

## Peltier, Hannah

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**From:** Gilliam, Allen  
**Sent:** Friday, February 20, 2015 11:57 AM  
**To:** groach@roachconveyors.com; sribble@roachconveyors.com  
**Cc:** Fuller, Kim; Peltier, Hannah; scottytw@centurytel.net  
**Subject:** AR0035602\_Roach ARP001060 Feb 2015 semi annual Pretreatment report with ADEQ reply\_20150220  
**Attachments:** doc05876020150220105635.pdf

Mr. Roach,

Roach Conveyors' February 2015 semi-annual Pretreatment report (attached) was received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically in compliance with the Metal Finishing standards in 40 CFR 433.17. No further action is deemed necessary at this time.

Should I remove Merritt Davis as Roach's primary contact?

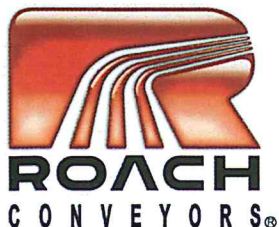
Thank you for your timely report remaining in compliance with the Federal Pretreatment Regulations in 40 CFR 403.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

cc: Scotty Jones, Trumann Water and Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports



808 HWY 463 Trumann, AR 72472 Tel 870-483-7631 Fax 870-483-7049

www.roachconveyors.com

February 4, 2015

Mr. Allen Gilliam  
Pretreatment Coordinator  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock AR 72118-5317

RECEIVED  
FEB 10 2015  
14113 KB

Ref: Semi-Annual Report

Dear Mr. Gilliam:

Enclosed please find our semi-annual report for period August 1, 2014, through January 31, 2015, which includes the lab test results from December 11, 2014.

Sincerely,

ROACH MANUFACTURING CORPORATION

A handwritten signature in black ink, appearing to read 'G. W. Roach, Jr.', written over a horizontal line.

G. W. Roach, Jr.  
President

Enclosure

GWR/st

**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**

Roach Manufacturing Corporation  
P. O. Box 1310  
Trumann, AR 72472

**B. FACILITY & LOCATION ADDRESS**

Roach Manufacturing Corporation  
808 Highway 463N  
Trumann, AR 72472

**C. FACILITY CONTACT: G. W. Roach, Jr.      TELEPHONE NUMBER: 870-483-7631      e-mail: groach@roachconveyors.com**

**(2) REPORTING PERIOD--FISCAL YEAR From Feb 1 to Jan 31      (Both Semi-Annual Reports must cover Fiscal Year)**

**A. MONTHS WHICH REPORTS ARE DUE**

February & August

**B. PERIOD COVERED BY THIS REPORT**

**FROM: August 1, 2014      TO: January 31, 2015**

**(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

      NONE        
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\*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.

NONE

**C. Number of Regular Employees at this Facility**  
      219      

**D. [Reserved]**

**(4) FLOW MEASUREMENT**

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Ancillary)	2,260	10,000	5 days per week
Regulated (Cyanide)			
'403.6(e) Unregulated*			
'403.6(e) Dilute			
Cooling Water			
Sanitary	3,580	7,160	Continuous
<b>Total Flow to POTW</b>	<b>5,840</b>	<b>13,000</b>	<b>*****</b>

\*"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

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	<0.0001	0.0055	0.0696	<0.0005	0.287	<0.0001	0.0863	<0.005	----
Ave Measured	<0.0001	0.00319	0.0235	<0.0005	0.0162	<0.0001	0.0227	<0.005	----

Sample Location          at process tanks of 4-stage washer \_\_\_\_\_

Sample Type (Grab or Composite)          composite \_\_\_\_\_

Number of Samples and Frequency Collected          two, once per report period \_\_\_\_\_

40CFR136 Preservation and Analytical Methods Use:  Yes  No



**(6) CERTIFICATION**


A. [Reserved]

[Reserved]

B. CHECK ONE: ' 433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED    X ' 433.12(a) TTO 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.

G. W. Roach, Jr.  
(Typed Name)

  
(Corporate Officer or authorized representative)

Date of Signature 2-4-15

**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:**

Roach Manufacturing Corporation is implementing the Toxic Organics Management Plan dated July 2013 and approved by ADEQ with letter dated August 6, 2013.

**(8) GENERAL COMMENTS**

**(9) SIGNATORY REQUIREMENTS [40CFR403.12(l)]**

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.

