

From: [Jamie Belcourt \(adpce.ad\)](mailto:Jamie.Belcourt@adpce.ad)
To: "Greg Jackson"; Jeff Haynes
Cc: [Stacie Wassell \(adpce.ad\)](mailto:Stacie.Wassell@adpce.ad); [Richard Healey \(adpce.ad\)](mailto:Richard.Healey@adpce.ad); [David Ramsey \(adpce.ad\)](mailto:David.Ramsey@adpce.ad)
Subject: EZ Loader Boat Trailers, Inc. - ARP001055 (Mountain Home - AR0021211) - Noncompliance
Date: Wednesday, January 18, 2023 7:27:52 AM
Attachments: [image003.png](#)
[image003.png](#)

Hello,

EZ Loader Boat Trailers, Inc.'s ("EZ Loader") (Pretreatment ID ARP001055) semiannual pretreatment reports for January 1, 2020, through December 31, 2022, were electronically received, reviewed, and deemed complete with the reporting requirements in 40 C.F.R. § 403.12(e).

However, it was noted within the reports that EZ Loader is not in compliance with the Metal Finishing Pretreatment standards in 40 C.F.R. § 433.17. Specifically, the sampling analytical results for the facility's effluent provided by you on December 12, 2022, and January 3, 2023, for the aforementioned semiannual pretreatment reports show that the sampling results for zinc were exceeded on three (3) occasions. The dates of these analyses, the results of these analyses, maximum for any 1 day, and monthly average not to be exceeded are listed in the table below.

Sample Date	Result (mg/l)	Maximum for any 1 day (mg/l)	Monthly average shall not exceed (mg/l)
12/12/2022	5.29	2.61	1.48
9/19/2022	6.83	2.61	1.48
1/27/2021	3.80	2.61	1.48

In response to the findings above, DEQ requests that EZ Loader complete the following:

- Re-sample immediately as required by 40 C.F.R. § 403.12(g)(2) and provide DEQ with the results of such analysis,
- Evaluate the facility's processes to determine the source of zinc in the process water,
- Explain the cause of zinc exceedances,
- Identify and implement BMPs or process controls to reduce the quantity and/or concentration of zinc that is entering the process water stream,
- Sample following implementation of BMP's to demonstrate the effectiveness of the BMP's or process controls,
- Submit a report detailing the evaluation of processes at the facility, identification of the source of zinc, BMPs or process controls implemented to reduce or eliminate zinc in the process wastewater, and
- Submit a corrective action plan that details how the facility will attain full compliance with Pretreatment Standards.

Please submit this information within 10 days to Pretreatment-Submittals@adeq.state.ar.us.

If you have any questions or concerns, please do not hesitate to reach out to me at (501) 682-0858 or email jamie.belcourt@adeq.state.ar.us.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator
**Division of Environmental Quality | Office of Water Quality
Policy and Administration**

5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

From: [Greg Jackson](#)
To: [Jamie Belcourt \(adpce.ad\)](mailto:Jamie.Belcourt@adpce.ad)
Cc: [Jeff Haynes](#)
Subject: water samples
Date: Monday, December 12, 2022 11:05:15 AM
Attachments: [1905234 -- WW \(MAY2019\).pdf](#)
[1912070 -- WW \(DEC2019\).pdf](#)
[EZ Loader WW Analysis \(2021\).pdf](#)
[EZ Loader WW Analysis \(MAY2020\).pdf](#)
[EZ Loader WW Anaysis \(SEP22\).pdf](#)

Ma'am:

Please find attached the supporting waste water (WW) analysis for our WW Reporting for calendar years 2019, 2020, 2021, and the first half of 2022. The attached data represents all the available data for these reporting periods, and is therefore the best available data. During calendar years 2020 and 2021 our facility experienced changes to our corporate environmental compliance structure, heavy personnel turnover, and a high rate of out-sick absences and other COVID 19 lockdown interruptions all of which impacted our normal compliance activities including our routine wastewater sampling. Our facility continues to work to improve our compliance systems and is in full compliance with our WW monitoring. We are standing by as needed to provide any additional information.

Environmental / Safety
Greg Jackson
870-481-5138 ext; 4253
gjackson@ezloader.com



8100 National Dr. - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

23 May 2019

Linda Tuhacek
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651

Project: Wastewater Samples

Project Number: May 2019

SDG Number: 1905234

Enclosed are the results of analyses for samples received by the laboratory on 16-May-19 07:40. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

<u>Custody Seals</u>	✓
<u>Containers Correct</u>	✓
<u>COC/Labels Agree</u>	✓
<u>Received On Ice</u>	✓
Temperature on Receipt	2.0°C

Sincerely,

A handwritten signature in blue ink that reads "Norma James / Teresa Coins".

Norma James and/or Teresa Coins
Technical Director and/or QA Officer

This document is intended only for the use of the person(s) to whom it is expressly addressed. This document may contain information that is confidential and legally privileged. If you are not the intended recipient, you are notified that any disclosure, distribution, or copying of this document is strictly prohibited. If you have received this document in error, please destroy.

23 May 2019



Linda Tuhacek
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples
Project Number: May 2019
Date Received: 16-May-19 07:40

ANALYTICAL RESULTS

Lab Number: 1905234-01
Sample Name: Supply
Date/Time Collected: 5/15/19 13:45
Sample Matrix: Water

Table with 7 columns: Total Metals, Units, Result, Qualifier(s), Date/Time Analyzed, Batch, Method. Rows include Cadmium, Chromium, Copper, Lead, Nickel, Silver, Zinc, and Wet Chemistry Cyanide (total).

ANALYTICAL RESULTS

Lab Number: 1905234-02
Sample Name: Effluent
Date/Time Collected: 5/15/19 14:00
Sample Matrix: Water

Table with 7 columns: Total Metals, Units, Result, Qualifier(s), Date/Time Analyzed, Batch, Method. Rows include Cadmium, Chromium, Copper, Lead, Nickel, Silver, Zinc, and Wet Chemistry Cyanide (total).

23 May 2019



Linda Tuhacek
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples
Project Number: May 2019
Date Received: 16-May-19 07:40

QUALITY CONTROL RESULTS

Wet Chemistry -- Batch: B905311 (Water)

Prepared: 17-May-19 09:58 By: EP -- Analyzed: 17-May-19 09:58 By: EP

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Row 1: Cyanide (total), <0.010 mg/L, 127% / 126%, 109% / NA, , 0.791%,

Total Metals -- Batch: B905345 (Water)

Prepared: 20-May-19 08:12 By: SP -- Analyzed: 20-May-19 13:14 By: SP

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Rows: Cadmium, Chromium, Copper, Lead, Nickel, Silver, Zinc.

All Analysis performed according to EPA approved methodology when available :
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.
Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Handwritten signature: Norma James / Teresa Coins

Reviewed by:
Norma James and/or Teresa Coins
Technical Director and/or QA Officer



8100 National Dr.
 Little Rock, AR 72209
 PHONE: 501-455-3233
 FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION		Project Description		Turnaround Time		Preservation Codes:	
EZ Loader Boat Trailers, Inc. - Midway Division		Wastewater Samples		1 Day (100%)		1. Cool, 6 Degrees Centigrade	
6533 Hwy. 126 N		Reporting Information		2 Day (50%)		2. Sulfuric Acid (H ₂ SO ₄), pH < 2	
Midway, AR 72651		Telephone: 870-481-5136		3 Day (25%)		3. Nitric Acid (HNO ₃), pH < 2	
Attn: Kevin Campbell		Fax: 870-481-5150		5 Day (Routine)		4. Thiosulfate for Dechlorination	
Email: kecampbell@ezloader.com		Preservative Code: 1,6		Bottle Type: P		5. Hydrochloric Acid(HCl)	
		Bottle Type: P		TEST PARAMETERS		6. Sodium Hydroxide (NaOH), pH > 12	
Sampler(s) Signature: <i>Greg Jackson</i>		Sampler(s) Printed: Greg Jackson		Cyanide		Arkansas Analytical Work Order Number: 1905234	
Field Number		SAMPLE COLLECTION		Grab		Cd, Cr, Cu, Pb, Ni, Ag, N	
Dates		Times		Number of Bottles		Sample Matrix	
5/15/19		1:45 PM		2		Water Supply	
5/15/19		2:00 PM		2		Water Effluent	
1. Relinquished by: (Signature) <i>WPS</i>		Date/Time 5/15/19 2:15 PM		2. Received by: (Signature) <i>WPS</i>		SAMPLE CONDITION UPON RECEIPT IN LAB	
3. Relinquished by: (Signature) <i>WPS</i>		Date/Time 5/15/19 2:15 PM		4. Received by lab: (Signature) <i>Jmanda Johnson</i>		1. CUSTODY SEALS: Yes ___ No ___	
		5/16/19 0740				2. CONTAINERS CORRECT: Yes ___ No ___	
						3. COC/LABELS AGREE: Yes ___ No ___	
						4. RECEIVED ON ICE: Yes ___ No ___	
						5. TEMPERATURE ON RECEIPT: 2 °C	
						6. TEMPERATURE GUN ID: HHT# 2	
						FOR COMPLETION BY LAB ONLY	
						REMARKS / SAMPLE COMMENTS	



8100 National Dr. - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

12 December 2019

Linda Tuhacek
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651

Project: Wastewater Samples
Project Number: December 2019
SDG Number: 1912070

Enclosed are the results of analyses for samples received by the laboratory on 05-Dec-19 09:55. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

<u>Custody Seals</u>	✓
<u>Containers Correct</u>	✓
<u>COC/Labels Agree</u>	✓
<u>Received On Ice</u>	✓
Temperature on Receipt	5.0°C

Sincerely,

A handwritten signature in blue ink that reads "Norma James / Teresa Coins".

