

June 1, 2016

Matt Yost, Senior V.P. Terminalling and Engineering Martin Operating Partnership LP 484 East 6th Street Smackover, AR 71762

RE: Martin Operating Partnership Inspections (Union Co) AFIN: 70-00039 Permit No.: AR0000591 ARR001516 ARR154674

Dear Mr. Yost:

On May 4 and 5, 2016, I performed a Compliance Evaluation Inspection, Industrial Stormwater Inspection, and Construction 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. Copies of the inspection reports are enclosed for your records.

Please refer to the "Summary of Findings" section of each of the attached inspection reports 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 <u>Water-Inspection-Report@adeq.state.ar.us</u>. 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 June 15, 2016.

If I can be of any assistance, please contact me at <u>youngm@adeq.state.ar.us</u> or (501) 837-2073.

Sincerely,

Michael Young District 8 Field Inspector Water Division

				-					
		WATER	DIVISION INSPECTION REPORT						
				ERMIT #: AR000)591	C	DATE: 5/4/2016		
			PDS	#: 091020		MEDIA: WN			
	partment of Environmental Quality	GF	S LAT: 33.36428	7 LONG: -92.717	744 L	OCATION: E	ntrance	e	
	FACILITY INFORMAT	ION				TION INFORM	IOITAN	N	
NAME: Martin Operating Partnership				FACILITY TYPE: 2 - Industrial	101	531 S - State			
	4 East 6th Street			FACILITY EVALUATION RATIN 4 - Satisfactory				Evaluation	
Sm	nackover, AR 71762			()	TRY TIME:	EXIT TIME: 16:30		FECTIVE DATE:	
	RESPONSIBLE OFFIC	CIAL	-		9:00	16:45	2/1/20 PERMIT EX	VI 3 (PIRATION DATE:	
	e / TITLE		d Engineering	0,0,2010	0.00		1/31/2	2018	
COMF	tt Yost / Senior V.P. Terminalling	j an	a Engineering	FAYETTEVILLE	SHAL	E RELATED:	N		
	Irtin Operating Partnership LP			FAYETTEVILLE	SHAL		IS: N		
	4 East 6th Street			INSPECTION PARTICIPANTS					
- /	state, zip: 1ackover AR 71762			NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Jim Dodson/Senior Environmental Coordinator/870-					
	ICCOVELAR / 1/02 NE & EXT: / FAX:			864-7550/jim.dodson@martinmlp.com					
	0-881-8700 /								
EMAIL									
CC	NTACTED DURING INSPECTION:	No							
			AREA EVA						
S	(s=s: PERMIT	atistac S	FLOW MEASUF	tisfactory, N=Not Applicable/Evaluated) REMENT N STORMWATER					
S	RECORDS/REPORTS	S	LABORATORY		S	FACILITY S		VIEW	
Μ	OPERATION & MAINTENANCE	U	EFFLUENT/REC	CEIVING WATER	S	SELF-MONI	TORIN	G PROGRAM	
Μ	SAMPLING	S	SLUDGE HAND	LING/DISPOSAL	Ν	PRETREAT	MENT		
**	OTHER:								
			SUMMARY C						
	There was a discharge of visible	she	en at Outfall 003	3 during the insp	ectior	n. This is a vi	olation	of permit	
COI	ndition Part IA.								
	Samples analyzed for pH and Dispermit condition Part III. (C.) (3.).	ssol	lved Oxygen hav	e violated hold t	imes o	of 15 minutes	. This	is a violation	

3.) The thermometer in the composite sampler had no indication of last calibration date. This is a violation of permit condition Part III. (C.) (3.).

GENERAL COMMENTS

On May 4, 2016 I performed a Compliance Evaluation Inspection at Martin Operating Partnership LP in Smackover, AR. I returned on May 5, 2016 and performed an inspection on the laboratory. During the inspection I observed sheen at Outfall 003 (see Photos 1-2). I also observed that the composite sampler thermometer had no indication of the last calibration date (see Photo 3). All treatment units were in operation at the time of inspection, and I did not observe any violations other than those noted.

The facility has a very high Ammonia-Nitrogen concentration monthly average limit, which have caused numerous effluent violations. A CAO has been issued for violations related to unpermitted discharges caused by high rain events and the CAO may be modified to take into account the ammonia violations. The facility has researched Moving Bed Biofilm Reactors (MBBRs) as a new treatment option and is proposing an install of three (3) units.

The laboratory only had an issue with collecting a sample and analyzing it for pH and Dissolved Oxygen (DO) within the 15-minute holding time (see Photo 4). Calibration is being performed on all devices, but it is recommended to calibrate the DO and pH meters for temperature according to the manufacturer's instructions (using a NIST thermometer). Also, pH buffers used to calibrate need to be within the "expected range" of the wastewater analyzed by the facility. Currently, the facility uses a 7 and 10 pH buffer standard. The manufacturer's instructions did not indicate the preferred buffer type so SM-4500 H+ states that buffers of at least 2 s.u. difference are to be used to calibrate and third buffer that is 2 s.u. away from the second buffer but less than 10 s.u. is used to "check" the calibration (see Figure 1). I have attached a DO and pH calibration spreadsheet for reference or use by the facility. I have also supplied a DO table to use as verification that the DO meter is reading the correct mg/L for the correct temperature.

I have included two attachments with the report. I discussed with the laboratory that I would provide an example calibration sheet that I use when conducting field measurements. The information on the attached calibration sheet is slightly more detailed than what the facility keeps in their record book. The current method of keeping them in a notebook is compliant and does not need to change if the lab manager does not feel the need. The other document provided is a chart of true DO measurements for a specific temperature at an elevation of 100 feet. The current method of calibrating the DO meter using slope is compliant and does not need to change. The information provided is specifically for educational or optional use. I encourage the lab manager to contact me with any questions about the information.

