

**From:** [Gilliam, Allen](#)  
**To:** [groach@roachconveyors.com](mailto:groach@roachconveyors.com)  
**Cc:** [Burrow, Kealey](#); [Peltier, Hannah](#); [scottytw@centurytel.net](mailto:scottytw@centurytel.net)  
**Subject:** AR0035602\_Roach Conveyors ARP001060 August 2015 semi annual Pretreatment report\_20150826  
**Date:** Wednesday, August 26, 2015 8:47:02 AM  
**Attachments:** [Roach"s August 2015 Semi-Annual Pretreatment Report.pdf](#)

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Mr. Roach,

Roach Conveyors' August 2015 semi-annual report (attached) was ~~electronically~~ received on 8/20/15, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically compliant with the Metal Finishing standards in 40 CFR 433.17. No further action is deemed necessary at this time.

Thank you for your timely report.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

cc: Scotty Jones, Trumann Water and Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

AG

BXI 27

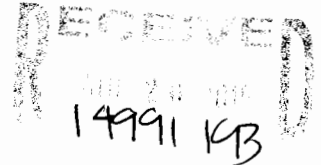


808 HWY 463 Trumann, AR 72472 Tel 870-483-7631 Fax 870-483-7049

www.roachconveyors.com

August 17, 2015

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, 2015, through July 31, 2015, which includes the lab test results from April 10, 2015.

Sincerely,

ROACH MANUFACTURING CORPORATION

A handwritten signature in black ink that reads "G.W. Roach, Jr." followed by a circled monogram "GR".

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, 2015      TO: July 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        
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

**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

\*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

**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 & Cyanide)	2,220	10,000	5 days per week
' 403.6(e) Unregulated*			
' 403.6(e) Dilute			
Cooling Water			
Sanitary	3,200	6,400	Continuous
Total Flow to POTW	5,420	16,400	*****

\*"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	0.00052	0.00265	0.0709	<0.0005	0.131	<0.0001	0.0469	0.006	----
Ave Measured	<0.0001	<0.001	0.0193	<0.0005	0.0084	<0.0001	0.0151	<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 8-14-15

**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(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.

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

  
SIGNATURE

President  
OFFICIAL TITLE

8-14-15  
DATE SIGNED



# ENVIRONMENTAL TESTING & CONSULTING, INC.

2790 Whitten Road

Memphis, Tennessee 38133

(901) 213-2400

Fax (901) 213-2440

"A Laboratory Management Partner"

4/21/2015

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

Ref: Analytical Testing  
ETC Report Number: 15-100-0259  
Client Project Description: Trumann, AR

Dear Ms. Sherri Tribble:

Environmental Testing and Consulting, Inc. received sample(s) on 4/10/2015 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





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Fax (901) 213-2440

"A Laboratory Management Partner"

07154

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

Project Trumann, AR  
Information :

Report Date : 04/21/2015  
Received : 4/10/2015

*Randell H. Thomas*

Report Number : **15-100-0259**

## REPORT OF ANALYSIS

Randy Thomas  
Project Manager

Lab No : **96314**

Matrix: **Aqueous**

Sample ID : **Stage 4 Continuous Rinse**

Sampled: **4/10/2015 12:15**

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<b>0.006</b>	mg/L	0.005	1	04/20/15 11:40	EWB	4500CNE-2011
Total Cadmium	<0.100	µg/L	0.100	1	04/20/15 16:31	CGC	EPA-200.8
Total Chromium	<1.00	µg/L	1.00	1	04/20/15 16:31	CGC	EPA-200.8
Total Copper	<b>19.3</b>	µg/L	0.500	1	04/20/15 16:31	CGC	EPA-200.8
Total Lead	<0.500	µg/L	0.500	1	04/20/15 16:31	CGC	EPA-200.8
Total Nickel	<b>8.40</b>	µg/L	0.500	1	04/20/15 16:31	CGC	EPA-200.8
Total Silver	<0.100	µg/L	0.100	1	04/20/15 16:31	CGC	EPA-200.8
Total Zinc	<b>15.1</b>	µg/L	5.00	1	04/20/15 16:31	CGC	EPA-200.8

### Qualifiers/ Definitions

\* Outside QC limit  
MQL Method Quantitation Limit

DF Dilution Factor





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07154

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

Project Trumann, AR  
Information :

