

# APPLICATION FOR DETERMINATION / 40CFR403.6(a)

OR

# BASELINE MONITORING REPORT / 40CFR403.12(b)

40 CFR PART 403 - GENERAL PRETREATMENT REGULATIONS FOR EXISTING AND NEW SOURCES OF POLLUTION

HISTORICAL DATA AVAILABLE

RETURN TO: ARK DEPT OF ENVIRONMENTAL QUALITY  
 NPDES / PRETREATMENT SECTION  
 5301 NORTHSHORE DRIVE  
 NORTH LITTLE ROCK, ARKANSAS 72118-5317

Use of this form is not an EPA/ADEQ requirement.

## (1) IDENTIFYING INFORMATION

<b>A. User's Legal Name &amp; Mailing Address</b>  Roach Manufacturing Corporation PO Box 1310 Trumann AR 72472	<b>B. Facility Name &amp; Location</b>  Roach Manufacturing Corporation 808 Hwy. 463 N. Trumann AR 72472
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<b>C. Name of Owners &amp; Address</b>  G. W. Roach, Jr., President Mike Roach, Sr., Vice President Margaret Parks, Secretary - Treasurer	<b>D. Facility Contact (PROVIDE THE NAME, TITLE &amp; PHONE NO. OF A DESIGNATED PERSON TO CONTACT IF ADDITIONAL INFORMATION IS NECESSARY)</b>  G. W. Roach, Jr. President 870-483-7631 ext. 222 groach@roachconveyors.com
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**D. Name of Operators:**  
 same as owners

<b>F. Number of Employees</b> 219	<b>G. Number of Shifts/Day</b> 2	<b>H. Number of Months/Year Plant Operates:</b> 12 months
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**I. PROVIDE BELOW THE NAME OF THE PUBLICLY OWNED TREATMENT WORKS (POTW--SEWERAGE AUTHORITY, MUNICIPALITY, ETC.) THAT RECEIVES / WILL RECEIVE THE WASTEWATER DISCHARGES FROM THIS FACILITY**

Trumann Water Works

<b>J. Provide the Date the facility will begin discharging regulated wastewater to the POTW</b> immediately	<b>K. Provide the Date the suspected regulated operation was installed</b> May 2006
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## (2) PERMITS: DESCRIBE ALL ENVIRONMENTAL CONTROL PERMITS HELD BY OR FOR THE FACILITY.

DESCRIBE TITLE OF THE PERMIT	PERMIT NO.	ISSUING OFFICE	EXP. DATE
N/A			

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## (3) DESCRIPTION OF OPERATION

A. List Raw/Basis Materials used (e.g., steel, aluminum, etc):

steel, aluminum

B. List Chemicals used (Avoid using brand names/show constituents; e.g., phosphoric acid, nickel sulfate, etc):

phosphoric acid

C. Describe Manufacturing or Service Activities Conducted and the Final Products:

Manufacturer of conveyors.

D. Describe (and summarize below) all suspected Regulated Process (Attach additional sheet if necessary):

Process Description	Prod Rate <sup>i</sup>	Category <sup>ii</sup>	Subpart <sup>iii</sup>	SIC Code
metal wash down	unknown	unknown	unknown	35 35

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E. Cite evidence and reasons why particular subcategories are applicable and why others are not applicable (Attach additional sheet if necessary):

## Applicable subcategories

(1) Phosphoric acid is only used in our paint booth wash down process to clean the metal prior to painting. A 3300 gallon holding tank is used to store the phosphoric acid and water waste until dumped. This tank is dumped once every three months. The holding tank is tested weekly by the paint booth group leader to ensure a proper PH balance is maintained. He uses a PH test strip and maintains a PH of 6.5 in the tank. He tests the tank prior to dumping to make sure it is 6.5 ph. The 3300 gallon tank is a 3250 gallon water to 50 gallon chemical solution.

(2) We also have a 1300 gallon rinse tank that is dumped every two months. This water would only contain a minute amount of phosphoric acid that is not measured or tested. Water only is used as a second rinse to the metal after it goes through the phosphoric acid and water wash down process.

## Non-Applicable Subcategories

All other processes / waste.

F. Provide on a separate sheet: (1) a schematic drawing of the part flow through each suspected regulated process that generates wastewater--optional for concentration-based industries (2) a schematic drawing (blank enclosed) showing all wastewater flows (regulated? and nonregulated), location of any treatment system, sampling location(s), flows for each individual wastestream and point(s) of discharge to the POTW.

Previously submitted flow chart is all that is available. Copy is attached.

**(4) FLOW MEASUREMENT - Provide most current and accurate data**

# APPLICATION FOR DETERMINATION OR BASELINE MONITORING REPORT (CON'D)

A. Total Plant Flow in Gallons per Day (gpd):

Average: 9,365.94                      Maximum: unknown

No current breakdown of water use per process is available.

Regulated? Process	Average Flow Rate (gpd)	Maximum Flow Rate (gpd)	Type of Discharge (Cont., Batch, etc)
Unregulated <sup>IV</sup>	*****	*****	*****
Cooling Water			
Sanitary Waste			

**(5) MEASUREMENT OF POLLUTANTS - Provide analytical data on the regulated pollutants in the proposed discharge**

A. Provide here or on a separate sheet a description of any existing or proposed wastewater treatment system.

N/A - PH testing on 3300 gallon holding tank is the only test currently being performed.

