

Gage, Hannah

From: Gilliam, Allen
Sent: Friday, March 18, 2016 3:28 PM
To: 'mdavis@roachconveyors.com'
Cc: 'sribble@roachconveyors.com'; Gage, Hannah; 'scottytw@centurytel.net'
Subject: AR0035602_Roach Mfg ARP001060 Feb 2016 semi annual Pretreatment report_20160318
Attachments: Roachs 2016 semi annual Pretreatment report.pdf

Merritt,

Roach's February 2016 semi-annual Pretreatment report was received, reviewed, deemed complete and compliant with the reporting requirements in 40 CFR 403.12(e) and more specifically in compliance with the Metal Finishing Pretreatment standards in 40 CFR 433.17.

No further actions are deemed necessary at this time.

Sincerely,

Allen Gilliam
ADEQ State Pretreatment Coordinator
501.682.0625

ec: Scotty Jones, Trumann Water & Wastewater Manager

E/NPDES/NPDES/Pretreatment/Reports

A 2995P



808 HWY 463 Trumann, AR 72472 Tel 870-483-7631 Fax 870-483-0222
www.roachconveyors.com

February 23, 2016

Mr. Allen Gilliam
Pretreatment Coordinator
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock AR 72118-5317

AG
RECEIVED
FEB 26 2016
15762 TW

Ref: Semi-Annual Report

Dear Mr. Gilliam:

Enclosed please find our semi-annual report for August 1, 2015, through January 31, 2016, which includes the lab test results from September 11, 2015.

Sincerely,

ROACH MANUFACTURING CORPORATION

A handwritten signature in cursive script, appearing to read "Merritt Davis", written in black ink.

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: August 1, 2015 TO: January 31, 2016

(3) DESCRIPTION OF OPERATION

A. REGULATED PROCESSES

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

*SEE 40CFR433.10(a) FOR 40 DIFFERENT OPERATIONS

C. Number of Regular Employees at this Facility
208

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)	2.706	10,000	5 days per week
Regulated (Cyanide)			
'403.6(e) Unregulated*			
'403.6(e) Dilute			
Cooling Water			
Sanitary	4.394	6,000	Continuous
Total Flow to POTW	7.100	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	0.00355	0.00494	0.103	0.00051	0.539	0.0005	0.169	0.04	<0.02
Ave Measured	<0.0005	0.00064	0.0218	<0.0005	0.0134	<0.0005	0.0175	<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 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 2/23/2016

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(f)]

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

2/23/2016
DATE SIGNED



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

9/22/2015

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

Ref: Analytical Testing
Lab Report Number: 15-254-0290
Client Project Description: Analytical Testing

Dear Ms. Sherri Tribble:
Waypoint Analytical, Inc. received sample(s) on 9/11/2015 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 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.

Alabama #40750	Louisiana #04015	VA NELAP #460181	Texas #T104704180-11-6	Arkansas #88-0650
Mississippi	California #2904	NC #415	Oklahoma #9311	Virginia #00106
Kentucky #90047	Tennessee #TN02027	EPA #TN00012	Kentucky UST #41	Kansas #E-10396





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 www.waypointanalytical.com

07154
 Roach Conveyors
 Ms. Sherri Tribble
 808 Highway 463 North
 Truman , AR 72472

Project Analytical Testing
 Information :

Report Date : 09/22/2015
 Received : 9/11/2015

Randell H. Thomas

Randy Thomas
 Project Manager

Report Number : **15-254-0290**

REPORT OF ANALYSIS

Lab No : **89935**
 Sample ID : **Stage 4 Cont. Rinse**

Matrix: **Aqueous**
 Sampled: **9/11/2015 12:45**

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	<0.005	mg/L	0.005	1	09/15/15 11:20	EWB	4500CNE-2011
Total Cadmium	<0.500	µg/L	0.500	1	09/18/15 01:51	CGC	EPA-200.8
Total Chromium	0.646	µg/L	0.500	1	09/18/15 01:51	CGC	EPA-200.8
Total Copper	21.8	µg/L	0.500	1	09/18/15 01:51	CGC	EPA-200.8
Total Lead	<0.500	µg/L	0.500	1	09/18/15 01:51	CGC	EPA-200.8
Total Nickel	13.4	µg/L	0.500	1	09/18/15 01:51	CGC	EPA-200.8
Total Silver	<0.500	µg/L	0.500	1	09/18/15 01:51	CGC	EPA-200.8
Total Zinc	17.5	µg/L	5.00	1	09/18/15 01:51	CGC	EPA-200.8

