

Wilson, Tabatha

From: Gilliam, Allen
Sent: Friday, December 27, 2013 11:44 AM
To: Kevin Campbell (KCampbell@ezloader.com)
Cc: Fuller, Kim; Wilson, Tabatha; aclark@cityofmountainhome.com
Subject: AR0021211_EZ Loader ARP001055 Dec 2013 semi-annual Pretreatment report and ADEQ reply_20131227
Attachments: Semi annual water report form December 2013.doc; Submittal letter.doc; 11-04-13 wastewater.pdf

Kevin,

EZ Loader's December 2013 semi-annual Pretreatment report was electronically received, reviewed, deemed complete and compliant with the reporting requirements in the Federal Pretreatment reporting requirements in 40 CFR 403.12(e) and more specifically, compliant with the Metal Finishing Pretreatment standards in 40 CFR 433. No further action is deemed necessary at this time.

Thank you for your timely report remaining in compliance with the Federal Pretreatment Regulations in 40 CFR 403.

As noted in your report the potable water supplied to EZ Loader is relatively high in copper. Reviewing other cities' domestic background samples, your potable water source is providing you an average of copper (mg/l) 50 times higher than what this office would estimate a State average. If, and until it might become a compliance problem for EZ Loader, contact with your provider should then be considered.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

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

E/NPDES/NPDES/Pretreatment/Reports

From: Kevin Campbell [<mailto:KCampbell@ezloader.com>]
Sent: Monday, December 23, 2013 10:56 AM
To: Gilliam, Allen
Subject: RE: EZ Loader (ARP001055) semi-annual Pretreatment report electronic submission

Mr. Gilliam,

Attached is the semi-annual Pretreatment report for EZ Loader Custom Boat Trailers, Inc (ARP001055) located in Midway, Arkansas in Baxter county. Please let me know if you have any questions or recommendations.

Thank you,

Kevin Campbell

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

40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: EZ Loader Boat Trailers, Inc.

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Cyanide)	290	3,000	Batch
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary	575	575	Continuous
Total Flow to POTW	865	3,575	*****

*"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

Pretreatment for pH adjustment has rarely been required due to the neutralizing effect of the acid and alkaline chemicals involved. pH is always monitored prior to batch release. If required, the facility can adjust using acidic/basic chemicals.

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.

Pollutant(mg/l)	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 Ave	0.07	1.71	2.07	0.43	2.38	0.24	1.48	0.65	--
Max Measured	0.00055	0.033	0.292	<0.0165	0.0598	<0.022	0.692	<0.010	--
Ave Measured	0.00055	0.033	0.292	<0.0165	0.0598	<0.022	0.692	<0.010	--

Sample Location: At discharge sampling port, as designated on schematic previously submitted to ADEQ

Sample Type (Grab or Composite): Grab sample

Number of Samples and Frequency Collected: One grab sample for all metals collected on November 04, 2013.

40CFR136 Preservation and Analytical Methods Use: Yes No

(6) CERTIFICATION

A. [Reserved]

[Reserved]

B. CHECK ONE: §433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED §433.12(a) TOMP 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.

Gary L. Potter, Vice President & General Manager
(Typed Name)



(Corporate Officer or authorized representative)
Date of Signature: December 23, 2013

CORPORATE ACKNOWLEDGEMENT (Optional)

STATE OF ARKANSAS)
COUNTY OF _____)

Before me, the undersigned authority, on this day personally appeared _____ of _____, a corporation, known to me to be the person whose name is subscribed to the foregoing instrument(s), and acknowledged to me that he executed the same for purposes and considerations therein expressed, in the capacity therein stated and as the act and deed of said corporation.

Given under my hand and seal of office on this _____ day of _____, 200__.

Notary Public in and for _____
County, Arkansas

My commission expires _____.

