



A R K A N S A S
Department of Environmental Quality

CERTIFIED MAIL, RETURN RECEIPT REQUESTED (7006 3450 0003 4073 8255)

March 5, 2010

G. W. Roach, Jr., President
Roach Manufacturing Corporation
P O Box 1310
Trumann, AR 72472

Attention: Sherri Tribble, Office Manager

Re: State Pretreatment Reporting Requirements
(AFIN 56-00031 ARP001060 AR0035602)

Dear Ms. Tribble:

In reference to Roach Manufacturing Corporation [RMC] Application/Baseline Monitoring Report (BMR) dated February 2, 2010, RMC is not required at this time to have an ADEQ permit prior to commencing discharge to the City of Trumann Publicly Owned Treatment Works [POTW--local municipal sewer system]. Please be aware that the City of Trumann may require a local permit. RMC is required to demonstrate compliance with federal and state laws by submitting reports to ADEQ. ADEQ has reviewed the BMR. Based on the information in the BMR, the department has determined that RMC wastewater is regulated by federal and state laws at 40 CFR 433.

The contents of 40CFR403 and 40CFR433 may be viewed on the internet at:

http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?sid=401d1fa5a85e820674e669b8a3edf23b&c=ecfr&tpl=/ecfrbrowse/Title40/40cfrv28_02.tpl

Industrial users with processes regulated by categorical pretreatment standards [40CFR433, et al] whose discharge enters, can enter, or will enter a POTW (local municipal sewer system) must submit **40CFR403.12** reports to the Control Authority [ADEQ].

Please note that RMC was not allowed by regulation to commence discharging from the regulated processes until the facility was capable of meeting pretreatment standards on a consistent basis. Please refer to §403.6(b) for more details. Therefore, RMC must presently be in compliance with 40 CFR Part 433.17 pretreatment standards.

RMC must submit a report to ADEQ on or before August 31, 2010.

The purpose of this letter is to supply additional information on reporting requirements to comply with §§403.12 & 433.17 of Arkansas Act 472 of 1949. The department appreciates RMC's past efforts. To aid Roach Manufacturing's future efforts, ADEQ offers the following:

CATEGORICAL DETERMINATION [§403.6(a)]

1. RMC may request certification from ADEQ on whether their processes fall within a particular subcategory. RMC is a new source. New sources must request this certification before commencing regulated discharge. Nonetheless, RMC processes appear to be regulated by §433.17.

a. APPLICABILITY---In 40CFR433.10 find *"the provisions of this subpart apply to plants which perform any of the following six metal finishing operations on any basis material: Electroplating, Electroless Plating, Anodizing, Coating (chromating, phosphating, and coloring), Chemical Etching and Milling, and Printed Circuit Board Manufacture. If any of those six operations are present, then this part applies to discharges from those operations and also to discharges from any of the following 40 process operations:"* In 40CFR433.17 find *"any new source subject to this subpart that introduces pollutants into a publicly owned treatment works must comply with 40 CFR Part 403 and"* the pretreatment standards in this letter. In 40CFR403.3(k)(1) find *"The term 'New Source' means...construction...commenced after the publication of proposed Pretreatment Standards"*. The 40CFR433 proposal was published on August 31, 1982.

b. EVIDENCE---The Roach Manufacturing Trumann facility performs coating (phosphatizing) on steel and aluminum, basis materials; and Roach Manufacturing installed the process in May 2006 and, hence, is a "new source". Since the wastewater (containing pollutants) is introduced into the Trumann POTW. In accordance with 40CFR433 [Subpart A--Metal Finishing Subcategory], the Roach Manufacturing Trumann facility falls under §433.17 *Pretreatment standards for new sources (PSNS)*.

2. In accordance with §403.6(a)(4)(i)&(iv), this letter serves as the written determination that the wastewater to be discharged from the Roach Manufacturing facility in Trumann, Arkansas will fall under the 40 CFR Part 433 pretreatment standards. A copy of this letter/determination has been mailed to the POTW (% Scotty Jones, Manager).