B. Analysis of Regulated Flows: The industrial user must provide an analysis (historical data is acceptable) of the effluent from the proposed regulated processes. (Only those pollutants specifically regulated by the applicable category need be reported.)

N/A

Suspected Regulated Process(es): \_\_\_\_\_

Pollutant											
Maximum (mg/l)											
Average (mg/l)											

C. Provide the date of the analyses (if the data is historical, provide the time period):

N/A

# APPLICATION FOR DETERMINATION OR BASELINE MONITORING REPORT (CON'D)

General Comments:

[This area is a large, empty rectangular box intended for handwritten or typed general comments. It contains no text.]

APPLICATION FOR DETERMINATION OR BASELINE MONITORING REPORT (CON'D)

40 CFR PART 403 - GENERAL PRETREATMENT REGULATIONS FOR EXISTING AND NEW SOURCES OF POLLUTION

Excerpts from §403.5 National pretreatment standards: Prohibited discharges

(a)(1) General prohibitions. A User may not introduce into a POTW any pollutant(s) which cause Pass Through or Interference. These general prohibitions and the specific prohibitions in paragraph (b) of this section apply to each User introducing pollutants into a POTW whether or not the User is subject to other National Pretreatment Standards or any national, State, or local Pretreatment Requirements.

(b) Specific prohibitions. In addition, the following pollutants shall not be introduced into a POTW:

(1) Pollutants which create a fire or explosion hazard in the POTW, including, but not limited to, wastestreams with a closed cup flashpoint of less than 140 degrees Fahrenheit or 60 degrees Centigrade using the test methods specified in 40 CFR 261.21.

(2) Pollutants which will cause corrosive structural damage to the POTW, but in no case Discharges with pH lower than 5.0, unless the works is specifically designed to accommodate such Discharges;

(3) Solid or viscous pollutants in amounts which will cause obstruction to the flow in the POTW resulting in Interference;

(4) Any pollutant, including oxygen demanding pollutants (BOD, etc.) released in a Discharge at a flow rate and/or pollutant concentration which will cause Interference with the POTW.

(5) Heat in amounts which will inhibit biological activity in the POTW resulting in Interference, but in no case heat in such quantities that the temperature at the POTW Treatment Plant exceeds 40oC (104oF) unless the Approval Authority, upon request of the POTW, approves alternate temperature limits.

(6) Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause interference or pass through;

(7) Pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems;

(8) Any trucked or hauled pollutants, except at discharge points designated by the POTW.

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SIGNATORY REQUIREMENT

I certify under penalty of law that I have personally examined and am familiar with the information in this Application for Determination (or Baseline Monitoring Report) and all attachments, and that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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 - Authorized Representative (Corporate Executive, Plant Manager, et al) per 40CFR403.12(l)

President

Official Title



Signature

2-2-10

Date

<sup>i</sup>List the production rate (million off-lbs, million ft<sup>2</sup>, etc); applies only to industries which have production based standards. This does not apply to industries (40CFR433 Metal Finishers, et al) with concentration based limits.

<sup>ii</sup>Cite the Applicable/Appropriate Pretreatment Standard, e.g. 40CFR433

<sup>iii</sup>Cite appropriate subcategory of Pretreatment Standard; e.g., find in 40CFR467 Subpart A--Rolling With Neat Oils Subcategory

<sup>iv</sup>Unregulated processes have pollutants regulated by law but the process is not regulated.



December 16, 2009

Roach Manufacturing Corporation  
808 Highway 463 North  
Trumann , AR. 72472

RE: Letter of Authorization

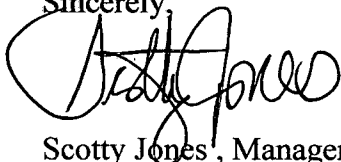
Dear Sir or Madam :

Roach Manufacturing is an industrial customer of the Trumann municipal wastewater system, and Trumann has determined it necessary to publish a Letter of Authorization allowing Roach Manufacturing to continue discharging wastewater into the Trumann wastewater collection system. A letter setting forth the conditions for acceptance of Roach Manufacturing discharge into the wastewater system has already been agreed upon October 20 , 2009. ( Letter of Understanding ).

Compliance with the Letter of Understanding does not relieve Roach Manufacturing of its obligation to comply with any or all applicable pre-treatment regulations, standards, or requirements under local, state, and federal laws, including any such regulations, standards, requirements, or laws that may become effective after the date of this letter.

Under the guidelines set forth in the Letter of Understanding, I (Scotty Jones / Manager of Trumann Wastewater ) to hereby authorize Roach Manufacturing to continue discharging wastewater into the Trumann Wastewater collection system.

Sincerely,



Scotty Jones , Manager  
Trumann Waterworks

Accepted :

By. \_\_\_\_\_

Date. \_\_\_\_\_

(please return signed original to Trumann Waterworks)

Trumann Waterworks  
106 East Main St.  
Trumann, AR. 72472



**CERTIFIED MAIL™**



**ROACH MANUFACTURING CO.**  
808 Highway 463 N  
Trumann, AR 72472-13



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MAILED FROM ZIP CODE 72472

**\$ 05.71<sup>0</sup>**



Ark. Dept. of Environmental Quality  
NPDES / Pretreatment Section  
5301 Northshore Drive  
North Little Rock AR 72118-5317