Milles	
INSPECTOR'S SIGNATURE: Michael Young	DATE: 5/20/2016
Kenni Ms Cale	
SUPERVISOR'S SIGNATURE:Kerri McCabe	DATE: 5/31/2016

Inspection Report: Martin Operating Partnership , AFIN: 70-00039, Permit	. #. AR0000391
SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	⊠S ⊡M ⊡U ⊡NA ⊡NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	Øy 🛛 n 🗆 na 🖾 ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	DY DN ØNA DNE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	Øy 🛛 n 🖾 na 🖾 ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🗆m 🗇u 🗇na 🗇ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🖙 🗇 v 🖓 na 🖓 ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🖾ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs 🗆m 🗇u 🖾na 🖾ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🗆m 🗇u 🗇na 🗇ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🗆m 🗇u 🗇na 🗇ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	Øs 🗆m 🗇u 🖾na 🗇ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: March 2016	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: <u>March 2016</u>15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	
a. SAMPLES REFRIGERATED DURING COMPOSITING:	
b. PROPER PRESERVATION TECHNIQUES USED:	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136: pH and D.O.	
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: Weir	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED: Flow estimated at 002 and 003	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	Øy 🛛 n 🖓 na 🖓 ne
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	Øy 🛛 n 🖓 na 🖓 ne
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	Øy 🛛 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) :	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED <u>>10%</u> OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: Ana-Lab WET Testing; Bio-Analytic for metals	
b. LAB ADDRESS: Kilgore, TX ; Doyline, LA	
c. PARAMETERS PERFORMED: Wet Test; metals and TOC	
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	

SECTION	G: EFFLUENT/R	•		• /	70-00039, Permit #:	AR0000391		
				ATIONS				
	ON VISUAL OBS	ERVATIONS					ĨU ⊡NA ⊡NE	
DETAILS								
OUTFALL #		GREASE		VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER	
001	N	N	Colorless	 Sheen on				
002	N	N	N	N	N	Colorless	receiving surface	
003	Y	N	N	N	N	Colorless	Oil Sheen	
	H: SLUDGE DIS			те				
DETAILS				15				
). E MANAGEMENT ADEQU							
	E RECORDS MAINTAINED ND APPLIED SLUDGE, TY							
3. FUR LA	ND APPLIED SLUDGE, I I	PE OF LAND APPLIE	5 TO: (E.G., FOREST	, AGRICULTURAL, PU	BLIC CONTACT SITE):			
SECTION	I: SAMPLING IN							
	RESULTS WITH			re]U ⊠NA ⊡NE	
DETAILS				10				
	S OBTAINED THIS INSPE							
			IETHOD:FREQUE					
	ROPORTIONED SAMPLE							
	E REPRESENTATIVE OF \							
			E OF DISCHARGE.					
-								
			IT:					
3. SAIVIFLI		RDANCE WITTPERM						
SECTION	J: STORM WATE		DDEVENTION					
	WATER MANAG				2			
DETAILS								
	UPDATED AS NEEDED:	DATE OF LAST UP	DATE					
	AP INCLUDING ALL DISCH	_						
	ION PREVENTION TEAM							
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:								
5. LIST OF POTENTIAL POLLUTANT SOURCES:								
	N-STORM WATER DISCH							
	STRUCTURAL BMPS:							
	NON-STRUCTURAL BMF							
	ROPERLY OPERATED AN							
	TIONS CONDUCTED AS							
						1 10		

FLOW CALCULATION SHEET

Date: 05/	/05/2016	Time: 14:	51			
Head in Ind	ches: 5.8	Feet:	0.483			
Type & Siz	e of Primary Flow	w Measurem	nent Device:	90° V Notc	h Weir	
	¥					
Name & M	odel of Seconda	ry Flow Mea	surement D	evice: Tot	alizer	
		•				
Date of las	t Calibration of S	Secondary FI	ow Device:	<u>Yearly</u>		
Recorded I	Flow at Date & T	ime Listed A	bove: 171	I.5 GPM	(Facility Flow	Meter)
Calculated			-			
	Flow at Date &	Time Listed	Above: 17	79 1 GPM		
	Flow at Date & Ted using flow charts in			79.1 GPM	ook-5 th Edition)	
(Flow is calcula	ted using flow charts in	h: ISCO Open Ch	nannel Flow Mea	e Handb	ook-5 th Edition)	
(Flow is calcula	ted using flow charts in Recorded Valu	h: ISCO Open Ch	nannel Flow Mea	surement Handb	ook-5 th Edition)	
(Flow is calcula	ted using flow charts in Recorded Valu Cal	i: ISCO Open Ch Je - Calc Iculated Valu	nannel Flow Mea culated Valu Je	e Handb	ook-5 th Edition)	
(Flow is calcula % Error =	ted using flow charts in Recorded Valu	ue - Calc	nannel Flow Mea	e Handb	ook-5 th Edition)	
(Flow is calcula % Error =	ted using flow charts in Recorded Valu Cal 171.5	ue - Calc Iculated Valu	nannel Flow Mea culated Valu Je	e X 100	ook-5 th Edition)	
(Flow is calcula % Error = % Error =	ted using flow charts in Recorded Valu Cal 171.5 -7.6	ue - Calc Iculated Valu	nannel Flow Mea culated Valu Je	e X 100	ook-5 th Edition)	
(Flow is calcula % Error = % Error =	ted using flow charts in Recorded Valu Cal 171.5	i: ISCO Open Ch Je - Calc Iculated Valu - 179.1	nannel Flow Mea culated Valu Je	e X 100	ook-5 th Edition)	
(Flow is calcula % Error = % Error = % Error =	ted using flow charts in Recorded Valu Cal 171.5 -7.6	i: ISCO Open Ch Je - Calc Iculated Valu - 179.1	nannel Flow Mea culated Valu Je	e X 100	ook-5 th Edition)	
(Flow is calcula % Error = % Error = % Error =	ted using flow charts in Recorded Valu Cal 171.5 -7.6 179.1	i: ISCO Open Ch Je - Calc Iculated Valu - 179.1 - X 100	nannel Flow Mea culated Valu Je	e X 100	ook-5 th Edition)	
	ted using flow charts in Recorded Valu Cal 171.5 -7.6 179.1 -0.04 4	n: ISCO Open Ch Je - Calc Iculated Valu - 179.1 - X 100	nannel Flow Mea culated Valu Je	e X 100	ook-5 th Edition)	

