

June 3, 2011

Mr. David Gasper, Facility General Manager TETRA Technologies, Inc P.O. Box 10760 El Dorado, AR 71730

AFIN: 70-01294 NPDES Permit No.: ARG670546

Dear Mr. Gasper:

On 05/18/2011, I performed an inspection of the TETRA Technologies, Inc 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 inspection revealed that the facility has not performed any hydrostatic testing since at least August 2009. If you wish to cancel this permit please submit a Notice of Termination to the ADEQ Permits Branch at the address below.

If I can be of any assistance, please contact me at 870-862-0680.

Sincerely,

John W. Lamb

District 8 Field Inspector

John W. Land

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

ADEQ Water NPDES Inspection	AFIN: 70-01294	Permit #: ARG670546

≎ EPA									Form Approved OMB No. 2040-0003														
	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460 NPDES Compliance Inspection Report																						
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							Sec	ction :	B: Fa	cility	Data												
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) TETRA Technologies, Inc Entry Time/Date 13:23/05/18/2011										nit E f uly 2		ive Da	te										
	Feed Mill Road Dorado, AR										Exit Time 14:37/05/							nit E l une		ation D 3	ate		
	ne(s) of On-Site Representative(s)/Tid Gasper, General Manager, 87			and Fax	x Num	iber(s	3)									Oth	er Fa	cility	Data	a			
Name, Address of Responsible Official/Title/Phone and Fax Number David Gasper, General Manager, 870-863-1908 TETRA Technologies, Inc P.O. Box 10760 El Dorado, AR 71730 Contacted Yes No																							
			(5	S = Satis							iring Inspe sfactory, N			uated)								
S	Permit	N	Flow	Measu	remei	nt			N	Op	erations & Maintenance S					S	S Sampling						
N	Records/Reports	N	Self-	Monito	ring P	rogr	am		N	Slu	ndge Handling/Disposal					N	Pollution Prevention						
S	Facility Site Review	N	Con	pliance	Sche	dules			N	Pre	retreatment					N	Multimedia						
N	Effluent/Receiving Waters	N		oratory					N		orm Water						Other:						
Section D: Summary of Findings/Comments (Attach additional sheets if necessary) This permit was issue d in April 2009. According to Mr. David Gasper, Manager, he has only been at this plant for a few months and was unaware of this permit. Mr. Shawn Shoemake, HSE Manager, stated he had been there since August 2009 and he knew that they had not tested anything since that time. He was unsure if any testing had occurred prior to August 2009.																							
J.	ne(s) and Signature(s) of Inspector(s W. Lamb	s)				Ark 340	00 Wes	Depa st. Hil	rtmen Isboro	t of E , El E	e/Fax Environmental Quality Dorado, AR 71730 362-3509						Date 25 May 2011						
Sign	nature of Reviewer					Ag	ency/0	Office	e/Phon	e and	Fax Numbo	ers					Dat	e					
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ADEQ Water NPDES Inspection	AFIN: 70-01294	Permit #: ARG670546

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑y □n □na □ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□y □n ☑na □ne
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y □N □NA □NE
4. ALL DISCHARGES ARE PERMITTED:	☑Y □N □NA □NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	□S □M □U □NA ☑NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	□Y □N □NA ☑NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	□s □m □u □na ☑ne
a. DATES AND TIME(S) OF SAMPLING:	□Y □N □NA ☑NE
b. EXACT LOCATION(S) OF SAMPLING:	□y □n □na ☑ne
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	□Y □N □NA ☑NE
d. ANALYTICAL METHODS AND TECHNIQUES:	□Y □N □NA ☑NE
e. RESULTS OF CALIBRATIONS:	□Y □N □NA ☑NE
f. RESULTS OF ANALYSES:	□Y □N □NA ☑NE
g. DATES AND TIMES OF ANALYSES:	□Y □N □NA ☑NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	□Y □N □NA ☑NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	□S □M □U □NA ☑NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	□S □M □U □NA ☑NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	□Y □N □NA ☑NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	□S □M □U □NA ☑NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	□S □M □U □NA ☑NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	□S □M □U □NA ☑NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	□s □m □u □na ☑ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	□S □M □U □NA ☑NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	□S □M □U □NA ☑NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	□S □M □U □NA ☑NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	□S □M □U □NA ☑NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	□y □n □na ☑ne
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	□Y □N □NA ☑NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	□Y □N □NA ☑NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	□y □n □na Øne
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	□y □n □na Øne
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	□y □n □na ☑ne
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	□Y □N □NA ØNE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N □NA ØNE

