

## Wilson, Tabatha

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**From:** Gilliam, Allen  
**Sent:** Tuesday, August 19, 2014 2:13 PM  
**To:** groach@roachconveyors.com; sribble@roachconveyors.com  
**Cc:** Fuller, Kim; Wilson, Tabatha; scottytw@centurytel.net  
**Subject:** AR0035602\_Roach Conveyors ARP001060 Aug 2014 semi annual Pretreatment report with ADEQ reply\_20140819  
**Attachments:** Roach's Aug 2014 Semi annual Pretreatment Report.pdf

Mr. G.W. Roach Jr. or Ms. Tribble,

Roach Conveyors' August 2014 semi-annual report was received on 8/13/2014, reviewed, deemed complete and compliant with the Federal Pretreatment reporting requirements in 40 CFR 403.12(e) and more specifically compliant with the Metal Finishing standards located in 40 CFR 433.17. There is no further action deemed necessary at this time.

Thank you for the information regarding the cyanide preservative issue and your corrective action. It is understood this pollutant is not in use at your facility regardless.

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

Ec: Scotty Jones, Trumann Water and Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

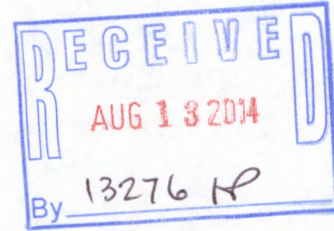
CF6MK



808 HWY 463 Trumann, AR 72472 Tel 870-483-7631 Fax 870-483-7049  
www.roachconveyors.com

August 11, 2014

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



Re: Semi-Annual Report

Dear Mr. Gilliam:

Enclosed please find our semi-annual report for period February 1, 2014 through July 31, 2014, which includes the lab test results from June 6, 2014.

At the time of sampling on June 6, 2014, it was noticed that the sample bottles from the lab for Total Cyanide had very little preservative in them. Compositing of the samples was completed around 11:30 am that morning, and the samples were taken on ice immediately to the lab in Memphis, TN. The lab checked the pH in the Total Cyanide sample bottles upon arrival, and the pH was found to be near neutral about 1.5 hours after compositing the samples. Thus, the lab was instructed to add the preservative and conduct the analysis for Total Cyanide. Evidently, the sample bottles were old and the preservative was not effective in raising the pH. In the future, we will make sure that sample containers from the lab are stored properly and that only newly prepared sample containers are used.

Sincerely,

ROACH MANUFACTURING CORPORATION

A handwritten signature in black ink, appearing to be '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: February 1, 2014      TO: July 31, 2014**

## (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

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\*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)	2,200	10,000	5 days per week
Regulated (Cyanide)			
' 403.6(e) Unregulated*			
' 403.6(e) Dilute			
Cooling Water			
Sanitary	2,920	5,840	Continuous
<b>Total Flow to POTW</b>	<b>5,120</b>	<b>15,840</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	<0.0005	0.00557	0.0609	<0.0025	0.267	<0.0005	0.0892	0.055	----
Ave Measured	<0.0005	0.00355	0.0516	<0.0005	0.206	<0.0001	0.0706	0.027	----

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 8-11-14

**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:**

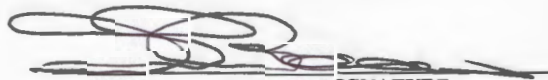
Roach Manufacturing Corporation is implementing the Toxic Organics Management Plan dated July 2013 and approved by ADEQ with letter dated August 6, 2013.

**(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

8-11-14  
DATE SIGNED

6/16/2014

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

Ref: Analytical Testing  
ETC Report Number: 14-157-0248  
Client Project Description: Truman, AR

Dear Ms. Sherri Tribble:

Environmental Testing and Consulting, Inc. received sample(s) on 6/6/2014 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



### Non-Compliance Login Summary Report

Incident Date: 06-06-2014 01:44 pm  
Report number: 14-157-0248 Lab Number(s): L94667-94668  
Customer number: 07154  
Customer Name: Roach Conveyors  
Contact Name: Roach Conveyors  
Project ID:

This Non-Compliance Report has been generated because proper EPA protocol was not followed for the above referenced sample(s). This means that the data generated from the analysis of this project may not be suitable for Regulatory compliance.

This report should be included with any data submitted to a Regulatory Agency. The actual problems encountered are listed below.

#### Description of Login Non-Compliance

<input type="checkbox"/> <b>Sample Temperature Non-compliant</b> Cooler Temperature: degrees Celsius Required Temperature: degrees Celsius
<input type="checkbox"/> <b>Sample Received in Improper Container</b> Analysis: Received Container: Required Container:
<input checked="" type="checkbox"/> <b>Sample Improperly Preserved</b> Analysis: Cyanide Received Preservative: None Required Preservative: Sodium Hydroxide
<input type="checkbox"/> <b>Sample Received Outside Holding Time</b> Date Received: 06-06-2014 00:00 Analysis: Sampled Date and Time: Required Holding Time:

Other:

#### Corrective Action

Client Notified:  Yes  No Date Client Notified: 6/6/14 Contact Name: Dr. Rick Clift

Client Directive:

Approval to preserve and analyze per Dr. Rick Clift.

