

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/8/2023	
Media Program:	Water	
Regulatory Program(s)	NPDES	
Company Name:	Anthony Timberlands, Inc.	
Facility Name:	Malvern	
Facility Physical Location:	703 Cabe Street	
(city, state, zip code)	Malvern, Arkansas 72104	
Mailing address:	Post Office Box 743	
(city, state, zip code)	Malvern, Arkansas 72104	
County/Parish:	Hot Spring	
Facility Phone Number	501-337-7551	501-626-0663 (mobile telephone)
Facility Contact:	Jim Jones	Vice President-Pine Division
	jjones_ati@yahoo.com	
FRS Number:	110001710122	
Identification/Permit Number:	ARR00B476	
Media Identifier Number:	N/A	
NAICS:	113310	
SIC:	2411	
Personnel participating in inspection:		
Jim Jones	Anthony Timberlands, Inc.	Vice President-Pine Division
Chelsey Sherwood	USEPA-ECDWR.	Life Scientist
David Esparza, PE	USEPA-ECDWM	Environmental Engineer
EPA Lead Inspector Signature/Date	DAVID ESPARZA Digitally signed by DAVID ESPARZA Date: 2023.05.11 15:44:06 -06'00'	
	David Esparza	Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2023.05.11 21:38:18 -05'00'	
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

United States Environmental Protection Agency (EPA) Region 6 inspectors David Esparza, PE, and Ms. Chelsey Sherwood, arrived at Anthony Timberlands-Malvern facility (Malvern) at approximately 9:00 AM on March 8, 2023, for an unannounced inspection. I presented my credentials to Mr. Jim Jones, Vice President-Pine Division, of Anthony Timberlands, Inc. I informed him that this was an EPA inspection to determine the facility's compliance under the Clean Water Act (CWA) and the requirements of the National Pollutant Discharge Elimination System (NPDES) permit program, in accordance with the CWA. The generation of this report is based on information supplied by Malvern representatives, observations made by the EPA inspectors, and records and reports maintained by the permittee (Malvern), and the EPA. Before leaving the facility on March 8, 2023, an exit briefing was held with Mr. Jones and Mr. Wilson Anthony, Director of Regulatory Compliance (via telephone conference), to explain areas of concern noted at the time of the inspection.

FACILITY DESCRIPTION

Anthony Timberlands, Inc. (ATI) acquired the Hot Spring County Lumber Company and its landholdings in Malvern (Hot Spring County) in 1974. Approximately 2-years later, ATI acquired the Hollicer-Jones Lumber Company in Benton (Saline County) along with its land holdings and consolidated its mill into the Malvern site circa 1980. With production expanded this pure pine operation has a capacity of approximately 120 million board feet per year. The approximate 63-acre mill site is in the near proximity to 930 Cabe Avenue adjacent to the Union Pacific railroad and East of United States Interstate-30 (I-30) in Malvern, Hot Spring County, Arkansas (denoted in **Aerial Image 1** below). Coordinates to the mill located along the edge of the Ouachita Mountains/Ouachita National Forest are in the vicinity of: Latitude 34°21'52.31" North, Longitude 92°49'16.60" West. The mill operates the sawmill and planing mill Monday through Friday 6:00 AM to 3:00 PM on a two (2) shift schedule, though certain mill processes (kiln drying, boiler operation) are performed around the clock.



Aerial Image #1- Overall view of the Anthony Timberlands-Malvern facility. Aerial from Google Earth (September 2021).

Section II – OBSERVATIONS

The following points of discussion are derived from review of the information provided by Anthony Timberlands representatives, their consultant, or on-site visual observation. The entire electronic version of the Stormwater Pollution Prevention Plan (SWPPP) was reviewed, inclusive of inspection reports, waste manifests and site plans/maps.

- A Notice of Intent (NOI) (ARR00B476) was issued by the Arkansas Energy and Environment, Division of Environmental Quality, Office of Water Quality with an effective date of July 1, 2019, and the subsequent expiration date of June 30, 2024.
- An electronic copy of the Stormwater Pollution Prevention Plan (SWPPP), originally adopted in October 1993 and revised in December 2022 and again in March 2023 was reviewed. **Note:** the SWPPP cover photograph taken on-site March 8, 2023, differs from the electronic version cover submitted pursuant to the Request for Information (RFI) (**Appendix 1 Photograph #1 and Appendix 4**).
- The SWPP indicates inspections related to Outfall 001 were performed in March 2017 through August 2022.
- An ADEQ letter dated January 12, 2023, authorized discharges from two (2) additional outfalls: Outfall 002 and Outfall 003.
- The SWPPP states, security is third party contracted, though overall security is poor, due in part to its location and the presence of a former city street which traverses the site.

- A city (Malvern) stormwater conduit, upgradient and Southeast discharges into the facility along Cabe Avenue and contributes large volumes of water to the ditches that lead to Outfall 002 and Outfall 003.
- A bulk fuel facility (Ligon Oil) comprised of approximately 4-10K aboveground storage tanks (ASTs) upgradient and adjacent to the Malvern stormwater conduit did not have spill containment in-place.
- Visible sheen at land surface was observed at various locations within the facility indicative of "abandoned" equipment hydraulic lines, bulk oil drums, etc. have not been adequately drained/purged (**Appendix 1 Photograph #2, Photograph #3, Photograph #4, Photograph #5, Photograph #6 and Photograph #7**).
- A review of the information provided by ATI in their written response to a March 14, 2023, Request for Information (RFI), indicates the facility maintains on-site 1-100-gallon, 2-350-gallon, 2-550-gallon, 2-1K-gallon, and 1-12.5K-gallon bulk petroleum storage tanks. **Note:** observation indicated the facility had recently completed some concrete containment berms around the various ASTs though, those with containment needed pumping and/or cleaning. Additionally, it was not clear if the capacity of the containments accounted for precipitation (**Appendix 1 Photograph #8, Photograph #9, Photograph #10, Photograph #11, Photograph #12, Photograph #13, and Photograph #14**).
- Housekeeping, inclusive of staged debris (equipment, motor vehicles, replaced parts, tires, drums, wooden pallets, etc.) throughout the facility invite vermin attraction (**Appendix 1 Photograph #15, Photograph #16, Photograph #17 and Photograph #18**).
- The stormwater wattles installed/placed throughout various locations of the facility were irregularly spaced, small in diameter and not staked in typical industry methodology (**Appendix 1 Photograph #12, Photograph #19 and Photograph #20**).
- A review of the 2021/2022 Stormwater Annual Report (SWAR) analytical results indicates, an excursion of the benchmark value for Chemical Oxygen Demand (COD) occurred. (**Appendix 5**)
- Debris consistent with wastewater sanitary sewer overflow (SSO) events was visible at several locations (**Appendix 1 Photograph #21 and Photograph #22**).
- Review of the Waste Manifest documents provided by ATI in their written response to a March 14, 2023, Request for Information (RFI), indicates the non-aqueous constituents of "soil, wood chips and debris with hydraulic oil" and aqueous constituents of "creek water with hydraulic oil", though the analytical amounts are not defined (**Appendix 6**).
- A review of the facility Remediation and Maintenance Plan prepared by ECCI on behalf of ATI identified the primary Constituents of Concern (COC) as oil and grease (O&G). Additional COCs include Resource Conservation Recovery Act (RCRA) 8 Metals, Chemical Oxygen Demand (COD), and dissolved oxygen (DO). The proposed Remediation and Maintenance Plan was approved by ADEQ on January 17, 2023 (**Appendix 7**).

Section III – SUMMARY/AREAS OF CONCERN (AOC)

The entire evaluation can be summarized as follows:

- The SWPP states, security is third party contracted, though overall security is poor, due in part to its location and the presence of a former city street which traverses the site. This deficiency allows unauthorized ingress and egress and potentially exacerbates vandalism and/or thief.
- Though under other ownership a bulk fuel facility (Ligon Oil) comprised of approximately 4-10K aboveground storage tanks (ASTs) upgradient and adjacent to the Malvern stormwater conduit did not have spill containment in-place to prevent "run-on" into the Facility. This aspect can be

identified under **Part: 3 Best Management Practices, Limitation and Monitoring Requirements- Subparts 3.1: Best Management Practices, 3.1.1: Minimize Exposure, 3.1.3: Maintenance, 3.1.4: Spill Prevention and Response Procedures.**

- The stormwater wattles installed/placed throughout various locations of the facility were irregularly spaced, small in diameter and not staked/anchored in typical industry methodology. This could negate the purpose of these devices in the prevention or efforts to minimize run-off (**Appendix 1 Photograph #12, Photograph #19 and Photograph #20**).
- Visible sheen at land surface was observed at various locations within the Facility indicative of "abandoned" equipment hydraulic lines, bulk oil drums, etc. not adequately drained/purged. The following NPDES sections were lacking or deficient; **Part: 3 Best Management Practices, Limitation and Monitoring Requirements- Subparts 3.1: Best Management Practices, 3.1.1: Minimize Exposure, 3.1.2: Good Housekeeping, 3.1.3: Maintenance, 3.1.4: Spill Prevention and Response Procedures, 3.1.6: Management of Runoff, 3.1.10, Part 4: Stormwater Pollution Prevention Plan (SWPPP) - Subparts 4.2.3: Facility Description, 4.2.4: Description of Potential Pollutant Sources, 4.2.6: Schedules and Procedures (§4.2.6.1.1, §4.2.6.1.2 and §4.2.6.1.3) (Appendix 1 Photograph #2, Photograph #3, Photograph#4, Photograph #5, Photograph #6 and Photograph #7).**
- Review of the Waste Manifest documents provided by ATI in their written response to a March 14, 2023, Request for Information (RFI), indicates the non-aqueous constituents of "soil, wood chips and debris with hydraulic oil" and aqueous constituents of "creek water with hydraulic oil", though the analytical amounts are not defined (**Appendix 6**). This constituent documentation leads to the potential of "run-off" impacts downstream.
- A review of the 2021/2022 Stormwater Annual Report (SWAR) analytical results indicates, an excursion of the benchmark value for Chemical Oxygen Demand (COD) occurred (**Appendix 5**).
- Debris consistent with wastewater sanitary sewer overflow (SSO) events was visible at several locations along various Facility perimeter locations. **Part: 3 Best Management Practices, Limitation and Monitoring Requirements- Subparts 3.1: Best Management Practices, 3.1.1: Minimize Exposure (Appendix 1 Photograph #21 and Photograph #22).**
- Poor housekeeping, inclusive of staged debris (equipment, motor vehicles, replaced parts, drums, wooden pallets, tires, etc.) throughout the facility are an invitation to vermin attraction. The following NPDES sections were lacking or deficient; **Part: 3 Best Management Practices, Limitation and Monitoring Requirements- Subparts 3.1: Best Management Practices, 3.1.1: Minimize Exposure, 3.1.2: Good Housekeeping, 3.1.3: Maintenance, 3.1.4: Spill Prevention and Response Procedures, 3.1.6: Management of Runoff, 3.1.10: Waste, Garbage and Floatable Debris (Appendix 1 Photograph #16, Photograph #17 and Photograph #18).**
- Review of the electronic copy of the Stormwater Pollution Prevention Plan (SWPPP), originally adopted in October 1993 and revised in December 2022 and again in March 2023 was reviewed. The following NPDES sections were lacking or deficient; **Part 4: Stormwater Pollution Prevention Plan (SWPPP)- Subparts 4.2.3: Facility Description, 4.2.4: Description of Potential Pollutant Sources, 4.2.6: Schedules and Procedures (§4.2.6.1.1, §4.2.6.1.2 and §4.2.6.1.3).** **Note:** the SWPPP cover photograph taken March 8, 2023, differs from the electronic version cover submitted pursuant to the Request for Information (RFI).
- A review of the 2021/2022 Stormwater Annual Report (SWAR) analytical results indicates, an excursion of the benchmark value for Chemical Oxygen Demand (COD) occurred. The following NPDES sections were lacking or deficient; **Part: 3 Best Management Practices, Limitation and Monitoring Requirements- Subpart 3.12.1**
- There is No Spill Prevention, Control and Countermeasure (SPCC) plan for this Facility. The information provided by ATI in their written response to a March 14, 2023, Request for

Information (RFI), indicates the Facility maintains on-site 1-100-gallon, 2-350-gallon, 2-550-gallon, 2-1K-gallon, and 1-12.5K-gallon bulk petroleum storage tanks (16.6K Total). Note: observation indicated the facility had recently completed some concrete containment berms around the various ASTs though, those with containment needed pumping and/or cleaning. In accordance with §311 of the Clean Water Act (CWA) (<https://www.epa.gov/oil-spills-prevention-and-preparedness-regulations>) and the SPCC Rule (40 CFR 112), a SPCC plan is required (Appendix 3 Request for Information (RFI) Response).

EPA Region 6 inspector David Esparza conducted a closing conference at Anthony Timberlands-Malvern facility on March 8, 2023, for the inspection.

Section IV – FOLLOW UP

The following information was received by EPA on March 16, 2023, in an ATI “redline” explanation to the March 14, 2023, Request for Information (RFI) after exiting the Facility on March 8, 2023:

- A complete electronic copy of your current Stormwater Pollution Prevention Plan (SWPPP), inclusive of all on-site inspection reports for the previous two (2) years.
Reply: See attached “Stormwater Pollution Prevention Plan – March 2023” and “Quarterly and Annual Stormwater Inspections”
- A legible electronic copy of your “Exhibit A” (Redline Plan Sheet #D502001E).
Reply: See “Malvern Exhibit A” and “Malvern – Exhibit A Explanation”
- A current copy of the facility Site Map delineating the total foot-print area, locations/volumes of the onsite fuel storage tanks, and outfalls.
Reply: See “Malvern Site Map with Total Site Area.” When combined with “Malvern Exhibit A,” I believe that the total area, locations/volumes of petroleum storage tanks, and outfalls are all covered.
An electronic copy of your Spill Prevention, Control, and Countermeasure (SPCC) pertaining to your on-site fuel storage.
Reply: The facility is currently in the process of installing additional secondary containments in a couple of areas. The facility hopes to have these complete along with our SPCC within the next 60 days.
- Electronic copies of your waste manifests for your on-site oil/water separator regarding the transport/disposal for the previous two (2) years.
Reply: I have attached these in a few separate emails due to the file size. We have had a large number of waste manifests. Only a small amount is related to the oil/water separator, but that material is not differentiated in the manifests since it has the same profile as our other disposals.
- Electronic copies of your Stormwater Annual Report (SWAR) for the previous two (2) years, inclusive appurtenant analytical analysis.
Reply: See attached “2021 and 2022 SWAR”
- Electronic copies of your calibration and maintenance records for your continuous monitoring instrumentation, inclusive of serial numbers (S/N).
Reply: The facility does not have any continuous monitoring instrumentation.

Section V – LIST OF APPENDICES

- Appendix 1 – Anthony Timberlands-Malvern Photographic Log- March 8, 2023
- Appendix 2 – Malvern NPDES Permit
- Appendix 3 – March 14, 2023, Request for Information (RFI) Response
- Appendix 4 – SWPPP with attachments (Site Map, Exhibit A, Exhibit A Explanation, and
Inspection Reports)
- Appendix 5 – 2021/2022 Stormwater Annual Report (SWAR)
- Appendix 6 – Representative Waste Manifests
- Appendix 7 – Remediation and Maintenance Plan prepared by ECCI on behalf of ATI and ADEQ
Approval Letter

Appendix 1

Photograph Log

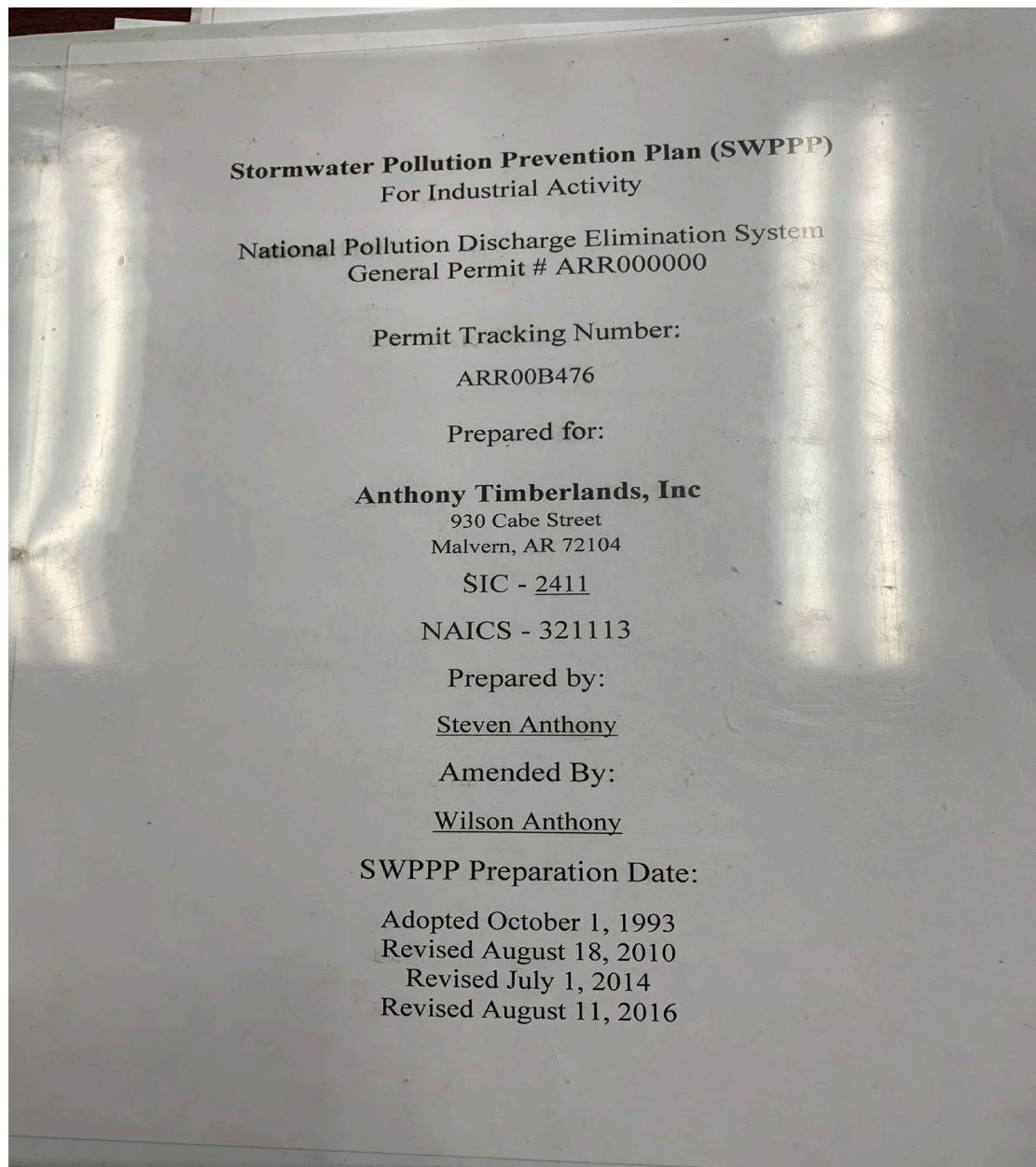


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



Photograph of the Malvern SWPPP Cover Page while on-site. Note: the respective dates versus the date cited in Appendix 4. (IMG_0164) (10:59 AM) Photographed by D. Esparza