3. In accordance with §403.6(a)(4)(ii), a copy of the application has been forwarded to U S EPA Region VI Water Management Division Director (% Rudy Molinda. Regional Pret Coor) in Dallas, TX.

4. In accordance with §403.6(a)(5), Roach Manufacturing may contest this determination within 30 days following the date of receipt of this letter. If Roach Manufacturing does not contest the determination, Roach Manufacturing must comply with 40CFR403.12 (national and state pretreatment reporting requirements).

5. Pending a "No Contest" decision Roach Manufacturing must submit the 90 day compliance report by August 31, 2010.

If Roach Manufacturing has (or installs) other processes subject to National/State categorical pretreatment standards in the Trumann, Arkansas facility and wastewater from these processes enters or can enter the Trumann POTW, then Roach Manufacturing may have to submit additional reports to the Control Authority [ADEQ] in accordance with 40CFR403.12.

February 12, 2010

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BMR and 90 DAY REPORT REQUIREMENTS [§403.12(b) & (d)]

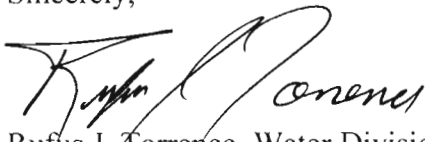
In accordance with **§403.12(b)** RMC was required to submit a Baseline Monitoring Report (BMR) to ADEQ at least 90 days before commencing discharge to the City. RMC has successfully submitted the delinquent BMR. In accordance with **§403.12(d)** within ninety (90) days after commencing regulated discharge RMC was required to submit a "final" BMR (90 day compliance report). RMC must satisfy the following requirements by submitting a 90 day report. A blank form is enclosed. This form is available electronically by contacting torrence@adeq.state.ar.us (Rufus Torrence).

All analyses must have the following:

- a. Chain of custody forms must be submitted with the BMR which indicates the time, date and place of sampling. The forms must also indicate the type of samples (composite or grab) and kind of preservation employed; preservation techniques must conform with **§136**. Please attach these forms to the new BMR. Chain-of-Custody forms do not have to be submitted with subsequent semi-annual reports but **§403.12(o)(2)** requires RMC to keep these forms and other pertinent information at least three years.
- b. The lab analyses must show that **§136** methods were employed.
- c. Referring to Section 6 in the BMR form, RMC must, in accordance with **§403.12(b)(5)(vii)**, certify *"that such sampling and analysis is representative of normal work cycles and expected pollutant Discharges to the POTW"*.

If RMC or an authorized representative has questions or needs more information, please contact the Department at (501) 682-0626 or torrence@adeq.state.ar.us .

Sincerely,



Rufus J. Torrence, Water Division Engineer

Enclosures: (1) RMC -DIAGRAM.wpc
(2) Blank BMR form

cc: Cindy Garner, ADEQ Enforcement (via email)

Rudy Molinda, US EPA Region VI (via email)

Scotty Jones, Manager
106 E Main St
Trumann, AR 72472

FINAL BASELINE MONITORING REPORT

FOR A

40CFR433 CATEGORICAL INDUSTRY

90 Day Compliance Report per §403.12(d)

Instructions: In accordance with 40CFR403.12(b) & (d) Industrial Users subject to categorical Pretreatment Standards are required to submit to ADEQ a report which contains the information in paragraphs (b)(1)-(7). Use of this form is not an EPA requirement. The User is responsible for submitting a complete and accurate report. Nonetheless, the User may complete this form in as much detail as possible. Include additional information on attached sheets as necessary where space is limited.