Norma James and/or Teresa Coins
Technical Director and/or QA Officer

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Linda Tuhacek
 EZ Loader Boat Trailers, Inc. - Midway Division
 6533 Hwy. 126 North
 Midway, AR 72651
 Project: Wastewater Samples
 Project Number: December 2019
 Date Received: 05-Dec-19 09:55

ANALYTICAL RESULTS

Lab Number: 1912070-01
 Sample Name: Supply
 Date/Time Collected: 12/4/19 13:50
 Sample Matrix: Water

Total Metals	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cadmium	mg/L	< 0.00120		12/9/19 16:02	B912114	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	< 0.0125		12/9/19 16:02	B912114	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	0.388		12/9/19 16:02	B912114	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0156		12/9/19 16:02	B912114	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	< 0.0104		12/9/19 16:02	B912114	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0208		12/9/19 16:02	B912114	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	< 0.0156		12/9/19 16:02	B912114	EPA 200.7, Rev 4.4 (1994)
Wet Chemistry	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cyanide (total)	mg/L	< 0.010		12/10/19 13:19	B912132	SM 4500-CN B,E-2011

ANALYTICAL RESULTS

Lab Number: 1912070-02
 Sample Name: Effluent
 Date/Time Collected: 12/4/19 13:45
 Sample Matrix: Water

Total Metals	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cadmium	mg/L	< 0.00120		12/9/19 16:06	B912114	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	0.0755		12/9/19 16:06	B912114	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	0.173		12/9/19 16:06	B912114	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0156		12/9/19 16:06	B912114	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	0.0466		12/9/19 16:06	B912114	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0208		12/9/19 16:06	B912114	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	0.377		12/9/19 16:06	B912114	EPA 200.7, Rev 4.4 (1994)
Wet Chemistry	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cyanide (total)	mg/L	< 0.010		12/10/19 13:19	B912132	SM 4500-CN B,E-2011



Linda Tuhacek
 EZ Loader Boat Trailers, Inc. - Midway Division
 6533 Hwy. 126 North
 Midway, AR 72651
 Project: Wastewater Samples
 Project Number: December 2019
 Date Received: 05-Dec-19 09:55

QUALITY CONTROL RESULTS

Total Metals -- Batch: B912114 (Water)

Prepared: 09-Dec-19 08:55 By: SP -- Analyzed: 09-Dec-19 15:35 By: SP

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Cadmium	<0.00120 mg/L	103% / NA	103% / 100%		2.45%	
Chromium	<0.0125 mg/L	104% / NA	106% / 101%		2.41%	
Copper	<0.00520 mg/L	99.9% / NA	95.2% / 92.5%		2.77%	
Lead	<0.0156 mg/L	102% / NA	94.9% / 92.9%		2.08%	
Nickel	<0.0104 mg/L	101% / NA	98.1% / 95.3%		2.86%	
Silver	<0.0208 mg/L	105% / NA	97.1% / 94.5%		2.65%	
Zinc	<0.0156 mg/L	96.1% / NA	97.5% / 94.4%		2.67%	

Wet Chemistry -- Batch: B912132 (Water)

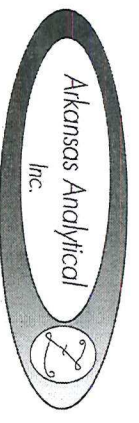
Prepared: 10-Dec-19 13:19 By: SPS -- Analyzed: 10-Dec-19 13:19 By: SPS

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Cyanide (total)	<0.010 mg/L	103% / NA	97.0% / 96.0%		1.04%	

All Analysis performed according to EPA approved methodology when available :
 SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.
 Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Norma James / Teresa Coins

Reviewed by: _____
 Norma James and/or Teresa Coins
 Technical Director and/or QA Officer



8100 National Dr.
 Little Rock, AR 72209
 PHONE: 501-455-3233
 FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION		Project Description		Turnaround Time		Preservation Codes:					
EZ Loader Boat Trailers, Inc. - Midway Division		Wastewater Samples		1 Day (100%)		1. Cool, 6 Degrees Centigrade					
6533 Hwy. 126 N				2 Day (50%)		2. Sulfuric Acid (H ₂ SO ₄), pH < 2					
Midway, AR 72651		Reporting Information		3 Day (25%)		3. Nitric Acid (HNO ₃), pH < 2					
Attn: Linda Tuhacek		Telephone: 870-481-5138		5 Day (routine)		4. Thiosulfate for Dechlorination					
		Fax: 870-481-5150		Preservative Code:		5. Hydrochloric Acid(HCl)					
		Email: Ltuhacek@ezloader.com		Bottle Types:		6. Sodium Hydroxide (NaOH), pH > 12					
				1,6 P		TEST PARAMETERS					
				1,3 P		Bottle Type Code					
						G - Glass; P - Plastic					
						V = Septum; A = Amber					
Sampler(s) Signature: <i>Linda Tuhacek</i>		Sampler(s) Printed: <i>Greg E. Jackson</i>				Arkansas Analytical Work Order Number: <i>191207D</i>					
Field Number	SAMPLE COLLECTION Dates	Time/s	Grab	Comp	Number of Bottles	Sample Matrix	IDENTIFICATION/ DESCRIPTION		SAMPLE		REMARKS / SAMPLE COMMENTS
	12-4-19	1:50 PM	X		2	Water	Cyanide	Cd, Cr, Cu, Pb, Ni, Ag, Zn			01
	12-4-19	1:45 PM	X		2	Water Effluent					02
1. Relinquished by: (Signature) <i>Linda Tuhacek</i> Date/Time 12-4-19 1:55											
2. Received by: (Signature) _____											
3. Relinquished by: (Signature) <i>Linda Tuhacek</i> Date/Time 12-4-19 1:55											
4. Received by lab: (Signature) <i>Dorothy Riddle</i> 12-5-19 9:55											
SAMPLE CONDITION UPON RECEIPT IN LAB						REMARKS / SAMPLE COMMENTS					
1. CUSTODY SEALS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No											
2. CONTAINERS CORRECT: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No											
3. COC/LABELS AGREE: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No											
4. RECEIVED ON ICE: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No											
5. TEMPERATURE ON RECEIPT: 5 °C											
6. TEMPERATURE GUN ID: HHT# 2											
FOR COMPLETION BY LAB ONLY											

VIA - UPS



8100 National Dr. - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

20 May 2020

Linda Tuhacek
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651

Project: Wastewater Samples

Project Number: May 2020

SDG Number: 2005184

Enclosed are the results of analyses for samples received by the laboratory on 13-May-20 09:45. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

<u>Custody Seals</u>	✓
<u>Containers Correct</u>	✓
<u>COC/Labels Agree</u>	✓
<u>Received On Ice</u>	✓
Temperature on Receipt	2.0°C

Sincerely,

A handwritten signature in blue ink that reads "Norma James / Teresa Coins".

Norma James and/or Teresa Coins
Technical Director and/or QA Officer

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20 May 2020



Linda Tuhacek
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples
Project Number: May 2020
Date Received: 13-May-20 09:45

ANALYTICAL RESULTS

Lab Number: 2005184-01
Sample Name: Supply
Date/Time Collected: 5/12/20 2:00
Sample Matrix: Water

Table with 7 columns: Total Metals, Units, Result, Qualifier(s), Date/Time Analyzed, Batch, Method. Rows include Cadmium, Chromium, Copper, Lead, Nickel, Silver, Zinc, and Wet Chemistry Cyanide (total).

ANALYTICAL RESULTS

Lab Number: 2005184-02
Sample Name: Effluent
Date/Time Collected: 5/12/20 2:10
Sample Matrix: Water

Table with 7 columns: Total Metals, Units, Result, Qualifier(s), Date/Time Analyzed, Batch, Method. Rows include Cadmium, Chromium, Copper, Lead, Nickel, Silver, Zinc, and Wet Chemistry Cyanide (total).