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



View of visible sheen at land surface was observed at various locations. (DSCN2401) photographed by C. Sherwood.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



Visible sheen at land surface was observed at various locations within the facility indicative of "abandoned" equipment hydraulic lines, bulk oil drums, etc. have not been adequately drained/purged. (DSCN2419) Photographed by C. Sherwood.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



Another photograph of "petroleum products" mixed with rainfall sitting at land surface. (IMG_0168)
Photographed by D. Esparza.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



Another photograph of "petroleum products" mixed with rainfall sitting at land surface. (IMG_0167)
Photographed by D. Esparza.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



Another photograph of “petroleum products” mixed with rainfall sitting at land surface. Note: the disconnected hydraulic line exhibiting visible staining and indicative evidence the line had not been purged. (IMG_0170) Photographed by D. Esparza.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



View of some of the bulk oil drums on-site. Note: the staged debris in the background (equipment, motor vehicles, replaced parts, tires, drums, wooden pallets, etc.) throughout the facility invite vermin attraction. (DSCN2406) Photographed by C. Sherwood.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



View of one (1) of the Facility on-sites ASTs and a recently completed concrete containment berm Note: the lack of proper labeling or signage. (DSCN2396) Photographed by C. Sherwood.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



View a recently completed concrete containment berm around an AST. Note: those with containment needed pumping and/or cleaning. Additionally, it was not clear if those ASTs with containment berms were consistent with recognized protocol of 110% of volume (DSCN2398) Photographed by C. Sherwood.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



View of one (1) of the Facility on-sites ASTs. **Note:** the lack of proper labeling, signage, containment, and existing damage. (DSCN2432) Photographed by C. Sherwood.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



Another view of one (1) of the Facility on-sites ASTs and a recently completed concrete containment berm Note: the lack of proper labeling or signage. (DSCN2347) Photographed by C. Sherwood.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



View of one (1) of the Facility on-sites ASTs. **Note:** the lack of proper labeling, signage, and containment. **Note:** The stormwater wattles installed/placed adjacent to the AST are small in diameter and not staked in typical industry methodology. (IMG_0178) Photographed by D. Esparza.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



View of one (1) of the Facility on-sites ASTs. **Note:** the lack of proper labeling, signage, containment, and damaged bollard. (IMG_0179) Photographed by D. Esparza.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



View of one (1) of the Facility on-sites ASTs. **Note:** the lack of proper labeling, signage, containment, staining (overfill) and damaged bollard. (IMG_0182) Photographed by D. Esparza.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



View of additional the staged debris in the background (equipment, motor vehicles, replaced parts, tires, drums, wooden pallets, etc.) throughout the facility invite vermin attraction. (IMG_0171) Photographed by D. Esparza.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



Housekeeping, inclusive of staged debris (equipment, motor vehicles, replaced parts, tires, drums, wooden pallets, etc.) throughout the facility invite vermin attraction. (DSCN2407) Photographed by C. Sherwood.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



Another view of the Facility housekeeping, inclusive of staged debris (equipment, motor vehicles, replaced parts, tires, drums, wooden pallets, etc.) throughout the facility invite vermin attraction. . (IMG_0174) Photographed by D. Esparza.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



Another view of the Facility housekeeping, inclusive of staged debris (equipment, motor vehicles, replaced parts, tires, drums, wooden pallets, etc.) throughout the facility invite vermin attraction. . (IMG_0175) Photographed by D. Esparza.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



The stormwater wattles installed/placed throughout various locations of the facility were irregularly spaced, small in diameter and not staked in typical industry methodology. (DSCN2438) Photographed by C. Sherwood.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



The stormwater wattles installed/placed throughout various locations of the facility were irregularly spaced, small in diameter and not staked in typical industry methodology. (DSCN2452) Photographed by C. Sherwood.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



Debris consistent with a wastewater sanitary sewer overflow (SSO) events was visible at several locations. (DSCN2468) Photographed by C. Sherwood.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Anthony Timberlands- Malvern		
City: Malvern	County/Parish: Hot Spring	State: Arkansas



Debris consistent with a wastewater sanitary sewer overflow (SSO) events was visible at several locations (DSCN2470) Photographed by C. Sherwood.

Appendix 2

Anthony Timberlands-Malvern NPDES Permit



ARKANSAS

ENERGY & ENVIRONMENT

Permit Tracking Number: **ARR00B476**
AFIN: **30-00084**

NOTICE OF COVERAGE (NOC) INDUSTRIAL STORMWATER GENERAL PERMIT ARR000000

Attn: Wilson Anthony, Director of Regulatory Compliance
Anthony Timberlands, Inc.
P.O. Box 743
Malvern, AR 72104

This modification of the Notice of Coverage (NOC) for the above General Permit is based on the information received on December 19, 2022, to add outfalls 002 and 003 for the assigned permit tracking number ARR00B476 and AFIN 30-00084. Any permit-related correspondence must include these numbers. This NOC is issued in reliance upon the statements and representations made in the submittal for the following facility:

Permittee (Legal Name): Anthony Timberlands, Inc.
Facility Name: Anthony Timberlands, Inc.
Permit Tracking No.: ARR00B476
AFIN: 30-00084
Industrial Sector: A1
Facility Address: 703 Cabe Street, Malvern, AR 72104 in Hot Spring County
Facility Coordinates: Latitude: 34° 21' 47" N; Longitude: 92° 49' 15" W

The Division has no responsibility for adequacy or proper function of the Best Management Practices (BMPs) implemented under the terms of this permit. Compliance with all conditions and limitations of the renewal general permit is required. Please be advised that the permit contains monitoring requirements. Under the general permit, you must keep the Stormwater Annual Report (SWAR) Form at the facility (submittal to the Division is not required) and make it available to DEQ staff upon request. The general permit and Stormwater Annual Report Form to be used are available on the Division's website at the address below:

<https://www.deq.state.ar.us/water/permits/npdes/stormwater/>

Discharges allowed by the permit shall only occur at the following outfalls:

Outfall 001:	Latitude: 34° 21' 43" N;	Longitude: 92° 49' 26" W
Outfall 002:	Latitude: 34° 21' 55.71" N;	Longitude: 92° 49' 27.10" W
Outfall 003:	Latitude: 34° 21' 55.83" N;	Longitude: 92° 49' 26.43" W

Expiration Date: June 30, 2024

Bryan Leamons, P.E.
Senior Operations Manager
Office of Water Quality, Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR, 72118

January 12, 2023

Modification Date

**AUTHORIZATION TO DISCHARGE STORMWATER UNDER
THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM AND THE ARKANSAS WATER
AND AIR POLLUTION CONTROL ACT**

In accordance with the provisions of the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 et seq.), and the Clean Water Act (33 § U.S.C. 1251 et seq.),

Facilities Discharging Stormwater Associated With Industrial Activity

are authorized to discharge to all receiving waters except as stated in Part 1.8 (Limitations on Coverage) in accordance with eligibility requirements, Notice of Intent (NOI) requirements, Stormwater Pollution Prevention Plan (SWPPP) requirements, effluent limitations, monitoring requirements, and other conditions set forth in this permit.

For facilities that are eligible for coverage under this Stormwater Industrial General Permit (IGP), the Department sends a Notice of Coverage (NOC) with tracking permit number starting with ARR00 to the facility. The NOC includes the Department's determination that a facility is covered under this permit, and may specify alternate requirements outlined in the permit.

Effective Date: 07/01/2019

Expiration Date: 06/30/2024



Caleb J. Osborne
Associate Director
Office of Water Quality
Arkansas Department of Environmental Quality

11.6.18

Issuance Date

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ABBREVIATIONS

APC&EC - Arkansas Pollution Control and Ecology Commission
BAT - best available technology economically achievable
BCT - best conventional pollutant control technology
BMP - best management practice
BOD₅ - five-day biochemical oxygen demand
BPT - best practicable control technology currently available
CFR - Code of Federal Regulations
COD - chemical oxygen demand
CPP - continuing planning process
CWA - Clean Water Act
DO - dissolved oxygen
ELG - effluent limitation guidelines
EPA - United States Environmental Protection Agency
ESA - Endangered Species Act
FCB - fecal coliform bacteria
IGP - Stormwater Industrial General Permit ARR000000
MQL - minimum quantification level
NAICS - North American Industry Classification System
NPDES - National Pollutant Discharge Elimination System
O&G - oil and grease
Reg. 2 - APC&EC Regulation No. 2
Reg. 6 - APC&EC Regulation No. 6
Reg. 8 - APC&EC Regulation No. 8
Reg. 9 - APC&EC Regulation No. 9
SIC - standard industrial classification
SWPPP – stormwater pollution prevention plan
TMDL - total maximum daily load
TP - total phosphorus
TSS - total suspended solids
USF&WS - United States Fish and Wildlife Service
USGS - United States Geological Survey
WET - whole effluent toxicity
WQS - water quality standards

PART 1: PERMIT REQUIREMENTS

- 1.1 Coverage Under This Permit.** This Stormwater Industrial General Permit (IGP) authorizes discharges from facilities composed of stormwater associated with industrial activity, as defined in Part 8.33, where those discharges enter waters of the State, or a Municipal Separate Storm Sewer System (MS4) leading to waters of the State. The purpose of this permit is to minimize the discharge of stormwater pollutants from industrial activity. The operator shall read and understand the conditions of the permit.
- 1.2 Availability of Permit, Forms, and Information.** A copy of this general permit, forms, reference materials, and other information is available on the Stormwater webpage of the ADEQ web site:

<https://www.adeq.state.ar.us/water/permits/npdes/stormwater/> .

Hard copies may also be obtained by contacting the General Permits Section of the Office of Water Quality at (501) 682-0623 or by writing to:

General Permits Section
Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

- 1.3 Permit Area.** This permit includes all areas within the State of Arkansas.
- 1.4 Eligibility.** The following stormwater discharges are eligible for coverage under this permit, unless otherwise made ineligible under Part 1.8:
- 1.4.1** All new and existing discharges composed entirely of stormwater associated with industrial activity from the facility's primary industrial activity, as defined in Part 8.33, and provided the primary industrial activity is included in Part 1.5.
- 1.4.2** Discharges designated by the Department as needing a stormwater permit. The Department may notify a facility that a stormwater permit is needed. Any such notice will briefly state the reason for such a decision.
- 1.4.3** Discharges subject to any of the national stormwater-specific effluent limitations guidelines listed below.

Regulated Discharge	40 CFR Section
Runoff from material storage piles at cement manufacturing facilities	Part 411 Subpart C
Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, byproducts or waste products (SIC 2874)	Part 418, Subpart A
Runoff from coal storage piles at steam electric generating facilities	Part 423
Runoff from asphalt emulsion facilities	Part 443 Subpart A
Runoff from airport deicing at primary airports	Part 449 Subpart A
Mine dewatering	Part 436 Subparts B and C

- 1.5 Categories of Facilities Covered by this Permit:** This permit is available for stormwater discharges from the following sectors of industrial activities, as well as any discharge not covered under the general sectors that has been identified by the Department as appropriate for coverage. The sector descriptions below are based on Standard Industrial Classification (SIC) Codes and Industrial Activity Codes consistent with the definition of stormwater discharge associated with industrial activity at 40 CFR 122.26(b)(14)(i-ix, xi). Some Industrial Sectors have additional eligibility requirements that must be met before permit coverage is required. Please refer to 40 CFR 122.26(b)(14)(i-ix, xi) for full sector activity descriptions. The sectors are listed in the following table:

Sectors of Industrial Activity Covered by This Permit		
Sector and Sub-sector	SIC Code or Activity Code	Activity Represented
SECTOR A: TIMBER PRODUCTS		
A1	2421	General Sawmills and Planing Mills
A2	2491	Wood Preserving
A3	2411	Log Storage and Handling
A4	2426	Hardwood Dimension and Flooring Mills
	2429	Special Product Sawmills, Not Elsewhere Classified
	2431-2439 (except 2434)	Millwork, Veneer, Plywood, and Structural Wood (see Sector W)
	2448	Wood Pallets and Skids
	2449	Wood Containers, Not Elsewhere Classified
	2451, 2452	Wood Buildings and Mobile Homes
	2493	Reconstituted Wood Products
	2499	Wood Products, Not Elsewhere Classified
A5	2441	Nailed and Lock Corner Wood Boxes and Shook
SECTOR B: PAPER AND ALLIED PRODUCTS		
B1	2631	Paperboard Mills
B2	2611	Pulp Mills
	2621	Paper Mills
	2652-2657	Paperboard Containers and Boxes
	2671-2679	Converted Paper and Paperboard Products, Except Containers and Boxes
SECTOR C: CHEMICALS AND ALLIED PRODUCTS		
C1	2873-2879	Agricultural Chemicals
C2	2812-2819	Industrial Inorganic Chemicals
C3	2841-2844	Soaps, Detergents, and Cleaning Preparations; Perfumes, Cosmetics, and Other Toilet Preparations
C4	2821-2824	Plastics Materials and Synthetic Resins, Synthetic Rubber, Cellulosic and Other Manmade Fibers Except Glass
C5	2833-2836	Medicinal Chemicals and Botanical Products; Pharmaceutical Preparations; in vitro and in vivo Diagnostic Substances; and Biological Products, Except Diagnostic Substances
	2851	Paints, Varnishes, Lacquers, Enamels, and Allied Products
	2861-2869	Industrial Organic Chemicals
	2891-2899	Miscellaneous Chemical Products
	3952 (limited to list of inks and paints)	Inks and Paints, Including China Painting Enamels, India Ink, Drawing Ink, Platinum Paints for Burnt Wood or Leather Work, Paints for China Painting, Artist's Paints and Artist's Watercolors
	2911	Petroleum Refining
SECTOR D: ASPHALT PAVING AND ROOFING MATERIALS AND LUBRICANTS		
D1	2951, 2952	Asphalt Paving and Roofing Materials
D2	2992, 2999	Miscellaneous Products of Petroleum and Coal

Sectors of Industrial Activity Covered by This Permit		
Sector and Sub-sector	SIC Code or Activity Code	Activity Represented
SECTOR E: GLASS, CLAY, CEMENT, CONCRETE, AND GYPSUM PRODUCTS		
E1	3251-3259	Structural Clay Products
	3261-3269	Pottery and Related Products
E2	3271-3275	Concrete, Gypsum, and Plaster Products
E3	3211	Flat Glass
	3221, 3229	Glass and Glassware, Pressed or Blown
	3231	Glass Products Made of Purchased Glass
	3241	Hydraulic Cement
	3281	Cut Stone and Stone Products
	3291-3299	Abrasive, Asbestos, and Miscellaneous Nonmetallic Mineral Products
SECTOR F: PRIMARY METALS		
F1	3312-3317	Steel Works, Blast Furnaces, and Rolling and Finishing Mills
F2	3321-3325	Iron and Steel Foundries
F3	3351-3357	Rolling, Drawing, and Extruding of Nonferrous Metals
F4	3363-3369	Nonferrous Foundries (Castings)
F5	3331-3339	Primary Smelting and Refining of Nonferrous Metals
	3341	Secondary Smelting and Refining of Nonferrous Metals
	3398, 3399	Miscellaneous Primary Metal Products
SECTOR G: METAL MINING (ORE MINING AND DRESSING)		
G1	1021	Copper Ore and Mining Dressing Facilities
G2	1011	Iron Ores
	1021	Copper Ores
	1031	Lead and Zinc Ores
	1041, 1044	Gold and Silver Ores
	1061	Ferroalloy Ores, Except Vanadium
	1081	Metal Mining Services
	1094, 1099	Miscellaneous Metal Ores
SECTOR H: COAL MINES AND COAL MINING-RELATED FACILITIES		
H1	1221-1241	Coal Mines and Coal Mining-Related Facilities
SECTOR I: OIL AND GAS EXTRACTION AND REFINING		
I1	1311	Crude Petroleum and Natural Gas
	1321	Natural Gas Liquids
	1381-1389	Oil and Gas Field Services
SECTOR J: MINERAL MINING AND DRESSING		
J1	1442	Construction Sand and Gravel
	1446	Industrial Sand
J2	1411	Dimension Stone
	1422-1429	Crushed and Broken Stone, Including Rip Rap
	1481	Nonmetallic Minerals Services, Except Fuels
	1499	Miscellaneous Nonmetallic Minerals, Except Fuels

Sectors of Industrial Activity Covered by This Permit		
Sector and Sub-sector	SIC Code or Activity Code	Activity Represented
J3	1455, 1459	Clay, Ceramic, and Refractory Materials
	1474-1479	Chemical and Fertilizer Mineral Mining
SECTOR K: HAZARDOUS WASTE TREATMENT, STORAGE, OR DISPOSAL FACILITIES		
K1	HZ	Hazardous Waste Treatment, Storage, or Disposal Facilities, including those that are operating under interim status or a permit under subtitle C of RCRA
SECTOR L: LANDFILLS, LAND APPLICATION SITES, AND OPEN DUMPS		
L1	LF	Municipal Solid Waste Landfill (MSWLF) Areas Closed in Accordance with 40 CFR 258.60
L2	LF	All Landfill, Land Application Sites and Open Dumps, except Municipal Solid Waste Landfill (MSWLF) Areas Closed in Accordance with 40 CFR 258.60
SECTOR M: AUTOMOBILE SALVAGE YARDS		
M1	5015	Automobile Salvage Yards
SECTOR N: SCRAP RECYCLING FACILITIES		
N1	5093	Scrap Recycling and Waste Recycling Facilities except Source-Separated Recycling
N2	5093	Source-separated Recycling Facility
SECTOR O: STEAM ELECTRIC GENERATING FACILITIES		
O1	SE	Steam Electric Generating Facilities, including coal handling sites
SECTOR P: LAND TRANSPORTATION AND WAREHOUSING		
P1	4011, 4013	Railroad Transportation
	4111-4173	Local and Highway Passenger Transportation
	4212-4231	Motor Freight Transportation and Warehousing
	4311	United States Postal Service
	5171	Petroleum Bulk Stations and Terminals
SECTOR Q: WATER TRANSPORTATION		
Q1	4412-4499	Water Transportation Facilities
SECTOR R: SHIP AND BOAT BUILDING AND REPAIRING YARDS		
R1	3731, 3732	Ship and Boat Building or Repairing Yards
SECTOR S: AIR TRANSPORTATION FACILITIES		
S1	4512-4581	Air Transportation Facilities
SECTOR T: TREATMENT WORKS		
T1	TW	Treatment Works treating domestic sewage or any other sewage sludge or wastewater treatment device or system, used in the storage, treatment, recycling, and reclamation of municipal or domestic sewage, including land dedicated to the disposal of sewage sludge that are located within the confines of the facility, with a design flow of 1.0 MGD or more, or required to have an approved pretreatment program under 40 CFR Part 403. Not included are farm lands, domestic gardens or lands used for sludge management where sludge is beneficially reused and which are not physically located in the confines of the facility, or areas that are in compliance with section 405 of the CWA.

