

Jamie Belcourt (adpce.ad)

From: Jamie Belcourt (adpce.ad)
Sent: Thursday, October 20, 2022 3:39 PM
To: mdavis@roachconveyors.com
Cc: Stacie Wassell (adpce.ad); Richard Healey (adpce.ad); David Ramsey (adpce.ad); Carrie McWilliams (adpce.ad)
Subject: Roach Manufacturing - August 2022 Semiannual Pretreatment Report
Attachments: Semi-Report Aug 2022 Revised.pdf

Mr. Davis,

Thank you for submitting Roach Manufacturing's (Pretreatment ID ARP001060 & AFIN 56-0031) February 1, 2022 – July 31, 2022 semiannual pretreatment report. The report was received late, but was reviewed and deemed complete with the reporting requirements in 40 CFR 403.12(e) and the Metal Finishing Standards in 40 CFR 433.

In regards to the submitted report (attached), samples were collected on August 5, 2022. As noted above, the reporting period for this semiannual pretreatment report is February 1, 2022 – July 31, 2022. This sample collection date is outside of the reporting period. 40 C.F.R. 402.12(g)(3) states that the reports required in paragraphs (b), (d), (e) and (h) of this section [40 C.F.R. 403.12] must be based upon data obtained through appropriate sampling and analysis performed during the period covered by the report, which data are representative of conditions occurring during the reporting period.

Additionally, issues were noted with sampling procedures and holding times on the chain of custody and analytical report documentation that was submitted. Specifically, the samples were collected on August 5, 2022 and were received in the laboratory for analysis on the same date. Analysis was not conducted for cyanide until August 12, 2022, and the remaining seven (7) analytes (cadmium, chromium, copper, lead, nickel, silver, and zinc) were analyzed on August 9, 2022. This is a period of seven (7) days for cyanide analysis and four (4) days for the other analytes, following sample collection.

In the future, please ensure samples collected for the semiannual pretreatment report are collected during the period covered by the report. Further, please ensure that collected samples are analyzed as soon as possible, proper sampling procedures are utilized, and ensure that custody seals are also utilized and intact. Future instances of noncompliance with the procedures set forth in 40 C.F.R. 403.12 and 40 C.F.R. Part 136 may result in enforcement action.

Please reply to this email to let me know that you have received it.

If you have any questions or concerns, or if I can be of any assistance, please do not hesitate to reach out.

Regards,

Jamie Belcourt | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
Policy and Administration
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT



808 HWY 463 Trumann, AR 72472 Tel 870-483-7631 Fax 870-483-0222

www.roachconveyors.com

August 12, 2022

Pretreatment Coordinators
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock AR 72118-5317

Ref: Semi-Annual Report

Dear Pretreatment Coordinators:

Enclosed please find our semi-annual report for February 1, 2022, through July 31, 2022, which includes the samples from August 5, 2022.

Sincerely,

ROACH MANUFACTURING CORPORATION

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

Merritt Davis
Manufacturing Engineering Manager

Enclosure

MD/ST

Building quality conveyors since 1953.

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: Matthew M Davis TELEPHONE NUMBER: 870-483-7631 e-mail: mdavis@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, 2022 TO: July 31, 2022

(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

*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
306

D. [Reserved]

(4) FLOW MEASUREMENT

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

| Process | Average | Maximum | Type of Discharge |
|---------------------------------------|---------|---------|-------------------|
| Regulated (Core & Regulated (Cyanide) | 2,382 | 10,000 | 5 days per week |
| ' 403.6(e) Unregulated* | | | |
| ' 403.6(e) Dilute | | | |
| Cooling Water | | | |
| Sanitary | 14,655 | 6,000 | Continuous |
| Total Flow to POTW | 17,037 | 18,000 | ***** |

*"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 _____

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 | 0.00012 | <0.001 | 0.508 | 0.00088 | 0.0007 | <0.0001 | 0.0901 | <0.005 | <0.02 |
| Ave Measured | <0.0001 | <0.001 | 0.506 | 0.00084 | 0.00062 | <0.0001 | 0.0872 | <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: Yes No

(6) CERTIFICATION

A. [Reserved]

[Reserved]

B. CHECK ONE: 433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED 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 8/12/2022

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.

Matthew Merritt Davis
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

Manufacturing Engineering Manager
OFFICIAL TITLE

8/12/2022
DATE SIGNED

8/12/2022

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

Ref: Analytical Testing
Lab Report Number: 22-217-0145
Client Project Description: Semi-Annual

Dear Ms. Sherri Tribble:
Waypoint Analytical, LLC. received sample(s) on 8/5/2022 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. Where the laboratory was not responsible for the sampling stage (refer to the chain of custody) results apply to the sample as received.