20 May 2020



Linda Tuhacek
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples
Project Number: May 2020
Date Received: 13-May-20 09:45

QUALITY CONTROL RESULTS

Total Metals -- Batch: B005244 (Water)

Prepared: 15-May-20 08:05 By: SP -- Analyzed: 15-May-20 13:32 By: SP

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Rows include Cadmium, Chromium, Copper, Lead, Nickel, Silver, and Zinc.

Wet Chemistry -- Batch: B005275 (Water)

Prepared: 18-May-20 09:57 By: AA -- Analyzed: 18-May-20 09:57 By: AA

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Row includes Cyanide (total).

All Analysis performed according to EPA approved methodology when available :
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.
Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Handwritten signature: Norma James / Teresa Coins

Reviewed by:
Norma James and/or Teresa Coins
Technical Director and/or QA Officer



8100 National Dr.
 Little Rock, AR 72209
 PHONE: 501-455-3233
 FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION		Project Description		Turnaround Time		Preservation Codes:					
EZ Loader Boat Trailers, Inc. - Midway Division		Wastewater Samples		1 Day (100%)		1. Cool, 6 Degrees Centigrade					
6533 Hwy. 126 N		Reporting Information		2 Day (50%)		2. Sulfuric Acid (H ₂ SO ₄), pH < 2					
Midway, AR 72651		Telephone: 870-481-5138		3 Day (25%)		3. Nitric Acid (HNO ₃), pH < 2					
Attn: Linda Tuhacek		Fax: 870-481-5150		5 Day (hourline)		4. Thiosulfate for Dechlorination					
Email: LTuhacek@ezloader.com		Preservative Code: 1,6		Bottle Type: P		5. Hydrochloric Acid(HCl)					
		Bottle Type: P		TEST PARAMETERS		6. Sodium Hydroxide (NaOH), pH > 12					
Sampler(s) Signature: <i>Linda Tuhacek</i>		Sampler(s) Printed: Greg E. Jackson		SAMPLE IDENTIFICATION/ DESCRIPTION		Arkansas Analytical Work Order Number: 2005184-					
Field Number	SAMPLE COLLECTION Dates	Time/s	Grab	Comp	Number of Bottles	Sample Matrix	Cyanide		Cd, Cr, Cu, Pb, Ni, Ag, Zn		
	5-12-20	2:00	X		2	Water	X	X			01
	5-12-20	2:10	X		2	Water Effluent	X	X			02
1. Relinquished by: (Signature) <i>[Signature]</i>		Date/Time 5-12-20 2:35 PM		2. Received by: (Signature) MRS		SAMPLE CONDITION UPON RECEIPT IN LAB					
3. Relinquished by: (Signature) MRS		Date/Time 5-13-2020, 0945		4. Received by lab: (Signature) Sydney James		1. CUSTODY SEALS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		2. CONTAINERS CORRECT: <input type="checkbox"/> Yes <input type="checkbox"/> No		3. COC/LABELS AGREE: <input type="checkbox"/> Yes <input type="checkbox"/> No	
						4. RECEIVED ON ICE: <input type="checkbox"/> Yes <input type="checkbox"/> No		5. TEMPERATURE ON RECEIPT: 2 °C		6. TEMPERATURE GUN ID: HHT# 2	
						FOR COMPLETION BY LAB ONLY		REMARKS / SAMPLE COMMENTS			

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 433

Use of this form is not an ADEQ requirement, but satisfies the reporting requirements in 40 CFR 403.12(e).

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION and NPDES Pretreatment Tracking # ARP00 1055

<p>A. LEGAL NAME & MAILING ADDRESS</p> <p>EZ Loader Boat Trailers, Inc. P.O. Box 270 Midway, AR 72651</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p>EZ Loader Boat Trailer, Inc 6533 Hwy 126 North Midway, AR 72651</p>
<p>C. FACILITY CONTACT: <u>Greg Jackson</u> TELEPHONE NUMBER: <u>870-481-5138 ext: 4153</u> e-mail:<u>gjackson@ezloader.com</u></p>	

(2) REPORTING PERIOD--FISCAL YEAR 2020 From 1JAN to 30JUN (Both Semi-Annual Reports must cover Fiscal Year)

<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p>June & December</p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p>FROM: January TO: June</p>
---	--

(3) DESCRIPTION OF OPERATION

<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Electroplating <input type="checkbox"/> Electroless Plating <input type="checkbox"/> Anodizing <input checked="" type="checkbox"/> Coating (conversion) <input type="checkbox"/> Chemical Etching and Milling <input type="checkbox"/> Printed Circuit Board Manufacture</p> <p><u>ANCILLARY PROCESS(ES)*</u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p><u>Cleaning, Grinding, Shearing, Welding</u></p> <p><u>Sandblasting, Painting, and Assembly</u></p> <p>_____</p> <p>_____</p>	<p>B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.</p> <p>No significant changes to regulated processes.</p>
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*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

<p>C. Number of Regular Employees at this Facility <u>115</u></p>	<p>D. [Reserved]</p>
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(4) FLOW MEASUREMENT

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge*
Regulated (Core & Anc)			6000 gal / month 24,282 gal / year
Regulated (Cyanide)			
'403.6(e) Unregulated*			
'403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW			

*If batch discharged please list the period of time of each batch discharge (300 gallons/day; 500 gallons/week, 2,000 gallons/3 months, etc). Do not normalize over that period for the average flow.

**"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

- Neutralization
- Chemical Precipitation and Sedimentation
- Chromium Reduction
- Cyanide Destruction
- Other _____
- None

B. COMMENTS ON TREATMENT SYSTEM

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES-- CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

40 CFR 433.17 Pollutant(mg/l) limits	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*
Max for 1 day	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Monthly Avg	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	<0.00125	0.0125	0.604	<0.0156	0.0104	<0.0208	0.0568	<0.010	*
Avg Measured**	<0.00125	0.0125	0.604	<0.0156	0.0104	<0.0208	0.0568	<0.010	*

Sample Location Storage Tank Area

Sample Type (Grab* or Composite) _____ Grab Sample X

*If Grab, list # of grabs over what period of time<

Number of Samples and Frequency Collected One Grab sample collect in May of 2020

40CFR136 Preservation and Analytical Methods Use: Yes No (include complete Chain of Custody)

*If a TOMP has been submitted and approved by ADEQ place N/A.

**A value here is the average of all samples taken during one (1) calendar month regardless of number of samples taken. If only one (1) sample is taken it must meet the monthly average limitation.

(6) CERTIFICATION (ONLY IF A TOMP HAS BEEN SUBMITTED/APPROVED BY ADEQ)

B. CHECK ONE: '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED '433.12(a) TTO CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last semi-annual compliance report. I further certify that this facility is implementing the toxic organic management plan submitted to Arkansas Department of Environmental Quality.

CONRAD M WEST
(Typed/Printed Name)

Conrad M West
(Corporate Officer or authorized representative signature)

Date of Signature 11/29/2022

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]

'6602 [42 U.S.C. 13101] Findings and Policy para (b) Policy.--The Congress hereby declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.

The User may list any new or ongoing Pollution Prevention practices including Best or Environmental Management Practices, Source Reduction, Waste Minimization, Lean Manufacturing, Water and/or Energy Conservaton:

- 1. Toxic Organic Plan**
- 2. Spill Prevention Practices – SPCC in place.**
- 3. Storm Water Pollution Prevention Plan – Reviewed and updated as required.**
- 4. Process Controls**
- 5. Lean Manufacturing/ Waste Minimization**
- 6: Best Management Practices – Review of treatment chemicals is ongoing to find more effective solutions.**
- 7: Watts BBH-150 filter housing with 50 micron pleated cartridge filter**

(8) GENERAL COMMENTS

(9) SEMI-ANNUAL/PERIODIC REPORT CERTIFICATION STATEMENT REQUIRED UNDER 40 CFR 403.12(I)

I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

CONDAD M WEST

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

GENERAL MANAGER

OFFICIAL TITLE

Condad M West

SIGNATURE

11/29/2022

DATE SIGNED

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 433

Use of this form is not an ADEQ requirement, but satisfies the reporting requirements in 40 CFR 403.12(e).

