

From: [Belcourt, Jamie](#)
To: ["mdavis@RoachConveyors.com"](mailto:mdavis@RoachConveyors.com)
Subject: RE: February 2022 Semiannual Pretreatment Report
Date: Monday, July 11, 2022 12:28:48 PM
Attachments: [image005.png](#)
[image006.png](#)
[image003.png](#)

Hello,

Thank you for your semiannual pretreatment report submission for February 2022. This report was received, reviewed, and deemed complete with the reporting requirements in 40 CFR 403.12(e).

Thank you,

Jamie Belcourt | Pretreatment Coordinator

Division of Environmental Quality | Office of Water Quality

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us



From: mdavis@RoachConveyors.com [mailto:mdavis@RoachConveyors.com]
Sent: Friday, July 8, 2022 11:13 AM
To: Belcourt, Jamie
Subject: RE: February 2022 Semiannual Pretreatment Report
Please see attached:

Thank You,



Matthew Merritt Davis

(870) 483 7631 Ext: 1731

Cell: (870) 227 1361

NOTE: This e-mail transmission, including any attachments, is intended only for the named recipient(s) and may contain information that is privileged, confidential and/or exempt from disclosure under applicable law. If you have received this transmission in error, or are not the named recipient(s), please notify immediately by return e-mail and permanently delete this transmission, including any attachments.

From: Belcourt, Jamie

Sent: Thursday, July 7, 2022 11:04 AM

To: 'mdavis@roachconveyors.com'

Subject: February 2022 Semiannual Pretreatment Report

Hello,

Please submit Roach Manufacturing's semiannual pretreatment report for February 2022 for

the reporting period of August 1, 2021 through February 1, 2022. The last report on record for this facility is for the reporting period of February 1, 2021 through July 31, 2021.

Thank you,

Jamie Belcourt | Pretreatment Coordinator

Division of Environmental Quality | Office of Water Quality

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0858 | e: jamie.belcourt@adeq.state.ar.us





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

www.roachconveyors.com

March 8, 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 August 1, 2021, through January 31, 2022, which includes the lab test results from March 4, 2021.

Sincerely,

ROACH MANUFACTURING CORPORATION

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

Merritt Davis

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: August 1, 2021 TO: January 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
308

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)	2,556	10,000	5 days per week
' 403.6(e) Unregulated*			
' 403.6(e) Dilute			
Cooling Water			
Sanitary	11,645	6,000	Continuous
Total Flow to POTW	14,201	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 _____

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	<0.0001	<0.001	0.0157	<0.0005	0.00535	<0.001	0.0285	<0.005	<0.02
Ave Measured	<0.0001	<0.001	0.0157	<0.0005	0.00531	<0.001	0.0280	<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

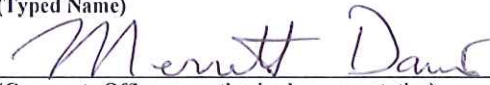
A. [Reserved]

[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 3/8/2022

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(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

3/8/2022
DATE SIGNED

3/7/2022

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

Ref: Analytical Testing
Lab Report Number: 22-059-0048
Client Project Description: Semi-Annual

Dear Ms. Sherri Tribble:

Waypoint Analytical, LLC. received sample(s) on 2/28/2022 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	06/30/2022
Florida	State Program - NELAP	E871157	06/30/2022
Georgia	State Program	C044	02/18/2023
Georgia	State Program	04015	06/30/2022
Illinois	State Program - NELAP	200078	10/10/2022
Kentucky	State Program	80215	06/30/2022
Kentucky	State Program	KY90047	12/31/2022
Louisiana	State Program - NELAP	LA037	12/31/2022
Louisiana	State Program - NELAP	04015	06/30/2022
Mississippi	State Program	MS	02/11/2023
North Carolina	State Program	415	12/31/2022
Pennsylvania	State Program - NELAP	68-03195	05/31/2022
South Carolina	State Program	84002	06/30/2022
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	06/30/2022
Virginia	State Program - NELAP	460181	09/14/2022

Sample Summary Table

Report Number: 22-059-0048

Client Project Description: Semi-Annual

Lab No	Client Sample ID	Matrix	Date Collected	Date Received
95008	Stage 4 Continuous Rinse	Aqueous	02/28/2022 08:51	02/28/2022
95009	Stage 1,2,3,4	Aqueous	02/28/2022 09:05	02/28/2022



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 Semi-Annual
 Information :

