

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 breading 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).

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Alison West

District 1 Field Inspector

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

\$ I	EPA	Form Approved OMB No. 2040-0003												
		UNIT	ED STATE			NTAL PR		ON AGE	NCY					
	NPDES	SC	Comp		0			ctio	n l	Report				
Section A: National Data System Coding														
1 [1 N 2 5 3 A R R 0 0 B 4 5 4 11 12 1 0 0 7 2 0 17 18 Remarks Inspection Work Days Facility Evaluation Rating BI QA											Inspec. Type		
	07		70	11			71		J			00		
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) George's, Inc. Entry Time/Date 2:30 p.m./7-20-2010											Permit Effective Date 4/1/2004			
	W. Robinson ngdale, AR 72764									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 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 Other Facility Data Other Facility Data											er Facility Data			
			(S =	= Satisfa						uring Inspection isfactory, N = Not Evaluated)				
N	Permit	N	Flow N	Measur	ement			N	Op	perations & Maintenance	N Sampling			
N	Records/Reports	N	Self-M	Ionitor	ing Pr	g Program			N Sludge Handling/Disposal			N Pollution Prevention		
M	Facility Site Review	N	Comp	liance S	Schedu	ıles		N	Pre	etreatment	N	Multimedia		
N	Effluent/Receiving Waters	N	Labor				.~	M		orm 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 breading 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. 														
	ne(s) and Signature(s) of Inspector(s)				Agency/Office/Telephone/Fax AR Dept. of Environmental Quality-Fayetteville 479-267-0811, Ext. 12/479-267-0819						Date August 25, 2010		
Sign	nature of Reviewer				Agency/Office/Phone and Fax Numbers					Date				

ADEQ Water NPDES Inspection	AFIN: 72-00234	Permit #: ARR00B454	
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	Water Division NPDES Photographic Evidence Sheet										
Location: George's Further Processing Plant											
Photograph	er: A	Alison	West		Witness:	John Fazio					
Photo # 1 O			7		Date:	7-20-2010	Time:	3:18 p.m.			
Description	: V	Vaste	from reef	fer 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										
Location: George's Further Processing Plant											
Photograph	er:	A	lison	West		Witness:	John Fazio	John Fazio			
Photo #	(3)	3	Of	8		Date:	7-20-2010	Time:	3:19 p.m.		
Description	:	Sulfuric acid in parking lot with a container over it. This is located west of a storm drain located in the parking lot.									



Photograph	er:	Alison	West		Witness:	John Fazio	John Fazio		
Photo #	4	Of	8		Date:	7-20-2010	Time:	3:21 p.m.	
Decemintion		Storms durin located aget of the gulfymic acid							

Description: Storm drain located east of the sulfuric acid.



	Water Division NPDES Photographic Evidence Sheet										
Location: George's Further Processing Plant											
Photograph	er:	Alison	West		Witness:	John Fazio					
Photo # 5		Of	8		Date:	7-20-2010	Time:	3:26 p.m.			
Description	:	Used o	il contair	ner near boneyard.							



 Photographer:
 Alison West
 Witness:
 John Fazio

 Photo #
 6
 Of
 8
 Date:
 7-20-2010
 Time:
 3:25 p.m.

Description: Oil spilled from used oil container.



	Water Division NPDES Photographic Evidence Sheet										
Location:	Location: George's Further Processing Plant										
Photograph	er: A	Alison	West		Witness:	John Fazio					
Photo #	7	Of	8		Date:	7-20-2010	Time:	3:25 p.m.			
Description	: (Dil spi	lled from	used oil container.							



 Photographer:
 Witness:

 Photo #
 8
 Of
 8
 Date:
 Time:

Description: Google Earth Imagery of George's Further Processing Plant