Return to: Water Div/NPDES Pretreatment

(1) User Identifying Information [§403.12(b)(1)]:

A. Legal Name: _____

Mailing Address: _____

_____ Zip: _____

B. Facility Name: _____

Location: _____

_____ Zip: _____

C. Name of Owners: _____

D. Name of Operators: _____

E. Facility Contact (Provide the name, title & phone number of a designated person to contact if additional information is necessary):

F. Number of Employees _____ G. Number of Shifts _____

H. Number of Months per Calendar Year which Plant normally operates _____

I. Publicly Owned Treatment Works (POTW) (Provide the name of the sewerage authority, municipality, etc. that receives the wastewater discharges from this facility--If this facility is not connected to a sewerage system describe where wastewater is discharged)

J. Provide the date the facility began regulated discharge to the POTW (sewerage authority, municipality, etc.)

Date facility installed/commence construction of 40CFR433 Core operation(s) _____

(2) User's Permits [§403.12(b)(2)]:

Describe all environmental control permits held by or for the facility

Describe Title of the Permit	Permit No.	Issuing Office	Exp. Date

(3) Description of User Operations [§403.12(b)(3)]:

A. List Raw Material/Basis Metals Used:

B. List Toxic Organics (TTO) & alloy metals and their source (Name of Chemical/Basis Metal):

C. Describe Manufacturing or Service Activities Conducted and the Final Products: _____

D. Summarize each Point Source Category (This form is for only the Metal Finishing Category):

Source Category	
Source Category	
Source Category	

3.D (Con'd) Summarize each Core process [Electroplating, Electroless Plating, Anodizing, Coating (chromating, phosphating & coloring), Chemical Etching & Milling or Printed Circuit Board Manufacture]:

Process Description*	Pretreatment Standard Category	Subpart	SIC Code	Date Process was Installed
	40CFR433	A		

*Process Description must be exactly as shown in the applicable 40CFR SubPart; for example, 40CFR433 SubPart A lists "Electroplating", "Electroless Plating", "Anodizing", "Coating", "Chemical Etching and Milling" and "Printed Circuit Board Manufacture".

E. Provide on a separate sheet(s):

- (i) A schematic drawing/chart of manufactured parts flow through each regulated process that generates wastewater--optional for users with only concentration-based standards.
- (ii) A schematic drawing showing all wastewater flows (regulated and unregulated), location of any treatment system, and sampling locations and flows for each individual wastestream. Show points of discharge to the POTW from regulated processes (blank schematic enclosed).

(4) User Flow Measurement [§403.12(b)(4)]:

A. Total Plant Flow in Gallons per Day (gpd):

Average _____ Maximum _____

B. Individual Process Flows in Gallons per Day¹ (gpd)

¹Referring to 40CFR403.6(c)(1) average flows must be for a 30-day period. Batch discharges which are less frequent than monthly should be normalized to a 365-day period

STREAMS² include non-contact cooling water, sanitary waste, etc.	Dilute wastestreams Average Flow Rate (gpd)	Max. Flow Rate (gpd)	Type Discharge ³
Regulated Streams			
Unregulated Streams			
Dilute Streams			
Non-Contact Cooling Water			
Sanitary Wastewater			

² Regulated processes have wastestreams regulated by federal standards.
Unregulated processes have wastestreams (which are not regulated by federal standards) with federally regulated parameters.
Nonregulated processes have unregulated and/or dilute wastestreams.

³ Show type: for example--(Continuous, Batch (Monthly, Semi-annually, etc), Intermittent (5 days/week, 25 days/30-day period, etc.)

(5) Measurement of Pollutants in User's Discharge to POTW [§§403.6(a) & 403.12(5)]:

A. (i) Cite Evidence Why Subpart A (40CFR433) is applicable to each Core process⁴:

Core Process _____

Core Process _____

Core Process _____

(ii) Provide on a separate sheet a description of all wastewater treatment utilized (show treatment system location in relation to process flows and sampling points on schematic drawing required in Section 3.E above).

B. Analysis of Regulated Flows: The industrial user must perform sampling and analysis of the effluent from all regulated processes which discharge into the POTW (after treatment, if applicable). Provide the analytical data for the regulated processes in the appropriate space below.

