



ARKANSAS
Department of Environmental Quality

August 6, 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 Roach Tracking #ARP001060 City of Trumann NPDES Permit #AR0035602)

Dear Ms. Tribble:

In reference to Roach's Baseline Monitoring Report [BMR] dated July 20, 2010, the Department (ADEQ) has determined that the BMR is acceptable for verifying compliance with 40CFR433.17. Since the Department is not requiring an Indirect Discharger Permit at this time, Roach may continue to discharge regulated wastewater to the POTW (Publicly Owned Treatment Works / local municipal sewer system) as long as the City of Trumann consents.

In accordance with 40CFR403.12(e) industrial users with processes regulated by categorical pretreatment standards (40CFR433) must submit semi-annual reports to the Control Authority (ADEQ) to demonstrate continued compliance when the discharges from the regulated processes enter, can enter or will enter a POTW. Roach's semi-annual reports are due in February and August of every year. The next report is due in this office in February 2011 by close of business (4:30pm CST) on February 28, 2011. In addition, Roach did not submit the diagram attached to the Department's letter dated March 5, 2010. Please complete this diagram (copy attached) and submit the completed and signed diagram with the February 2011 semi-annual report.

Every semi-annual report must contain the results of sampling and analysis. Roach may submit a Toxic Organic Management Plan (TOMP) in lieu of testing for toxic organics (TTOs) which are not reasonably expected to be present in the discharge. The TOMP has essentially two parts (SMP & Certification):

- a. The Solvent Management Plan (SMP) describes how Roach will control TTOs and need be submitted only once and updated if necessary.
- b. The Certification must be submitted with each semi-annual report. Roach must test for any TTO appearing on the analyses attached to the BMR or appearing on the MSDS at least twice each year and the analyses must be submitted with each semi-annual report.

Roach may submit a TOMP/SMP which certifies that TTOs can not enter the sewer in significant quantities and testing for TTOs will not be required.

EPA Guidance Manual for Implementing Total Toxic Organics (TTO) Pretreatment Standards is available on the internet. Please contact the Department for instructions on how to access this guidance. This guidance may be helpful if Roach elects to submit a TOMP.

Roach must sample for Cyanide, Cadmium, Chromium, Copper, Lead, Nickel, Silver and Zinc for every semi-annual report submitted to ADEQ. Please be sure methods are indicated on lab reports. In accordance with **§433.12(c)** "*Self-monitoring for cyanide must be conducted after cyanide treatment and before dilution with other streams. Alternatively, samples may be taken of the final effluent, if the plant limitations are adjusted based on the dilution ratio of the cyanide waste stream flow to the effluent flow.*" If Roach does not use cyanide or generate cyanide, Roach may sample for cyanide at the same location for metal sampling.

Pursuant to **§403.12(e)(1)** in each semi-annual report Roach must "*include a record of measured or estimated average and maximum daily flows for the reporting period for the Discharge reported in*" the "final" BMR (Section 4).

As part of the Department's responsibilities in implementing the National Pretreatment Regulations, pursuant to §403.12 (p) the Department is required to notify all Categorical Industries of their obligations under Subtitle C and D of Resource Conservation & Recovery Act of 1976 and the Arkansas Hazardous Waste Management Code. These regulations apply not only to waste that is discharged but also to waste that is hauled or stored. The Hazardous Waste Division may require reporting. For more information contact the Hazardous Waste Chief [(501) 682-0833] at the address below.

In accordance with §403.12(p) Roach "*shall notify the POTW [Trumann Water Department], the EPA Regional Waste Management Division Director, and State hazardous waste authorities in writing of any discharge into the POTW of a substance, which, if otherwise disposed of, would be a hazardous waste under 40 CFR part 261.*"

