



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).

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

--	--	--

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									
--	--	--	--	--	--	--	--	--	--

Location:	George's Further Processing Plant								
------------------	-----------------------------------	--	--	--	--	--	--	--	--

Photographer:	Alison West				Witness:	John Fazio			
----------------------	-------------	--	--	--	-----------------	------------	--	--	--

Photo #	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.								
---------------------	--	--	--	--	--	--	--	--	--



Photographer:	Alison West				Witness:	John Fazio			
----------------------	-------------	--	--	--	-----------------	------------	--	--	--

Photo #	4	Of	8	Date:	7-20-2010	Time:	3:21 p.m.		
----------------	---	-----------	---	--------------	-----------	--------------	-----------	--	--

Description:	Storm drain located east of the sulfuric acid.								
---------------------	--	--	--	--	--	--	--	--	--



Water Division NPDES Photographic Evidence Sheet									
--	--	--	--	--	--	--	--	--	--

Location:	George's Further Processing Plant								
------------------	-----------------------------------	--	--	--	--	--	--	--	--

Photographer:	Alison West				Witness:	John Fazio			
----------------------	-------------	--	--	--	-----------------	------------	--	--	--

Photo #	5	Of	8		Date:	7-20-2010	Time:	3:26 p.m.	
----------------	---	-----------	---	--	--------------	-----------	--------------	-----------	--

Description:	Used oil container 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:	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								
---------------------	---	--	--	--	--	--	--	--	--

