

Gilliam, Allen

From: Gilliam, Allen
Sent: Friday, June 12, 2009 8:52 AM
To: Gilliam, Allen; 'Kevin Campbell'
Cc: Henderson, Katie; 'mt. home alma clark'
Subject: RE: EZ Loader (ARP001055) '09 TOMP submittal & approval (Mt. Home AR0021211)

Kevin,

Based on my 11/07 compliance assurance visit and the toxic organic management plan submitted, this office concurs this is an approvable management plan for the small quantities of toxic organics you have on site.

Certification in lieu of monitoring for the toxic organics per 40 CFR 433.12(a) is hereby waived. Please continue these practices and make the requisite certification statements on future semi-annual reports.

Please keep in mind and download for your "Pretreatment File" another reporting requirement in 40 CFR 403.12(j):

"Notification of changed Discharge. All Industrial Users shall promptly notify the ADEQ (and the [City] if the [City] is not the Control Authority) in advance of any substantial change in the volume or character of pollutants in their Discharge, including the listed or characteristic hazardous wastes for which the Industrial User has submitted initial notification under paragraph (p) of this section."

Should any changes in your processes or chemicals be made, the above notification must be made. Any updates to your TOMP should be made if necessary.

Thank you for your prompt response regarding the TOMP and compliance with the National Pretreatment Regulations in 40 CFR 403.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

cc: Katie Henderson ("Pretreatment Reports"/E-Drive)
Alma Clark/Mt. Home Wastewater Treatment Plant Manager

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

From: Kevin Campbell [mailto:KCampbell@ezloader.com]
Sent: Wednesday, June 10, 2009 9:11 AM
To: Gilliam, Allen
Cc: mt. home alma clark
Subject: RE: EZ Loader TOMP draft

NPDES PERMIT FILE
NPDES # AR0021211
AFIN # 03-00070
Permit PN
Correspondence
Technical Backup
6/12/09/hjt Date Scanned

Please review and tell me if this will work.

Waiting for the data on my samples now, hope to have results soon.

Just let me know if anything needs revision or clarification.

Thanks,

Kevin Campbell
EZ Loader Custom Trailers, Inc.
(870)481-5138 ext 259



EZ Loader Custom Boat Trailers, Inc.

6533 Highway 126 North ♦ Midway, Arkansas ♦ 72651 ♦ P.O. Box 270
800-553-7855(Phone) ♦ 870-481-5146 (Fax)

June 9, 2009

TO: Mr. Allen Gilliam

State Pretreatment Coordinator

ADEQ

RE: EZ Loader (ARP001055) Toxic Organic Management Plan Submittal

Mr. Gilliam,

EZ Loader Custom Trailers in Midway, AR petitions your approval of the following document as a TOMP for the facility. Signed certification statements are found below.

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.

Gary L. Potter, Vice President & General Manager

(Corporate Officer or authorized representative)

Date of Signature June 9, 2009

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.

Gary L. Potter

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE
SIGNATURE

Vice President & General Manager
OFFICIAL TITLE

June 9, 2009
DATE SIGNED

Toxic Organic Management Plan (TOMP)

For implementing Total Toxic Organics (TTO) Pretreatment Standards

June 9, 2009



Custom Boat Trailers
6533 Highway 126 North
P.O. Box 270
Midway, AR 72651
PHONE (870) 481-5138

Summary: The EZ Loader Custom Trailer facility in Midway, Arkansas has a design and process which prohibit contamination of wastewater. There is only one open floor drain in the facility, which is in the wash booth. Effluent is pumped to tanks which hold the liquid until it is sampled to meet discharge criteria. This material will not be released to the city water treatment plant if any contamination occurs. The facility and its production processes are such that contaminants are kept away from production areas to prohibit paint defects. For example, aerosol sprays are kept in the maintenance area, while raw materials and unfinished units are stored inside. The sanitary lines from bathrooms are in a separate sewage discharge line with no open drains. Proactive planning coupled with best engineering practices effectively eliminate the likelihood of toxic organic materials reaching the waste stream.

Building design:

There is only one floor drain, which is in the wash area. Effluent is pumped to holding tanks which store the liquid until its discharge into the city lines (see photo, page 4). The sanitary lines from bathrooms are in a separate sewage discharge line.

Materials used in manufacturing, and process description:

Trailers are primarily made of steel tube, plate and channel which is cut and welded to form the trailer frame.

The steel used is clean and dry steel (no oils or coatings) since it is stored inside.



Photos of steel,
stored inside

Steel is then cut on saws which use biodegradable cooling liquid. As liquid evaporates, it is replaced. Steel shavings are disposed of with scrap steel.

Next, steel is welded to form the trailer frame. A small amount of biodegradable anti-splatter is used on the welds. This is the only spray used in the welding production area.

There are a small number of spray cans used only in the maintenance area, which is separate from production areas and away from the drain. This is done purposely to protect the trailer surfaces from anything that could damage the paint finish later in the process. It has the added benefit of prohibiting contaminants from getting released in drains.



Welded trailer frames are moved through the plant on carts



Brake fluid is the only other potential contaminate used in the weld shop. Trailer brake lines are filled with DOT 3 brake fluid. Lines are flushed to remove air, and excess fluid is captured and poured into the original container to be reused. Any small spills on the floor are cleaned up with floor dry.



Bleeding brakes



Dispensing of excess brake fluid

The trailer wash area is separate from the other production areas. (This keeps grinding dust and anything else away from the surfaces to be washed and painted.) Also, no material is stored in the wash areas except the wash chemicals.

