

June 17, 2009

Mr. Bob Renfro, General Manager Fliteline Engine Supply 1412 Phoenix Fort Smith, AR 72901

RE: Complaint Investigation at the Fliteline Engine Supply facility.

Dear Mr. Renfro:

On June 16, 2009, I performed an investigation at the Fliteline Engine Supply facility in response to a complaint. The complaint alleged that there were locations at the site where oil waste was allowed to flow off site. The investigation revealed that you are in violation of the Arkansas Water and Air Pollution Control Act, the Federal Clean Water Act and the regulations promulgated thereunder. Specifically I noted the following violation:

There was evidence of heavy black staining on the concrete pad located on the north side of the cylinder head department building. It was apparent that this staining was a result of used oil which has been leaking from the compressor and draining across the concrete pad to a grassy area. By definition, this is considered to be placing waste in a location where it is likely to cause pollution to the waters of the State. This is a violation of Section 8-4-217(a) (2) of the Arkansas Water and Air Pollution Control Act 472.

The above items require your immediate attention. Please submit a written response to this finding to Cindy Garner, Water Division Enforcement Branch Manager. The response should be mailed to the address below. This response should contain documentation describing the course of action taken to correct the item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e. picture) is due by July 2, 2009.

During the inspection, we had a discussion in regard to an Industrial Storm Water Permit. Your facility may need to seek coverage under this general permit. You should contact Jennifer Harmon, ADEQ Storm Water Engineer, at 501-682-0627 to inquire about this permit.

Renfro, Fliteline Engine Supply June 17, 2009 Page 2

If I can be of any assistance, please contact me at 479-452-4822 ext. 11

Sincerely,

Jeff Tyler

District 4 Field Inspector

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

Water Division Photographic Evidence Sheet									
<b>Location:</b> Fliteline Engine Supply located on Phoenix Avenue in Fort Smith									
Photograph	er: J	: Jeff Tyler			Witness:	None			
Photo #	1	Of	4		Date:	06-16-09	Time:	1438	
<b>Description:</b> The compressor which is located on the back side of the cylinder head department									



**Photographer:** Jeff Tyler Witness: None Photo # Of Date: 06-16-09 Time: 1438

**Description:** Evidence of used oil which has leaked from the compressor and flowed across the pad.



Water Division Photographic Evidence Sheet										
<b>Location:</b> Fliteline Engine Supply located on Phoenix Avenue in Fort Smith.										
Photographer:		Jeff Tyler			Witness:	None	None			
Photo #	3	Of	4		Date:	06-16-09	Time:	1421		
Description	Hundreds of used engines stored directly on the ground with no protection from rainfall.									