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION and NPDES Pretreatment Tracking # ARP00 1055

<p>A. LEGAL NAME & MAILING ADDRESS</p> <p>EZ Loader Boat Trailers, Inc. P.O. Box 270 Midway, AR 72651</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p>EZ Loader Boat Trailer, Inc 6533 Hwy 126 North Midway, AR 72651</p>
--	---

C. FACILITY CONTACT: Greg Jackson **TELEPHONE NUMBER:** 870-481-5138 ext: 4153 **e-mail:** gjackson@ezloader.com

(2) REPORTING PERIOD--FISCAL YEAR 2020 From 1JUL to 31DEC (Both Semi-Annual Reports must cover Fiscal Year)

<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p>June & December</p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p style="text-align: center;">FROM: July TO: December</p>
--	---

(3) DESCRIPTION OF OPERATION

<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Electroplating <input type="checkbox"/> Electroless Plating <input type="checkbox"/> Anodizing <input checked="" type="checkbox"/> Coating (conversion) <input type="checkbox"/> Chemical Etching and Milling <input type="checkbox"/> Printed Circuit Board Manufacture</p> <p><u>ANCILLARY PROCESS(ES)*</u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p><u>Cleaning, Grinding, Shearing, Welding</u></p> <p><u>Sandblasting, Painting, and Assembly</u></p> <p>_____</p> <p>_____</p> <p><small>*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS</small></p>	<p>B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.</p> <p style="text-align: center; padding-top: 20px;">No significant changes to regulated processes.</p>
--	--

<p>C. Number of Regular Employees at this Facility <u>115</u></p>	<p>D. [Reserved]</p>
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(4) FLOW MEASUREMENT

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge*
Regulated (Core & Anc)			6000 gal / month 24,282.64 gal/ year
Regulated (Cyanide)			
'403.6(e) Unregulated*			
'403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW			

*If batch discharged please list the period of time of each batch discharge (300 gallons/day; 500 gallons/week, 2,000 gallons/3 months, etc). Do not normalize over that period for the average flow.
 "Unregulated" has a precise legal meaning; see 40CFR403.6(e).

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

- Neutralization
- Chemical Precipitation and Sedimentation
- Chromium Reduction
- Cyanide Destruction
- Other _____
- None

B. COMMENTS ON TREATMENT SYSTEM

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES-- CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

40 CFR 433.17 Pollutant(mg/l) limits	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*
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Monthly Avg	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	<0.00125	0.0125	0.604	<0.0156	0.0104	<0.0208	0.0568	<0.010	*
Avg Measured**	<0.00125	0.0125	0.604	<0.0156	0.0104	<0.0208	0.0568	<0.010	*

Sample Location Storage Tank Area

Sample Type (Grab* or Composite) _____ Grab Sample

*If Grab, list # of grabs over what period of time<

Number of Samples and Frequency Collected One Grab sample collect in May of 2020 (see Section 8. Comments below)

40CFR136 Preservation and Analytical Methods Use: Yes No (include complete Chain of Custody)

*If a TOMP has been submitted and approved by ADEQ place N/A.

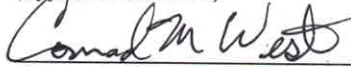
**A value here is the average of all samples taken during one (1) calendar month regardless of number of samples taken. If only one (1) sample is taken it must meet the monthly average limitation.

(6) CERTIFICATION (ONLY IF A TOMP HAS BEEN SUBMITTED/APPROVED BY ADEQ)

B. CHECK ONE: '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED '433.12(a) TTO CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last semi-annual compliance report. I further certify that this facility is implementing the toxic organic management plan submitted to Arkansas Department of Environmental Quality.

CONRAD M. WEST
(Typed/Printed Name)



(Corporate Officer or authorized representative signature)

Date of Signature 11/29/2002

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]

'6602 [42 U.S.C. 13101] Findings and Policy para (b) Policy.—The Congress hereby declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.

The User may list any new or ongoing Pollution Prevention practices including Best or Environmental Management Practices, Source Reduction, Waste Minimization, Lean Manufacturing, Water and/or Energy Conservation:

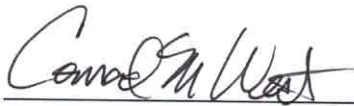
1. Toxic Organic Plan
2. Spill Prevention Practices – SPCC in place.
3. Storm Water Pollution Prevention Plan – Reviewed and updated as required.
4. Process Controls
5. Lean Manufacturing/ Waste Minimization
- 6: Best Management Practices – Review of treatment chemicals is ongoing to find more effective solutions.
- 7: Watts BBH-150 filter housing with 50 micron pleated cartridge filter

(8) GENERAL COMMENTS

Note that the for this report period no analytical data was available, therefore, the best available analytical data was used which is represented by the analytical data from May 2020. Going forward it is the intent of this facility to conduct waste water sampling twice per year, during each reporting period to remediate this situation.

(9) SEMI-ANNUAL/PERIODIC REPORT CERTIFICATION STATEMENT REQUIRED UNDER 40 CFR 403.12(I)

I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

GENERAL MANAGER

OFFICIAL TITLE

11/29/2022

DATE SIGNED



8100 National Dr. - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

04 February 2021

Linda Tuhacek
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651

Project: Wastewater Samples
Project Number: January 2021
SDG Number: 2101514

Enclosed are the results of analyses for samples received by the laboratory on 28-Jan-21 09:53. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

<u>Custody Seals</u>	✓
<u>Containers Correct</u>	✓
<u>COC/Labels Agree</u>	✓
<u>Received On Ice</u>	✓
Temperature on Receipt	4.0°C

Sincerely,

A handwritten signature in blue ink that reads "Norma James / Teresa Coins".

Norma James and/or Teresa Coins
Technical Director and/or QA Officer

This document is intended only for the use of the person(s) to whom it is expressly addressed. This document may contain information that is confidential and legally privileged. If you are not the intended recipient, you are notified that any disclosure, distribution, or copying of this document is strictly prohibited. If you have received this document in error, please destroy.

Linda Tuhacek
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples
Project Number: January 2021
Date Received: 28-Jan-21 09:53

ANALYTICAL RESULTS

Lab Number: 2101514-01
Sample Name: Supply
Date/Time Collected: 1/27/21 14:10
Sample Matrix: Water

Total Metals	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cadmium	mg/L	< 0.00120		2/2/21 13:12	B102034	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	< 0.0120		2/2/21 13:12	B102034	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	0.165		2/2/21 13:12	B102034	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0150		2/2/21 13:12	B102034	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	< 0.0100		2/2/21 13:12	B102034	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0200		2/2/21 13:12	B102034	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	0.0385		2/2/21 13:12	B102034	EPA 200.7, Rev 4.4 (1994)
Wet Chemistry	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cyanide (total)	mg/L	< 0.010		2/2/21 8:21	B102035	SM 4500-CN B,E-2011

ANALYTICAL RESULTS

Lab Number: 2101514-02
Sample Name: Effluent
Date/Time Collected: 1/27/21 14:00
Sample Matrix: Water

Total Metals	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cadmium	mg/L	< 0.00120		2/2/21 13:13	B102034	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	0.123		2/2/21 13:13	B102034	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	1.02		2/2/21 13:13	B102034	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0150		2/2/21 13:13	B102034	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	0.0430		2/2/21 13:13	B102034	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0200		2/2/21 13:13	B102034	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	3.80		2/2/21 13:13	B102034	EPA 200.7, Rev 4.4 (1994)
Wet Chemistry	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cyanide (total)	mg/L	< 0.010		2/2/21 8:21	B102035	SM 4500-CN B,E-2011

04 February 2021



Linda Tuhacek
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples
Project Number: January 2021
Date Received: 28-Jan-21 09:53

QUALITY CONTROL RESULTS

Total Metals -- Batch: B102034 (Water)

Prepared: 02-Feb-21 08:05 By: SPS -- Analyzed: 02-Feb-21 13:40 By: ST

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Rows include Cadmium, Chromium, Copper, Lead, Nickel, Silver, and Zinc.

Wet Chemistry -- Batch: B102035 (Water)

Prepared: 02-Feb-21 08:21 By: JH -- Analyzed: 02-Feb-21 08:21 By: JH

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Row includes Cyanide (total).

All Analysis performed according to EPA approved methodology when available :
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.
Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Handwritten signature: Norma James / Teresa Coins

Reviewed by:
Norma James and/or Teresa Coins
Technical Director and/or QA Officer



8100 National Dr.
 Little Rock, AR 72209
 PHONE: 501-455-3233
 FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION		Project Description		Turnaround Time		Preservation Codes:					
EZ Loader Boat Trailers, Inc. - Midway Division 6533 Hwy. 126 N Midway, AR 72651		Wastewater Samples		1 Day (100%) 2 Day (50%) 3 Day (25%)		1. Cool, 6 Degrees Centigrade 2. Sulfuric Acid (H ₂ SO ₄), pH < 2 3. Nitric Acid (HNO ₃), pH < 2 4. Thiosulfate for Dechlorination 5. Hydrochloric Acid(HCl) 6. Sodium Hydroxide (NaOH), pH > 12					
Attn: Linda Tuhacek		Reporting Information		5 Day (Routine)		TEST PARAMETERS					
Telephone: 870-481-5138 Fax: 870-481-5150 Email: L.Tuhacek@ezloader.com		Bottle Type:		Preservative Code:		Bottle Type Code					
		P		1,6		G = Glass, P = Plastic V = Septum, A = Amber					
		P		1,3							
Sampler(s) Signature: <i>Greg E Jackson</i>		Sampler(s) Printed: Greg E Jackson		Cyanide		Arkansas Analytical Work Order Number: 210514					
				Cd, Cr, Cu, Pb, Ni, Ag, Zn		01 02					
Field Number	SAMPLE COLLECTION Dates	Times	Grab	Comp	Number of Bottles	Sample Matrix	IDENTIFICATION/ DESCRIPTION		SAMPLE		REMARKS / SAMPLE COMMENTS
	1-27-21	2:10 PM	X		2	Water	Supply				
	1-27-21	2:00 PM	X		2	Water	Effluent	X	X		
1. Relinquished by: (Signature) <i>UPS</i>		Date/Time 1-28-21 9:53		2. Received by: (Signature) <i>UPS</i>		3. Received by lab: (Signature) <i>Jenny Riddle</i>		1. CUSTODY SEALS: <input checked="" type="checkbox"/> Yes ___ No 2. CONTAINERS CORRECT: <input checked="" type="checkbox"/> Yes ___ No 3. COC/LABELS AGREE: <input checked="" type="checkbox"/> Yes ___ No 4. RECEIVED ON ICE: <input checked="" type="checkbox"/> Yes ___ No 5. TEMPERATURE ON RECEIPT: 4°C 6. TEMPERATURE GUN ID: HHT# 2		SAMPLE CONDITION UPON RECEIPT IN LAB FOR COMPLETION BY LAB ONLY	

