Wash thoroughly with soap & water. Wash contaminated clothing before reuse.

INHALATION:
After high vapor exposure, remove to fresh air. If breathing is difficult, give oxygen. If breathing has stopped, give artificial respiration.

SWALLOWING:
If swallowed, CALL A PHYSICIAN IMMEDIATELY! Induce vomiting promptly using physician's instructions or by having patient stick finger down throat. Never give anything by mouth to an unconscious person.

SECTION V – FIRE FIGHTING MEASURES

EXTINGUISHING MEDIA:
Use appropriate extinguishers for surrounding fires.

SPECIAL FIRE FIGHTING PROCEDURES:
Do not enter confined fire-space without full bunker gear. (Helmet with face shield, bunker coats, gloves & rubber boots). Use NIOSH approved positive-pressure self-contained breathing apparatus.

UNUSUAL EXPLOSION AND FIRE PROCEDURES
Noncombustible.

Keep container tightly closed.
Closed containers may rupture if exposed to extreme heat.
Applying to hot surfaces requires special precautions.

SECTION VI – ACCIDENTAL RELEASE MEASURES

CONTAINMENT TECHNIQUES:

Keep unprotected personnel away. Wear appropriate personal protective equipment given in Section VIII. Ventilate spill area. Stop spill at source. Dike and contain.

CLEAN-UP PROCEDURES:

Clean up remainder with absorbent materials. Mop up & dispose of.

SECTION VII – HANDLING AND STORAGE

HANDLING:

Use only with adequate ventilation. Wear OSHA Standard goggles or face shield. Consult Safety Equipment Supplier. Wear gloves, apron & footwear impervious to this material. Wash clothing before reuse.

STORAGE:

Do not store above 49*C/120*F. Keep container tightly closed & upright when not in use to prevent leakage.

SECTION VIII – EXPOSURE CONTROLS / PERSONAL PROTECTION

RESPIRATORY EXPOSURE CONTROLS:

A respiratory protection program that meets OSHA 29 CFR 1910.134 and ANSI Z86.2 requirements or European Standard EN 149 must be followed whenever workplace conditions warrant a respirator's use.

VENTILATION:

Local Exhaust:	Necessary
Mechanical (general):	Accepatable
Special:	None
Other:	None

Please refer to ACGIH document "Industrial Ventilation, A Manual of Recommended Practices", most recent edition, for details.

PERSONAL PROTECTION:

Wear OSHA Standard goggles of face shield - consult Safety Equipment Supplier. Wear gloves, apron & footwear impervious to this material. Wash clothing before reuse.

WORK & HEGIENIC PRACTICES:

Provide readily accessible eye wash stations & safety showers. Wash at end of each workshift & before eating, smoking or using the toilet. Promptly remove clothing that becomes contaminated. Destroy contaminated leather articles. Launder or discard contaminated clothing.

SECTION IX – PHYSICAL DATA

APPEARANCE:	Liquid, milky
ODOR:	Slight surfactant odor
BOILING POINT:	100*C/212*F
AUTO-IGNITION POINT:	N/A
FLASH POINT:	N/A
FLAMMABILITY CLASSIFICATION:	Non-combustible
SPECIFIC GRAVITY:	1.087
POUNDS PER GALLON:	9.055
TOTAL VOC'S (TVOC):	0.000 lbs/gal
HAZARDOUS AIR POLLUTANTS:	0.000 lbs/gal
VAPOR PRESSURE:	17.5
VAPOR DENSITY:	0.6
SOLUBILITY IN WATER:	SOLUBLE
pH (1% solution):	4.0
EVAPORATION RATE (WATER = 1)	1

SECTION X – STABILITY & REACTIVITY

STABILITY:

Stable under normal conditions.

CONDITIONS TO AVOID:

N/A

MATERIALS TO AVOID:

Strong oxidizers such as permanganates, chromates & peroxides.

HAZARDOUS DECOMPOSITION PRODUCTS:

Phosphorus Pentoxide, Sodium Oxide & Hydroxide, Carbon Oxides from heating.

HAZARDOUS POLYMERIZATION:

Will not occur.

