



September 2, 2010

Jeff Cook, Environmental and Fleet Safety Manager  
George's, Inc.  
P.O. Drawer 2030  
Springdale, AR 72765-2030

RE: George's Processing Plant, 1306 N. Kansas, Springdale, AR

AFIN: 72-00926      NPDES Permit No.: ARR00B427

Dear Mr. Cook:

On July 30, 2010, I performed a reconnaissance inspection of the industrial stormwater facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This reconnaissance inspection was conducted in conjunction with an emergency response incident that resulted in approximately 14 pounds of Astec 2000 Roof Coating being improperly disposed in a storm drain at George's Processing Plant. This inspection revealed the following violation:

- Unpermitted discharge of Astec 2000 Roof Coating caused pollution to the waters of the State. This is in violation of the Arkansas Water and Air Pollution Control Act, Ark. Code Ann. §8-4-217(a)(1). Per my conversation with Mr. Greg Knight, Corporate Safety Manager, Black Jack Roofing improperly disposed Astec 2000 Roof Coating into a storm drain located on the northwest side of the George's Processing Plant. This waste entered into Spring Creek on the northeast portion of the property.

The above item requires your immediate attention. Please submit a written response to this finding to Cindy Garner, Water Division Enforcement Branch Manager. This response should be mailed to the address below. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all of the necessary documentation (i.e. photographs, receipts of disposal) is due by September 12, 2010.

For additional information you may contact the enforcement section by telephone at 501-682-0639 or by fax at 501-682-0910.

Mr. Cook, George's Processing Plant  
September 2, 2010  
Page 2

If I can be of any assistance, please contact me at 479-267-0811, ext. 12(west@adeq.state.ar.us).

Sincerely,

A handwritten signature in black ink that reads "Jay Alison West". The signature is written in a cursive, flowing style.

Alison West  
District 1 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

# NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003

## Section A: National Data System Coding

Transaction Code			NPDES								Yr/Mo/Day					Inspec. Type		Inspector		Fac. Type								
1	N	2	5	3	A	R	R	0	0	B	4	2	7	11	12	1	0	0	7	3	0	17	18	R	19	S	20	2
Remarks																												
<div> <div>Inspection Work Days</div> <div>67</div> <div>69</div> </div> <div> <div>Facility Evaluation Rating</div> <div>70</div> <div>N</div> </div> <div> <div>BI</div> <div>71</div> <div>N</div> </div> <div> <div>QA</div> <div>72</div> <div>N</div> </div> <div> <div>Reserved</div> <div>73</div> <div>74</div> <div>75</div> <div>80</div> </div>																												

## Section B: Facility Data

Name and Location of Facility Inspected ( <i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i> ) <b>George's, Inc.</b> <b>1306 N. Kansas</b> <b>Springdale, AR 72764</b>		Entry Time/Date <b>1:30 p.m./7-30-2010</b>	Permit Effective Date <b>4/1/2004</b>
		Exit Time/Date <b>2:45 p.m./7-30-2010</b>	Permit Expiration Date <b>10/30/2010</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Jeff Cook/Environmental and Fleet Safety Manager/479-927-7125/888-634-4816</b> <b>Greg Knight/Corporate Safety Manager/479-927-7125/888-634-4816</b> <b>Troy Green/Plant Manager</b> <b>Bud Kirk/Wastewater Manager</b>			Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Jeff Cook/Environmental and Fleet Safety Manager/479-927-7125/888-634-4816</b> <b>George's, Inc.</b> <b>P.O. Drawer 2030</b> <b>Springdale, AR 72765</b>		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

## Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- Unpermitted discharges of Astec 2000 Roof Coating caused pollution to the waters of the State.

Name(s) and Signature(s) of Inspector(s) Alison West	Agency/Office/Telephone/Fax <b>AR Dept. of Environmental Quality-Fayetteville</b> <b>479-267-0811, Ext. 12/479-267-0819</b>	Date <b>August 31, 2010</b>

ADEQ Water NPDES Inspection	AFIN: <b>72-00926</b>	Permit #: <b>ARR00B427</b>
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Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date
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ADEQ Water NPDES Inspection	AFIN: <b>72-00926</b>	Permit #: <b>ARR00B427</b>
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Water Division Photographic Evidence Sheet									
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<b>Location:</b>	George's Processing Plant-1306 N. Backus, Springdale, AR								
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<b>Photographer:</b>	Alison West				<b>Witness:</b>	NA			
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<b>Photo #</b>	1	<b>Of</b>	10	<b>Date:</b>	7-30-2010	<b>Time:</b>	2:37 p.m.		
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<b>Description:</b>	IMGP5214. Astec Finish Coat 2000 5 gallon bucket.								
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<b>Photographer:</b>	Alison West				<b>Witness:</b>	NA			
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<b>Photo #</b>	2	<b>Of</b>	10	<b>Date:</b>	7-30-2010	<b>Time:</b>	2:33 p.m.		
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<b>Description:</b>	IMGP5213. Storm drain where residue from Astec Finish Coat 2000 was improperly disposed at the plant.								
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Water Division Photographic Evidence Sheet									
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<b>Location:</b>	George's Processing Plant-1306 N. Backus, Springdale, AR								
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<b>Photographer:</b>	Alison West				<b>Witness:</b>	NA			
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<b>Photo #</b>	3	<b>Of</b>	10	<b>Date:</b>	7-30-2010	<b>Time:</b>	1:38 p.m.		
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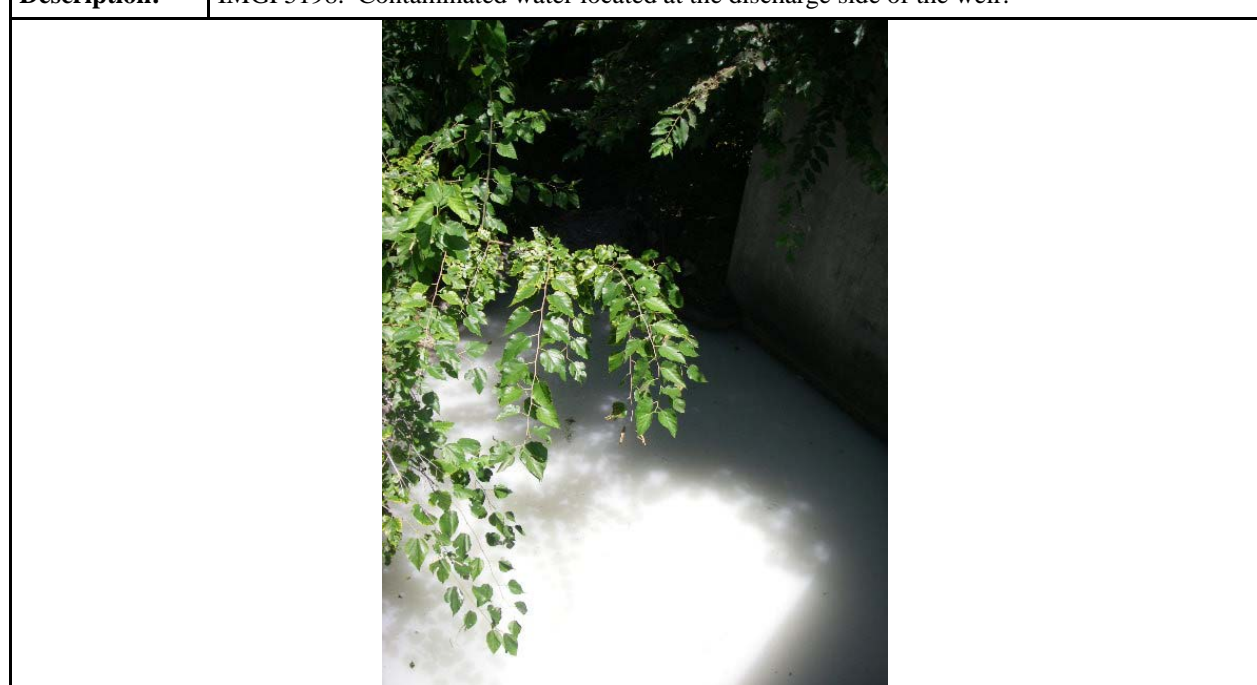
<b>Description:</b>	IMGP5196. Contaminated water located in concrete weir located northeast of the facility.								
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<b>Photographer:</b>	Alison West				<b>Witness:</b>	NA			
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<b>Photo #</b>	4	<b>Of</b>	10	<b>Date:</b>	7-30-2010	<b>Time:</b>	1:39 p.m.		
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<b>Description:</b>	IMGP5198. Contaminated water located at the discharge side of the weir.								
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Water Division Photographic Evidence Sheet							
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<b>Location:</b>	George's Processing Plant-1306 N. Backus, Springdale, AR						
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<b>Photographer:</b>	Alison West			<b>Witness:</b>	NA		
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<b>Photo #</b>	5	<b>Of</b>	10	<b>Date:</b>	7-30-2010	<b>Time:</b>	2:19 p.m.
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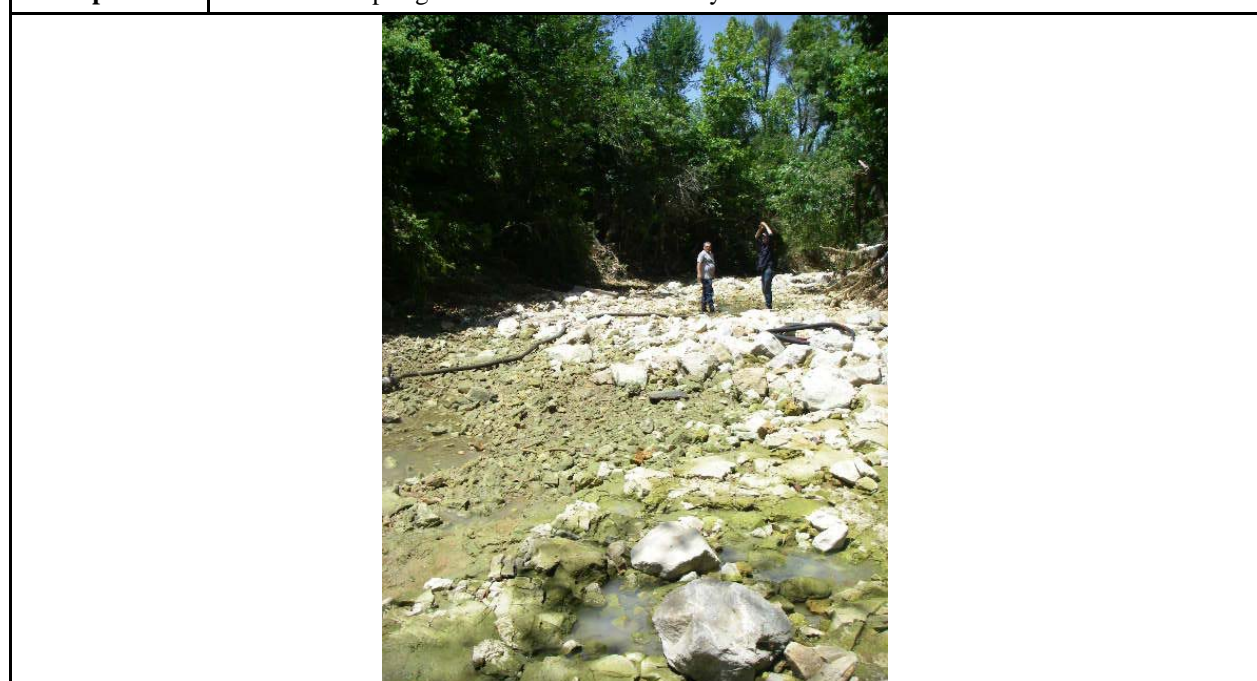
<b>Description:</b>	IMGP5209. Concrete structure across Spring Creek south of the release.						
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<b>Photographer:</b>	Alison West			<b>Witness:</b>	John Fazio		
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<b>Photo #</b>	6	<b>Of</b>	10	<b>Date:</b>	7-30-2010	<b>Time:</b>	1:41 p.m.
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<b>Description:</b>	IMGP5199. Spring Creek located immediately north of the concrete structure.						
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Water Division Photographic Evidence Sheet									
<b>Location:</b>		George's Processing Plant-1306 N. Backus, Springdale, AR							
<b>Photographer:</b>		Alison West				<b>Witness:</b>		NA	
<b>Photo #</b>	7	<b>Of</b>	10		<b>Date:</b>	7-30-2010	<b>Time:</b>	1:42 p.m.	
<b>Description:</b>		IMGP5200. Contaminated water from Spring Creek being vacuumed.							
									