Sectors of Industrial Activity Covered by This Permit		
Sector and Sub-sector	SIC Code or Activity Code	Activity Represented
SECTOR U: FOOD AND KINDRED PRODUCTS		
U1	2041-2048	Grain Mill Products
U2	2074-2079	Fats and Oils Products
U3	2011-2015	Meat Products
	2021-2026	Dairy Products
	2032-2038	Canned, Frozen, and Preserved Fruits, Vegetables, and Food Specialties
	2051-2053	Bakery Products
	2061-2068	Sugar and Confectionery Products
	2082-2087	Beverages
	2091-2099	Miscellaneous Food Preparations and Kindred Products
	2111-2141	Tobacco Products
SECTOR V: TEXTILE MILLS, APPAREL, AND OTHER FABRIC PRODUCT MANUFACTURING; LEATHER AND LEATHER PRODUCTS		
V1	2211-2299	Textile Mill Products
	2311-2399	Apparel and Other Finished Products Made from Fabrics and Similar Materials
	3131-3199	Leather and Leather Products (note: see Sector Z1 for Leather Tanning and Finishing)
SECTOR W: FURNITURE AND FIXTURES		
W1	2434	Wood Kitchen Cabinets
	2511-2599	Furniture and Fixtures
SECTOR X: PRINTING AND PUBLISHING		
X1	2711-2796	Printing, Publishing, and Allied Industries
SECTOR Y: RUBBER, MISCELLANEOUS PLASTIC PRODUCTS, AND MISCELLANEOUS MANUFACTURING INDUSTRIES		
Y1	3011	Tires and Inner Tubes
	3021	Rubber and Plastics Footwear
	3052, 3053	Gaskets, Packing and Sealing Devices, and Rubber and Plastic Hoses and Belting
	3061, 3069	Fabricated Rubber Products, Not Elsewhere Classified
Y2	3081-3089	Miscellaneous Plastics Products
	3931	Musical Instruments
	3942-3949	Dolls, Toys, Games, and Sporting and Athletic Goods
	3951-3955 (except 3952 – see Sector C)	Pens, Pencils, and Other Artists' Materials
	3961, 3965	Costume Jewelry, Costume Novelties, Buttons, and Miscellaneous Notions, Except Precious Metal
	3991-3999	Miscellaneous Manufacturing Industries
SECTOR Z: LEATHER TANNING AND FINISHING		
Z1	3111	Leather Tanning and Finishing

Sectors of Industrial Activity Covered by This Permit		
Sector and Sub-sector	SIC Code or Activity Code	Activity Represented
SECTOR AA: FABRICATED METAL PRODUCTS		
AA1	3411-3499 (except 3479)	Fabricated Metal Products, Except Machinery and Transportation Equipment, and Coating, Engraving, and Allied Services.
	3911-3915	Jewelry, Silverware, and Plated Ware
AA2	3479	Fabricated Metal Coating and Engraving
SECTOR AB: TRANSPORTATION EQUIPMENT, INDUSTRIAL OR COMMERCIAL MACHINERY		
AB1	3511-3599 (except 3571-3579)	Industrial and Commercial Machinery, Except Computer and Office Equipment (see Sector AC)
	3711-3799 (except 3731, 3732)	Transportation Equipment Except Ship and Boat Building and Repairing (see Sector R)
SECTOR AC: ELECTRONIC, ELECTRICAL, PHOTOGRAPHIC, AND OPTICAL GOODS		
AC1	3571-3579	Computer and Office Equipment
	3812-3873	Measuring, Analyzing, and Controlling Instruments; Photographic and Optical Goods, Watches, and Clocks
	3612-3699	Electronic and Electrical Equipment and Components, Except Computer Equipment
SECTOR AD: NON-CLASSIFIED FACILITIES		
AD1	Other stormwater discharges designated by the Director as needing a permit (see 40 CFR 122.26(a)(9)(i)(C) & (D)) or any facility discharging stormwater associated with industrial activity not described by any of Sectors A-AC. NOTE: Facilities may not elect to be covered under Sector AD. Only the Director may assign a facility to Sector AD.	

1.6 Allowable Non-stormwater Discharges. The following non-stormwater discharges are authorized by this permit:

- 1.6.1 discharges from emergency firefighting activities;
- 1.6.2 fire hydrant flushings;
- 1.6.3 potable water sources including waterline flushings;
- 1.6.4 runoff from irrigation using non-process water;
- 1.6.5 landscape watering provided all pesticides, herbicides, and fertilizers have been applied in accordance with the approved labeling;
- 1.6.6 uncontaminated routine external building washdown which does not use detergents;
- 1.6.7 uncontaminated pavement wash waters where spills or leaks of toxic or hazardous materials have not occurred (unless all spilled material has been removed) and where detergents are not used;
- 1.6.8 air compressor condensate;
- 1.6.9 steam condensate;
- 1.6.10 uncontaminated condensate from air conditioners, coolers, and other compressors and from the outside storage of refrigerated gases or liquids (such as the discharge of thawed condensate from the surface of liquid nitrogen tanks stored outdoors);
- 1.6.11 incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but not intentional discharges from the cooling tower (e.g., “piped” cooling tower blowdown or drains);
- 1.6.12 uncontaminated ground water or spring water (See Note Below);
- 1.6.13 foundation or footing drains where flows are not contaminated with process materials such as solvents, or other toxic or hazardous material (see Note below);
- 1.6.14 excavation dewatering (see Note below and the definition in Part 8.11); and
- 1.6.15 non-process water used for dust suppression on uncontaminated roads.

NOTE: There shall be no turbid discharges to surface waters of the state resulting from dewatering activities. If trench or ground waters contain sediment, it must pass through a sediment settling pond or other equally effective sediment control device, prior to being discharged. Alternatively, sediment may be removed by settling in place or by dewatering into a sump pit, filter bag, or comparable practice. Ground water dewatering which does not contain sediment or other pollutants is not required to be treated prior to discharge. However, care must be taken when discharging ground water to ensure that it does not become pollutant-laden by traversing over disturbed soils or other pollutant sources.

1.7 Conditional No Exposure Exclusion. In accordance with 40 CFR 122.26(g), a No Exposure Exclusion is a conditional exclusion applicable to all categories of industrial activity (except construction activity) with no exposure of industrial materials and activities to stormwater. All facilities with point source discharges composed entirely of stormwater associated with industrial activity that satisfy criteria of no exposure and complete the No Exposure Exclusion Certification Form will be able to obtain exclusion from this general permit. The Exclusion is available on a facility-wide basis only, not for individual outfalls. If any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the No Exposure Exclusion. To apply for a No Exposure Exclusion, a complete and accurate No Exposure Exclusion Certification Form and an initial permit fee as required under the provisions of Reg. 9 should be submitted. Subsequent annual fees will be billed by the Department. Facilities operating under a 2014 Industrial Stormwater General Permit No Exposure Exclusion must submit a Recertification NOI under Part 2.2, assuming the facility still qualifies for the exclusion.

1.8 Limitations on Coverage (Exclusions). The following stormwater discharges associated with industrial activity are not covered by this permit:

- 1.8.1 **Discharges Mixed with Non-Stormwater.** Stormwater discharges associated with industrial activity that are mixed with sources of non-stormwater, except for non-stormwater discharges that are identified by and in compliance with Part 1.6 of the permit.

1.8.2 Stormwater Discharges Associated with Construction Activity. Stormwater discharges associated with construction activity disturbing one acre or more are not eligible for coverage under this permit, even if a permittee currently has coverage under this permit.

1.8.3 Discharges Currently Covered by Another Permit. A facility is not eligible for coverage under this permit unless stormwater requirements from the individual permit can be transferred to this general permit. In order to avoid conflict with the “anti-backsliding” provisions of the Clean Water Act (CWA), a permit transfer will only be allowed where the outfall in the individual permit did not contain numeric water quality-based limitations with an exception of pH. A pH range limit would not necessarily be considered a water-quality based limit unless developed to address known discharge problems at a particular facility. Compliance with the numeric limitations under the individual permit could also be criteria for eligibility to transfer from an individual permit to the general permit.

1.8.4 Discharges Subject to Effluent Guidelines. Stormwater discharges associated with industrial activity from facilities which are subject to existing effluent guideline limitations addressing stormwater with the exception of those listed in Part 1.4.3.

1.8.5 Discharges into Impaired Receiving Waters (303(d) List). Discharges from a facility into receiving waters listed as impaired under Section 303(d) of the Clean Water Act are not eligible for coverage under this permit, unless the permittee:

- 1.8.5.1 documents that the pollutant(s) for which the waterbody is impaired is not present in the facility’s stormwater discharge(s) and retain documentation of the finding with the SWPPP; or
- 1.8.5.2 incorporate into the SWPPP any additional BMPs needed:
 - 1.8.5.2.1 to prevent to the maximum extent practicable exposure of pollutants to stormwater for which the waterbody is impaired; and
 - 1.8.5.2.2 to sufficiently protect water quality.

Please note that the Department will review this information. If it is determined that the facility will discharge to an impaired water body, then the Department may include additional requirements.

1.8.6 Discharges into Receiving Waters with an Approved TMDL. Discharges from a facility into receiving waters for which there is an established Total Maximum Daily Load (TMDL) allocation are not eligible for coverage under this permit unless:

- 1.8.6.1 the permittee develops and certifies a SWPPP that is consistent with the assumptions and requirements in the approved TMDL; and
- 1.8.6.2 if a specific numeric wasteload allocation has been established that would apply to the facility’s discharges, the operator must incorporate that allocation into its SWPPP and implement necessary steps to meet that allocation.

Please note that the Department will be reviewing this information. If it is determined that the facility will discharge to receiving waters with an approved TMDL, then the Department may require additional BMPs.

1.8.7 Direct Discharges into an Extraordinary Resource Water (ERW), Natural and Scenic Waterway (NSW), or Ecologically Sensitive Waterbody (ESW). Discharges from a facility directly into receiving waters which are listed as an ERW, NSW, or ESW under the authority of Reg. 2 are not eligible for coverage under this permit unless:

- 1.8.7.1 the permittee develops and certifies a SWPPP that includes additional BMPs needed to prevent to the maximum extent practicable exposure of pollutants to stormwater that could potentially impact water quality.

Please note that the Department will review this information. If it is determined that the facility will discharge to an ERW, NSW, or ESW, then the Department may require additional BMPs.

1.8.8 Discharges that the Department has determined will cause impairment or has reason to believe will compromise Water Quality Standards. Discharges from a facility into receiving waters which the Department has determined will cause an impairment, or has reason to believe will compromise Water Quality Standards, are not eligible for coverage under this permit unless:

1.8.8.1 the permittee develops and certifies a SWPPP that includes additional BMPs needed to prevent to the maximum extent practicable exposure of pollutants to stormwater that could potentially impact water quality.

Please note that the Department will review this information. If it is determined that the facility will cause an impairment, or will compromise Water Quality Standards, then the Department may require additional requirements.

1.8.9 Discharges containing polychlorinated biphenyls (PCBs). Discharges of stormwater known to contain PCBs are not eligible for coverage under this permit. Stormwater discharges containing PCBs must be covered under a separate NPDES permit, discharged to a sanitary sewer in accordance with applicable industrial pretreatment requirements, or disposed of otherwise in accordance with applicable law.

PART 2: AUTHORIZATION UNDER THIS PERMIT

2.1 How to Obtain Authorization. To obtain authorization under this permit, one must:

2.1.1 Meet the Part 1.4 eligibility requirements.

2.1.2 Develop a SWPPP according to the requirements in Part 4 of the permit and select, design, install, and implement control measures to meet effluent limitations, water quality standards, and parameter benchmark values.

2.1.3 Submit a complete and accurate Application Package in accordance with Part 2.2, and an initial permit fee as required under the provisions of Reg. 9. Subsequent annual fees will be billed by the Department.

Timeframes for discharge authorization are contained in the table below. Unless notified by the Director to the contrary, Operators who submit such notifications are authorized to discharge stormwater associated with industrial activity under the terms and conditions of this permit after receipt of the Stormwater Industrial General Permit (IGP) Notice of Coverage (NOC).

2.2 Notice of Intent (NOI) Deadlines. Facilities that intend to obtain coverage for stormwater discharges from industrial activity under this general permit or have received authorization to discharge under a previously issued industrial general permit must submit an Application Package and perform additional actions in accordance with the following:

Category	Deadline for Submittal	Application Package	Other Required Actions
New dischargers	Minimum thirty (30) days prior to commencement of stormwater discharge from the facility.	1. Completed NOI 2. SWPPP ¹ 3. Permit Fee	NONE
Existing dischargers under 2014 IGP	The effective date of this permit.	1. Completed Recertification NOI	Update SWPPP, as necessary, to comply with the requirements of Part 4 by the effective date of this permit (Submittal of updated SWPPP is not required.)
New dischargers – No Exposure	Minimum thirty (30) days prior to commencement of stormwater discharge from the facility.	1. Completed No Exposure Exclusion Certification Form 2. Permit Fee	NONE
Existing dischargers under 2014 IGP with No Exposure Exclusion	The effective date of this permit.	1. Completed Recertification NOI	NONE
Existing dischargers with No Exposure Exclusion who no longer qualify for Exclusion	Maximum thirty (30) days after knowledge of disqualification from No Exposure Exclusion.	1. Completed NOI 2. SWPPP ¹	NONE

¹ The Department understands that the SWPPP is a living document and the version submitted with an initial NOI may have portions that are not finalized. All required SWPPP sections must be included in the SWPPP submitted with the application package (even if they are not finalized), and the SWPPP must be certified as required under Part 7.8.

2.3 Contents of the Notice of Intent. The Notice of Intent includes, at a minimum, the following:

- 2.3.1 Permittee Name (Legal Applicant), Permittee, Address, Type, and Telephone Number
- 2.3.2 Invoice Contact Person, Mailing Information, and Telephone Number
- 2.3.3 Facility Name, Mailing Address, Location, Latitude, Longitude, SIC Codes, Description of Business/Process
- 2.3.4 Facility Contact Person and Phone Number
- 2.3.5 Outfall information specific to each and every outfall, including outfall name or number as indicated on site map(s) in the SWPPP, latitude, longitude, and receiving waterbody information.
- 2.3.6 Similar outfall information
- 2.3.7 Other information (i.e. Consulting Name, Address, and Telephone Number)
- 2.3.8 Certification and Signature of Permittee
- 2.3.9 Cognizant Official

2.4 Where to Submit. A complete package should be submitted to the Department at the following address:

General Permits Section
Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

or via ePortal at the following web address: <https://eportal.adeq.state.ar.us/>

or by email to: Water-permit-application@adeq.state.ar.us. Complete documents (NOI, Recertification NOI, No Exposure Exclusion Certification Form, or SWPPP) must be submitted in Adobe Acrobat (.pdf) format.

Unless otherwise specified by the Department, the above mailing address should be used for all correspondence.

NOTE: A Notice of Coverage (NOC) will not be issued until payment has been received by the Department.

2.5 Additional Notification. Facilities which discharge stormwater associated with industrial activity to a small, medium, or large Municipal Separate Storm Sewer System (MS4), as defined in Parts 8.17 and 8.28 of this permit, must submit a copy of the Notice of Intent to the operator of the MS4 within the deadlines provided in Part 2.2 of this permit.

