

ADEQ

ARKANSAS
Department of Environmental Quality

February 10, 2016

Greg Carman, President
Carman Inc.
PO Box 6424
Fort Smith, AR 72908

RE: Carman, Inc. Inspection (Sebastian Co)
AFIN: 66-00495 **NPDES Permit No.: ARR00A741**

Dear Mr. Carman:

On January 20, 2016 I performed an Industrial Stormwater 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. A copy of the inspection report is enclosed for your records.

Please refer to the “Summary of Findings” section of the attached inspection report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. 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 necessary documentation (i.e., photos) is due by **February 24, 2016**.

If I can be of any assistance, please contact me at sullivana@adeq.state.ar.us or (479) 474-0333.

Sincerely,



Alana Sullivan
District 4 Field Inspector
Water Division

ADEQ ARKANSAS Department of Environmental Quality		WATER DIVISION INSPECTION REPORT			
		AFIN: 66-00495	PERMIT #: ARR00A741	DATE: 1/20/2016	
		COUNTY: 66 Sebastian	PDS #: 089016	MEDIA: WN	
		GPS LAT: 35.319717 LONG: -94.423050 LOCATION: General Area			
FACILITY INFORMATION		INSPECTION INFORMATION			
NAME: Carman, Inc. LOCATION: 6705 Hwy 271 South CITY: Fort Smith		FACILITY TYPE: 2 - Industrial INSPECTOR ID#: 111784 S - State			
		FACILITY EVALUATION RATING: N INSPECTION TYPE: Industrial Stormwater			
		DATE(S): 1/20/2016 ENTRY TIME: 13:45 EXIT TIME: 14:20 PERMIT EFFECTIVE DATE: 7/1/2014 PERMIT EXPIRATION DATE: 6/30/2019			
RESPONSIBLE OFFICIAL		FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N			
NAME: / TITLE Greg Carman / President COMPANY: Carman Inc. MAILING ADDRESS: PO Box 6424 CITY, STATE, ZIP: Fort Smith AR 72908 PHONE & EXT: / FAX: 479-646-8486 / EMAIL: greg@carmaninc.com		INSPECTION PARTICIPANTS			
CONTACTED DURING INSPECTION: Yes		NAME/TITLE/PHONE/FAX/EMAIL/ETC.:			
AREA EVALUATIONS (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
**	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
**	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	**	PRETREATMENT
U	OTHER: No-Exposure Exclusion				
SUMMARY OF FINDINGS					
The following items violate Part 1.7 of the general permit and 40 CFR 122.26(g):					
<ol style="list-style-type: none"> 1. Use of industrial machinery or equipment and areas where residuals from use of machinery or equipment are exposed to stormwater. 2. Residuals from spills/leaks were noted on the ground and exposed to stormwater. 3. Materials or products are stored outside where they are exposed to stormwater. 4. Waste materials are exposed to stormwater. 					
The facility is currently permitted for a No-Exposure Exclusion Industrial Stormwater General Permit. During the inspection, it was revealed that the site is not eligible for the No-Exposure Exclusion in its current state. This is a violation of Part I, 1.7. of the general permit. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the No-Exposure Exclusion. All items above must be addressed to maintain the No-Exposure Exclusion status. Failure to do so will result in the facility having to comply with all conditions outlined in the general permit. Please contact the Permits Branch of the Water Division (telephone: 501-682-0620) for additional information.					

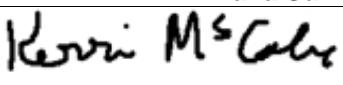
GENERAL COMMENTS

Mr. Carman met with me during the inspection.

Residual from a spill/leak was noted at the entrance to the maintenance shop. Mr. Carman stated it would be cleaned up the day of the inspection. A fuel and DEF tank are located on the south-side of the building. The fuel tank is surrounded by a secondary containment berm. Mr. Carman reports no spills or leaks have occurred. There are several empty trailers being stored onsite.

On the northwest-side of the building is a holding area for old vehicle parts, empty tanks, and used oil. These materials are all exposed to stormwater. The used oil container was not labeled. Mr. Carman had an employee label it while I was onsite.

A used antifreeze container was noted on the south-side of the building and exposed to stormwater. It was also not labeled. An open dumpster was also located on this side. Mr. Carman was encouraged to keep the lid closed on the dumpster.

