



WATER DIVISION INSPECTION REPORT

ARKANSAS
Department of Environmental Quality

AFIN: 70-00473	PERMIT #: ARG550398	DATE: 2/6/2017
COUNTY: 70 Union	PDS #: 095666	MEDIA: WN
GPS LAT: 33.159614 LONG: -92.443849 LOCATION: Entrance		

FACILITY INFORMATION

NAME:
Anthony Forest Products Company – Urbana Sawmill

LOCATION:
1236 Urbana Road

CITY:
EI Dorado, AR 71730

RESPONSIBLE OFFICIAL

NAME / TITLE:
Derek Ratchford / Area Manager

COMPANY:
Anthony Forest Products Company, LLC

MAILING ADDRESS:
P.O. Box 724

CITY, STATE, ZIP:
Strong AR 71765

PHONE & EXT. / FAX:
870-962-3206 / 870-962-3320

EMAIL:
Derek.Ratchford@canfor.com

CONTACTED DURING INSPECTION: Yes

INSPECTION INFORMATION

FACILITY TYPE: 2 - Industrial	INSPECTOR ID#: 101531 S - State		
FACILITY EVALUATION RATING: 2 - Marginal	INSPECTION TYPE: Compliance Evaluation		
DATE(S): 2/6/2017	ENTRY TIME: 09:30	EXIT TIME: 14:00	PERMIT EFFECTIVE DATE: 7/1/2014
			PERMIT EXPIRATION DATE: 6/30/2019

FAYETTEVILLE SHALE RELATED: N

FAYETTEVILLE SHALE VIOLATIONS: N

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:

Randy Evans/EHS Manager/870-962-3206/Randy.Evans@canfor.com

Amanda Gallagher/GBMc Environmental Engineer/501-847-7077/agallagher@gbmcassoc.com

Tobin Fulmer/ADEQ D8 Water Inspector

AREA EVALUATIONS

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

S	PERMIT	S	FLOW MEASUREMENT	N	STORMWATER
U	RECORDS/REPORTS	S	LABORATORY	M	FACILITY SITE REVIEW
U	OPERATION & MAINTENANCE	M	EFFLUENT/RECEIVING WATER	M	SELF-MONITORING PROGRAM
S	SAMPLING	U	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

- 1.) The influent tank had excessive solids (see Photo 5). This is a violation of permit condition Part 4.1.1. SEE SOLIDS COMMENTS.
- 2.) The chlorine contact tube did not have any chlorine tablets (see Photos 2-4). This is a violation of permit condition Part 4.1.1. SEE CHLORINE COMMENTS
- 3.) The facility could not provide forms from the ADEQ website used to evaluate the system a minimum of four times per year. This is a violation of permit condition Part 4.1.3. SEE EVALUATION COMMENTS
- 4.) Twenty-four hour reporting for violations of Monthly Average or a Daily Maximum discharge limitation for any of the pollutants listed in Part II are not being reported by the facility. This is a violation of permit condition Part 6.4.3. SEE 24-HOUR REPORTING COMMENTS

GENERAL COMMENTS

On February 6, 2017, I completed an inspection on the treatment unit for permit ARG550398. In attendance for the inspection was Randy Evans, HSE Manager, and Amanda Gallagher, Environmental Engineer with GBMc. The unit consists of a Norweco (Singular) Model 960 with aeration and chlorine contact. The unit was in operation during the inspection and produced a discharge when the effluent holding tank filled to the point the pump was activated by float system. I observed the influent tank, chlorine contact, and effluent holding tank. There is also an additional chlorine contact after the effluent holding tank. The influent tank had excessive sludge as observed through the septic pumping portal (see Photo 5). The aerator motor was running; but due to the cement cap, it was not observed during the inspection. The chlorine contact was observed to not have any chlorine tablets in the contact tube (see Photo 2). The effluent holding tank was observed and the effluent was brown but did not smell septic and the float and pump system was in operation. There was an additional chlorine contact tube after the effluent holding tank that also lacked chlorine tablets in the chlorine contact tube (see Photos 3-4). This system has had frequent violations of TSS, BOD5, Fecal Coliform Bacteria (FCB), and DO upon inspecting the 2014-2016 DMRs. Maintenance contract is held by Crawford Plumbing (Certification SW56) and the contract operator is listed as Mike O'Connor (License #010202). It was suggested to the facility that maintenance to the system needs to be performed more periodically and the staff may want to work under the guidance of the licensed operator to add chlorine tablets more often.