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SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	□S □M □U □NA ☑NE
DETAILS:	·
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	□Y □N □NA ☑NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	□y □n □na ☑ne
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	□y □n □na ☑ne
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	□Y □N □NA ☑NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	□Y □N □NA ☑NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	□Y □N □NA ☑NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	□y □n □na ☑ne
b. PROPER PRESERVATION TECHNIQUES USED:	□y □n □na ☑ne
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	□Y □N □NA ☑NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□Y □N □NA ☑NE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	□S □M □U □NA ☑NE
DETAILS:	•
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE:	□y □n □na ☑ne
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	□Y □N □NA ☑NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	□Y □N □NA ☑NE
4. CALIBRATION FREQUENCY ADEQUATE:	□Y □N □NA ☑NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	□y □n □na ☑ne
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	□y □n □na ☑ne
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	□Y □N □NA ☑NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	□Y □N □NA ☑NE
9. HEAD MEASURED AT PROPER LOCATION:	□Y □N □NA ☑NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	□S □M □U □NA ☑NE
DETAILS:	•
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	□y □n □na ☑ne
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	□Y □N □NA ☑NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	□Y □N □NA ☑NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	□y □n □na ☑ne
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	□y □n □na ☑ne
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	□y □n □na ☑ne
7. COMMERCIAL LABORATORY USED:	□Y □N □NA ☑NE
a. LAB NAME:	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED:	
8. BIOMONITORING PROCEDURES ADEQUATE:	□y □n □na ☑ne
a. PROPER ORGANISMS USED:	□Y □N □NA ☑NE
b. PROPER DILUTION SERIES FOLLOWED:	□Y □N □NA ☑NE
c. PROPER TEST METHODS AND DURATION:	□Y □N □NA ☑NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	□y □n □na ☑ne

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SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS										
BASED ON	VISUAL OBS	ERVATIONS C	NLY			□s□	JM □l	J □NA ☑NE		
DETAILS:	DETAILS:									
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COL	OR	OTHER		
	H: SLUDGE									
	DISPOSAL ME	ETS PERMIT R	REQUIREMEN	ΓS			JM □l	J □NA ☑NE		
DETAILS:										
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:					□U □NA ☑NE		
	ECORDS MAINTAINED						Is □M	□u □na ☑ne		
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	O TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):					
OFOTION				IDEO						
	I: SAMPLIN						7			
	RESULTS WITH	IIN PERMIT R	EQUIREMENT	8		⊔S L	лм п	J ØNA □NE		
DETAILS:	007411150 71110 11100	FOTION								
	OBTAINED THIS INSPE		45TUOD 5050UE	NOV			ЦΥ	Øn □na □ne		
	AMPLE: GRAB: PRESERVED:	LCOMPOSITE: N	METHOD: FREQUE	NCY:						
		S OPTAINED:						ON MA ONE		
	4. FLOW PROPORTIONED SAMPLES OBTAINED: 5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: CY IN VINA INE									
	EPRESENTATIVE OF									
	PLIT WITH PERMITTER		E OF BIOOFFAROE.							
	CUSTODY PROCEDUI									
	COLLECTED IN ACCO		IT:					□N ☑NA □NE		
SECTION	J: STORM V	WATER POLL	UTION PREV	/ENTION PLA	AN					
	ATER MANAG					□s□]м □	J ⊠NA □NE		
DETAILS:					-					
1. SWPPP UF	DATED AS NEEDED:	DATE OF LAST UP	DATE:				□Y	□n ☑na □ne		
2. SITE MAP	NCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:				□ү	□n Øna □ne		
3. POLLUTIO	N PREVENTION TEAM	IDENTIFIED:					□Y	□n ☑na □ne		
4. POLLUTIO										
5. LIST OF PO	TENTIAL POLLUTANT	Γ SOURCES:					□Y	□n Øna □ne		
6. LIST OF PO	OTENTIAL SOURCES A	AND PAST SPILLS AND	D LEAKS:				□Y	□n Øna □ne		
7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:				□Y	□n Øna □ne		
8. LIST OF ST	RUCTURAL BMPS:						□Y	□n ☑na □ne		
9. LIST OF NO	ON-STRUCTURAL BMF	PS:					□Y	□n ☑na □ne		
10. BMPS PRO	PERLY OPERATED A	ND MAINTAINED:					□Y	□n ☑na □ne		
11. INSPECTIO	ONS CONDUCTED AS I	REQUIRED:					□Y	□n ☑na □ne		