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

WATER DIVISION INSPECTION REPORT

AFIN: **70-00473** | PERMIT #: **ARR000977** | DATE: **2/6/2017**

COUNTY: **70 Union** | PDS #: **095668** | MEDIA: **WN**

GPS LAT: **33.159614** LONG: **-92.443849** LOCATION: **Entrance**

FACILITY INFORMATION

NAME:
Anthony Forest Products Compan
LOCATION:
1236 Urbana Road
CITY:
El 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: **1 - Unsatisfactory**
INSPECTION TYPE: **Industrial Stormwater**
DATE(S): **2/6/2017**
ENTRY TIME: **09:30**
EXIT TIME: **14:00**
PERMIT EFFECTIVE DATE: **1/1/2014**
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	**N**	FLOW MEASUREMENT	**M**	STORMWATER
S	RECORDS/REPORTS	**S**	LABORATORY	**U**	FACILITY SITE REVIEW
M	OPERATION & MAINTENANCE	**U**	EFFLUENT/RECEIVING WATER	**U**	SELF-MONITORING PROGRAM
S	SAMPLING	**N**	SLUDGE HANDLING/DISPOSAL	**N**	PRETREATMENT
****	OTHER:				

SUMMARY OF FINDINGS

1.) The facility has a kiln ash pile with no control measures that is contributing to pollution of UT of Woodard Creek (see Photos 1-4; Figure 1). This is a violation of Arkansas Water and Air Pollution Act 472 A.C.A. § 8-4-217 (a)(2), which states, "It shall be unlawful for any person to place or cause to be placed any sewage, industrial waste, or other wastes in a location where it is likely to cause pollution of any waters of this state." SEE KILN ASH COMMENTS

2.) The facility has contributed kiln ash bottom deposits to UT of Woodard Creek through insufficient control measures (see Photos 1-4; Figure 1). This is a violation of APC&EC Regulation 2.408, which states "Receiving waters shall have no distinctly visible solids, scum or foam of a persistent nature, nor shall there be any formation of slime, bottom deposits or sludge banks." SEE KILN ASH COMMENTS

3.) The facility is not making an effort to minimize exposure of the kiln ash pile, which is contributing to pollution of UT of Woodard Creek from Outfall 011 (see Photos 1-4; Figure 1). This is a violation of permit condition Part 3.1.1. SEE KILN ASH COMMENTS

4.) Oil sheen was observed in the ditch draining to Outfall 003 from the kiln area (see Photos 8-15). 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. This is a violation of permit conditions Part 3.1.1., 3.1.2. and 3.1.3. SEE OUTFALL 003 COMMENTS

4.) Erosion and sediment controls are not being utilized in the ditch that drains Outfall 008 (see Photos 5-7; Figure 2). This is a violation of 3.1.5. SEE OUTFALL 008 COMMENTS

5.) The facility is not managing runoff at Outfall 011 in a manner to minimize the pollutants discharged to UT of Woodard Creek (see Photos 1-4; Figure 1). This is a violation of permit condition Part 3.1.6. SEE KILN ASH

COMMENTS

6.) Sampling of Outfall 011 is not taking place and it has the greatest exposure to significant sources of pollution (kiln ash). This is a violation of permit condition Part 3.8. SEE OUTFALL 011 COMMENTS

GENERAL COMMENTS

On February 6, 2017, I performed an inspection at Anthony Forest Products Company – Urbana Sawmill. The inspection was completed with Randy Evans, EHS Manager, and Amanda Gallagher, Environmental Engineer with GBMc. GBMc is contracted to perform inspections, sampling, and SWPPP updates. Training is completed by Mr. Evans. The SWPPP and site map was up to date and all Stormwater Annual Reports (SWARs) were completed with associated sampling COCs, laboratory bench sheets, and information. Outfalls 003 and 008 have had some benchmark parameters exceeded in the past three years, but corrective action reports were included with the exceedances. Outfalls 002-012 are indicated as Stormwater Outfalls in the SWPPP and outfalls sampled are 003, 007, and 008.

