

## Gage, Hannah

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**From:** Gilliam, Allen  
**Sent:** Wednesday, August 31, 2016 9:21 AM  
**To:** merritt davis  
**Cc:** Gage, Hannah; Leamons, Bryan; Yates, Adam; scottytw@centurytel.net  
**Subject:** AR0035602\_Roach Manufacturing ARP001060 August 2016 semi annual Pretreatment report\_20160831  
**Attachments:** doc00530020160831084540.pdf

Richard,

Roach Manufacturing's August 2016 semi-annual Pretreatment report was received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically with the Metal Finishing standards in 40 CFR 433.17.

No further action is deemed necessary at this time.

Sincerely,

Allen Gilliam  
ADEQ State Pretreatment Coordinator  
501.682.0625

ec: Scotty Jones, City of Trumann Water and Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

A20JJ3



808 HWY 463 Trumann, AR 72472 Tel 870-483-7631 Fax 870-483-0222  
www.roachconveyors.com

August 26, 2016

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

Ref: Semi-Annual Report

Dear Mr. Gilliam:

Enclosed please find our semi-annual report for February 1, 2016, through July 31, 2016, which includes the lab test results from July 27, 2016.

Sincerely,

ROACH MANUFACTURING CORPORATION

A handwritten signature in black ink that reads 'Merritt Davis'.

Merritt Davis  
Manufacturing Engineering Manager

Enclosure

MD/ST

RECEIVED  
AUG 29 2016

complete/compliant  
AF

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Building quality conveyors since 1953.

**SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433**

<b>(1) IDENTIFYING INFORMATION</b>	
<p><b>A. LEGAL NAME &amp; MAILING ADDRESS</b></p> <p>Roach Manufacturing Corporation                  P. O. Box 1310                  Trumann, AR 72472</p>	<p><b>B. FACILITY &amp; LOCATION ADDRESS</b></p> <p>Roach Manufacturing Corporation                  808 Highway 463N                  Trumann, AR 72472</p>
<p><b>C. FACILITY CONTACT: Matthew M Davis      TELEPHONE NUMBER: 870-483-7631      e-mail: mdavis@roachconveyors.com</b></p>	
<b>(2) REPORTING PERIOD--FISCAL YEAR From Feb 1 to Jan 31    (Both Semi-Annual Reports must cover Fiscal Year)</b>	
<p><b>A. MONTHS WHICH REPORTS ARE DUE</b></p> <p><u>February</u> &amp; <u>August</u></p>	<p><b>B. PERIOD COVERED BY THIS REPORT</b></p> <p><b>FROM: February 1, 2016      TO: July 31, 2016</b></p>
<b>(3) DESCRIPTION OF OPERATION</b>	
<p><b>A. REGULATED PROCESSES</b></p> <p><b><u>CORE PROCESS(ES)</u></b></p> <p>CHECK EACH APPLICABLE BLOCK</p> <p>Electroplating                  Electroless Plating                  Anodizing  <input checked="" type="checkbox"/> Coating                  Chemical Etching and Milling                  Printed Circuit Board Manufacture</p> <p><b><u>ANCILLARY PROCESS(ES)*</u></b></p> <p>LIST BELOW EACH PROCESS USED IN THE FACILITY</p> <p><u>NONE</u></p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>_____</p> <p><small>*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS</small></p>	<p><b>B. CHANGES:</b>    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.</p> <p align="center"><b>NONE</b></p>
<p><b>C. Number of Regular Employees at this Facility</b></p> <p><u>208</u></p>	<p><b>D. [Reserved]</b></p>

**(4) FLOW MEASUREMENT**

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Cyanide)	2,040	10,000	5 days per week
' 403.6(e) Unregulated*			
' 403.6(e) Dilute			
Cooling Water			
Sanitary	5,774	6,000	Continuous
Total Flow to POTW	7,814	16,000	*****

\*"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 \_\_\_\_\_

X 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	0.00063	0.00106	0.0341	<0.0005	0.195	<0.0001	0.058	<0.005	<0.02
Ave Measured	<0.0001	0.00064	0.0153	<0.0005	0.0056	<0.0001	0.0070	<0.005	----

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

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

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

40CFR136 Preservation and Analytical Methods Use: X 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.

Matthew Merritt Davis  
(Typed Name)

  
(Corporate Officer or authorized representative)

Date of Signature 8/26/2016

**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.

Matthew Merritt Davis  
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

  
SIGNATURE

Manufacturing Engineering Manager  
OFFICIAL TITLE

8/26/2016  
DATE SIGNED

8/2/2016

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

Ref: Analytical Testing  
Lab Report Number: 16-209-0233  
Client Project Description: Analytical Testing

Dear Ms. Sherri Tribble:

Waypoint Analytical, Inc. received sample(s) on 7/27/2016 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.

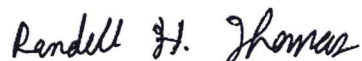
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established 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.

Certain parameters (chlorine, pH, dissolved oxygen, sulfite...) are required to be analyzed within 15 minutes of sampling. Usually, but not always, any field parameter analyzed at the laboratory is outside of this holding time. Refer to sample analysis time for confirmation of holding time compliance.

