

Wilson, Tabatha

From: Gilliam, Allen
Sent: Tuesday, June 03, 2014 3:15 PM
To: Kevin Campbell (KCampbell@ezloader.com)
Cc: Fuller, Kim; Wilson, Tabatha; aclark@cityofmountainhome.com
Subject: AR0021211_EZ Loader ARP001055 June 2014 semi annual Pretreatment report with ADEQ reply_20140603
Attachments: Semi annual water report form June 2014.doc; Submittal letter.doc; 05-05-14 Wastewater.pdf

Kevin,

EZ Loader's June 2014 semi-annual Pretreatment report was received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(i) and more specifically compliant with the Metal Finishing standards in 40 CFR 433. There is no further action deemed necessary at this time.

You might want to discuss the relatively high copper levels (0.556 mg/l) in your potable water supply with your local provider. Thank you for keeping this issue alive as it may affect EZ Loader's future discharge levels to a point of "indicated" non-compliance with the Metal Finishing standards for that pollutant.

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

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Alma Clark, Mt. Home, Director, Water & Sewer Services

E/NPDES/NPDES/Pretreatment/Reports

From: Kevin Campbell [<mailto:KCampbell@ezloader.com>]
Sent: Monday, June 02, 2014 12:53 PM
To: Gilliam, Allen
Subject: EZ LOADER (ARP001055) semi annual Pretreatment report and 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

SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433

Use of this form is not an EPA/ADEQ requirement.

Attn: Water Div/NPDES Pretreatment

(1) IDENTIFYING INFORMATION

A. LEGAL NAME & MAILING ADDRESS

EZ Loader Custom Trailers, Inc.
P.O. Box 270
Midway, AR 72651

B. FACILITY & LOCATION ADDRESS

EZ Loader Custom Trailers, Inc.
6533 Highway 126 North
Midway, AR 72651

C. FACILITY CONTACT: Kevin Campbell **TELEPHONE NUMBER:** (870)481-5138 ext. 259 **e-mail:**

(2) REPORTING PERIOD--FISCAL YEAR From 01/12 to 12/12 (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

_____ JUNE _____ & _____ DECEMBER _____

B. PERIOD COVERED BY THIS REPORT

FROM: November 2013 **TO:** May 2014

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

CORE PROCESS(ES)

CHECK EACH APPLICABLE BLOCK

- Electroplating
- Electroless Plating
- Anodizing
- Coating**
- Chemical Etching and Milling
- Printed Circuit Board Manufacture

ANCILLARY PROCESS(ES)*

LIST BELOW EACH PROCESS USED IN THE FACILITY

Cleaning, Grinding, Shearing, Welding,

Sandblasting, Painting and Assembly

*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

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.

C. Number of Regular Employees at this Facility 75

D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Regulated (Cyanide)	242	3,000	Batch
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary	434	434	Continuous
Total Flow to POTW	676	3,434	*****

*"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	<0.0005	0.049	0.813	<0.0165	0.0519	<0.022	0.710	<0.010	--
Ave Measured	<0.0005	0.049	0.813	<0.0165	0.0519	<0.022	0.710	<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 May 05, 2014.

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: May 29, 2014

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 05/05/14 was 0.813 mg/l.

Copper level in potable water on 05/05/14 was 0.556 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(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.



Gary L. Potter
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

Vice President & General Manager
OFFICIAL TITLE

May 29, 2014
DATE SIGNED



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)

May 29, 2014

To: Mr. Allen Gilliam
ADEQ State Pretreatment Coordinator

Dear Sir,

Please accept this electronic submittal as the June, 2014 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

13 May 2014

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

RE: Wastewater Samples
SDG Number: 1405055

Enclosed are the results of analyses for samples received by the laboratory on 06-May-14 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	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