<b>Photographer:</b>		Alison West				<b>Witness:</b>		NA	
<b>Photo #</b>	8	<b>Of</b>	10		<b>Date:</b>	7-30-2010	<b>Time:</b>	1:46 p.m.	
<b>Description:</b>		IMGP5205. Milky colored water from the spill that needed to be removed from Spring Creek.							
									

Water Division Photographic Evidence Sheet							
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<b>Location:</b>	George's Processing Plant-1306 N. Backus, Springdale, AR						
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<b>Photographer:</b>	Alison West			<b>Witness:</b>	NA		
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<b>Photo #</b>	9	<b>Of</b>	10	<b>Date:</b>	7-30-2010	<b>Time:</b>	2:18 p.m.
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<b>Description:</b>	IMGP5208. Close-up of milky colored water in Spring Creek from IMGP5205.						
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<b>Photographer:</b>	Alison West			<b>Witness:</b>	NA		
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<b>Photo #</b>	10	<b>Of</b>	10	<b>Date:</b>	7-30-2010	<b>Time:</b>	2:23 p.m.
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<b>Description:</b>	IMGP5212. Terra Renewal Service truck used to store contaminated water from Spring Creek.						
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# GEORGE'S<sup>®</sup>

## I N C.

September 7, 2010

Arkansas Department of Environmental Quality  
Water Division (ATTN: Cindy Garner)  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

**RE: NPDES Compliance Inspection Report (attached).**

Dear Ms. Garner,

Regarding a letter from Allison West dated September 2, 2010 concerning an unintentional release of a small quantity of Astec 2000 roof coating at George's Processing, Inc. at 1306 Kansas Street, I am providing the following synopsis of events based on our investigation, findings and, remedial action.

On July 30 at about 8:00 a.m. our Wastewater Manager, Bud Kirk noticed residue near a storm drain at our chemical dock. He was suspicious that some unwanted material may have entered the drain so he checked the weir behind the plant. He discovered that a white tinted material had entered the weir and overflowed into Spring Creek. He immediately contacted Jeff Cook, Greg Knight, and the roofing contractor suspected of dumping the material into the drain.

The contractor provided MSDS for the material at about 8:07 a.m. It contained a small amount of material that could be harmful to aquatic life.

The material had tinted the water in the creek a milky white color. The creek was not flowing at the time so the spill was contained to an area approximately 100 yards long bordered on the North (downstream) by a rock shoal and the South (upstream) by a rock concrete wall.

We made the decision to pump the contaminated water from the creek and began that operation at approximately 8:40 a.m. using on site tankers and equipment. Recognizing that we did not have enough storage capacity, we also contacted TRS (a waste disposal company) and hired an additional tanker to hold the water.

Greg Knight performed calculations to determine if a reportable quantity of material had been released. It had not. The threshold for the material was 1000 pounds and approximately 14 pounds was calculated to have been released. This determination was made that the amount of Astec 2000 in the creek was the residue of 18, 5 gallon buckets containing .783 pounds of residue per bucket (determined by scraping 20 other buckets and weighing the contents and dividing by the number of buckets). According to this model, the amount of potentially

hazardous chemical was 14.09 pounds based on a product weight of 13.5 pounds per gallon and active ingredient of 1 – 5 %.

At about 9:45 a.m. we contacted the ADEQ Water Division office in Fayetteville (Allison West) to let her know that we had an incident and were in the process of cleaning it up. She arrived on the scene at about 1:30 PM. She dutifully informed us that any milky water was to be removed from the creek, weir, and the drains, and that we would have to dispose of it in an approved manner.

We finished removing all of the contaminated water in the creek at about 4:00 p.m. The weir was not completely emptied, but did not release any additional material into the creek. We obtained approval to dispose of the material through the roofing company from Waste Management on Wednesday, August 4, 2010. Two loads were disposed of at Two Pine Landfill at North Little Rock (Waste Manifests attached). While the first load was being transported to the landfill, the second tanker was used to clean the remaining contaminated water from the weir and drains completing the second load of material taken to the landfill on Friday, August 6, 2010.

During and after remediation Jeff Cook inspected the creek to ensure that no contaminated material was left behind and also noted that no injured, distressed or dead fish, crustaceans, or insects were discovered. Various forms of aquatic life including minnows, crayfish, and insects were present and active. After remediation the creek was slowly refilling from the upstream end and was running clear with no apparent adverse effects.

We would like to stress that while the material entered the creek from our property, the roofing contractor was responsible for the spill. George's acted primarily as the source of the remediation effort. We have fully equipped, trained, and qualified HAZMAT teams at all of our major facilities and the capability and expertise to handle a wide range of emergencies. The contractor, Black Jack Roofing, may be able to provide other information and documentation you may need. If I can be of further assistance, please don't hesitate to contact me.



Jeff Cook  
Environmental and Fleet Safety Manager  
479-927-7125 office  
479-530-7611 cell  
479-927-7119 facsimile

4 Enclosures:  
Site Photographs  
Astec 2000 MSDS  
Waste Manifest (2)  
Original letter (ADEQ – Allison West)





Weir overflowed sometime overnight 7-30-10.



View of a portion of the creek with residue present.





About 100yards of creek was affected by the release. The tinting of the water is due to the non-toxic pigment in the roofing paint.



The creek downstream beyond the rock berm was not affected.





A worker is removing tainted water.



One of two tankers used to collect and store water.





A view of the creek after clean up.



Post cleanup. Aquatic life was present and active.

