

## Koon, Nancy

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**To:** Carstens, Loretta  
**Subject:** RE: NPDES Permit No. AR0047384, Anthony Timberlands - Urbana

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**From:** ken ruckstuhl [<mailto:kruckstuhl@env-mgt.com>]  
**Sent:** Tuesday, December 21, 2021 2:25 PM  
**To:** Carstens, Loretta  
**Cc:** laurie marcella; Robert Hanry; Phil Witter ([Phil.Witter@canfor.com](mailto:Phil.Witter@canfor.com))  
**Subject:** RE: NPDES Permit No. AR0047384, Anthony Timberlands - Urbana  
**Importance:** High

Loretta,  
Attached are the following documents to be added to or replace pages in the referenced NPDES permit renewal application:

1. Current signed Corporate Disclosure Statement;
2. Revised Topographic Map showing a 1 mile radius; and
3. Revised page for Form 2C indicating a winter pond temperature reading taken on December 21, 2021 and supporting field documentation. The application had listed the temperature of the outfall pond as "ambient". However, a summer pond temperature reading can be collected in June 2022 and reported to ADEE via a contact and email address that you specify.

Please let me know if you have any further questions or need any additional information. I can be reached at (601) 832-6509 or by email.  
Regards,  
Ken

Kenneth D. Ruckstuhl, RPG  
***Environmental Management Services, Inc.***  
104 Avalon Court, Suite F  
Brandon, MS 39047

Phone (601) 992-8233  
Fax (601) 919-2674  
Cell (601) 832-6509

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**From:** Carstens, Loretta <[loretta.carstens@adeq.state.ar.us](mailto:loretta.carstens@adeq.state.ar.us)>  
**Sent:** Monday, December 20, 2021 3:26 PM  
**To:** ken ruckstuhl <[kruckstuhl@env-mgt.com](mailto:kruckstuhl@env-mgt.com)>; 'phil.witter@canfor.com' <[phil.witter@canfor.com](mailto:phil.witter@canfor.com)>  
**Cc:** laurie marcella <[lmarcella@env-mgt.com](mailto:lmarcella@env-mgt.com)>; Robert Hanry <[rhanry@env-mgt.com](mailto:rhanry@env-mgt.com)>  
**Subject:** RE: NPDES Permit No. AR0047384, Anthony Timberlands - Urbana

Thanks.

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**From:** ken ruckstuhl [<mailto:kruckstuhl@env-mgt.com>]  
**Sent:** Monday, December 20, 2021 3:25 PM  
**To:** Carstens, Loretta; 'phil.witter@canfor.com'

**Cc:** laurie marcella; Robert Hanry

**Subject:** RE: NPDES Permit No. AR0047384, Anthony Timberlands - Urbana

Loretta,

We have received your completeness review comments and we will compile the revisions/additional data.

Regards,

Ken

Kenneth D. Ruckstuhl, RPG

***Environmental Management Services, Inc.***

104 Avalon Court, Suite F

Brandon, MS 39047

Phone (601) 992-8233

Fax (601) 919-2674

Cell (601) 832-6509

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**From:** Carstens, Loretta <[loretta.carstens@adeq.state.ar.us](mailto:loretta.carstens@adeq.state.ar.us)>

**Sent:** Monday, December 20, 2021 3:21 PM

**To:** ken ruckstuhl <[kruckstuhl@env-mgt.com](mailto:kruckstuhl@env-mgt.com)>; 'phil.witter@canfor.com' <[phil.witter@canfor.com](mailto:phil.witter@canfor.com)>

**Subject:** NPDES Permit No. AR0047384, Anthony Timberlands - Urbana

Please see the attached administrative incompleteness letter. Also, please note that although the due date of January 1, 2022, is a holiday and falls on the weekend, the due date does not roll over to the next business day.

A hard copy will follow in the mail.

Loretta Carstens, P.E. | Engineer, P.E.

**Division of Environmental Quality | Office of Water Quality**

**NPDES Permits Section**

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0612 | e: [loretta.carstens@adeq.state.ar.us](mailto:loretta.carstens@adeq.state.ar.us)



**ARKANSAS**  
**ENERGY & ENVIRONMENT**

# INSTRUCTIONS FOR DISCLOSURE STATEMENT

Arkansas Code Annotated Section 8-1-106 requires that all applicants for the issuance, or transfer of any permit, license, certification or operational authority issued by the Arkansas Department of Environmental Quality (ADEQ) file a disclosure statement with their applications. The filing of a disclosure statement is mandatory. No application can be considered complete without one.