G. W. Roach, Jr.  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

President  
OFFICIAL TITLE

2-4-15  
DATE SIGNED

12/17/2014

Roach Conveyors  
Ms. Sherri Tribble  
808 Highway 463 North  
Truman, AR, 72472

Ref: Analytical Testing  
ETC Report Number: 14-345-0300  
Client Project Description: Tumann, AR

Dear Ms. Sherri Tribble:

Environmental Testing and Consulting, Inc. received sample(s) on 12/11/2014 for the analyses presented in the following report.

The above referenced project has been analyzed per your instructions. The analyses were performed in accordance with the applicable analytical method.

The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2012) and NELAC unless otherwise indicated. Any parameter for which the laboratory is not officially NELAP accredited is indicated by a '~' symbol. These are not included in the scope because NELAP accreditation is either not available or has not been applied for. Additional certifications may be held/are available for parameters, where NELAP accreditation is not required or applicable. A full list of certifications is available upon request.

Per EPA Methods Update Rule (May 2012), all methods from Standard Methods for the Examination of Water and Wastewater are reported to include the year of approval.

The results are shown on the attached Report of Analysis(s). Results for solid matrices are reported on an as-received basis unless otherwise indicated. This report shall not be reproduced except in full and relates only to the samples included in this report.

Please do not hesitate to contact me or client services if you have any questions or need additional information.

Sincerely,



Randy Thomas  
Project Manager

*Laboratory's liability in any claim relating to analyses performed shall be limited to, at laboratory's option, repeating the analysis in question at laboratory's expense, or the refund of the charges paid for performance of said analysis.*

Alabama #40750	Louisiana #04015	VA NELAP #460181	Texas #T104704180-11-6	Arkansas #88-0650
Mississippi	California #2904	NC #415	Oklahoma #9311	Virginia #00106
Kentucky #90047	Tennessee #TN02027	EPA #TN00012	Kentucky UST #41	Kansas #E-10396







# ENVIRONMENTAL TESTING & CONSULTING, INC.

2790 Whitten Road Memphis, Tennessee 38133 (901) 213-2400 Fax (901) 213-2440  
 "A Laboratory Management Partner"

07154

Roach Conveyors  
 Ms. Sherri Tribble  
 808 Highway 463 North  
 Truman, AR 72472

Project Tumann, AR  
 Information :

Report Date : 12/17/2014  
 Received : 12/11/2014

*Randall H. Thomas*

Report Number : **14-345-0300**

## REPORT OF ANALYSIS

Randy Thomas  
 Project Manager

Lab No : **91615**

Matrix: **Aqueous**

Sample ID : **Stage 4 Continuous Rinse**

Sampled: **12/11/2014 12:40**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	12/16/14 11:30	EWB	4500CNE-2011
Total Cadmium	<0.100	µg/L	0.100	1	12/15/14 19:49	RQE	EPA-200.8
Total Chromium	<b>3.19</b>	µg/L	1.00	1	12/15/14 19:49	RQE	EPA-200.8
Total Copper	<b>23.5</b>	µg/L	0.500	1	12/15/14 19:49	RQE	EPA-200.8
Total Lead	<0.500	µg/L	0.500	1	12/15/14 19:49	RQE	EPA-200.8
Total Nickel	<b>16.2</b>	µg/L	0.500	1	12/15/14 19:49	RQE	EPA-200.8
Total Silver	<0.100	µg/L	0.100	1	12/15/14 19:49	RQE	EPA-200.8
Total Zinc	<b>22.7</b>	µg/L	5.00	1	12/15/14 19:49	RQE	EPA-200.8

Qualifiers/ Definitions	*	Outside QC limit	DF	Dilution Factor
	MQL	Method Quantitation Limit		





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2790 Whitten Road      Memphis, Tennessee 38133      (901) 213-2400      Fax (901) 213-2440  
 "A Laboratory Management Partner"

07154

Roach Conveyors  
 Ms. Sherri Tribble  
 808 Highway 463 North  
 Truman, AR 72472

Project      Tumann, AR  
 Information :

Report Date : 12/17/2014  
 Received : 12/11/2014

*Randall H. Thomas*

Report Number : **14-345-0300**

## REPORT OF ANALYSIS

Randy Thomas  
 Project Manager

Lab No : **91616**  
 Sample ID : **Stages 1,2,3 & 4**

Matrix: **Aqueous**  
 Sampled: **12/11/2014 12:30**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	12/16/14 11:30	EWB	4500CNE-2011
Total Cadmium	<0.100	µg/L	0.100	1	12/15/14 19:56	RQE	EPA-200.8
Total Chromium	<b>5.50</b>	µg/L	1.00	1	12/15/14 19:56	RQE	EPA-200.8
Total Copper	<b>69.6</b>	µg/L	0.500	1	12/15/14 19:56	RQE	EPA-200.8
Total Lead	<0.500	µg/L	0.500	1	12/15/14 19:56	RQE	EPA-200.8
Total Nickel	<b>287</b>	µg/L	0.500	1	12/15/14 19:56	RQE	EPA-200.8
Total Silver	<0.100	µg/L	0.100	1	12/15/14 19:56	RQE	EPA-200.8
Total Zinc	<b>86.3</b>	µg/L	5.00	1	12/15/14 19:56	RQE	EPA-200.8

