

## Gilliam, Allen

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**From:** Kevin Campbell <KCampbell@ezloader.com>  
**Sent:** Tuesday, January 17, 2012 8:32 AM  
**To:** Gilliam, Allen  
**Cc:** aclark@cityofmountainhome.com  
**Subject:** AR0021211\_EZ Boat Loader ARP001055 Dec 2011 semi annual Pretreatment Report with Zn violations and corrective action plan\_20120118  
**Attachments:** Semi annual water report form December 2011.doc; [NEWSENDER] - WW Results (12/7/11); [NEWSENDER] - Effluent Metals Results (12/20/11)

Allen,

Please find attached this facilities semi-annual report, we have opted to report electronically.

We are still working to isolate where the spike in our Zinc levels came from. The sump in the wash bay was not being cleaned regularly by the operators, so we cleaned it out last Friday and got them back on schedule. Our maintenance team worked yesterday and is working today to clean the inside of the holding tanks. I will pull a sample of effluent on Wednesday and overnight it to the lab, hopefully the results will be good news. I have the filter housing and cartridges in-house. If the third set of samples yields high Zinc levels, we will install the filter, and pull a fourth set of samples. Our vendor assures me that, based on the filters performance at other facilities, our levels will fall to well below the limit. I'm going to reserve the filter as my last option though. The housing is \$1,000.00 and the cartridges are \$300.00 each. If I can find the source of Zinc in the process and address or remove it there, I prefer to. I'll send an updated schematic to each of you if I have to install the filter.

I will share sampling results with each of you as I get them back. Please call if you need anything else at this time.

Thanks,  
Kevin

*Kevin Campbell  
Compliance Manager  
EZ Loader Custom Boat Trailers, Inc.  
800-553-7855 ext. 259  
870-404-4629 cellular  
870-481-5150 fax  
kcampbell@ezloader.com*

-----Original Message-----

**From:** Gilliam, Allen [mailto:GILLIAM@adeq.state.ar.us]  
**Sent:** Friday, January 13, 2012 11:49 AM  
**To:** Kevin Campbell  
**Cc:** mt. home alma clark; Henderson, Katie  
**Subject:** AR0021211\_EZ Boat Loader ARP001055 Dec 2011 semi annual Pretreatment Report 2nd analytical results violation reply\_20120112

Kevin,

The second analysis of your regulated wastewater does indicate another zinc violation of the Metal Finishing standards in 40 CFR 433.17. Under the criteria of 40 CFR 403.8(f)(2)(vii), "[EZ Boat Loader] is in significant noncompliance [SNC] if its violation meets one or more of the following criteria:

- (A) Chronic violations of wastewater Discharge limits, defined here as those in which 66 percent or more of all of the measurements taken for the same pollutant parameter during a 6-month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement..."

As mentioned in previous correspondence (below), "under 40 CFR 403.12(g)(2), 'If sampling performed by [EZ Boat] indicates a violation, [EZ Boat] shall notify [ADEQ] within 24 hours of becoming aware of the violation. [EZ Boat] shall also repeat the sampling and analysis and submit the results of the repeat analysis to [ADEQ] within 30 days after becoming aware of the violation.'"

As you have alluded to below, EZ Boat must continue to conduct sampling and analysis within thirty (30) days until the zinc excursions cease. Please continue to submit the analysis to this office as well as your normal semi-annual report stating what corrective action EZ Boat is taking to rectify the zinc violations.

I certainly hope you can discover and eliminate the source of zinc and/or your "filter" will abate these excursions soon.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Alma Clark, Director, Water & Sewer Services, City of Mountain Home

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**From:** Kevin Campbell [<mailto:KCampbell@ezloader.com>]  
**Sent:** Wednesday, January 11, 2012 1:33 PM  
**To:** Gilliam, Allen  
**Subject:** RE: AR0021211\_EZ Boat Loader (ARP001055) Dec 2011 semi annual Pretreatment Report analytical results reply\_20111220

Allen,

These are the results from the repeat sampling. Zinc was even higher the second sample. Still searching on my end, looking at process and product but alot of dead ends so far. I am awaiting the arrival of the filter we discussed, but would still prefer to know why things shifted so much. I will pull a 3rd set of samples soon and make you aware of the findings. Please let me know if you require anything else at this time.