**Qualifiers/
 Definitions**

DF Dilution Factor

MQL Method Quantitation Limit



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 www.waypointanalytical.com

07154
 Roach Conveyors
 Ms. Sherri Tribble
 808 Highway 463 North
 Truman , AR 72472

Project Analytical Testing
 Information :

Report Date : 09/22/2015
 Received : 9/11/2015

Randell H. Thomas

Report Number : 15-254-0290

REPORT OF ANALYSIS

Randy Thomas
 Project Manager

Lab No : 89936
 Sample ID : Stage 1, 2, 3, & 4

Matrix: Aqueous
 Sampled: 9/11/2015 12:35

Test	Results	Units	MQL	DF	Date / Time Analyzed	By	Analytical Method
Cyanide, Total	0.040	mg/L	0.005	1	09/15/15 11:20	EWB	4500CNE-2011
Total Cadmium	3.55	µg/L	0.500	1	09/18/15 02:09	CGC	EPA-200.8
Total Chromium	4.94	µg/L	0.500	1	09/18/15 02:09	CGC	EPA-200.8
Total Copper	103	µg/L	5.00	10	09/20/15 21:54	CGC	EPA-200.8
Total Lead	0.514	µg/L	0.500	1	09/18/15 02:09	CGC	EPA-200.8
Total Nickel	539	µg/L	50.0	100	09/20/15 22:00	CGC	EPA-200.8
Total Silver	<0.500	µg/L	0.500	1	09/18/15 02:09	CGC	EPA-200.8
Total Zinc	169	µg/L	50.0	10	09/20/15 21:54	CGC	EPA-200.8

**Qualifiers/
 Definitions**

DF Dilution Factor

MQL Method Quantitation Limit

Cooler Receipt Form

Customer Number: **07154**
 Customer Name: **Roach Conveyors**
 Report Number: **15-254-0290**

Shipping Method

Fed Ex US Postal Lab Other : _____
 UPS Client Courier Thermometer ID: #6

Shipping container/cooler uncompromised?	<input checked="" type="radio"/> Yes	<input type="radio"/> No	
Number of coolers 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 Required
Custody seals intact on sample bottles?	<input type="radio"/> Yes	<input type="radio"/> No	<input checked="" type="radio"/> Not Required
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:

Any regulatory non-compliance issues will be recorded on non-compliance report.

Signature: Date & Time:

Environmental Testing & Consulting, Inc. Chain of Custody Page 1 of 1

Client Name Roach Mtg. Corp	Client Project Manager/Contact Rick Clift Sherri Tribble	Phone # 870-215-2676 870-483-7631
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15-254-0290
07154
09-11-2015
14:35:21

Roach Conveyors
Analytical Testing

(1)

Project/ Site Location Trumann, AR	email Address rclift@astate.edu
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Project Number -	FID # -	Purchase Order Number -
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Type of Event Single Daily Weekly Monthly Quarterly <u>Semi-Annual</u>	Method of Shipment Personal Delivery
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NPDES
 Wastewater
 UST
 Other Program

RUSH - Additional charges apply.
The following require a Statement of Work:
 Special Report Requirements
 Special Detection Limit(s)
 Special Method Requirements

Environmental Testing & Consulting, Inc.
2790 Whitten Road
Memphis, TN 38133
(901) 213-2400 (phone)
(901) 213-2440 (fax)
www.etcmemphis.com



Date	Time	Sample Identification	Number of Containers	Matrix	(G)rab or (C)omposite	Required Analysis:															
						Metals: Cd, Cr, Cu, Pb, Ni, Ag, Zn	Total Cyanide														
9/11/15	12:45p	Stage 4 Cont. Rinse	2	WW	C	X	X														
9/11/15	12:35p	Stages 1, 2, 3 & 4	2	WW	C	X	X														

Matrix
 WW - Wastewater
 GW - Groundwater
 DW - Drinking Water
 S - Soil
 O - Oil
 L - Non aqueous liquid
 Other _____

Sampled by (Name/Title): (Print):
 Ervin Clark - Roach
 R. Clift - Consultant

Client Remarks/Comments

For Laboratory Use Only

Ice: Y
Cooler Temp: 5.1°C
Lab Comments: TC (C)

Relinquished by: (SIGNATURE)
Rick Clift

Relinquished by: (SIGNATURE)

Relinquished by: (SIGNATURE)

Date Time	Received by: (SIGNATURE)	Date Time
9/11/15 2:05p		
Date Time	Received by: (SIGNATURE)	Date Time
Date Time	Received for lab by: (SIGNATURE)	Date Time
	<u>Q Smith</u>	9-11-15 14:05