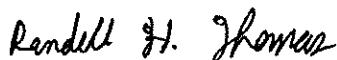
The analytical data has been validated using standard quality control measures performed as required by the analytical method. Quality Assurance, method validations, instrumentation maintenance and calibration for all parameters (NELAP and non-NELAP) were performed in accordance with guidelines established by the USEPA (including 40 CFR 136 Method Update Rule May 2021) 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.





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

Certification Summary

Laboratory ID: WP MTN: Waypoint Analytical, LLC., Memphis, TN

| State | Program | Lab ID | Expiration Date |
|----------------|-----------------------|------------|-----------------|
| Alabama | State Program | 40750 | 02/28/2023 |
| Arkansas | State Program | 88-0650 | 02/07/2023 |
| California | State Program | 2904 | 06/30/2023 |
| Florida | State Program - NELAP | E871157 | 06/30/2023 |
| Georgia | State Program | C044 | 02/18/2023 |
| Georgia | State Program | 04015 | 06/30/2023 |
| Illinois | State Program - NELAP | 200078 | 10/10/2022 |
| Kentucky | State Program | 80215 | 06/30/2023 |
| Kentucky | State Program | KY90047 | 12/31/2022 |
| Louisiana | State Program - NELAP | LA037 | 12/31/2022 |
| Louisiana | State Program - NELAP | 04015 | 06/30/2023 |
| Mississippi | State Program | MS | 02/11/2023 |
| North Carolina | State Program | 415 | 12/31/2022 |
| Pennsylvania | State Program - NELAP | 68-03195 | 05/31/2023 |
| South Carolina | State Program | 84002 | 06/30/2022 |
| Tennessee | State Program | 02027 | 02/11/2023 |
| Texas | State Program - NELAP | T104704180 | 09/30/2022 |
| Virginia | State Program | 00106 | 06/30/2023 |
| Virginia | State Program - NELAP | 460181 | 09/14/2022 |



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Sample Summary Table

Report Number: 22-217-0145

Client Project Description: Semi-Annual

| Lab No | Client Sample ID | Matrix | Date Collected | Date Received |
|---------------|--------------------------|---------------|-----------------------|----------------------|
| 96032 | Stage 4 Continuous Rinse | Aqueous | 08/05/2022 11:10 | 08/05/2022 |
| 96033 | Stage 1,2,3,4 | Aqueous | 08/05/2022 11:40 | 08/05/2022 |



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07154

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

Project Semi-Annual

Information :

Report Date : 08/12/2022
 Received : 08/05/2022

Randell H. Thomas

Report Number : 22-217-0145

REPORT OF ANALYSIS

Randy Thomas
 Project Manager

Lab No : 96032

Matrix: Aqueous

Sample ID : Stage 4 Continuous Rinse

Sampled: 8/5/2022 11:10

| Test | Results | Units | MQL | DF | Date / Time Analyzed | By | Analytical Method |
|----------------|--------------|-------|-------|----|----------------------|-----|-------------------|
| Cyanide, Total | <0.005 | mg/L | 0.005 | 1 | 08/12/22 10:34 | FMM | 4500CNE-2016 |
| Cadmium | <0.100 | µg/L | 0.100 | 1 | 08/09/22 21:23 | BKN | EPA-200.8 |
| Chromium | <1.00 | µg/L | 1.00 | 1 | 08/09/22 21:23 | BKN | EPA-200.8 |
| Copper | 506 | µg/L | 0.500 | 1 | 08/09/22 21:23 | BKN | EPA-200.8 |
| Lead | 0.888 | µg/L | 0.500 | 1 | 08/09/22 21:23 | BKN | EPA-200.8 |
| Nickel | 0.618 | µg/L | 0.500 | 1 | 08/09/22 21:23 | BKN | EPA-200.8 |
| Silver | <0.100 | µg/L | 0.100 | 1 | 08/09/22 21:23 | BKN | EPA-200.8 |
| Zinc | 90.1 | µg/L | 20.0 | 1 | 08/09/22 21:23 | BKN | EPA-200.8 |

Qualifiers/ Definitions DF Dilution Factor MQL Method Quantitation Limit



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07154

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

Project Semi-Annual
 Information :