(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:

- Toxic Organic Management Plan
- Spill Prevention Practices
- Stormwater Pollution Prevention Plan
- Process Controls
- Best Management Practices
- Watts BBH-150 filter housing with 50 micron pleated cartridge filter

(8) GENERAL COMMENTS

The potable city water that supplies the wash equipment was sampled as well as the effluent.

Copper level in effluent on 11/04/13 was 0.292 mg/l.

Copper level in potable water on 11/04/13 was 0.471 mg/l.

The facility believes the copper level reduction in the effluent was due to the use of the Watts BBH-150 filter housing with the 50 micron pleated filter cartridge.

(9) SIGNATORY REQUIREMENTS [40CFR403.12(l)]

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

December 23, 2013



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)

December 19, 2013

To: Mr. Allen Gilliam
ADEQ State Pretreatment Coordinator

Dear Sir,

Please accept this electronic submittal as the December, 2013 semi-annual Pretreatment report for EZ Loader Custom Boat Trailers, Inc. in Midway, Arkansas.

We are glad to provide any further information your department requires.

Thank you,
Kevin Campbell



11701 I-30 Bldg 1, Ste 115 - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

07 November 2013

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

RE: Wastewater Samples
SDG Number: 1311034

Enclosed are the results of analyses for samples received by the laboratory on 05-Nov-13 07:45. 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>Preservation Confirmed</u>	✓
<u>Received On Ice</u>	✓
Temperature on Receipt	3.0°C

Sincerely,

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

Norma James
President

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Kevin Campbell
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples

Date Received: 05-Nov-13 07:45

ANALYTICAL RESULTS

Lab Number: 1311034-01
Sample Name: Supply
Date/Time Collected: 11/4/13 14:00
Sample Matrix: Water

Total Metals	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cadmium	mg/L	< 0.000550		11/6/13 15:15	A311052	200.7, Rev 4.4 (1994)
Chromium	mg/L	< 0.0110		11/6/13 15:15	A311052	200.7, Rev 4.4 (1994)
Copper	mg/L	0.471		11/6/13 15:15	A311052	200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0165		11/6/13 15:15	A311052	200.7, Rev 4.4 (1994)
Nickel	mg/L	< 0.0110		11/6/13 15:15	A311052	200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0220		11/6/13 15:15	A311052	200.7, Rev 4.4 (1994)
Zinc	mg/L	0.219		11/6/13 15:15	A311052	200.7, Rev 4.4 (1994)
Wet Chemistry	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cyanide (total)	mg/L	0.019		11/5/13 13:38	A311034	4500-CN B,E-1999

ANALYTICAL RESULTS

Lab Number: 1311034-02
Sample Name: Effluent
Date/Time Collected: 11/4/13 14:10
Sample Matrix: Water

Total Metals	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cadmium	mg/L	< 0.000550		11/6/13 15:34	A311052	200.7, Rev 4.4 (1994)
Chromium	mg/L	0.0330		11/6/13 15:34	A311052	200.7, Rev 4.4 (1994)
Copper	mg/L	0.292		11/6/13 15:34	A311052	200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0165		11/6/13 15:34	A311052	200.7, Rev 4.4 (1994)
Nickel	mg/L	0.0598		11/6/13 15:34	A311052	200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0220		11/6/13 15:34	A311052	200.7, Rev 4.4 (1994)
Zinc	mg/L	0.692		11/6/13 15:34	A311052	200.7, Rev 4.4 (1994)
Wet Chemistry	Units	Result	Qualifier(s)	Date/Time Analyzed	Batch	Method
Cyanide (total)	mg/L	< 0.010		11/5/13 13:38	A311034	4500-CN B,E-1999

07 November 2013



Kevin Campbell
EZ Loader Boat Trailers, Inc. - Midway Division
6533 Hwy. 126 North
Midway, AR 72651
Project: Wastewater Samples

Date Received: 05-Nov-13 07:45

QUALITY CONTROL RESULTS

Wet Chemistry -- Batch: A311034 (Water)

Prepared: 05-Nov-13 07:40 By: KP -- Analyzed: 05-Nov-13 13:38 By: KP

<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	96.3% / NA	93.3% / 94.3%		1.07%	