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 433

Use of this form is not an ADEQ requirement, but satisfies the reporting requirements in 40 CFR 403.12(c).

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION and NPDES Pretreatment Tracking # ARP00 1055

<p>A. LEGAL NAME & MAILING ADDRESS</p> <p>EZ Loader Boat Trailers, Inc. P.O. Box 270 Midway, AR 72651</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p>EZ Loader Boat Trailer, Inc 6533 Hwy 126 North Midway, AR 72651</p>
<p>C. FACILITY CONTACT: Greg Jackson TELEPHONE NUMBER: 870-481-5138 ext: 4153 e-mail: gjackson@ezloader.com</p>	

(2) REPORTING PERIOD--FISCAL YEAR 2021 From 1JAN to 30JUN (Both Semi-Annual Reports must cover Fiscal Year)

<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p>June & December</p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p>FROM: January TO: June</p>
--	---

(3) DESCRIPTION OF OPERATION

<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Electroplating <input type="checkbox"/> Electroless Plating <input type="checkbox"/> Anodizing <input checked="" type="checkbox"/> Coating (conversion) <input type="checkbox"/> Chemical Etching and Milling <input type="checkbox"/> Printed Circuit Board Manufacture</p> <p><u>ANCILLARY PROCESS(ES)*</u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p><u>Cleaning, Grinding, Shearing, Welding</u></p> <p><u>Sandblasting, Painting, and Assembly</u></p> <p>_____</p> <p>_____</p>	<p>B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.</p> <p>No significant changes to regulated processes.</p>
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*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

<p>C. Number of Regular Employees at this Facility <u>115</u></p>	<p>D. [Reserved]</p>
--	-----------------------------

(4) FLOW MEASUREMENT

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge*
Regulated (Core & Anc)			6000 gal / month 29,145 gal / year
Regulated (Cyanide)			
'403.6(e) Unregulated*			
'403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW			

*If batch discharged please list the period of time of each batch discharge (300 gallons/day; 500 gallons/week, 2,000 gallons/3 months, etc). Do not normalize over that period for the average flow.
**"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

B. COMMENTS ON TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

- Neutralization
- Chemical Precipitation and Sedimentation
- Chromium Reduction
- Cyanide Destruction
- Other _____
- None

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES--CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

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Max Measured	<0.00120	0.123	1.02	<0.0150	0.0430	<0.0200	3.80	<0.010	*
Avg Measured**	<0.00120	0.123	1.02	<0.0150	0.0430	<0.0200	3.80	<0.010	*

Sample Location Storage Tank Area

Sample Type (Grab* or Composite) _____ Grab Sample

*If Grab, list # of grabs over what period of time<

Number of Samples and Frequency Collected One Grab sample collect in JAN of 2021

40CFR136 Preservation and Analytical Methods Use: Yes No (include complete Chain of Custody)

*If a TOMP has been submitted and approved by ADEQ place N/A.

**A value here is the average of all samples taken during one (1) calendar month regardless of number of samples taken. If only one (1) sample is taken it must meet the monthly average limitation.

(6) CERTIFICATION (ONLY IF A TOMP HAS BEEN SUBMITTED/APPROVED BY ADEQ)

B. CHECK ONE: '433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED '433.12(a) TTO CERTIFICATION

Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last semi-annual compliance report. I further certify that this facility is implementing the toxic organic management plan submitted to Arkansas Department of Environmental Quality.

CONRAD M WEST
(Typed/Printed Name)

Conrad M West
(Corporate Officer or authorized representative signature)

Date of Signature 11/29/2022

(7) POLLUTION PREVENTION ACT OF 1990 [42 U.S.C. 13101 et seq.]

'6602 [42 U.S.C. 13101] Findings and Policy para (b) Policy.—The Congress hereby declares it to be the national policy of the United States that pollution should be prevented or reduced at the source whenever feasible; pollution that cannot be prevented should be recycled in an environmentally safe manner, whenever feasible; pollution that cannot be prevented or recycled should be treated in an environmentally safe manner whenever feasible; and disposal or other release into the environment should be employed only as a last resort and should be conducted in an environmentally safe manner.

The User may list any new or ongoing Pollution Prevention practices including Best or Environmental Management Practices, Source Reduction, Waste Minimization, Lean Manufacturing, Water and/or Energy Conservaton:

1. Toxic Organic Plan
2. Spill Prevention Practices – SPCC in place.
3. Storm Water Pollution Prevention Plan – Reviewed and updated as required.
4. Process Controls
5. Lean Manufacturing/ Waste Minimization
- 6: Best Management Practices – Review of treatment chemicals is ongoing to find more effective solutions.
- 7: Watts BBH-150 filter housing with 50 micron pleated cartridge filter

(8) GENERAL COMMENTS

Zn noted above benchmark values. Facility is presently seeking assistance from vendors to replace treatment chemicals to bring Zn content in discharge below established benchmarks.

(9) SEMI-ANNUAL/PERIODIC REPORT CERTIFICATION STATEMENT REQUIRED UNDER 40 CFR 403.12(I)

I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

CONRAD M WEST
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

GENERAL MANAGER
OFFICIAL TITLE

Conrad M West
SIGNATURE

11/29/2022
DATE SIGNED

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40 CFR 433

Use of this form is not an ADEQ requirement, but satisfies the reporting requirements in 40 CFR 403.12(e).

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION and NPDES Pretreatment Tracking # ARP00 1055

<p>A. LEGAL NAME & MAILING ADDRESS</p> <p>EZ Loader Boat Trailers, Inc. P.O. Box 270 Midway, AR 72651</p>	<p>B. FACILITY & LOCATION ADDRESS</p> <p>EZ Loader Boat Trailer, Inc 6533 Hwy 126 North Midway, AR 72651</p>
--	---

C. FACILITY CONTACT: Greg Jackson **TELEPHONE NUMBER:** 870-481-5138 ext: 4153 **e-mail:** gjackson@ezloader.com

(2) REPORTING PERIOD--FISCAL YEAR 2021 From 1JUL to 31DEC (Both Semi-Annual Reports must cover Fiscal Year)

<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p>June & December</p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p>FROM: July TO: December</p>
--	---

(3) DESCRIPTION OF OPERATION

<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Electroplating <input type="checkbox"/> Electroless Plating <input type="checkbox"/> Anodizing <input checked="" type="checkbox"/> Coating (conversion) <input type="checkbox"/> Chemical Etching and Milling <input type="checkbox"/> Printed Circuit Board Manufacture</p> <p><u>ANCILLARY PROCESS(ES)*</u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p><u>Cleaning, Grinding, Shearing, Welding</u></p> <p><u>Sandblasting, Painting, and Assembly</u></p> <p>_____</p> <p>_____</p>	<p>B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.</p> <p>No significant changes to regulated processes.</p>
--	---

*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

<p>C. Number of Regular Employees at this Facility <u>115</u></p>	<p>D. [Reserved]</p>
--	-----------------------------

(4) FLOW MEASUREMENT

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge*
Regulated (Core & Anc)			6000 gal / month 26478 gal / year
Regulated (Cyanide)			
'403.6(e) Unregulated*			
'403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW			

*If batch discharged please list the period of time of each batch discharge (300 gallons/day; 500 gallons/week, 2,000 gallons/3 months, etc). Do not normalize over that period for the average flow.

