

Henderson, Katie

From: Gilliam, Allen
Sent: Tuesday, July 24, 2012 3:04 PM
To: Henderson, Katie
Cc: Fuller, Kim; Bailey, John
Subject: AR000021211_EZ Loader ARP001055 Revised June 2012 semi-annual Pretreatment Report and Revised TOMP_20120724 AFIN 0300070
Attachments: Semi annual water report form June 2012.doc; Updated TOMP June 2012.pdf

Katie,

Would you please scan both attachments into the e drive/pret/reports under the subject line's title?

Thanx,

Allen g

From: Kevin Campbell [<mailto:KCampbell@ezloader.com>]
Sent: Monday, July 23, 2012 2:17 PM
To: Gilliam, Allen
Subject: FW: EZ Loader Revised June 2012 semi-annual Pretreatment Report / Revised TOMP

Allen,

Here is the form with revisions, let me know what you think please.

Kevin

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

From: Kevin Campbell
Sent: Tuesday, July 10, 2012 1:47 PM
To: 'GILLIAM@adeq.state.ar.us'
Subject: FW: EZ Loader June 2012 semi-annual Pretreatment Report / Revised TOMP

Allen,

Please review and let me know how this looks to you.
Our server went down last month and I have been having trouble sending things out, hope this makes it to you.

Thank you,
Kevin Campbell
EZ Loader Custom Trailers

Kevin Campbell
Compliance Manager
EZ Loader Custom Trailers, Inc.
800-553-7855 ext. 259
870-404-4629 cellular

870-481-5150 fax
kcampbell@ezloader.com

<<Semi annual water report form June 2012.doc>> <<Updated TOMP June 2012.pdf>>

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 07/10 to 06/11 (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

JUNE & DECEMBER

B. PERIOD COVERED BY THIS REPORT

FROM: December 2011 TO: May 2012

(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 70

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)	174	2,750	Batch
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary	570	570	Continuous
Total Flow to POTW	744	3,320	*****

*"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	0.00192	0.272	1.38	0.0176	0.172	<0.020	*5.81	<0.010	--
Ave Measured	0.00172	0.246	1.29	0.0163	0.169	<0.020	** See sect. 8	<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: Two grab samples for all metals collected on December 7th and 20th, 2011. Took 7 additional grab samples for zinc only from January to May 2012. *
5.81 was max measured in the month of February 2012.

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: June 29, 2012

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**
- Proactive monthly sampling schedule**

(8) GENERAL COMMENTS

The potable city water that supplies the wash equipment was sampled as well as the effluent. Copper level in effluent was 1.20 mg/l, while the Copper level in potable water was 0.610 mg/l. Samples gathered on 12-7-11 showed elevated zinc level (4.37 mg/l), notified ADEQ and started process review. Resampling on 12-20-11 confirmed zinc excursion (4.48 mg/l). The facility investigated the upset condition and developed a preliminary corrective action plan. Sampled on 01-23-12 and 02-06-12 and again had elevated zinc levels (5.00 mg/l and 5.81 mg/l). Corrective action plan was revised with each sampling. Focus remained on process, but around March 1, 2012 the facility reviewed the products and realized one chemical used in the aluminum trailer wash process had been replaced with a more concentrated product. The out of spec product was removed from process and the Watts BBH-150 filter was installed. A new chemical was introduced in the aluminum trailer washing process and samples were grabbed on 03-14-12. March sample was well below limit for zinc at 0.469 mg/l. 04-09-12 sample was even lower at 0.429 mg/l, 05-14-12 sample was 0.706 mg/l, and 05-31-12 sample was 0.511 mg/l; all below limit for zinc. In an effort to display good environmental stewardship, and to better protect our community and resources, this facility now has a self-imposed requirement to sample zinc on a monthly basis for the remainder of 2012.

(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

June 29, 2012

DATE SIGNED

Toxic Organic Management Plan (TOMP)

For implementing Total Toxic Organics (TTO) Pretreatment Standards

June 29, 2012



**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.



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.



Welded trailer frames are moved through the plant on carts



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.

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

Aluminum trailers are brushed and blown off before entering the wash area. Any galvanized components are masked off to eliminate exposure to wash process. The aluminum rails are misted with a low pressure applicator carrying AlumaPrep 300. The unit is then rinsed with hot water and pushed out to dry under a fan bank.



Piping to tanks

Wash booth



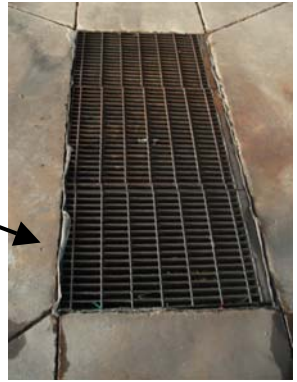
Wash chemicals with protective frame

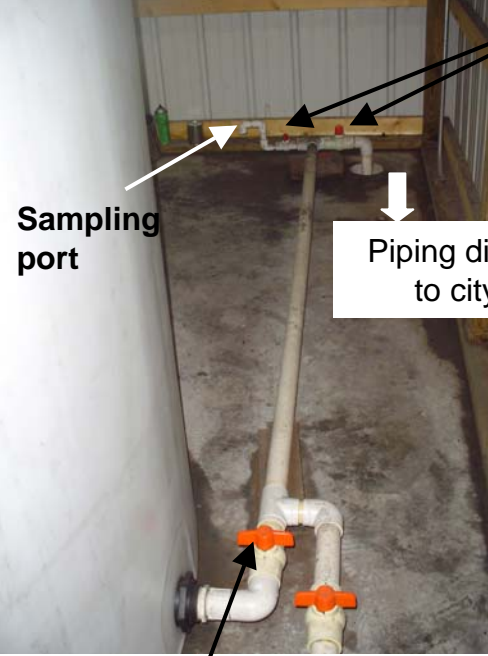
Wash liquids enter the floor drain, and are pumped to holding tanks (shown on next page).



Sump pump

Floor drain in wash booth





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

*(this page is from our
operating procedure)*

Sampling
port

Piping discharge
to city line

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.