Total Metals -- Batch: A311052 (Water)

Prepared: 06-Nov-13 10:37 By: ST -- Analyzed: 06-Nov-13 13:57 By: ST

<u>Analyte</u>	<u>BLK</u>	<u>LCS / LCSD</u>	<u>MS / MSD</u>	<u>Dup</u>	<u>RPD</u>	<u>Qualifiers</u>
Cadmium	<0.000550 mg/L	89.5% / NA	88.2% / 86.9%		1.42%	
Chromium	<0.0110 mg/L	95.0% / NA	92.9% / 91.7%		1.35%	
Copper	<0.00550 mg/L	94.0% / NA	93.5% / 92.4%		1.21%	
Lead	<0.0165 mg/L	93.7% / NA	90.4% / 89.3%		1.25%	
Nickel	<0.0110 mg/L	95.0% / NA	91.6% / 90.8%		0.915%	
Silver	<0.0220 mg/L	87.2% / NA	84.3% / 83.2%		1.41%	
Zinc	<0.00550 mg/L	89.8% / NA	88.4% / 87.4%		1.05%	

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.

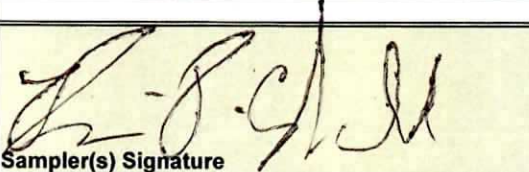
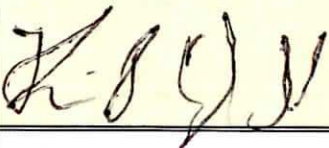
A handwritten signature in blue ink that reads "Norma James".

Reviewed by: _____
Norma James
President



11701 Interstate 30, Bldg. 1, Ste. 115
 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			24 Hour		1. Cool, 4 Degrees Centigrade				4. Thiosulfate for Dechlorination						
6533 Hwy. 126 N						48 Hour		2. Sulfuric Acid (H ₂ SO ₄), pH < 2				5. Hydrochloric Acid(HCl)						
Midway, AR 72651			Reporting Information			72 Hour		3. Nitric Acid (HNO ₃), pH < 2				6. Sodium Hydroxide (NaOH), pH > 12						
Attn: Kevin Campbell			Telephone: 870-481-5138			Routine (5 Day)		TEST PARAMETERS								Bottle Type Code		
			Fax: 870-481-5150			Preservative Code:		1,6	1,3									G = Glass; P = Plastic
			Email: kcampbell@ezloader.com			Bottle Type:		P	P									V = Septum; A = Amber
 Sampler(s) Signature			KEVIN D CAMPBELL Sampler(s) Printed															
Field Number	SAMPLE COLLECTION		Grab	Comp	Number of Bottles	Sample Matrix	SAMPLE IDENTIFICATION/ DESCRIPTION		Cyanide	Cd, Cr, Cu, Pb, Ni, Ag, Zn								Arkansas Analytical Work Order Number:
	11-4-13	2:00 pm	X		2	Water	Supply	X	X									1311034
	11-4-13	2:10 pm	X		2	Water	Effluent	X	X									01
																		02
1. Relinquished by: (Signature)			Date/Time		2. Received by: (Signature)			SAMPLE CONDITION UPON RECEIPT IN LAB						REMARKS / SAMPLE COMMENTS				
			2:30 pm 11-4-13		U.P.S.			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. PRESERVATION CONFIRMED: <input checked="" type="checkbox"/> Yes ___ No 5. RECEIVED ON ICE: <input checked="" type="checkbox"/> Yes ___ No 6. TEMPERATURE ON RECEIPT: 3°C										
3. Relinquished by: (Signature)			Date/Time		4. Received by lab: (Signature)			FOR COMPLETION BY LAB ONLY										
UPS			11-5-13, 0745		Sydney James													