2.6 Change of Facility Name, Ownership, or Authorization.

Facilities that are authorized under this permit, which undergo a change in ownership, facility name, or signatory authorization (i.e., a new cognizant official, responsible person, etc.), must submit a Permit Transfer form to the Department. A Permit Transfer form can be obtained from the General Permits Section of the Office of Water Quality of the ADEQ website at: www.adeq.state.ar.us. For an ownership change, the permit transfer form must be submitted a minimum of 30 days prior to the date the transfer to the new operator will take place. The new owner must comply with the existing permit for the facility during the interim period.

2.7 Terminating Coverage.

2.7.1 Submitting a Notice of Termination. To terminate permit coverage, the permittee must submit a complete and accurate Notice of Termination (NOT). A Notice of Termination form may be obtained from the ADEQ website at: www.adeq.state.ar.us. The permittee is responsible for meeting the terms of this permit until the acceptance of the termination of authorization by the Department.

2.7.2 When to Submit a Notice of Termination.

The permittee must submit a Notice of Termination after:

- 2.7.2.1 The facility has ceased operations, stabilized exposed soils related to industrial activities that have the potential to cause a discharge of sediment, and there are not or no longer will be discharges of stormwater associated with industrial activity from the facility; or
- 2.7.2.2 The facility has obtained coverage under an individual or alternative general permit for all discharges required to be covered by an NPDES permit.

PART 3: BEST MANAGEMENT PRACTICES, LIMITATIONS AND MONITORING REQUIREMENTS

3.1. Best Management Practices. All facilities must comply with the following BMPs. Parts 3.1.1 through 3.1.11 are considered part of every facility's SWPPP unless the permittee has incorporated into the SWPPP adequate justification or data indicating why the BMP does not apply to the facility or the facility's stormwater discharges. BMPs are primarily to be used by the facility as the factors to consider when attempting to prevent pollutants from leaving the facility via stormwater exposed to industrial activities.

3.1.1. Minimize Exposure. The operator must take actions as appropriate to minimize the exposure of potential sources of pollutants in the manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings (although significant enlargement of impervious surface area is not recommended). In minimizing exposure, the operator should pay particular attention to the following:

- use grading, berms, or curbing to prevent runoff of contaminated flows and divert run-on away from these areas;
- locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas);
- clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants;
- use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible;
- use spill/overflow protection equipment;
- drain fluids from equipment and vehicles prior to on-site storage or disposal;
- perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and
- ensure that all washwater drains to a proper collection system (i.e., not the stormwater drainage system).

The discharge of vehicle and equipment washwater, including tank cleaning operations, is not authorized by this permit. These wastewaters must be covered under a separate NPDES permit, discharged to a sanitary sewer in accordance with applicable industrial pretreatment requirements, or disposed of otherwise in accordance with applicable law.

Note: Industrial materials do not need to be enclosed or covered if stormwater runoff from affected areas will not be discharged to receiving waters or if discharges are authorized under another NPDES permit.

3.1.2. Good Housekeeping. The operator must incorporate good housekeeping practices in an effort to keep clean all exposed areas that are potential sources of pollutants, using measures including, but not limited to, sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers.

3.1.3. Maintenance. The operator must regularly inspect, test, maintain, and repair all industrial equipment and systems to avoid situations that may result in leaks, spills, and other releases of pollutants in stormwater discharged to receiving waters. The operator must maintain all control measures that are used in the implementation of the Best Management Practices or to achieve the effluent limits required by this permit in effective operating condition. Nonstructural control measures must also be diligently maintained (e.g., spill response supplies available, personnel appropriately trained). If the operator finds that the control measures need to be replaced or repaired, the operator must make the necessary repairs or modifications as expeditiously as practicable.

3.1.4. Spill Prevention and Response Procedures. The operator must minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur. At a minimum, the operator must implement:

- Procedures for plainly labeling containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides,” etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur;
- Preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling;
- Procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. Employees who may cause, detect, or respond to a spill or leak must be trained in these procedures and have necessary spill response equipment available. If possible, one of these individuals should be a member of the stormwater pollution prevention team (see Part 4.2.2); and
- Procedures for notification of appropriate facility personnel, emergency response agencies, and regulatory agencies. Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, or 40 CFR Part 302, occurs during a 24-hour period, the operator must notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as the operator has knowledge of the discharge. Local requirements may necessitate reporting spills or discharges to local emergency response, public health, or drinking water supply agencies. **Contact information must be in locations that are readily accessible and available.**

3.1.5. Erosion and Sediment Controls. The operator must stabilize exposed areas and control runoff using structural or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants. Among other actions the operator must take to meet this limit, the operator must place flow velocity dissipation devices at discharge locations and within outfall channels where necessary to reduce erosion or settle out pollutants. In selecting, designing, installing, and implementing appropriate control measures, the operator is encouraged to consult with EPA’s web-based resources relating to BMPs for erosion and sedimentation, including the sector-specific *Industrial Stormwater Fact Sheet Series* (<https://www.epa.gov/npdes/industrial-stormwater-fact-sheet-series>), *National Menu of Best Management Practices (BMPs) for Stormwater* (<https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#edu>), and *Urban Runoff: National Management Measures* (<https://www.epa.gov/nps/urban-runoff-national-management-measures>), and any similar publications.

3.1.6. Management of Runoff. The operator must implement appropriate measures to manage the runoff from the property in such a manner as to minimize the pollutants in the discharge. These measures may include, but are not limited to, the diversion of the runoff away from areas where pollutants may be present or the reuse of stormwater runoff where practicable, by the use of measures that divert the runoff, contain the runoff, or allow for reuse of the runoff. In selecting, designing, installing, and implementing appropriate control measures, the operator is encouraged to consult with EPA’s web-based resources relating to runoff management, including the sector-specific *Industrial Stormwater Fact Sheet Series* (<https://www.epa.gov/npdes/industrial-stormwater-fact-sheet-series>), *National Menu of Best Management Practices (BMPs) for Stormwater* (<https://www.epa.gov/npdes/national-menu-best-management-practices-bmps-stormwater#edu>), and *Urban Runoff: National Management Measures* (<https://www.epa.gov/nps/urban-runoff-national-management-measures>), and any similar publications.

3.1.7. Salt Storage Piles or Piles Containing Salt. The operator must enclose or cover storage piles of salt, or piles containing salt, used for deicing or other commercial or industrial purposes, including maintenance of paved surfaces. The operator must implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile. Piles do not need to be enclosed or covered if stormwater runoff from the piles is not discharged or if discharges from the piles are authorized under another NPDES permit.

3.1.8. Employee Training. The operator must train all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. Training for employees whose job duties include implementation of pollution prevention measures or Stormwater Pollution Prevention Team members must cover both the specific control measures used in the implementation of the BMPs in this Part, and monitoring, inspection, planning, reporting, and documentation requirements in other parts of this permit. Training for employees who work in areas where industrial materials or activities are exposed to stormwater, but whose job duties do not include implementation of pollution prevention measures should cover the specific control measures and BMPs used in the facility area in which they work. The Department recommends training be conducted at least annually (or more often if employee turnover is high).

3.1.9. Non-Stormwater Discharges. The operator must eliminate non-stormwater discharges not authorized by an NPDES permit. See Part 1.6 for a list of non-stormwater discharges authorized by this permit.

3.1.10. Waste, Garbage and Floatable Debris. The operator must take actions as appropriate to ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged.

3.1.11. Dust Generation and Vehicle Tracking of Industrial Materials. The operator must take actions as appropriate to minimize generation of dust and off-site tracking of raw, final, or waste materials.

3.2. Water Quality Standards. Any discharge of stormwater associated with industrial activity must be controlled as necessary to meet applicable water quality standards. New discharges or increased loadings from existing discharges must be consistent with the Arkansas Anti-Degradation Policy in Reg. 2. The Department expects that compliance with the other conditions in this permit will control discharges as necessary to meet applicable water quality standards. If at any time the facility becomes aware, or the Department determines, that the facility's discharge causes or contributes to an exceedance of applicable water quality standards, the permittee must take corrective action as required, document the corrective actions as required, and report the corrective actions to the Department.

3.3. Numeric Effluent Limitations based on Effluent Limitations Guidelines. Permittees subject to one of the Effluent Limitation Guidelines identified in Part 1.4.3 must comply with the following limits:

3.3.1. The effluent limits referenced in the table below must be met, based on whether a facility has stormwater associated with the industrial activities listed below:

CFR Industry		Parameter	Limitation	Monitoring Requirements	
Category	Subcategory			Frequency	Sample Type
Cement Manufacturing 40 CFR 411	Runoff from material storage piles	pH	6.0-9.0 s.u.	once/year	grab
		Total Suspended Solids (TSS)	50 mg/l (Daily Max)	once/year	grab
Fertilizer Manufacturing 40 CFR 418	Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, byproducts or waste products	pH	6.0-9.0 s.u.	once/year	grab
		Total Phosphorus	105 mg/l (Daily Max)	once/year	grab
			35 mg/l (30-day Avg)	once/year	grab
		Fluoride	75 mg/l (Daily Max)	once/year	grab
			25 mg/l (30-day Avg)	once/year	grab

CFR Industry		Parameter	Limitation	Monitoring Requirements	
Category	Subcategory			Frequency	Sample Type
Steam powered electric power generating 40 CFR 423	Runoff from coal piles	pH	6.0-9.0 s.u.	once/year	grab
		TSS ¹	50 mg/l (Daily Max)	once/year	grab
Paving and roofing materials (tars and asphalt) 40 CFR 443	Runoff from manufacturing of asphalt paving or roofing emulsion	TSS	23 mg/l (Daily Max)	once/year	grab
			15.mg/l (30-day Avg)	once/year	grab
		pH	6.0-9.0 s.u.	once/year	grab
		Oil & Grease	15 mg/l (Daily Max)	once/year	grab
			10 mg/l (30-day Avg)	once/year	grab
Airport Deicing 40 CFR 449	Airport Deicing at Primary Airports ^{2,3}	Ammonia as Nitrogen	14.7 mg/L (Daily Max)	once/year	grab
Mineral Mining and Processing 40 CFR 436	Mine dewatering from crushed stone and construction sand & gravel facilities ⁴	pH	6.0-9.0 s.u.	once/year	grab

¹ Coal pile runoff shall not be diluted with other stormwater or other flows in order to meet the TSS limitations. Any untreated overflow from facilities designed, constructed and operated to treat the volume of coal pile runoff which is associated with a 10-year, 24-hour rainfall event shall not be subject to the 50 mg/l Total Suspended Solids limitations.

² Existing and new primary airports with 1,000 or more annual jet departures ("non-propeller aircraft") that discharge wastewater associated with airfield pavement deicing commingled with stormwater must either use non-urea-containing deicers or meet the effluent limit provided.

³ New airport deicing sources must meet the New Source Performance Standards (NSPS) listed in 40 CFR 449.11, including the requirement of 40 CFR 449.11(a)(1) to collect at least 60 percent of available Aircraft Deicing Fluid.

⁴ Only mine dewatering from surface mining activities for crushed stone, and construction sand and gravel, are subject to the ELG-based limits. Mine dewatering from other surface mining activities (as noted in the definition in Part 8.20) are not subject to the ELG-based limits.

3.3.2. The facility must monitor each outfall discharging stormwater from any of the regulated activities described in the above table. The similar outfall monitoring provision as described in Part 3.8.1 is not available for numeric effluent limits monitoring.

3.4. Parameter Benchmark Monitoring. All facilities covered under this general permit are authorized to discharge from all permitted stormwater outfalls. All facilities are required to conduct monitoring and sampling of stormwater at each outfall as specified below. The benchmark concentrations are not effluent limitations; a benchmark exceedance, therefore, is not a permit violation. Benchmark monitoring data are primarily to be used by the facility staff to determine the overall effectiveness of BMPs and control measures in controlling the discharge of pollutants to the environment and to assist the facility in knowing when additional corrective action(s) may be necessary.

Effluent Characteristics	Parameter Benchmark Value		Monitoring Requirements	
	Maximum Concentration		Frequency	Sample Type
pH	<u>Minimum</u> 6.0 S.U.	<u>Maximum</u> 9.0 S.U.	once/year	grab
Total Suspended Solids (TSS)	100 mg/L		once/year	grab

In addition to the above effluent characteristics, the following effluent characteristics, which are based on the Industrial Sub-Sectors as defined in Part 1.5, must also be monitored. (Please note that not all Sub-Sectors listed in Part 1.5 have additional characteristics. If the Industrial Sub-Sector is not listed below, only the above effluent characteristics are required.)

Industrial Sub-Sector	Effluent Characteristics	Parameter Benchmark Value Maximum Concentration	Monitoring Requirements	
			Frequency	Sample Type
A1	COD	120 mg/L	once/year	grab
	O&G	15 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
A2	COD	120 mg/L	once/year	grab
	O&G	15 mg/L	once/year	grab
	Total Arsenic	0.169 mg/L	once/year	grab
	Total Copper	0.0756 mg/L	once/year	grab
A3	COD	120 mg/L	once/year	grab
	O&G	15 mg/L	once/year	grab
A4	COD	120 mg/L	once/year	grab
	O&G	15 mg/L	once/year	grab
A5	COD	120 mg/L	once/year	grab
	O&G	15 mg/L	once/year	grab
B1	COD	120 mg/L	once/year	grab
B2	COD	120 mg/L	once/year	grab
C1	COD	120 mg/L	once/year	grab
	Nitrate plus Nitrite Nitrogen	0.68 mg/L	once/year	grab
	Total Lead	0.519 mg/L	once/year	grab
	Total Iron	1.0 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
	Total Phosphorus	2.0 mg/L	once/year	grab
C2	COD	120 mg/L	once/year	grab
	Total Aluminum	0.75 mg/ L	once/year	grab
	Total Iron	1.0 mg/L	once/year	grab
	Nitrate plus Nitrite Nitrogen	0.68 mg/L	once/year	grab
C3	COD	120 mg/L	once/year	grab
	Nitrate plus Nitrite Nitrogen	0.68 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
C4	COD	120 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
C5	COD	120 mg/L	once/year	grab
D1	O&G	15 mg/L	once/year	grab
D2	O&G	15 mg/L	once/year	grab
E1	Total Aluminum	0.75 mg/L	once/year	grab
E2	Total Iron	1.0 mg/L	once/year	grab
F1	Total Aluminum	0.75 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab

Industrial Sub-Sector	Effluent Characteristics	Parameter Benchmark Value Maximum Concentration	Monitoring Requirements	
			Frequency	Sample Type
F2	Total Aluminum	0.75 mg/L	once/year	grab
	Total Copper	0.0756 mg/L	once/year	grab
	Total Iron	1.0 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
F3	Total Copper	0.0756 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
F4	Total Copper	0.0756 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
G1	Nitrate plus Nitrite Nitrogen	0.68 mg/L	once/year	grab
G2	Total Antimony	0.636 mg/L	once/year	grab
	Total Arsenic	0.169 mg/ L	once/year	grab
	Total Beryllium	0.13 mg/L	once/year	grab
	Total Cadmium	0.0118 mg/L	once/year	grab
	Total Copper	0.0756 mg/L	once/year	grab
	Total Iron	1.0 mg/L	once/year	grab
	Total Lead	0.519 mg/L	once/year	grab
	Total Mercury	0.0024 mg/L	once/year	grab
	Total Nickel	6.43 mg/L	once/year	grab
	Total Selenium	0.020 mg/L	once/year	grab
	Total Silver	0.0107 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
H1	Total Aluminum	0.75 mg/L	once/year	grab
	Total Iron	1.0 mg/L	once/year	grab
I1	COD	120 mg/L	once/year	grab
J1	Nitrate plus Nitrite Nitrogen	0.68 mg/L	once/year	grab
K1	Ammonia	19 mg/L	once/year	grab
	Total Magnesium	0.0636 mg/L	once/year	grab
	Total Arsenic	0.169 mg/L	once/year	grab
	Total Cadmium	0.0118 mg/L	once/year	grab
	Total Cyanide	0.0224 mg/ L	once/year	grab
	Total Lead	0.519 mg/L	once/year	grab
	Total Mercury	0.0024 mg/ L	once/year	grab
	Total Selenium	0.020 mg/L	once/year	grab
L1	COD	120 mg/L	once/year	grab
	COD	120 mg/L	once/year	grab
L2	Total Iron	1.0 mg/L	once/year	grab
	Total Iron	1.0 mg/L	once/year	grab
M1	COD	120 mg/L	once/year	grab
	Total Aluminum	0.75 mg/L	once/year	grab
	Total Iron	1.0 mg/L	once/year	grab
	Total Lead	0.519 mg/L	once/year	grab

Industrial Sub-Sector	Effluent Characteristics	Parameter Benchmark Value Maximum Concentration	Monitoring Requirements	
			Frequency	Sample Type
N1	COD	120 mg/L	once/year	grab
	O&G	15 mg/L	once/year	grab
	Total Aluminum	0.75 mg/L	once/year	grab
	Total Copper	0.0756 mg/L	once/year	grab
	Total Iron	1.0 mg/L	once/year	grab
	Total Lead	0.519 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
N2	COD	120 mg/L	once/year	grab
	O&G	15 mg/L	once/year	grab
O1	Total Iron	1.0 mg/L	once/year	grab
P1	COD	120 mg/L	once/year	grab
	O&G	15 mg/L	once/year	grab
Q1	COD	120 mg/L	once/year	grab
	Total Aluminum	0.75 mg/L	once/year	grab
	Total Iron	1.0 mg/L	once/year	grab
	Total Lead	0.519 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
S1	Ammonia ¹	19 mg/L	once/year	grab
T1	COD	120 mg/L	once/year	grab
U1	COD	120 mg/L	once/year	grab
	O&G	15 mg/L	once/year	grab
U2	Nitrate plus Nitrite Nitrogen	0.68 mg/L	once/year	grab
	COD	120 mg/L	once/year	grab
	O&G	15 mg/L	once/year	grab
U3	COD	120 mg/L	once/year	grab
	O&G	15 mg/L	once/year	grab
Y1	Total Zinc	0.684 mg/L	once/year	grab
AA1	O&G	15 mg/L	once/year	grab
	Total Aluminum	0.75 mg/L	once/year	grab
	Total Iron	1.0 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
	Nitrate plus Nitrite Nitrogen	0.68 mg/L	once/year	grab
AA2	O&G	15 mg/L	once/year	grab
	Total Zinc	0.684 mg/L	once/year	grab
	Nitrate plus Nitrite Nitrogen	0.68 mg/L	once/year	grab
AB1	O&G	15 mg/L	once/year	grab
AD1	COD	120 mg/L	once/year	grab

¹ For airports where a single permittee or a combination of permitted facilities use more than 100,000 gallons of glycol-based deicing chemicals or 100 tons or more of urea on an average annual basis, monitor all parameters in ONLY those outfalls that collect runoff from areas where deicing activities occur. Monitoring is not required for facilities with deicing activities that do not meet the above thresholds.