# MATERIAL SAFETY DATA SHEET

## SECTION 1 - PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: ASTEC 2000 FINISH COAT

PART NUMBER:

GENERAL USE: Protective coating

PRODUCT DESCRIPTION: White viscous liquid, characteristic odor



MANUFACTURER'S NAME

Insulating Coatings Corporation

DATE PREPARED: March 9, 2009

SUPERSEDES: April 1, 2008

Page 1 of 4

ADDRESS (NUMBER, STREET, P.O. BOX)

956 South Hwy 41

TELEPHONE NUMBER FOR INFORMATION

(800) 345-5306

(CITY, STATE AND ZIP CODE)

Inverness, FL 34450

COUNTRY

USA

EMERGENCY TELEPHONE NUMBER

ChemTel Inc. 1- (800) 255-3924 Intl. + 01 (813) 248-0585

## SECTION 2 - HAZARDS IDENTIFICATION

### EMERGENCY OVERVIEW

May be harmful in contact with skin, contact with eyes may cause irritation, prolonged contact with skin may cause irritation. Very toxic to aquatic organisms. Hazard Symbols for this product - Xn, Risk Phrases - R 21, 36, 50/53

### POTENTIAL HEALTH EFFECTS

INHALATION: High concentrations are irritating to the respiratory tract; may cause headache, dizziness, nausea, vomiting and malaise.

SKIN: Brief contact may cause slight irritation; prolonged contact may cause moderate reddening, swelling and possible necrosis.

EYES: Contact causes severe irritation and pain associated with redness and swelling of the conjunctiva.

INGESTION: Moderately toxic; may cause headache, dizziness, diarrhea and general weakness; large doses may result in red blood cell hemolysis.

CARCINOGENICITY

NTP?

Yes

IARC MONOGRAPHS?

No

OSHA REGULATED?

No

Butyl Benzyl Phthalate - IARC Group 3- Cannot be classified as to Carcinogenicity to humans; NTP: Clear evidence

## SECTION 3 - HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENTS

%

(by weight)

CAS #

EINECS #

Hazard  
Symbol

RISK PHRASES

Full Text Section 16

Butyl benzyl phthalate (a,b,c)

1 - 5

85-68-7

201-622-7

T, N

R-50/53, 61, 62

Ethylene glycol monopropyl ether (a)

1 - 5

2807-30-9

220-548-6

Xn

R-10, 21, 36

The remaining components of this product are non-hazardous or are in small enough quantities as to not meet regulatory thresholds for disclosure. These components contain no substances or impurities which would influence the classification of this product.

(a,b) See Section 15

(c) Product is listed or defined as a marine pollutant in IMDG Code or 49 CFR 172.101 Appendix B, List of Marine Pollutants and must be classified as an Environmentally Hazardous Substance, Class 9, in addition to any other defined hazards for this product.

<b>MATERIAL SAFETY DATA SHEET</b>							
PRODUCT NAME: ASTEC 2000 FINISH COAT March 9, 2009						Page 2 of 4	
<b>SECTION 4 - FIRST AID MEASURES</b>							
INHALATION: Remove affected person to fresh air; provide oxygen if breathing is difficult; if affected person is not breathing, administer CPR and seek emergency medical attention.							
SKIN: Remove contaminated clothing; wash affected area with soap and water; launder contaminated clothing before reuse; if irritation persists, seek medical attention.							
EYES: Check for and remove contact lenses. Flush eyes with clear running water for 15 minutes while holding eyelids open; if irritation persists, seek medical attention.							
INGESTION: Give two glasses of water for dilution; Induce vomiting by sticking fingers down throat; never give anything by mouth to an unconscious person; seek medical attention.							
<b>SECTION 5 - FIRE FIGHTING MEASURES</b>							
GENERAL HAZARDS: Product is not considered flammable or combustible. Products of combustion include compounds of carbon, hydrogen and oxygen, including carbon monoxide.							
EXTINGUISHING MEDIA Carbon dioxide, water, water fog, dry chemical, chemical foam.							
FIRE FIGHTING PROCEDURES Keep containers cool with water spray to prevent container rupture due to steam buildup; floor will become slippery if material is released.							
UNUSUAL FIRE AND EXPLOSION HAZARDS None							
HAZARDOUS COMBUSTION PRODUCTS Smoke, fumes or vapors, oxides of carbon.							
<b>SECTION 6 - ACCIDENTAL RELEASE MEASURES</b>							
STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Confine spill, soak up with approved absorbent, shovel product into approved container; for spills in excess of allowable quantities (RQ) notify the National Response Center (800) 424 - 8802; refer to SARA Title III, Section 313 40 CFR 372, and CERCLA 40 CFR 302 for complete regulations concerning reporting requirements.							
<b>SECTION 7 - HANDLING AND STORAGE</b>							
PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Keep container closed when not in use; protect containers from abuse; protect from extreme temperatures. Keep this and other chemicals out of reach of children.							
<b>SECTION 8 - EXPOSURE CONTROLS / PERSONAL PROTECTION</b>							
HAZARDOUS COMPONENTS		NIOSH				ACGIH	
		TWA ppm	TWA mg/m3	STEL ppm	STEL mg/m3	TWA ppm	TWA mg/m3
Butyl benzyl phthalate (a,b,c)		5*				5*	
Ethylene glycol monopropyl ether (a)		Not established				Not established	
(*) The ACGIH Time Weighted Average (TWA) has not been established nor has NIOSH established the Permissible Exposure Limit (PEL) for this product, therefore the limits described have been established as guidelines by the manufacturer.							
<b>PERSONAL PROTECTION:</b>							
RESPIRATORY PROTECTION: None required while threshold limits are kept below maximum allowable concentrations; if TWA exceeds limits, NIOSH approved respirator must be worn. Refer to 29 CFR 1910.134, ANSI Z88.2, or European Standard EN 149 for complete regulations.							
PROTECTIVE GLOVES: Neoprene, butyl or nitrile rubber gloves with cuffs.							
EYE PROTECTION: Chemical splash goggles. Refer to 29 CFR 1910.133, ANSI Z87.1, or European Standard EN166.							
OTHER PROTECTIVE CLOTHING OR EQUIPMENT: Coveralls, apron, or other equipment should be worn to minimize skin contact, safety eyewash station nearby.							
WORK / HYGIENIC PRACTICES: Practice safe workplace habits. Minimize body contact with this, as well as all chemicals in general.							



**MATERIAL SAFETY DATA SHEET**PRODUCT NAME: ASTEC 2000 FINISH COAT  
March 9, 2009

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**SECTION 9 - PHYSICAL AND CHEMICAL PROPERTIES**

APPEARANCE AND ODOR White viscous liquid, characteristic odor	VAPOR PRESSURE 17 mm Hg @ 20° C	
pH 7.5 - 8.5	SPECIFIC GRAVITY (WATER = 1) 1.485	
BOILING POINT / BOILING RANGE 212° F ( 100° C )	SOLUBILITY IN WATER Dispersible	VISCOSITY Not specified
FLASH POINT Non-flammable	VOLATILE ORGANIC COMPOUNDS (VOC's) 0.506 lbs / gallon (60.2 grams / liter) (calculated on water-free basis)	
FLAMMABLE LIMITS LEL: Not applicable      UEL: Not applicable	VAPOR DENSITY (AIR = 1) < 1	
AUTOIGNITION TEMPERATURE Not established	EVAPORATION RATE (WATER = 1) < 1	

**SECTION 10 - STABILITY AND REACTIVITY**

STABILITY UNSTABLE: STABLE: X	CONDITIONS TO AVOID: Extreme temperatures.
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INCOMPATIBILITY (MATERIALS TO AVOID): Strong oxidizers, strong acids.

HAZARDOUS DECOMPOSITION OR BYPRODUCTS: Decomposition will not occur if handled and stored properly. In case of a fire, oxides of carbon, hydrocarbons, fumes or vapors, and smoke may be produced.

HAZARDOUS POLYMERIZATION MAY OCCUR: WILL NOT OCCUR: X	CONDITIONS TO AVOID: None
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**SECTION 11 - TOXICOLOGICAL INFORMATION**

Hazardous Components	CAS # EINECS #	LD50 of Ingredient (Specify Species and Route)	LC50 of Ingredient (Specify Species)
Butyl benzyl phthalate (a,b,c)	85-68-7 201-622-7	2330 mg / kg Oral - rat	Not established
Ethylene glycol monopropyl ether (a)	2807-30-9 220-548-6	3089 mg / kg Oral - rat	2132 ppm / 6H Inhalation - rat
(a,b) See Section 15			

**SECTION 12 - ECOLOGICAL INFORMATION**

No data are available on the adverse effects of this material on the environment. Neither COD nor BOD data are available. Based on the chemical composition of this product it is assumed that the mixture can be treated in an acclimatized biological waste treatment plant system in limited quantities. However, such treatment should be evaluated and approved for each specific biological system. One of the ingredients in this mixture (Butyl benzyl phthalate) is classified as a Marine Pollutant.

**SECTION 13 - DISPOSAL CONSIDERATIONS**

WASTE DISPOSAL METHOD: Dispose of in accordance with local, state, and federal regulations. Product is classified as non - hazardous, however, non-hazardous materials may become hazardous waste upon contact with other products. Refer to 40 CFR 260 - 299 for complete waste disposal regulations. Consult your local, state, or federal agency before disposing of any chemicals. According to the European Waste Catalogue, waste codes are application specific and should be assigned by the user based on the application for which the product is used.

