

December 21, 2012

Mr. Stephen Murphy, General Manager ANTHONY FOREST PRODUCTS COMPANY P.O. Box 724 Strong, AR 71765

RE: Compliance Inspections

AFIN: 70-00473, NPDES Permit Nos.: ARR000977 and AR0047384

Dear Mr. Murphy:

On November 26, 2012, I performed a routine compliance inspection and a routine storm water inspection of the above referenced 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 facility was in compliance at the time of the inspections.

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

9	E P A									Form Approved OMB No. 2040-0003
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY										
NPDES Compliance Inspection Report										
	NPDE	<u>s (</u>	on	ipliand	e Insp	ectio	n J	Report		
					Section A: Na	ational Da	ta Sy	ystem Coding		
1 N 2 5 3 A R R 0 0 0 9 7 7 11 12 1 2 1 1 2 6 17 18							Ins	pec. Type Inspector Fac. Type W 19 S 20 2		
						Remar	KS			
	Inspection Work Days]	Facility	Evaluation I	Rating	BI	(QA	<u>-</u>	Reserved
	67 69		7	0 3		71 N	72	N 73 74 75		80
					Secti	on B: Fac	ility	Data		
Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)							Entry Time/Date 13:10/ 11/26/2012		Permit Effective Date 05/21/2012	
ANTHONY FOREST PRODUCTS COMPANY 1236 Urbana Road Urbana, AR								Exit Time/Date 14:00/ 11/26/2012		Permit Expiration Date 6/30/2014
								er Facility Data PS# 069371		
Name, Address of Responsible Official/Title/Phone and Fax Number Stephen Murphy, General Manager, 870-942-3206 ANTHONY FOREST PRODUCTS COMPANY P.O. Box 724 Strong, AR 71765					ber		Contacted Yes □ No ☑			
			(2					I uring Inspection isfactory, N = Not Evaluated)		
S	Permit	N	Flov	v Measureme	ent	S	Op	erations & Maintenance	N	Sampling
S	Records/Reports	N	Self-	Monitoring 1	Program	N	Slu	dge Handling/Disposal	N	Pollution Prevention
S	Facility Site Review	N	Con	ipliance Sche	edules	N	Pre	etreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Lab	oratory		S	Sto	orm Water		Other:
								tach additional sheets if necessar		
	e records review was not cond nducted on 10 December 2012.		d at ti	me of inspe	ction due to	Mr. Kel	ly O	lliver, EHS Coordinator, bein	ıg off	. The records review was
	ction C and D: The facility did May 2012. The facility was no									ot receive permit coverage until
Nar	ne(s) and Signature(s) of Inspector(s	(3)			Agency/Off	fice/Telent	10ne/	/Fax		Date
John W. Lamb				Agency/Office/Telephone/Fax Arkansas Department of Environmental Quality						
John W. Land				3400 West Hillsboro El Dorado, AR 71730 870-862-0680 fax 870-862-3509				20 December 2012		
Signature of Reviewer				Agency/Office/Phone and Fax Numbers					Date	

Inspection Form Legend: S = Satisfactory, M = Marginal, U = Unsatisfactory, Y = Yes, N = No, NI = Not Implemented, NA = Not Applicable, NE = Not Evaluated -If Y and a NI are check it means it is in the SWPPP but not implemented in the field which is a violation. SECTION A: PERMIT VERIFICATION PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS ☑S □M □U □NA □NE 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 ☑Y □N □NA □NE 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: ☑Y □N □NA □NE 4. ALL DISCHARGES ARE PERMITTED: Comments:

SECTION B: STORM WATER POLLUTION PREVENTION PLAN EVALUATION	
PERMITTEE SWPPP MEETS PERMIT REQUIRMENTS	ØS □M □U □NA □NE
1. Is the SWPPP available for review by ADEQ? (Part 4.2)	☑Y □N □NI □NA □NE
2. Does the SWPPP contain facility name, general permit tracking number, facility physical address, and SIC and NAICS codes? (Part 4.6.1)	☑Y □N □NI □NA □NE
3. Pollution Prevention Team	
A. Does the SWPPP identify specific individuals or positions?(Part 4.6.2)	☑Y □N □NI □NA □NE
B. Does the SWPPP outline the responsibilities of each member of the Pollution Prevention Team? (Part 4.6.2)	☑Y □N □NI □NA □NE
4. Does the SWPPP contain a facility description (process diagram, general layout, storage of raw materials, the flow of goods and materials through the facility and seasonal variations)? (Part 4.6.3)	MY □N □NI □NA □NE
5. Does the facility site map contain the following items?	
A) The size of the property in acres? (Part 4.6.4.a)	☑Y □N □NI □NA □NE
B) The location and extent of significant structures and impervious surfaces? (Part 4.6.4.b)	☑Y □N □NI □NA □NE
C) The direction of stormwater flow using arrows? (Part 4.6.4.c)	☑Y □N □NI □NA □NE
D) The locations of all existing structural control measures? (Part 4.6.4.d)	☑Y □N □NI □NA □NE
E) The locations of all receiving wasters in the immediate vicinity of the facility? (Part 4.6.4.e)	☑Y □N □NI □NA □NE
F) The locations of all stormwater conveyances including ditches, pipes, and swales? (Part 4.6.4.f)	☑Y □N □NI □NA □NE
G) The locations of potential pollutant sources? (Part 4.6.4.g)	☑Y □N □NI □NA □NE
H) The locations of all stormwater monitoring points? (Part 4.6.4.h)	☑Y □N □NI □NA □NE
 The locations of stormwater inlets and outfalls with unique identification code for each outfall with indications if one or more outfall is being treated as "substantially identical" and an approximate outline of the areas draining to each outfall? (Part 4.6.4.i) 	ØY □N □NI □NA □NE
J) Where the stormwater discharges to municipal separate storm sewer system (MS4), if applicable? (Part 4.6.4.j)	□Y □N □NI ☑NA □NE
K) The locations and descriptions of all non-stormwater discharges identified in the SWPPP? (Part 4.6.4.k)	☑Y □N □NI □NA □NE
L) The locations of the following activities if they are exposed to precipitation? (Part 4.6.4.I)	☑Y □N □NI □NA □NE
Fueling Stations	☑Y □N □NI □NA □NE
Vehicle and equipment maintenance and/or cleaning areas	☑Y □N □NI □NA □NE
Loading and unloading areas	☑Y □N □NI □NA □NE
Locations used for the treatment, storage, or disposal of waste	☑Y □N □NI □NA □NE
Liquid storage tanks	☑Y □N □NI □NA □NE
Processing and storage areas	☑Y □N □NI □NA □NE
Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-byproducts used or created by the facility	☑Y □N □NI □NA □NE
Transfer areas for substances in bulk	☑Y □N □NI □NA □NE
Machinery	☑Y □N □NI □NA □NE
M) The locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants? (Part 4.6.4.m)	□Y □N □NI ☑NA □NE

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6. A de:	scription of potential pollutant sources			
an	An inventory of industrial activities which hounts of pollutants? (Part 4.6.5.1)		<u> </u>	ÍY □N □NI □NA □NE
pr	An inventory of all types of materials handlecipitation? (Part 4.6.5.2)		<u> </u>	ĬY □N □NI □NA □NE
are	A list of significant spills and significant lease exposed to precipitation or drained to a ective date of the permit. (Part 4.6.5.3)			ĬY □N □NI □NA □NE
D)	A summary of existing discharge sampling	data (Part 4.6.5.4)	₹	Y ON ON ONA ONE
E)	Risk Identification and Summary of Potentia	l Pollutant Sources (Part 4.6.5.5)	₹	ĬY □N □NI □NA □NE
7. Meas	sures and Controls –SWPPP must describe h	ow these are used.	·	
A)	Best Management Practices (BMPs) (Part	4.6.6.1)	₹	ĬY □N □NI □NA □NE
В)	Exposure Minimization (Part 4.6.6.2)		₹	Y ON ONI ONA ONE
C)	Good Housekeeping (Part 4.6.6.3)		₹	ĬY □N □NI □NA □NE
D)	Preventative Maintenance (Part 4.6.6.4)		₹	ĬY □N □NI □NA □NE
E)	Spill Prevention and Response Procedures	s (Part 4.6.6.5)	₹	ĨY □N □NI □NA □NE
F)	Employee Training Procedures (Part 4.6.6.	6)	₹	Y ON ONI ONA ONE
G)	Erosion and Sediment Control (Part 4.6.6.7	<u>, </u>	₹	Y ON ONI ONA ONE
H)	Management of Run-on and Runoff (Part 4.	, ,6,6,8)		Y ON ONI ONA ONE
) I)	Additional Requirements for Salt Storage (•		Y ON ON ONA ONE
	orized Non-stormwater Discharges (Part 4.6.			Y ON ONI ONA ONE
	uations and Inspections (Part 4.6.10)	.,		
	Visual Site Inspections (minimum 4/year) (Part 4.6.10.1)	₩	Y ON ONI ONA ONE
	At least one visual inspection conducted d			Y □N □NI ☑NA □NE
	Inspections recorded and include: date of		r observations	
	and corrective actions required.		Į.	ĨY □N □NI □NA □NE
В)	Comprehensive Site Compliance Evaluation	n (Annual) (Part 4.6.10.2)		ĬY □N □NI □NA □NE
Comm				
SECT	ION C: MONITORING			
	ITTEE MONITORING MEETS PERMI			IS □M □U □NA □NE
	e facility one of the four Effluent Guideline Fa coal pile, or Paving and Roofing Materials)(I	Part 3.1.1)]Y ⊠N □NI □NA □NE
A)		• , , ,	<u> </u>	Y ON ONI ONA MINE
	If coal pile run off is monitored, are all other			Y □N □NI ØNA □NE
2 Which	n of the monitoring categories is this facility	subject to: (Part 3.3)		
A)	Are samples being collected for each semi	-annual monitoring period (Part 3.5)		Y □N □NI ØNA □NE
В)	Are samples being collected from the local	tion specified in the NOI and SWPPP (Part	3.6)	IY □N □NI ØNA □NE
C)	Has the permittee determined that some of	the outfalls are similar? (Part 3.7.1)		ĭy □n □ni □na □ne
	Are the conditions on the ground still the s	same as documented for the similar outfall		ĬY □N □NI □NA □NE
D)	Are all parameters for the monitoring categ	gory being sampled and analyzed? (Part 3.	7.2)	Y □N □NI ØNA □NE
E)	Were the samples collected during a meas	ureable storm event? (Part 3.7.2.b)		IY □N □NI ØNA □NE
F)	Were the samples properly preserved and	analyzed? (Part 3.7.2)		IY □N □NI ØNA □NE
G)	Are the sample locations suitable for the c	ollection of a representative sample? (Part	3.3)	Y □N □NI ØNA □NE
	any of the monitoring revealed an exceedanc	<u>-</u>		Y □N □NI ØNA □NE
3.11.2)	Has a process to develop a corrective action		` _]Y □N □NI ØNA □NE
permitte	If four monitoring periods have passed wit e requested a reduction in monitoring? (Par	and the second s	, has the]Y □N □NI ☑NA □NE
Comm	ents:			