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







2790 Whitten Road, Memphis, TN 38133  
 Main 901.213.2400 ° Fax 901.213.2440  
 www.waypointanalytical.com

07154  
 Roach Conveyors  
 Ms. Sherri Tribble  
 808 Highway 463 North  
 Truman , AR 72472

Project Analytical Testing  
 Information :

Report Date : 08/02/2016  
 Received : 7/27/2016

*Randell H. Thomas*

Report Number : **16-209-0233**

**REPORT OF ANALYSIS**

Randy Thomas  
 Project Manager

Lab No : **92258**  
 Sample ID : **Stage 1,2,3,4**

Matrix: **Aqueous**  
 Sampled: **7/26/2016 0:00**

Test	Results	Units	ML	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	07/28/16 09:10	GHD	4500CNE-2011
Total Cadmium	<b>0.638</b>	µg/L	0.100	1	08/02/16 11:04	BKN	EPA-200.8
Total Chromium	<b>1.06</b>	µg/L	1.00	1	08/02/16 11:04	BKN	EPA-200.8
Total Copper	<b>34.1</b>	µg/L	0.500	1	08/02/16 11:04	BKN	EPA-200.8
Total Lead	<0.500	µg/L	0.500	1	08/02/16 11:04	BKN	EPA-200.8
Total Nickel	<b>195</b>	µg/L	0.500	1	08/02/16 11:04	BKN	EPA-200.8
Total Silver	<0.100	µg/L	0.100	1	08/02/16 11:04	BKN	EPA-200.8
Total Zinc	<b>58.0</b>	µg/L	5.00	1	08/02/16 11:04	BKN	EPA-200.8

**Qualifiers/  
 Definitions**

DF Dilution Factor

ML Method Quantitation Limit



07154  
 Roach Conveyors  
 Ms. Sherri Tribble  
 808 Highway 463 North  
 Truman , AR 72472

Project Analytical Testing  
 Information :

Report Date : 08/02/2016  
 Received : 7/27/2016

*Randell H. Thomas*

Report Number : **16-209-0233**

**REPORT OF ANALYSIS**

Randy Thomas  
 Project Manager

Lab No : **92259**  
 Sample ID : **Continuous Rinse**

Matrix: **Aqueous**  
 Sampled: **7/26/2016 0:00**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	07/28/16 09:10	GHD	4500CNE-2011
Total Cadmium	<0.100	µg/L	0.100	1	08/02/16 11:09	BKN	EPA-200.8
Total Chromium	<1.00	µg/L	1.00	1	08/02/16 11:09	BKN	EPA-200.8
Total Copper	<b>15.3</b>	µg/L	0.500	1	08/02/16 11:09	BKN	EPA-200.8
Total Lead	<0.500	µg/L	0.500	1	08/02/16 11:09	BKN	EPA-200.8
Total Nickel	<b>5.60</b>	µg/L	0.500	1	08/02/16 11:09	BKN	EPA-200.8
Total Silver	<0.100	µg/L	0.100	1	08/02/16 11:09	BKN	EPA-200.8
Total Zinc	<b>7.05</b>	µg/L	5.00	1	08/02/16 11:09	BKN	EPA-200.8

**Qualifiers/  
 Definitions**

DF

Dilution Factor

MQL

Method Quantitation Limit

**Cooler Receipt Form**

Customer Number: **07154**  
Customer Name: **Roach Conveyors**  
Report Number: **16-209-0233**

**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 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:





Kit ID:	0000065878
Initiated By:	Kenny Mulligan
Project Comment	

CHAIN-OF-CUSTODY

NO PO # 10  
6-2-16

Company Name	Company Number	Client Project Manager/Contact	Purchase Order Number
Roach Conveyors	07154	Mr. Merrick Davis	
Site Name	Project Number	<input type="checkbox"/> RUSH - Additional charges apply <input type="checkbox"/> Special Detection Limits(s) Date Results Needed	Method of Shipment <input type="checkbox"/> Fed Ex <input type="checkbox"/> UPS <input type="checkbox"/> USPS <input type="checkbox"/> Courier <input type="checkbox"/> Client Drop Off Other
LIMS Project ID	Project Manager Phone #	Project Manager Email	Site/Facility ID #
	(870) 483-7631	stribble@roachconveyors.com	

Date	Time	Sample ID	Matrix	Grab/Comp	# of Cont	Container Type	Preservation	Analyses
7-26	3:42	Stage 1,2,B,4	Aqueous		1	Plastic - Pint	NaOH - Sodium Hydroxide	CN
7-26	3:42	ψ (BJ)	Aqueous		1	Plastic - Pint	HNO3 - Nitric Acid	Cd, Cr, Cu, Pb, Ni, Ag, Zn
7-26	3:40	Stage 4 Continuous Rinse (B)	Aqueous		1	Plastic - Pint	NaOH - Sodium Hydroxide	CN
7-26	3:45	<del>Stage 1,2,B,4</del>	Aqueous		1	Plastic - Pint	HNO3 - Nitric Acid	Cd, Cr, Cu, Pb, Ni, Ag, Zn

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JUN 02 2016

ROACH MFG CORP

*[Signature]*

SHIPPED PP CC  
RATE UPS

For Laboratory Use Only			Sampled by (Name - Print)	Client Remarks/Comments			
Ice	Custody	Lab Comments	<i>Emin Clark Merrick Davis</i>				
Seals			Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time	
<u>Y/N</u>	<u>Y/N</u>		<i>[Signature]</i>	7-26-16 8:03	<i>[Signature]</i>	7-26-16 8:03	
Blank/ Cooler Temp			Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time	
<u>4.30</u>	<u>TS</u>		<i>[Signature]</i>	7-27-16 10:03	<i>[Signature]</i>	7-27-16 10:03	