3.5. Additional Monitoring Required by The Department. The Department may notify the facility of additional discharge monitoring requirements. Any such notice will briefly state the reasons for the monitoring, locations, and parameters to be monitored, frequency and period of monitoring, sample types, and reporting requirements. If a facility discharges to an impaired water with a Department approved or established TMDL, the Department will inform the facility if any additional monitoring requirements or controls are necessary for the discharge to be consistent with the assumptions of any available wasteload allocation in the TMDL.

3.6. Monitoring Period. The monitoring period is from January 1 to December 31 of a calendar year. The facility must monitor at least once within a calendar year.

Monitoring requirements in this permit begin on the effective date of the permit.

3.7. Monitoring Location. All samples must be taken at monitoring points specified in the NOI and SWPPP before the stormwater joins or is influenced by any other waste stream, or waterbody, unless otherwise approved in writing by the Department.

3.8. Sampling Associated with Monitoring Requirements. Sampling shall be conducted to capture stormwater with the greatest exposure to significant sources of pollution. Each stormwater outfall must be sampled and analyzed separately unless an outfall has been determined to be similar in accordance with Part 3.8.1 below.

3.8.1. Similar Outfalls. When a stormwater outfall may be similar to another outfall at the facility, i.e., similar effluents based on a consideration of industrial activity, significant materials and management practices, and activities within the area drained by the outfall, the permittee may sample only the discharge point with the highest concentration of pollutants. The permittee must get approval of the similar outfall designation from the Department prior to monitoring. This provision is not available for discharges subject to the Effluent Limitations Guidelines in Part 1.4.3. The SWPPP must include documentation on how these determinations were made and the description of each point of discharge. The documentation should include the following information:

- 3.8.1.1. Location (latitude and longitude) of each of the similar outfalls;
- 3.8.1.2. Description of the general industrial activities conducted in the drainage area of each outfall;
- 3.8.1.3. Description of the control measures implemented in the drainage area of each outfall;
- 3.8.1.4. Description of the exposed materials located in the drainage area of each outfall that are likely to be significant contributors of pollutants to stormwater discharges; and
- 3.8.1.5. Why the outfalls are expected to discharge similar effluents.

3.8.2. Sampling Procedures. Samples and measurements taken as required shall be representative of the volume and nature of the monitored discharge. Stormwater must be sampled according to requirements below unless the Permittee submits an alternative plan as a modification of coverage and it is approved by the Department. Any approved alternative plan should be included in the SWPPP. If a Permittee is unable to sample during a monitoring period, they must document a justification in the Stormwater Annual Report for that period.

Sampling requirements and instructions are as follows:

3.8.2.1. Grab Sample. A minimum of one grab sample must be taken from each outfall within the first 30 minutes of a discharge resulting from a measurable storm event, as described in Part 3.8.2.2, or within the first 30 minutes of a discharge from holding ponds or basins, as described in Part 3.8.2.3. If it is not possible to collect the sample within the first 30 minutes of a discharge, the sample must be collected as soon as practical, and documentation must be kept with the SWPPP explaining why it was not possible to take samples within the first 30 minutes.

- 3.8.2.2. Measurable Storm Events. All required monitoring must be performed on a storm event that results in an actual discharge from the site (“measurable storm event”) that follows the preceding measurable storm event by at least 72 hours (3 days). The 72-hour (3-day) storm interval does not apply if the facility is able to document that less than a 72-hour (3-day) interval is representative for local storm events during the sampling period. In the case of frozen precipitation, the measurable storm event begins when melting produces a measurable discharge at the facility and ends when measurable discharge ceases at the facility.
- 3.8.2.3. Holding Ponds and Basins. Discharges from stormwater holding ponds and basins may be unrelated to the occurrence of a measurable storm event, as described in Part 3.8.2.2. Samples must be taken within the first 30 minutes of a discharge from holding ponds and basins, regardless of the occurrence of a measurable storm event. Both controlled and uncontrolled discharges are acceptable for sampling.
- 3.8.2.4. Adverse Weather Conditions. Adverse conditions are those that are dangerous or create inaccessibility for personnel, such as local flooding, high winds, electrical storms, or situations that otherwise make sampling impractical, such as drought or extended frozen conditions. When adverse weather conditions prevent the collection of samples according to the relevant monitoring schedule, a substitute sample must be taken during the subsequent qualifying storm event. The facility must document any failure to monitor as indicating the basis for not sampling during the usual reporting period.
- 3.8.2.5. Sampling Method. Analytical methods used to meet the monitoring requirements specified in this permit shall conform to the latest revision of the *Guidelines Establishing Test Procedures for the Analysis of Pollutants* contained in 40 CFR Part 136 or to the latest revision of *Standard Methods for the Examination of Water and Wastewater* (APHA), unless otherwise specified in this permit or approved in writing by the Department provided that such otherwise approved analytical method is the equivalent of that found in the guidance cited in this section or will result in more accurate analytical results or will have a lower detection limit. Note that 40 CFR Part 136 and *Standard Methods for the Examination of Waste and Wastewater* establish the maximum holding times for each parameter which must be met for sampling results to be considered valid. Some parameters have short holding times, such as pH, which should be analyzed immediately to be considered valid.
- 3.8.2.6. Records. For each sampling event, except for sampling from holding ponds and basins, the permittee shall record the date of the storm event sampled, rainfall measurements or estimates (in inches) of the storm event which generated the sampled runoff, and the duration between the storm event sampled and the end of the previous measurable storm event. The above information does not need to be recorded for sampling events for discharges from holding ponds and basins.

3.9. Exceptions to Monitoring Requirements.

- 3.9.1. Inactive and Unstaffed Facilities. Facilities that are inactive and unstaffed during an entire monitoring period will not be required to monitor during the inactive and unstaffed period. To be eligible for an inactive and unstaffed facility waiver, the permittee must certify the site is unstaffed and inactive and the pollutant generating activities are not occurring at the site. The certification must be signed in accordance with signatory requirements of Part 7.8 and kept with the Stormwater Pollution Prevention Plan. Unstaffed is defined as no staff assigned to the industrial or pollutant generating activities. A site may be “unstaffed” even when security personnel are present, provided that pollutant generating activities are not included in their duties.
- 3.9.2. Sampling Waiver. If a parameter is assigned to the facility per Part 3.4, the permittee may request in writing for sampling for that parameter to be waived. Adequate justification or data must be provided to the Department indicating as to why the assigned characteristic is not present at levels that would adversely affect the environment. The Department will review the request and all available information and provide a decision via correspondence.

3.10. Alternatives to Parameter Benchmark Values. The permittee may develop alternatives to the parameter benchmark values, as follows.

3.10.1. The SWPPP must contain a full and complete description of the alternative(s) to the established parameter benchmark values listed in this permit, along with the justification for the selected alternative(s), why the alternative(s) is considered equivalent to the listed parameter benchmark value in protecting water quality (if the permittee is establishing a different value than the established parameter benchmark value), how the alternative(s) will be evaluated to determine equivalency with the established parameter benchmark value, and documenting on an annual basis the permittee's ability to successfully achieve the alternative(s) to the established parameter benchmark values.

3.10.2. The permittee shall submit the section of the SWPPP with the alternative(s) and the rationale to the Department for review. The Department shall review the alternatives and notify the facility of such a decision in writing within 60 days of receipt of the request. The permittee shall use the parameter benchmark values provided in Part 3.4 until written approval by the Department of the alternative benchmark value(s) is received.

3.11. Response to Monitoring Results Above Parameter Benchmark Values. This permit stipulates parameter benchmark value concentrations that may be applicable to a facility's discharge. The benchmark concentrations are not effluent limitations. Therefore, a benchmark exceedance is not a permit violation. Benchmark monitoring data are primarily for the facility to use for determining the overall effectiveness of control measures and to assist in knowing when additional corrective action(s) may be necessary to comply with permit requirements.

3.11.1. Data exceeding benchmarks: If a sampling result for any parameter exceeds the parameter benchmark value, the facility shall investigate the cause or source of the elevated pollutant levels, review the SWPPP, and determine and document a Corrective Action Plan to address the benchmark exceedance. The facility shall commence with the above process within 30 calendar days of the exceedance while immediately taking all readily apparent, reasonable steps necessary to minimize or prevent the discharge of pollutants until a permanent solution is installed and made operational, including cleaning up any contaminated surfaces so that the material will not discharge in subsequent storm events.

The Corrective Action Plan must contain the following: the results of the review; the corrective actions the permittee will take to address the benchmark excursion, including whether a SWPPP modification is necessary; and an implementation schedule with milestone dates and including alternative methods for implementing existing site controls or methods for implementing additional effective site controls, if the site controls have not already been implemented.

The permittee must document the date that corrective actions are initiated and are completed or expected to be completed. This documentation must be included in an annual report and a copy retained onsite with the SWPPP.

3.11.2. Natural background pollutant level: If the permittee determines, and the Department acknowledges, that the exceedances of a benchmark value is attributable solely to the presence of that pollutant in the natural background, the permittee is not required to perform corrective actions or additional benchmark monitoring, provided that the following are met:

3.11.2.1. The concentration of the benchmark monitoring results is less than or equal to the concentration of that pollutant in the natural background (data from previous monitoring may be used if it is less than 5 years old);

3.11.2.2. The permittee documents and maintains with the SWPPP the supporting rationale for concluding that benchmark exceedances are in fact attributable solely to natural background pollutant levels. This must include in the supporting rationale any site specific data previously collected by the facility or others (including literature studies) that describe the levels of natural background pollutants in the stormwater discharge; and

3.11.2.3. The Department must be notified that the benchmark exceedances are attributable solely to natural background pollutant levels. Natural background pollutants include those substances that are naturally occurring in soils or groundwater. Natural background pollutants do not include legacy pollutants from earlier activity on-site or pollutants in run-on from neighboring sources which are not naturally occurring.

Compliance with the requirements of the above conditions does not relieve the permittee of the duty to comply with any other applicable conditions of this permit

PART 4: STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

Each facility covered by this permit shall develop, implement, and comply with a SWPPP. The SWPPP shall be prepared in accordance with commonly accepted engineering practices. The SWPPP shall identify potential sources of pollution which may reasonably be expected to affect the quality of stormwater discharges associated with industrial activity from the facility. Required elements of the SWPPP, implemented in the form of BMPs in lieu of numerical limitations, are considered to be technology-based non-numeric limits based on 40 CFR 122.44(k)(3). The permittee must select, design, install, and implement control measures to comply with the Best Management Practices in Part 3.1, to meet the water quality-based effluent limitations in Part 3.2, and meet the limits contained in applicable Effluent Limitations Guidelines in Part 3.3; the SWPPP is the documentation of this process. The SWPPP must also include any additional BMPs as necessary to comply with state water quality standards and parameter benchmark values. New facilities must have a SWPPP developed and implemented before beginning operation. However, some components of a SWPPP are added over time (e.g. results of dry and wet weather inspections) and cannot be included in the first SWPPP. The Permittee must update the SWPPP as required by permit conditions. Facilities must implement the provisions of the SWPPP required under conditions of this permit.

4.1 Deadlines for SWPPP Preparation and Compliance. Deadlines for SWPPP preparation and compliance for stormwater discharge associated with industrial activity are as follows. Upon a showing of good cause, the Director may establish a later date in writing for preparing and coming into compliance with a SWPPP for a stormwater discharge associated with industrial activity that submits an NOI in accordance with requirements of this permit.

Category	Completion or Updating of SWPPP
New Dischargers	Shall be developed and then submitted to the Department with the Application Package
Existing Dischargers Authorized Under 2014 IGP	Shall be updated by the effective date of this permit. Submittal is not required.

4.2 Contents of SWPPP.

For coverage under this permit, the SWPPP shall include, at a minimum, the following elements:

- Facility information (see Part 4.2.1)
- Stormwater pollution prevention team (see Part 4.2.2);
- Facility description (see Part 4.2.3);
- Description of potential pollutant sources (see Part 4.2.4);
- Measures and controls (see Part 4.2.5);
- Schedules and procedures (see Part 4.2.6);
- Additional requirements (see Part 4.2.7) and
- Signature requirements (see Part 4.2.8).

4.2.1 Facility Information. Each SWPPP shall include the facility name, general permit tracking number, facility physical address, and the facility's SIC and NAICS codes.

4.2.2 Stormwater Pollution Prevention Team. Each SWPPP shall identify a specific individual or position within the facility organization as members of a Stormwater Pollution Prevention Team that are responsible for developing the SWPPP and assisting the facility or plant manager in its implementation, maintenance, and revision. The SWPPP shall clearly identify the responsibilities of each team member. The activities and responsibilities of the team shall address all aspects of the facility's SWPPP.

Please note that common positions (i.e. secretary, operator, etc.) may not be used. A specific position or individual's name must be listed.

4.2.3 Facility Description: The facility description will describe the industrial activities conducted at the site (detailed process description), the general layout of the facility including buildings and storage of raw materials, and the flow of goods and materials through the facility. It should include seasonal variations including peaks in production and any changes in work based on season or weather (e.g. moving work outdoors on dry days). As part of the facility description, a site map should be provided showing the following, as applicable:

- 4.2.3.1 the size of the property in acres;
- 4.2.3.2 the location and extent of significant structures and impervious surfaces;
- 4.2.3.3 directions of stormwater flow (use arrows);
- 4.2.3.4 locations of all existing structural control measures;
- 4.2.3.5 locations of all receiving waters in the immediate vicinity of the facility,
- 4.2.3.6 locations of all stormwater conveyances including ditches, pipes, and swales;
- 4.2.3.7 locations of potential pollutant sources;
- 4.2.3.8 locations of all stormwater monitoring points;
- 4.2.3.9 locations of stormwater inlets and outfalls, with a unique identification code for each outfall, indicating if one or more outfalls is being treated as “substantially identical”, and an approximate outline of the areas draining to each outfall;
- 4.2.3.10 municipal separate storm sewer systems (MS4), where the stormwater discharges to them (if applicable);
- 4.2.3.11 locations and descriptions of all non-stormwater discharges identified;
- 4.2.3.12 locations of the following activities where such activities are exposed to precipitation: fueling stations; vehicle and equipment maintenance or cleaning areas; loading/unloading areas; locations used for the treatment, storage, or disposal of wastes; liquid storage tanks; processing and storage areas; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; transfer areas for substances in bulk; and machinery; and
- 4.2.3.13 locations and sources of run-on to the site from adjacent property that contains significant quantities of pollutants.

4.2.4 Description of potential pollutant sources. The SWPPP must document the areas at the facility where industrial materials or activities are exposed to stormwater and from which allowable non-stormwater discharges are released. For the definition of “industrial materials or activities,” see Part 8.13. For each area identified, the description must include:

- 4.2.4.1 Industrial Activities in the area. A list of the industrial activities exposed to stormwater (e.g., material storage; equipment fueling, maintenance, and cleaning; cutting steel beams).
- 4.2.4.2 Pollutants. A list of the pollutant(s) or pollutant constituents (e.g., crankcase oil, zinc, sulfuric acid, and cleaning solvents) associated with each identified activity. The pollutant list must include 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 date the SWPPP is prepared or amended.
- 4.2.4.3 Spills and Leaks. The SWPPP must document where potential spills and leaks could occur that could contribute pollutants to stormwater discharges, and the corresponding outfall(s) that would be affected by such spills and leaks.

A list of significant spills and significant leaks of toxic or hazardous pollutants that occurred at areas exposed to precipitation or that otherwise drain to a stormwater conveyance at the facility in the three years prior to the date the SWPPP was prepared or amended. This list shall be updated as appropriate during the term of the permit.

- 4.2.4.4 Non-Stormwater Discharges. The SWPPP shall include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, non-contact cooling water, and other illicit discharges to stormwater systems or to waters of the State. The SWPPP shall identify and ensure the implementation of appropriate pollution prevention measures for non-stormwater component(s) of the discharge allowed by Part 1.6.

The SWPPP shall also include a certification that the discharge has been tested or evaluated for the presence of illicit non-stormwater discharges and that all identified unauthorized discharges have been eliminated. The certification shall include the identification of potential significant sources of non-stormwater at the site, a description of the results of any test or evaluation for the presence of non-stormwater discharges, the evaluation criteria and testing method used, the date of any testing or evaluation, and the on-site drainage points that were directly observed during a test. Certifications shall be signed in accordance with Part 7.8 of this permit. Such certification may not be feasible if the facility operating the stormwater discharge associated with industrial activity does not have access to an outfall, manhole or other point of access to the ultimate conduit which receives the discharge. In such cases, the source identification section of the SWPPP shall indicate why the certification required by this part was not feasible, along with the identification of potential significant sources of non-stormwater at the site.

- 4.2.4.5 Salt Storage. The SWPPP must document the location of any storage piles containing salt used for deicing or other commercial or industrial purposes.
- 4.2.4.6 Sampling Data. A summary of existing discharge sampling data describing pollutants in stormwater discharges from the facility, including a summary of sampling data collected during the term of this permit.