Report Date : 04/21/2015  
Received : 4/10/2015

Report Number : **15-100-0259**

## REPORT OF ANALYSIS

Randy Thomas  
Project Manager

Lab No : **96315**  
Sample ID : **Stages 1,2,3 & 4**

Matrix: **Aqueous**  
Sampled: **4/10/2015 12:05**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	04/20/15 07:55	EWB	4500CNE-2011
Total Cadmium	<b>0.521</b>	µg/L	0.100	1	04/20/15 16:38	CGC	EPA-200.8
Total Chromium	<b>2.65</b>	µg/L	1.00	1	04/20/15 16:38	CGC	EPA-200.8
Total Copper	<b>70.9</b>	µg/L	0.500	1	04/20/15 16:38	CGC	EPA-200.8
Total Lead	<0.500	µg/L	0.500	1	04/20/15 16:38	CGC	EPA-200.8
Total Nickel	<b>131</b>	µg/L	0.500	1	04/20/15 16:38	CGC	EPA-200.8
Total Silver	<0.100	µg/L	0.100	1	04/20/15 16:38	CGC	EPA-200.8
Total Zinc	<b>46.9</b>	µg/L	5.00	1	04/20/15 16:38	CGC	EPA-200.8

### Qualifiers/ Definitions

\* Outside QC limit  
MQL Method Quantitation Limit

DF Dilution Factor

**Cooler Receipt Form**

Customer Number: **07154**

Customer Name: **Roach Conveyors**

Report Number: **15-100-0259**

**Shipping Method**

Fed Ex

US Postal

Lab

Other :

UPS

Client

Courier

Thermometer ID: #5

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	No	
Number of coolers received	<input type="text" value="1"/>		
Custody seals intact on shipping container/cooler?	Yes	No	<input checked="" type="radio"/> Not Required
Custody seals intact on sample bottles?	Yes	No	<input checked="" type="radio"/> Not Required
Chain of Custody (COC) present?	<input checked="" type="radio"/> Yes	No	
COC agrees with sample label(s)?	<input checked="" type="radio"/> Yes	No	
COC properly completed	<input checked="" type="radio"/> Yes	No	
Samples in proper containers?	<input checked="" type="radio"/> Yes	No	
Sample containers intact?	<input checked="" type="radio"/> Yes	No	
Sufficient sample volume for indicated test(s)?	<input checked="" type="radio"/> Yes	No	
All samples received within holding time?	<input checked="" type="radio"/> Yes	No	
Cooler temperature in compliance?	<input checked="" type="radio"/> Yes	No	
Cooler/Samples arrived at the laboratory on ice. Samples were considered acceptable as cooling process had begun.	<input checked="" type="radio"/> Yes	No	
Water - Sample containers properly preserved	<input checked="" type="radio"/> Yes	No	N/A
Water - VOA vials free of headspace	Yes	No	<input checked="" type="radio"/> N/A
Trip Blanks received with VOAs	Yes	No	<input checked="" type="radio"/> N/A
Soil VOA method 5035 – compliance criteria met	Yes	No	<input checked="" type="radio"/> 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)	
Special precautions or instructions included?	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    of   

Client Name <b>Roach Mfg. Corp.</b>		Client Project Manager/Contact <b>Dr. Rick Clifft Sherri Tribble</b>		Phone # <b>870-215-2676 870-403-7631</b>	
Project/ Site Location <b>Trumann, Arkansas</b>				Email Address <b>rclifft@astate.edu</b>	
Project Number <b>-</b>		FID # <b>-</b>		Purchase Order Number <b>-</b>	
Type of Event Single Daily Weekly Monthly Quarterly <b>Semi-Annual</b>				Method of Shipment <b>Personal Delivery</b>	



Roach Conveyors  
Trumann, AR

15-100-0259  
07154  
04-10-2015  
14:22:34

- 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	(G)rab or (C)omposite	Metals: Cd, Cr, Cu, Pb, Ni, Ag, Zn	Total Cyanide	Required Analysis:												
Date:	Time:	Sample Identification:						1	2	3	4	5	6	7	8	9	10			
4/10/15	12:15P	Stage 4 Continuous Rinse	2	WW	C	X	X													
4/10/15	12:05P	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>Erwin Clark - Roach R. GIBST - consultant</b>		Client Remarks/Comments					
For Laboratory Use Only		Relinquished by: (SIGNATURE) <i>Erwin Clark</i>		Date	Time	Received by: (SIGNATURE)		Date	Time
Ice	Cooler Temp	Lab Comments							
(Y) N	Blank 5.1 P.C. T.K. OK								
		Relinquished by: (SIGNATURE)		Date	Time	Received by: (SIGNATURE)		Date	Time
		Relinquished by: (SIGNATURE)		Date	Time	Received for lab by: (SIGNATURE)		Date	Time
						<i>R. Smith</i>		4.10.15	10:00

Page 5 of 5