Reporting Period:	From	2015 Year	05 Month	01 Day	_ To _	2015 Year	05 Month	<u>31</u> Day
Parameter Checked:		NH3-N	-					
		Loading Mass					ntration	
	Mo.	Avg Ibs/c	lay	Mo. A	vg r	ng/l	7-day A	vg mg/l
Reported Value:		<mark>52.88</mark>			<mark>26.7</mark>			3 <mark>2.0</mark>
Calculated Value:	52.88		·	26.7			32.0	
Permit Value:		<mark>8.4*</mark>			<mark>15</mark>			<mark>3.4*</mark>

If calculated value does not equal reported value, explain:

*Ammonia-Nitrogen limit for the Tier 1 production is an interim limit of 8.4 mg/L

Values were equal, but levels exceeded limits across all limitations.

Reporting Period:	From	2015 Year	05 Month	01 Day	_ To _	2015 Year	05 Month	<u>30</u> Day		
Parameter Checked:		TSS	_							
		Loading Mass			Concentration Monthly					
	Mo.	Avg Ibs/o	day	Mo. A	Mo. Avg mg/l		7-day Avg mg			
Reported Value:		66.51		33.5			75			
Calculated Value:	66.51		·	33.5			75			
Permit Value:	112.2		Report			Report				

If calculated value does not equal reported value, explain:

<u>Equal</u>

Water Division Photo	graphic Evidence Sheet	
Location: Martin Operating Partnership	5 1	
Photographer: Michael Young	Date: 05/04/2016	Time: 14:18
Witness: Jim Dodson		Photo #: 1
Description: Oil sheen at Outfall 003.		4:18
Destagrapher: Michael Young		
Photographer: Michael Young	Date: 05/04/2016	Time: 14:20
Witness: Jim Dodson		Time: 14:20 Photo #: 2
Photographer: Michael Young Witness: Jim Dodson Description: Photo showing iron oxide bacteria	and oil sheen in same frame.	

		tographic Evidence S		
Location: Martin Operat	ting Partnership			
Photographer: Michael Y	′oung	Date: 05/04/2	016	Time: 15:15
Witness: Jim Dodson		nlar had na informatio	n en leet eelik	Photo #: 3
Description: Thermomet	ter in composite sam	pler had no informatic	on on last callo	ation date.
Photographer: Michael V	auna and		.04.2016 15:	
Photographer: Michael Y Witness: Jim Dodson	oung	Date: 05/04/2	016	Time: 10:43 Photo #: 4
Description: Sample of I	ab record indicating	15 minute hold time o	n pH analysis v	vas violated.
57 75% 75% 75% 81% 81% 81% 81%	PROJECT NAME 9-14 Calificated Do Calificated Do Calificated Pitt. Supplied to to co Calificated pangle Rettained to the Ran DO ON a Ran Pitt. au gh Sillet and hach to millel reagent part millel reagent part and the reagent of a millel reagent part	1-15 NOTEBOOK NO Moter with alga drift hits with alga of 90 Meter with alga of 90 Meter cong and gub in flowt. b. in flowt. in flowt	ten ten ten ten ten ten ten ten	

pH VALUE (4500-H⁺)/Electrometric Method

b. Saturated potassium hydrogen tartrate solution: Shake vigorously an excess (5 to 10 g) of finely crystalline $KHC_4H_4O_6$ with 100 to 300 mL distilled water at 25°C in a glass-stoppered bottle. Separate clear solution from undissolved material by decantation or filtration. Preserve for 2 months or more by adding one thymol crystal (8 mm diam) per 200 mL solution.

c. Saturated calcium hydroxide solution: Calcine a wellwashed, low-alkali grade CaCO₃ in a platinum dish by igniting for 1 h at 1000°C. Cool, hydrate by slowly adding distilled water with stirring, and heat to boiling. Cool, filter, and collect solid Ca(OH)₂ on a fritted glass filter of medium porosity. Dry at 110°C, cool, and pulverize to uniformly fine granules. Vigorously shake an excess of fine granules with distilled water in a stoppered polyethylene bottle. Let temperature come to 25°C after mixing. Filter supernatant under suction through a sintered glass filter of medium porosity and use filtrate as the buffer solution. Discard buffer solution when atmospheric CO₂ causes turbidity to appear.

d. Auxiliary solutions: 0.1N NaOH, 0.1N HCl, 5N HCl (dilute five volumes 6N HCl with one volume distilled water), and acid potassium fluoride solution (dissolve 2 g KF in 2 mL conc H₂SO₄ and dilute to 100 mL with distilled water).

4. Procedure

a. Instrument calibration: In each case follow manufacturer's instructions for pH meter and for storage and preparation of electrodes for use. Recommended solutions for short-term storage of electrodes vary with type of electrode and manufacturer, but generally have a conductivity greater than 4000 μ mhos/cm. Tap water is a better substitute than distilled water, but pH 4

buffer is best for the single glass electrode and saturated KCl is preferred for a calomel and Ag/AgCl reference electrode. Saturated KCl is the preferred solution for a combination electrode. Keep electrodes wet by returning them to storage solution whenever pH meter is not in use.