Disclosure statement means a written statement by the applicant that contains:

- The full name and business address of the applicant and all affiliated persons;
- The full name and business address of any legal entity in which the applicant holds a debt or equity interest of at least five percent (5%) or that is a parent company or subsidiary of the applicant, and a description of the ongoing organizational relationships as they may impact operations within the state;
- A description of the experience and credentials of the applicant, including any past or present permits, licenses, certifications, or operational authorizations relating to environmental regulation;
- A listing and explanation of any civil or criminal legal actions by government agencies involving environmental protection laws or regulations against the applicant and affiliated persons in the ten (10) years immediately preceding the filing of the application, including administrative enforcement actions resulting in the imposition of sanctions, permit or license revocations or denials issued by any state or federal authority, actions that have resulted in a finding or a settlement of a violation, and actions that are pending;
- A listing of any federal environmental agency and any other environmental agency outside this state that has or has had regulatory responsibility over the applicant; and
- Any other information the Director of the Arkansas Department of Environmental Quality may require that relates to the competency, reliability, or responsibility of the applicant and affiliated persons.

## Exemptions:

The following persons or entities are not required to file a disclosure statement:

- Governmental entities, consisting only of subdivisions or agencies of the federal government, agencies of the state government, counties, municipalities, or duly authorized regional solid waste authorities as defined by § 8-6-702. (This exemption shall not extend to improvement districts or any other subdivision of government which is not specifically instituted by an act of the General Assembly.)
- Applicants for a general permit to be issued by the department pursuant to its authority to implement the National Pollutant Discharge Elimination System for storm water discharge.
- If the applicant is a publicly held company required to file periodic reports under the Securities and Exchange Act of 1934 or a wholly owned subsidiary of a publicly held company, the applicant shall not be required to submit a disclosure statement, but shall submit the most recent annual and quarterly reports required by the Securities and Exchange Commission which provide information regarding legal proceedings in which the applicant has been involved. The applicant shall submit such other information as the director may require that relates to the competency, reliability, or responsibility of the applicant and affiliated persons.

## **Exemptions continued:**

The following permits, licenses, certifications, and operational authorizations are also exempt from submitting a disclosure statement:

- **Hazardous Waste Treatment, Storage, and Disposal Permit Modifications (Class 1, 2, and 3), as defined in Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation 23;**
- **Phase 1 Consultants, as defined in APC&EC Regulation 32;**
- **Certifications for Operators of Commercial Hazardous Waste Facilities, as defined in APC&EC Regulation 23 § 264.16(f);**
- **Regulated Storage Tank Contractor or Individual License Renewals as defined in APC&EC Regulation 12;**
- **Certifications for Persons Operating and Maintaining Underground Storage Tank Systems which Contain Regulated Substances, as defined in APC&EC Regulation 12.701, et. seq.;**
- **Individual Homeowners seeking coverage under General Permit ARG5500000; Wastewater Operator Licenses, as defined in APC&EC Regulation 3;**
- **Water Permit Modifications for permits issued under the authority of the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. §8-4-101, et. seq.);**
- **Solid Waste Permit Modifications for permits issued under APC&EC Regulation 22; Solid Waste Landfill Operator License Renewals, as defined in Regulation No. 27;**
- **Air Permit Modifications for permits issued under APC&EC Regulations 18, 19, and 26; and Asbestos Certification Renewals, as defined in Regulation 21.**

**Deliberate falsification or omission of relevant information from disclosure statements shall be grounds for civil or criminal enforcement action or administrative denial of a permit, license, certification, or operational authorization.**

# ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY DISCLOSURE STATEMENT

## Instructions for the Completion of this Document:

- A. Individuals, firms or other legal entities with no changes to an ADEQ Disclosure Statement, complete items 1 through 5 and 18.**
- B. Individuals who never submitted an ADEQ Disclosure Statement, complete items 1 through 4, 6, 7, and 16 through 18.**
- C. Firms or other legal entities who never submitted an ADEQ Disclosure Statement, complete 1 through 4, and 6 through 18.**

If Not Submitting by ePortal, Mail Original to:

**ADEQ  
DISCLOSURE STATEMENT  
[List Proper Division(s)]  
5301 Northshore Drive  
North Little Rock, AR 72118-5317**

1. APPLICANT: (Full Name)

2. MAILING ADDRESS: (Number and Street, P.O.Box Or Rural Route)

3. CITY, STATE, AND ZIPCODE:

4a. Applicant Type:

Individual      Corporate or Other Entity

4b. Reason for Submission:

Permit      License      Certification      Operational Authority

New Application      Modification      Renewal Application (If no changes from previous disclosure statement, complete number 5 and 18.)

