



ARKANSAS  
Department of Environmental Quality

June 1, 2011

Michael Karp, Incinerator Manager  
CLEAN HARBORS EL DORADO, LLC  
309 American Circle  
El Dorado, AR 71730

RE: Compliance Inspection

AFIN: 70-00098

NPDES Permit No.: AR0037800

Dear Mr. Karp:

On 5/20/2011, I performed an inspection of the CLEAN HARBORS EL DORADO, LLC 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 the following:

- 1. Records for the facility revealed that the facility flow meter at Outfall 007 was not working correctly. This is a violation of Part III, C, 2 of the permit.**
- 2. Best Management Practices (BMPs) (i.e. housekeeping) were not satisfactory at the contractors' laydown yard. Specifically, empty drums, trash and bags of exposed hydrated lime needed to be removed or covered at this location. This is a violation of Part II, 6 of the permit.**

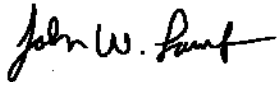
The above items require your immediate attention. Please submit a written response to these findings to Cindy Garner, Branch Manager, of the Water Division Enforcement Branch of this Department. This response should be mailed to the address below. This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response with all necessary detailed documentation (i.e. pictures) is due by June 11, 2011.

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

Page 2

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

Sincerely,

A handwritten signature in black ink that reads "John W. Lamb". The signature is written in a cursive style with a large initial 'J' and a long, sweeping underline.

John W. Lamb  
District 8 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 <b>N</b> 2 <b>5</b> 3 <b>A R 0 0 3 7 8 0 0</b> 11 12 <b>1 1 0 5 2 0</b> 17 18 <b>C</b> 19 <b>S</b> 20 <b>2</b>	Remarks				
Inspection Work Days		Facility Evaluation Rating		BI QA -----Reserved-----	
67		69	70	<b>1</b>	71 <b>N</b> 72 <b>N</b> 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> ) <b>CLEAN HARBORS EL DORADO, LLC</b> <b>309 American Road</b> <b>El Dorado, AR</b>	Entry Time/Date <b>10:25 /5/20/2011</b>	Permit Effective Date <b>10/1/2010</b>
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) <b>Kathy Shoemaker, Senior Compliance Manager, 870-863-7173</b>	Exit Time/Date <b>13:42 /5/20/2011</b>	
Name, Address of Responsible Official/Title/Phone and Fax Number <b>Michael Karp, Incinerator Manager 870-863-7173</b> <b>CLEAN HARBORS EL DORADO, LLC</b> <b>309 American Circle</b> <b>El Dorado, AR 71730</b>	Permit Expiration Date <b>9/30/2015</b>	
Other Facility Data		Contacted Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

### Section C: Areas Evaluated During Inspection

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

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

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

**Section E, 3:** Records for the facility revealed that the facility flow meter at Outfall 007 was not working correctly. Flow sheet for April stated that the flow was only an estimate due to the flow meter being out of service. The facility has already ordered a new meter.

**Section J, 10:** Best Management Practices (BMPs) (i.e. housekeeping) were not satisfactory at the contractors' laydown yard. Trash, empty drums and bags of hydrated lime needed to be removed or covered in this area.

The facility also had a lead excursion in 1<sup>st</sup> quarter 2011, which was reported on the DMR and NCR. The facility has also failed biomonitoring recently from 009. Facility is installing new oil skimmers for ground water oil recovering and had to stop pumping ground water to the treatment plant. A TRE was submitted on May 17, 2011

Name(s) and Signature(s) of Inspector(s)  John W. Lamb	Agency/Office/Telephone/Fax Arkansas Department of Environmental Quality 3400 West. Hillsboro, El Dorado, AR 71730 870-862-0680/ Fax 870-862-3509	Date <b>25 May 2011</b>
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

**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 NE
- 12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: Y N NA NE
- 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 NE
- 15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: Y N NA NE

**SECTION D: SAMPLING**

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS

S M U NA NE

## DETAILS:

1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER PRESERVATION TECHNIQUES USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

**SECTION E: FLOW MEASUREMENT**

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS

S M U NA NEDETAILS: see page 03,

1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE: <u>weir</u>	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> 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) :	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
5. DUPLICATE SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
6. SPIKED SAMPLES ARE ANALYZED $\geq$ 10% OF THE TIME:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
7. COMMERCIAL LABORATORY USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. LAB NAME: <u>Accu Test</u> and <u>Bio-Analytical</u>	
b. LAB ADDRESS: <u>Houston Tx,</u> <u>Doyline La</u>	
c. PARAMETERS PERFORMED: <u>all but pH.....Bio Analytical- Biomonitoring</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE

**SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS**

BASED ON VISUAL OBSERVATIONS ONLY S M U NA NE

DETAILS:

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001, 007	No discharge						
009	None	None	Slight	None	None	Light brown	

**SECTION H: SLUDGE DISPOSAL**

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):	

**SECTION I: SAMPLING INSPECTION PROCEDURES**

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS S M U NA NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TYPE OF SAMPLE: <input type="checkbox"/> GRAB:___ <input type="checkbox"/> COMPOSITE:___ METHOD:___ FREQUENCY:___	
3. SAMPLES PRESERVED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. FLOW PROPORTIONED SAMPLES OBTAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. SAMPLE SPLIT WITH PERMITTEE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

**SECTION J: BEST MANAGEMENT PLAN**

BEST MANAGEMENT PLAN MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS:

1. BMP PLAN UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. POLLUTION PREVENTION TEAM IDENTIFIED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. LIST OF POTENTIAL POLLUTANT SOURCES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. LIST OF STRUCTURAL BMPS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. LIST OF NON-STRUCTURAL BMPS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10. BMPS PROPERLY OPERATED AND MAINTAINED:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. INSPECTIONS CONDUCTED AS REQUIRED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE



**Water Division NPDES Photographic Evidence Sheet**

**Location:** CLEAN HARBORS EL DORADO, LLC

**Photographer:** John W. Lamb      **Witness:** None

**Photo #** 1    **Of** 3      **Date:** 5/20/2011    **Time:** 11:14

**Description:** Bags of hydrated lime at contractors' laydown yard



**Photographer:** John W. Lamb      **Witness:** None

**Photo #** 2    **Of** 3      **Date:** 5/20/2011    **Time:** 11:18

**Description:** Empty drums at laydown yard





**Water Division NPDES Photographic Evidence Sheet**

**Location:** CLEAN HARBORS EL DORADO, LLC

**Photographer:** John W. Lamb      **Witness:** None

**Photo #** 3      **Of** 3      **Date:** 5/20/2011      **Time:** 14:20

**Description:** Photo copy of Outfall 007 flow meter readings for part of April 2011

OUTFALL 007 DAILY FLOW RECORD

Date	Time	Weir Measurement	Railroad Culvert Measurement	Valves Open	D007 Flow Meter Reading	
					Start	End
4-1-11	8:03 <sup>AM</sup>	NO	DISCHARGE			
4-2-11	8:00 <sup>AM</sup>	NO	DISCHARGE			
4-3-11	8:00 <sup>AM</sup>	NO	DISCHARGE			
4-4-11	8:00 <sup>AM</sup>	NO	DISCHARGE			
4-4-11	3:00 <sup>PM</sup>	7 1/2"		B	METER NOT WORKING	
4-5-11	3:00 <sup>PM</sup>	2 1/2"			"	" "
4-6-11	8:00 <sup>AM</sup>	NO	DISCHARGE			
4-7-11	8:00 <sup>AM</sup>	NO	DISCHARGE			
4-8-11	8:00 <sup>AM</sup>	NO	DISCHARGE			
4-9-11	8:00 <sup>AM</sup>	NO	DISCHARGE			
4-10-11	8:00 <sup>AM</sup>	NO	DISCHARGE			
4-11-11	8:00 <sup>AM</sup>	NO	DISCHARGE			



**ENVIRONMENTAL SERVICES®**

Clean Harbors Environmental Services, Inc.  
309 American Circle  
El Dorado, AR. 71730  
www.cleanharbors.com

FedEx – 9792 0858 7147

June 9, 2011

Cindy Garner,  
Branch Manager, Water Division  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
Little Rock, AR 72118-5317

Re: NPDES Permit Number AR0037800  
AFIN: 70-00098; Compliance Inspection

Dear Ms. Garner;

This letter is in response to a letter from the ADEQ to Clean Harbors El Dorado, LLC dated June 1, 2011 regarding alleged violations noted during your inspection on May 20, 2011. All issues have been corrected.

Specifically, a new flow meter has been installed. A back up meter has been placed in the spare parts inventory to ensure that if quick repairs cannot be made then a replacement is readily available.

Additionally, the items noted in the contractors' yard were all removed. The mandatory requirement of better housekeeping practices in the contractor's yard have been brought to our contractor's attention. They have committed to us to maintain the yard such that there is no run off of potential pollutants into the stormwater

The work order for the replacement of the meter, pictures of the new meter and of the contractor's yard are all attached as documentation of corrections. If you have any questions or need additional information please do not hesitate to contact me at (870) 863-7173.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Shoemaker", with a long horizontal line extending to the right.