CONCENTRATIONS (mg/l)									
Basis	Pollutant								
	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO
Maximum									
Average									

C. Analysis of Total Plant Flow (Mark each blank "N/A" if not appropriate/applicable)
 In accordance with 40CFR403.6(e) an industrial user may sample and analyze the total plant flow and calculate an alternate concentration limit using the combined wastestream formula if regulated process flows are mixed with other flows prior to treatment and/or sampling. Record the analytical results for all regulated pollutants below. Record the calculated concentration limits as well as the actual measured concentrations.

CONCENTRATIONS (mg/l)									
Basis ⁵ AMAC --- Actual Measured Average Concentration from Lab results	Pollutant								
	Cd	Cr	Cu	Pb	Ni	Ag	Zn	CN	TTO
MAC									
AAC									
AMMC									
AMAC									

⁴ §403.6(a)(2)(ii)-Optional for Existing Sources and for New Sources which have requested certification.

⁵ MAC --- Maximum Alternate Concentration as determined by ADEQ
 AMMC --- Actual Measured Maximum Concentration from Lab results

AAC --- Average Alternate Concentration as determined by ADEQ
 AMAC --- Actual Measured Average Concentration from Lab Results

D. User Sample Location: _____

Sample Type (Composite samples are required except where not feasible or where grab samples are specifically required-- refer to 40CFR403.12(b)(5)(iii): _____

Number of Samples Taken: _____ Frequency (Daily, Weekly, etc) _____

Analytical Methods Used (Must be in accordance with 40CFR136--for example: EPA 608, 625, etc.) _____

(6) Certifications [§§403.12(b)(5)(viii) & 403.12(b)(6)]:

40 CFR 403.12(b)(6) Compliance Certification

A. Are applicable categorical pretreatment standards being met on a consistent basis? YES ___ NO ___

B. If no, do you require:

(i) Additional operation and maintenance (O&M) to achieve compliance? YES ___ NO ___

(ii) New or additional pretreatment facilities to achieve compliance? YES ___ NO ___

40 CFR 403.12(b)(5)(viii) Representative Certification

I certify, to the best of my knowledge, that the sampling and analysis as shown in Section 5 above is representative of the User's normal work cycles and the expected Discharges to the POTW.

In accordance with 40CFR403.12(b)(5)(viii) & (6) a qualified professional must complete and sign these certifications in the space below.

Name & Title _____
 Qualified Professional (Please Type or Print)

 Signature

Date _____

(7) A. If additional O&M or new or additional pretreatment will be required to meet categorical pretreatment standards on a consistent basis, provide an explanation in an attachment. In accordance with §403.12(b)(7) as of February 15, 1986 all 40CFR433 Metal Finishers were required to be in compliance. New sources must not commence discharge until compliance is possible.

B. Signatory Requirement [40 CFR 403.12(l)]

40 CFR 403.12(l)(3) Authorization to Sign Environmental Reports

I hereby authorize persons filling the position title of _____, responsible for the overall operation of the _____ facility in _____, Arkansas, to sign all regular reports required by National Pretreatment Standards--pursuant to ADEQ rules and/or Clean Water Act (CWA) regulations. This written authorization is provided in accordance with 40 CFR 403.12(l) and comparable state regulations.

Corporate official name & title here

Signature

Date

40 CFR 403.6(a)(2)(ii) Certification

I certify under penalty of law that I have personally examined and am familiar with the information in this Baseline Monitoring Report and all attachments, and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the report, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