INSPECTOR'S SIGNATURE: 	Alana Sullivan	DATE: 1/26/2016
SUPERVISOR'S SIGNATURE: 	Kerri McCabe	DATE: 2/9/2016

No-Exposure Exclusion Verification

Are any of the following materials or activities exposed to precipitation now or in the foreseeable future?

Answering "Yes" to any of these questions indicates the facility is not eligible for the No-Exposure Exclusion.

a. Using, storing, or cleaning industrial machinery or equipment and areas where residuals from using, storing, or cleaning industrial machinery or equipment remain and are exposed to stormwater? Y .. N

Comments: Old vehicle parts waiting recycling.

b. Are materials or residuals on the ground or in stormwater inlets from spills/leaks? Y .. N

Comments: Leak/spill at maintenance door entrance.

c. Are materials or products from past industrial activity exposed? .. Y N

Comments:

d. Is material handling equipment exposed except adequately maintained vehicles? .. Y N

Comments:

e. Are materials or products during loading/unloading or transporting activities exposed? .. Y N

Comments:

f. Materials or products stored outdoors except final products intended for outside use (e.g., new cars) where exposure to stormwater does not result in the discharge of pollutants? Y .. N

Comments: Used metal parts and empty propane tanks in parking lot.

g. Materials contained in open, deteriorated, or leaking storage drums, barrels, tanks, and similar containers? .. Y N

Comments:

h. Materials or products handled/stored on roads or railways owned or maintained by the discharger? .. Y N

Comments:

i. Waste materials exposed except waste in covered, non-leaking containers (e.g., dumpsters)? Y .. N

Comments: Used oil and antifreeze containers are uncovered and exposed to stormwater.

j. Application or disposal of process wastewater unless otherwise permitted? .. Y N

Comments:

k. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater outflow? .. Y N

Comments:

General Comments:

Water Division Photographic Evidence Sheet

Location:	Carman, Inc.			
Photographer:	Alana Sullivan	Date:	1/20/2016	Time: 13:54
Witness:	Greg Carman			Photo #: 1
Description:	Residual from spill/leak.			



Photographer:	Alana Sullivan	Date:	1/20/2016	Time: 13:55
Witness:	Greg Carman			Photo #: 2
Description:	DEF tank; fuel tank with berm behind it.			



Water Division Photographic Evidence SheetLocation: **Carman, Inc.**Photographer: **Alana Sullivan**Date: **1/20/2016**Time: **13:56**Witness: **Greg Carman**Photo #: **3**Description: **Fuel tank with berm.**Photographer: **Alana Sullivan**Date: **1/20/2016**Time: **13:57**Witness: **Greg Carman**Photo #: **4**Description: **Empty trailers being stored onsite.**

Water Division Photographic Evidence Sheet

Location:	Carman, Inc.		
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Witness:	Greg Carman	Time:	14:02
Description:	Old vehicle parts, metal, empty tanks, and used oil.		



Photographer:	Alana Sullivan	Date:	1/20/2016	Time:	14:09
Witness:	Greg Carman			Photo #:	6
Description:	Used antifreeze; not labeled.				



Water Division Photographic Evidence Sheet

Location:	Carman, Inc.			
Photographer:	Alana Sullivan	Date:	1/20/2016	Time: 14:09
Witness:	Greg Carman			Photo #: 7
Description:	Open dumpster.			



Figure 1. Google Earth image dated Oct 5, 2013 of view of Carman, Inc.



From: [Greg Carman](#)
To: [Water-Inspection-Report](#)
Cc: [McCabe, Kerri](#); [Sullivan, Alana](#)
Subject: Carman, Inc. AFIN: 66-00495 Corrective Actions
Date: Thursday, February 11, 2016 3:30:54 PM
Attachments: [ARR00A741_inspW_20160120.pdf](#)
[Carman Inspection Corrections 02112016.pdf](#)
Importance: High

Carman, Inc. AFIN: 66-00495 NPDES Permit: ARR00A741

Attached is original inspection report and my submission for corrective actions on the noted deficiencies. Please advise if I may do further in this matter.