SOLIDS COMMENTS:

During the inspection, I observed the influent tank of the system to have excessive solids. The solids need to be pumped by a licensed septic hauler and disposed of as according to Part 4.6 of the permit. Proof of the removal is required as a response to this violation. Excessive solids could affect the BOD5 and TSS limitations from Part II.

CHLORINE COMMENTS:


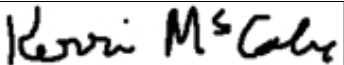
During the inspection, I observed both chlorine contact tubes to not have any chlorine tablets. Proof of the tablets added to the chlorine contact tubes will be required as a response to this violation. The facility may need to keep tablets on hand to add at a more frequent interval. Lack of disinfection could cause FCB limitations from Part II.

EVALUATION COMMENTS:

The facility could not provide the evaluation forms required from Part 4.1.3. The evaluation forms (included) are available on the ADEQ website and need to be filled out a minimum of four times per year and made available during an inspection.

24-HOUR REPORTING:

Part 6.4.3. states that "Violation(s) of a monthly average or a daily maximum discharge limitation for any of the pollutants listed by the Director in Part I (sic) of the permit to be reported in writing within 24 hours to the Enforcement Section of the Water Division of the ADEQ. The lab results should also be submitted with the report." There is a typo in the permit that states Part I and was meant to be Part II. When the facility receives the laboratory results and the samples violate the limits in Part II, the facility is required to contact Enforcement Branch of the Office of Water Quality within 24 hours in writing and include the laboratory results. This has not taken place by the facility.

INSPECTOR'S SIGNATURE:  Michael Young	DATE: 2/7/2017
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 3/3/2017

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ALL DISCHARGES ARE PERMITTED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
a. DATES AND TIME(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
b. EXACT LOCATION(S) OF SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
d. ANALYTICAL METHODS AND TECHNIQUES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
e. RESULTS OF CALIBRATIONS:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
f. RESULTS OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
g. DATES AND TIMES OF ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: <u>Maintenance contracted.</u>	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: <u>Concentration only.</u>	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: <u>Treatment unit had inadequate disinfection and excessive solids.</u>	
1. TREATMENT UNITS PROPERLY OPERATED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
2. TREATMENT UNITS PROPERLY MAINTAINED: <u>No chlorine tablets and influent septic tank full of solids.</u>	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE: <u>No chlorine tablets.</u>	<input type="checkbox"/> S <input type="checkbox"/> M <input checked="" type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: <u>Operator is contracted.</u>	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> 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 type="checkbox"/> Y <input type="checkbox"/> N <input checked="" 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 type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
DETAILS: Flow is estimated by water usage.	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: __ TYPE OF DEVICE: <u>Estimate</u>	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" 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 type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
4. CALIBRATION FREQUENCY ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
9. HEAD MEASURED AT PROPER LOCATION:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> 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 checked="" type="checkbox"/> Y <input type="checkbox"/> N <input 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>American Interplex</u>	
b. LAB ADDRESS: <u>8600 Kanis Road Little Rock, AR 72204</u>	
c. PARAMETERS PERFORMED: <u>All except pH and DO</u>	
8. BIOMONITORING PROCEDURES ADEQUATE:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
a. PROPER ORGANISMS USED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
b. PROPER DILUTION SERIES FOLLOWED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
c. PROPER TEST METHODS AND DURATION:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	<input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

DMR Calculation Check

Reporting Period: From 2016 07 01 To 2016 12 31
Year Month Day Year Month Day

Parameter Checked: BOD5

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>N/A</u>	<u>61</u>	<u>61</u>
Calculated Value:	<u>N/A</u>	<u>61</u>	<u>61</u>
Permit Value:	<u>N/A</u>	<u>10</u>	<u>15</u>

If calculated value does not equal reported value, explain:

Equal

BOD5 was in violation of effluent limitations for Monthly Average and 7-Day Average.