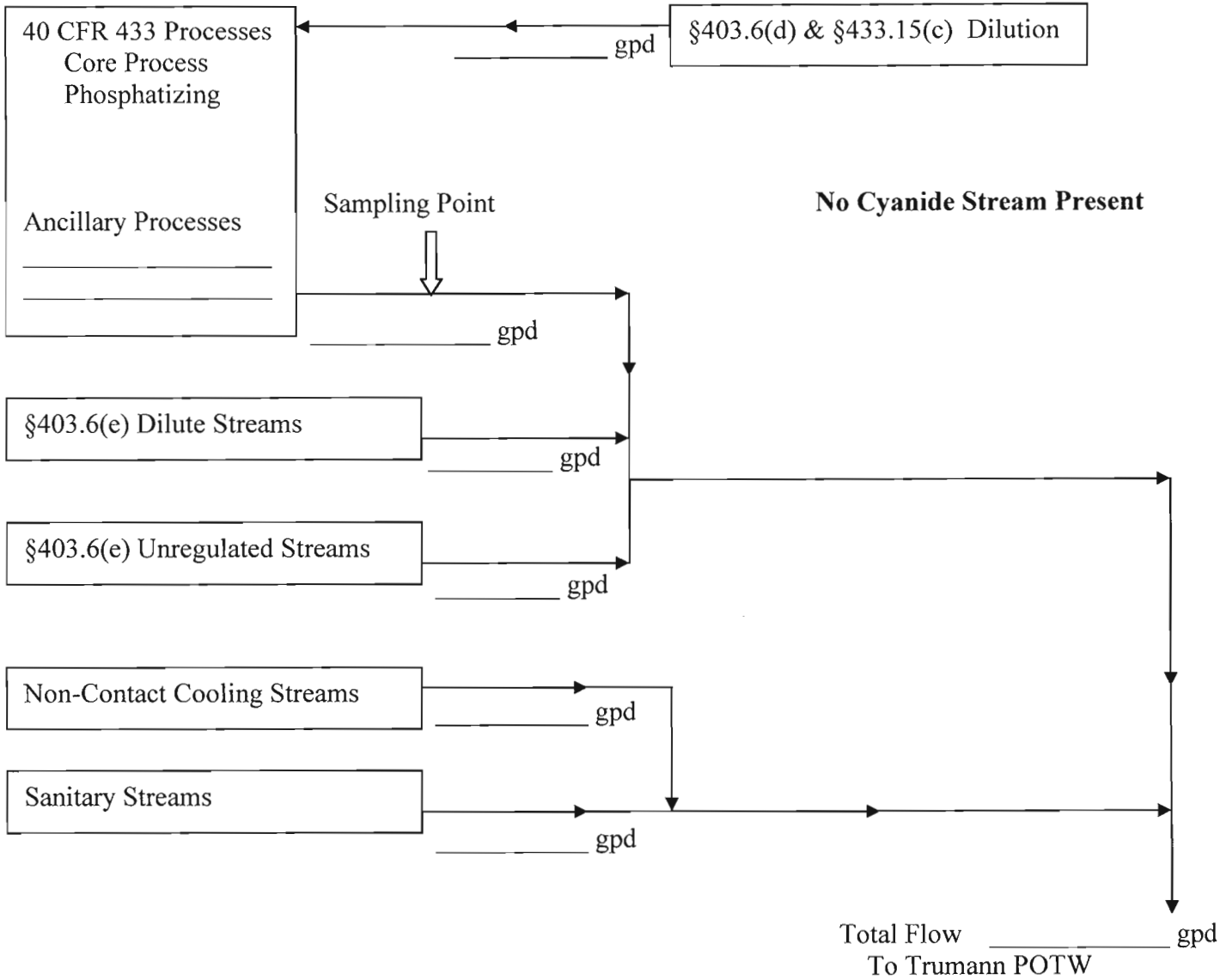
A form [CIU-SAR_FORM433.wpc] is enclosed. Roach may use this form to submit future reports. The form is available electronically. Please contact the Department at torrence@adeq.state.ar.us to receive a copy electronically.

If Roach or an authorized representative has questions or needs more information, please contact the Department at 682-0626 or by email at torrence@adeq.state.ar.us .

Sincerely,

Rufus Torrence
ADEQ Engineer

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
RMC_Diagram.doc (February 12, 2010)

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

B. FACILITY & LOCATION ADDRESS

C. FACILITY CONTACT:

TELEPHONE NUMBER:

e-mail:

(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: TO:

(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

*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.

C. Number of Regular Employees at this Facility

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)			
§403.6(e) Unregulated*			
§403.6(e) Dilute			
Cooling Water			
Sanitary			
Total Flow to POTW			*****

*"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									
Ave Measured									

Sample Location _____

Sample Type (Grab or Composite) _____

Number of Samples and Frequency Collected _____

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.

(Typed Name)

(Corporate Officer or authorized representative)

Date of Signature _____

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:

(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.

NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE

SIGNATURE

OFFICIAL TITLE

DATE SIGNED

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

Parker Hannifin Corp.
Mobile Cylinder Division
20138 Interstate 30
Benton, AR 72019

B. FACILITY & LOCATION ADDRESS

Parker Hannifin Corp.
Mobile Cylinder Division
20138 Interstate 30
Benton, AR 72019

C. FACILITY CONTACT: David Gombrich **TELEPHONE NUMBER:** 501-794-0334 **e-mail:** dgombrich@parker.com

(2) REPORTING PERIOD— FISCAL YEAR From May 1 to April 30 (Both Semi-Annual Reports must cover Fiscal Year)

A. MONTHS WHICH REPORTS ARE DUE

November and May

B. PERIOD COVERED BY THIS REPORT

FROM: November - 08

TO: May - 09

(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

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.

Example Only

C. Number of Regular Employees at this Facility
95

D. [Reserved]

(4) FLOW MEASUREMENT

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

Process	Average	Maximum	Type of Discharge
Regulated (Core & Ancillary)	1700 gal/ 6 wks	1700 gal/ 6 wks	Batch
Regulated (Cyanide)	NA		
' 403.6(e) Unregulated'	NA		
' 403.6(e) Dilute	NA		
Cooling Water	NA		
Sanitary	1545 GPD		
Total Flow to POTW	1700 Gal/6weeks 2145 GPD	1700 Gal/6weeks 2145 GPD	*****

"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

Batch neutralization of phosphoric acid bath and rinse water to acceptable pH levels.

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	<0.004	0.052	0.413	<0.012	0.300	<0.010	2.34	<0.010	<0.208
Ave Measured	<0.004	0.052	0.413	<0.012	0.300	<0.010	2.34	<0.010	<0.208

Sample Location Tank One & Tank Two, at a depth of 12 inches.

Sample Type (Grab or Composite) Grab

Number of Samples and Frequency Collected 1 Volume weighed sample collected in March 09

40CFR136 Preservation and Analytical Methods Use: Yes No

(6) CERTIFICATION

A. [Reserved]

[Reserved]

B. CHECK ONE: G ' 433.11(e) TOXIC ORGANIC ANALYSIS ATTACHED G ' 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.

(Typed Name)

(Corporate Officer or authorized representative)

Date of Signature _____

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 _____

'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:

(8) GENERAL COMMENTS

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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.

David J. Gombrich
NAME OF CORPORATE OFFICER OR AUTHORIZED REPRESENTATIVE


SIGNATURE

Safety Technician
OFFICIAL TITLE

Tuesday, April 14, 2009
DATE SIGNED