4.2.5 Measures and Controls. Each facility covered by this permit shall develop a description of stormwater management controls appropriate for the facility and implement such controls. The appropriateness and priorities of controls in the SWPPP shall reflect identified potential sources of pollutants at the facility. The selection, design, installation, and implementation of these control measures must be in accordance with good engineering practices and manufacturer's specifications. Note that a permittee may deviate from such manufacturer's specifications where justification is provided for such deviation and include documentation of the rationale in the part of the SWPPP that describes the control measures. If control measures are found not to be achieving their intended effect of minimizing pollutant discharges, the control measures must be modified as expeditiously as practicable.

The following should be considered when selecting and designing control measures:

- 4.2.5.1 preventing stormwater from coming into contact with polluting materials is generally more effective, and less costly, than trying to remove pollutants from stormwater;
- 4.2.5.2 using control measures in combination is more effective than using control measures in isolation for minimizing pollutants in stormwater discharges;
- 4.2.5.3 assessing the type and quantity of pollutants, including their potential to impact receiving water quality, is critical to designing effective control measures that will achieve the limits in this permit;
- 4.2.5.4 minimizing impervious areas at the facility and infiltrating runoff onsite (including bioretention cells, green roofs, and pervious pavement, among other approaches) can reduce runoff and improve groundwater recharge and stream base flows in local streams, although care must be taken to avoid ground water contamination;
- 4.2.5.5 attenuating flow using open vegetated swales and natural depressions can reduce in-stream impacts of erosive flows;
- 4.2.5.6 conserving or restoring of riparian buffers will help protect streams from stormwater runoff and improve water quality; and

- 4.2.5.7 using treatment interceptors (e.g., swirl separators and sand filters) may be appropriate in some instances to minimize the discharge of pollutants.

For guidance on potential pollutant sources and controls that should be considered in development of the SWPPP for a specific type of industry, refer to EPA's Multi-Sector General Permit (available online via link at: <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities#msgpdocuments>). The description of stormwater management controls in the SWPPP shall address the following minimum components, including a schedule for implementation:

4.2.6 Schedules and Procedures.

- 4.2.6.1 **Documentation of Control Measures Used to Comply with the Best Management Practices in Part 3.** The following must be documented in the SWPPP:

- 4.2.6.1.1 Good Housekeeping (See Part 3.1.2) – A schedule for regular pickup and disposal of waste materials, along with routine inspections for leaks and conditions of drums, tanks and containers;
- 4.2.6.1.2 Maintenance (See Part 3.1.3) – Preventative maintenance procedures, including regular inspections, testing, maintenance, and repair of all industrial equipment and systems, and control measures, to avoid situations that may result in leaks, spills, and other releases, and any back-up practices in place should a runoff event occur while a control measure is off-line;
- 4.2.6.1.3 Spill Prevention and Response Procedures (See Part 3.1.4) – Procedures for preventing and responding to spills and leaks. The procedures may reference the existence of other plans for Spill Prevention Control and Countermeasure (SPCC) developed for the facility under Section 311 of the CWA or BMP programs otherwise required by an NPDES permit for the facility, provided that a copy of that other plan is kept onsite and made available for review consistent with Part 5.2; and
- 4.2.6.1.4 Employee Training (Part 3.1.8) – A schedule for all types of necessary training.

4.2.6.2 Documentation of Monitoring.

- 4.2.6.2.1 The operator must document in the SWPPP the procedures for conducting the analytical monitoring specified by this permit, where applicable to the facility, including:
 - 4.2.6.2.1.1 Benchmark monitoring (see Part 3.4);
 - 4.2.6.2.1.2 Effluent limitations guidelines monitoring (see Part 3.3); and
 - 4.2.6.2.1.3 Other monitoring as required by the Department.
- 4.2.6.2.2 For each type of monitoring, the SWPPP must document:
 - 4.2.6.2.2.1 Locations where samples are collected, including any determination (and supporting documentation) that two or more outfalls are substantially identical;
 - 4.2.6.2.2.2 Parameters for sampling and the frequency of sampling for each parameter;
 - 4.2.6.2.2.3 Any numeric control values (benchmarks, effluent limitations guidelines, TMDL-related requirements, or other requirements) applicable to discharges from each outfall; and
 - 4.2.6.2.2.4 Procedures (e.g., responsible staff, logistics, laboratory to be used, etc.) for gathering storm event data, as specified in Part 3.8.2.

4.2.6.3 **Documentation of Inspections.** The operator must document in the SWPPP the procedures for performing, as appropriate, the inspections specified by this permit, including:

- Routine facility inspections (see Part 5.1.1);
- Comprehensive site inspections (see Part 5.1.2).

For each type of inspection performed, the SWPPP must identify:

4.2.6.3.1 Person(s) or positions of person(s) responsible for inspection;

4.2.6.3.2 Schedules for conducting inspections; and

4.2.6.3.3 Specific items to be covered by the inspection, including schedules for specific outfalls.

4.2.6.4 **Recordkeeping and Internal Reporting Procedures.** A description of incidents such as spills or other discharges, along with other information describing the quality and quantity of stormwater discharges shall be included in the SWPPP required under this part. Inspections, employee training, and maintenance activities performed on control measures that are used in the implementation of the Best Management Practices or to achieve the effluent limits required by this permit shall be documented and records of such activities shall be incorporated into the SWPPP.

4.2.7 Additional Requirements.

4.2.7.1 **Documentation of Permit Eligibility Related to the 303(d) list (Impaired Water Bodies) and Total Maximum Daily Loads (TMDL).** The SWPPP should include information on whether or not the stormwater discharge from the facility enters a water body that is on the most recently approved 303(d) list, or has an approved TMDL. If the stormwater discharge does enter a water body that is on the most recently approved 303(d) list, or has an approved TMDL, then the SWPPP should address the following items below:

- 4.2.7.1.1 document that the pollutant(s) for which the waterbody is impaired is not present at the facility, and retain documentation of the finding with the SWPPP; or
- 4.2.7.1.2 incorporate into the SWPPP any additional BMPs needed to prevent to the maximum extent practicable exposure of pollutants to stormwater for which the waterbody is impaired and to sufficiently protect water quality. The Department will review this information; or
- 4.2.7.1.3 identification of measures taken by the facility to ensure that its discharge of pollutants from the site is consistent with the assumptions and allocations of the TMDL; and
- 4.2.7.1.4 If a specific numeric wasteload allocation has been established that would apply to the facility's discharges, the operator must incorporate that allocation into its SWPPP and implement necessary steps to meet that allocation and implement necessary steps to meet that allocation. The Department will review this information.

If the Department determines during the review process that the facility will be discharging to a receiving water that is on the most recently approved 303(d) list, or has an approved TMDL, then the Department may require the applicant to include additional BMPs in the SWPPP.

4.2.7.2 **Direct Discharges into an Extraordinary Resource Water (ERW), Natural and Scenic Waterway (NSW), or Ecologically Sensitive Waterbody (ESW).** The SWPPP should include information on whether or not the stormwater discharges from the facility enters a water body that is listed as an ERW, NSW, or ESW. If the stormwater discharge does enter a waterbody that is listed as an ERW, NSW, or ESW, then the SWPPP should address the following items:

- 4.2.7.2.1 document the name of the listed waterbody and the approximate distance between the outfall and the listed waterbody; and

4.2.7.2.2 incorporate into the SWPPP additional BMPs needed to prevent to the maximum extent practicable exposure of pollutants to stormwater that could potentially impact water quality.

If the Department determines during the review process that the facility will be discharging to a receiving water listed as an ERW, NSW, or ESW, then the Department will notify the applicant to include additional Best Management Practices in the SWPPP.

4.2.7.3 **Attainment of Water Quality Standards After Authorization.** The permittee must select, install, implement and maintain BMPs that will minimize or eliminate pollutants in the discharge as necessary to meet applicable water quality standards. At any time after authorization, the Department may determine that the stormwater discharges may cause, have reasonable potential to cause, or contribute to an excursion above any applicable water quality standard. If such a determination is made, the Department will require the permittee to:

- 4.2.7.3.1 Develop a supplemental BMP action plan describing SWPPP modifications to address adequately the identified water quality concerns;
- 4.2.7.3.2 Submit valid and verifiable data and information that are representative of ambient conditions and indicate that the receiving water is attaining water quality standards; or
- 4.2.7.3.3 Cease discharges of pollutants from the facility and submit an individual permit application according to Part 7.22.
- 4.2.7.3.4 All written responses required under this part must include a signed certification consistent with Parts 7.8 and 7.9.

4.2.7.4 **Enhanced/Additional BMPs:** The Permittee shall provide a schedule in the SWPPP for implementation of any additional or enhanced BMPs that are necessary because of a notice from the Department, facility changes, or self-inspection. Complying with this provision does not limit the potential liability for enforcement action where the Permittee has failed to implement required BMPs or where stormwater discharges violate water quality standards. The Department may issue a notice to the Permittee when the SWPPP does not meet one or more of the minimum requirements of the permit or when it is not adequate to ensure compliance with standards. The Permittee shall modify the SWPPP and the BMPs to correct the deficiencies identified in the notice. The Department may require additional BMPs where the Permittee exceeds benchmark values for required sampling. The Permittee shall modify the SWPPP whenever there is a change in design, construction, operation or maintenance of any BMP which cause(s) the SWPPP to be less effective in controlling the pollutants.

4.2.8 Certification. All SWPPP must contain a certification, per Part 7.9 of this permit, and must be signed in accordance with the provisions of 40 CFR 122.22, as adopted by reference in Reg. 6, and Part 7.8 of this permit.

4.3 Other Pollution Control Plans: The Permittee may incorporate by reference applicable portions of plans prepared for other purposes at their facility. Plans or portions of plans incorporated into a SWPPP become enforceable requirements of this permit if the other plans are not regulated through other programs and must meet the availability requirements of the SWPPP.

4.4 SWPPP Availability. The permittee must retain a copy of the current SWPPP required by this permit at the facility, and it must be immediately available to the Department, the operator of an MS4 receiving discharges from the site; and representatives of the USF&WS at the time of an onsite inspection or upon request. The Department may provide access to portions of a facility's SWPPP to a member of the public upon request.

4.5 SWPPP Updates. The permittee must review the SWPPP when any of the following conditions occur or are detected during an inspection, monitoring, or other means:

- 4.5.1 An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit) occurs at the facility
- 4.5.2 A discharge violates a numeric effluent limit
- 4.5.3 Proposed control measures are not stringent enough for the discharge to meet applicable water quality standards
- 4.5.4 A required control measure was never installed, was installed incorrectly, or is not being properly operated or maintained
- 4.5.5 Visual assessments indicate obvious signs of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam)
- 4.5.6 Construction or a change in design, operation, or maintenance at the facility that significantly changes the nature of pollutants discharged in stormwater from your facility, or significantly increases the quantity of pollutants discharged

The permittee's review of the SWPPP is to determine if and where revisions may be needed to eliminate the condition, prevent its reoccurrence, and ensure that effluent limitations are met.

PART 5: EVALUATIONS AND RECORDKEEPING REQUIREMENTS

5.1 Evaluations and Inspections.

5.1.1 Visual Site Inspections. Qualified facility personnel shall be identified to conduct routine facility inspections of all areas of the facility where industrial materials or activities are exposed to stormwater, all stormwater control measures used to comply with this permit, and stormwater outfalls (if accessible) for the presence of floating materials, visible sheen, discoloration, turbidity, odor, etc. Inspections should be performed not less than four (4) times a year.

At least one of the four required inspections must be conducted during a period when a stormwater discharge is occurring.

One inspection shall check for the presence of non-stormwater discharges, such as domestic wastewater, non-contact cooling water, or process wastewater (including leachate), to the stormwater drainage system that are not authorized under this general permit. This shall be done preferably during dry weather, when it is easier to find non-stormwater discharges. If a non-stormwater discharge is discovered, the Permittee shall notify the Department and eliminate the illicit discharge within 30 days.

The permittee must document the findings of each visual inspection performed and maintain this documentation onsite with the SWPPP. At a minimum, documentation of each site inspection must include: date of inspection, personnel making the inspection, major observations, and a summary of actions that need to be taken as a result of the inspection.

Inactive and Unstaffed Sites: The requirement to conduct visual site inspections on a quarterly basis does not apply at a facility that is inactive and unstaffed in accordance with Part 3.9.1, as long as there are no industrial materials or activities exposed to stormwater. Such a facility is only required to conduct an annual comprehensive site inspection in accordance with the requirements of Part 5.1.2.

5.1.2 Comprehensive Site Compliance Evaluation. Qualified personnel shall conduct site compliance evaluations at appropriate intervals specified in the SWPPP, in no case less than once per year.

5.1.2.1 Areas contributing to a stormwater discharge associated with industrial activity shall be visually inspected for evidence of, or the potential for, pollutants entering the drainage system. Measures to reduce pollutant loadings shall be evaluated to determine whether they are adequate and properly implemented in accordance with the terms of the permit and SWPPP, or whether additional control measures are needed. Structural stormwater management measures, sediment and control measures, and other structural pollution prevention measures identified in the plan shall be observed to ensure that they are properly maintained and operated correctly. A visual inspection of equipment needed to implement the spill response shall be conducted.

5.1.2.2 Based on the results of the inspection, the description of potential pollutant sources identified in the SWPPP in accordance with Description of Potential Pollutant Sources of this permit (Part 4.2.4) and pollution prevention measures identified in the SWPPP in accordance with Measures and Controls of this permit (Part 4.2.5) shall be revised as appropriate within 30 days of such inspection. Implementation of any changes to the SWPPP made shall be performed in a timely manner, but in no case more than 90 days from the inspection.

5.1.2.3 A report summarizing the scope of the inspection, personnel making the inspection, date(s) of the inspection, major observations relating to the implementation of the SWPPP, and actions taken shall be made and retained as part of the SWPPP in accordance with Part 5.2.1. The report shall be signed in accordance with Part 7.8 of this permit.

5.1.2.4 The annual comprehensive site compliance evaluation may also be used as one of the routine inspections, as long as all requirements of both types of inspections are have been fulfilled.

5.2 Recordkeeping Requirements.

5.2.1 Records. The Permittee shall retain records of all monitoring information, inspection reports, SWPPP, NOI, and any other documentation of compliance with permit requirements for a period of at least three (3) years from the date of termination. Such information shall include all calibration and maintenance records and all original recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit. This period of retention shall be extended during the course of any unresolved litigation regarding the discharge of pollutants by the Permittee or when requested by the Department. The falsification of information submitted to the Department shall constitute a violation of the terms and conditions of this permit. These records can be kept electronically if all permit recordkeeping requirements are met, such as record retention, availability of records, and signatory requirements. If electronic records are kept, information regarding where the records can be accessed must be included in the facility's SWPPP.

5.2.2 Records Contents. For each measurement or sample taken, the Permittee shall record the following information: (1) the date, exact place, method, and time of sampling or measurement; (2) the individual who performed the sampling or measurement; (3) the dates the analyses were performed; (4) the individual who performed the analyses; (5) the analytical techniques or methods used; and (6) the results of all analyses.

5.2.3 Airport Deicing at Primary Airports – Records. Facilities subject to the Effluent Limitations Guideline for Airport Deicing (40 CFR 449) shall comply with the monitoring, reporting, and recordkeeping requirements in 40 CFR 449.20(a)(1) and (2).

5.2.4 Stormwater Annual Report (SWAR) Requirements. The SWAR covers the previous 12 month January – December calendar year and is to be incorporated as part of the SWPPP no later than the 31st day of January of the following year (i.e., January 31, 2020 for year 2019). The first SWAR may include less than 12 months of information. The SWAR form is available on the Department's website: www.adeq.state.ar.us.

The Department's SWAR form must be used and the following information must be included in the SWAR:

- 5.2.4.1 Monitoring results obtained from stormwater sampling, unless waived;
- 5.2.4.2 Justification for why samples were not taken, if applicable (explanation of why there was no discharge, adverse weather conditions, etc.);
- 5.2.4.3 Significant findings from the comprehensive site evaluation and site inspections (including visual monitoring of outfalls);
- 5.2.4.4 A summary of any corrective action plans written under Part 3.11.1, including the status of any corrective actions not yet completed at the time of submittal of the SWAR; and
- 5.2.4.5 The SWAR must be signed in accordance with Part 7.8.

The SWAR is not required to be submitted to the Department, except upon request. If requested, the SWAR must be received by the Department within five (5) business days of the request, unless another deadline is specified.

5.2.5 Additional Monitoring by the Permittee. If the permittee monitors any pollutant at any outfall more frequently than required by this permit using test procedures specified in this permit, then the results of this monitoring shall be included in the permittee's SWAR.

PART 6: TOXICITY TESTING

6.1 Toxicity Testing Requirements. The determination as to which facilities will be required to perform toxicity testing will be made on a case-by-case basis based on available information and monitoring data. The permittee will be provided written notice by the Department if toxicity testing is required.

6.2 Acute Whole Effluent Toxicity Limits

LETHAL LIMIT 100%

6.2.1 Scope, Frequency and Methodology

6.2.1.1 The provisions of this section are applicable to discharges authorized in Parts 1.1 and 6.1 above for whole effluent toxicity.

6.2.1.2 The permittee shall test the effluent for toxicity in accordance with the provisions in this section. This testing will determine if an effluent sample adversely affects the survival of the test organisms. The permittee shall submit the results of these tests to the Department for review to the following email address: Water-Permit-Application@adeq.state.ar.us.

6.2.1.3 The permittee shall implement all toxicity tests utilizing the test organisms, procedures, and quality assurance requirements specified in this section of the permit and in accordance with the EPA manual, "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms", EPA-821-R-02-012, or the latest update thereof. The permittee shall repeat a test, including the control and 100% effluent dilution, if the procedures and quality assurance requirements defined in the test methods or in this permit are not satisfied. A repeat test shall be conducted within the required reporting period of any test determined to be invalid.