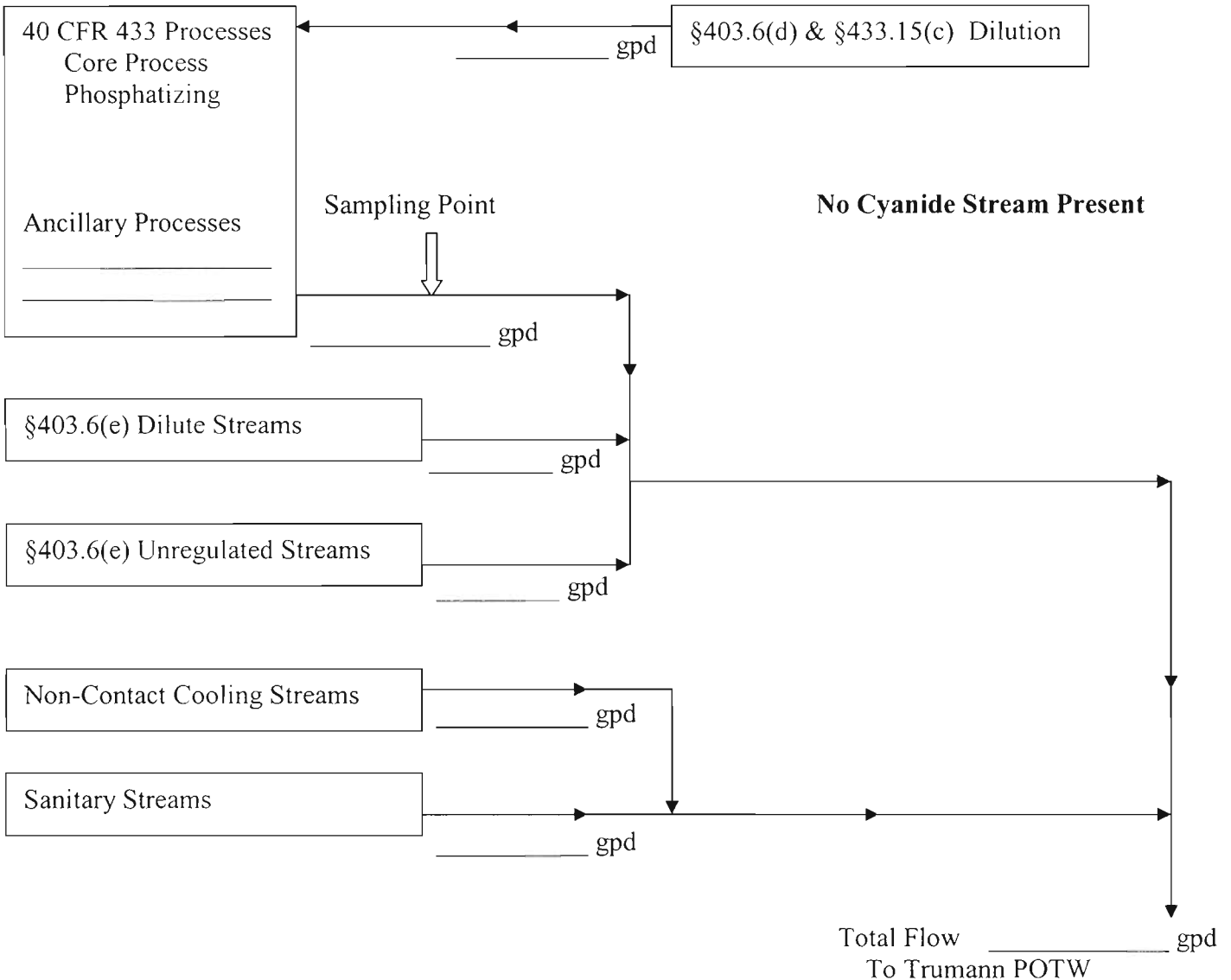
Name of Authorized Representative (Please Type or Print)

Official Title (Please Type or Print)

Signature

Date

Roach Manufacturing Cor Trumann, Arkansas



If a stream is not present, show NOT PRESENT or N/P. If a stream is present, the wastewater can enter the POTW but currently has no flow, show 0.0 gpd. If a stream is present but the wastewater cannot enter the POTW, show Zero Discharge or Z/D. If an unregulated stream is present but the User has decided not to declare it at this time, show N/P.

Signature of §403.12(b) Professional

Date

I certify under penalty of law that I have personally examined and am familiar with the information in this document and that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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.

Plant Manager or the authorized §403.12(l) official

Date