DMR Calculation Check

Reporting Period: From 2016 01 01 To 2016 06 30
Year Month Day Year Month Day

Parameter Checked: TSS

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>N/A</u>	<u>96</u>	<u>96</u>
Calculated Value:	<u>N/A</u>	<u>96</u>	<u>96</u>
Permit Value:	<u>N/A</u>	<u>15</u>	<u>22.5</u>

If calculated value does not equal reported value, explain:

Equal.

TSS was in violation of effluent limitations for Monthly Average and 7-Day Average.

Water Division Photographic Evidence Sheet

Location:	Anthony Forest Products Compan				
Photographer:	Michael Young	Date:	02/06/2017	Time:	13:12
Witness:	Randy Evans; Amanda Gallagher; Tobin Fulmer			Photo #:	1
Description:	Treatment unit consists of (from right to left) influent tank, aeration, and chlorine contact.				



Photographer:	Michael Young	Date:	02/06/2017	Time:	13:16
Witness:	Randy Evans; Amanda Gallagher; Tobin Fulmer			Photo #:	2
Description:	Chlorine contact did not have any chlorine tablets.				



Water Division Photographic Evidence Sheet

Location:	Anthony Forest Products Compan			
Photographer:	Michael Young	Date:	02/06/2016	
Witness:	Randy Evans; Amanda Gallagher; Tobin Fulmer	Time:	13:26	
Description:	Additional chlorine contact chamber.		Photo #:	3



Photographer:	Michael Young	Date:	02/06/2017	
Witness:	Randy Evans; Amanda Gallagher; Tobin Fulmer	Time:	13:26	
Description:	Additional chlorine contact tube did not have any chlorine tablets.		Photo #:	4



Water Division Photographic Evidence Sheet

Location:	Anthony Forest Products Compan		
Photographer:	Michael Young	Date:	02/06/2017
Witness:	Randy Evans; Amanda Gallagher; Tobin Fulmer	Time:	13:19
Description:	Influent tank had excessive solids circled in red.		



Figure 1. Overview of the location of the ARG550398 treatment unit. Unit serves main office and maintenance building.



From: [Young, Michael](#)
To: [McConnell, Melissa](#)
Subject: FW: Anthony Forest Products Company Inspections (Union Co)
Date: Thursday, March 16, 2017 10:36:55 AM
Attachments: [image001.png](#)

Melissa,

Would you please attach this e-mail to WID's 21749, 21750 and 21752?

Thank you,

Michael Young
District 8 Inspector
El Dorado Field Office
ADEQ Water Division
Cell Phone: 501-837-2073
youngm@adeq.state.ar.us

From: Young, Michael
Sent: Thursday, March 16, 2017 10:34 AM
To: 'Amanda Gallagher'
Cc: 'Randy.Evans@canfor.com'
Subject: RE: Anthony Forest Products Company Inspections (Union Co)

Amanda,

A two-week extension from the due date of March 20, 2017 is granted. The response will be due April 3, 2017.

As a reminder, if the corrective measure for the response to the "summary of Findings" will take longer than the required due-date, please provide a timeframe of completion.

Thank you,

Michael Young
District 8 Inspector
El Dorado Field Office
ADEQ Water Division
Cell Phone: 501-837-2073
youngm@adeq.state.ar.us

From: Amanda Gallagher [<mailto:agallagher@gbmcassoc.com>]
Sent: Thursday, March 16, 2017 10:29 AM
To: Young, Michael
Cc: 'Randy.Evans@canfor.com'
Subject: FW: Anthony Forest Products Company Inspections (Union Co)

Michael,

On behalf of Anthony Forest, I would like to request at least a two week extension on the required response to the inspection. Due to the intricacy of the findings and the potential required long term actions, additional time is necessary to adequately address the inspection findings. Thank you for your time.

Amanda Gallagher, P.E.
GBMc & Associates
219 Brown Lane
Bryant, AR 72022
Phone: (501) 847-7077

From: McCabe, Kerri [<mailto:MCCABE@adeq.state.ar.us>]
Sent: Monday, March 06, 2017 10:46 AM
To: Derek.Ratchford@canfor.com; Randy.Evans@canfor.com; Amanda Gallagher <agallagher@gbmcassoc.com>
Cc: Young, Michael <youngm@adeq.state.ar.us>
Subject: Anthony Forest Products Company Inspections (Union Co)

Please find attached the inspection reports submitted by Inspector Young. Thank you.