**SECTION 14 - TRANSPORT INFORMATION**

PROPER SHIPPING NAME: Non - Hazardous for Transport	IATA HAZARD CLASS / Packaging Group: Not regulated
DOT HAZARD CLASS / Packaging Group: Not regulated	IMDG HAZARD CLASS: Not regulated
REFERENCE: Not Applicable	RID / ADR Dangerous Goods Code: Not regulated
UN / NA IDENTIFICATION NUMBER: None	UN TDG Class / Packaging Group: Not regulated
LABEL: None Required	Hazard Identification Number (HIN): None
HAZARD SYMBOLS: None	

Note: Transportation information provided is for reference only. Client is urged to consult 49 CFR 100 - 177, IMDG, IATA, EU, United Nations TDG, and WHMIS (Canada) TDG information manuals for detailed regulations and exceptions covering specific container sizes, packaging materials and methods of shipping. Hazard Class 9 must be used if shipping quantity exceeds RQ for this mixture.

# MATERIAL SAFETY DATA SHEET

PRODUCT NAME: ASTEC 2000 FINISH COAT  
March 9, 2009

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## SECTION 15 - REGULATORY INFORMATION

### TSCA (USA - Toxic Substance Control Act)

All components of this product are listed on the U.S. Toxic Substances Control Act Chemical Inventory (TSCA Inventory) or are exempted from listing because a Low Volume or Polymer Exemption has been granted in accordance with 40 CFR 723.50.

### SARA TITLE III (USA - Superfund Amendments and Reauthorization Act)

311/312 Hazard Categories  
Immediate health

### 313 Reportable Ingredients:

(a) Indicates a toxic chemical subject to annual reporting requirements of Section 313 of the Emergency Planning and Community Right-To-Know Act of 1986 and of 40 CFR 372.

### CERCLA (USA - Comprehensive Response Compensation and Liability Act)

(b) The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) has notification requirements for releases or spills to the environment of the Reportable Quantity (RQ for this mixture = 5,000 lbs) or greater amounts, according to 40 CFR 302.

### California Prop 65, Safe Drinking Water and Toxic Enforcement Act of 1986

There is a reportable chemical present (Butyl benzyl phthalate) known to the state of California to cause cancer or reproductive toxicity.

### CPR (Canadian Controlled Products Regulations)

This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and the MSDS contains all the information required by the Controlled Products Regulations. WHMIS Classification: D2B

### IDL (Canadian Ingredient Disclosure List)

Components of this product identified by CAS number and listed on the Canadian Ingredient Disclosure List are shown in Section 2.

### DSL / NDSL (Canadian Domestic Substances List / Non-Domestic Substances List)

Components of this product identified by CAS number are listed on the DSL or NDSL, or are otherwise in compliance with the New Substances Notification (NSN) regulations. Only ingredients classified as "hazardous" are listed in Section 2 unless otherwise indicated.

### EINECS (European Inventory of Existing Commercial Chemical Substances)

Components of this product identified by CAS numbers are on the European Inventory of Existing Commercial Chemical Substances.

WGK Water Quality Index: 1

VbK Index: not applicable

### RISK PHRASES:

R21 Harmful in contact with skin.  
R36 Irritating to eyes.  
R50/53 Very toxic to aquatic organisms, may cause long term adverse effects in the aquatic environment.

### SYMBOL(S) REQUIRED FOR LABEL

Harmful



### SAFETY PHRASES:

S2 Keep out of the reach of children.  
S24/25 Avoid contact with skin and eyes.  
S28 After contact with skin, wash immediately with plenty of soap and water.

## SECTION 16 - OTHER INFORMATION

### Notes & full R-Phrase text

R10 Flammable.  
R21 Harmful in contact with skin.  
R36 Irritating to eyes.

R50/53 Very toxic to aquatic organisms, may cause long term adverse effects in the aquatic environment.  
R61 May cause harm to the unborn child.  
R62 Risk of impaired fertility.

### HMIS HAZARD RATINGS

HEALTH	1*	* = Chronic Health Hazard	2 = MODERATE
FLAMMABILITY	0	0 = INSIGNIFICANT	3 = HIGH
PHYSICAL HAZARD	0	1 = SLIGHT	4 = EXTREME

PERSONAL PROTECTIVE EQUIPMENT C Safety Glasses, Gloves, Apron

### REVISION SUMMARY:

This MSDS has been revised in the following sections:  
Format update

### MSDS Prepared By:

Comprehensive Data Base, Inc.  
P.O. Box 686  
Seffner, FL 33583 USA  
(863) 644 - 3298 [www.compdatabase.com](http://www.compdatabase.com) or [www.msds.cc](http://www.msds.cc)

The information contained herein is believed to be accurate but is not warranted to be so. Data and calculations are based on information furnished by the manufacturer of the product and manufacturers of the components of the product. Users are advised to confirm in advance of need that information is current, applicable and suited to the circumstances of use. Vendor assumes no responsibility for injury to vendee or third persons proximately caused by the material if reasonable safety procedures are not adhered to as stipulated in the data sheet. Furthermore, vendor assumes no responsibility for injury caused by abnormal use of this material even if reasonable safety procedures are followed. Any questions regarding this product should be directed to the manufacturer of the product as described in Section 1.





Two Pine Landfill  
100 Two Pine Drive  
North Little Rock, AR, 72117  
Ph: (501) 982-7336

Original  
Ticket# 966065

Customer Name BLACK JACK ROOFING - CASH CUS Carrier TERRA TERRA RENEWAL  
Ticket Date 08/05/2010 Vehicle# 1 Volume  
Payment Type Credit Card Container  
Manual Ticket# Driver  
Hauling Ticket# Check# \*  
Route Billing # 0121316  
State Waste Code NA Gen EPA ID NA  
Manifest BJR01  
Destination Grid CELL 2  
PO  
Profile 105819AR (ASTEC 2000 FINISH COAT)  
Generator 110-BLACKJACK BLACK JACK ROOFING

	Time	Scale	Operator	Inbound	Gross	
In	08/05/2010 09:46:46	Scale 1	TDODGE		Tare	52680 lb
Out	08/05/2010 10:37:16	Scale 2	TDODGE		Net	30240 lb
					Tons	22440 lb
						11.22

Comments

Product	LD%	Qty	UOM	Rate	Tax	Amount	Origin
1 ASTEC 2000 FINISH	100	11.22	Tons	85.00	85.83	\$953.70	OUT
2 FUEL-T-Fuel Surcha	100		%	4.36		\$45.91	OUT
3 EVFt-L-Standard En	100	1	Load	10.00		\$10.00	OUT
4 ADEQ-ADEQ fee	100	11.22	Tons	2.50	2.52	\$28.05	OUT
5 OCF-OUT OF COUNTY	100	11.22	Tons	1.00	1.01	\$11.22	OUT
6 APR-PROFILE APPROV	100	1	Each	50.00	4.50	\$50.00	OUT

Total Tax \$93.86  
Total Ticket \$1192.74

Driver's Signature



<b>NON HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number	2. Page 1 of 1	3. Emergency Response Phone	4. Manifest Tracking Number <b>BTR 01</b>			
5. Generator's Name and Mailing Address <b>Black Jack Transportation Roofing, Inc. 1305 N. Kansas Street Springdale, AR 71764 (573) 341-3465</b>				Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name <b>Terra Renewal</b>				U.S. EPA ID Number				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address <b>Two Pine Landfill 100 Two Pine Drive N Little Rock, AR 72117 Facility's Phone (800) 963-4776</b>				U.S. EPA ID Number <b>N/A</b>				
9a. 9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID HM Number, and Packing Group (if any))				10. Containers		11. Total Quantity		
				No.	Type	12. Unit Wt./Vol.		
<b>Astec 2000 Finish Coat Contaminated Water 105819AR</b>						3,000		
							13 Waste Codes	
							NA	
14. Special Handling Instructions and Additional Information								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations and is (are) not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law.								
Generator's/Offoror's Printed/Typed Name <b>Black Jack Roofing, Inc. Kaye Faulkner</b>				Signature <b>Kaye Faulkner</b>				
				Month Date Year <b>8-4-10</b>				
Transporter Acknowledgement of Receipt Materials								
16. Transporter 1 Printed / Typed Name <b>Derek Overben</b>				Signature <b>[Signature]</b>				
				Month Date Year <b>8-4-10</b>				
17. Transporter 2 Printed / Typed Name <b>Terra Renewal Service</b>				Signature <b>[Signature]</b>				
				Month Date Year <b>8-4-10</b>				
18. Discrepancy Comments								
18a. Discrepancy Indication Space								
<input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
19. Management Method Codes								
1	2	3	4					
20. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 18a								
Printed / Typed Name <b>L DAVIS</b>				Signature <b>L Davis</b>				
				Month Date Year <b>8-15-10</b>				



Two Pine Landfill  
100 Two Pine Drive  
North Little Rock, AR, 72117  
Ph: (501) 982-7336

Original  
Ticket# 966227

Customer Name BLACK JACK ROOFING - CASH CUS Carrier TERRA TERRA RENEWAL  
Ticket Date 08/06/2010 Vehicle# 1 Volume  
Payment Type Credit Card Container  
Manual Ticket# Driver  
Hauling Ticket# Check# \*  
Route Billing # 0121316  
State Waste Code NA Gen EPA ID NA  
Manifest BJR02  
Destination Grid CELL 2  
PO  
Profile 105819AR (ASTEC 2000 FINISH COAT)  
Generator 110-BLACKJACK BLACK JACK ROOFING

	Time	Scale	Operator	Inbound	Gross	69060 lb*
In	08/06/2010 09:39:39	Scale 2	ldavis4		Tare	30440 lb*
Out	08/06/2010 09:40:10	Scale 2	ldavis4		Net	38620 lb
			* Manual Weight		Tons	19.31