SECTION XI – TOXICOLOGICAL INFORMATION

MATERIAL	CAS#	TWA (OSHA)	TLV (ACGIH)	HAP
Water	7732-18-5	None known	None known	No
Phosphoric Acid	7664-38-2	None known	None known	No
Sodium Hydroxide	1310-73-2	None known	None known	No
Sodium Xylene Sulfonate	1300-72-7	None known	None known	No
Nonylphenol Ethoxylate	9016-45-9	None known	None known	No

(This product contains no EPA Hazardous Air Pollutants (HAP) in amounts > 0.1%

MATERIAL	CAS#	CEILING	STEL (OSHA/ACGIH)
Phosphoric Acid	7664-38-2	None known	3ppm
Sodium Hydroxide	1310-73-2	2ppm	None known

(Most of the Phosphoric Acid and Sodium Hydroxide has reacted in use to become nonhazardous Monosodium Phosphate)

Wastewaters produced by use of this product at recommended concentrations yield pH & total phosphorus values within acceptable regulatory levels.

ACUTE HAZARDS

EYE & SKIN CONTACT:
Primary irritation to skin, defatting, dermatitis. Primary irritation to eyes, redness, tearing, blurred visions. Liquid can cause eye irritation. Wash thoroughly after handling.

INHALATION:
Anesthetic. Irritates respiratory tract. Acute overexposure can cause serious nervous system depression. Vapor harmful.

SWALLOWING:
Swallowing can cause abdominal irritation, nausea, vomiting & diarrhea.

CHRONIC HAZARDS

CANCER, REPRODUCTIVE & OTHER CHRONIC HAZARDS:
This product has no carcinogens listed by IARC, NTP, NIOSH, OSHA or ACGIH, as of this date, greater than or equal to 0.1%

SECTION XII – ECOLOGICAL INFORMATION

MAMMALIAN INFORMATION:
No mammalian information is available on this product.

AQUATIC ANIMAL INFORMATION:
No aquatic animal information is available on this product.

MOBILITY:
Mobility of this material has not been determined.

DEGRADABILITY:
This product is completely biodegradable.

ACCUMULATION:
Bioaccumulaton of this product has not been determined.

SECTION XIII – DISPOSAL CONSIDERATIONS

Processing, use or contamination may change the waste management options. Recycle/dispose of observing national, regional, state, provincial and local health, safety & pollution laws. If in doubt, contact appropriate agencies.

SECTION XIV – REGULATORY INFORMATION

EPA REGULATIONS:
SARA SECTION 311/312 HAZARDS: Acute health.

All components of this product are on the TSCA list. SARA Title III Section 313 Supplier Notification. This product contains the indicated <*> toxic chemicals subject to the reporting requirements of Section 313 of the Emergency Planning & Community Right-To-Know Act of 1986 & of CFR 372. This information must be included in all MSDSs that are copied and distributed for this material. This product meets requirements of Southern California AQMD Ruler 443.1 & similar regulations.

SECTION XV – OTHER INFORMATION

HAZARD RATINGS:
Health (NFPA): 1 Health (HMIS) 0 FLAMMABILITY: 0 REACTIVITY: 0
This information is intended solely for the use of individuals trained in the NFPA & HMIS hazard rating systems.

Material Safety Data Sheet
SteelPrep 400

SECTION I - MANUFACTURER INFORMATION

ENCHEM CORPORATION
1458 TIMBERLINE ROAD
KINGSTON, OK, USA 73439
580-564-2725

EMERGENCY TELEPHONE: 1-800-424-9300
DATE PREPARED: 02-15-1994

CHEMICAL NAME & SYNONYMS: PROPRIETARY CHEMICAL FORMULATION
FORMULA: CONCENTRATE BLEND
DOT SHIPPING DESCRIPTION: COMPOUNDS, CLEANING LIQUID (CONTAINING PHOSPHORIC ACID), 8, NA1760, PG II

SECTION II – COMPOSITION/INGREDIENTS

CONTAINS:

MATERIAL	QUANTITY	CAS-#
Water	Water base	7732-18-5
Trisodium Phosphate	0 - 10%	7601-54-9
Trisodium Citrate	0 - 10%	68-04-2
Nonylphenol Ethoxylate	0 - 5%	9016-45-9
Sodium Metasilicate	0 - 5%	6834-92-0
Sodium Hydroxide	0 - 5%	1310-73-2

SECTION III – HAZARDS IDENTIFICATION

RISK STATEMENTS:
R36 Irritating to eyes.

SAFETY STATEMENTS:
S24/25 Avoid contact with skin & eyes.

SECTION IV – FIRST AID MEASURES

EYE CONTACT:
For eyes, flush with plenty of water for 15 minutes & get medical attention.

SKIN CONTACT:
In case of contact with skin, immediately remove contaminated clothing. Wash thoroughly with soap & water. Wash contaminated clothing before reuse.

