



# ARKANSAS

## ENERGY & ENVIRONMENT

July 1, 2022

Joanna Oneal, Controller  
Drew Foam Companies Inc.  
1093 Hwy 278 East  
Monticello, AR 71655  
Via email to: [joneal@drewfoam.com](mailto:joneal@drewfoam.com)

**RE: Drew Foam Companies Inc. Inspection (Drew Co)**  
**AFIN: 22-00057**                      **NPDES Permit No.: ARR000817**

Dear Ms. Oneal:

On April 21, 2022, I performed an Industrial Stormwater Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of the inspection report is enclosed for your records.


**Please refer to the “Summary of Findings” section of the inspection report and provide a written response for each item that was noted.** This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address below my signature or emailed to [Water-Inspection-Report@adeq.state.ar.us](mailto:Water-Inspection-Report@adeq.state.ar.us). This response should contain documentation describing the course of action taken to correct each item noted. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e., photos) is due by **July 21, 2022**.

If I can be of any assistance, please contact me at [Trey.Butler@adeq.state.ar.us](mailto:Trey.Butler@adeq.state.ar.us) or (501) 231-0062.

Sincerely,

A handwritten signature in black ink, appearing to read 'Trey Butler'.

Trey Butler  
Inspector, Office of Water Quality  
5301 Northshore Drive, North Little Rock, AR, 72118

 <p><b>ENVIRONMENTAL QUALITY</b></p>	<b>OFFICE OF WATER QUALITY INSPECTION REPORT</b>		
	AFIN: 22-00057	PERMIT #: ARR000817	DATE: 4/21/2022
	COUNTY: 22 Drew	PDS #: 120837	MEDIA: WN
	GPS LAT: 33.628247 LONG: -91.769367 LOCATION: General Area		
<b>FACILITY INFORMATION</b>		<b>INSPECTION INFORMATION</b>	
NAME: <b>Drew Foam Companies Inc.</b> LOCATION: <b>1093 HWY 278 East</b> CITY: <b>Monticello</b>		FACILITY TYPE: <b>2 - Industrial</b> INSPECTOR ID#: <b>141737 S - State</b> FACILITY EVALUATION RATING: <b>N</b> INSPECTION TYPE: <b>Industrial Stormwater</b>	
<b>RESPONSIBLE OFFICIAL</b>		DATE(S): <b>4/21/2022</b> ENTRY TIME: <b>10:00</b> EXIT TIME: PERMIT EFFECTIVE DATE: <b>7/1/2019</b> PERMIT EXPIRATION DATE: <b>6/30/2024</b>	
NAME / TITLE <b>Joanna Oneal / Controller</b> COMPANY: <b>Drew Foam Companies Inc.</b> MAILING ADDRESS: <b>1093 Hwy 278 East</b> CITY, STATE, ZIP: <b>Monticello AR 71655</b> PHONE & EXT: / FAX: <b>870-853-6575 /</b> EMAIL: <b>joneal@drewfoam.com</b>		<b>INSPECTION PARTICIPANTS</b>	
CONTACTED DURING INSPECTION: Yes		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>Cody Ballinger/ Maintenance Manager/ 870-209-4988/                  cballinger@drewfoam.com</b> <b>Ben White/Maintenance Supervisor/ 870-723-4235/                  bwhite@drewfoam.com</b> <b>Joanna Oneal/ Controller/ 870-853-6575/                  joneal@drewfoam.com</b>	
<b>SUMMARY OF FINDINGS</b>			
The following violations were noted at the time of inspection: <ol style="list-style-type: none"> <li>1) Housekeeping practices not implemented on east-side of facility. This includes excess garbage and scattered foam produced in the facility. This is a violation of Part 3.1.2 of the general permit.</li> <li>2) Facility Site Map was not included with the SWPPP. This is a violation of Part 4.2.3 of the general permit.</li> <li>3) Documentation of Routine and Comprehensive facility inspections were not maintained. This is a violation of Part 4.2.6.3 of the general permit.</li> </ol>			

**GENERAL COMMENTS**

On April 21, 2022, I performed an inspection of the above-mentioned facility's IGP. The facility is covered under Section Y2 of the general permit, which includes the manufacturing of miscellaneous plastic products. Specifically, this facility manufactures polystyrene foam products.