Comments

Product	LD%	Qty	UOM	Rate	Tax	Amount	Origin
1 ASTEC 2000 FINISH	100	19.31	Tons	85.00	147.72	\$1641.35	OUT
2 FUEL-T-Fuel Surcha	100		%	4.36		\$74.95	OUT
3 EVFt-L-Standard En	100	1	Load	10.00		\$10.00	OUT
4 ADEQ-ADEQ fee	100	19.31	Tons	2.50	4.35	\$48.28	OUT
5 OCF-OUT OF COUNTY	100	19.31	Tons	1.00	1.74	\$19.31	OUT

Total Tax \$153.81  
Total Ticket \$1947.70

Driver's Signature



NON HAZARDOUS WASTE MANIFEST		1. Generator ID Number		2. Page 1 of 1		3. Emergency Response Phone		4. Manifest Tracking Number					
				1				BTR 02					
5. Generator's Name and Mailing Address						Generator's Site Address (if different than mailing address)							
Black Jack Transportation Roofing, Inc. 1306 N. Kansas Street Springdale, AR 71764 (573) 341-3465													
6. Transporter 1 Company Name						U.S. EPA ID Number							
Terra Renewal													
7. Transporter 2 Company Name						U.S. EPA ID Number							
8. Designated Facility Name and Site Address						U.S. EPA ID Number							
Two Pine Landfill 100 Two Pine Drive N Little Rock, AR 72117 Facility's Phone (800) 963-4776						N/A							
9a. HM		9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity		12. Unit Wt./Vol.		13. Waste Codes		
					No. Type						NA		
		Astec 2000 Finish Coat Contaminated Water					5,500						
		105819AR											
14. Special Handling Instructions and Additional Information													
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations and is (are) not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law.													
Generator's/Offor's Printed/Typed Name						Signature		Month		Date		Year	
Black Jack Roofing, Inc. Kaye Faulkner						Kaye Faulkner		8		4		10	
Transporter Acknowledgement of Receipt Materials													
16. Transporter 1 Printed / Typed Name						Signature		Month		Date		Year	
Derek Overby						Derek Overby		8		6		10	
17. Transporter 2 Printed / Typed Name						Signature		Month		Date		Year	
Terra Renewal Service						Derek Overby		8		6		10	
18. Discrepancy Comments													
18a. Discrepancy Indication Space													
<input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection													
19. Management Method Codes													
1													
2													
3													
4													
20. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 18a													
Printed / Typed Name						Signature		Month		Date		Year	
C DAVIS						C Davis		8		6		10	

# ADEQ

ARKANSAS  
Department of Environmental Quality

September 2, 2010

Jeff Cook, Environmental and Fleet Safety Manager  
George's, Inc.  
P.O. Drawer 2030  
Springdale, AR 72765-2030

RE: George's Processing Plant, 1306 N. Kansas, Springdale, AR

AFIN: 72-00926      NPDES Permit No.: ARR00B427

Dear Mr. Cook:

On July 30, 2010, I performed a reconnaissance inspection of the industrial stormwater facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This reconnaissance inspection was conducted in conjunction with an emergency response incident that resulted in approximately 14 pounds of Astec 2000 Roof Coating being improperly disposed in a storm drain at George's Processing Plant. This inspection revealed the following violation:

- Unpermitted discharge of Astec 2000 Roof Coating caused pollution to the waters of the State. This is in violation of the Arkansas Water and Air Pollution Control Act, Ark. Code Ann. §8-4-217(a)(1). Per my conversation with Mr. Greg Knight, Corporate Safety Manager, Black Jack Roofing improperly disposed Astec 2000 Roof Coating into a storm drain located on the northwest side of the George's Processing Plant. This waste entered into Spring Creek on the northeast portion of the property.

The above item requires your immediate attention. Please submit a written response to this finding to Cindy Garner, Water Division Enforcement Branch Manager. This response should be mailed to the address below. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all of the necessary documentation (i.e. photographs, receipts of disposal) is due by September 12, 2010.

For additional information you may contact the enforcement section by telephone at 501-682-0639 or by fax at 501-682-0910.

Mr. Cook, George's Processing Plant  
September 2, 2010  
Page 2

If I can be of any assistance, please contact me at 479-267-0811, ext. 12([west@adeq.state.ar.us](mailto:west@adeq.state.ar.us)).

Sincerely,

A handwritten signature in black ink that reads "Jay Alison West". The signature is written in a cursive, flowing style.

Alison West  
District 1 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch

ADEQ Water NPDES Inspection

AFIN: 72-00926

Permit #: ARR00B427

EPA

Form Approved  
OMB No. 2040-0003UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

## NPDES Compliance Inspection Report

## Section A: National Data System Coding

Transaction Code			NPDES										Yr/Mo/Day					Inspec. Type		Inspector		Fac. Typ							
1	N	2	5	3	A	R	R	0	0	B	4	2	7	11	12	1	0	0	7	3	0	17	18	R	19	S	20	2	
Remarks																													
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved													
67						70						71		72		73		74 75										80	

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) George's, Inc. 1306 N. Kansas Springdale, AR 72764		Entry Time/Date 1:30 p.m./7-30-2010		Permit Effective Date 4/1/2004	
		Exit Time/Date 2:45 p.m./7-30-2010		Permit Expiration Date 10/30/2010	
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jeff Cook/Environmental and Fleet Safety Manager/479-927-7125/888-634-4816 Greg Knight/Corporate Safety Manager/479-927-7125/888-634-4816 Troy Green/Plant Manager Bud Kirk/Wastewater Manager				Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Jeff Cook/Environmental and Fleet Safety Manager/479-927-7125/888-634-4816 George's, Inc. P.O. Drawer 2030 Springdale, AR 72765		Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			

Section C: Areas Evaluated During Inspection  
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- Unpermitted discharges of Astec 2000 Roof Coating caused pollution to the waters of the State.

Name(s) and Signature(s) of Inspector(s) Alison West <i>Jay Alison West</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811, Ext. 12/479-267-0819	Date August 31, 2010

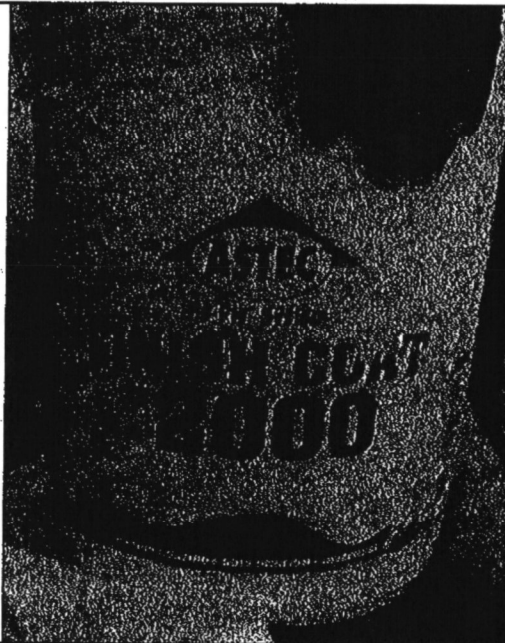
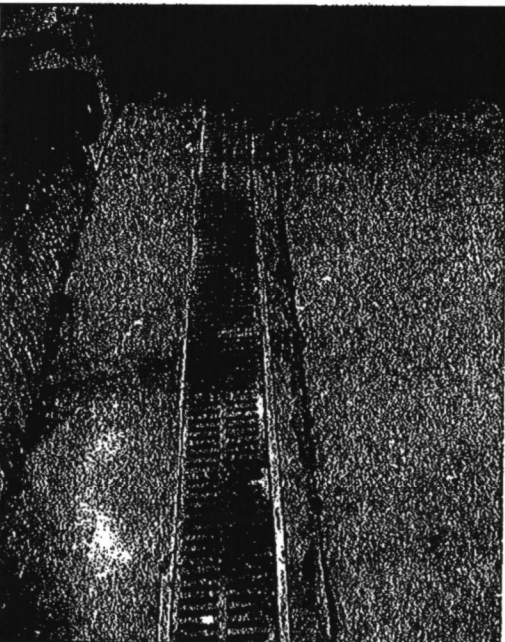
ADEQ Water NPDES Inspection	AFIN: 72-00926	Permit #: ARR00B427
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Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date
-----------------------	-------------------------------------	------