"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

B. COMMENTS ON TREATMENT SYSTEM

CHECK EACH APPLICABLE BLOCK

- Neutralization
- Chemical Precipitation and Sedimentation
- Chromium Reduction
- Cyanide Destruction
- Other _____
- None

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSES--CORE & ANCILLARY--(AFTER TREATMENT, IF APPLICABLE). ATTACH THE LAB ANALYSIS WHICH SHOWS A MAXIMUM; TABULATE ALL THE ANALYTICAL DATA COLLECTED DURING THE REPORT PERIOD IN THE SPACE PROVIDED BELOW. ZERO CONCENTRATIONS ARE NOT ACCEPTABLE; LIST THE DETECTION LIMIT IF CONCENTRATION WAS BELOW DETECTION LIMIT.

40 CFR 433.17 Pollutant(mg/l) limits	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO*
Max for 1 day	0.11	2.77	3.38	0.69	3.98	0.43	2.61	1.20	2.13
Monthly Avg	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	<0.00120	0.123	1.02	<0.0150	0.0430	<0.0200	3.80	<0.010	*
Avg Measured**	<0.00120	0.123	1.02	<0.0150	0.0430	<0.0200	3.80	<0.010	*

Sample Location Storage Tank Area

Sample Type (Grab* or Composite) _____ Grab Sample X

*If Grab, list # of grabs over what period of time<

Number of Samples and Frequency Collected One Grab sample collect in JAN of 2021 (see Section 8. Comments below)

40CFR136 Preservation and Analytical Methods Use: Yes No (include complete Chain of Custody)

*If a TOMP has been submitted and approved by ADEQ place N/A.

**A value here is the average of all samples taken during one (1) calendar month regardless of number of samples taken. If only one (1) sample is taken it must meet the monthly average limitation.

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CONRAD M WEST
(Typed/Printed Name)

Conrad M West
(Corporate Officer or authorized representative signature)

Date of Signature 11/29/2022

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- 1. Toxic Organic Plan**
- 2. Spill Prevention Practices – SPCC in place.**
- 3. Storm Water Pollution Prevention Plan – Reviewed and updated as required.**
- 4. Process Controls**
- 5. Lean Manufacturing/ Waste Minimization**
- 6: Best Management Practices – Review of treatment chemicals is ongoing to find more effective solutions.**
- 7: Watts BBH-150 filter housing with 50 micron pleated cartridge filter**

(8) GENERAL COMMENTS

Note that the for this report period no analytical data was available, therefore, the best available analytical data was used which is represented by the analytical data from JAN 2021. In the future waste water sampling will be conducted twice per year, during each reporting period to remediate this situation.

Zn noted above benchmark values from the JAN 2021 sampling event. Facility continues to work with treatment vendors to replace treatment chemicals to bring Zn content in discharge below established benchmarks.

(9) SEMI-ANNUAL/PERIODIC REPORT CERTIFICATION STATEMENT REQUIRED UNDER 40 CFR 403.12(I)

I certify under penalty of law that I have personally examined and am familiar with the information in this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

CONRAD M WEST

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Conrad M West

SIGNATURE

GENERAL MANAGER

OFFICIAL TITLE

11/29/2022

DATE SIGNED

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(1) IDENTIFYING INFORMATION and NPDES Pretreatment Tracking # ARP00 1055

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---	--

C. FACILITY CONTACT: Greg Jackson TELEPHONE NUMBER: 870-481-5138 ext: 4153 e-mail: gjackson@ezloader.com

(2) REPORTING PERIOD--FISCAL YEAR 2022 From 1JAN to 30JUN (Both Semi-Annual Reports must cover Fiscal Year)

<p>A. MONTHS WHICH REPORTS ARE DUE</p> <p>June & December</p>	<p>B. PERIOD COVERED BY THIS REPORT</p> <p>FROM: January TO: June</p>
---	--

(3) DESCRIPTION OF OPERATION

<p>A. REGULATED PROCESSES</p> <p><u>CORE PROCESS(ES)</u></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p><input type="checkbox"/> Electroplating <input type="checkbox"/> Electroless Plating <input type="checkbox"/> Anodizing <input checked="" type="checkbox"/> Coating (conversion) <input type="checkbox"/> Chemical Etching and Milling <input type="checkbox"/> Printed Circuit Board Manufacture</p> <p><u>ANCILLARY PROCESS(ES)*</u></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p><u>Cleaning, Grinding, Shearing, Welding</u></p> <p><u>Sandblasting, Painting, and Assembly</u></p> <p>_____</p> <p>_____</p>	<p>B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.</p> <p>No significant changes to regulated processes.</p>
--	--

*SEE 40CFR433.10(a) FOR THE 40 ANCILLARY OPERATIONS

<p>C. Number of Regular Employees at this Facility <u>115</u></p>	<p>D. [Reserved]</p>
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(4) FLOW MEASUREMENT

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge*
Regulated (Core & Anc)			6000 gal / month 29,145 gal / year
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'403.6(e) Unregulated*			
'403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW			

*If batch discharged please list the period of time of each batch discharge (300 gallons/day; 500 gallons/week, 2,000 gallons/3 months, etc). Do not normalize over that period for the average flow.
 **"Unregulated" has a precise legal meaning; see 40CFR403.6(e).

(5) MEASUREMENT OF POLLUTANTS

A. TYPE OF TREATMENT SYSTEM

B. COMMENTS ON TREATMENT SYSTEM

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- Neutralization
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- Chromium Reduction
- Cyanide Destruction
- Other _____
- None

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Sample Location Storage Tank Area

Sample Type (Grab* or Composite) _____ Grab Sample

*If Grab, list # of grabs over what period of time<

Number of Samples and Frequency Collected One Grab sample collect in JAN of 2021

40CFR136 Preservation and Analytical Methods Use: Yes No (include complete Chain of Custody)

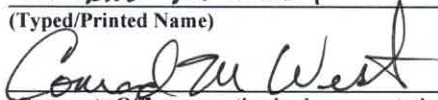
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 (Typed/Printed Name)


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CONRAD M WEST

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

Conrad M West

SIGNATURE

GENERAL MANAGER

OFFICIAL TITLE

11/29/2023

DATE SIGNED

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P.O. Box 270
Midway, AR 72651

B. FACILITY & LOCATION ADDRESS

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C. FACILITY CONTACT: Greg Jackson **TELEPHONE NUMBER:** 870-481-5138 ext: 4153 **e-mail:** gjackson@ezloader.com

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A. MONTHS WHICH REPORTS ARE DUE

June & December

B. PERIOD COVERED BY THIS REPORT

FROM: July TO: December

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

CHECK EACH APPLICABLE BLOCK

- Electroplating
- Electroless Plating
- Anodizing
- Coating (conversion)
- Chemical Etching and Milling
- Printed Circuit Board Manufacture

ANCILLARY PROCESS(ES)*

LIST BELOW EACH PROCESS USED IN THE FACILITY

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Sandblasting, Painting, and Assembly

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B. CHANGES: SUMMARIZE ANY CHANGES IN THE REGULATED PROCESSES SINCE THE LAST REPORT. ATTACH AN ADDITIONAL SHEET IF THE SPACE BELOW IS INADEQUATE. PROVIDE A NEW SCHEMATIC IF APPROPRIATE.

No significant changes to regulated processes.

C. Number of Regular Employees at this Facility 115

D. [Reserved]

(4) FLOW MEASUREMENT

INDIVIDUAL & TOTAL PROCESS FLOWS DISCHARGED TO POTW IN GALLONS PER DAY

Process	Average	Maximum	Type of Discharge*
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A. TYPE OF TREATMENT SYSTEM

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Sample Location Storage Tank Area

Sample Type (Grab* or Composite) _____ Grab Sample

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Number of Samples and Frequency Collected One Grab sample collect in DEC of 2022

40CFR136 Preservation and Analytical Methods Use: Yes No (include complete Chain of Custody)

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Conrad M. West
(Typed/Printed Name)


(Corporate Officer or authorized representative signature)

Date of Signature 12/28/2022

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Conrad M. West
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

General Manager
OFFICIAL TITLE


SIGNATURE

12/29/2022
DATE SIGNED



8100 National Dr. - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

27 September 2022

Greg Jackson
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651

Project: Wastewater Samples
Project Number: September 2022
SDG Number: 2209263

Enclosed are the results of analyses for samples received by the laboratory on 20-Sep-22 10:46. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

<u>Custody Seals</u>	✓
<u>Containers Correct</u>	✓
<u>COC/Labels Agree</u>	✓
<u>Received On Ice</u>	✓
Temperature on Receipt	4.0°C

Sincerely,

A handwritten signature in blue ink that reads "Norma James".

Norma James
Technical Director

This document is intended only for the use of the person(s) to whom it is expressly addressed. This document may contain information that is confidential and legally privileged. If you are not the intended recipient, you are notified that any disclosure, distribution, or copying of this document is strictly prohibited. If you have received this document in error, please destroy.

27 September 2022



Greg Jackson
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples
Project Number: September 2022
Date Received: 20-Sep-22 10:46

CASE NARRATIVE

Sample Delivery Group – 2209263

One OR more of the qualifiers described below may appear in this report. Qualifiers in RED apply to this SDG (Sample Delivery Group).