Before use, remove electrodes from storage solution, rinse, blot dry with a soft tissue, place in initial buffer solution, and set the isopotential point (¶ 2a above). Select a second buffer within 2 pH units of sample pH and bring sample and buffer to same temperature, which may be the room temperature, a fixed temperature such as 25°C, or the temperature of a fresh sample. Remove electrodes from first buffer, rinse thoroughly with distilled water, blot dry, and immerse in second buffer. Record temperature of measurement and adjust temperature dial on meter so that meter indicates pH value of buffer at test temperature (this is a slope adjustment).

Use the pH value listed in the tables for the buffer used at the test temperature. Remove electrodes from second buffer, rinse thoroughly with distilled water and dry electrodes as indicated above. Immerse in a third buffer below pH 10, approximately 3 pH units different from the second; the reading should be within 0.1 unit for the pH of the third buffer. If the meter response shows a difference greater than 0.1 pH unit from expected value, look for trouble with the electrodes or potentiometer (see §s 5a and b below).

The purpose of standardization is to adjust the response of the glass electrode to the instrument. When only occasional pH measurements are made standardize instrument before each measurement. When frequent measurements are made and the instrument is stable, standardize less frequently. If sample pH

TABLE 4500-H+:II. STANDARD PH VALUES³

Primary Standards

Secondary Standards

4-93

From:	Jim Dodson
То:	Water-Inspection-Report
Cc:	Randall Whitmore; Jay Green; Matt Yost; Chris Crawford
Subject:	MOP Smackover Water Inspection May 5-6 Response & Documentation
Date:	Wednesday, June 15, 2016 10:42:33 AM
Attachments:	SWPPP NOCs posted at Guard Shack.JPG
	SMREF Final SWPPP Wse 16 06.pdf
	AR0000591 insp 20160504.docx
	ARR154674 inspW 20150505.pdf

Please find attached subject documents. If you have any questions or concerns please don't hesitate to contact me. Thanks!

Jim Dodson Sr. Environmental Specialist Martin Resource Management 484 East Sixth Street Smackover, AR 71762 (870)864-7550 (ofc) (713)294-7147 (cell) Fax: 903-988-3803 Email: jim.dodson@martinmlp.com



June 15,, 2016

Arkansas Department of Environmental Quality Water Division 5301 Northshore Drive North Little Rock, AR 72118

Re: Martin Resource Management, Inc. AFIN 70-00039, Permit No.: AR0000591, ARR001516, ARR154674

To Whom It May Concern,

In response to your "Summary of Findings" (attached) resulting from DEQs May 4 and 5 Compliance Evaluation Inspection, find the attached response with documentation.

If you have any questions or require additional information you may contact Jim Dodson at (713) 294-7147 or jim.dodson@martinmlp.com.

Sincerely,

Jay Green Manager – EHS

Attachments

cc: Randall Whitmore, Director - Corporate Environmental Jim Dodson - Sr. Environmental Coordinator Chris Crawford - Environmental Coordinator Martin Files



June 1, 2016

Matt Yost, Senior V.P. Terminalling and Engineering Martin Operating Partnership LP 484 East 6th Street Smackover, AR 71762

RE: Martin Operating Partnership Inspections (Union Co) AFIN: 70-00039 Permit No.: AR0000591 ARR001516 ARR154674

Dear Mr. Yost:

On May 4 and 5, 2016, I performed a Compliance Evaluation Inspection, Industrial Stormwater Inspection, and Construction 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. Copies of the inspection reports are enclosed for your records.

Please refer to the "Summary of Findings" section of each of the attached inspection reports 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 <u>Water-Inspection-Report@adeq.state.ar.us</u>. 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 <u>June 15, 2016</u>.

If I can be of any assistance, please contact me at <u>voungm@adeq.state.ar.us</u> or (501) 837-2073.

Sincerely,

Michael Young District 8 Field Inspector Water Division

	T			-			
			ERMIT #: AR0000	-			5/4/2016
		DUNTY: 70 Union		PDS #: 09102			
ARKANSAS							MEDIA: WN
Department of Environmental Quality			7 LONG: -92.7177				
FACILITY INFORMAT	FACILITY TYPE:	SPECT INSPECT		MATIO	N		
Martin Operating Partnership LOCATION: 484 East 6th Street CITY:			2 - Industrial	1015	31 S - State		
			FACILITY EVALUATION RATING: 4 - Satisfactory				Evaluation
Smackover, AR 71762				RY TIME:	EXIT TIME: 16:30		FECTIVE DATE:
RESPONSIBLE OFFICIAL):00	16:45		PIRATION DATE:
Matt Yost / Senior V.P. Terminalling	g an	d Engineering				1/31/2	2018
COMPANY:	-		FAYETTEVILLE	SHAL	E RELATED:	Ν	
Martin Operating Partnership LP			FAYETTEVILLE	SHAL	E VIOLATION	NS: N	
484 East 6th Street					ION PARTIC		S
CITY, STATE, ZIP: Smackover AR 71762			NAME/TITLE/PHONE/FAX/EMAIL		vironmenta		linator/870-
PHONE & EXT: / FAX:			864-7550/jim.do				
870-881-8700 /			-				
EMAIL:							
CONTACTED DURING INSPECTION:	No						
(S=:	Satisfa		LUATIONS isfactory, N=Not Applicable/E	valuated)			
S PERMIT	S	FLOW MEASUF		N	STORMWA	TER	
S RECORDS/REPORTS	S	LABORATORY		S	FACILITY SITE REVIEW		
M OPERATION & MAINTENANCE	U		CEIVING WATER	S			G PROGRAM
M SAMPLING ** OTHER:	S	SLUDGE HAND	LING/DISPOSAL	Ν	PRETREAT	MENT	
		SUMMARY	OF FINDINGS				
1.) There was a discharge of visible	she			ction.	This is a vie	olation	of permit
condition Part IA. See pic – boom a							•
2.) Samples analyzed for pH and Di	ssol	ved Oxygen hav	e violated hold tir	nes of	f 15 minutes	. This i	s a violation
of permit condition Part III. (C.) (3.).							
in order to meet the hold time. See	atta	ched pic.				_	
3.) The thermometer in the compos	ite s	ampler had no ir	ndication of last c	alibrat	tion date. Tl	his is a	violation of
permit condition Part III. (C.) (3.). Se	e at	tached pic.					