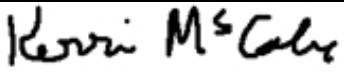
**Site Assessment:**

I arrived at the above-mentioned site at approximately 10:00 on April 21, 2022, and I was met by a Ms. Joanna Oneal. I was then introduced to a Mr. Cody Ballinger and Mr. Ben White, who escorted me to the office where the facility SWPPP and other documents were held. After a records review, Mr. White began the facility tour, where we began at the southeast portion of the building onsite. It was noticed at this point that there was excess garbage built up in the area, mostly in or around uncovered dumpsters. We then traveled towards the northeast portion of the property, where there was a large amount of foam scattered on the ground near a large waste container. Some of this foam, which was produced in the facility, had washed into a nearby drainage to Outfall 003. We then traveled around the north-side of the facility to Outfall 002. This outfall serves the northwest portion of the property and it had some litter present. Mr. White then showed to me Outfall 001, which serves the southwest portion of the property. According to the facility's permit, the location for Outfall 001 is located towards the center of the property. The actual location of the outfall is at the southwest corner of the parking lot to the west of the facility. It was discussed that this would be corrected using an Outfall Modification form, which can be found in the link included below. Finally, we traveled to Outfall 004, which was once the drainage for a parking lot on the east-side of the property. This parking lot is no longer in use and it has plenty of natural vegetation present.

[https://www.adeq.state.ar.us/water/permits/npdes/stormwater/pdfs/outfall\\_modification\\_form.pdf](https://www.adeq.state.ar.us/water/permits/npdes/stormwater/pdfs/outfall_modification_form.pdf)

**Records Review:**

The facility SWPPP and SWAR were available for review. However, the SWPPP did not include a site map or quarterly and comprehensive inspection records. There was only record of a visual inspection conducted in December 2021. Mr. White did inform me that he does regular inspections, but he has not kept an official record of them.

INSPECTOR'S SIGNATURE:  <b>Trey Butler</b>	DATE: <b>5/25/2022</b>
SUPERVISOR'S SIGNATURE:  <b>Kerri McCabe</b>	DATE: <b>6/30/2022</b>

Inspection Report: **Drew Foam Companies Inc.**, AFIN: **22-00057**, Permit #: **ARR000817**

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 checked it means it is in the SWPPP but not implemented in the field which is a violation.