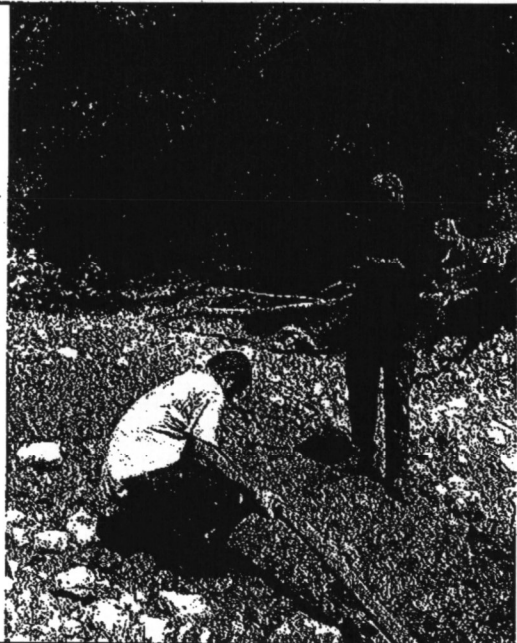
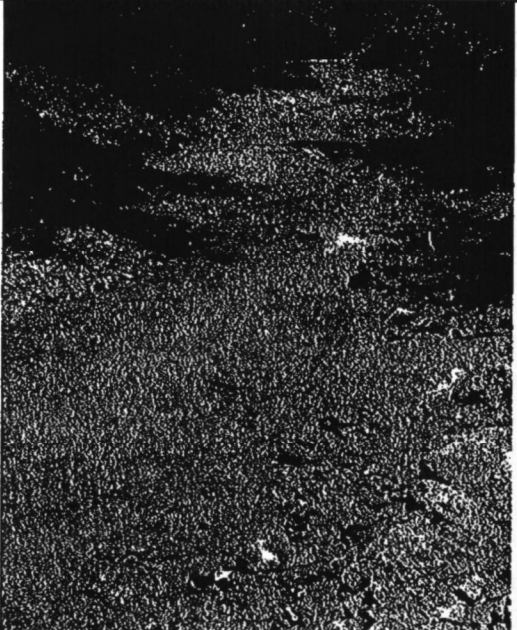
ADEQ Water NPDES Inspection	AFIN: 72-00926	Permit #: ARR00B427
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## Water Division Photographic Evidence Sheet

**Location:** George's Processing Plant-1306 N. Backus, Springdale, AR**Photographer:** Alison West**Witness:** NA**Photo #** 1 **Of** 10**Date:** 7-30-2010 **Time:** 2:37 p.m.**Description:** IMGP5214. Astec Finish Coat 2000 5 gallon bucket.**Photographer:** Alison West**Witness:** NA**Photo #** 2 **Of** 10**Date:** 7-30-2010 **Time:** 2:33 p.m.**Description:** IMGP5213. Storm drain where residue from Astec Finish Coat 2000 was improperly disposed at the plant.

Water Division Photographic Evidence Sheet							
<b>Location:</b>		George's Processing Plant-1306 N. Backus, Springdale, AR					
<b>Photographer:</b>		Alison West			<b>Witness:</b>		NA
<b>Photo #</b>	3	<b>Of</b>	10		<b>Date:</b>	7-30-2010	<b>Time:</b> 1:38 p.m.
<b>Description:</b>		IMGP5196. Contaminated water located in concrete weir located northeast of the facility.					
							
<b>Photographer:</b>		Alison West			<b>Witness:</b>		NA
<b>Photo #</b>	4	<b>Of</b>	10		<b>Date:</b>	7-30-2010	<b>Time:</b> 1:39 p.m.
<b>Description:</b>		IMGP5198. Contaminated water located at the discharge side of the weir.					
							

Water Division Photographic Evidence Sheet							
<b>Location:</b>		George's Processing Plant-1306 N. Backus, Springdale, AR					
<b>Photographer:</b>		Alison West			<b>Witness:</b>		NA
<b>Photo #</b>	5	<b>Of</b>	10	<b>Date:</b>		7-30-2010	<b>Time:</b> 2:19 p.m.
<b>Description:</b>		IMGP5209. Concrete structure across Spring Creek south of the release.					
							
<b>Photographer:</b>		Alison West			<b>Witness:</b>		John Fazio
<b>Photo #</b>	6	<b>Of</b>	10	<b>Date:</b>		7-30-2010	<b>Time:</b> 1:41 p.m.
<b>Description:</b>		IMGP5199. Spring Creek located immediately north of the concrete structure.					
							

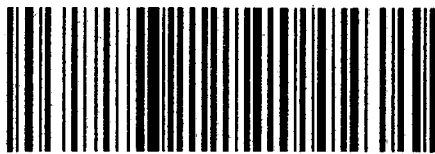
Water Division Photographic Evidence Sheet							
<b>Location:</b>		George's Processing Plant-1306 N. Backus, Springdale, AR					
<b>Photographer:</b>		Alison West			<b>Witness:</b>		NA
<b>Photo #</b>	7	<b>Of</b>	10	<b>Date:</b>		7-30-2010	<b>Time:</b> 1:42 p.m.
<b>Description:</b>		IMGP5200. Contaminated water from Spring Creek being vacuumed.					
							
<b>Photographer:</b>		Alison West			<b>Witness:</b>		NA
<b>Photo #</b>	8	<b>Of</b>	10	<b>Date:</b>		7-30-2010	<b>Time:</b> 1:46 p.m.
<b>Description:</b>		IMGP5205. Milky colored water from the spill that needed to be removed from Spring Creek.					
							



## Water Division Photographic Evidence Sheet

**Location:** George's Processing Plant-1306 N. Backus, Springdale, AR**Photographer:** Alison West**Witness:** NA**Photo #** 9 **Of** 10**Date:** 7-30-2010 **Time:** 2:18 p.m.**Description:** IMGP5208. Close-up of milky colored water in Spring Creek from IMGP5205.**Photographer:** Alison West**Witness:** NA**Photo #** 10 **Of** 10**Date:** 7-30-2010 **Time:** 2:23 p.m.**Description:** IMGP5212. Terra Renewal Service truck used to store contaminated water from Spring Creek.

**CERTIFIED MAIL™**



7010 1060 0000 1318 1913



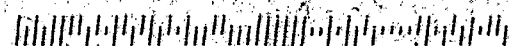
FROM:

**GEORGE'S**  
**INC.**

P.O. Drawer G / Springdale, AR 72765-2030

TO:

ADEQ  
Water Division (Attn: Cindy Garner)  
5301 Northshore Drive  
North Little Rock, AR 72118-5317





September 16, 2010

ADEQ  
ATTN: Cindy Garner  
Water Division Enforcement Division  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

**RE: NPDES Compliance Inspection Report dated August 25, 2010 (attached)**

Dear Ms Garner,

Allison West has requested I send the following information to you regarding a spill of caustic soda on our lot on 7-21-10. A detailed summary of events, results, corrective action, and subsequent conditions follows:

While unloading a bulk container of Caustic Soda Solution, a pin on the chain sprocket of the fork lift being used sheared causing the forks to tilt sideways dropping a bulk container of Caustic Soda Solution (50%) that was being unloaded from a truck. The main fill bung of the container cracked open and spilled approximately 29 gallons of solution onto the asphalt parking lot before the container could be righted.

Contrary to our company HAZWOPER and HAZCOM policies, an employee opened a fire hydrant and attempted to dilute the spill. As a result, an unknown part of the spilled solution entered the storm drain about 100 feet away from the spill. When company officials were notified, they dispatched to the scene and assumed control. The solution remaining on the surface of the lot was neutralized using an acid/water solution.

We immediately began inspecting potentially affected areas. Where storm water first appears back above ground across the highway from our lot, pH appeared to be above neutral levels indicating approximately 11 according to testing package instructions. Inspections were continued down stream. Further down stream there are two drainage containment ponds associated with the Station Apartments located about 1/2 mile south of our property. Testing indicated pH levels were normal in the 7-8 range.

Subsequent testing at the outflow from our lot a couple hours later with ADEQ inspectors Fazio and West present revealed a pH of 7 using an electronic monitor. Both ADEQ inspectors left the area shortly afterwards.

To ensure that the situation had stabilized and that no undetected material was entering any streams or public waters we tested water from the storm water drainage ditch near the outflow area on our property and at the next two points where the ditch returned above ground at the railway trestle and the containment pond at the Station Apartments. No abnormal levels were detected.

The following day on July 22 several soil samples were taken from the bed of drainage ditch on our property. We used a water slurry method without neutralization to test the pH levels in our laboratory. The pH levels varied from a low of 7.75 to a high of 8.93 and averaged 8.36 as measured by a calibrated industrial quality electronic tester at our laboratory. We also tested an



adjacent unaffected drainage ditch approximately 100 meters to the West using the same method for control purposes. The pH at that location was 8.74. Using paper, the average ranged from 7 to 8 and average pH was 7.6. Where aquatic life was present in some of these samples it was alive and active (see photo, video available on request via email).

Summary: Within a few hours after the unwanted spill, conditions in the drainage ditch appeared normal according to our observations. Observations over the next several days did not reveal any other problems. The ditch has water flowing through it at all times as it is apparently fed by several natural springs. We believe the continuous water flow dispersed and diluted whatever spilled material present to insignificant levels. No pH levels indicating the presence of caustic soda solution was detectable in runoff after the initial event.

Regarding the other observations in the attached report:

1. The used oil container has been removed from the parking lot and used oil is now being disposed of in our permitted above ground used oil container at the automotive truck shop. (See photo). The soil in the area of the storage tank was removed and sent for proper disposal to a TSDF. Other materials that were stored in that area have been moved into indoor storage.
2. The breeding dumpster at the further processing plant has been covered when not in use. Additional engineering plans are being studied to further improve this part of the operation.
3. The sulfuric acid solution in the container was used to neutralize the spilled caustic material on the surface of the lot. The container did not leak and no material from it got into the storm drain. The contents (less than 1 gallon of sulfuric acid) were disposed of through our wastewater system.
4. Regarding photo number 2, waste from reefer trucks would collect in low lying areas of the parking lot. Those areas have been repaired to reduce pooling (see attached photo). The water is condensation from refrigeration units.