On May 4, 2016 I performed a Compliance Evaluation Inspection at Martin Operating Partnership LP in Smackover, AR. I returned on May 5, 2016 and performed an inspection on the laboratory. During the inspection I observed sheen at Outfall 003 (see Photos 1-2). I also observed that the composite sampler thermometer had no indication of the last calibration date (see Photo 3). All treatment units were in operation at the time of inspection, and I did not observe any violations other than those noted.

The facility has a very high Ammonia-Nitrogen concentration monthly average limit, which have caused numerous effluent violations. A CAO has been issued for violations related to unpermitted discharges caused by high rain events and the CAO may be modified to take into account the ammonia violations. The facility has researched Moving Bed Biofilm Reactors (MBBRs) as a new treatment option and is proposing an install of three (3) units.

The laboratory only had an issue with collecting a sample and analyzing it for pH and Dissolved Oxygen (DO) within the 15-minute holding time (see Photo 4). Calibration is being performed on all devices, but it is recommended to calibrate the DO and pH meters for temperature according to the manufacturer's instructions (using a NIST thermometer). Also, pH buffers used to calibrate need to be within the "expected range" of the wastewater analyzed by the facility. Currently, the facility uses a 7 and 10 pH buffer standard. The manufacturer's instructions did not indicate the preferred buffer type so SM-4500 H+ states that buffers of at least 2 s.u. difference are to be used to calibrate and third buffer that is 2 s.u. away from the second buffer but less than 10 s.u. is used to "check" the calibration (see Figure 1). I have attached a DO and pH calibration spreadsheet for reference or use by the facility. I have also supplied a DO table to use as verification that the DO meter is reading the correct mg/L for the correct temperature. The lab is aware DO and pH samples must be run within required hold time.

I have included two attachments with the report. I discussed with the laboratory that I would provide an example calibration sheet that I use when conducting field measurements. The information on the attached calibration sheet is slightly more detailed than what the facility keeps in their record book. The current method of keeping them in a notebook is compliant and does not need to change if the lab manager does not feel the need. The other document provided is a chart of true DO measurements for a specific temperature at an elevation of 100 feet. The current method of calibrating the DO meter using slope is compliant and does not need to change. The information provided is specifically for educational or optional use. I encourage the lab manager to contact me with any questions about the information.

M. Mar	
INSPECTOR'S SIGNATURE: Michael Young	DATE: 5/20/2016
SUPERVISOR'S SIGNATURE	DATE: 5/21/2016
SUPERVISOR'S SIGNATURE:Kerri McCabe	DATE: 5/31/2016

SECTION A: PERMIT VERIFICATION	4 AD000601
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	ØS □M □U □NA □NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠s □m □u □na □ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
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:	
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:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: March 2016	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□y Øn □na □ne

Depending Dependent Martin Operating Deducation AEINI, 70 00020 Demail 4.	A D0000504
SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	OS ØM OU ONA ONE
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	
b. PROPER PRESERVATION TECHNIQUES USED:	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136: <u>pH and D</u> .O.	
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□y □n Øna □ne
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: Weir	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED: Flow estimated at 002 and 003	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	⊠S ⊡M ⊡U ⊡NA ⊡NE
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES):	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	
QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: Ana-Lab WET Testing; Bio-Analytic for metals	
b. LAB ADDRESS: <u>Kilgore, TX ; Doyline, LA</u>	
c. PARAMETERS PERFORMED: <u>Wet Test; metals and TOC</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	
b. PROPER DILUTION SERIES FOLLOWED:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	

SECT	ION G:	EFFLUENT/RE					A D0000504				
BASE	ED ON	VISUAL OBSE	RVATIONS C	DNLY							
DETA											
OUTFA	-	OIL SHEEN	FLOATING SOLIDS	COLOR	OTHER						
001	1	N	N	N	N	N	Colorless				
002	2	N	N	N	N	N	Colorless Sheen				
003	3	Y	N	N	N	N	Colorless	receiving surface Oil Sheen			
		I				11					
SECT	ION H:	SLUDGE DISP	OSAL								
SLUD	GE DI	ISPOSAL MEE	TS PERMIT F	REQUIREMEN	TS		⊠S ⊡M [
DETA	AILS:										
1. SLL	UDGE MA	NAGEMENT ADEQUA	TE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m				
2. SLI	UDGE RE	CORDS MAINTAINED	AS REQUIRED BY 40	0 CFR 503:			⊠s ⊡m				
3. FO	R LAND A	APPLIED SLUDGE, TYP	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUB	LIC CONTACT SITE):					
		SAMPLING INS									
-		ESULTS WITH	IN PERMIT R	EQUIREMENT	S			⊐U ⊠NA ⊡N			
DETA	AILS:										
1. SAI	MPLES O	BTAINED THIS INSPE	CTION:				Πı				
2. TYF	PE OF SA	MPLE: GRAB: [COMPOSITE: N	METHOD: FREQUE	NCY:						
3. SAMPLES PRESERVED:											
4. FLOW PROPORTIONED SAMPLES OBTAINED:											
	-	TAINED FROM FACILI									
		PRESENTATIVE OF VO		E OF DISCHARGE:							
		LIT WITH PERMITTEE:									
		USTODY PROCEDUR		IT.							
9. SAI	IMPLES C	OLLECTED IN ACCOR	DANCE WITH PERM					′ □n ∅na □n			
SECTI		STORM WATE									
				-							
DETA					QUINEMENTO						
		DATED AS NEEDED:	DATE OF LAST UP	DATE:			ΠY				
2. SIT	E MAP IN	ICLUDING ALL DISCHA	ARGES AND SURFA	CE WATERS:							
		PREVENTION TEAM I									
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:											
5. LIST OF POTENTIAL POLLUTANT SOURCES:						Πı					
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:											
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:											
8. LIS	ST OF STR	RUCTURAL BMPS:									
9. LIS		N-STRUCTURAL BMPS	S:				ΠJ	′ □n ⊠na □n			
10. BMPS PROPERLY OPERATED AND MAINTAINED:											
IU. DIVI		ERLI OPERATED ANI	D MAINTAINED:				ΠA	′ □n ⊠na □n			