6.2.1.4 Test Acceptance. The permittee shall repeat a test, including the control and 100% effluent, if the procedures and quality assurance requirements defined in the test methods or in this permit are not satisfied, including the following additional criteria:

6.2.1.4.1 Each toxicity test control (0% effluent) must have a survival equal to or greater than 90%.

6.2.1.4.2 The percent coefficient of variation between replicates shall be 40% or less in the control (0% effluent) for: Daphnia pulex survival test; and Fathead minnow survival test.

6.2.1.4.3 The percent coefficient of variation between replicates shall be 40% or less in the critical dilution (100% effluent), unless significant lethal effects are exhibited for: Daphnia pulex survival test; and Fathead minnow survival test.

6.2.1.4.4 If a test passes, yet the percent coefficient of variation between replicates is greater than 40% in the control (0% effluent) and/or in the critical dilution (100% effluent) for: the survival in the Daphnia pulex survival test or the survival endpoint of the Fathead minnow test, the test is determined to be invalid. A repeat test shall be conducted within the required reporting period of any test determined to be invalid.

6.2.1.4.5 If a test fails, test failure may not be construed or reported as invalid due to a coefficient of variation value of greater than 40%.

6.2.1.5 Daphnia pulex acute static renewal 48-hour definitive toxicity test using EPA-821-R-02-012, or the latest update thereof. A minimum of five (5) replicates with eight (8) organisms per replicate must be used in the control and in each effluent dilution of this test.

Pimephales promelas (Fathead minnow) acute static renewal 48-hour definitive toxicity test using EPA-821-R-02-012, or the latest update thereof. A minimum of five (5) replicates with eight (8) organisms per replicate must be used in the control and in each effluent dilution of this test.

The permittee shall conduct the Fathead minnow and the Daphnia pulex toxicity tests at a frequency of once per year.

Permittees that are required to conduct Whole Effluent Toxicity testing must continue to monitor for acute Whole Effluent Toxicity unless testing is no longer required per the provisions of Part 6.2.3.

6.2.1.6 The permittee shall use 100% effluent dilution concentration in addition to a control (0% effluent) in each toxicity test. The low-flow effluent concentration (critical dilution) is defined as 100% effluent.

6.2.1.7 The conditions of this item are effective beginning with the effective date of the WET limit. When the effluent fails the survival endpoint at the critical dilution, the permittee shall be considered in violation of this permit limit

6.2.2 Required Toxicity Testing Conditions

6.2.2.1 Samples: The permittee shall collect grab samples for test initiation and 24-hour renewal in accordance with Section 8 of EPA-821-R-02-012. The permittee must have initiated the toxicity test within 36 hours after the collection of the grab sample. Samples shall be chilled to between 0 and 6 degrees Centigrade during collection, shipping, and/or storage.

6.2.2.2 Dilution Water: The synthetic dilution water (control) shall have a pH, hardness and alkalinity similar to that of the receiving water, provided the magnitude of these parameters will not cause toxicity in the synthetic dilution water. Section 7 of EPA-821-R-02-012 provides additional instructions.

6.2.2.3 Statistical Interpretation: For the Fathead minnow and the Daphnia pulex survival tests, the statistical analyses used shall be in accordance with the methods for determining Pass/Fail for Single-Concentration Tests as described in the EPA manual, "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms", EPA-821-R-02-012, or the most recent update thereof.

6.2.3 Persistent Lethality

If acute Whole Effluent Toxicity (statistically significant difference between the 100% effluent and the control) is detected in stormwater discharges in tests required to be conducted, the permittee shall review the SWPPP and make appropriate modifications to assist in identifying the source(s) of toxicity and to reduce or eliminate the toxicity of their stormwater discharges. A summary of the review and the resulting modifications shall be documented in the plan.

6.2.4 Reporting

6.2.4.1 The permittee shall prepare a full report of the results of all tests conducted pursuant to this Part in accordance with the Report Preparation Section of, "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms", EPA-821-R-02-012, for every valid or invalid toxicity test initiated, whether carried to completion or not. The permittee shall submit full reports, to the Department.

6.2.4.2 All test results shall be reported on "Summary Reports" (provided by the Department) and submitted to the following email address: Water-Permit-Application@adeq.state.ar.us

- 6.2.4.3 The facility may request in writing for testing for acute Whole Effluent Toxicity to be deleted as a requirement after passing two (2) consecutive annual testing periods. The Department will provide a decision in writing. If a facility has fails two (2) testing periods (annually), quarterly testing for Acute Whole Effluent Toxicity will be required until the facility has passed two consecutive quarterly tests. After two consecutive quarterly periods in which tests on both toxicity test species have passed, the facility shall resume annual testing. If, during the first year of quarterly testing a facility fails all four quarterly testing periods for Acute Whole Effluent Toxicity, the facility will be required to increase monitoring or improve BMPs and obtain an Individual permit.

PART 7: STANDARD PERMIT CONDITIONS

- 7.1 Duty to Comply.** The operator must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Water Act and the Arkansas Water and Air Pollution Control Act and is grounds for: enforcement action; permit termination, revocation and re-issuance, or modification; requiring a permittee to apply for an individual NPDES permit; or denial of a permit renewal application.
- 7.2 Penalties for Violations of Permit Conditions.** The Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 et seq.) provides that any person who violates any provisions of a permit issued under the Act shall be guilty of a misdemeanor and upon conviction thereof shall be subject to imprisonment for not more than one (1) year, or a criminal penalty of not more than twenty five thousand dollars (\$25,000) or by both such fine and imprisonment for each day of such violation. Any person who violates any provision of a permit issued under the Act may also be subject to civil penalty in such amount as the court shall find appropriate, not to exceed ten thousand dollars (\$10,000) for each day of such violation. The fact that any such violation may constitute a misdemeanor shall not be a bar to the maintenance of such civil action.
- 7.3 Continuance of the Expired General Permit.** An expired general permit, including no exposure certification, continues in force and effect until a new general permit is issued. If this permit is not re-issued or replaced prior to the expiration date, it will be administratively continued in accordance with the Administrative Procedure Act and remain in force and effect. If permit coverage was granted prior to the expiration date, permit coverage is automatically continued until the earliest of:
- 7.3.1** Reissuance or replacement of this permit, at which time the operator must comply with the conditions of the new permit to maintain authorization to discharge and, the operator is required to notify the Department of his/her intent to be covered under this permit by the effective date of the renewal permit; or
 - 7.3.2** Submittal of a Notice of Termination; or
 - 7.3.3** Issuance of an individual permit for the facility's discharges; or
 - 7.3.4** A formal permit decision by the Department to not re-issue this general permit, at which time the facility must seek coverage under an individual NPDES permit or other alternate permits.
- 7.4 Need to Halt or Reduce Activity Not a Defense.** It shall not be a defense for an operator in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- 7.5 Duty to Mitigate.** The operator shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has reasonable likelihood of adversely affecting human health or the environment.
- 7.6 Duty to Provide Information.** The operator shall furnish to the Director, an authorized representative of the Director, the EPA, a State or local agency reviewing sediment and erosion plans, grading plans, or stormwater management plans, or in the case of a stormwater discharge associated with industrial activity which discharges through a municipal separate storm sewer system with an NPDES permit, to the municipal operator of the system, within a reasonable time, any information which is requested to determine compliance with this permit.
- 7.7 Other Information.** When the operator becomes aware that he or she failed to submit any relevant facts or submitted incorrect information in the Notice of Intent or in any other report to the Director, he or she shall promptly submit such facts or information.

7.8 Signatory Requirements. All Notices of Intent, reports, or information submitted to the Director shall be signed and certified as follows:

7.8.1 For a corporation: by a responsible corporate officer. For purposes of this section, a responsible corporate officer means:

7.8.1.1 A president, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or

7.8.1.2 The manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to ensure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

7.8.2 For a partnership or sole proprietorship: by a general partner or the proprietor, respectively;

7.8.3 For a municipality, State, Federal or other public agency: By either a principal executive or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes:

7.8.3.1 The chief executive officer of the agency; or

7.8.3.2 A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency.

7.8.4 All reports required by the permit and other information requested by the Director shall be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

7.8.4.1 The authorization is made in writing by a person described above and submitted to the Director;

7.8.4.2 The authorization specifies either an individual or a person having responsibility for the overall operation of the regulated facility or activity, such as the position of plant manager, operator of a well or a well field, superintendent, or position of equivalent responsibility, or position of equivalent responsibility for environmental matters for the company. (A duly authorized representative may thus be either a named individual or any individual occupying a named position); and

7.8.4.3 Changes to authorization. If an authorization under this Part is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the above requirements must be submitted to the Director prior to or together with any reports, information, or applications to be signed by an authorized representative.

7.8.5 If required by the operator of a small, medium, or large MS4, the permittee shall provide all submissions signed and certified in accordance with the requirements of this section (7.8).

7.9 Certification. Any person signing a document under this section shall make the following certification:

“I 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 fine and imprisonment for knowing violations.”

7.10 Penalties for Falsification of Reports. The Arkansas Water and Air Pollution Control Act provides that any person who knowingly makes any false statement, representation, or certification in any application, record, report, plan or other document filed or required to be maintained under this permit shall be subject to civil penalties or criminal penalties under the authority of the Arkansas Water and Air Pollution Control Act (Ark. Code Ann. § 8-4-101 et seq.).

7.11 Penalties for Tampering. The Arkansas Water and Air Pollution Control act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under the Act shall be guilty of a misdemeanor and upon conviction thereof shall be subject to imprisonment for not more than one (1) year or a fine of not more than twenty five thousand dollars (\$25,000) or by both such fine and imprisonment.

7.12 Oil and Hazardous Substance Liability. Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the operator from any responsibilities, liabilities, or penalties to which the operator is or may be subject under Section 311 of the Clean Water Act or Section 106 of CERCLA.

7.13 Local, State and Federal Laws. Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable local, state, or federal law or regulation.

7.14 Property Rights. The issuance of this permit does not convey any property rights of any sort or any exclusive privileges, nor does it authorize any injury to private property, any invasion of personal rights, or any infringement of Federal, State, or local laws or regulations.

7.15 Severability. The provisions of this permit are severable. If any provisions of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provisions to other circumstances and the remainder of this permit shall not be affected thereby.

7.16 Transfers. This permit is not transferable to any person except after notice to the Director. A transfer form must be submitted to the Department as required by this permit.

7.17 Proper Operation and Maintenance. The operator shall at all times:

7.17.1 Properly operate and maintain all controls (and related appurtenances) which are installed or used by the operator to achieve compliance with the conditions of this permit. This provision requires the operation of backup or auxiliary facilities or similar systems which are installed by an operator only when the operation is necessary to achieve compliance with the conditions of the permit.

7.17.2 Provide an adequate operating staff which is duly qualified to carry out operation, inspection, maintenance, and testing functions required to ensure compliance with the conditions of this permit.

7.18 Inspection and Entry. The operator shall allow the Director, the EPA, or an authorized representative, or, in the case of a facility which discharges to a municipal separate storm sewer, an authorized representative of the municipal operator of the separate sewer system receiving the discharge, upon the presentation of credentials and other documents as may be required by law, to:

7.18.1 Enter upon the operator's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

7.18.2 Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

7.18.3 Inspect at reasonable times any facilities or equipment (including monitoring and control equipment).

7.19 Permit Actions. This permit coverage may be modified, revoked and reissued, or terminated for cause including, but not limited to, the following:

7.19.1 Violation of any terms or conditions of this permit;

7.19.2 Obtaining this permit by misrepresentation or failure to fully disclose all relevant facts;

7.19.3 A change in any conditions that requires either a temporary or permanent reduction or elimination of the authorized discharge;

7.19.4 A determination that the permitted activity endangers human health or the environment and can only be regulated to acceptable levels by permit modification or termination; or

7.19.5 Failure of the operator to comply with the provisions of Reg. 9 (Fee Regulation). Failure to promptly remit all required fees shall be grounds for the Director to initiate action to terminate this permit under the provisions of 40 CFR 122.64 and 124.5(d), as adopted by reference in Reg. 6, and the provisions of Reg. 8.

7.20 Re-Opener Clause. In accordance with 40 CFR Part 122.62(a)(2), the permit may be modified, or alternatively, revoked and reissued, if new information is received that was not available at the time of permit issuance that would have justified the application of different permit conditions at the time of permit issuance.

7.21 Local Requirements. All dischargers must comply with the lawful requirements of municipalities, counties, drainage districts, and other local agencies regarding any discharges of stormwater to storm drain systems, or other water sources under their jurisdiction, including applicable requirements in municipal stormwater management programs developed to comply with the ADEQ permits. Dischargers must comply with local stormwater management requirements, policies, or guidelines including erosion and sediment control.

7.22 Requiring an Individual NPDES Permit or an Alternative General Permit.

7.22.1 At the discretion of the Director, he/she may require any operator covered under this general permit to apply for and obtain an individual NPDES permit for reasons that include but are not limited to the following:

7.22.1.1 The discharger is a significant contributor of pollution;

7.22.1.2 The discharger is not in compliance with the conditions of the general permit;

7.22.1.3 Conditions or standards have changed so that the discharger no longer qualifies for a general permit;

7.22.1.4 Discharges into 303(d) listed stream segments is prohibited if the impairment was caused by any of the pollutants listed in the permit; and

7.22.1.5 If the total maximum daily load (TMDL) requirement is more stringent than this permit then permittee shall apply for an individual permit.

7.22.2 The operator must be notified in writing that an application for an individual permit is required. When an individual NPDES permit is issued to an owner or operator otherwise covered under this general permit, the applicability of the general permit to that owner or operator automatically terminates upon the effective date of the individual NPDES permit.

7.22.3 Any operator covered by this General Permit may request to be excluded from the coverage by applying for an individual NPDES permit.

7.23 **Non-compliance Notification.** In the event the Permittee is unable to comply with any of the terms and conditions of this permit that could result in the discharge of pollutants in a significant amount, the Permittee shall:

7.23.1 Take immediate action to minimize potential contamination or otherwise stop the noncompliance and correct the problem;

7.23.2 Immediately notify the Department of the failure to comply; and

7.23.3 Submit a detailed written report to the Department within thirty (30) days unless the Department requests an earlier submission.

The report shall contain a description of the noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. Compliance with these requirements does not relieve the Permittee from responsibility to maintain continuous compliance with the terms and conditions of this permit or the resulting liability for failure to comply.

PART 8: DEFINITIONS

- 8.1 "**ADEQ**" or "**the Department**" is referencing the Arkansas Department of Environmental Quality. The Department is the governing authority for the National Pollutant Discharge Elimination System program in the state of Arkansas.
- 8.2 "**Arkansas Pollution Control and Ecology Commission**" shall be referred to as APC&EC throughout this permit.
- 8.3 "**Best Management Practices (BMPs)**" means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of Waters of the State. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.
- 8.4 "**Coal Pile Runoff**" means the rainfall runoff from or through any coal storage area.
- 8.5 "**Contaminated**" means the presence of or entry into the MS4, Waters of the State, or Waters of the United States of any substance which may be harmful to the public health or the quality of the water.
- 8.6 "**Control Measure**" as used in this permit, refers to any Best Management Practice or other method used to prevent or reduce the discharge of pollutants to Waters of the State.
- 8.7 "**CWA**" means the Clean Water Act or the Federal Water Pollution Control Act.
- 8.8 "**Director**" means the Director, Arkansas Department of Environmental Quality, or a designated representative.
- 8.9 "**Discharge**" when used without qualification means the "discharge of a pollutant".
- 8.10 "**Eligible**" qualified for authorization to discharge stormwater under this general permit.
- 8.11 "**Excavation dewatering**" means removal of **uncontaminated** (e.g. groundwater) that accumulates in an excavation that is being performed for the purpose of construction (e.g., building foundations or installation of equipment below grade). "Excavation dewatering" may include the removal of accumulated stormwater or groundwater. See also, the definition of "Mine dewatering" in Part 8.20.
- 8.12 "**Impaired Water**" a water body listed in the current, approved Arkansas 303(d) list.
- 8.13 "**Industrial materials or activities**" include, but are not limited to: material handling equipment or activities; industrial machinery; raw materials; industrial production and processes; and intermediate products, by-products, final products, and waste products.
- 8.14 "**Harmful quantity**" means the amount of any substance that will cause pollution of waters in the State, waters of the United States, or that will cause lethal or sub-lethal adverse effects on representative, sensitive aquatic monitoring organisms, upon their exposure to samples of any discharge into waters in the State, Waters of the United States, or the MS4.
- 8.15 "**Land Application Unit**" means an area where wastes are applied onto or incorporated into the soil surface (excluding manure spreading operations) for treatment or disposal.
- 8.16 "**Landfill**" means an area of land or an excavation in which wastes are placed for permanent disposal, and which is not a land application unit, surface impoundment, injection well, or waste pile.