Note: Outfall 012 is not included on the Notice of Coverage (NOC) but is on the Notice of Intent (NOI) submitted for the permit. Contact ADEQ Office of Water Quality Permits Branch to have Outfall 012 added to the NOC.

KILN ASH COMMENTS:

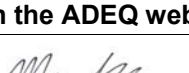
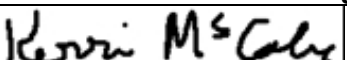
During the inspection, I observed runoff at Outfall 011 from a pile of kiln ash that lacked control measures (see Photo 1; Figure 1). The contributing industrial waste material and associated pollutants were observed in UT of Woodard Creek creating excessive bottom deposits (see Photos 3-4). This area needs to have control measures added and photos need to be submitted as a response to the violation.

OUTFALL 003 COMMENTS:

During the inspection, I observed Outfall 003 and the ditch that drained to the outfall. I immediately observed excessive oil sheen in the ditch (see Photos 8-11). We traced the source of the sheen to a pile of grease (see Photo 12) and unknown sources from near the kiln loading area (see Photos 13-15). The kiln loader had a bearing that was excessively greased. Housekeeping and maintenance may need to be updated in this area to prevent a discharge of oil sheen to Outfall 003. It was noted that there have been no exceedances for Oil and Grease (O&G) at Outfall 003. As a response to this violation, a photo of the pile of grease removed and a housekeeping/maintenance plan for the area is required. Ms. Gallagher stated that this area would be observed during the next quarterly inspection for oil sheen and housekeeping.

OUTFALL 008 COMMENTS:

During the inspection, I observed the ditch feeding Outfall 008 to have very little vegetation and no velocity control measures mid-channel (see Photos 5-6). The ditch flattens out near Outfall 008 and there is better vegetative cover to allow control of bark and other materials to accumulate (see Photo 7). There was discussion during the inspection of possibly routing the ditch to an abandoned wet deck pond that discharges to Outfall 009 and would allow the pond to be used as a stormwater pond BMP. As response to this inspection, please submit photos of control measures (stabilization by seeding, velocity control devices, etc.) in the ditch draining to Outfall 008. If any future changes are made to this outfall, remember to submit proper Outfall Modification Forms found on the ADEQ website.

INSPECTOR'S SIGNATURE: 	**Michael Young**	DATE: **2/9/2017**
SUPERVISOR'S SIGNATURE: 	**Kerri McCabe**	DATE: **3/3/2017**

Inspection Form Legend:

S = Satisfactory, M = Marginal, U = Unsatisfactory, Y = Yes, N = No, NI = Not Implemented, NA = Not Applicable, NE = Not Evaluated –

If Y and a NI are check it means it is in the SWPPP but not implemented in the field which is a violation.

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ¨ M ¨ U ¨ NA ¨ NE
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y ¨ N ¨ NA ¨ NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	¨ Y ¨ N ☑NA ¨ NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y ¨ N ¨ NA ¨ NE
4. ALL DISCHARGES ARE PERMITTED:	☑Y ¨ N ¨ NA ¨ NE

Comments:

SECTION B: STORM WATER POLLUTION PREVENTION PLAN EVALUATION

PERMITTEE SWPPP MEETS PERMIT REQUIRMENTS	☑S ¨ M ¨ U ¨ NA ¨ NE
1. Is the SWPPP available for review by ADEQ? (Part 4.4)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
2. Has SWPPP been updated since 07/01/2014, or later if required? (Part 4.1, Part 4.5)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
3. Does the SWPPP contain facility name, general permit tracking number, facility physical address, and SIC and NAICS codes? (Part 4.2.1)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
4. Pollution Prevention Team	
A. Does the SWPPP identify specific individuals or positions?(Part 4.2.2)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
B. Does the SWPPP outline the responsibilities of each member of the Pollution Prevention Team? (Part 4.2.2)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
5. Does the SWPPP contain a facility description (process diagram, general layout, storage of raw materials, the flow of goods and materials through the facility and seasonal variations)? (Part 4.2.3)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
6. Does the facility site map contain the following items?	
A) The size of the property in acres? (Part 4.2.3.1)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
B) The location and extent of significant structures and impervious surfaces? (Part 4.2.3.2)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
C) The direction of stormwater flow using arrows? (Part 4.2.3.3)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
D) The locations of all existing structural control measures? (Part 4.2.3.4)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
E) The locations of all receiving wasters in the immediate vicinity of the facility? (Part 4.2.3.5)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
F) The locations of all stormwater conveyances including ditches, pipes, and swales? (Part 4.2.3.6)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
G) The locations of potential pollutant sources? (Part 4.2.3.7)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
H) The locations of all stormwater monitoring points? (Part 4.2.3.8)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
I) The locations of stormwater inlets and outfalls with unique identification code for each outfall with indications if one or more outfall is being treated as "substantially identical" and an approximate outline of the areas draining to each outfall? (Part 4.2.3.9)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
J) Where the stormwater discharges to municipal separate storm sewer system (MS4), if applicable? (Part 4.2.3.10)	¨ Y ¨ N ¨ NI ☑NA ¨ NE
K) The locations and descriptions of all non-stormwater discharges identified in the SWPPP? (Part 4.2.3.11)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
L) The locations of the following activities if they are exposed to precipitation? (Part 4.2.3.12)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Fueling Stations	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Vehicle and equipment maintenance and/or cleaning areas	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Loading and unloading areas	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Locations used for the treatment, storage, or disposal of waste	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Liquid storage tanks	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Processing and storage areas	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-byproducts used or created by the facility	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Transfer areas for substances in bulk	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Machinery	☑Y ¨ N ¨ NI ¨ NA ¨ NE
M) The locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants? (Part 4.2.3.13)	¨ Y ¨ N ¨ NI ☑NA ¨ NE

7. A description of potential pollutant sources	
A) A list of industrial activities exposed to stormwater (Part 4.2.4.1)	☑Y ¨N ¨NI ¨NA ¨NE
B) A list of pollutants associated with each identified activity, including all significant materials that have been handled, treated, stored, or disposed, and that have been exposed to stormwater in the 3 years prior to the SWPPP date (Part 4.2.4.2)	☑Y ¨N ¨NI ¨NA ¨NE
C) Locations where spills/leaks could occur that may contribute pollutants to stormwater discharges and the corresponding outfall(s) (Part 4.2.4.3)	☑Y ¨N ¨NI ¨NA ¨NE
D) A list of significant spills and significant leaks of toxic or hazardous pollutants that have occurred in areas exposed to precipitation or drained to a stormwater conveyance for three years prior to the SWPPP date (Part 4.2.4.3)	¨Y ¨N ¨NI ☑NA ¨NE
E) Measures to identify and eliminate Non-stormwater Discharges (Part 4.2.4.4)	☑Y ¨N ¨NI ¨NA ¨NE
F) Certification that outfalls have been tested for illicit Non-stormwater Discharges (Part 4.2.4.4)	☑Y ¨N ¨NI ¨NA ¨NE
G) Location of storage piles containing salt used for deicing or other commercial or industrial purposes (Part 4.2.4.5)	¨Y ¨N ¨NI ☑NA ¨NE
H) A summary of existing discharge sampling data (Part 4.2.4.6)	☑Y ¨N ¨NI ¨NA ¨NE
8. Measures and Controls (Part 4.2.5)	
A) Does SWPPP describe stormwater controls appropriate for the facility?	☑Y ¨N ¨NI ¨NA ¨NE
B) Have the selected controls been implemented? – No vegetation in ditches, no controls on ash pile	¨Y ☑N ¨NI ¨NA ¨NE
9. Documentation of:	
A) Good Housekeeping (Part 4.2.6.1.1)	☑Y ¨N ¨NI ¨NA ¨NE
B) Preventative Maintenance (Part 4.2.6.1.2)	☑Y ¨N ¨NI ¨NA ¨NE
C) Spills and Response Procedures (Part 4.2.6.1.3)	☑Y ¨N ¨NI ¨NA ¨NE
D) Employee Training (Part 4.2.6.1.4)	☑Y ¨N ¨NI ¨NA ¨NE
E) Monitoring – Benchmark, ELG, other (Part 4.2.6.2.1)	☑Y ¨N ¨NI ¨NA ¨NE
F) Sample Location(s), Parameters, Limits, and Procedures (Part 4.2.6.2.2)	☑Y ¨N ¨NI ¨NA ¨NE
G) Inspections (Part 4.2.6.3)	☑Y ¨N ¨NI ¨NA ¨NE
a. Routine	☑Y ¨N ¨NI ¨NA ¨NE
b. Comprehensive	☑Y ¨N ¨NI ¨NA ¨NE
c. Name of Inspector	☑Y ¨N ¨NI ¨NA ¨NE
d. Schedule for Inspections	☑Y ¨N ¨NI ¨NA ¨NE
e. Specific items inspected, including outfalls	☑Y ¨N ¨NI ¨NA ¨NE
10. Does stormwater discharge to a 303(d) listed or TMDL stream? (Part 4.2.7.1)	¨Y ☑N ¨NI ¨NA ¨NE
If yes, are additional requirement met?	¨Y ¨N ¨NI ☑NA ¨NE
11. Does stormwater direct discharge to an ERW, NSW, or ESW? (Part 4.2.7.2)	¨Y ☑N ¨NI ¨NA ¨NE
If yes, are additional requirement met?	¨Y ¨N ¨NI ☑NA ¨NE
12. Is the SWPPP signed and certified? (Part 4.2.8)	☑Y ¨N ¨NI ¨NA ¨NE
Comments:	