Inspection Report: Martin Operating Partnership, AFIN: 70-00039, Permit #: AR0000591 FLOW CALCULATION SHEET								
Date: 05/	Date: 05/05/2016 Time: 14:51							
Head in Inc	hes: 5.8	Feet:	0.483					
Tupo & Size	of Drimony El	ow Maggurom	ont Dovio	00° V	/ Noto	h Wair	,	
	e of Primary Fl			3. 90 (ii weii		
	dal of Sacand	any Flow Maa	ouromont	Dovice		tolizor		
	del of Second	ary Flow Meas	surement	Device	. 10	talizer		
Date of last	Calibration of	Secondary Fl	ow Device	: Ye	arly			
Recorded F	low at Date &	Time Listed A	bove: 1	71.5 G	PM		(Facility Flow Meter)	
							(i domity i lott motor)	
	Flow at Date 8			179.1 (-	th		
(Flow is calculat	ed using flow charts	in: ISCO Open Ch	annel Flow Me	easureme	nt Handb	book-5" Ec	dition)	
% Error =	Recorded Va	lue - Calc	ulated Val	ue	K 100			
	C	Calculated Value			× 100			
0/ 5	171.5	-	179.1		(400			
% Error =		179.1		/	〈 100			
	-7.6							
% Error =	179.1	— X 100						
	0.04							
% Error =	-0.04	X 100						
% Error =	4	%						
Comments:								
	_		_					

Reporting Period:	From <u>2015</u>	05	<u>01</u> To	<u>2015</u>	05	31	
	Year	Month	Day	Year	Month	Day	
Parameter Checked:	<u>NH3-N</u>						
	Loading Mass		Concentration Monthly				
	Mass Mo. Avg Ibs	s/day	Mo. Avg. ·		7-day Avg mg/l		
Reported Value:	<mark>52.88</mark>		<mark>26.7</mark>		<mark>32.0</mark>		
Calculated Value:	52.88		26.7		32.0		
Permit Value:	<mark>8.4*</mark>		<mark>15</mark>		<mark>8.4</mark> *		

If calculated value does not equal reported value, explain:

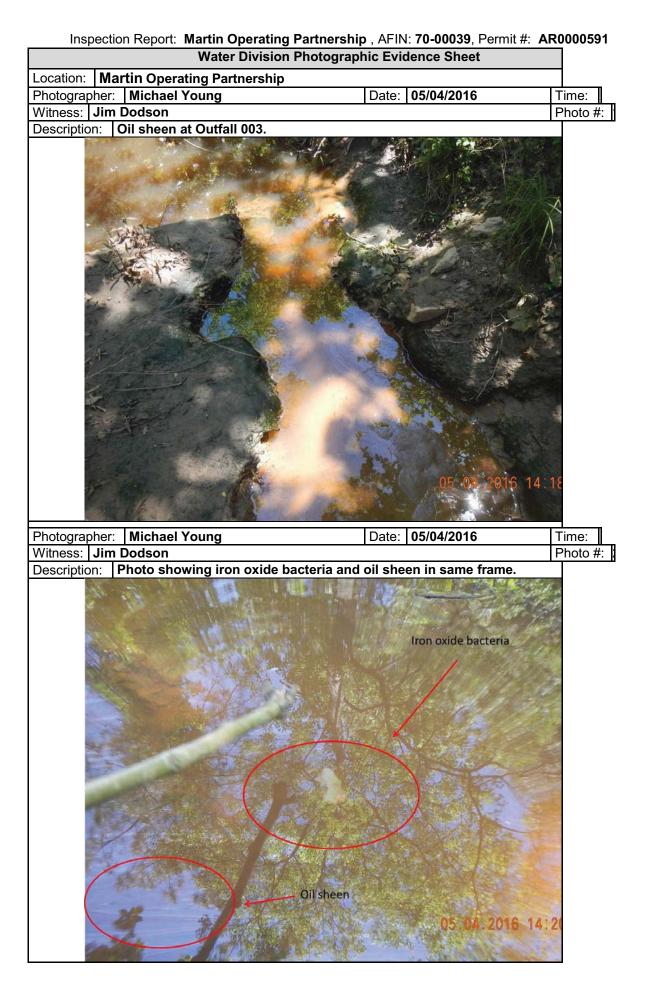
*Ammonia-Nitrogen limit for the Tier 1 production is an interim limit of 8.4 mg/L