QUALITY CONTROL QUALIFIERS:

<u>Qualifier</u>	<u>Description</u>
E20	Sample used as "parent" for the associated analytical batch.
%D3/S-01	Surrogate failed to recover within acceptance criteria (%D3/S-01).
E1	Results associated with this surrogate were qualified as "estimated" (E1).
B	Present in the Associated Blank
B1	Present in Blank, but Not In the Sample.
%D2 / E5	Laboratory Control Spike (LCS) and/or Laboratory Control Spike Duplicate (LCSD) failed to recover with acceptance criteria (%D2). Associated results were qualified as "estimated" (E5).
%D1	Matrix Spike (MS) and/or Matrix Spike Duplicate (MSD) failed acceptance criteria.
MBA	Failed criteria due to the high concentration of analyte in the parent sample.
MBI	Failed criteria due to an interference in the parent sample.
%D3	Quality Control Surrogate failed acceptance criteria.
NREC	Quality Control Surrogate failed.

Greg Jackson
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples
Project Number: September 2022
Date Received: 20-Sep-22 10:46

ANALYTICAL RESULTS

Lab Number: 2209263-01
Sample Name: Supply
Date/Time Collected: 9/19/22 14:30
Sample Matrix: Water

<u>Total Metals</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Cadmium	mg/L	< 0.00120		9/21/22 13:21	B209308	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	< 0.0120		9/21/22 13:21	B209308	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	0.751		9/21/22 13:21	B209308	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	0.0828		9/21/22 13:21	B209308	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	0.0199		9/21/22 13:21	B209308	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0200		9/21/22 13:21	B209308	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	0.830		9/21/22 13:21	B209308	EPA 200.7, Rev 4.4 (1994)
<u>Wet Chemistry</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Cyanide (total)	mg/L	< 0.010		9/23/22 10:52	B209379	SM 4500-CN B,E-2011

ANALYTICAL RESULTS

Lab Number: 2209263-02
Sample Name: Effluent
Date/Time Collected: 9/19/22 14:45
Sample Matrix: Water

<u>Total Metals</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Cadmium	mg/L	< 0.00120		9/21/22 13:22	B209308	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	0.138		9/21/22 13:22	B209308	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	1.00		9/21/22 13:22	B209308	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0300		9/21/22 13:22	B209308	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	0.0572		9/21/22 13:22	B209308	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0200		9/21/22 13:22	B209308	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	6.83		9/21/22 13:22	B209308	EPA 200.7, Rev 4.4 (1994)
<u>Wet Chemistry</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Cyanide (total)	mg/L	< 0.010		9/23/22 10:52	B209379	SM 4500-CN B,E-2011

27 September 2022



Greg Jackson
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples
Project Number: September 2022
Date Received: 20-Sep-22 10:46

QUALITY CONTROL RESULTS

Total Metals -- Batch: B209308 (Water)

Prepared: 21-Sep-22 11:14 By: BS -- Analyzed: 21-Sep-22 15:00 By: BS

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Rows include Cadmium, Chromium, Copper, Lead, Nickel, Silver, and Zinc.

Wet Chemistry -- Batch: B209379 (Water)

Prepared: 23-Sep-22 10:52 By: JH -- Analyzed: 23-Sep-22 10:52 By: JH

Table with 7 columns: Analyte, BLK, LCS / LCSD, MS / MSD, Dup, RPD, Qualifiers. Row includes Cyanide (total).

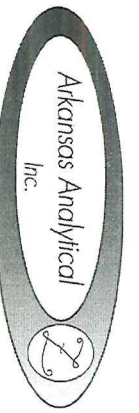
QUALIFIER(S)

*%D1: Matrix Spike and/or Matrix Spike Duplicate Percent Recovery Does Not Meet Laboratory Acceptance Criteria

All Analysis performed according to EPA approved methodology when available :
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.
Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Handwritten signature of Norma James

Reviewed by: Norma James
Technical Director



8100 National Dr.
 Little Rock, AR 72209
 PHONE: 501-455-3233
 FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION		Project Description		Turnaround Time		Preservation Codes:							
EZ Loader Boat Trailers, Inc. - Midway Division		Wastewater Samples		1 Day (100%)		1. Cool, 6 Degrees Centigrade							
6533 Hwy. 126 N				2 Day (50%)		2. Sulfuric Acid (H ₂ SO ₄), pH < 2							
Midway, AR 72651		Reporting Information		3 Day (25%)		3. Nitric Acid (HNO ₃), pH < 2							
		Telephone: 870-481-5138		5 Day (routine)		4. Thiou sulfate for Dechlorination							
		Fax: 870-481-5150		Preservative Code:		5. Hydrochloric Acid(HCl)							
Attn: Greg Jackson		Email: gjackson@ezloader.com		Bottle Type:		6. Sodium Hydroxide (NaOH), pH > 12							
				1,6		TEST PARAMETERS							
				P		Bottle Type Code							
				P		G = Glass, P = Plastic							
						V = Septum, A = Amber							
Sampler(s) Signature <i>Greg E Jackson</i>		Sampler(s) Printed Greg E Jackson				Arkansas Analytical Work Order Number: 2209263							
Field Number	SAMPLE COLLECTION Dates	Times	Grab	Comp	Number of Bottles	Sample Matrix	IDENTIFICATION/ DESCRIPTION				SAMPLE		
	9-19-02	2:30 PM	X		2	Water	Supply	Cyanide	X	X	01		
	9-19-02	2:45 PM	X		2	Water	Effluent	Cd, Cr, Cu, Pb, Ni, Ag, Zn	X	X	02		
1. Relinquished by: (Signature) <i>[Signature]</i>		Date/Time 9-19-02 2:50 PM		2. Received by: (Signature) UPS		SAMPLE CONDITION UPON RECEIPT IN LAB						REMARKS / SAMPLE COMMENTS	
3. Relinquished by: (Signature) UPS		Date/Time 9/30/02 1046		4. Received by lab: (Signature) Sydney James		1. CUSTODY SEALS: Yes ___ No <input checked="" type="checkbox"/> 2. CONTAINERS CORRECT: Yes ___ No <input checked="" type="checkbox"/> 3. COGLABELS AGREE: Yes ___ No <input checked="" type="checkbox"/> 4. RECEIVED ON ICE: Yes ___ No <input checked="" type="checkbox"/> 5. TEMPERATURE ON RECEIPT: 4 °C 6. TEMPERATURE GUN ID: HHT#5 FOR COMPLETION BY LAB ONLY							

From: [Jeff Haynes](#)
To: [Jamie Belcourt \(adpce.ad\)](#)
Cc: [Greg Jackson](#)
Subject: RE: EZ Loader Trailers - Pretreatment Reports (2020, 2021, JAN - JUN 2022)
Date: Tuesday, January 3, 2023 10:03:18 AM
Attachments: [EZ Loader Trailers Industrial WW Report \(DEC2022\).pdf](#)
[EZ Loader WW Analysis \(Batch\)\(DEC2022\).pdf](#)

Ma'am:

Please find attached the pretreatment wastewater report for EZ Loader Trailers, Inc of Midway, AR covering the JUL2022 - DEC2022 reporting period, along with supporting documentation. This report has also been relayed to the local water treatment authority (Mountain Home Water Treatment Plant). If you have any questions, or if we can provide any additional information please contact me at the contact information below, or Greg Jackson at EZ Loader trailers. Thank you.

respectfully,

Jeff Haynes
ECCI

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

From: Jamie Belcourt (adpce.ad) [<mailto:jamie.belcourt@adeq.state.ar.us>]
Sent: Tuesday, December 27, 2022 12:51 PM
To: 'JEFF & MISTY HAYNES' <jmhaynes@yelcot.net>
Cc: Greg Jackson <GJackson@ezloader.com>
Subject: RE: EZ Loader Trailers - Pretreatment Reports (2020, 2021, JAN - JUN 2022)

Yes, that should be fine.

Jamie Belcourt | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
Policy and Administration
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us

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

From: JEFF & MISTY HAYNES [<mailto:jmhaynes@yelcot.net>]
Sent: Tuesday, December 20, 2022 7:43 PM
To: Jamie Belcourt (adpce.ad)
Cc: Greg Jackson
Subject: Re: EZ Loader Trailers - Pretreatment Reports (2020, 2021, JAN - JUN 2022)

Jamie:

Got it....will get report spun-up and emailed in early JAN....will that work?

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

From: "Jamie Belcourt, adpce.ad" <jamie.belcourt@adeq.state.ar.us>
To: "JEFF & MISTY HAYNES" <jmhaynes@yelcot.net>
Cc: "Greg Jackson" <GJackson@ezloader.com>
Sent: Wednesday, December 21, 2022 12:01:10 AM
Subject: RE: EZ Loader Trailers - Pretreatment Reports (2020, 2021, JAN - JUN 2022)

Jeff,

The analysis must be for the reporting period.