Trailers are first sprayed with Steelprep 400, a caustic degreaser (which destroys toxic organics). Next, trailers are washed with SteelPrep 300, a phosphate acid wash. Then trailers are flushed briefly with water.

Wash liquids enter the floor drain, and are pumped to holding tanks (shown on next page).



Piping to tanks



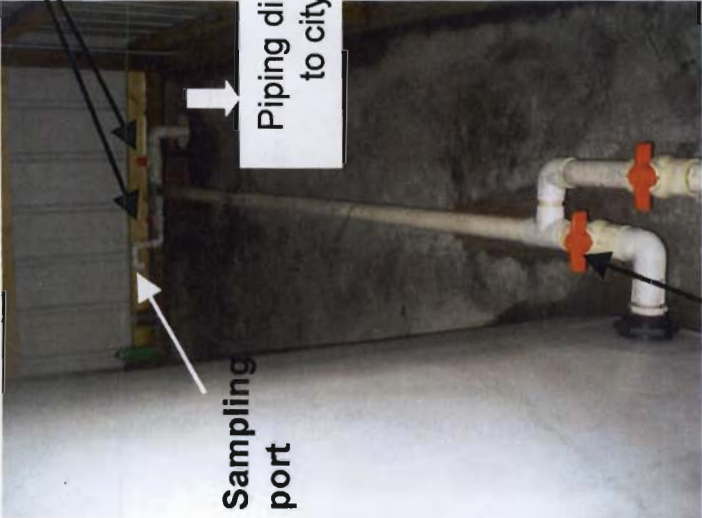
Wash booth



Sump pump



Floor drain in wash booth



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

Sampling
port

Piping discharge
to city line

*(this page is from our
operating procedure)*

3000 gallon HOLDING TANKS FOR WASH SYSTEM DISCHARGE

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

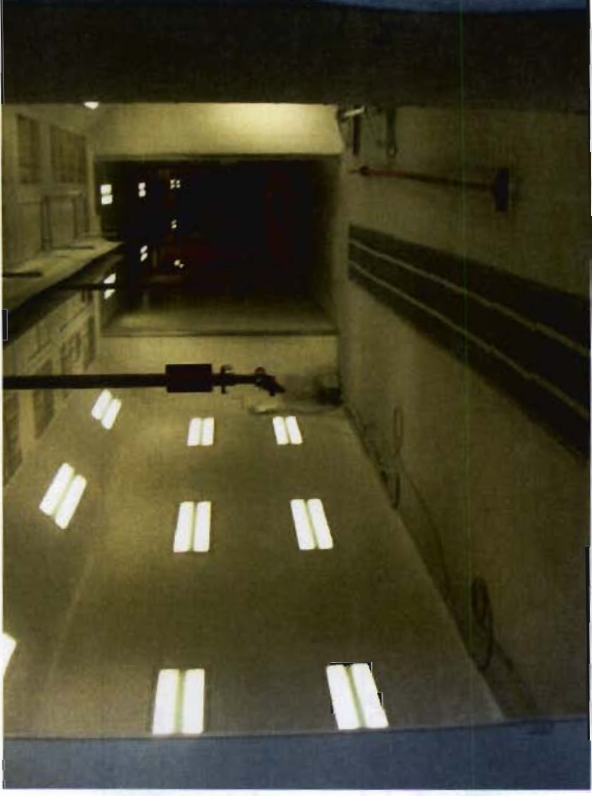
PROCESS: Cleaning water from wash booth drain is pumped to the top of a holding & treatment tank. When tank is near full, switch to the other tank. After water in full tank has been agitated, fluid is sampled and pH must be 6 - 9 before it can be drained.

Operators are not permitted to adjust pH or discharge tanks unless directed by a supervisor.

Adjustment of pH is only to be performed by Supervisor. Log sheet should be used to record time and amount of discharge. Note dissolved oxygen level as well.



After wash, trailers are dried with air and moved on carts to the paint booth



Monorail conveyor paint line (prime, paint and oven bake)



Trailer hanging on monorail, before going into prime booth



Alternate manual prime and paint booths

The monorail overhead conveyor does not have oils or lubricants (and bearings are sealed)...we do not want anything contaminating the paint. Instead, wire brushes remove any dry overspray from the chain and conveyor parts. The paint system was designed to prohibit contaminants and organics, which cause problems such as "fish eye" paint defects.



Only small quantities of solvents are used, in safety cans, and spill proof containers.

The production facility is laid out to keep the various production areas separated, and as a component of our Pollution Prevention/Spill Response Plan.



Painted trailers are assembled (completed) in the Finish Line

The largest containers in use at the facility are the 330 gallon plastic totes with protective frames which contain the wash chemicals. We receive two products in 55 gallon drums, they are acetone and lacquer thinner. Each has a 50 gallon fill in a 55 gallon container. The paint related materials are stored in a separate room which is designed for spill containment. The materials would have to flow uphill to reach the sump in the wash booth floor. All other materials are received in 5 gallon and 1 gallon or smaller containers. The 40 CFR TTO list was compared to our MSDS, and we believe there are no bulk quantities of any toxic organic on-site at this facility ever.

It is also important to note this facility does not discharge direct to drain. The drain in the wash booth is designed with a sump. A pump in the sump sends the effluent to the holding tanks. Presently the sump pump must be switched on manually to operate. If a contaminant were accidentally pumped out of the sump it would then be contained in the large holding tanks where it could be captured for proper disposal. Two stops are in place to prohibit the discharge of any out of specification effluent to the POTW.