

Gilliam, Allen

To: Kevin Campbell
Cc: mt. home alma clark; Henderson, Katie
Subject: AR0021211_EZ Loader ARP001055 March Zn results in compliance reply_20120322

Kevin,

Great news to hear on your Zn problem/possible solution. Two (2) more representative samples for Zn as you generate enough wastewater to treat 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?

My latest info on your phosphatizing chems only include the SteelPrep 300 & 400. Did you replace those two w/AlumaEtch 185, 188, 150, 152 or ??? (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.

[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..."

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.

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".

If I've misread anything you've stated below, please advise. And good work on (hopefully) solving your Zn excursions.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

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

From: Kevin Campbell [<mailto:KCampbell@ezloader.com>]
Sent: Wednesday, March 21, 2012 1:45 PM
To: Gilliam, Allen
Subject: FW: Effluent Zn Results (3/14/12)

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

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

From: Sydney James [<mailto:sjames@arkansasanalytical.com>]

Sent: Tuesday, March 20, 2012 5:08 PM

To: Kevin Campbell

Subject: Effluent Zn Results (3/14/12)

Thanks,
Sydney James Randles



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Business Hours - Mon-Thur - 8am-5pm, Fri - 8am-4pm

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