Kerri McCabe

Inspector Supervisor
ADEQ – Water Division
Field Services – Inspection Branch

Office – (501) 682-0642
Work Cell – (501) 352-5641
Fax – (501) 682-0880
5301 Northshore Drive
North Little Rock, AR 72118-5317



From: [Amanda Gallagher](#)
To: [Water-Inspection-Report](#)
Cc: [Young, Michael](#); [Evans, Randy](#)
Subject: Anthony-Urbana March 2017 ADEQ Inspection Response
Date: Monday, April 03, 2017 3:31:35 PM
Attachments: [Anthony Urbana ADEQ Inspection March 2017 Response \(2\).pdf](#)

To Whom It May Concern:

On behalf of Anthony Forest Products Company, LLC – Urbana Sawmill, please find attached the required response to ADEQ’s Compliance Evaluation Inspection performed on February 06, 2017.

Amanda Gallagher, P.E.
GBMc & Associates
219 Brown Lane
Bryant, AR 72022
Phone: (501) 847-7077

April 03, 2017

Mr. Michael Young
District 8 Field Inspector
Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

RE: Anthony Forest Products Company, LLC Compliance Inspection Response
AFIN: 70-00473
NPDES Permit No. AR0047384, Permit Tracking No. ARR000977, Permit
Tracking No. ARG550398, and Permit Tracking No. ARG550540

Dear Mr. Young:

On February 06, 2017, ADEQ conducted a routine compliance evaluation inspection at Anthony Forest Products Company, LLC – Urbana Sawmill (Anthony – Urbana). A copy of this compliance inspection report and letter was received by Anthony-Urbana on March 06, 2017. The inspection report listed one finding associated with NPDES Permit No. AR0047384, seven findings associated with General Permit Tracking No. ARR000977, four findings associated with General Permit Tracking No. ARG550398, and no findings associated with General Permit Tracking No. ARG550540. The letter also requested that a written response to the findings including corrective actions be submitted by April 03, 2017. Anthony-Urbana's responses are as follows:

NPDES Permit No. AR0047384:

ADEQ Finding No. 1:

The flow device at Outfall 001 is not maintained to provide adequate volume of monitored discharges. Materials were observed in the weir box and roots growing up and through the V-notch weir.

Anthony-Urbana Response:

Vines, roots, and debris have been removed from the weir and weir box. Pictures showing the above described corrective actions can be found in Attachment 1.

General Permit Tracking No. ARR000977:

ADEQ Finding No. 1:

The facility has kiln ash pile with no control measures that is contributing to pollution of UT of Woodard Creek.

Anthony-Urbana Response:

Anthony-Urbana understands the need for appropriate control measures for the kiln ash pile in order to minimize exposure and manage storm water runoff in a manner that minimizes the discharge of potential pollutants off site.

The amount of kiln ash stored onsite varies throughout the year. Anthony-Urbana is constantly investigating new uses for the kiln ash in order to minimize the amount of kiln ash stored onsite.

Silt fence has been added to the downstream side of the kiln ash pile as a temporary control measure. Pictures showing the above described corrective action can be found in Attachment 2.

Anthony-Urbana is evaluating options for additional control measures and a long term storage solution in order to control runoff from the kiln ash pile. Options being considered include:

- Installation of a concrete or earthen berm with an outlet structure around the current biochar pile.
- Moving the storage location of the kiln ash pile away from a drainage path and install appropriate controls (berm with outlet). I.e. north end of the wet deck.

However, due to unknown future facility modifications, a final decision has not been feasible.

ADEQ Finding No. 2:

The facility has contributed kiln ash bottom deposits to UT of Woodard Creek through insufficient control measures

Anthony-Urbana Response:

See Anthony-Urbana Response to ADEQ Finding No. 1.

ADEQ Finding No. 3:

The facility is not making an effort to minimize exposure of the kiln ash pile, which is contributing to pollution of UT of Woodward Creek from Outfall 011.

Anthony-Urbana Response:

See Anthony-Urbana Response to ADEQ Finding No. 1.

First ADEQ Finding No. 4:

Oil sheen was observed in the ditch draining to Outfall 003 from the kiln area. The facility needs to adequately use good housekeeping measures and maintain all equipment to prevent the discharge of pollutants in stormwater discharged to receiving waters.