<b>SECTION A: SWPPP &amp; SITE MAP REVIEW</b>		<b>" S " M " U " NA " NE</b>
1. Is the SWPPP available for review by ADEQ (Part 4.4)?		<input checked="" type="checkbox"/> Y " N " NI " NA " NE
A. If yes, when was the SWPPP last updated? <b>August 2019</b>		
2. Does the SWPPP identify specific individuals or positions as members of the Pollution Prevention Team, and does it outline the responsibilities of each team member (Part 4.2.2)?		<input checked="" type="checkbox"/> Y " N " NI " NA " NE
A. If yes, are the team members and positions current?		
		<input checked="" type="checkbox"/> Y " N " NI " NA " NE
3. Is the facility Site Map available for review (Part 4.2.3)?		" Y <input checked="" type="checkbox"/> N " NI " NA " NE
A. If yes, does the site map contain the following items, if applicable?		
i. The size of the property.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
ii. The location and extent of significant structures and impervious surfaces.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
iii. The direction of stormwater flow (ex. use of arrows, topographical maps).		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
iv. The locations of all existing structural control measures.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
v. The locations of all receiving waters in the immediate vicinity of the facility.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
vi. The locations of all stormwater conveyances including ditches, pipes, and swales.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
vii. The locations of potential pollutant sources.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
viii. Locations of all stormwater monitoring points.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
ix. The locations of stormwater inlets and outfalls.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
x. Where the stormwater discharges to Municipal Separate Storm Sewer System (MS4).		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
xi. The locations and descriptions of allowable non-stormwater discharges identified in the SWPPP.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
xii. The locations of the following activities if they are exposed to precipitation.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
a. Fueling Stations		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
b. Vehicle and equipment maintenance and/or cleaning areas		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
c. Loading and unloading areas		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
d. Locations used for the treatment, storage, or disposal of waste		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
e. Liquid storage tanks		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
f. Processing and storage areas		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
g. Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste materials, or byproducts used or created by the facility.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
h. Transfer areas for substances in bulk		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
i. Locations of storage piles containing salt used for deicing or other commercial or industrial purposes.		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
xiii. 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 <input checked="" type="checkbox"/> NA " NE
4. Does the stormwater discharge from the facility enter a waterbody that is listed on the most recently approved 303(d) list or has an approved TMDL?		<input checked="" type="checkbox"/> Y " N " NI " NA " NE
A. If yes, provide the name of the waterbody. <b>Bayou Bartholomew</b>		
5. Does the SWPPP address one or more of the measures listed in Part 4.2.7.1.1 – 4?		<input checked="" type="checkbox"/> Y " N " NI " NA " NE
A. If yes, describe the measures identified in the SWPPP. <b>Pollutant not present at facility</b>		
6. Does the stormwater from the facility directly discharge to an ERW, NSW, or ESW?		<input checked="" type="checkbox"/> Y " N " NI " NA " NE
A. If yes, provide the name of the waterbody.		
B. Does the SWPPP document the name of the listed waterbody and the approximate distance between the outfall and the listed waterbody?		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
i. If yes, provide the approximate distance between the waterbody and the outfall(s) (Part 4.2.7.2.1).		
C. Does the SWPPP incorporate additional BMPs needed to prevent to the maximum extent practicable exposure of pollutants to stormwater that could potentially impact water quality?		" Y " N " NI <input checked="" type="checkbox"/> NA " NE
i. If yes, describe each BMP that is implemented.		