**Photographer:** Jeff Tyler Witness: None Of Date: 1421 Photo # 06-16-09 Time:

**Description:** Used engines stored on ground, many with the oil filter still attached.



WAT	ER DIVISION C	OMPLAINT REPO	RT					
GPS LOCATION:		AFIN: <b>66-00446</b>						
N 35°20'20" W 94° 25'14"		PERMIT#: NA						
DATE RECEIVED: June 2, 2009		COUNTY: Sebastian						
COMPLAINANT NAME: Anonymous		COMPLAINT AGAINST: Fliteline Engine Supply						
ADDRESS: NA		ADDRESS: 1412	2 Phoer	nix-Fort Smith				
PHONE: NA		PHONE: <b>1-800-726-1427</b>						
TRACKING & REFERRAL INFORMATION								
PERSON RECEIVING REPORT:	SUPERVISOR REFERRAL: DATE:							
Hazardous Waste Division	04-30-09				04-30-09			
INSPECTOR REFERRAL:	DATE:				DATE:			
Martin Boyd	04-30-09	Eric Fleming RECEIVING INSPECTOR:		06-02-09				
PHONE REFERRAL CONTACT:	DATE:	Jeff Tyler	K:	DATE: <b>06-02-09</b>				
COMPLAINT RECEIVED BY: ☑PHONE 【	L Dletter Dve		IET DE	=	00-02-09			
DETAILED DESCRIPTION								
Complaint was sent to ADEQ from region 6 EPA. Oil waste on floor of shop and outside of building, waste oil and antifreeze not contained, parts washer leaking, and rinsing parts off and allowing the water to drain outside the building.								
LOCATION								
1412 Phoenix								
PREVIOUS COMPLAINT: TYES TO DATES:								
DISCHARGE TO STREAM: ☐YES ☑NO	NAME OF ST	REAM:						
	INVEST	GATION						
INSPECTOR:		DATE:						
Jeff Tyler		June 16, 2009						
ACTION TAKEN: On-site Investigation		PHOTOS TAKEN: ☑YES ☐NO						
Upon arrival at the site, I met with Bob Renfro, General Manager of Fliteline Engine Supply. I explained that I was conducting a follow up investigation in regard to the April 30, 2009, complaint. During the inspection of the site, I observed the back side of the property; this is the area where engines are staged. It appeared that all engines were stored directly on the ground without any protection from rainfall events. Many of the used engines stored on the lot still had the oil filter attached. A storm water drain is located within the lot where all of the used engines are staged. On the inside of the plant, I observed the parts washer and a dipping vat. There was evidence that the equipment had leaked during operation. According to Mr. Renfro, all waste water produced by this equipment was sent to the public sewer.  We also toured the cylinder head department. There was a location on the back side of the building where the concrete pad was heavily stained with evidence of used oil. It was apparent that the used oil was leaking from the compressor and draining to a grassy area. Mr. Renfro was advised that the used oil must be contained and the impacted area should be cleaned.  I also advised Mr. Renfro that he should contact the Department's Storm Water engineers to discuss whether he must apply for an Industrial Storm Water Permit.								
FURTHER ACTION:								
Letter will be sent to Fliteline and the Enforcement Branch. City of Fort Smith Pre-treatment Coordinator will also be contacted in regard to the facility and the complaint.								
On The	<u></u>							

Permit #: NA

ADEQ Water Div. Complaint Investigation | AFIN: NA

SIGNATURE: Jeff Tyler

DATE: **June 17, 2009** 



## 1412 Phoenix Ave Fort Smith, Arkansas 72901

June 30, 2009

Cindy Garner
Arkansas Department of Environmental Quality
Water Division Enforcement Branch Manager
5301 Northside Dr.
North Little Rock, Arkansas 72118-5317

RE: Complaint Investigation at the Fliteline Engine Supply facility

Dear Ms. Garner,

In response to Jeff Tyler's letter date June 17, 2009 I have attached a picture showing the changes made to our air compressors to eliminate a potential water hazard. As shown in the picture we have attached drain hoses to each compressor and routed them to a collection drum to enable capturing of excess condensation buildup. Once we've collected enough drainage we will have FCC Environmental pick it up for proper disposal as we have in the past. See attached invoice from previous disposal.

We hope this resolves this issue and if you should have any further recommendations, suggestions or changes please let me know.

Sincerely,

Bob Renfro

General Manager

Fliteline Engine Supply



environmental

14950 Heathrow Forest Pkwy, Suite 111, Houston, TX 77032

PHONE NUMBER

CUSTOMER CONTACT 382

EHICLE NO.

HILTHS LMD.

ATTH RICK

46136001

## SERVICE ORDER

NUMBER

2939519

TYPE

PROBLEM

ORDER

PAGE

suse Qualification Statement
signing this document, I hereby certify that I understand the used Hydrocarbon Recovery Services, Inc. degreasing fluid
Mineral spirits, petroleum naphtha) returned to Hydrocarbon Recovery Services, Inc. for inclusion in the Hydrocarbon
covery Services, Inc. Reuse Program will be utilized as an effective substitute for chemical product. For the purpose of alfying to participate in the Program, I further certify that any used degreasing fluid so returned to Hydrocarbon Recovery vices, inc. has not been mixed with hazardous waste or other objectionable substances. he solvent as a degreaser or cleaner. I have reviewed our physical facilities, administrative practices, and operational cedures and based on this review do willing make this true, accurate and complete certification. gree to pay for the above services and/or products and to be bound by ton the reverse side of this document. constituents that may be present in the degreasing fluid are contaminants resulting from, and incidental to, normal use SITE NUMBER NAME AND ADDRESS THELINE ENGINE SUPPLY 1412 PHOENIX AVE Parts Cleaner is clean (front/back)
Fusible link operational Used solvent has no unusual odor Used solvent passed visual inspection PRINT CUSTOMER NAME 008778 PART / DESCRIPTION TRAILER NO. 000 g UPTIME UNIT NO. Light assembly is in good working order
Lid is unobstructed
Parts Cleaner is properly grounded 6R 72901-0000 the terms CUSTOMER SIGNATURE / DATE U/M 9 and conditions set forth above Rep Initials QUANTITY HM Non DOT Regulated Used Dil CALL WAS TAKEN ON MAL GILLIGHEDS PROBLEM SYNOPSIS, AS REPORTED M ST 02-20 EMERGENCY CONTACT CHEMTREC (800) 424-9300 Shipping Declaration:

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. and all costs including, but not limited to, proper disposal, testing, and transportation if the material contains PCB's or is determined to be a hazardous waste, certify that to the best of my knowledge, the information presented herein is correct and accurate, and I am authorized to sign on behalf of the GENERATOF. The GENERATOR hereby certifies; that the material collected from the GENERATOR'S facility by Hydrocarbon Recovery Services, Inc. does not contain any PCB's as defined in 40 CFR 761 and is not hazardous waste or been mixed with a listed or characteristic hazardous waste as defined in 40 CFR 261 if the material collected is a used oil as defined in 40 CFR part 279, the GENERATOR certifies that the total halogen content is less than 1,000 ppm, or th GENERATOR hereby certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for the GENERATOR hereby certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. The GENERATOR will be responsible for the GENERATOR hereby certifies that the rebuttable waste presumption under 40 CFR Part 279 has been rebutted. Houston, TX 77032 Hydrocarbon Recovery Services, Inc. Transporter Information: 14950 Heathrow Forest Pkwy, Suite 111 US DOT ID#: 1688621 DRIVER SIGNATURE T DATE SHIPPING DESCRIPTION Initial if Conditionally Exempt Small Quantity Generator as defined in 40 CFR 261.5 Initial if Do-it-yourself collection center ARRIVE DATE った 0938 EPA ID#: TXR000078094 ВҮ ARRIVE TIME HILL ROUTE 140%のアプラム CLOSE DATE M/A NUMBER OLD STOPHNISE DATE, TIME GLYCOL SERIAL # RECEIVED AT PLANT / DATE ASSIGNED TECH NEEDED 멀 (479) 410-9200 EPA ID#: ARR000010892 2704 South 4th Street Van Buren, AR 72956 EPA ID# Generator CLOSE TIME BRIX 02-25-09 # CONT P.O. NUMBER SNJEFER PRIORITY JOB COMPLETE \*FS TYPE C-D-T

use Solvent QA & QC

thorization Signature

CUSTOMER

LF 070



June 17, 2009

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Sincerely,

Jeff Tyler

District 4 Field Inspector

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch



1412 Phoenix Ave. Fort Smith, Ar 72901

## RETURN RECEIPT REQUESTED



7002 0510 0004 3030 1820

1757 HEIST WAL



JUN 30. 109 AMOUNT 9 55.71 00077462-02

U.S. POSTAGE\_

Arkansas Department of Environmental Quality Attn: Cindy Garner Water Division Enforcement Branch Manager 5301 Northside Dr. North Little Rock, Arkansas 72118-5317



August 6, 2009

Mr. Bob Renfro, General Manager Fliteline Engine Supply 1412 Phoenix Fort Smith, AR 72901

RE: Complaint Investigation Response, AFIN: 66-00446

Dear Mr. Renfro:

The Department has received your response to the June 16, 2009 inspection of your facility by our District Field Inspector, Jeff Tyler. Your letter appears to adequately address the discrepancies identified during the visit. The Department assumes the corrective actions taken will be maintained to ensure consistent compliance with the requirements of the permit. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

The Department will keep the inspection and response on file. If future violations occur that require enforcement action, the Department will consider the inspection and response as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires the Department to consider the past history of your company and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any future violations.

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 501-682-0667 or you may e-mail me at <a href="mailto:blaket@adeq.state.ar.us">blaket@adeq.state.ar.us</a>.

Sincerely,

Tracey Blake

**Enforcement Analyst** 

Quey He

Water Division Enforcement Branch