4c. Programs:

Air      Water      Hazardous Waste      Regulated Storage Tank      Mining      Solid Waste      Used Tire Program

5. Declaration of No Changes:

The violation history, experience and credentials, involvement in current or pending environmental lawsuits, civil and criminal, have not changed since the last Disclosure Statement that was filed with ADEQ on \_\_\_\_\_

**6. Describe the experience and credentials of the Applicant, including the receipt of any past or present permits, licenses, certifications or operational authorization relating to environmental regulation. (Attach additional pages, if necessary.)**

**7. List and explain all civil or criminal legal actions by government agencies involving environmental protection laws or regulations against the Applicant \* in the last ten (10) years including:**

- 1. Administrative enforcement actions resulting in the imposition of sanctions;**
- 2. Permit or license revocations or denials issued by any state or federal authority;**
- 3. Actions that have resulted in a finding or a settlement of a violation; and**
- 4. Pending actions.**

**(Attach additional pages, if necessary.)**

**\* Firms or other legal entities shall also include this information for all persons and legal entities identified in sections 8-16 of this Disclosure Statement.**

**8. List all officers of the Applicant. (add additional pages, if necessary.)**

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

**9. List all directors of the Applicant. (Add additional pages, if necessary.)**

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

**10. List all partners of the Applicant. (Add additional pages, if necessary.)**

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

**11. List all persons employed by the Applicant in a supervisory capacity or with authority over operations of the facility subject to this application.**

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

**12. List all persons or legal entities, who own or control more than five percent (5%) of the Applicant's debt or equity.**

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

**13. List all legal entities, in which the Applicant holds a debt or equity interest of more than five percent (5%).**

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

**14. List any parent company of the Applicant. Describe the parent company's ongoing organizational relationship with the Applicant.**

NAME: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

**Organizational Relationship:**

**15. List any subsidiary of the Applicant. Describe the subsidiary's ongoing organizational relationship with the Applicant.**

NAME: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

**Organizational Relationship:**



**16. List any person who is not now in compliance or has a history of noncompliance with the environmental law or regulations of this state or any other jurisdiction and who through relationship by blood or marriage or through any other relationship could be reasonably expected to significantly influence the Applicant in a manner which could adversely affect the environment.**

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

NAME: \_\_\_\_\_ TITLE: \_\_\_\_\_

STREET: \_\_\_\_\_

CITY, STATE, ZIP: \_\_\_\_\_

**17. List all federal environmental agencies and any other environmental agencies outside this state that have or have had regulatory responsibility over the Applicant.**


**18. VERIFICATION AND ACKNOWLEDGEMENT**

The Applicant agrees to provide any other information the director of the Arkansas Department of Environmental Quality may require at any time to comply with the provisions of the Disclosure Law and any regulations promulgated thereto. The Applicant further agrees to provide the Arkansas Department of Environmental Quality with any changes, modifications, deletions, additions or amendments to any part of this Disclosure Statement as they occur by filing an amended Disclosure Statement.

**DELIBERATE FALSIFICATION OR OMISSION OF RELEVANT INFORMATION FROM DISCLOSURE STATEMENTS SHALL BE GROUNDS FOR CIVIL OR CRIMINAL ENFORCEMENT ACTION OR ADMINISTRATIVE DENIAL OF A PERMIT, LICENSE, CERTIFICATION OR OPERATIONAL AUTHORIZATION.**

**COMPLETE THIS SECTION ONLY IF SUBMITTING OTHER THAN BY EPORTAL:**

I, Phil Witter, certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violation.