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SECTION D: RECORD KEEPING AND REPORTING	
PERMITTEE RECORD KEEPING AND REPORTING MEETS PERMIT REQUIRMENTS	OS OM OU MA ONE
	LIS LIM LIO MINA LINE
1. Have DMRs for the previous year of monitoring been submitted to ADEQ and is a copy in the file? (Part 3.12.3.a)	□Y □N □NI ☑NA □NE
Are the DMRs properly completed?	□Y □N □NI ØNA □NE
Does the permittee have copies of lab reports and chain of custody records?	□Y □N □NI ☑NA □NE
Are the appropriate records of the measureable storm event and sampling being kept? (Part 3.7.2.e)	□Y □N □NI ØNA □NE
2. Has a copy of the annual comprehensive evaluation been submitted to the agency and is a copy on file? (Part 3.12.3.b)	☑Y □N □NI □NA □NE
3. Is permittee keeping copies of inspections and corrective actions on file? (Part 4.6.10.1)	□Y □N □NI ØNA □NE
4. Are copies of training records being kept on file? (Part 4.6.6.6)	☑Y □N □NI □NA □NE
5. Is there a list of significant spills and leaks being maintained? (Part 4.6.5.3)	☑Y □N □NI □NA □NE
SECTION F. FACILITY TOUR	
SECTION E: FACILITY TOUR	
SECTION E: FACILITY TOUR PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS	ØS □M □U □NA □NE
	☑S □M □U □NA □NE ☑Y □N □NI □NA □NE
PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS	
PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS 1. Any evidence of spills or leaks that have not been properly cleaned up as required by the SWPPP?	☑Y □N □NI □NA □NE
PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS 1. Any evidence of spills or leaks that have not been properly cleaned up as required by the SWPPP? 2. Any evidence of erosion or un-stabilized ground?	☑Y □N □NI □NA □NE ☑Y □N □NI □NA □NE
PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS 1. Any evidence of spills or leaks that have not been properly cleaned up as required by the SWPPP? 2. Any evidence of erosion or un-stabilized ground? 3. Any controls, structures, or storage areas that are not as identified in the SWPPP? 4. Any non-stormwater discharges not identified in the SWPPP? (see Part 1.7 of permit for list of allowable	☑Y □N □NI □NA □NE ☑Y □N □NI □NA □NE ☑Y □N □NI □NA □NE
PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS 1. Any evidence of spills or leaks that have not been properly cleaned up as required by the SWPPP? 2. Any evidence of erosion or un-stabilized ground? 3. Any controls, structures, or storage areas that are not as identified in the SWPPP? 4. Any non-stormwater discharges not identified in the SWPPP? (see Part 1.7 of permit for list of allowable non-stormwater discharges) 5. Any non-stormwater discharges that are not allowed under this permit? (see Part 1.7 of permit for list of	ØY □N □NI □NA □NE
PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS 1. Any evidence of spills or leaks that have not been properly cleaned up as required by the SWPPP? 2. Any evidence of erosion or un-stabilized ground? 3. Any controls, structures, or storage areas that are not as identified in the SWPPP? 4. Any non-stormwater discharges not identified in the SWPPP? (see Part 1.7 of permit for list of allowable non-stormwater discharges) 5. Any non-stormwater discharges that are not allowed under this permit? (see Part 1.7 of permit for list of allowable non-stormwater discharges)	☐Y □N □NI □NA □NE
PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS 1. Any evidence of spills or leaks that have not been properly cleaned up as required by the SWPPP? 2. Any evidence of erosion or un-stabilized ground? 3. Any controls, structures, or storage areas that are not as identified in the SWPPP? 4. Any non-stormwater discharges not identified in the SWPPP? (see Part 1.7 of permit for list of allowable non-stormwater discharges) 5. Any non-stormwater discharges that are not allowed under this permit? (see Part 1.7 of permit for list of allowable non-stormwater discharges) 6. Are BMPs being properly operated and maintained? (Part 6.1)	ØY □N □NI □NA □NE ØY □N □NI □NA □NE