



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

WATER DIVISION INSPECTION REPORT

AFIN: 26-00234	PERMIT #: ARR00A633	DATE: 3/29/2018
COUNTY: Garland	PDS #: 102672	MEDIA: WN
GPS LAT: 34.523159 LONG: -93.124913 LOCATION: General Area		

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: ORG Chem Group, LLC LOCATION: 847 Blacksnake Rd CITY: Hot Springs, AR 71914	FACILITY TYPE: 2 - Industrial INSPECTOR ID#: 34689 S - State FACILITY EVALUATION RATING: N INSPECTION TYPE: Industrial Stormwater
	DATE(S): 3/29/2018 ENTRY TIME: 10:25 EXIT TIME: 12:45 PERMIT EFFECTIVE DATE: 7/1/2014 PERMIT EXPIRATION DATE: 6/30/2019
RESPONSIBLE OFFICIAL	
NAME / TITLE: Kevin Harris / V.P. COMPANY: ORG Chem Group, LLC MAILING ADDRESS: 2406 Lynch Rd CITY, STATE, ZIP: Evansville IN 47711 PHONE & EXT. / FAX: (512)476-4869 / EMAIL: kharris@chem-group.com rreed@chem-group.com LNiemeyer@chem-group.com	FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N
CONTACTED DURING INSPECTION: No	INSPECTION PARTICIPANTS
	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Mr. Robert Reed/ Plant Mgr./(812)759-8425 Ms. Lisa Niemeyer/ EH&S/ via email

AREA EVALUATIONS					
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
S	PERMIT	N	FLOW MEASUREMENT	S	STORMWATER
N	RECORDS/REPORTS	N	LABORATORY	M	FACILITY SITE REVIEW
N	OPERATION & MAINTENANCE	N	EFFLUENT/RECEIVING WATER	N	SELF-MONITORING PROGRAM
N	SAMPLING	N	SLUDGE HANDLING/DISPOSAL	N	PRETREATMENT
N	OTHER:				

SUMMARY OF FINDINGS

1. Some of the facility secondary containment structures need repair and routine maintenance. This is a violation of Part 7.17.1 of the permit. I photographed one temporary containment structure which was full and needed the stormwater removed, one temporary structure which had collapsed, and a concrete structure which was leaking stormwater at the time of inspection. There were a few other cracks in concrete containment structures which I did not observe leaking but should be monitored and repaired as needed (see Photos 2, 3, and 5).

GENERAL COMMENTS

Introduction

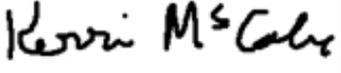
I inspected on March 29, 2018 in response to a complaint received alleging the facility has allowed spills to flow into a holding pond and then discharge to Lake Hamilton. It appears the complainant is referring to Outfall #001 at the southeast corner of the facility where there is a small settling basin. I did not see evidence of significant spills at the time of inspection. I did see evidence of a previous spill at a tote northeast of Outfall #002; however, I did not see any discharge or leak at the time of inspection. It appeared the facility had addressed this prior to my inspection (Photo 4). Mr. Robert Reed (Plant Manager) represented the facility during the inspection and led the facility tour.

Records Review

I reviewed the facility Stormwater Pollution Prevention Plan (SWPPP), sample collection and custody sheets, lab analysis sheets, facility inspections, annual comprehensive inspection, and Stormwater Annual Report (SWAR) with Mr. Reed. The SWPPP had not been updated at the time of inspection and I was informed the facility was currently updating the SWPPP. An updated SWPPP was received April 5, 2018. The updated SWPPP included all needed information and signatures.

Facility Inspection

Mr. Reed led a tour of the facility. The facility primarily relies on spill prevention and containment to minimize stormwater pollutants. I focused primarily on facility containment structures as well as looking for evidence of chemical spills. I also observed both stormwater outfalls. The facility maintains spill kits at the outfalls.