Anthony-Urbana Response:

Equipment associated with the kilns were found to be a potential source for the oil sheen. Kiln equipment (motor, chain, lumber carts, etc) requires significant amount of lubrication due to repetitive use and the hot kiln environment. In future, employees will be trained to only use the amount of grease necessary on equipment associated with the kiln. Any spills will be immediately cleaned up and reported to the EHS manager.

The forklifts used to place lumber in the kiln were also found to be a potential source for the oil sheen. Forklifts are currently maintained once/month. However, they are still apt to have leaks due to heavy usage. Anthony-Urbana is in the process of replacing older forklifts, which are more apt to have more frequent leaks. In future, leaks from a fork lift will be immediately cleaned up and the forklift will be maintained in a timely manner in order to fix the leak.

Oil booms have been placed in the drainage ditch leading to Outfall 003, as can be seen in the picture found in Attachment 3. The kiln area and drainage ditch leading to Outfall 003 will be monitored weekly by the EHS manager to ensure good housekeeping practices are being maintained and the oil booms are properly maintained.

Please note that the exact location of the oil and grease noted on the ground that was noted in Photo No. 12 of the ADEQ inspection could not be determined. Attachment 3 contains pictures of the area taken during the quarterly inspection of the general area of the kilns.

Second ADEQ Finding No. 4:

Erosion and sediment controls are not being utilized in the ditch that drains Outfall 008.

Anthony-Urbana Response:

This ditch is normally vegetated. However, the ditch was cleaned out as part of a major facility cleanup. Natural vegetation is currently being re-established. Rip-rap will be placed in areas where vegetation cannot be established. Pictures showing the above described corrective action can be found in Attachment 4.

During 2017, Anthony-Urbana also plans to re-route stormwater from the Outfall 008 drainage basin to the old wet deck pond associated with Outfall 009. The pond will allow any bark or other solids to settle out and not be discharged offsite.

ADEQ Finding No. 5:

The facility is not managing runoff at Outfall 011 in a manner to minimize the pollutants discharged to UT of Woodward Creek.

Anthony-Urbana Response:

See Anthony-Urbana Response to ADEQ Finding No. 1.

ADEQ Finding No. 6:

Sampling of Outfall 011 is not taking place and it has the greatest exposure to significant sources of pollution (kiln ash).

Anthony-Urbana Response:

The facility samples in accordance with the current ADEQ Notice of Coverage (NOC). The NOC states that Outfalls 003, 007, and 008 will be sampled while Outfalls 002, 004, 005, 006, and 009-012 are considered similar. The outfalls which are sampled and the ones that are considered similar was last “approved” by ADEQ. The SWPPP includes the required documentation on how the similar outfall determinations were made. Thus, Anthony Forest is meeting the requirements of Part 3.8 of the general permit and feels that this does not constitute a permit violation.

However pursuant to the ADEQ inspection, Anthony did review the similar outfall evaluation and determined that due to recent facility changes that Outfall 011 is no longer similar to Outfall 003 based on a consideration of industrial activity, significant materials and management practices, and activities within the area drained by the outfall. Outfall 011 will be sampled along with Outfalls 003, 007, and 008. Notification of this change has been made to ADEQ – Office of Water Quality Permits Section in order to update ADEQ records and the Notice of Coverage.

General Permit Tracking No. ARG550398:

ADEQ Finding No. 1:

The influent tank had excessive solids.

Anthony-Urbana Response:

Per the operation and maintenance manual, the pretreatment chamber of the Norweco System is expected to have some floatable solids. The system was inspected/maintenanced on February 17th and March 20th and was determined to be in proper working order. The floatable solids and sludge levels in the system will be monitored in the future and pumped out when necessary.

ADEQ Finding No. 2:

The chlorine contact tube did not have any chlorine tablets.

Anthony-Urbana Response:

Chlorine tablets have been added to the system. This was verified during a site visit on March 15, 2017. A picture showing the above described actions can be found in Attachment 5.

ADEQ Finding No. 3:

The facility could not provide forms from the ADEQ website used to evaluate the system a minimum of four times per year.

Anthony-Urbana Response:

The ADEQ maintenance form will be utilized in the future. The system was last maintained on March 20, 2017. The completed ADEQ maintenance form can be found in Attachment 6.