INHALATION:
After high vapor exposure, remove to fresh air. If breathing is difficult, give oxygen. If breathing has stopped, give artificial respiration.

SWALLOWING:
If swallowed, CALL A PHYSICIAN IMMEDIATELY! Induce vomiting promptly using physician's instructions or by having patient stick finger down throat. Never give anything by mouth to an unconscious person.

SECTION V – FIRE FIGHTING MEASURES

EXTINGUISHING MEDIA:
Use appropriate extinguishers for surrounding fires.

SPECIAL FIRE FIGHTING PROCEDURES:
Do not enter confined fire-space without full bunker gear. (Helmet with face shield, bunker coats, gloves & rubber boots). Use NIOSH approved positive-pressure self-contained breathing apparatus.

UNUSUAL EXPLOSION AND FIRE PROCEDURES
Noncombustible.

Keep container tightly closed.
Closed containers may rupture if exposed to extreme heat.
Applying to hot surfaces requires special precautions.

SECTION VI – ACCIDENTAL RELEASE MEASURES

CONTAINMENT TECHNIQUES:

Keep unprotected personnel away. Wear appropriate personal protective equipment given in Section VIII. Ventilate spill area. Stop spill at source. Dike and contain.

CLEAN-UP PROCEDURES:

Clean up remainder with absorbent materials. Mop up & dispose of.

SECTION VII – HANDLING AND STORAGE

HANDLING:

Use only with adequate ventilation. Wear OSHA Standard goggles or face shield. Consult Safety Equipment Supplier. Wear gloves, apron & footwear impervious to this material. Wash clothing before reuse.

STORAGE:

Do not store above 49*C/120*F. Keep container tightly closed & upright when not in use to prevent leakage.

SECTION VIII – EXPOSURE CONTROLS / PERSONAL PROTECTION

RESPIRATORY EXPOSURE CONTROLS:

A respiratory protection program that meets OSHA 29 CFR 1910.134 and ANSI Z86.2 requirements or European Standard EN 149 must be followed whenever workplace conditions warrant a respirator's use.

VENTILATION:

Local Exhaust:	Necessary
Mechanical (general):	Acceptable
Special:	None
Other:	None

Please refer to ACGIH document "Industrial Ventilation, A Manual of Recommended Practices", most recent edition, for details.

PERSONAL PROTECTION:

Wear OSHA Standard goggles of face shield - consult Safety Equipment Supplier. Wear gloves, apron & footwear impervious to this material. Wash clothing before reuse.

WORK & HEGIENIC PRACTICES:

Provide readily accessible eye wash stations & safety showers. Wash at end of each workshift & before eating, smoking or using the toilet. Promptly remove clothing that becomes contaminated. Destroy contaminated leather articles. Launder or discard contaminated clothing.

SECTION IX – PHYSICAL DATA

APPEARANCE:	Liquid, milky
ODOR:	Slight surfactant odor
BOILING POINT:	100*C/212*F
AUTO-IGNITION POINT:	N/A
FLASH POINT:	N/A
FLAMMABILITY CLASSIFICATION:	Non-combustible
SPECIFIC GRAVITY:	1.067
POUNDS PER GALLON:	8.891
TOTAL VOC'S (TVOC):	0.000 lbs/gal
HAZARDOUS AIR POLLUTANTS:	0.000 lbs/gal
VAPOR PRESSURE:	17.5
VAPOR DENSITY:	0.6
SOLUBILITY IN WATER:	SOLUBLE
pH (1% solution):	10.0
EVAPORATION RATE (WATER = 1)	1

SECTION X – STABILITY & REACTIVITY

STABILITY:

Stable under normal conditions.

CONDITIONS TO AVOID:

N/A

MATERIALS TO AVOID:

Strong oxidizers such as permanganates, chromates & peroxides.

HAZARDOUS DECOMPOSITION PRODUCTS:

Sodium Oxide, Hydroxide & Carbon Oxides from heating.

HAZARDOUS POLYMERIZATION:

Will not occur.

SECTION XI – TOXICOLOGICAL INFORMATION

MATERIAL	CAS#	TWA (OSHA)	TLV (ACGIH)	HAP
Water	7732-18-5	None known	None known	No
Trisodium Phosphate	7664-38-2	None known	None known	No
Trisodium Citrate	68-04-2	None known	None known	No
Nonylphenol Ethoxylate	9016-45-9	None known	None known	No
Sodium Metasilicate	6834-92-0	None known	None known	No
Sodium Hydroxide	1310-73-2	None known	None known	No

(This product contains no EPA Hazardous Air Pollutants (HAP) in amounts > 0.1%

MATERIAL	CAS#	CEILING	STEL (OSHA/ACGIH)
Sodium Hydroxide	1310-73-2	2ppm	None known

Wastewaters produced by use of this product at recommended concentrations yield pH & total phosphorus values within legal regulatory levels.