Initiated By: Rebekah Ross Project manager: Randall Thomas QAO: Richard Medina





# 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 Truman, AR  
Information :

Report Date : 06/16/2014  
Received : 6/6/2014

*Randall H. Thomas*

Randy Thomas  
Project Manager

Report Number : **14-157-0248**

## REPORT OF ANALYSIS

Lab No : **94667**  
Sample ID : **Stage 4 Continuous Rinse**

Matrix: **Aqueous**  
Sampled: **6/6/2014 11:30**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Cyanide	<b>0.055</b>	mg/L	0.010	1	06/10/14 10:20	EWB	4500CNE-2011
Total Cadmium	<0.500	µg/L	0.500	5	06/13/14 14:21	RQE	EPA-200.8
Total Chromium	<b>3.55 B</b>	µg/L	1.00	1	06/11/14 15:31	RQE	EPA-200.8
Total Copper	<b>51.6</b>	µg/L	0.500	1	06/11/14 15:31	RQE	EPA-200.8
Total Lead	<0.500	µg/L	0.500	1	06/11/14 15:31	RQE	EPA-200.8
Total Nickel	<b>206</b>	µg/L	0.500	1	06/11/14 15:31	RQE	EPA-200.8
Total Silver	<0.100	µg/L	0.100	1	06/11/14 15:31	RQE	EPA-200.8
Total Zinc	<b>89.2</b>	µg/L	5.00	1	06/11/14 15:31	RQE	EPA-200.8

Qualifiers/Definitions	*	Outside QC limit	B	Analyte detected in blank
	DF	Dilution Factor	MQL	Method Quantitation Limit



# 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 Truman, AR  
Information :

Report Date : 06/16/2014  
Received : 6/6/2014

Report Number : **14-157-0248**

## REPORT OF ANALYSIS

Randy Thomas  
Project Manager

Lab No : **94668**  
Sample ID : **Stages 1,2,3,& 4**

Matrix: **Aqueous**  
Sampled: **6/6/2014 11:20**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Total Cyanide	<0.010	mg/L	0.010	1	06/10/14 10:20	EWB	4500CNE-2011
Total Cadmium	<0.500	µg/L	0.500	5	06/13/14 14:28	RQE	EPA-200.8
Total Chromium	<b>5.57</b>	µg/L	5.00	5	06/13/14 14:28	RQE	EPA-200.8
Total Copper	<b>60.9</b>	µg/L	2.50	5	06/13/14 14:28	RQE	EPA-200.8
Total Lead	<2.50	µg/L	2.50	5	06/13/14 14:28	RQE	EPA-200.8
Total Nickel	<b>267</b>	µg/L	2.50	5	06/13/14 14:28	RQE	EPA-200.8
Total Silver	<0.500	µg/L	0.500	5	06/13/14 14:28	RQE	EPA-200.8
Total Zinc	<b>51.9</b>	µg/L	25.0	5	06/13/14 14:28	RQE	EPA-200.8

### Qualifiers/ Definitions

\*  
DF

Outside QC limit  
Dilution Factor

B  
MQL

Analyte detected in blank  
Method Quantitation Limit

**Cooler Receipt Form**

Customer Number: **07154**

Customer Name: **Roach Conveyors**

Report Number: **14-157-0248**

**Shipping Method**

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

Shipping container/cooler uncompromised?       Yes       No

---

Custody seals intact on shipping container/cooler?       Yes       No       Not Required

---

Custody seals intact on sample bottles?       Yes       No       Not Required

---

Chain of Custody (COC) present?       Yes       No

---

COC agrees with sample label(s)?       Yes       No

---

COC properly completed       Yes       No

---

Samples in proper containers?       Yes       No

---

Sample containers intact?       Yes       No

---

Sufficient sample volume for indicated test(s)?       Yes       No

---

All samples received within holding time?       Yes       No

---

Cooler temperature in compliance?       Yes       No

---

Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.       Yes       No

---

Water - Sample containers properly preserved       Yes       No       N/A

---

Water - VOA vials free of headspace       Yes       No       N/A

---

Trip Blanks received with VOAs       Yes       No       N/A

---

Soil VOA method 5035 – compliance criteria met       Yes       No       N/A

---

High concentration container (48 hr)       Low concentration EnCore samplers (48 hr)

---

High concentration pre-weighed (methanol -14 d)       Low conc pre-weighed vials (Sod Bis -14 d)

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Special precautions or instructions included?       Yes       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  
Truman, AR

14-157-0248  
07154  
06-06-2014  
13:39:50

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>Trumann, Arkansas</b>				Email Address <b>rclift@astate.edu</b>	
Project Number -		FID # -		Purchase Order Number -	
Type of Event Single Daily Weekly Monthly Quarterly <u>Semi-Annual</u>				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



Date	Time	Sample Identification	Number of Containers	Matrix	(G)rab or (C)omposite	Required Analysis:														
						Metals = Cd, Cr, Zn, Cu, Pb, Ni, Ag, As	Total Cyanide													
6/6/14	11:30A	Stage 4 Continuous RMSC	2	WW	C	X	X													
6/6/14	11:30A	Stages 1, 2, 3, & 4	2	WW	C	X	X													

<b>Matrix</b> WW - Wastewater GW - Groundwater DW - Drinking Water S-Soil O-Oil L-Non aqueous liquid Other: _____		Sampled by (Name/Affiliation): (Print): <b>Erwin Clark - Roach Rick Clift - Consultant</b>		Client Remarks/Comments -	
<b>For Laboratory Use Only</b> Ice: _____ Cooler Temp: _____ Lab Comments: _____		Relinquished by: (SIGNATURE) 		Date Time: <b>6/6/14 1:08pm</b>	
Relinquished by: (SIGNATURE)		Relinquished by: (SIGNATURE)		Date Time:	
Relinquished by: (SIGNATURE)		Relinquished by: (SIGNATURE)		Date Time:	

(Y) N CIP Started

Received for lab by: (SIGNATURE) **[Signature]** 6-10-14 1308