Comments:	
<b>SECTION B: MONITORING, INSPECTIONS, and RECORD KEEPING</b>	<b>" S " M " U " NA " NE</b>
1. Provide the Sector/Sub-Sector listed for the facility. <u>Y2</u>	
2. How many permitted outfalls are identified in the SWPPP? <u>4</u>	
3. Are any outfalls considered similar?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
4. Are samples being collected from the location(s) specified in the permit?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
5. Is the sample location(s) suitable for the collection of representative samples?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
A. If no, describe why the sample location(s) is not suitable.	
6. Please list the benchmark parameters that are required to be sampled for under the Sector/Sub-Sector? <b>pH, TSS</b>	
7. Are all benchmark parameters being sampled and analyzed at least annually (Part 3.4)?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
8. Was all collected benchmark parameter samples properly preserved and analyzed (Part 3.8.2.5)?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
9. Did sampling reveal any exceedances of benchmark parameters?	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
A. If yes, was a process to develop a Corrective Action Plan started within 30 days of the exceedance(s)(Part 3.11.1)?	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
B. If yes, was the exceedance attributed to a natural background pollutant level?	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
i. If yes, has the Department been notified?	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
10. Are at least 4 visual site inspections conducted annually (Part 5.1.1)?	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
B. If yes, do the inspections include the following:	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
i. Date of the inspection	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
ii. Personnel conducting the inspection	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
iii. Major observations	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
iv. Summary of actions taken as a result of the inspection	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
C. Did at least one inspection occur during a period when stormwater was discharging (Part 5.1)?	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
i. If yes, provide the date when the inspection occurred.	
11. Was a Comprehensive Site Compliance Evaluation conducted each year (Part 5.1.2)?	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
A. If yes, provide the date when the inspection occurred.	
12. Was a Storm Water Annual Report (SWAR) for the previous monitoring period(s) completed?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
A. If yes, is the information provided on the SWAR accurate?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
B. If yes, is the SWAR signed by the Responsible Official or Cognizant Official?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
13. Is the permittee retaining all records according to Part 5.2 of the permit?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
Comments:	
<b>Only records of one visual site inspection performed in Dec. 2021 available at time of inspection.</b>	
<b>SECTION C: FACILITY TOUR</b>	<b>" S " M " U " NA " NE</b>
1. Are the number and location of all outfalls accurate as described in the permit, SWPPP, and site map?	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
2. Are there any allowable non-stormwater discharges that are not identified in the SWPPP?	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
3. Are there any non-stormwater discharges occurring that are not allowed in the permit?	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
4. Has notification been given to the EPA or DEQ of any new, different, or increased discharges?	" Y " N " NI <input checked="" type="checkbox"/> NA " NE
5. Are all discharges from this facility permitted, both stormwater and non-stormwater?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
6. Is there evidence of spills or leaks that have not been properly remediated as required by the SWPPP?	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
7. Is there evidence of erosion occurring or are there areas where the ground is not stabilized?	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
8. Are there stormwater controls, or other structures or storage areas present that are not identified in the SWPPP or on the site map?	" Y <input checked="" type="checkbox"/> N " NI " NA " NE
9. Are the BMPs properly operated, installed, and/or maintained?	<input checked="" type="checkbox"/> Y " N " NI " NA " NE
10. Are housekeeping procedures being implemented and are those procedures adequate?	" Y <input checked="" type="checkbox"/> N " NI " NA " NE

Comments:

**OUTFALL VISUAL INSPECTION REPORT**

IS THIS A PERMITTED OUTFALL?  Y  N

OUTFALL LOCATION: 33.629374°, -91.771335°

PHOTO NUMBER: 8

OUTFALL DESCRIPTION: Outfall 001

1. Does the outfall match the location in the SWPPP and or Site Map?  Y  N

2. Does the outfall discharge from one of the following?:  Pond  Sheet flow  Ditch  Other (Explain): Culvert

3. If discharging from a pond is there a control structure in place?  Y  N  NA

4. Is the outfall considered similar to another outfall?  Y  N

A. If yes, which outfall(s) is/are considered similar? Outfalls 002, 003, 004

5. What are the potential pollution sources in the drainage area? Common litter

6. Are the BMPs associated with the outfall appropriate?  Y  N

7. Does run-on from adjacent properties drain to this outfall?  Y  N

8. Are any exceedances at this outfall attributed to natural background levels?  Y  N

Comments:

**VISUAL OBSERVATION**

1. Was a discharge occurring at the time of inspection?  Y  N  NA

2. Discharge water flow color:  Clear  Turbid  Oil Sheen  Soapy/Foamy  Other (Explain):

3. Are odors present at the outfall?  Y  N

4. Are allowable non-stormwater discharges occurring near the outfall?  Y  N

5. Is the outfall suitable for the collection of representative samples?  Y  N  NA

6. Is there evidence of pollution occurring at the outfall?  Y  N

7. Is there excessive erosion occurring at the outfall?  Y  N

Comments:

**OUTFALL VISUAL INSPECTION REPORT**

IS THIS OUTFALL PERMITTED? Y N

OUTFALL LOCATION: 33.631129°, -91.770146°

PHOTO NUMBER: 7

OUTFALL DESCRIPTION: Outfall 002

9. Does the outfall match the location in the SWPPP and or Site Map? Y N

10. Does the outfall discharge from one of the following?:  Pond  Sheet flow  Ditch  Other (Explain): Culvert

11. If discharging from a pond is there a control structure in place? Y N NA

12. Is the outfall considered similar to another outfall? Y N

B. If yes, which outfall(s) is/are considered similar? Outfalls 001, 003, 004

13. What are the potential pollution sources in the drainage area? Common litter

14. Are the BMPs associated with the outfall appropriate? Y N

15. Does run-on from adjacent properties drain to this outfall? Y N

16. Are any exceedances at this outfall attributed to natural background levels? Y N

Comments:

VISUAL OBSERVATION

8. Was a discharge occurring at the time of inspection? Y N NA

9. Discharge water flow color:  Clear  Turbid  Oil Sheen  Soapy/Foamy  Other (Explain):

10. Are odors present at the outfall? Y N

11. Are allowable non-stormwater discharges occurring near the outfall? Y N

12. Is the outfall suitable for the collection of representative samples? Y N NA

13. Is there evidence of pollution occurring at the outfall? Y N

14. Is there excessive erosion occurring at the outfall? Y N

Comments:

**Some litter present.**

**OUTFALL VISUAL INSPECTION REPORT**

IS THIS OUTFALL PERMITTED? Y N

OUTFALL LOCATION: 33.629435°, -91.766982°

PHOTO NUMBER: 9

OUTFALL DESCRIPTION: Outfall 004

17. Does the outfall match the location in the SWPPP and or Site Map? Y N

18. Does the outfall discharge from one of the following?:  Pond  Sheet flow  Ditch  Other (Explain):

19. If discharging from a pond is there a control structure in place? Y N NA

20. Is the outfall considered similar to another outfall? Y N

C. If yes, which outfall(s) is/are considered similar? Outfalls 001, 002, 003

21. What are the potential pollution sources in the drainage area? Common litter

22. Are the BMPs associated with the outfall appropriate? Y N

23. Does run-on from adjacent properties drain to this outfall? Y N

24. Are any exceedances at this outfall attributed to natural background levels? Y N

Comments:

VISUAL OBSERVATION

15. Was a discharge occurring at the time of inspection? Y N NA

16. Discharge water flow color:  Clear  Turbid  Oil Sheen  Soapy/Foamy  Other (Explain):

17. Are odors present at the outfall? Y N

18. Are allowable non-stormwater discharges occurring near the outfall? Y N

19. Is the outfall suitable for the collection of representative samples? Y N NA

20. Is there evidence of pollution occurring at the outfall? Y N

21. Is there excessive erosion occurring at the outfall? Y N

Comments:



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Drew Foam Companies Inc.</b>		
Photographer:	<b>Trey Butler</b>	Date:	<b>4/21/2022</b>
Time:	<b>11:05</b>	Witness:	<b>Ben White</b>
Photo #:	<b>1</b>	Description:	<b>Excess garbage at southeast corner of site.</b>



Photographer:	<b>Trey Butler</b>	Date:	<b>4/21/2022</b>
Time:	<b>11:06</b>	Witness:	<b>Ben White</b>
Photo #:	<b>2</b>	Description:	<b>Excess garbage at southeast corner of site.</b>



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Drew Foam Companies Inc.</b>				
Photographer:	<b>Trey Butler</b>	Date:	<b>4/21/2022</b>	Time:	<b>11:08</b>
Witness:	<b>Ben White</b>	Photo #:	<b>3</b>		
Description:	<b>Scattered foam on east-side of the property.</b>				



Photographer:	<b>Trey Butler</b>	Date:	<b>4/21/2022</b>	Time:	<b>11:08</b>
Witness:	<b>Ben White</b>	Photo #:	<b>4</b>		
Description:	<b>Scattered foam on east-side of the property.</b>				



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Drew Foam Companies Inc.</b>		
Photographer:	<b>Trey Butler</b>	Date:	<b>4/21/2022</b>
Witness:	<b>Ben White</b>	Time:	<b>11:08</b>
		Photo #:	<b>5</b>
Description:	<b>Scattered foam on east-side of the property.</b>		