ACUTE HAZARDS

EYE & SKIN CONTACT:
Primary irritation to skin, defatting, dermatitis. Primary irritation to eyes, redness, tearing, blurred visions. Liquid can cause eye irritation. Wash thoroughly after handling.

INHALATION:
Anesthetic. Irritates respiratory tract. Acute overexposure can cause serious nervous system depression. Vapor harmful.

SWALLOWING:
Swallowing can cause abdominal irritation, nausea, vomiting & diarrhea.

CHRONIC HAZARDS

CANCER, REPRODUCTIVE & OTHER CHRONIC HAZARDS:
This product has no carcinogens listed by IARC, NTP, NIOSH, OSHA or ACGIH, as of this date, greater than or equal to 0.1%

SECTION XII – ECOLOGICAL INFORMATION

MAMMALIAN INFORMATION:
No mammalian information is available on this product.

AQUATIC ANIMAL INFORMATION:
No aquatic animal information is available on this product.

MOBILITY:
Mobility of this material has not been determined.

DEGRADABILITY:
This product is completely biodegradable.

ACCUMULATION:
Bioaccumulaton of this product has not been determined.

SECTION XIII – DISPOSAL CONSIDERATIONS

Processing, use or contamination may change the waste management options. Recycle/dispose of observing national, regional, state, provincial and local health, safety & pollution laws. If in doubt, contact appropriate agencies.

SECTION XIV – REGULATORY INFORMATION

SARA TITLE III INGREDIENTS	CAS#	WT. %	REG. SECTION	RQ (LBS)
Trisodium Phosphate	7601-54-9	< 5.0%	311 , 312	5000
Sodium Hydroxide	1310-73-2	< 2.0%	311 , 312	1000

> 51810 lb / 23550 kg of this product in 1 container exceeds the "RQ" of Sodium Hydroxide.

Any release equal to or exceeding the RQ must be reported to the National Response Center (800-424-8802) and appropriate state and local regulatory agencies as described in 40 CFR 302.6 and 40 CFR 355.40 respectively. Failue to report may result in substantial civil and criminal penalties. State & local regulations may be more restrictive than federal regulations.

This product meets requirements of Southern California AQMD Rule 443.1 & similar regulations.

SECTION XV – OTHER INFORMATION

HAZARD RATINGS:
Health (NFPA): 1 Health (HMIS) 0 FLAMMABILITY: 0 REACTIVITY: 0
This information is intended solely for the use of individuals trained in the NFPA & HMIS hazard rating systems.

Attachment A-4

Company Name

Company Address
Phone: Fax:

- CERTIFICATE OF ANALYSIS -

Attn: **Phone:** **Ext:**
FAX:

Our Lab#: 2007-2869
Your Sample ID: EZ Loader Boat Trailers
Sample Type: **Report Date:** 03-Dec-07

ICP/MS-T

Aluminum		618	µg/L	11/28/2007
Antimony	<	50.0	µg/L	11/28/2007
Arsenic		32.5	µg/L	11/28/2007
Barium		72.5	µg/L	11/28/2007
Beryllium	<	2.50	µg/L	11/28/2007
Boron		2250	µg/L	11/28/2007
Cadmium	<	5.00	µg/L	11/28/2007
Calcium		9.65	mg/L	11/28/2007
Chromium		29.9	µg/L	11/28/2007
Cobalt		5.59	µg/L	11/28/2007
Copper		550	µg/L	11/28/2007
Iron		6470	µg/L	11/28/2007
Lead		5.91	µg/L	11/28/2007
Magnesium		18.0	mg/L	11/28/2007
Manganese		218	µg/L	11/28/2007
Nickel		26.9	µg/L	11/28/2007
Potassium		3.87	mg/L	11/28/2007
Selenium	<	10.0	µg/L	11/28/2007
Silicon Dioxide		62.1	mg/L	11/28/2007
Silver	<	25.0	µg/L	11/28/2007
Sodium		1170	mg/L	11/28/2007
Thallium	<	12.5	µg/L	11/28/2007
Vanadium	<	12.5	µg/L	11/28/2007
Zinc		367	µg/L	11/28/2007