### Gage, Hannah

From: Johnson, Lindsay

**Sent:** Monday, August 14, 2017 3:40 PM **To:** 'mdavis@roachconveyors.com'

Cc: Yates, Adam; Leamons, Bryan; McWilliams, Carrie; Gage, Hannah;

'scottytww@centurytel.net'

Subject: AR0035602\_Roach Manufacturing ARP001060 August 2017 semi annual Pretreatment

report\_20170814

Attachments: Roach Conveyors August 2017.pdf

### Good Afternoon,

Roach Manufacturing's August 2017 semi-annual Pretreatment report was received, reviewed, and deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and with the Metal Finishing standards in 40 CFR 433.17

No further action is deemed necessary at this time.

### Thank you,

Lindsay Johnson NPDES Staff Engineer ADEQ-Office of Water Quality (501)682-0045



808 HWY 463 Trumann, AR 72472

Tel 870-483-7631 Fax 870-483-0222

www.roachconveyors.com

August 3, 2017

Mr. Adam Yates
Ms. Lindsay Johnson
Pretreatment Coordinators
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock AR 72118-5317

Ref: Semi-Annual Report

AROD35L62

AUG 0 7 2017 AUG 0 8 2017

Dear Mr. Yates and Ms. Johnson:

Enclosed please find our semi-annual report for February 1, 2017, through July 31, 2017, which includes the lab test results from July 31, 2017.

Sincerely,

**ROACH MANUFACTURING CORPORATION** 

**Merritt Davis** 

**Manufacturing Engineering Manager** 

**Enclosure** 

MD/ST

Building quality conveyors since 1953.

## SEMI-ANNUAL REPORT FOR INDUSTRIAL USERS REGULATED BY 40CFR433 and an EPA/ADEQ requirement. Attn: Water Div/NPE

e of this form is <u>not</u> 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: Matthew M Davis  TELEPHONE NU	MBER: 870-483-7631 e-mail: mdavis@roachconveyors.com					
(2) REPORTING PERIODFISCAL YEAR From Feb 1 to J	an 31 (Both Semi-Annual Reports must cover Fiscal Year)					
A. MONTHS WHICH REPORTS ARE DUE	B. PERIOD COVERED BY THIS REPORT					
February & August	FROM: February 1, 2017 TO: July 31, 2017					
(3) DESCRIPTION OF OPERATION						
CORE PROCESS(ES)  CHECK EACH APPLICABLE BLOCK  Electroplating Electroless Plating Anodizing X 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					
C. Number of Regular Employees at this Facility  265	D. [Reserved]					

### (4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core &	1,862	10,000	5 days per week
Regulated (Cyanide)			
' 403.6(e) Unregulated*			
' 403.6(e) Dilute			
Cooling Water			
Sanitary	7,956	6,000	Continuous
Total Flow to POTW	9,818	16,000	******

<sup>\*&</sup>quot;Unregulated" has a precise legal meaning; see 40CFR403.6(e).

MEASUREMENT OF POLLUTANTS	
A. TYPE OF TREATMENT SYSTEM	B. COMMENTS ON TREATMENT SYSTEM
CHECK EACH APPLICABLE BLOCK	
Neutralization Chemical Precipitation and Sedimentation Chromium Reduction Cyanide Destruction Other X None	

C. THE INDUSTRIAL USER MUST PERFORM SAMPLING AND ANALYSIS OF THE EFFLUENT FROM ALL REGULATED PROCESSESCORE & 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	0.00031	<0.001	0.0139	<0.0005	0.0048	<0.0001	0.0071	<0.005	<0.02
Ave Measured	0.00029	<0.001	0.0137	<0.0005	0.0043	<0.0001	0.0067	<0.005	

Sample Locationat process tanks of 4-stage washer
sample Type (Grab or Composite)composites
Number of Samples and Frequency Collected two, once per report period
0CFR136 Preservation and Analytical Methods Use: X Yes No

# 40CFR433 SEMI-ANNUAL REPORT CON'D FACILITY NAME: \_\_\_Roach Manufacturing Corp. (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 8/3/2017