APPLICANT SIGNATURE: 

TITLE: Corporate Environmental Manager

DATE: 12.3.21

EPA Identification Number AR0047384	NPDES Permit Number AR0047384	Facility Name Anthony Forest Products-Urbana	Outfall Number 001
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**TABLE A. CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.21(g)(7)(iii))<sup>1</sup>**

	Pollutant	Waiver Requested (if applicable)	Units (specify)		Effluent				Intake (Optional)	
					Maximum Daily Discharge (required)	Maximum Monthly Discharge (if available)	Long-Term Average Daily Discharge (if available)	Number of Analyses	Long-Term Average Value	Number of Analyses
<input type="checkbox"/> Check here if you have applied to your NPDES permitting authority for a waiver for <i>all</i> of the pollutants listed on this table for the noted outfall.										
1.	Biochemical oxygen demand (BOD <sub>5</sub> )	<input type="checkbox"/>	Concentration	mg/L	24	14	5.65	37		
			Mass	lbs	199.1	5.86	0.95	37		
2.	Chemical oxygen demand (COD)	<input type="checkbox"/>	Concentration	mg/L	190			1		
			Mass	lbs	1576			1		
3.	Total organic carbon (TOC)	<input type="checkbox"/>	Concentration	mg/L	58			1		
			Mass	lbs	481.1			1		
4.	Total suspended solids (TSS)	<input type="checkbox"/>	Concentration	mg/L	66	50	16.7	37		
			Mass	lbs	547.5	20.9	2.8	37		
5.	Ammonia (as N)	<input type="checkbox"/>	Concentration	mg/L	0.58			1		
			Mass	lbs	4.81			1		
6.	Flow	<input type="checkbox"/>	Rate	MGD	0.995	0.0502	0.0201	516		
7.	Temperature (winter)	<input type="checkbox"/>	°C	°C	53.1			1		
	Temperature (summer)	<input type="checkbox"/>	°C	°C	(1)			0		
8.	pH (minimum)	<input type="checkbox"/>	Standard units	s.u.	6.13	6.44	Average =	37		
	pH (maximum)	<input type="checkbox"/>	Standard units	s.u.	7.90	7.36	6.97	37		

<sup>1</sup> Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

(1) Data will be submitted after collection.

Field Data Form

FIELD MEASUREMENT RECORD (Date 12-21-21)

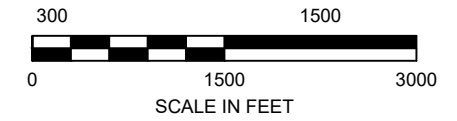
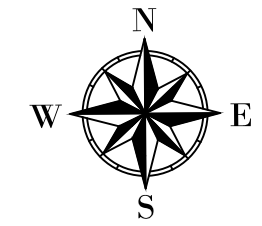
REVIEWED BY: Bob Clawey

NPDDES




Sample Location	Date	Time	Field Crew	Water Staff Gauge Height (ft)	DO (mg/l)	pH (su)	Debris (yes/no)	# of Sample Containers Water	Notes
Outfall 001	12-21-21	8:00	Rob						TEMP 53.1 F

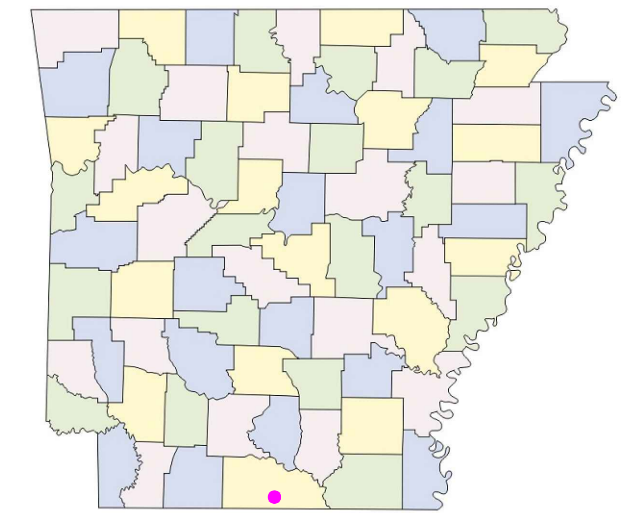
\* Indicates calibration check was made

WINTER TEMP FOR NPDDES 001-



**LEGEND**

-  NPDES OUTFALL LOCATION
-  STORMWATER OUTFALL LOCATION
-  SANITARY OUTFALL LOCATION



<b>TOPOGRAPHIC MAP</b>		
ANTHONY FOREST PRODUCTS, LLC CANFOR SOUTHERN PINE - URBANA PLANT EL DORADO, ARKANSAS		
DATE: 12/20/2021	APPROVED: K. Ruckstuhl	DRAWN BY: LMM
SCALE: AS SHOWN	DATE: 12/20/2021	JOB NO. CANO-21-001
<b>ENVIRONMENTAL</b> MANAGEMENT SERVICES, INC.		FIGURE <b>1</b>