Thank you,

*Kevin Campbell*  
*Compliance Manager*  
*EZ Loader Custom Boat Trailers, Inc.*  
*800-553-7855 ext. 259*  
*870-404-4629 cellular*  
*870-481-5150 fax*  
[kcampbell@ezloader.com](mailto:kcampbell@ezloader.com)

-----Original Message-----

**From:** Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]  
**Sent:** Tuesday, December 27, 2011 9:29 AM  
**To:** Kevin Campbell  
**Cc:** mt. home alma clark  
**Subject:** [NEWSENDER] - AR0021211\_EZ Boat Loader (ARP001055) Dec 2011 semi annual Pretreatment Report analytical results reply\_20111220

Kevin,

The electronic submittal of your December 2011 semi-annual Pretreatment report results (Arkansas Analytical's) was received and reviewed. As per our phone conversations on 12/20 your Zinc level (4.37 mg/l) violated the Metal Finishing Standards in 40 CFR 433.17 (1.48 mg/l). This is quite an aberration from your previous semi-annual reports typically showing Zinc levels from ~0.2 to 1.2 mg/l (from 8/07 to present).

[Please electronically provide a full semi-annual report on the form you previously use with a cover letter and the signatory authority's (Gary Potter?) legible signature below the appropriate certification statements.]

Your reporting requirements under 40 CFR 403.12(g)(2), "If sampling performed by [EZ Boat] indicates a violation, [EZ Boat] shall notify [ADEQ] within 24 hours of becoming aware of the violation. [EZ Boat] shall also repeat the sampling and analysis and submit the results of the repeat analysis to [ADEQ] within 30 days after becoming aware of the violation." has been and will be met per your below correspondence and per our phone conversation today.

Looking at the City's potable water levels of Zinc (0.205 mg/l), it is doubtful your subsequent Zinc analysis will bring your December monthly average below the Metal Finishing Monthly Average not to exceed of 1.48 mg/l. Even two more samples during December of just tap water might not bring your Zinc numbers below the "monthly avg. not to exceed" if the City's Zinc levels remain near 0.205 mg/l.

Please keep this office apprised of any new information you might discover from your internal investigation of any recent changes in raw material or chemicals.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Alma Clark, Director, Water & Sewer Services, City of Mountain Home

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**From:** Kevin Campbell [<mailto:KCampbell@ezloader.com>]  
**Sent:** Tuesday, December 20, 2011 11:04 AM  
**To:** Gilliam, Allen  
**Subject:** FW: WW Results (12/7/11)

Mr. Gilliam,

Below are the last set of samples I collected on 12/07/11. I received the results via email on 12/13/11, but was working on another project and did not view them until Monday, December 19, 2011. The level of Zinc in the effluent is above the monthly average set in the Pretreatment standard. I will perform resampling starting today and will resample tomorrow as well to provide more information. I will forward the results of these samples to you as I receive them. I will resample until I am able to show compliance. Please let me know anything else I need to do to satisfy your department.

*Kevin Campbell  
Compliance Manager  
EZ Loader Custom Boat Trailers, Inc.  
800-553-7855 ext. 259  
870-404-4629 cellular*

870-481-5150 fax  
[kcampbell@ezloader.com](mailto:kcampbell@ezloader.com)

-----Original Message-----

**From:** Sydney James [\[mailto:sjames@arkansasanalytical.com\]](mailto:sjames@arkansasanalytical.com)  
**Sent:** Tuesday, December 13, 2011 1:45 PM  
**To:** Kevin Campbell  
**Subject:** [NEWSENDER] - WW Results (12/7/11)

Thanks,  
Sydney James Randles



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