



ARKANSAS
Department of Environmental Quality

August 4, 2010

Mr. Darrell Watts, Owner
Watts Auto Salvage
1 Oak Hill Lane
Greenbrier, AR 72058

RE: Compliance Inspection

AFIN: Not yet assigned (Faulkner County) NPDES Permit No.: No Permit

Dear Mr. Watts:

On July 9, 2010, I performed a routine compliance inspection of Watts Auto Salvage in accordance with the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended, Ark. Code Ann. 8-4-101 et seq.), and the Clean Water Act (33 U.S.C. 1251 et seq.), and the regulations promulgated thereunder. This inspection was conducted in response to an anonymous complaint received concerning the operation of your salvage yard without obtaining an industrial storm water permit. This inspection revealed the following violation:

Watts Auto Salvage was found to be operating a used auto parts salvage facility (SIC 5015) without having applied for and obtaining coverage under industrial storm water permit ARR000000. This is a violation of the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended, Ark. Code Ann. 8-4-101 et seq.), and the Clean Water Act (33 U.S.C. 1251 et seq.). You must submit an application for coverage under the above referenced permit. You can contact [Andrea Hopkins](#) (Business Assistance) with our Public Outreach and Assistance Division to request a permit application at [501-682-0820](tel:501-682-0820) or email hopkins@adeq.state.ar.us .

The above item requires your immediate attention. Please submit a written response to these findings to Ms. Cindy Garner, Water Division Enforcement Branch Manager. The response should be mailed to the address below.

Your response should contain detailed documentation, including photographs, describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by **August 14, 2010**.

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

If I can be of any assistance, please contact me at harmoni@adeq.state.ar.us or 479-968-7339 ext. 14.

Sincerely,

Travis Harmon
District 5 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch

 <p style="text-align: center;">UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Washington, D.C. 20460</p> <h2 style="text-align: center;">NPDES Compliance Inspection Report</h2>	Form Approved OMB No. 2040-0003
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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]	11 12 [1][0][0][7][0][9]	17 18 [W]	19 [S]	20 [2]	
Remarks					
Inspection Work Days: 67 [] [] [] 69 Facility Evaluation Rating: 70 [N] BI: 71 [N] QA: 72 [N] Reserved: 73 [] 74 [] 75 [] 80					

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>) Watts Auto Salvage 1 Oak Hill Lane Greenbrier, AR 72058	Entry Time/Date 10:00/ 7/9/10	Permit Effective Date 7/1/09
	Exit Time/Date 11:15/ 7/9/10	Permit Expiration Date 6/30/14
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Darrell Watts/ Owner/ 501-581-5754	Other Facility Data 35 12 40 N, 92 23 55 W	
Name, Address of Responsible Official/Title/Phone and Fax Number Darrell Watts, Owner 1 Oak Hill Lane Greenbrier, AR 72058 501-581-5754	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)

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

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

I found that the facility was in operation (auto salvage yard) without applying for and obtaining coverage under the general industrial storm water permit. The facility was in operation and I did see customers at the site looking for parts.
 I did not see any significant spills at the site during the inspection.

Name(s) and Signature(s) of Inspector(s) Travis Harmon 	Agency/Office/Telephone/Fax Arkansas Department of Environmental Quality/ Russellville Office/ 479-968-7339/ 479-968-7321	Date 7/30/10
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: Facility has not obtained a permit.	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION B: STORM WATER POLLUTION PREVENTION PLAN EVALUATION	
PERMITTEE SWPPP MEETS PERMIT REQUIRMENTS	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. Pollution Prevention Team	
A. Identify specific individuals	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B. Outline their responsibilities	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2. Description of potential pollutant sources, including:	
A. Site map indicating:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
A1) Drainage areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
A2) Drainage patterns/outfalls	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
A3) Structural and non-structural controls	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
A4) Surface waters	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
A5) Significant materials exposed to precipitation	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
A6) The location of leaks or spills that have occurred in the last 3 years.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
A7) Location of industrial activities exposed to precipitation including:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
i. Fueling stations	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
ii. Vehicle/equipment maintenance or cleaning areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
iii. Loading/unloading areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
iv. Waste treatment, storage, or disposal areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
v. Liquid storage tanks	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
vi. Processing areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
vii. Storage areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B. A list of pollutants likely to be present in the discharges	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
C. Description of significant materials handled, treated, stored, or disposed of such that exposure to storm water occurred in the last 3 years.	
C1). Description of the method and location of storage or disposal	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
C2) Description of all material management practices	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
C3) Description and location of existing structural and non- structural controls	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
D. List of significant spills and leaks that occurred in the 3 years prior to the effective date of this Permit	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
E. Summary of existing storm water sampling data	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
F. Description of areas with a high erosion potential	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
G. A narrative summarizing potential pollutant sources	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. A description of appropriate measures and controls, including:	
A. Good housekeeping procedures	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B. Preventive maintenance procedures	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
C. Spill prevention and response procedures	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
D. Inspection procedures	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
E. Employee training program	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
F. Recordkeeping and internal reporting procedures	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