INSPECTOR'S SIGNATURE: 	Travis Harmon	DATE: 4/16/2018
SUPERVISOR'S SIGNATURE: 	Kerri McCabe	DATE: 5/2/2018

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	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
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
Comments:	
SECTION B: STORM WATER POLLUTION PREVENTION PLAN EVALUATION	
PERMITTEE SWPPP MEETS PERMIT REQUIRMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Is the SWPPP available for review by ADEQ? (Part 4.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
2. Has SWPPP been updated since 07/01/2014, or later if required? (Part 4.1, Part 4.5) Updated SWPPP received April 5, 2018 via email	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Does the SWPPP contain facility name, general permit tracking number, facility physical address, and SIC and NAICS codes? (Part 4.2.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
4. Pollution Prevention Team	
A. Does the SWPPP identify specific individuals or positions?(Part 4.2.2) Personnel updated to current staff in SWPPP received April 5, 2018	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B. Does the SWPPP outline the responsibilities of each member of the Pollution Prevention Team? (Part 4.2.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> 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)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
6. Does the facility site map contain the following items?	
A) The size of the property in acres? (Part 4.2.3.1) listed in updated SWPPP at 13.65 acres	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) The location and extent of significant structures and impervious surfaces? (Part 4.2.3.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) The direction of stormwater flow using arrows? (Part 4.2.3.3)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
D) The locations of all existing structural control measures? (Part 4.2.3.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
E) The locations of all receiving waters in the immediate vicinity of the facility? (Part 4.2.3.5)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
F) The locations of all stormwater conveyances including ditches, pipes, and swales? (Part 4.2.3.6)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
G) The locations of potential pollutant sources? (Part 4.2.3.7)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
H) The locations of all stormwater monitoring points? (Part 4.2.3.8)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> 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)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
J) Where the stormwater discharges to municipal separate storm sewer system (MS4), if applicable? (Part 4.2.3.10)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
K) The locations and descriptions of all non-stormwater discharges identified in the SWPPP? (Part 4.2.3.11)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
L) The locations of the following activities if they are exposed to precipitation? (Part 4.2.3.12)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Fueling Stations	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Vehicle and equipment maintenance and/or cleaning areas	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Loading and unloading areas	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Locations used for the treatment, storage, or disposal of waste	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Liquid storage tanks	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Processing and storage areas	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> 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	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Transfer areas for substances in bulk	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Machinery	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> 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)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE

7. A description of potential pollutant sources	
A) A list of industrial activities exposed to stormwater (Part 4.2.4.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> 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)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> 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)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> 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)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
E) Measures to identify and eliminate Non-stormwater Discharges (Part 4.2.4.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
F) Certification that outfalls have been tested for illicit Non-stormwater Discharges (Part 4.2.4.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
G) Location of storage piles containing salt used for deicing or other commercial or industrial purposes (Part 4.2.4.5)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
H) A summary of existing discharge sampling data (Part 4.2.4.6)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
8. Measures and Controls (Part 4.2.5)	
A) Does SWPPP describe stormwater controls appropriate for the facility?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Have the selected controls been implemented?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
9. Documentation of:	
A) Good Housekeeping (Part 4.2.6.1.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Preventative Maintenance (Part 4.2.6.1.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) Spills and Response Procedures (Part 4.2.6.1.3)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
D) Employee Training (Part 4.2.6.1.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
E) Monitoring – Benchmark, ELG, other (Part 4.2.6.2.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
F) Sample Location(s), Parameters, Limits, and Procedures (Part 4.2.6.2.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
G) Inspections (Part 4.2.6.3)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
a. Routine	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
b. Comprehensive	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
c. Name of Inspector	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
d. Schedule for Inspections	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
e. Specific items inspected, including outfalls	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
10. Does stormwater discharge to a 303(d) listed or TMDL stream? (Part 4.2.7.1)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
If yes, are additional requirement met?	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
11. Does stormwater direct discharge to an ERW, NSW, or ESW? (Part 4.2.7.2)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
If yes, are additional requirement met?	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
12. Is the SWPPP signed and certified? (Part 4.2.8)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE

Comments:

SECTION C: MONITORING & INSPECTIONS

PERMITTEE MONITORING MEETS PERMIT REQUIRMENTS	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> 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)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
A) Are all outfalls from the regulated process being sampled? (Part 3.3.2)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B) If coal pile run off is monitored, are all other stormwater flows excluded? (Part 3.3.1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
C) If airport with annual jet departures ≥ 1000, is effluent limit met? (Part 3.3.1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
B) If airport, is at least 60% of deicing fluid collected? (Part 3.3.1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
2. Which of the monitoring categories is this facility subject to: (Parts 1.5, 3.4)	D2 (SWPPP also lists C5 & D1)
A) Are samples being collected for each monitoring period (annually)? (Part 3.6)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Are samples being collected from the location specified in the NOI and SWPPP (Part 3.7)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) Has the permittee determined that some of the outfalls are similar? (Part 3.8.1)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Are the conditions on the ground still the same as documented for the similar outfalls (Part 3.8.1)	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE
D) Are all parameters for the monitoring category being sampled and analyzed? (Part 3.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
E) Were the samples collected during a measureable storm event? (Part 3.8.2.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
F) Were the samples properly preserved and analyzed? (Part 3.8.2.4)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE

G) Are the sample locations suitable for the collection of a representative sample? (Part 3.8.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Has any of the monitoring revealed an exceedance of the benchmark values for this facility?(Part 3.12.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
A) Has a process to develop a corrective action plan been started within 30 days of exceedances? (Part 3.12.1) COD 140 mg/l in 2017	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) Is the exceedance attributed to natural background pollutant level? (Part 3.12.2)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) If the exceedance is naturally occurring, has the Department been notified? (Part 3.12.2.3)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
4. Inspections (Part 5.1)	
A) Visual Site Inspections (minimum 4/year) (Part 5.1.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
B) At least one visual inspection conducted during a rain event	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
C) Inspections recorded and include: date of inspection, person doing inspection; major observations, and corrective actions required.	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
D) Comprehensive Site Compliance Evaluation (Annual) (Part 5.1.2)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE

Comments:

Stormwater sampling and analyses of COD, pH, TSS, and O&G.

SECTION D: RECORD KEEPING

PERMITTEE RECORD KEEPING AND REPORTING MEETS PERMIT REQUIRMENTS	<input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Has SWAR for the previous year of monitoring been completed? (Part 5.2.4) 2016 available during inspection. Signed 2017 SWAR included in updated SWPPP.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Include sample results, lab reports, chain of custody? Reviewed at facility	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Significant findings of inspections?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
Summary of corrective action plans?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
2. Is the SWAR signed? (Part 5.2.4.5)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Is permittee keeping copies of inspections? (Part 5.2.1)	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE

Comments:

SECTION E: FACILITY TOUR

PERMITTEE FACILITY TOUR MEETS PERMIT REQUIRMENTS	<input type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE
1. Any evidence of spills or leaks that have not been properly cleaned up as required by the SWPPP?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
2. Any evidence of erosion or un-stabilized ground?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
3. Any controls, structures, or storage areas that are not as identified in the SWPPP?	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
4. Any non-stormwater discharges <u>not</u> identified in the SWPPP? (see Part 1.6 of permit for list of allowable non-stormwater discharges)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> 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)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
6. Are BMPs being properly operated and maintained? (Part 7.17) Part 7.17.1 of permit.	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
7. Are housekeeping procedures being implemented and are they sufficient?	<input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NI <input type="checkbox"/> NA <input type="checkbox"/> NE
8. Toxicity testing recommended? (Part 6)	<input type="checkbox"/> Y <input checked="" type="checkbox"/> N

Comments:

Facility needs to repair cracks in containment structures (one discharging stormwater during inspection). Also, containment structures need maintenance at Lot 63 in updated SWPPP map (west-side of facility). One structure was full of stormwater and another nearby had collapsed.

I also observed an area where it appeared there had been a previous spill/leak as evidenced by dead vegetation. This was located at the south-end of the covered tank farm and northeast of Outfall #002. I did not see any evidence of flow from or within the containment structure at the time of inspection, and I did not see any evidence of a leak from the tote at this location.

