

## Gilliam, Allen

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**From:** Gilliam, Allen  
**Sent:** Friday, March 23, 2012 3:22 PM  
**To:** Kevin Campbell (KCampbell@ezloader.com)  
**Cc:** 'mt. home alma clark'; Henderson, Katie  
**Subject:** AR0021211\_EZ Loader ARP001055 March Zn results in compliance ADEQ reply to EZ Loaders response\_20120323 AFIN 0300070 (HTML format)  
**Attachments:** EZ Loader CAV 1210 excerpt.doc

Kevin,

[Apologies for the first e-mail mistakes. This one will be the final]

Find my responses to your statements and questions below in **bold red**.

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

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**From:** Kevin Campbell [<mailto:KCampbell@ezloader.com>]  
**Sent:** Thursday, March 22, 2012 3:27 PM  
**To:** Gilliam, Allen  
**Subject:** RE: AR0021211\_EZ Loader ARP001055 March Zn results in compliance reply\_20120322 AFIN 0300070

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

**From:** Gilliam, Allen [<mailto:GILLIAM@adeq.state.ar.us>]  
**Sent:** Thursday, March 22, 2012 1:12 PM  
**To:** Kevin Campbell  
**Cc:** 'mt. home alma clark'; Henderson, Katie  
**Subject:** AR0021211\_EZ Loader ARP001055 March Zn results in compliance reply\_20120322 AFIN 0300070

Kevin,

Great news to hear on your Zn problem. Two (2) more representative samples for Zn as you generate enough wastewater will suffice. With your entire semi-annual report due in June, that should wrap up your indicated Zn issue if it is still below the Metal Finishing standards in 40 CFR 433. Then your reporting requirements will return to status quo.

Can you pinpoint the filter as the single factor in removing Zn to compliant levels? Or, are you thinking the change in the "wash" process chemicals also helped solve the problem? **Honestly, I feel like the change in process was more beneficial than the filter.** I say this because as we progressed with product changes, the pH level started heading back to the 6-8 range. I do feel the filter is also beneficial though. It is capturing a lot of muck and yuck, yet our pump is still able to push effluent through the filter with no problems. Worst case, the filter will make it much easier to keep the tanks clean in the future. **Any savings in time/money?**

My latest info on your phosphatizing chems only include the SteelPrep 300 & 400. Did you replace those two w/AlumaEtch (for the welded seams only) and are now using citric acid for the prep of the rest of the trailer prior to powder coat? Please e-mail this office the first page of your AlumaEtch (all internet "hits" indicate it is caustic, not acidic) and the citric acid MSDS. **We still use the SteelPrep 300 & 400 on all of our welded steel trailers, nothing has changed there. We used AlumaEtch on the welded aluminum trailers only. 90% of our production is steel trailers, 10% is aluminum. We are now treating only the welds on aluminum units with**

AlumaEtch 300. The rest of the trailer is cleaned with AlumaPrep 300. I will have the most up-to-date MSDS's on Monday, I will forward the sheet for each product to you then. **Thank you!**

[Caution regarding the citric acid: it will wreak havoc on carbon steel.]

If I'm reading you right, please provide this office a short step-by-step summary of your changed process(es) which you've already begun below per 40 CFR 403.12 (j) "Notification of changed Discharge. [EZ Boat Loader] shall promptly notify [ADEQ] in advance of any substantial change in the volume or character of pollutants in their Discharge..." If you have replaced the SteelPrep 300 & 400 with AlumaEtch and citric acid this would constitute a "...change in the character..." As explained above, we have only changed the process to clean our aluminum trailers. All other processes remain unchanged. With this new knowledge, do you view said changes as substantial, or do they yet constitute a "change in character" in your opinion? **The changes may not be viewed as substantial, but at a minimum, see attached (excerpt from the 12/14/10 compliance assurance visit - CAV). Please revise/update and submit to reflect the two (2) different processes performed on your steel and then the aluminum trailers (I've started with what little information I've received from you). The old CAV description of your processes is vague and doesn't mention citric acid, the separate ops on your aluminum trailers/weld seams w/AlumaEtch 300/AlumaPrep 300. This office does not have a comprehensive/accurate process description as required per 40 CFR 403.12(b).**

You will also need to update (please include a revised date on it) your Toxic Organic Management Plan (TOMP - submitted on 6/9/09; approved on 6/12/09 via ADEQ e-mail) to reflect the change from SteelPrep to AlumaEtch and Citric acid. **Do you feel we still need to revise our TOMP? Upon further review, submittal of a revised TOMP is not necessary. I'm assuming you've changed process chemicals, but none are toxic organics, right?**

Also as previously requested, could you please e-mail this office the information on your filter: make, model and supplier. I'd like to learn more about its internal "workings". I will forward this with the MSDS's on Monday (03/26/12).

If I've misread anything you've stated below, please advise. And good work on (hopefully) solving your Zn excursions. If I ever have another Zinc problem (or any kind of effluent problem), I will call Danny Southerland at the Enchem Corporation (580-564-7539). His knowledge is remarkable. In three days he righted the problem we had faced for three months.....just sayin'

I look forward to your response,  
Kevin Campbell

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

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

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Hello Allen,

FINALLY!! We installed the filter and changed the wash process, and my latest Zinc sample came back at 0.469. We brush the welds at the welding station, treat only the welded seams with the AlumaEtch acid which we were using on the entire trailer, and treat everything except the welds with citric acid. The first acid was turning the trailers white and chalky, and our customers weren't in love with the finish. The citric acid leaves the milled finish on the aluminum, and the trailers have a much more attractive look. I will continue to sample as my tank fills until I can show consistent compliant levels.

What else do I need to do, please?

Thank you,  
Kevin