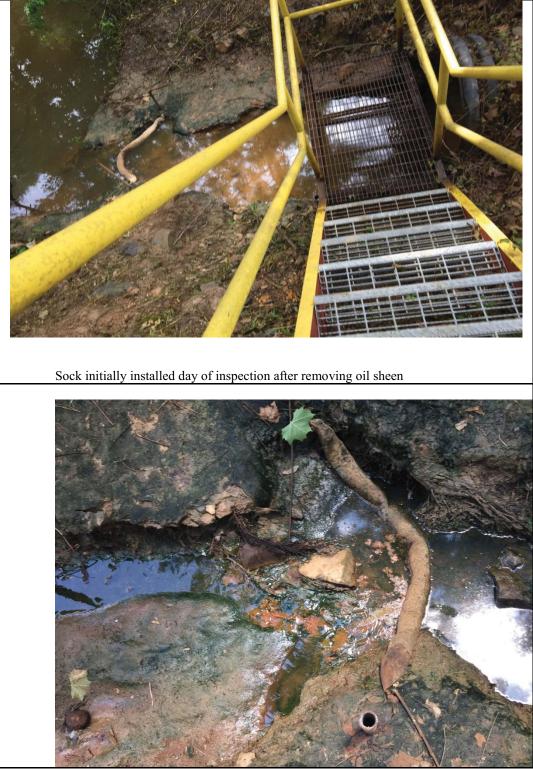
Values were equal, but levels exceeded limits across all limitations.

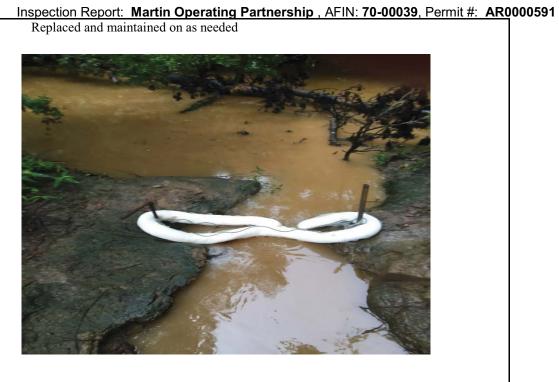
Reporting Period:	From <u>2015</u> Year	<u>05</u> Month	<u>01</u> To Day	<u>2015</u> Year	<u>05</u> Month	<u>30</u> Day
Parameter Checked:	TSS					
	Loading Mass				entration onthly	
	Mo. Avg II	os/day	Mo. Avg.	- mg/l	7-day Avg mg/l	
Reported Value:	66.51		33.5		75	
Calculated Value:	66.51		33.5		75	
Permit Value:	112.2		Repo	<u>rt</u>	Repo	rt

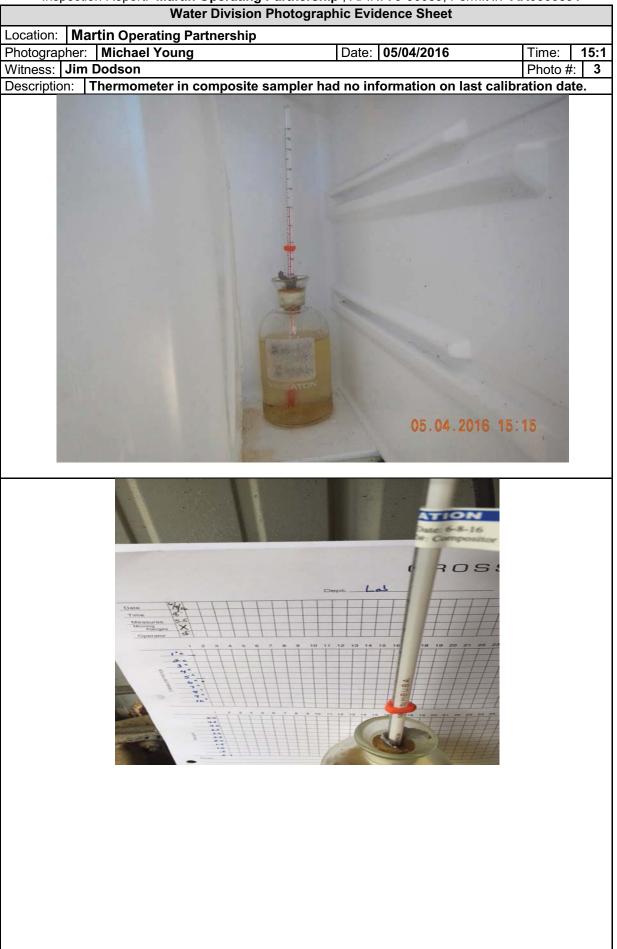
If calculated value does not equal reported value, explain:

<u>Equal</u>









Photographer: Michael Young Date: 05/04/2016 Time: 10:4 Witness: Jim Dodson Photo #: 4 Description: | Sample of lab record indicating 15 minute hold time on pH analysis was violated. 9-14-15 Calibrated Do meter witch plas for? 2% 11/2 Calibratait R.H. meter with styre of 96.13 gets lits to callect comp and greb Callatert, angle in floint 15% Returned to 804/2 Rom 81%a DO on soult of 7.8 8Ma Ray P.H. a grab routes 7.0 Allal are high some cult with & I water and any with come and two of mills which present and two of ach cults is and the set the for Sing is in their meter a rout of 1.40 miles 80/10 melfid. A Homoschund 100 We 2 I Water and 100 m Delenter In write bie Both the rise Polace Will regard two as y lidingle Comparts in Colors will related comp Studingle Comparts in Colors in Coo search of 100 million will Erler. P18/A Wated me The filter with D.J. utitin, But Introgen ampringe distillation with carry page adjuster 2.4 05 05.2 distillation. 016 10:43 that the way glab single, another 5-23-16 _NOTEBOOK NO. PROJECT NAME .-23 Calibrated D. O. Meter with Stope of 100.8 73% Calibrated Pot meter with Stype of 95.46 PA Jab to collect Comp. and grab scaple 74% Jeft Collected samples in plaint. 71% 75% Returned to lab. 8.2 ard 8%A DO N Rom Ray P.H. on 7.9 \$ 1/4 crab Silled one back sample Cell with D. F. water and one with comple payle, oddal are he graulpick vegant one and two to each cell, mighed and art times for 5 min. Rom in back meter to result of .048 mall 80% Cell Arrive engel 100 mc of Dit. Water and 100 of comp. Delighte in delevelere, gipted two me of delinded D.T. water with the Coo Vial David belance then pipter two me of blended Cong. with one Coo Vial laber Cong. should be D.J. Water and luon 80%A short sugles well, put in COD reather @ 150" , pet strain for 2 Hes.