**CORPORATE ACKNOWLEDGEMENT (Optional)** 

	STATE OF ARKANSAS ) COUNTY OF)
	Before me, the undersigned authority, on this day personally appeared
	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 forCounty, Arkansas
	My commission expires
(Z) DO	
/) PU	I I HTION DDEVENTION ACT OF 1000 142 H C C 12101 .4
	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 a
The	'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 sow 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 a
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D FACILITY NAME	:Roach Manufacturing Corp
)3.12(l)]	
my direction or supervision and evaluate the information persons directly responsible and belief, true, accurate, a	n familiar with the information in this document in accordance with a system designed to assure in submitted. Based on my inquiry of the person or e for gathering the information, the information and complete. I am aware that there are significan f fine and imprisonment for knowing violations.
RIZED REPRESENTATIVE	SIGNATURE
er	8/3/2017 DATE SIGNED
)  -	personally examined and an my direction or supervision and evaluate the informatio persons directly responsible and belief, true, accurate, a, including the possibility of RIZED REPRESENTATIVE



8/2/2017

Roach Conveyors Mr. Merrick Davis 808 Highway 463 North Truman, AR, 72472

Ref:

**Analytical Testing** 

Lab Report Number: 17-212-0227

Client Project Description: Analytical Testing

Dear Mr. Merrick Davis:

Waypoint Analytical, Inc. received sample(s) on 7/31/2017 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 asreceived 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

Rendell H. Thomas

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.

Kentucky UST #41



07154

Lab No:

Roach Conveyors Mr. Merrick Davis 808 Highway 463 North Truman , AR 72472

Project

**Analytical Testing** 

Information:

Report Date: 08/02/2017

Received: 7/31/2017

Rendell H. Thomas

Report Number: 17-212-0227

90827

Sample ID: Stage 1,2,3,4

REPORT OF ANALYSIS

Randy Thomas Project Manager

Matrix: Aqueous

Sampled: 7/31/2017 7:00

Test	Results	Units	MQL	DF	Date / Time Analyzed	Ву	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	08/01/17 11:45	EWB	4500CNE-2011
Total Cadmium	0.292	μg/L	0.100	1	08/01/17 13:34	BKN	EPA-200.8
Total Chromium	<1.00	μg/L	1.00	1	08/01/17 13:34	BKN	EPA-200.8
Total Copper	13.9	μg/L	0.500	1	08/01/17 13:34	BKN	EPA-200.8
Total Lead	<0.500	μg/L	0.500	1	08/01/17 13:34	BKN	EPA-200.8
Total Nickel	4.36	μg/L	0.500	1	08/02/17 13:23	BKN	EPA-200.8
Total Silver	<0.100	μg/L	0.100	1	08/01/17 13:34	BKN	EPA-200.8
Total Zinc	7.12	μg/L	5.00	1	08/01/17 13:34	BKN	EPA-200.8

Qualifiers/ **Definitions** 

В MQL Analyte detected in blank Method Quantitation Limit DF

Dilution Factor



07154

Roach Conveyors Mr. Merrick Davis 808 Highway 463 North Truman , AR 72472

Report Number: 17-212-0227

Project

**Analytical Testing** 

Information:

Report Date: 08/02/2017

Received: 7/31/2017

Rendell H. Thomas

REPORT OF ANALYSIS

Randy Thomas Project Manager

Lab No : 90828 Matrix: Aqueous

Sample ID: Stage 4 Continuous Rinse Sampled: 7/31/2017 7:21

Test	Results	Units	MQL	MQL DF		Ву	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	08/01/17 11:45	EWB	4500CNE-2011
Total Cadmium	0.305	μg/L	0.100	1	08/01/17 13:37	BKN	EPA-200.8
Total Chromium	<1.00	μg/L	1.00	1	08/01/17 13:37	BKN	EPA-200.8
Total Copper	13.7	μg/L	0.500	1	08/01/17 13:37	BKN	EPA-200.8
Total Lead	<0.500	μg/L	0.500	1	08/01/17 13:37	BKN	EPA-200.8
Total Nickel	4.82	μg/L	0.500	1	08/02/17 13:27	BKN	EPA-200.8
Total Silver	<0.100	μg/L	0.100	1	08/01/17 13:37	BKN	EPA-200.8
Total Zinc	6.72	μg/L	5.00	1	08/01/17 13:37	BKN	EPA-200.8