SECTION C: MONITORING & INSPECTIONS

PERMITTEE MONITORING MEETS PERMIT REQUIRMENTS	¨S ¨M ¨U ¨NA ¨NE
1. Is the facility one of the four Effluent Guideline Facilities in the Permit? (Cement MFG, Fertilizer MFG, Steam Electric coal pile, Paving and Roofing Materials, or Airport Deicing)(Part 3.3.1)	¨Y ☑N ¨NI ¨NA ¨NE
A) Are all outfalls from the regulated process being sampled? (Part 3.3.2)	¨Y ¨N ¨NI ☑NA ¨NE
B) If coal pile run off is monitored, are all other stormwater flows excluded? (Part 3.3.1)	¨Y ¨N ¨NI ☑NA ¨NE
C) If airport with annual jet departures ≥ 1000, is effluent limit met? (Part 3.3.1)	¨Y ¨N ¨NI ☑NA ¨NE
B) If airport, is at least 60% of deicing fluid collected? (Part 3.3.1)	¨Y ¨N ¨NI ☑NA ¨NE
2. Which of the monitoring categories is this facility subject to: (Parts 1.5, 3.4)	
A) Are samples being collected for each monitoring period (annually)? (Part 3.6)	☑Y ¨N ¨NI ¨NA ¨NE
B) Are samples being collected from the location specified in the NOI and SWPPP (Part 3.7)	☑Y ¨N ¨NI ¨NA ¨NE
C) Has the permittee determined that some of the outfalls are similar? (Part 3.8.1)	☑Y ¨N ¨NI ¨NA ¨NE
Are the conditions on the ground still the same as documented for the similar outfalls (Part 3.8.1)	¨Y ☑N ¨NI ¨NA ¨NE
D) Are all parameters for the monitoring category being sampled and analyzed? (Part 3.4)	☑Y ¨N ¨NI ¨NA ¨NE
E) Were the samples collected during a measureable storm event? (Part 3.8.2.2)	☑Y ¨N ¨NI ¨NA ¨NE
F) Were the samples properly preserved and analyzed? (Part 3.8.2.4)	☑Y ¨N ¨NI ¨NA ¨NE
G) Are the sample locations suitable for the collection of a representative sample? (Part 3.8.2)	☑Y ¨N ¨NI ¨NA ¨NE