Inspection Report: Martin Operating Partnership , AFIN: 70-00039, Permit #: AR0000591 Figure 1. SM-4500 H+ calibration method for pH meters is outlined in blue.

pHVALUE (4500-H")/Electrometric Method

b. Sal 11ral tdpotassium hydrogen tartrote sofm/01 t: Shake vlgorously an excess (5 10 10 g) of finely Cl)stalltnc K llCJll O_6 with 100 10 300 mldistilled water al 25°C in a glass-stoppered bottle. • eparate clear soluuon from undissolved material by decantation or litrallon. Preserve for 2 months or more by adding one thymol crystal (8 mm diam) per 200 mL soluuon.

c. Saturated ca/c111m flydrox1de soft111011 Calcrnc a well washed, IO\\ alkal1 grade C:iC0₁in a plaunum dish by 1gniung for I h at000°C.Cool. hydrate by slo^{*}ly adding distilled water wllh s11mng. and heat toboiling. Cool, filter, and collect solid Ca(OHh on a fnued glass filter of medium poros1l) Dry at I 10°C. cool. and pulverize to unifonnly fine granules. Vigor-ously shake an excess of fine granules \\theta d1stJlled water an a stoppen'<1 polyelh}lene boule. Let temperature come to 25°C after mixing. Filter supemat:int under suction through a sintered glass filter of medium porosity and use filtrate os the buffer soluuon. OïICllrd buffer soltmon when atmospheric CO:causes turbidity to appear.

d Amiliary solut1011s Ω .IN NaOll, O.I MICI, SA ICI (dilute fi.,,e VOlumes 6N IICI mich one .,,olume d1sl 11led water). and acid potassium Huonde soluuon (dissolve 2 g Kf in 2 ml cone H₂ O₄ and dilute to 100 ml wnh d1sl 11led water).

4. Procedure

a. butr11111ml rolibra11011: In each ca e follow manufacturer's mstrucuons for plI meter and for storage and preparation of electrodes for use. Recommended soluuons for shon term storage of electrodes vary \\th type orelectrode and manufacturer, but generall) have a conducuv11y greater than -1000 µmhos/em. Tap water 1s a better subsunne than disulled water. but plI -l

burrer *is* best for the single glass electrode 311d saturated KCI 1s preferred for a calomcl and *Agf*AgCI reference electrode.Saturated KCI 1s the preferred solution for a comb1n:i11on electrode. Keep electrodes wet by rcnimmg them to storage solution whenever pH meter 1s not in use.

)lefore use, remO\e electrodes from Sloragc solullon, nse blot di') \\\Uh3sofitISS!IC, pbce m mllial bU£rersolUllOO. and SCI the isopotenlial poinr (bove) elect a second buffi?r "1tlun 2 pTT units of sample pTI and brln& sample and buffer to same lem rature. \\hlch ma be the room temperature, :i fixed tern. (!erature such os 2S°C.or the tcm rature or a fresh samele Remo\e electro<les h'om first buffer. rinc;c lllorou8!\I}\\u1disiilled '' er, bid <II), and immerse m second OOITCr. Rœord temperature o measurernen and ad ellljlc?rature dial on meter so ih:it mC1er Indicates \3f!IC of bu!Ter at test tern I' Inure (This 1s a Slope adjusunerifJ

CT. The plvaluel fstoo m the uibles or the bufThr used at **Me** lest temperature emoH electrodes from second bu er. nnsc thorou I \\ith distilled wnter and d'l. clcdrodcs as indicated abo,e. Immerse m a third bu er bclo_pll 10awox1matcly pH units d1£erent from the second the reading should be \\ithm

p,I unn for the pH o the third buffi?r tr the meter rcspollSll! hows a difference greater than 0. I pH unit from exted value look for trouble Y.1h the electro<les or potentiometer (see -5o lind *b* belo\\).

The purpose of standardl.1..3tion 1 sto adJUSI the response of the glas., electrode to the instrument. When only occasional pH measurements arc made st:indardtze instrument before ca h measurement. When frequent meosurcmenL.; arc made and the instrument 1s stable. st:indard1ze *less* frequently. If sample pH

TABLE 4500-H+:II. STANDARD PH VALUES3

Pnm • tundurds

· cco Standards



July 20, 2016

Matt Yost, Senior V.P. Terminalling and Engineering Martin Operating Partnership LP 484 East 6th Street Smackover, AR 71762

RE: Response to Inspections (Union Co) AFIN: 70-00039 NPDEA Permit No. AR0000591 ARR001516

ARR154674

Dear Mr. Yost:

I have reviewed the response pertaining to my May 4 and 5, 2016 inspections of the Martin Operating Partnership, LP 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 (501) 837-2073 or you may e-mail me at <u>youngm@adeq.state.ar.us</u>.

Sincerely,

Ming

Michael Young District 8 Field Inspector Water Division