Report Date : 03/07/2022
 Received : 02/28/2022

Randell H. Thomas

Report Number : **22-059-0048**

REPORT OF ANALYSIS

Randy Thomas
 Project Manager

Lab No : **95008**
 Sample ID : **Stage 4 Continuous Rinse**

Matrix: **Aqueous**
 Sampled: **2/28/2022 8:51**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	03/04/22 11:02	FMM	4500CNE-2011
Cadmium	<0.100	µg/L	0.100	1	03/04/22 16:30	BKN	EPA-200.8
Chromium	<1.00	µg/L	1.00	1	03/04/22 16:30	BKN	EPA-200.8
Copper	15.7	µg/L	0.500	1	03/04/22 16:30	BKN	EPA-200.8
Lead	<0.500	µg/L	0.500	1	03/04/22 16:30	BKN	EPA-200.8
Nickel	5.35	µg/L	0.500	1	03/04/22 16:30	BKN	EPA-200.8
Silver	<0.100	µg/L	0.100	1	03/04/22 16:30	BKN	EPA-200.8
Zinc	28.0	µg/L	20.0	1	03/04/22 16:30	BKN	EPA-200.8

Qualifiers/ Definitions DF Dilution Factor MQL Method Quantitation Limit



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 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 Semi-Annual
 Information :

Report Date : 03/07/2022
 Received : 02/28/2022

Randy H. Thomas

Report Number : 22-059-0048

REPORT OF ANALYSIS

Randy Thomas
 Project Manager

Lab No : 95009
 Sample ID : Stage 1,2,3,4

Matrix: Aqueous
 Sampled: 2/28/2022 9:05

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	03/04/22 11:02	FMM	4500CNE-2011
Cadmium	<0.100	µg/L	0.100	1	03/04/22 16:35	BKN	EPA-200.8
Chromium	<1.00	µg/L	1.00	1	03/04/22 16:35	BKN	EPA-200.8
Copper	15.7	µg/L	0.500	1	03/04/22 16:35	BKN	EPA-200.8
Lead	<0.500	µg/L	0.500	1	03/04/22 16:35	BKN	EPA-200.8
Nickel	5.31	µg/L	0.500	1	03/04/22 16:35	BKN	EPA-200.8
Silver	<0.100	µg/L	0.100	1	03/04/22 16:35	BKN	EPA-200.8
Zinc	28.5	µg/L	20.0	1	03/04/22 16:35	BKN	EPA-200.8

Qualifiers/ Definitions DF Dilution Factor MQL Method Quantitation Limit

Shipment Receipt Form

Customer Number: **07154**
Customer Name: **Roach Conveyors**
Report Number: **22-059-0048**

Shipping Method

Fed Ex US Postal Lab Other :
 UPS Client Courier Thermometer ID: T102

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:	177699
Initiated By:	Mick Parrish
Initiated Date:	2/23/2022
Project Comment	

CHAIN-OF-CUSTODY



Roach Conveyors
Semi-Annual

22-059-0048
07154
02-28-2022
11:36:55

Company Name Roach Conveyors	Company Number 07154	Client Project Manager/Contact Mr. Merritt Davis	Purchase Order Number
Site Name Semi-Annual	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 checked="" 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
2-28-22	8:51	STAGE 4 Continuous Rinse	Aqueous		1	Plastic - Pint	NaOH - Sodium Hydroxide	CN
2-28-22	8:58	STAGE 4 Continuous Rinse	Aqueous		1	Plastic - Pint	HNO3 - Nitric Acid	Cd, Cr, Cu, Pb, Ni, Ag, Zn
2-28-22	9:05	Stage 1, 2, 3, 4	Aqueous		1	Plastic - Pint	NaOH - Sodium Hydroxide	CN
2-28-22	9:11	Stage 1, 2, 3, 4	Aqueous		1	Plastic - Pint	HNO3 - Nitric Acid	Cd, Cr, Cu, Pb, Ni, Ag, Zn

For Laboratory Use Only			Sampled by (Name - Print)		Client Remarks/Comments			
Ice	Custody Seals	Lab Comments	Merritt Davis					
Y/N	Y/N		Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time		
			<i>[Signature]</i>	2-28-22 10:00	<i>[Signature]</i>	2-28-22 10:00		
			Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time		
			<i>[Signature]</i>	2-28-22 11:08	<i>[Signature]</i>			
Blank/Cooler Temp			Relinquished by: (SIGNATURE)	Date Time	Received by: (SIGNATURE)	Date Time		
117102 Allw			<i>[Signature]</i>		<i>[Signature]</i>	1108 02/28/2022		