



EZ LOADER BOAT TRAILERS, INCORPORATED
Midway, Arkansas
Industrial Wastewater Corrective Action Plan No. 2023-01 – Zinc
// FINAL REPORT //

1.0 Background

EZ Loader Custom Boat Trailers, Incorporated (EZ Loader) generates process water from its metals rinsing operations that are subject to the categorical pretreatment standards [40CFR433, et al]. Based on historical analysis (performed per 40CFR403.12) elevated levels of Zinc (Zn) were identified. In response, EZ Loader managers, in coordination with Engineering, Compliance and Construction, Incorporated (ECCI) developed and implemented a Corrective Action Plan (CAP).

2.0 Completion Date of CAP: June 5, 2023

3.0 Best Management Practices Implemented

The following Best Management Practice (BMPs) have been developed by EZ Loader managers to ensure that Zn levels are reduced to meet or exceed pretreatment standards.

i. Increase Maintenance Schedule

1. Tank Cleaning: Wastewater (WW) tanks will be taken off-line and thoroughly cleaned semi-annually.
2. Wash Bay and Sump Cleaning: The metals wash bay sump will be cleaned bi-annually.
3. Filter Upgrades and Changes: A second WW cartridge filter system has been installed, and both the new, and previously existing cartridge filters will be changed quarterly.

ii. Employee Training

1. Operator Training: EZ Loader WW maintenance and operating employees have been trained on the periodic maintenance (PM), and proper operation of the WW system.

4.0 CAP Evaluation

EZ Loader has verified the effectiveness of its WW CAP through discharge analysis. The following data relative to the previously elevated Zn discharge, indicates that the implementation of the CAP has been effective in bringing Zn discharge levels to below pretreatment standards.

i. Post New Filter/Cleaning Sampling: Following the cleaning of the wash bay, sump, and tanks, the waste water will be sampled to determine the effectiveness of these maintenance actions.

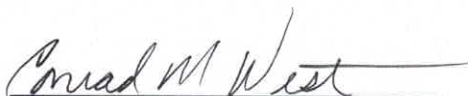
1. An initial sampling event was conducted on January 25, 2023 using an initial filter capable of capturing particles larger than 20.0 microns. The results for Zn are as follows:

- a. Supply Water Zn = <0.0208 mg/l
- b. Maximum Allowed – Daily = 2.61 mg/l
- c. Maximum Allowed – Monthly Average = 1.48 mg/l
- d. Monitored Discharge Water Zn = 0.294 mg/l

5.0 CAP Closure

Based on the information presented above indicating that EZ Loader WW CAP 2023-01 has been implemented, and has been validated as effective based on WW analysis, CAP 2023-01 is hereby closed.

EZ Loader management makes environmental stewardship a priority, and takes pride in its role as a leader in the recreational boat trailer manufacturing industry sector. We believe the actions we have taken to address our industrial discharge will reinforce our commitment to these principals. If I can help in any way further, or provide any additional information please feel free to me. Thank you for your assistance.



Mr. Conrad West
General Manager