Report Date : 08/12/2022
 Received : 08/05/2022

Randell H. Thomas

Report Number : 22-217-0145

REPORT OF ANALYSIS

Randy Thomas
 Project Manager

Lab No : 96033
 Sample ID : Stage 1,2,3,4

Matrix: Aqueous
 Sampled: 8/5/2022 11:40

| Test | Results | Units | ML | DF | Date / Time Analyzed | By | Analytical Method |
|----------------|--------------|-------|-------|----|----------------------|-----|-------------------|
| Cyanide, Total | <0.005 | mg/L | 0.005 | 1 | 08/12/22 10:34 | FMM | 4500CNE-2016 |
| Cadmium | 0.120 | µg/L | 0.100 | 1 | 08/09/22 21:28 | BKN | EPA-200.8 |
| Chromium | <1.00 | µg/L | 1.00 | 1 | 08/09/22 21:28 | BKN | EPA-200.8 |
| Copper | 508 | µg/L | 0.500 | 1 | 08/09/22 21:28 | BKN | EPA-200.8 |
| Lead | 0.844 | µg/L | 0.500 | 1 | 08/09/22 21:28 | BKN | EPA-200.8 |
| Nickel | 0.700 | µg/L | 0.500 | 1 | 08/09/22 21:28 | BKN | EPA-200.8 |
| Silver | <0.100 | µg/L | 0.100 | 1 | 08/09/22 21:28 | BKN | EPA-200.8 |
| Zinc | 87.2 | µg/L | 20.0 | 1 | 08/09/22 21:28 | BKN | EPA-200.8 |

**Qualifiers/
 Definitions**

DF

Dilution Factor

ML

Method Quantitation Limit

Shipment Receipt Form

Customer Number: **07154**
 Customer Name: **Roach Conveyors**
 Report Number: **22-217-0145**

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/boxes 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 Present |
| Custody seals intact on sample bottles? | <input type="radio"/> Yes | <input type="radio"/> No | <input checked="" type="radio"/> Not Present |
| 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:

Signature:

Date & Time:



| | |
|-----------------|--------------|
| Kit ID: | 187823 |
| Initiated By: | Mick Parrish |
| Initiated Date: | 7/26/2022 |
| Project Comment | |

CHAIN-OF-CUSTODY

| | | | |
|---------------------------------|---|--|--|
| Company Name Roach Conveyors | Company Number 07154 | Client Project Manager/Contact Mr. Merritt Davis | Purchase Order Number |
| Site Name Semi-Annual | Project Number | <input checked="" 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 # (870) 227-1361 | Project Manager Email mdavis@roachconveyors.com | Site/Facility ID # |

| Date | Time | Sample ID | Matrix | Grab/Comp | # of Cont | Container Type | Preservation | Analyses |
|--------|-------|--------------------------|---------|-----------|-----------|----------------|-------------------------|----------------------------|
| 8/5/22 | 11:10 | Stage 4 Continuous Rinse | Aqueous | Comp | 1 | Plastic - Pint | NaOH - Sodium Hydroxide | CN |
| 8/5/22 | 11:25 | Stage 4 Continuous Rinse | Aqueous | Comp | 1 | Plastic - Pint | HNO3 - Nitric Acid | Cd, Cr, Cu, Pb, Ni, Ag, Zn |
| 8/5/22 | 11:40 | Stage 1,2,3,4 | Aqueous | Comp | 1 | Plastic - Pint | NaOH - Sodium Hydroxide | CN |
| 8/5/22 | 11:55 | Stage 1,2,3,4 | Aqueous | Comp | 1 | Plastic - Pint | HNO3 - Nitric Acid | Cd, Cr, Cu, Pb, Ni, Ag, Zn |


 22-217-0145
 07154
 08-05-2022
 Roach Conveyors
 Semi-Annual
 14:59:12

| | | | | | | | | |
|-------------------------------------|------------------------|--------------|---|---------------------------|--|---------------------------------|--|--|
| For Laboratory Use Only | | | Sampled by (Name - Print) Merritt Davis | | Client Remarks/Comments | | | |
| Ice (Y/N) | Custody Seals (Y/N) | Lab Comments | Relinquished by: (SIGNATURE) Merritt Davis | Date Time 8/5/22 12:45 | Received by: (SIGNATURE) Jimmy Creecy | Date Time 8/5/22 12:45 | | |
| Blank/Cooler Temp 0.01799 SHT | | | Relinquished by: (SIGNATURE) Jimmy Creecy | Date Time 8-5-22 2:16 | Received by: (SIGNATURE) | Date Time | | |
| | | | Relinquished by: (SIGNATURE) | Date Time | Received by: (SIGNATURE) | Date Time | | |
| | | | Relinquished by: (SIGNATURE) | Date Time | Received by: (SIGNATURE) | Date Time 1416 08/05/2022 | | |