Photographer:	<b>Trey Butler</b>	Date:	<b>4/21/2022</b>
Witness:	<b>Ben White</b>	Time:	<b>11:10</b>
		Photo #:	<b>6</b>
Description:	<b>Foam in drainage to Outfall 003.</b>		



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Drew Foam Companies Inc.</b>		
Photographer:	<b>Trey Butler</b>	Date:	<b>4/21/2022</b>
Witness:	<b>Ben White</b>	Time:	<b>11:12</b>
		Photo #:	<b>7</b>
Description:	<b>Outfall 002</b>		



Photographer:	<b>Trey Butler</b>	Date:	<b>4/21/2022</b>
Witness:	<b>Ben White</b>	Time:	<b>11:15</b>
		Photo #:	<b>8</b>
Description:	<b>Outfall 001</b>		



**Office of Water Quality Photographic Evidence Sheet**

Location:	<b>Drew Foam Companies Inc.</b>				
Photographer:	<b>Trey Butler</b>	Date:	<b>4/21/2022</b>	Time:	<b>11:23</b>
Witness:	<b>Ben White</b>	Photo #:	<b>9</b>		
Description:	<b>Southeast corner of unused parking lot; showing drainage to Outfall 004.</b>				



**From:** [Butler, Trey](#)  
**To:** [Marshall, Uniqika](#)  
**Cc:** [McCabe, Kerri](#)  
**Subject:** FW: Drew Foam Monticello Storm Water Follow Up  
**Date:** Tuesday, September 6, 2022 12:59:37 PM  
**Attachments:** [Response to 4-21 Inspection.docx](#)  
[Stormwater Inspection Form.docx](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image007.png](#)

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Uniqika,

Can you please add this response to PDS 120837 (ARR000817)?

Thank you,

**Trey Butler** | Inspector  
**Division of Environmental Quality | Office of Water Quality**  
**Compliance Branch**  
2215 W Hillsboro Street | El Dorado, AR 71730  
c: [501.231.0062](tel:501.231.0062) | e : [Trey.Butler@adeq.state.ar.us](mailto:Trey.Butler@adeq.state.ar.us)



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**From:** Cory Balthrop [mailto:[cbalthrop@hunt-sol.com](mailto:cbalthrop@hunt-sol.com)]  
**Sent:** Tuesday, September 6, 2022 10:50 AM  
**To:** Butler, Trey  
**Subject:** RE: Drew Foam Monticello Storm Water Follow Up

Mr. Butler,

Attached is a digital copy of our official response to your inspection findings. Please let me know if you require a physical copy sent by mail as well.

Reach out with any questions you may have.

Thanks,

**Cory Balthrop MS CSP**

**Director – Environmental, Health & Safety**  
**Foam Holdings, Inc.**  
**Desk: 615-510-2060 ext.112**  
**Cell: 563-949-9620**  
**Email: [cbalthrop@hunt-sol.com](mailto:cbalthrop@hunt-sol.com)**



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**From:** Cory Balthrop  
**Sent:** Friday, August 26, 2022 2:22 PM  
**To:** Trey.Butler@adeq.state.ar.us  
**Subject:** Drew Foam Monticello Storm Water Follow Up

Mr. Butler,

I'm writing you in reference to the attached inspection report and request for corrective action. I apologize for our late response as this was communicated to the incorrect individual so it did not reach me in a timely manner.

I am meeting with the onsite operations team on 8/30/22 to review and compile our updates to you. I target having a summarized report by the end of the week.

Again, I apologize for this delay and I assure you it was not intentional.

If you have any questions please let me know.