Based on our observations and sampling, no significant amount of the caustic material from the spill entered the waters of the State of Arkansas or the waters of the United States. The spilled material was largely contained within our underground storm water system and drainage ditch. As far as we can tell, due to underground springs in the area flowing continuously through our storm water system, no measurable amounts of unwanted material left our property.

If I can be of further assistance or if you need additional information, please let me know.



Jeff Cook  
Environmental and Fleet Safety Manager  
George's, Inc.  
PO Drawer G  
Springdale, AR 72765-2030  
479.927.7125 office  
479.530.7611 cell

Photos attached.  
Waste Manifest Attached.

Caustic Soda Spill  
George's Main Compound  
7-21-10



Fire Hydrant

Spilled container location



Aquatic Life was active and present in stream bed samples.





Used oil tank and other stored materials moved.



Parking lot repairs.





Parking lot repairs.

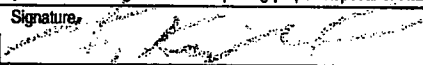
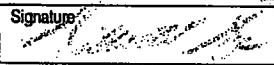




Breeding dumpster has been covered when not in use.

Dirt was mixed w/oil dry and disposed of @ Kansas St. facility.

Please print or type  
(Form designed for two columns (2-574) (year 1997))

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number <b>ARCB50640707</b>		2. Page 1 of <b>2</b>	3. Emergency Response Phone <b>479-927-7117</b>		4. Waste Tracking Number <b>AR-NH0267127</b>		
5. Generator's Name and Mailing Address <b>Georgas Springdale Processing Plant 1306 North Kansas Springdale, AR 72764</b>					Generator's Site Address (if different than mailing address) <b>Georgas Springdale Processing Plant 1306 North Kansas Springdale, AR 72764</b>				
6. Transporter 1 Company Name <b>Kinross Transportation LLC</b>					U.S. EPA ID Number <b>AKR000016733</b>				
7. Transporter 2 Company Name					U.S. EPA ID Number				
8. Designated Facility Name and Site Address <b>KINROSS 1007 Vulcan Road Benton, AR 72015</b>					U.S. EPA ID Number <b>ARD981057070</b>				
Facility's Phone: <b>501-778-6225</b>									
9. Waste Shipping Name and Description					10. Containers		11. Total Quantity	12. Unit Wt/Vol	
					No.	Type			
1. Non Regulated Material					5	DN	90	D	NON RCRA
2.									
3.									
4.									
13. Special Handling Instructions and Additional Information <b>1. 1000-11500 Floor Sweep Material and Oil</b>									
<b>Pickup 06/06/2010 10:00 AM      LOAD # 103810</b>									
14. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulations for reporting proper disposal of Hazardous Waste.									
Generator's/Officer's Printed/Typed Name <b>Michael R. Knight</b>					Signature 		Month   Day   Year <b>06   06   2010</b>		
15. International Shipments: <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____									
Transporter Signature (for exports only): _____ Date leaving U.S.: _____									
16. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name <b>Michael R. Knight</b>					Signature 		Month   Day   Year <b>06   06   2010</b>		
Transporter 2 Printed/Typed Name					Signature		Month   Day   Year		
17. Discrepancy									
17a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input checked="" type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
Manifest Reference Number: _____									
17b. Alternate Facility (or Generator)					U.S. EPA ID Number				
Facility's Phone: _____									
17c. Signature of Alternate Facility (or Generator)					Month   Day   Year				
18. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 17a									
Printed/Typed Name					Signature		Month   Day   Year		

GC Labels Printed in the USA  
1-800-997-6966

GENERATOR'S/SHIPPER'S INITIAL COPY

Recorder Part# MANIFEST-06NH-W  
913-697-6966



ARKANSAS  
Department of Environmental Quality

September 10, 2010

Jeff Cook, Environmental and Fleet Safety Manager  
George's, Inc.  
P.O. Drawer 2030  
Springdale, AR 72765-2030

RE: George's Main Complex at 402 W. Robinson, Springdale, AR

AFIN: 72-00234      NPDES Permit No.: ARR00B454

Dear Mr. Cook:

On July 20, 2010, John Fazio, District 1 Inspector, and I performed a reconnaissance inspection of the industrial stormwater facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This reconnaissance inspection was conducted in conjunction with an emergency response incident that resulted in approximately 29 gallons of Caustic Soda Solution (50%) spilling onto the asphalt parking lot and entering George's Main Complex storm drain. This inspection revealed the following violations:

- Unpermitted discharges of caustic soda solution and sulfuric acid solution were causing pollution to the waters of the State. This is in violation of the Arkansas Water and Air Pollution Control Act, Ark. Code Ann. §8-4-217(a)(1). During the emergency response incident, you stated an employee opened a fire hydrant to wash the Caustic Soda Solution that had spilled onto the asphalt lot into a storm drain. The spill occurred due to the main fill bung cracking on the bulk container when the bulk container was dropped on the ground due to equipment failure. You further stated that the sulfuric acid solution was then poured into the storm drain in an attempt to neutralize the caustic solution.
- Placement of waste in such a manner that it has the potential to enter the waters of the State in violation of the Arkansas Water and Air Pollution Control Act 8-4-217, (a)(2). The following items need to be addressed:
  1. At the time of the investigation, there was a container of leaking sulfuric acid solution on the asphalt lot located west of a storm drain. The sulfuric acid was said to have been used to neutralize the caustic soda that had been spilled. The trash can was placed over the sulfuric acid container because the employees stated the container had bloated and they were concerned it would explode. There were no controls around the storm drain to prevent the sulfuric acid solution from entering the storm drain had the container failed or exploded.
  2. Used oil had spilled onto the parking lot located on the northeast side of the facility near a used oil container in the boneyard.

Mr. Cook, George's Main Complex  
September 10, 2010  
Page 2

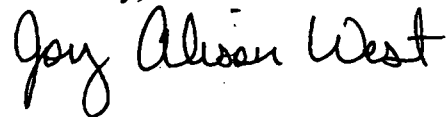
3. A breeding dumpster located near a storm drain was not covered.

The above item requires your immediate attention. Please submit a written response to this finding to Cindy Garner, Water Division Enforcement Branch Manager. This response should be mailed to the address below. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all of the necessary documentation (i.e. photographs) is due by September 20, 2010.

For additional information you may contact the enforcement section by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 479-267-0811, ext. 12([west@adeq.state.ar.us](mailto:west@adeq.state.ar.us)).

Sincerely,



Alison West  
District 1 Field Inspector  
Water Division

cc: Water Division Enforcement Branch  
Water Division Permits Branch



Form Approved  
OMB No. 2040-0003UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

## NPDES Compliance Inspection Report

## Section A: National Data System Coding

Transaction Code			NPDES										Yr/Mo/Day					Inspec. Type		Inspector		Fac. Type									
1	N	2	5	3	A	R	R	0	0	B	4	5	4	11	12	1	0	0	7	2	0	17	18	R	19	S	20	2			
Remarks																															
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved															
67						69						70		N		71		N		72		N		73		74		75		80	

## Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) George's, Inc. 402 W. Robinson Springdale, AR 72764		Entry Time/Date 2:30 p.m./7-20-2010	Permit Effective Date 4/1/2004
		Exit Time/Date 3:50 p.m./7-20-2010	Permit Expiration Date 10/30/2010
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Jeff Cook/Environmental and Fleet Safety Manager/479-927-7125/888-634-4816 Bud Kirk/Wastewater Manager Stan Foust/Production Manager			Other Facility Data
Name, Address of Responsible Official/Title/Phone and Fax Number Jeff Cook/Environmental and Fleet Safety Manager/479-927-7125/888-634-4816 George's, Inc P.O. Drawer 2030 Springdale, AR 72765			
			Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Section C: Areas Evaluated During Inspection  
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

## Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

- Placement of waste in such a manner that it has the potential to enter the waters of the State in violation of the Arkansas Water and Air Pollution Control Act 8-4-217, (a)(2). The following items need to be addressed:
  - Used oil had spilled onto the parking lot located on the northeast side of the facility near a used oil container in the boneyard.
  - A breeding dumpster located near a storm drain was not covered.
  - At the time of the investigation, there was sulfuric acid solution in a container on the parking lot covered by a plastic trash can located west of a storm drain. The sulfuric acid was said to have been used to neutralize the caustic soda that had been spilled. The trash can was placed over the sulfuric acid container because the employees stated the container had bloated and they were concerned it would explode. There were no controls around the storm drain to prevent the sulfuric acid solution from entering the storm drain had the container failed or exploded.
- Unpermitted discharges of caustic soda solution and sulfuric acid solution were causing pollution to the waters of the State.

Name(s) and Signature(s) of Inspector(s) Alison West <i>Joy Alison West</i>	Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811, Ext. 12/479-267-0819	Date August 25, 2010
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

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## Water Division NPDES Photographic Evidence Sheet

**Location:** George's Further Processing Plant**Photographer:** Alison West**Witness:** John Fazio**Photo #**

1

**Of**

7

**Date:**

7-20-2010

**Time:**

3:18 p.m.