With Kind Regards,

Greg

Gregory Carman
President
Carman, Inc.
Email greg.carman@carmaninc.com
Office (479) 646-8486
Mobile (479) 883-2101
Fax (479) 646-7984

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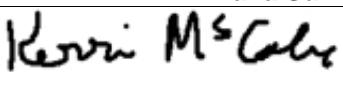
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Comments: Old vehicle parts waiting recycling.

b. Are materials or residuals on the ground or in stormwater inlets from spills/leaks? Y .. N

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c. Are materials or products from past industrial activity exposed? .. Y N

Comments:

d. Is material handling equipment exposed except adequately maintained vehicles? .. Y N

Comments:

e. Are materials or products during loading/unloading or transporting activities exposed? .. Y N

Comments:

f. Materials or products stored outdoors except final products intended for outside use (e.g., new cars) where exposure to stormwater does not result in the discharge of pollutants? Y .. N

Comments: Used metal parts and empty propane tanks in parking lot.

g. Materials contained in open, deteriorated, or leaking storage drums, barrels, tanks, and similar containers? .. Y N

Comments:

h. Materials or products handled/stored on roads or railways owned or maintained by the discharger? .. Y N

Comments:

i. Waste materials exposed except waste in covered, non-leaking containers (e.g., dumpsters)? Y .. N

Comments: Used oil and antifreeze containers are uncovered and exposed to stormwater.

j. Application or disposal of process wastewater unless otherwise permitted? .. Y N

Comments:

k. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater outflow? .. Y N

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Water Division Photographic Evidence Sheet

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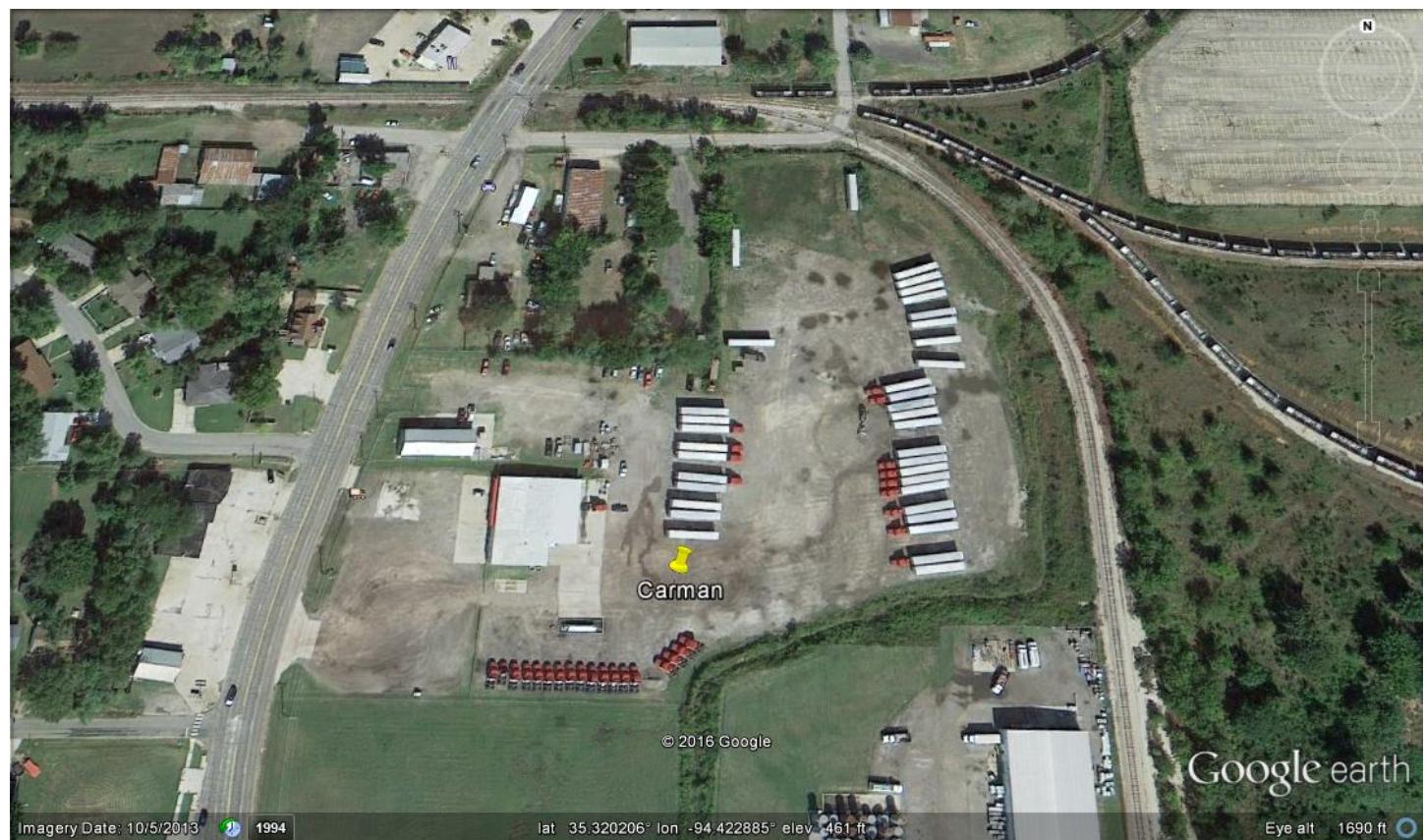