Thanks,

Jamie Belcourt | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
Policy and Administration
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us

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

From: JEFF & MISTY HAYNES [<mailto:jmhaynes@yelcot.net>]
Sent: Monday, December 19, 2022 7:03 PM
To: Jamie Belcourt (adpce.ad)
Cc: Greg Jackson
Subject: Re: EZ Loader Trailers - Pretreatment Reports (2020, 2021, JAN - JUN 2022)

Jamie:

We actually pulled another sample last week....waiting analysis on that now....we were planning on using that data for the 2nd 2022 report. Pls advise if we should use the earlier analysis and go from there. Thanks much!

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

From: "Jamie Belcourt (adpce.ad)" <jamie.belcourt@adeq.state.ar.us>
To: "Jeff Haynes" <jmhaynes@yellville.net>
Cc: "Greg Jackson" <GJackson@ezloader.com>
Sent: Monday, December 19, 2022 11:34:06 PM
Subject: RE: EZ Loader Trailers - Pretreatment Reports (2020, 2021, JAN - JUN 2022)

Hello,

I am in the process of reviewing the submitted reports. There is another semiannual report due for the period of July 1, 2022 - December 31, 2022. You provided the analytical for samples taken on September 19, 2022, which would suffice for the reporting period. However, I am only lacking the report.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
Policy and Administration
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us

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

From: Jeff Haynes [<mailto:jmhaynes@yellville.net>]
Sent: Wednesday, November 30, 2022 12:47 PM
To: Pretreatment-Submittals
Cc: Jamie Belcourt (adpce.ad); 'Greg Jackson'
Subject: EZ Loader Trailers - Pretreatment Reports (2020, 2021, JAN - JUN 2022)

Ma'am/Sir:

Pls find attached the pretreatment wastewater reports for EZ Loader Trailers, Inc of Midway, AR for 2020, 2021, and the first half of 2022. The best available data (flow, analysis, etc..) was used to produce these reports following multiple complications related to COVID shutdowns, and personnel turnover. We stand ready to assist in any way needed or provide any additional information.

respectfully,

Jeff Haynes, MS, REM
ECCI

13000 Cantrell Road
Little Rock, Arkansas 72223
Office (501) 975-8100
Mobile (870) 404-2398
jhaynes@eccci.com



8100 National Dr. - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

19 December 2022

Greg Jackson
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651

Project: Wastewater Samples
Project Number: December 2022
SDG Number: 2212332

Enclosed are the results of analyses for samples received by the laboratory on 13-Dec-22 08:40. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

<u>Custody Seals</u>	✓
<u>Containers Correct</u>	✓
<u>COC/Labels Agree</u>	✓
<u>Received On Ice</u>	✓
Temperature on Receipt	2.0°C

Sincerely,

A handwritten signature in blue ink that reads "Norma James".

Norma James
Technical Director

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Greg Jackson
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples
Project Number: December 2022
Date Received: 13-Dec-22 08:40

ANALYTICAL RESULTS

Lab Number: 2212332-01
Sample Name: Supply
Date/Time Collected: 12/12/22 13:00
Sample Matrix: Water

<u>Total Metals</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Cadmium	mg/L	< 0.00125		12/14/22 14:53	B212300	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	< 0.0125		12/14/22 14:53	B212300	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	0.187		12/14/22 14:53	B212300	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0312		12/14/22 14:53	B212300	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	< 0.0104		12/14/22 14:53	B212300	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0208		12/14/22 14:53	B212300	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	0.0890		12/14/22 14:53	B212300	EPA 200.7, Rev 4.4 (1994)
<u>Wet Chemistry</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Cyanide (total)	mg/L	< 0.010		12/14/22 13:40	B212301	SM 4500-CN B,E-2011

ANALYTICAL RESULTS

Lab Number: 2212332-02
Sample Name: Effluent
Date/Time Collected: 12/12/22 13:10
Sample Matrix: Water

<u>Total Metals</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Cadmium	mg/L	< 0.00125		12/14/22 14:55	B212300	EPA 200.7, Rev 4.4 (1994)
Chromium	mg/L	0.147		12/14/22 14:55	B212300	EPA 200.7, Rev 4.4 (1994)
Copper	mg/L	1.02		12/14/22 14:55	B212300	EPA 200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0312		12/14/22 14:55	B212300	EPA 200.7, Rev 4.4 (1994)
Nickel	mg/L	0.0107		12/14/22 14:55	B212300	EPA 200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0208		12/14/22 14:55	B212300	EPA 200.7, Rev 4.4 (1994)
Zinc	mg/L	5.29		12/14/22 14:55	B212300	EPA 200.7, Rev 4.4 (1994)
<u>Wet Chemistry</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Cyanide (total)	mg/L	< 0.010		12/14/22 13:40	B212301	SM 4500-CN B,E-2011



Greg Jackson
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples
Project Number: December 2022
Date Received: 13-Dec-22 08:40

QUALITY CONTROL RESULTS

Total Metals -- Batch: B212300 (Water)

Prepared: 14-Dec-22 13:20 By: BS -- Analyzed: 14-Dec-22 15:15 By: BS

<u>Analyte</u>	<u>BLK</u>	<u>LCS / LCSD</u>	<u>MS / MSD</u>	<u>Dup</u>	<u>RPD</u>	<u>Qualifiers</u>
Cadmium	<0.00125 mg/L	100% / NA	102% / 105%		2.41%	
Chromium	<0.0125 mg/L	96.8% / NA	101% / 103%		1.64%	
Copper	<0.0208 mg/L	94.2% / NA	105% / 106%		0.812%	
Lead	<0.0312 mg/L	98.9% / NA	103% / 106%		2.92%	
Nickel	<0.0104 mg/L	96.4% / NA	100% / 103%		2.36%	
Silver	<0.0208 mg/L	97.3% / NA	102% / 102%		0.623%	
Zinc	<0.0208 mg/L	101% / NA	103% / 106%		2.73%	

Wet Chemistry -- Batch: B212301 (Water)

Prepared: 14-Dec-22 13:40 By: JB -- Analyzed: 14-Dec-22 13:40 By: JB

<u>Analyte</u>	<u>BLK</u>	<u>LCS / LCSD</u>	<u>MS / MSD</u>	<u>Dup</u>	<u>RPD</u>	<u>Qualifiers</u>
Cyanide (total)	<0.010 mg/L	115% / 110%	106% / NA		4.44%	

All Analysis performed according to EPA approved methodology when available :
 SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.
 Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

Reviewed by: _____
 Norma James
 Technical Director



8100 National Dr.
 Little Rock, AR 72209
 PHONE: 501-455-3233
 FAX: 501-455-6118

CHAIN OF CUSTODY RECORD

CLIENT INFORMATION		Project Description		Turnaround Time		Preservation Codes:					
EZ Loader Boat Trailers, Inc. - Midway Division 6533 Hwy. 126 N Midway, AR 72651		Wastewater Samples		1 Day (100%) 2 Day (50%) 3 Day (25%)		1. Cool 6 Degrees Centigrade 2. Sulfuric Acid (H ₂ SO ₄), pH < 2 3. Nitric Acid (HNO ₃), pH < 2 4. Thiosulfate for Dechlorination 5. Hydrochloric Acid (HCl) 6. Sodium Hydroxide (NaOH), pH > 12					
Attn: Greg Jackson		Telephone: 870-481-5138		5 Day (routine)		TEST PARAMETERS					
Email: gjackson@ezloader.com		Fax: 870-481-5150		Preservative Code:		1,6 P		1,3 P			
Bottle Type:				Bottle Type:		P		P			
Sampler(s) Signature: <i>Greg E Jackson</i>		Sampler(s) Printed: Greg E Jackson									
Field Number	SAMPLE COLLECTION Dates	Time/s	Grab	Comp	Number of Bottles	Sample Matrix	IDENTIFICATION/ DESCRIPTION		SAMPLE		Arkansas Analytical Work Order Number:
	12-12-22	1:00 PM	X		2	Water	Water	Supply	X	X	22122332
	12-12-22	1:10 PM	X		2	Water	Effluent		X	X	02
1. Relinquished by: (Signature)		Date/Time		2. Received by: (Signature)		SAMPLE CONDITION UPON RECEIPT IN LAB		REMARKS / SAMPLE COMMENTS			
3. Relinquished by: (Signature)		Date/Time		4. Received by lab: (Signature)		1. CUSTODY SEALS: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 2. CONTAINERS CORRECT: <input type="checkbox"/> Yes <input type="checkbox"/> No 3. COC/LABELS AGREE: <input type="checkbox"/> Yes <input type="checkbox"/> No 4. RECEIVED ON ICE: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No 5. TEMPERATURE ON RECEIPT: 2 °C 6. TEMPERATURE GUN ID: HHT# 5					
UPS		12/13/22 8:40		UPS		FOR COMPLETION BY LAB ONLY					