Water Division Photographic Evidence Sheet			
Location:	ORG Chem Group, LLC		
Photographer:	Travis Harmon	Date:	3/29/2018
Time:	1151	Witness:	Mr. Robert Reed
Photo #:	1	Description:	Crack in containment structure. No leak observed at the time of inspection, but facility should monitor and repair.
			
Photographer:	Travis Harmon	Date:	3/29/2018
Time:	1156	Witness:	Mr. Robert Reed
Photo #:	2	Description:	Containment structure is full of stormwater and does not have adequate capacity to contain potential spills.
			

Water Division Photographic Evidence Sheet

Location:	ORG Chem Group, LLC		
Photographer:	Travis Harmon	Date:	3/29/2018
Time:	1156		Photo #:
Witness:	Mr. Robert Reed	3	
Description:	Containment structure has collapsed and needs repair.		



03/29/2018 11:56

Photographer:	Travis Harmon	Date:	3/29/2018
Time:	1204		Photo #:
Witness:	Mr. Robert Reed	4	

Description:	Potential previous spill. I did not see any evidence of a leak at the time of inspection. It is possible a previous tote had leaked. Facility should visually monitor and consider a containment structure for the tote.
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03/29/2018 12:04

Water Division Photographic Evidence Sheet			
Location:	ORG Chem Group, LLC		
Photographer:	Travis Harmon	Date:	3/29/2018
Time:	1208		Photo #:
Witness:	Mr. Robert Reed		5
Description:	Leaking containment structure needs repair. I observed flow at the time of inspection at this location. Flow is coming from the area near the rock in the center of the photo.		
			

From: [Kevin Harris](#)
To: [Harmon, Travis](#); [Water-Inspection-Report](#)
Cc: [Lisa Niemeyer](#); [Robert Reed](#); [Keith Mangham](#)
Subject: ORG Chem Group, LLC; Hot Springs Plant; Formal Response to 3/29/18 ADEQ Stormwater Inspection
Date: Tuesday, May 15, 2018 4:38:30 PM
Attachments: [May 15, 2018 Letter to ADEQ re 3-29-18 Hot Springs SW Inspection.pdf](#)

Please see attached letter. I kindly request that receipt of this e mail be acknowledged.

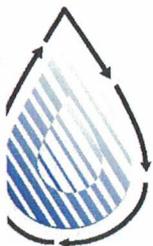
Thank you.

Kevin Harris

=====

Kevin D. Harris
Vice President & General Counsel
ORG Chem Group, LLC
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Evansville, Indiana 47711
kharris@chem-group.com
DD & Fax: 812.759.8333
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ORG Chem Group, LLC

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812-759-8222, Fax 501-767-6672

Corporate Office:
P.O. Box 3642, Evansville, IN 47735-3642
812-464-4446, Fax 812-465-5746

May 15, 2018

Mr. Travis Harmon
Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72218-5317

Industrial Stormwater Inspection of ORG Chem Group, LLC Hot Springs Plant; March 29, 2018; AFIN: 26-00234 ; NPDES Permit No. ARR00A633

Dear Mr. Harmon:

This written notification of corrective action is in response to the inspection report issued by your May 3, 2018 letter as a result of your inspection of our facility on March 29, 2018. In the “Summary of Findings”, there were noted the following items requiring corrective action. This letter will describe and document the course of action taken for each one.

SUMMARY OF FINDINGS: “Some of the facility secondary containment structures need repair and routine maintenance”; “There were a few other cracks in concrete containment structures which I did not observe leaking but should be monitored and repaired.”

ORG Chem Group Response: The facility has used a concrete sealer and repaired the containment wall. The other tank farm containments have been inspected by management and the routine maintenance mentioned has been completed. See photo 1 below.