**Description:** Waste from reefer truck.**Photographer:** Alison West**Witness:** John Fazio**Photo #**

2

**Of**

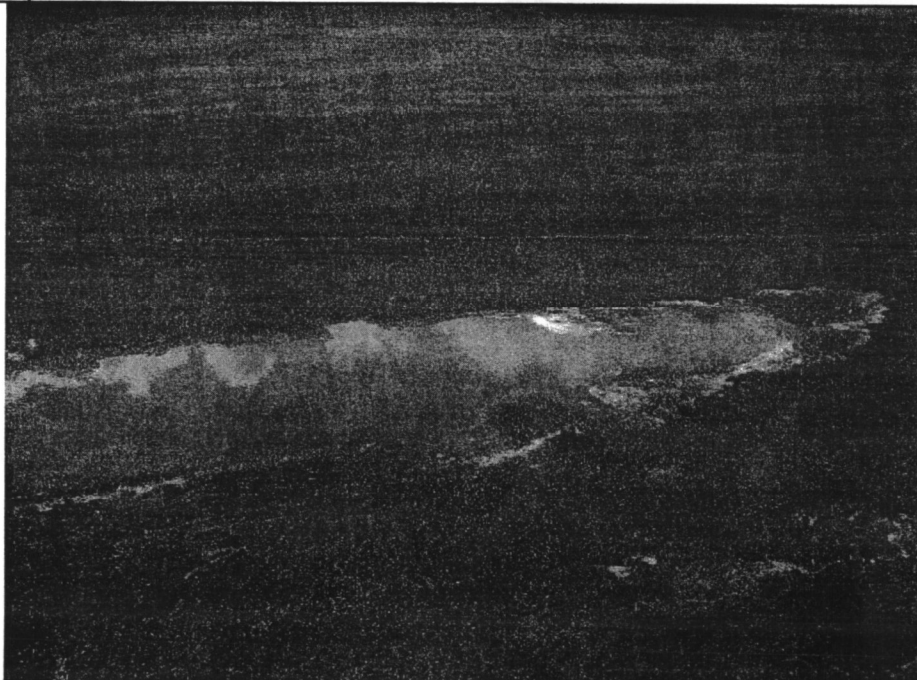
8

**Date:**

7-20-2010

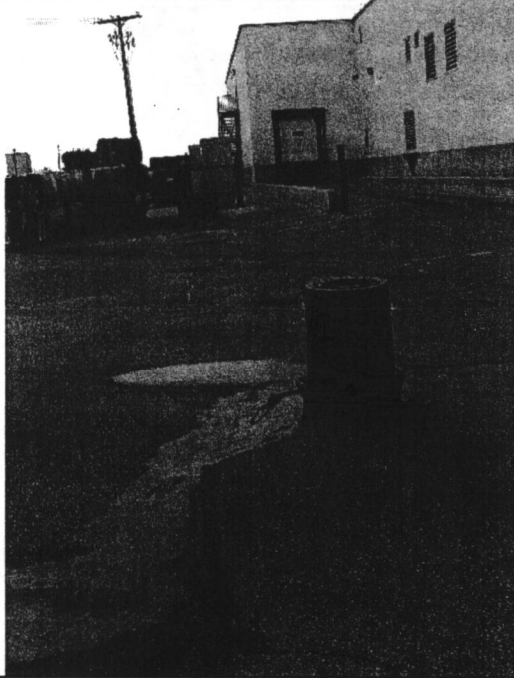
**Time:**

3:17 p.m.

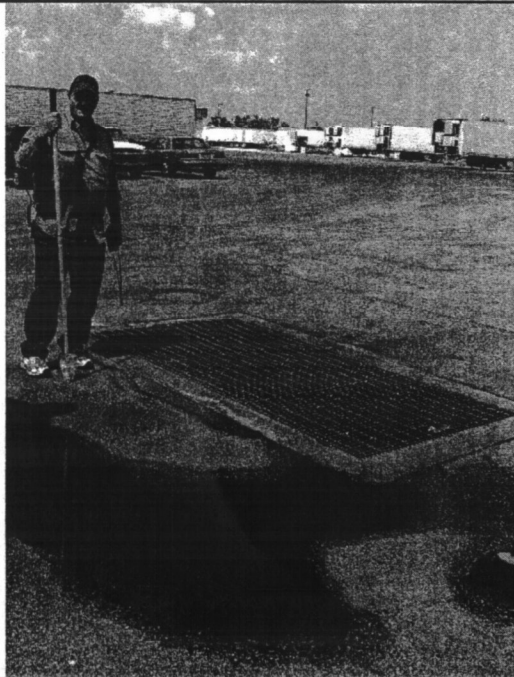
**Description:** Waste from reefer truck. Same location as picture above.

## Water Division NPDES Photographic Evidence Sheet

<b>Location:</b>	George's Further Processing Plant						
<b>Photographer:</b>	Alison West				<b>Witness:</b>	John Fazio	
<b>Photo #</b>	3	<b>Of</b>	8		<b>Date:</b>	7-20-2010	<b>Time:</b> 3:19 p.m.
<b>Description:</b>	Sulfuric acid in parking lot with a container over it. This is located west of a storm drain located in the parking lot.						

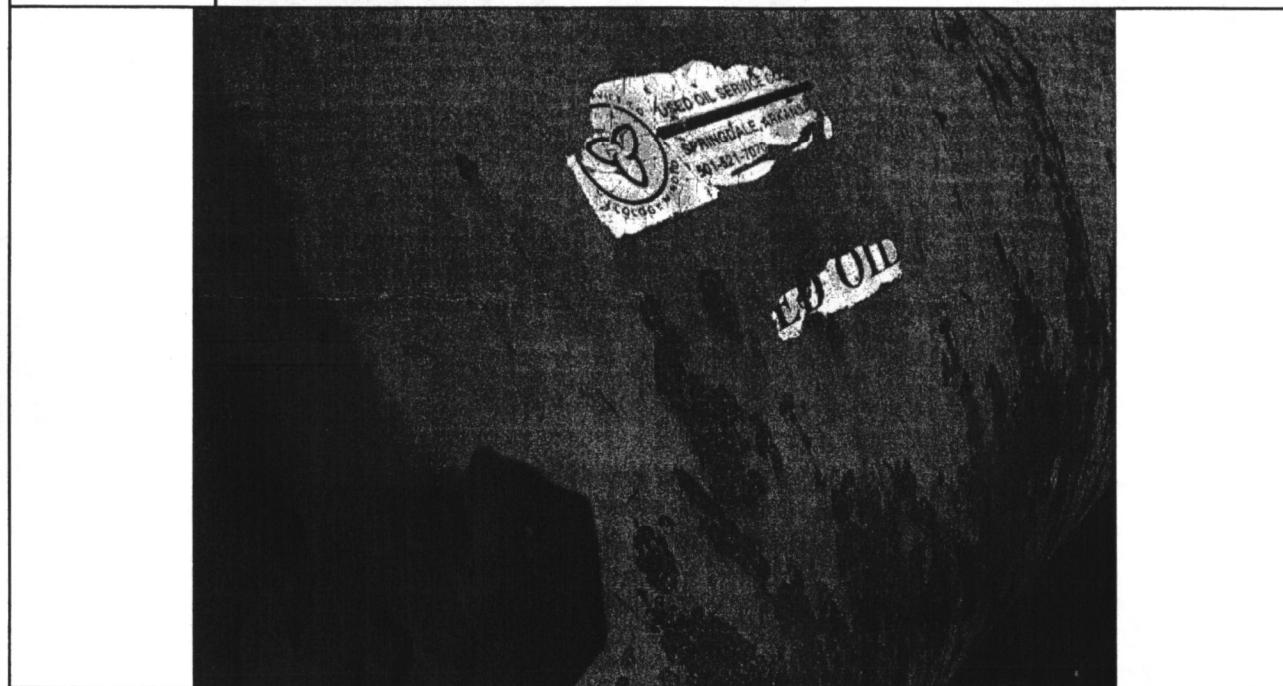


<b>Photographer:</b>	Alison West				<b>Witness:</b>	John Fazio	
<b>Photo #</b>	4	<b>Of</b>	8		<b>Date:</b>	7-20-2010	<b>Time:</b> 3:21 p.m.
<b>Description:</b>	Storm drain located east of the sulfuric acid.						



Water Division NPDES Photographic Evidence Sheet							
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<b>Location:</b>		George's Further Processing Plant						
<b>Photographer:</b>		Alison West			<b>Witness:</b>		John Fazio	
<b>Photo #</b>	5	<b>Of</b>	8		<b>Date:</b>	7-20-2010	<b>Time:</b>	3:26 p.m.
<b>Description:</b>		Used oil container near boneyard.						



<b>Photographer:</b>		Alison West			<b>Witness:</b>		John Fazio	
<b>Photo #</b>	6	<b>Of</b>	8		<b>Date:</b>	7-20-2010	<b>Time:</b>	3:25 p.m.
<b>Description:</b>		Oil spilled from used oil container.						



## Water Division NPDES Photographic Evidence Sheet

Location: George's Further Processing Plant

Photographer: Alison West

Witness: John Fazio

Photo #

7

Of

8

Date:

7-20-2010

Time:

3:25 p.m.

Description:

Oil spilled from used oil container.



Photographer:

Witness:

Photo #

8

Of

8

Date:

Time:

Description:

Google Earth Imagery of George's Further Processing Plant





**CERTIFIED MAIL™**



7010 1060 0000 1318 1920



FROM:

**GEORGE'S  
INC.**

P.O. Drawer G / Springdale, AR 72765-2030

TO:

ADEQ  
ATTN: Cindy Garner  
Water Enforcement Division  
5301 Northshore Drive  
North Little Rock, AR 72118-5317