Thanks,

**Cory Balthrop MS CSP**  
**Director – Environmental, Health & Safety**  
**Foam Holdings, Inc.**  
**Desk: 615-510-2060 ext.112**  
**Cell: 563-949-9620**  
**Email: [cbalthrop@hunt-sol.com](mailto:cbalthrop@hunt-sol.com)**



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**AMERICA**



**Cory Balthrop**  
**Director, Environmental Health & Safety**

Foam Holdings Inc.  
6 Cadillac Drive  
Brentwood, TN 37027  
Office: 615-510-2060 ext. 112  
Mobile: 563-949-9620  
Email: [cbalthrop@hunt-sol.com](mailto:cbalthrop@hunt-sol.com)

September 6, 2022

Trey Butler  
Inspector  
Office of Water Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Subject: Follow Up to Drew Foam Companies Inc. Inspection (Drew Co)

Dear Mr. Butler

This letter addresses observations you made during your stormwater inspection on April 21, 2022 at the Drew Foam location in Monticello AR. The onsite team has been working diligently to address each of your concerns and I have outlined the corrective measures taken so far, and what is currently being implemented.

**Corrective Action #1**

Housekeeping practices not implemented on east-side of facility. This includes excess garbage and scattered foam produced in the facility. This is a violation of Part 3.1.2 of the general permit

Improvement photos on next page:



**East Side of Property**



**Outfall #1**



**Outfall #2**



**Outfall #3**



**Outfall #4**



**South East corner of site**

**Corrective Action #2**

Violation #2: Facility Site Map was not included with the SWPPP. This is a violation of Part 4.2.3 of the general permit.

Corrective Action: Facility map has been added to site SWPPP. Annual review to occur to ensure compliance is maintained.

**Corrective Action #3**

Violation #3: Documentation of Routine and Comprehensive facility inspections were not maintained. This is a violation of Part 4.2.6.3 of the general permit.

Corrective Action: Quarterly inspection requirements have been communicated to onsite teams and will be properly documented moving forward.

**Corrective Actions Summary:**

As mentioned above, all requested corrective actions have been completed or are in the process of implementation. Additionally, the unit has addressed the suggestions for improvement as part of their overall response. I have also attached as an appendices their Weekly Stormwater Inspection form. This is used by the facility to ensure all the corrective actions taken are maintained and sustainable moving forward.

Please feel free to contact me with any questions or concerns you may have.

Thanks,

Cory Balthrop  
Director, Environmental Health & Safety

**WEEKLY STORMWATER INSPECTION FORM**

**DATE:** \_\_\_\_\_

Loading docks      Notes: \_\_\_\_\_

Perimeter      Notes: \_\_\_\_\_

Fence line      Notes: \_\_\_\_\_

Storm drains      Notes: \_\_\_\_\_

Waste bins      Notes: \_\_\_\_\_

Inspector: \_\_\_\_\_



# ARKANSAS

## ENERGY & ENVIRONMENT

September 19, 2022

Joanna O'Neal, Controller  
Drew Foam Companies, Inc.  
1093 Hwy 278 East  
Monticello, AR, 71655  
Via email to: [joneal@drewfoam.com](mailto:joneal@drewfoam.com)

**RE: Drew Foam Co - Response to Inspection (Drew Co)**  
**AFIN: 22-00057** **NPDES Permit No.: ARR000817**

Dear Ms. O'Neal:

I have reviewed the response pertaining to my April 12, 2022 inspection of Drew Foam Companies, Inc. facility. The information provided sufficiently addresses the items referenced in my inspection report. At this time, the Division has no further comment concerning this particular inspection. Acceptance of this response by the Division does not preclude any future enforcement action deemed necessary at this site or any other site.

If I require further information concerning this matter, I will contact you. Thank you for your attention to this matter. Should you have any questions, please contact me at (501) 231-0062 or you may email me at [Trey.Butler@adeq.state.ar.us](mailto:Trey.Butler@adeq.state.ar.us).

Sincerely,

A handwritten signature in black ink, appearing to read 'Trey Butler', with a long horizontal stroke extending to the right.

Trey Butler  
Inspector, Office of Water Quality  
5301 Northshore Drive, North Little Rock, AR, 72118