**Qualifiers/ Definitions**      \*      Outside QC limit      DF      Dilution Factor  
 MQL      Method Quantitation Limit

**Cooler Receipt Form**

Customer Number: **07154**

Customer Name: **Roach Conveyors**

Report Number: **14-345-0300**

**Shipping Method**

Fed Ex     
  US Postal     
  Lab     
  Other :   
 UPS     
  Client     
  Courier     
 Thermometer ID:

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Number of coolers received	<input style="width: 50px; border: 1px solid black;" type="text" value="1"/>		
Custody seals intact on shipping container/cooler?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
Chain of Custody (COC) present?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC agrees with sample label(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
COC properly completed	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Samples in proper containers?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sample containers intact?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Sufficient sample volume for indicated test(s)?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
All samples received within holding time?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler temperature in compliance?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Water - Sample containers properly preserved	<input checked="" type="radio"/> Yes	<input type="radio"/> No	<input type="radio"/> N/A
Water - VOA vials free of headspace	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Trip Blanks received with VOAs	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
Soil VOA method 5035 – compliance criteria met	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> N/A
<input type="checkbox"/> High concentration container (48 hr)	<input type="checkbox"/> Low concentration EnCore samplers (48 hr)		
<input type="checkbox"/> High concentration pre-weighed (methanol -14 d)	<input type="checkbox"/> Low conc pre-weighed vials (Sod Bis -14 d)		
Special precautions or instructions included?	<input type="radio"/> Yes	<input checked="" type="radio"/> No	

Comments:

Any regulatory non-compliance issues will be recorded on non-compliance report.

Signature:

Date & Time:

Environmental Testing & Consulting, Inc. Chain of Custody

Page 1 of 1



Roach Conveyors  
Tumann, AR

14-345-0300  
07154  
12-11-2014  
15:35:07

Client Name <b>Roach Mfg, Corp.</b>		Client Project Manager/Contact <b>Dr. Rick Clift Sherri Tribble</b>		Phone # <b>870-215-2676 870-483-7631</b>	
Project/ Site Location <b>Tumann, Arkansas</b>				email Address <b>rcclift@astate.edu</b>	
Project Number <b>-</b>	FID # <b>-</b>	Purchase Order Number <b>-</b>			
Type of Event <b>Single Daily Weekly Monthly Quarterly <u>Semi-Annual</u></b>			Method of Shipment <b>Personal Delivery</b>		

NPDES  
 Wastewater  
 UST  
 Other Program

RUSH - Additional charges apply.  
The following require a Statement of Work  
 Special Report Requirements  
 Special Detection Limit(s)  
 Special Method Requirements

Environmental Testing & Consulting, Inc. 2790 Whitten Road Memphis, TN 38133 (901) 213-2400 (phone) (901) 213-2440 (fax) www.etcmemphis.com			Number of Containers	Matrix	Required Analysis:																
Date:	Time:	Sample Identification:			(G)rab or (C)omposite	Metals: Cd, Cr, Cu, Pb, Ni, Ag #24	Total Cyanide														
12/11/14	12:40 P	stage 4 continuous Rinse	2	WW	C	X	X														
12/11/14	12:30 P	Stages 1, 2, 3 & 4	2	WW	C	X	X														

Matrix WW - Wastewater GW - Groundwater DW - Drinking Water S - Soil O - Oil L - Non aqueous liquid Other: _____			Sampled by (Name/Affiliation): (Print): <b>Ervin Clark - Roach Rick Clift - Consultant</b>				Client Remarks/Comments <b>-</b>			
<b>For Laboratory Use Only</b>			Relinquished by: (SIGNATURE) <i>[Signature]</i>		Date Time <b>12/11/14 1:55 P</b>		Received by: (SIGNATURE)		Date Time	
Ice			Relinquished by: (SIGNATURE)		Date Time		Received by: (SIGNATURE)		Date Time	
Cooler Temp			Relinquished by: (SIGNATURE)		Date Time		Received for lab by: (SIGNATURE)		Date Time	
Lab Comments <b>(Y) N 3.80c TH4 (MBS)</b>							<b>[Signature]</b>		<b>12-11-14 1355</b>	