G. Non-storm water discharge certification	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
H. Identify authorized non-storm water discharges and appropriate controls	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
I. Erosion and sediment controls for areas with a high erosion potential	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
J. A narrative consideration of traditional storm water management practices	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
K. Plans for implementation and maintenance of traditional measures found reasonable and appropriate.	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. Annual Site Compliance Evaluation Reports which include:	
A. A summary of the scope of the inspection	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B. Personnel making the inspection	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
C. Major Observations	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
D. Actions taken to revise the Pollution Prevention Plan	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
E. Certification of compliance or a list of non-compliance incidents	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. If discharging to a large or medium municipal separate storm sewer, compliance with applicable requirements in the municipal storm water management program.	
	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
6. Consistency of the SWPPP with other plans	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. Additional requirements for facilities subject to Emergency Planning and Community Right to Know Act (EPCRA) Section 313 requirements	
A. A description of the measures used in areas where Section 313 water priority chemicals are stored, processed, or otherwise handled to:	
A1) Minimize the potential contact or storm water run-on with the chemicals	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
A2) Prevent exposure of the chemicals to storm water and wind	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B. A discussion of the measures taken to minimize the discharge of Section 313 water priority chemicals from the following areas:	
B1) Liquid storage areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B2) Non-liquid storage areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B3) Truck and railcar loading areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B4) Truck and railcar loading areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B5) Transfer, processing, or handling areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B6) Other areas	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B7) Preventive maintenance and housekeeping	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B8) Facility security	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B9) Training	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B10) Professional Engineer (PE) certification every 3 years	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. Assurance that any salt storage piles present onsite are covered or enclosed	
	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

NPDES Compliance Inspection Report Further Explanation

Complaint received 6/25/10. “Appears to be an unpermitted junk yard west of Greenbrier on Oak Hill Lane. Hundreds of cars (600 +/-) being stored in a field per Google Earth sat photo dated 3/5/2009. Lat/long is approx. 35 12 40 N, 92 23 55 W. No industrial storm water permit has been found for this facility.”

I visited on 7/9/10 and found that the facility was in operation (auto salvage yard) without applying for and obtaining coverage under the general industrial storm water permit. The facility was in operation and I did see customers at the site looking for parts.

I did not see any significant spills at the site during the inspection. One area noted with engines/transmissions on ground and small amount of fluids previously spilled (was not nearby or immediate threat to waters of the state).

Google Earth Image at 35 12 40N, 92 23 55W:



Water Division NPDES Photographic Evidence Sheet							
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Location:	Watts Auto salvage, 1 Oak Hill Lane, Greenbrier.						
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Photographer:	Travis Harmon			Witness:	None		
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Photo #	1	Of	3	Date:	7/9/10	Time:	1036 hr
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Description:	Sign at entrance to facility (Watts Auto Salvage). There is also a sign reading "Auto salvage" posted at the intersection of Oak Hill Lane and Highway 65.						
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Photographer:	Travis Harmon			Witness:	None		
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Photo #	2	Of	3	Date:	7/9/10	Time:	1049 hr
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Description:	Overview of portion of the facility.						
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Water Division NPDES Photographic Evidence Sheet							
Location:	Watts Auto salvage, 1 Oak Hill Lane, Greenbrier.						
Photographer:	Travis Harmon			Witness:	None		
Photo #	3	Of	3	Date:	7/9/10	Time:	1049 hr
Description:	Only area with some small amount of fluids on ground near engines/transmissions.						
							

Ms. Cindy Suran,

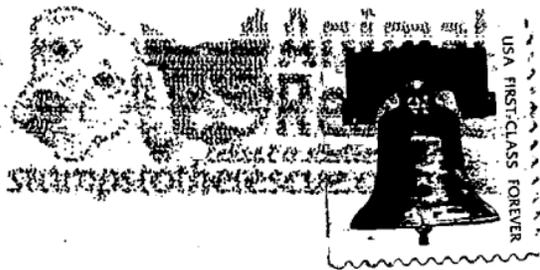
I spoke with Andrea Hopkins on 9 Aug '10. She requested that I submit a letter to you pertaining to a storm water permit. She said she could meet with me on Tuesday, 24 August, @ 1000. She would then inspect and assist with obtaining the permit.

David Watts

Darnell Watts Auto Salvage
4 Oakhill Lane
Greenbrier, AR 72058

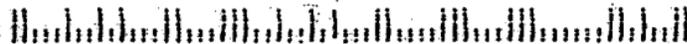
LITTLE ROCK AR 720

10 AUG 2010 PM 3 T



ADEQ
5301 Northshore Drive
North Little Rock, AR 72118-5317
Attn: Cindy Carnes

72118+5317



ADEQ

ARKANSAS
Department of Environmental Quality

August 20, 2010

Darrell Watts
Watts Auto Salvage
1 Oak Hill Lane
Greenbrier, AR 72058

RE: Response to Compliance Inspection

Dear Mr. Watts:

The Department has received your response to the July 9, 2010 routine compliance inspection of your facility by our District Field Inspector, Travis Harmon. Your letter appears to adequately address the discrepancies identified during the visit. However, you must obtain the required permit. The Department assumes the corrective actions taken will be maintained to ensure consistent compliance with the requirements of the permit. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

The Department will keep the inspection and response on file. If future violations occur that require enforcement action, the Department will consider the inspection and response as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires the Department to consider the past history of your site and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any future violations.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0649 or you may e-mail me at sawyer@adeq.state.ar.us.

Sincerely,



Sam Sawyer
Enforcement Coordinator
Water Division Enforcement Branch