3. Has any of the monitoring revealed an exceedance of the benchmark values for this facility?(Part 3.12.1)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
A) Has a process to develop a corrective action plan been started within 30 days of exceedances? (Part 3.12.1)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
B) Is the exceedance attributed to natural background pollutant level? (Part 3.12.2)	¨ Y ☑N ¨ NI ¨ NA ¨ NE
C) If the exceedance is naturally occurring, has the Department been notified? (Part 3.12.2.3)	¨ Y ☑N ¨ NI ¨ NA ¨ NE
4. Inspections (Part 5.1)	
A) Visual Site Inspections (minimum 4/year) (Part 5.1.1)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
B) At least one visual inspection conducted during a rain event	☑Y ¨ N ¨ NI ¨ NA ¨ NE
C) Inspections recorded and include: date of inspection, person doing inspection; major observations, and corrective actions required.	☑Y ¨ N ¨ NI ¨ NA ¨ NE
D) Comprehensive Site Compliance Evaluation (Annual) (Part 5.1.2)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Comments:	

SECTION D: RECORD KEEPING

PERMITTEE RECORD KEEPING AND REPORTING MEETS PERMIT REQUIRMENTS	☑S ¨ M ¨ U ¨ NA ¨ NE
1. Has SWAR for the previous year of monitoring been completed? (Part 5.2.4)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Include sample results, lab reports, chain of custody?	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Significant findings of inspections?	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Summary of corrective action plans?	☑Y ¨ N ¨ NI ¨ NA ¨ NE
2. Is the SWAR signed? (Part 5.2.4.5)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
3. Is permittee keeping copies of inspections? (Part 5.2.1)	☑Y ¨ N ¨ NI ¨ NA ¨ NE
Comments:	

SECTION E: FACILITY TOUR

PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS	¨ S ¨ M ☑U ¨ NA ¨ NE
1. Any evidence of spills or leaks that have not been properly cleaned up as required by the SWPPP?	☑Y ¨ N ¨ NI ¨ NA ¨ NE
2. Any evidence of erosion or un-stabilized ground?	☑Y ¨ N ¨ NI ¨ NA ¨ NE
3. Any controls, structures, or storage areas that are not as identified in the SWPPP?	☑Y ¨ N ¨ NI ¨ NA ¨ NE
4. Any non-stormwater discharges not identified in the SWPPP? (see Part 1.6 of permit for list of allowable non-stormwater discharges)	¨ Y ☑N ¨ NI ¨ NA ¨ NE
5. Any non-stormwater discharges that are not allowed under this permit? (see Part 1.6 of permit for list of allowable non-stormwater discharges)	¨ Y ☑N ¨ NI ¨ NA ¨ NE
6. Are BMPs being properly operated and maintained? (Part 7.17)	¨ Y ☑N ¨ NI ¨ NA ¨ NE
7. Are housekeeping procedures being implemented and are they sufficient?	¨ Y ☑N ¨ NI ¨ NA ¨ NE
8. Toxicity testing recommended? (Part 6)	¨ Y ☑N

Comments: Outfall 011 had excessive kiln ash deposits in the receiving stream and no control measures on the ash pile. Outfalls 008 and 003 had ditches that need better control measures.

Water Division Photographic Evidence Sheet					
Location:	**Anthony Forest Products Company – Urbana Sawmill**				
Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:12**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**1**
Description:	**Drainage immediately adjacent to kiln ash pile. Directional arrows indicate flow.**				

Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:12**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**2**
Description:	**Viewing upstream of drainage from Outfall 011 and kiln ash pile. Note clarity of water and lack of bottom deposits.**				

Water Division Photographic Evidence Sheet					
Location:	**Anthony Forest Products Company – Urbana Sawmill**				
Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:13**
Witness:	**Amanda Gallagher; Tobin Fulmer**			Photo #:	**3**
Description:	**Continuing drainage of Outfall 011 draining area of kiln ash pile. Note bottom deposits.**				

Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:13**
Witness:	**Tobin Fulmer**			Photo #:	**4**
Description:	**UT of Woodard Creek with excessive bottom deposits from unmanaged kiln ash pile runoff.**				

Water Division Photographic Evidence Sheet					
Location:	**Anthony Forest Products Company – Urbana Sawmill**				
Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:29**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**5**
Description:	**Drainage ditch to Outfall 008. Note lack of control measures.**				

Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:29**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**6**
Description:	**View downstream of ditch draining to Outfall 008. Note lack of control measures.**				

Water Division Photographic Evidence Sheet					
Location:	**Anthony Forest Products Company – Urbana Sawmill**				
Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:37**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**7**
Description:	**Viewing upstream from Outfall 008. Note excessive wood chips and materials.**				

Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:52**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**8**
Description:	**Oil sheen present in ditch draining to Outfall 003.**				

Water Division Photographic Evidence Sheet					
Location:	**Anthony Forest Products Company – Urbana Sawmill**				
Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:52**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**9**
Description:	**Oil sheen present in ditch draining to Outfall 003.**				

Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:52**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**10**
Description:	**Oil sheen present in ditch draining to Outfall 003.**				

Water Division Photographic Evidence Sheet					
Location:	**Anthony Forest Products Company – Urbana Sawmill**				
Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:55**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**11**
Description:	**Oil sheen present in ditch draining to Outfall 003.**				

Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:57**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**12**
Description:	**Oil or grease on ground near kiln. Pile was contributing to sheen draining to Outfall 003.**				

Water Division Photographic Evidence Sheet					
Location:	**Anthony Forest Products Company – Urbana Sawmill**				
Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**12:59**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**13**
Description:	**Sheen on ground from unknown source. Drainage was contributing to sheen in ditch draining to Outfall 003.**				

Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**13:00**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**14**
Description:	**Sheen on ground from unknown source near kiln contributing to sheen at Outfall 003**				

Water Division Photographic Evidence Sheet					
Location:	**Anthony Forest Products Company – Urbana Sawmill**				
Photographer:	**Michael Young**	Date:	**02/06/2017**	Time:	**13:00**
Witness:	**Randy Evans; Amanda Gallagher; Tobin Fulmer**			Photo #:	**15**
Description:	**Sheen directly below chain driven kiln loader. Sheen was contributing to sheen observed at Outfall 003.**				

Figure 1. Overview of area that drains to Outfall 011. During the inspection, I observed a large pile of kiln ash that had a lack of control measures. The deposits from the kiln ash entered UT of Woodard Creek. The locations of the upstream (Photo 2) and downstream (Photo 1) images are indicated.

Figure 2. Drainage ditch that is had a lack of control measures and drains to Outfall 008. Control measures such as velocity dissipation devices and vegetation would adequately control wood chips and other materials from entering Woodard Creek.

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 and 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 maintenanced 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 maintenanced 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 as clean out as part 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 discharge 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 maintenanced 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

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
Date of Evaluation 3/20/2017

ARG550000 Individual Treatment System Evaluation

Part 1 General Information

Permittee: Crawford	County: Conway	Phone Number: 870 962 3[illegible]
Site Location (911 Address): 135 Union Rd	City: Urban	State: AR Zip: [illegible]

Part 2 Assessment

Items:		Description: In the space below, list any deficiency assessed and/or action(s) taken.
1 Electrical	☑	
2 Pump(s)	☑	
3 Discharge Route	☑	
4 Chlorinator	☑	
5 Contact Chamber	☑	
6 Clean Outs	☐	
7 Sludge Depth	☑	18" of sludge
8 Other Components	☐	

Part 3 Sludge Removal

1 Solids Removal Service	2 License Number	3 Date of Service

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: Renee Crawford	Date: 3-20-17	
Typed/Printed Name: Renee Crawford	License Number: SW 56 (Min. Class II License) _____	Phone Number: 870 962-3[illegible]

ADEQ
ARKANSAS
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