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13 May 2014



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

Date Received: 06-May-14 08:40

ANALYTICAL RESULTS

Lab Number: 1405055-01
Sample Name: Supply
Date/Time Collected: 5/5/14 14:00
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	< 0.000550		5/8/14 16:58	A405060	200.7, Rev 4.4 (1994)
Chromium	mg/L	< 0.0110		5/8/14 16:58	A405060	200.7, Rev 4.4 (1994)
Copper	mg/L	0.556		5/8/14 16:58	A405060	200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0165		5/8/14 16:58	A405060	200.7, Rev 4.4 (1994)
Nickel	mg/L	< 0.0110		5/8/14 16:58	A405060	200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0220		5/8/14 16:58	A405060	200.7, Rev 4.4 (1994)
Zinc	mg/L	0.126		5/8/14 16:58	A405060	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		5/8/14 14:24	A405073	4500-CN B,E-1999

ANALYTICAL RESULTS

Lab Number: 1405055-02
Sample Name: Effluent
Date/Time Collected: 5/5/14 14:11
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	< 0.000550		5/8/14 17:25	A405060	200.7, Rev 4.4 (1994)
Chromium	mg/L	0.0486		5/8/14 17:25	A405060	200.7, Rev 4.4 (1994)
Copper	mg/L	0.813		5/8/14 17:25	A405060	200.7, Rev 4.4 (1994)
Lead	mg/L	< 0.0165		5/8/14 17:25	A405060	200.7, Rev 4.4 (1994)
Nickel	mg/L	0.0519		5/8/14 17:25	A405060	200.7, Rev 4.4 (1994)
Silver	mg/L	< 0.0220		5/8/14 17:25	A405060	200.7, Rev 4.4 (1994)
Zinc	mg/L	0.710		5/8/14 17:25	A405060	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		5/8/14 14:24	A405073	4500-CN B,E-1999

13 May 2014



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

Date Received: 06-May-14 08:40

QUALITY CONTROL RESULTS

Total Metals -- Batch: A405060 (Water)

Prepared: 07-May-14 13:28 By: ST -- Analyzed: 09-May-14 09:04 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: A405073 (Water)

Prepared: 08-May-14 08:30 By: WL -- Analyzed: 08-May-14 14:24 By: WL

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.

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



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 6533 Hwy. 126 N Midway, AR 72651		Wastewater Samples		24 Hour 48 Hour 72 Hour	1. Cool, 4 Degrees Centigrade 2. Sulfuric Acid (H ₂ SO ₄), pH < 2 3. Nitric Acid (HNO ₃), pH < 2			
Attn: Kevin Campbell		Reporting Information Telephone: 870-481-5138 Fax: 870-481-5150 Email: kcambell@ezloader.com		Routine (5 Day)	4. Thiosulfate for Dechlorination 5. Hydrochloric Acid(HCl) 6. Sodium Hydroxide (NaOH), pH > 12			
Sampler(s) Signature: <i>[Signature]</i>		Sampler(s) Printed: Kevin D. Campbell		Preservative Code: Bottle Type:	TEST PARAMETERS			
Field Number	SAMPLE COLLECTION Date/s Time/s	Grab	Number of Bottles	Sample Matrix	IDENTIFICATION/ DESCRIPTION	SAMPLE	TEST PARAMETERS	REMARKS / SAMPLE COMMENTS
	5-5-14	X	2	Water	Supply	Cyanide	1,6 P 1,3 P	01
	5-5-14	X	2	Water	Effluent	Cd, Cr, Cu, Pb, Ni, Ag, Zn		02
1. Relinquished by: (Signature) <i>[Signature]</i>		Date/Time 5-5-14 3:01 p.m.		2. Received by: (Signature) U.P.S.		SAMPLE CONDITION UPON RECEIPT IN LAB		
3. Relinquished by: (Signature) WPS		Date/Time 5/6/14, 0840		4. Received by lab: (Signature) <i>[Signature]</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. PRESERVATION CONFIRMED: <input checked="" type="checkbox"/> Yes ___ No 5. RECEIVED ON ICE: <input checked="" type="checkbox"/> Yes ___ No 6. TEMPERATURE ON RECEIPT: 40C-HHT #2		
Revision 1 12/17/10		FOR COMPLETION BY LAB ONLY						

Arkansas Analytical Work Order Number: 1405055

Bole Type Code
G = Glass; P = Plastic
V = Septum; A = Amber