ADEQ Finding No. 4:

Twenty-four hour reporting for violations of Monthly Average or a Daily Maximum discharge limitation for any of the pollutants listed in Part II are not being reported by the facility.

Anthony-Urbana Response:

Any future permit limit excursion will be reported within 24 hours of the known excursion in accordance with Part 6.4 of the general permit.

We appreciate ADEQ's concerns in this matter. We trust our responses satisfy the inspection findings. Please do not hesitate to me at (870) 962-3206 or Amanda Gallagher with GBMc at (501) 847-7077 should you have any questions or need additional information regarding this issue.

Respectfully submitted,
Anthony Forest Products Company, LLC

A handwritten signature in blue ink, appearing to be 'Anthony Urbana', is written over the typed name and company name.

*Mr. M. Young - ADEQ
April 03, 2017
Page 7*

Randy Evans
EH&S Manager

Attachment

cc: Amanda Gallagher – GBM^c & Associates

Attachment 1

Outfall 001 Photo

Photograph of Outfall 001 weir.



Attachment 2

Outfall 011 Photos

Photograph 1 of silt fence installed down gradient of the kiln ash pile.



Photograph 2 of silt fence installed down gradient of the kiln ash pile.



Photograph 3 of silt fence installed down gradient of the kiln ash pile.



Photograph 4 of silt fence installed down gradient of the kiln ash pile.



Attachment 3

Outfall 003 Photos

Photograph showing oils booms that were placed in the drainage ditch leading to Outfall 003.



Photograph showing area in the vicinity of the kilns where excess grease has been observed.



Attachment 4

Outfall 008 BMP Photos

Photograph showing the upper part of the ditch leading to Outfall 008. Vegetation has been established in the lower part of the ditch and starting to grow in the upper portion.



Attachment 5

ARG55 Photos

The following photograph shows chlorine tablets that were added to the ARG55 treatment system.



Attachment 6

ARG55 Maintenance Form for 1st Quarter 2017

Arkansas Department of Environmental Quality

5301 Northshore Drive, North Little Rock, AR 72118

Permit Tracking No.: ARG550398 85
Date of Evaluation 3/20/2017

ARG550000 Individual Treatment System Evaluation

Part 1 General Information

Permittee: <i>Campbell</i>	County: <i>Union</i>	Phone Number: <i>870 962-3300</i>
Site Location (911 Address): <i>1335 Wilson Rd</i>	City: <i>Union Ark</i>	State Zip

Part 2 Assessment

Items:	Description: In the space below, list any deficiency assessed and/or action(s) taken.
1 Electrical <input checked="" type="checkbox"/>	
2 Pump(s) <input checked="" type="checkbox"/>	
3 Discharge Route <input checked="" type="checkbox"/>	
4 Chlorinator <input checked="" type="checkbox"/>	
5 Contact Chamber <input checked="" type="checkbox"/>	
6 Clean Outs <input checked="" type="checkbox"/>	
7 Sludge Depth <input checked="" type="checkbox"/>	<i>12" of Sludge</i>
8 Other Components <input type="checkbox"/>	

Part 3 Sludge Removal

1 Solids Removal Service	2 License Number	3 Date of Service
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Part 4 Certification

I certify that I have conducted all applicable assessments listed above and have taken the appropriate action to maintain the proper function of the above listed system in accordance with the Individual Treatment System General Permit ARG550000.

Signature <i>Renee Campbell</i>	Date <i>3-20-17</i>
Typed/Printed Name <i>Renee Campbell</i>	License Number <i>5W 56</i> (Min. Class II License)
	Phone Number <i>870 962-3300</i>

ADEQ

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

May 16, 2017

Derek Ratchford, Area Manager
Anthony Forest Products Company, LLC
P.O. Box 724
Strong, AR 71765

RE: Anthony Forest Products - Response to Inspection (Union Co)
AFIN: 70-00473 **NPDES Permit No.: AR0047384**
ARG550398
ARG550540
ARR000977

Dear Mr. Ratchford:

I have reviewed the response pertaining to my February 6, 2017 inspection of Anthony Forest Products, LLC – Urbana Mill. 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 youngm@adeq.state.ar.us.

Sincerely,



Michael Young
District 8 Field Inspector
Office of Water Quality