Kathy Shoemaker  
Senior Compliance Manager

Enclosures:

Cc: J. Lamb, ADEQ  
R Hines CHEL  
S Kuhn, CHES







<b>Work Order</b>	94202 (EL) Install Flow Meters @ 007 Out Flow -WWTP	<b>Scheduled Start Date</b>	04/28/2011
<b>Status</b>	Closed	<b>WO Type</b>	BRKD
<b>Parent Work Order</b>		<b>Class</b>	COMPLNCE
<b>Department</b>	I - E Instrumentation & Electrical	<b>Priority</b>	6
<b>PM Code</b>		<b>Warranty</b>	N
<b>Cost Code</b>		<b>Safety</b>	N
<b>Problem Code</b>		<b>Equip Criticality</b>	
<b>Reported By</b>		<b>Assigned To</b>	
		<b>Assigned By</b>	
<b>Standard WO</b>			
<b>Equipment</b>	168RTA010 (EL)	POND,RETENTION AREA #010. LOCATED NORTH OF WWTP	
<b>Location</b>			
<b>Equipment</b>		<b>Estimated Hours</b>	2
<b>Manufacturer</b>			
<b>Equipment Model</b>		<b>Estimated Cost</b>	3,829.73
<b>Equipment Serial Number</b>		<b>Actual Cost</b>	11,576.15
<b>Date Started</b>	05/02/2011	<b>Date Completed</b>	05/05/2011

Activities					
Activity	Trade	Est. Hours	People Req.	Task	Description
501	I-E	2	1		
502	VENDOR SUPPLIED	0	1		
503	VENDOR SUPPLIED	0	1		
504	VENDOR SUPPLIED	0	1		
505	VENDOR SUPPLIED	0	1		

# FEDEX

# Express

RT 178 1 A  
FZ 177 7147 06.10

ORIGIN ID: ELDA (870).863-7173  
KATHY SHOEMAKER  
CLEAN HARBORS  
309 AMERICAN CIRCLE

SHIP DATE: 09JUN11  
ACTWGT: 0.5 LB MAN  
CAD: 0224857/CAFE2472

EL DORADO, AR 717306554  
UNITED STATES US

BILL SENDER

TO **CINDY GARNER**  
**ADEQ - WATER DIVISION**  
**5301 NORTHSHORE DRIVE**

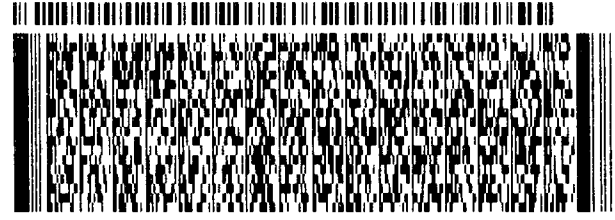
**NORTH LITTLE ROCK AR 721185317**

(501) 682-0744

REF:

THU:  
PO:

DEPT:



FedEx  
Express

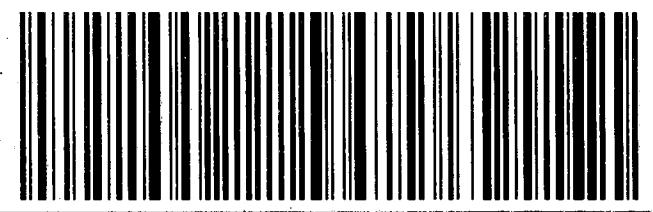


**FRI - 10 JUN A4**  
**STANDARD OVERNIGHT**

TRK# 9792 0858 7147  
0201

**X2 LITA**

**72118**  
**AR-US**  
**MEM**



*The World*

# Envelope

Align bottom of Peel and Stick Airbill or Pouch here.

# ADEQ

ARKANSAS  
Department of Environmental Quality

June 27, 2011

Clean Harbors Environmental Services, Inc.  
Attention: Michael Karp  
309 American Circle  
El Dorado, AR 71730

RE: NPDES Permit AR0037800, AFIN 70-00098

Dear Mr. Karp:

The Department has received your response to the 05/20/2011 inspection of your facility by our District Field Inspector, John W. Lamb. The information submitted satisfactorily addresses the concerns of the Department. The Department expects 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. If you have any questions, please call 501-682-0631 or e-mail [meints@adeq.state.ar.us](mailto:meints@adeq.state.ar.us).

Sincerely,



Rene' E. Meints  
Enforcement Analyst  
Water Division Enforcement Branch