Photo 1



SUMMARY OF FINDINGS ..."One temporary containment structure which was full and needed the stormwater removed,"

ORG Chem Group Response: The temporary containment structure in the above mentioned finding has had the stormwater inspected and drained per our stormwater plan. The temporary structures will be checked after each rain event and on a daily basis to keep rainwater from building up. See photo 2.



Photo 2

SUMMARY OF FINDINGS ..."One temporary structure had collapsed,"

ORG Chem Group Response: The aluminum brackets that hold the temporary structure in place had become bent. These brackets have been replaced or repaired and re-inserted. These berms will be checked daily to make sure the brackets and the containment are in good working order. See Photo 3 below.



Photo 3



SUMMARY OF FINDINGS: ...”and a concrete structure which was leaking stormwater at the time of inspection.”

ORG Chem Group Response: The corrective action for this concrete structure involved repairing a gap in the blind sump and seal inside of the sump with a concrete sealer. In addition to this, the yellow curbing has been sealed allowing this area to be contained. Grass seed has been sown to prevent future erosion. See photo 4 below.

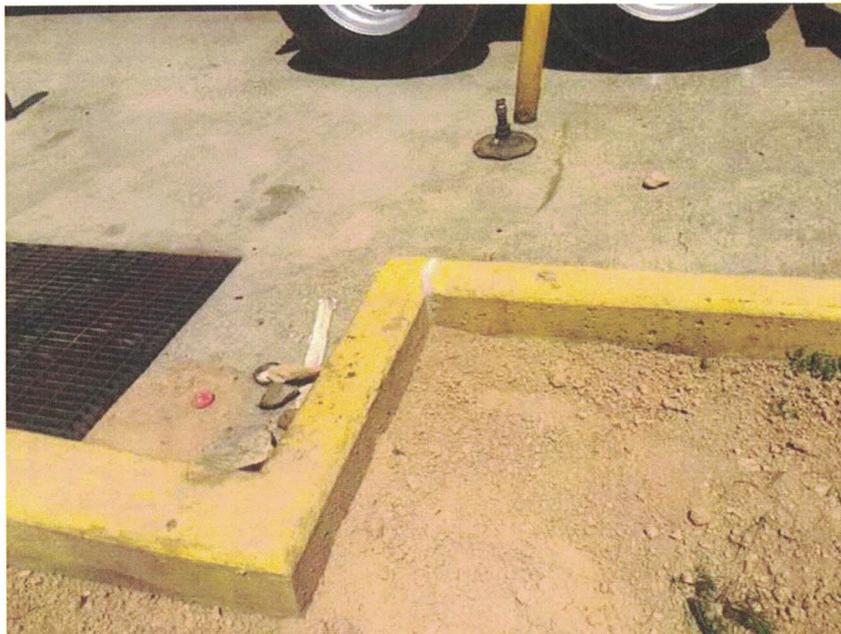


Photo 4

ORG Chem Group, LLC trusts this letter confirms the resolution of the above issues in your letter’s Summary of Findings. Thank you for your consideration in this matter. Please feel free to contact Ms. Lisa Niemeyer (lniemeyer@chem-group.com; Ph: (812) 759-8354), if you have any questions or wish to discuss this matter.

Sincerely,

Kevin Harris
Vice-President & General Counsel

Cc: Mr. Robert Reed, Plant Manager
Lisa Niemeyer, EHS Compliance Coordinator



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

June 15, 2018

Kevin Harris, V.P.
ORG Chem Group, LLC
2406 Lynch Rd
Evansville, IN 47711

RE: ORG Chem Group, LLC – Response to Inspection (Garland Co)
AFIN: 26-00234 NPDES Permit No.: ARR00A633

Dear Mr. Harris:

I have reviewed the response pertaining to my March 29, 2018 inspection of the ORG Chem Group, LLC facility in Hot Springs, Arkansas. The information provided sufficiently addresses the violations referenced in my inspection report. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (479) 968-7339 extension 14 or you may e-mail me at harmont@adeq.state.ar.us.

Sincerely,

A handwritten signature in cursive script that reads "Travis Harmon".

Travis Harmon
District 5 Field Inspector
Office of Water Quality