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Witness:	Greg Carman			Photo #: 7
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Figure 1. Google Earth image dated Oct 5, 2013 of view of Carman, Inc.



**Carman, Inc. Response and Corrective Actions for Deficiencies from
January 20, 2016 Site Inspection**

Inspection Report: **Carman, Inc.**, AFIN: **66-00495**, Permit #: **ARR00A741**

a. Using, storing, or cleaning industrial machinery or equipment and areas where residuals from using, storing, or cleaning industrial machinery or equipment remain and are exposed to stormwater? **X Y "N**

Comments: **Old vehicle parts waiting recycling.**

Corrective Action: **Salvage parts were gathered and conveyed to recycling center. Going forward, any parts will be taken to recycling often and strictly kept covered until that time. This procedure communicated to all personnel and management will insure future compliance. Image of area after correction:**



b. Are materials or residuals on the ground or in stormwater inlets from spills/leaks? **X Y "N**

Comments: **Leak/spill at maintenance door entrance.**

Corrective Action: **Spill was cleaned up at time of inspection. Going forward, any spills will be immediately cleaned up. This procedure communicated to all personnel.**

c. Are materials or products from past industrial activity exposed? **"Y XN**

Comments:

d. Is material handling equipment exposed except adequately maintained vehicles? **"Y XN**

Comments:

e. Are materials or products during loading/unloading or transporting activities exposed? **"Y XN**

Comments:

f. Materials or products stored outdoors except final products intended for outside use (e.g., new cars) where exposure to stormwater does not result in the discharge of pollutants? **XY "N**

Comments: **Used metal parts and empty propane tanks in parking lot.**

Corrective Action: **Salvage parts were gathered and conveyed to recycling center. Going forward, any parts will be taken to recycling often and strictly kept covered until that time. This procedure communicated to all personnel and management will insure future compliance. Image during correction:**

g. Materials contained in open, deteriorated, or leaking storage drums, barrels, tanks, and similar containers?

"Y XN

Comments:

h. Materials or products handled/stored on roads or railways owned or maintained by the discharger? XN
Comments:

i. Waste materials exposed except waste in covered, non-leaking containers (e.g., dumpsters)? XN

Comments: **Used oil and antifreeze containers are uncovered and exposed to stormwater.**

Corrective Action: **Used antifreeze tote was unlabeled by back door outside. The tote was labeled and moved inside away from potential exposure where it will remain. Dumpster covers will be closed at all times when not actively being used. Images during correction:**



j. Application or disposal of process wastewater unless otherwise permitted? XN

Comments:

k. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e., under an air quality control permit) and evident in the stormwater outflow? XN

Corrections submitted by:

Gregory Carman

President

February 11, 2016



A R K A N S A S
Department of Environmental Quality

March 3, 2016

Greg Carman
Carman Inc.
PO Box 6424
Fort Smith, AR 72908

**RE: Response to Inspection (Sebastian Co)
AFIN: 66-00495 NPDES Permit No.: ARR00A741**

Dear Mr. Carman:

I have reviewed the response pertaining to my January 20, 2016 inspection of the above-referenced facility. The information provided sufficiently addresses the violations referenced in my inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

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 (479) 424-0333 or you may e-mail me at sullivan@adeq.state.ar.us.

Sincerely,

Well -

Alana Sullivan
District 4 Field Inspector
Water Division