Qualifiers/ Definitions

B MQL Analyte detected in blank Method Quantitation Limit DF

Dilution Factor



### **Cooler Receipt Form**

Customer Number: 07154

Customer Name: Roach Conveyors
Report Number: 17-212-0227

#### Shipping Method

		Silippi	ng wemou			
○ Fed Ex	○ US Postal	◯ Lab		Other:		
UPS	Client	O Cou	rier	Thermometer ID:	#21	
Shipping contain	er/cooler uncomprom	ised?	Yes	○ No		
Number of coole	rs received		1			
Custody seals in	tact on shipping conta	niner/cooler?	Yes	○ No	Not Requi	red
Custody seals in	tact on sample bottles	s?	O Yes	○ No	Not Requi	red
Chain of Custody	/ (COC) present?		Yes	○ No		
COC agrees with	sample label(s)?		Yes	○ No	53,990	
COC properly co	mpleted		Yes	○ No		
Samples in prop	er containers?	XXXX	Yes	○ No		_
Sample containe	rs intact?		Yes	○ No		
Sufficient sample	volume for indicated	test(s)?	Yes	○ No		
All samples rece	ived within holding tim	ne?	Yes	○ No		
Cooler temperatu	ure in compliance?		Yes	○ No		
	arrived at the laborate onsidered acceptable un.		Yes	○ No		
Water - Sample	containers properly pr	eserved	Yes	○ No	○ N/A	
Water - VOA vial	s free of headspace		○ Yes	○ No	● N/A	
Trip Blanks recei	ved with VOAs		O Yes	○ No	● N/A	
Soil VOA method	l 5035 – compliance d	criteria met	O Yes	○ No	N/A	
High concent	ration container (48 h	r)	☐ Lo\	w concentration EnC	ore samplers (48 h	ır)
High concentr	ration pre-weighed (m	ethanol -14	d) Lov	w conc pre-weighed	vials (Sod Bis -14 o	(t
Special precaution	ons or instructions inc	luded?	O Yes	No		
Comments:	,					
Signatu	re: Tory Phillips		Date	& Time: 07/31/201	7 09:58:08	





Kit ID:	0000083894							
Initiated By:	Kenny Mulligan							
Project Com	Project Comment							

### **CHAIN-OF-CUSTODY**

Company N	lame		Company Number		Client Project Manager/Contact				Purchase Order Number			
Roach Conve	eyors		07154		Mr. Merrick Davis							
Site Name		a	Project Number	ect Number			itional charges apply ction Limits(s)	Method of Shipment  Fed Ex UPS USPS  Courier Client Drop Off  Other				
LIMS Proje	ct ID		Project Manager Phone	100	Project Manager Email  NDAVIS @ Roscheaveyors.com			Site/Facility ID #				
			(870) 483-7631	1	stribble@roachconveyors.com							
Date	Time		Sample ID	Matrix	Grab/ Comp	# of Cont	Container Type	Pres	ervation	Analyses		
7/31/17	7:00	Stage	1,2,3,4	Aqueous		1	Plastic - Pint		l - Sodium droxide	CN		
7/31/17	7:00		1,2,3,4	Aqueous		1	Plastic - Pint	HNO3 - Nitric Acid		Cd, Cr, Cu, Pb, Ni, Ag, Zn		
7/31/17	7:21	Contin	tage 4 wous Rinse stage 4 nuous Rinse	Aqueous		1	Plastic - Pint	NaOH - Sodium Hydroxide		CN		
7/11/17	7:21	Conti	itage 4 nuous Ringe	Aqueous		1	Plastic - Pint	2 1000 =	3 - Nitric Acid	Cd, Cr, Cu, Pb, Ni, Ag, Zn		

For Laboratory Use Only			Sampled by (Name - Print)	Client Remarks/Comments		
Ice	Custody	Lab Comments	Merritt Davis		$\cap$	
	Seals		Relinquished by: (SIGNATURE)		Received by (SIGNATURE)	Date Time
y)N	Y/N		Most Dag	7/31/17 7:50	6	15/1 750
V		g.	Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time
Blank/Cooler Temp		(	The and	7/3/12927		
T21			Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time
1.3°C	70				(Ameth 7.3)	17 092