- 8.17 "**Large and Medium Municipal Separate Storm Sewer System**" means all municipal separate storm sewer systems that are either:
- a. Located in an incorporated place with a population of 100,000 or more as determined by the latest Decennial Census by the Bureau of the Census (Appendix G of 40 CFR Part 122.26); or
 - b. Located in the counties listed in Appendix H of 40 CFR 122.26, except municipal separate storm sewers that are located in the incorporated places, townships or towns within such counties; or
 - c. Owned or operated by a municipality other than those described in paragraph (b)(4) (i) or (ii) of 40 CFR 122.26 and that are designated by the Director as part of the large or medium municipal separate storm sewer system due to the interrelationship between the discharges of the designated storm sewer and the discharges from municipal separate storm sewers described under paragraph (b)(4)(i) or (ii) of 40 CFR 122.26.
- 8.18 "**Material handling activities**" include, but are not limited to: the storage, loading and unloading, transportation, disposal, or conveyance of any raw material, intermediate product, final product or waste product.
- 8.19 "**Minimize**" means to reduce or eliminate to the extent achievable using control measures (including Best Management Practices) that are technologically available and economically practicable and achievable in light of best industry practice.
- 8.20 "**Mine dewatering**" means removal of water from areas where surface mining or quarrying activities are being conducted. These mining activities include: a) the surface extraction of clay, bauxite, sand, gravel, soil, shale or other materials for commercial purposes; b) removing the materials over a coal seam, before recovering the coal; c) removing of stone from an open pit or quarry.
- 8.21 "**NOI**" means Notice of Intent to be covered by this permit.
- 8.22 "**NOT**" means Notice of Termination.
- 8.23 "**Operator**" for the purpose of this permit and in the context of stormwater associated with industrial activity, means any person (an individual, association, partnership, corporation, municipality, state or federal agency) who has the primary management and ultimate decision-making responsibility over the operation of a facility or activity. The operator is responsible for ensuring compliance with all applicable environmental regulations and conditions.
- 8.24 "**Outfall**" means a point source where stormwater leaves the site.
- 8.25 "**Permittee**" for the purpose of this permit is any entity which has obtained coverage under the Industrial Stormwater General Permit.
- 8.26 "**Physically Interconnected**" means that one municipal separate storm sewer system is connected to a second municipal separate storm sewer system in such a way that it allows for direct discharges into the second system.
- 8.27 "**Point Source**" means any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

8.28 "Small Municipal Separate Storm Sewer System" means all municipal separate storm sewer systems that are either:

- a. Owned or operated by the United States, a State, city, town, borough, county, parish, district, association, or other public body (created by or pursuant to State law) having jurisdiction over disposal of sewage, industrial wastes, stormwater, or other wastes, including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the CWA that discharges to Waters of the United States.
- b. Not defined as "large" or "medium" municipal separate storm sewer systems pursuant to paragraphs (b)(4) and (b)(7) 40 CFR 122.26, or designated under paragraph (a)(1)(v) of 40 CFR 122.26.
- c. This term includes systems similar to separate storm sewer systems in municipalities, such as systems at military bases, large hospital or prison complexes, and highways and other thoroughfares. The term does not include separate storm sewers in very discrete areas, such as individual buildings.

8.29 "Runoff Coefficient" means the fraction of total rainfall that will appear at the conveyance as runoff.

8.30 "Significant Materials" includes, but is not limited to: raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under Section 101(14) of CERCLA; any chemical the facility is required to report pursuant to Section 313 of Title III of SARA; fertilizers; pesticides; and waste products such as ashes, slag and sludge that have the potential to be released with stormwater discharges.

8.31 "Significant Spills" includes, but is not limited to: releases of oil or hazardous substances in excess of reportable quantities under Section 311 of the Clean Water Act (see 40 CFR 110.10 and 40 CFR 117.21) or Section 102 of CERCLA (see 40 CFR 302.4).

8.32 "Stormwater" means stormwater runoff, snow melt runoff, and surface runoff and drainage.

8.33 "Stormwater Associated with Industrial Activity" means the discharge from any conveyance which is used for collecting and conveying stormwater and which is directly related to manufacturing, processing or raw materials storage areas at an industrial plant. The term does not include discharges from facilities or activities excluded from the NPDES program. For the categories of industries identified in subparagraphs (i) through (xi) of this definition, the term includes, but is not limited to, stormwater discharges from industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; refuse sites; sites used for the application or disposal of process waste waters (as defined at 40 CFR 401); sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials, and intermediate and finished products; and areas where industrial activity has taken place in the past and significant materials remain and are exposed to stormwater. For the purposes of this paragraph, material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, finished product, by-product, or waste product. The term excludes areas located on plant lands separate from the plant's industrial activities, such as office buildings and accompanying parking lots as long as the drainage from the excluded areas is not mixed with stormwater drained from the above described, regulated areas. Industrial facilities (including industrial facilities that are Federally, State or municipally owned or operated that meet the description of the facilities listed in paragraphs (i) - (xi)) include those facilities designated under 122.26(a)(1)(v). The following categories of facilities are considered to be engaging in "industrial activity" for purposes of this subsection:

- (i) Facilities subject to stormwater effluent limitations guidelines, new source performance standards, or toxic pollutant effluent standards under 40 CFR Subchapter N (except facilities with toxic pollutant effluent standards which are exempted under category (xi) of this paragraph; “Note that the phrase ‘toxic pollutant effluent standards’ refers to standards codified at 40 CFR 129 which applies only to manufacturers of 6 specific pesticide products that are defined as toxic pollutants. The phrase does not apply to facilities subject to effluent limitation guidelines for toxics under 40 CFR Subchapter N.”
- (ii) Facilities classified as Standard Industrial Classifications 24 (except 2434), 26 (except 265 and 267), 28 (except 283), 29, 311, 32 (except 323), 33, 3441, 373;
- (iii) Facilities classified as Standard Industrial Classifications 10 through 14 (mineral industry) including active or inactive mining operations (except for areas of coal mining operations meeting the definition of a reclamation area under 40 CFR 434.11(l)) and oil and gas exploration, production, processing, or treatment operations, or transmission facilities that discharge stormwater contaminated by contact with or that has come into contact with, any overburden, raw material, intermediate products, finished products, by-products, or waste products located on the site of such operations; inactive mining operations are mining sites that are not being actively mined, but which have an identifiable Operator;
- (iv) Hazardous waste treatment, storage, or disposal facilities, including those that are operating under interim status or a permit under Subtitle C of RCRA;
- (v) Landfills, land application sites, and open dumps that have received any industrial wastes (waste that is received from any of the facilities described under this subsection) including those that are subject to Subtitle D of RCRA;
- (vi) Facilities involved in the recycling of materials, including junkyards, battery reclaimers, salvage yards, and automobile junkyards, including but not limited to those classified as Standard Industrial Classification 5015 and 5093;
- (vii) Steam electric power generating facilities, including coal handling sites;
- (viii) Transportation facilities classified as Standard Industrial Classifications 40, 41, 42 (except 4221-4225), 43, 44, 45 and 5171 which have vehicle maintenance shops, equipment cleaning operations, or airport deicing operations. Only those portions of the facility that are either involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning operations, airport deicing operations, or which are otherwise identified under paragraphs (i) -(vii) or (ix) - (xi) of this subsection are associated with industrial activity;
- (ix) Treatment works treating domestic sewage or any other sewage sludge or wastewater treatment device or system, used in the storage, treatment, recycling, and reclamation of municipal or domestic sewage, including land dedicated to the disposal of sewage sludge that are located within the confines of the facility, with a design flow of 1.0 MGD or more, or required to have an approved pretreatment program under 40 CFR 403. Not included are farm lands, domestic gardens, or lands used for sludge management where sludge is beneficially reused and which are not physically located in the confines of the facility, or areas that are in compliance with 40 CFR 405.
- (x) Construction activity including clearing, grading and excavation, except operations that result in the disturbance of less than five acres of total land area. Construction activity also includes the disturbance of less than five acres of total land area that is a part of a larger common plan of development or sale if the larger common plan will ultimately disturb five acres or more;

NOTE: See exclusion under Part 1.8.2.

- (xi) Facilities under Standard Industrial Classifications 20, 21, 22, 23, 2434, 25, 265, 267, 27, 283, 285, 30, 31 (except 311), 323, 34 (except 3441), 35, 36, 37 (except 373), 38, 39, 4221-4225.

- 8.34 "Stormwater Pollution Prevention Plan (SWPPP or SWP3)"** a plan that includes site map(s), an identification of facility activities that could cause pollutants in the stormwater, and a description of measures or practices to control these pollutants (BMPs).
- 8.35 "Total Maximum Daily Load" or "TMDL"** the sum of the individual wasteload allocations (WLAs) for point sources and load allocations (LAs) for non-point sources and natural background. If receiving water has only one point source discharger, the TMDL is the sum of that point source WLA plus the LAs for any non-point sources of pollution and natural background sources, tributaries, or adjacent segments. TMDLs can be expressed in terms of either mass per time, toxicity, or other appropriate measure.
- 8.36 "Uncontaminated"** means that the water will not exceed the water quality standards as set forth in Reg. 2; also not containing a harmful quantity of any substance.
- 8.37 "Urbanized Area"** means the areas of urban population density delineated by the Bureau of the Census for statistical purposes and generally consisting of the land area comprising one or more central place(s) and the adjacent densely settled surrounding area that together have a residential population of at least 50,000 and an overall population density of at least 1,000 people per square mile as determined by the latest Decennial Census by the Bureau of Census.
- 8.38 "Waste Pile"** means any non-containerized accumulation of solid, non-flowing waste that is used for treatment or storage.
- 8.39 "10-year, 24-hour Precipitation Event"** means the maximum 24-hour precipitation event with a probable reoccurrence interval of once in 10 years. This information is available in "Weather Bureau Technical Paper No. 40", May 1961 and "NOAA Atlas 2", 1973 for the 11 Western States, and may be obtained from the National Climatic Center of the Environmental Data Service, National Oceanic and Atmospheric Administration, U. S. Department of Commerce.

Appendix 3

Anthony Timberlands-Malvern
March 14, 2023,
Request for Information (RFI)
Response

Esparza, David

From: Wilson Anthony <WAnthony@anthonytimberlands.com>
Sent: Thursday, March 16, 2023 11:12 AM
To: Esparza, David
Subject: Anthony Timberlands-Malvern (ARR00B476) Part 1
Attachments: Storm Water Pollution Prevention Plan - March 2023.pdf; Quarterly and Annual Stormwater Inspections.pdf; 2021 and 2022 SWAR.pdf; Malvern Exhibit A.pdf; Malvern Site Map with Total Site Area.pdf; Malvern - Exhibit A Explanation.docx

Mr. Esparza,

I have attached documents for your review. Please see my comments below in red.

I apologize for having to send this in a few parts, but some of the file sizes were a bit large.

Wilson Anthony
Director – Regulatory Compliance
Anthony Timberlands, Inc
(870) 313-4114

From: Esparza, David <esparza.david@epa.gov>
Sent: Tuesday, March 14, 2023 11:50 AM
To: Wilson Anthony <WAnthony@anthonytimberlands.com>; jjones_ati@yahoo.com
Cc: Jones, Curry <jones.curry@epa.gov>; Bernier, Roberto <bernier.roberto@epa.gov>; Sherwood, Chelsey <Sherwood.Chelsey@epa.gov>; Johnson, Carol <johnson.carol@epa.gov>; Esparza, David <esparza.david@epa.gov>
Subject: Anthony Timberlands-Malvern (ARR00B476)

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Mr. Anthony:

As I discussed, this is my follow-up to our on-site discussion on March 8, 2023. To reiterate my understanding, I was informed you would provide copies of the information as requested. Additional information might be requested after my review of the received information. The specific request for information (RFI) will be delineated below. Therefore, please forward by email the requested information as soon as possible, but no later than close of business March 21, 2023.

- A complete electronic copy of your current Stormwater Pollution Prevention Plan (SWPPP), inclusive of all on-site inspection reports for the previous two (2) years. **See attached “Stormwater Pollution Prevention Plan – March 2023” and “Quarterly and Annual Stormwater Inspections”**
- A legible electronic copy of your “Exhibit A” (Redline Plan Sheet #D502001E). – **See “Malvern Exhibit A” and “Malvern – Exhibit A Explanation”**
- A current copy of the facility Site Map delineating the total foot-print area, locations/volumes of the on-site fuel storage tanks, and outfalls. – **See “Malvern Site Map with Total Site Area.” When combined with “Malvern Exhibit A,” I believe that the total area, locations/volumes of petroleum storage tanks, and outfalls are all covered.**

- An electronic copy of your Spill Prevention, Control, and Countermeasure (SPCC) pertaining to your on-site fuel storage. – **The facility is currently in the process of installing additional secondary containments in a couple of areas. The facility hopes to have these complete along with our SPCC within the next 60 days.**
- Electronic copies of your waste manifests for your on-site oil/water separator regarding the transport/disposal for the previous two (2) years – **I have attached these in a few separate emails due to the file size. We have had a large number of waste manifests. Only a small amount is related to the oil/water separator, but that material is not differentiated in the manifests since it has the same profile as our other disposals.**
- Electronic copies of your Stormwater Annual Report (SWAR) for the previous two (2) years, inclusive appurtenant analytical analysis - **See attached “2021 and 2022 SWAR”**
- Electronic copies of your calibration and maintenance records for your continuous monitoring instrumentation, inclusive of serial numbers (S/N) – **The facility does not have any continuous monitoring instrumentation.**

Please let me know if you have any questions.

David A. Esparza, P.E.
 Environmental Engineer
 U.S. Environmental Protection Agency
 Water Enforcement Branch-Municipal/Industrial Section
 Mail Code: 6-ECDWM
 1201 Elm Street, Suite 500
 Dallas, Texas 75270
 (505) 366-8402
 eMail: esparza.david@epa.gov

Appendix 4

Anthony Timberlands-Malvern

SWPPP

with

attachments

(Site Map, Exhibit A, Exhibit A Explanation

and

Inspection Reports)

Stormwater Pollution Prevention Plan (SWPPP)
For Industrial Activity

National Pollution Discharge Elimination System
General Permit # ARR000000

Permit Tracking Number:

ARR00B476

Prepared for:

Anthony Timberlands, Inc

930 Cabe Street
Malvern, AR 72104

SIC - 2411

NAICS - 321113

Prepared by:

Wilson Anthony

SWPPP Preparation Date:

Adopted October 1, 1993
Revised December 2022
Revised March 2023

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Inspection Records:

[illegible]

Process Description

Anthony Timberlands, Incorporated owns and operates a pine sawmill physically located at 930 Cabe Street in Malvern, Arkansas

Pine logs are transported by truck from the forest to the facility. Rubber-tired mobile equipment unloads the logs which are transferred to either the in-feed system for immediate processing, dry storage for near future processing, or the wet storage area for long-term future demands.

The wet storage system is self-contained, consisting of a storage area, a water storage pond, and a wet circulation system. Pumps are used to spray water from the pond onto logs in the storage area. The runoff from the spraying operations is gravity fed back into the water storage pond for reuse.

The in-feed systems convey the logs one at a time to the debarkers where bark is removed. The bark is collected in hoppers and conveyed to a green fuel storage area. From this point, the collected bark and sawdust is conveyed to the three wood fuel fired boilers. All of the boilers are equipped with Zurn multicyclones to control particulate matter generated from combustion engines from entering the stormwater stream.

The debarked logs proceed to the Sharp Chain or to the Bandmill, depending on their size. They are cut by gang/band saws into different lengths and manufactured into rough lumber. The lumber is trimmed and edged to dimension and any waste is collected in chutes and hoppers before being conveyed to the chipper.

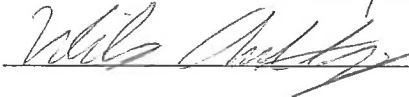
After being sorted according to width, length, and thickness, lumber is kiln-dried in one of the facilities five steam heated drying kilns. Once the lumber has the appropriate moisture content, it is sent through the planer mill where the lumber is smoothed and graded before being packaged for shipping. The planer mill generates "planer shavings" which are collected and sold to outside markets.

Certification

The certification must be signed in accordance with the provisions of 40 CFR 122.22, as adopted by reference in APCEC Regulation 6. See Part 7.8 of the permit for signatory requirements.

"I have read Part 4.2.7.3 of the permit pertaining to the attainment of water quality standards after authorization and agree to adhere to its requirements."

"I 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 gathered and evaluated 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 fine and imprisonment for knowing violations."

Name: Wilson Anthony Title: Director - Regulatory Compliance
Signature:  Date: 12/13/2022

SWPPP Team

Name	Title	Individual SWPPP Responsibilities
Jim Jones	Leader - Plant Manager	Overall supervision of the Pollution Prevention Team and facility activities which impact aspects of the SWPPP.
Jake Jones	Production Superintendent	As Sawmill Supervisor in charge of all green end manufacturing activities, this member has the daily responsibility to ensure that plant operations in areas under his authority are in compliance with the requirements of the Pollution Prevention Plan.
Stacy Shepard	Planer Supervisor	As Planer Supervisor in charge of all dry end manufacturing activities, this member has the daily responsibility to ensure that plant operations in areas under his authority are in compliance with the requirements of the Pollution Prevention Plan.
Buddy Robbins	Maintenance Supervisor	In his capacity as Maintenance Superintendent, this member is charged with ensuring that all hydraulic systems and other machinery containing petroleum products along with supplies for the same are maintained in such a manner that discharges from such sources are kept to a minimum. He is also responsible for using environmentally sound practices in situations involving servicing, cleaning and maintenance of rolling stock along with handling supplies used for this purpose.
Wilson Anthony	Director of Regulatory Compliance	As Director of Regulatory Compliance, this member represents corporate management to ensure that the SWPPP is properly applied and up to date. This team member will conduct quarterly and annual inspections and review and update the plan as needed.

Employee Training

Training Type	Frequency of Training	Topics Covered in Training
SWPP Team training	Annually	Monitoring, inspection, planning, reporting, documentation requirements, and BMP maintenance
Work area specific training	Upon hiring/annually	BMPs and control measures used in specific work area

Employee training is essential to effective implementation of the Stormwater Pollution Prevention Plan. The purpose of the training program is to teach personnel at all levels of their responsibility, the components and goals of the Stormwater Pollution Prevention Plan. When properly trained, personnel are more capable of presenting spills, responding safely and effectively to an accident when one occurs and recognizing situations that could lead to stormwater contamination. Specific instances of required training under the Stormwater Pollution Prevention Plan are:

1. Shop Personnel. Shop foreman should continually train shop personnel in the proper way to store, utilize and dispose of the various chemicals, oils and greases used on a daily basis.
2. Millwrights. As individuals with primary responsibility for the operation of hydraulic units within the mill, millwrights must be instructed in the proper leak free operation of these units. The maintenance superintendent will so train each new millwright and monitor performance of each millwright so as to determine when additional training or instruction may be necessary.
3. Equipment Operators. Operators of rolling stock or stationary equipment with hydraulic controls must be trained to recognize failure of hydraulic hoses and fittings which could result in the release of hydraulic fluid. Preventive maintenance on these systems should be a regular part of any maintenance program.
4. Yard Personnel. Personnel responsible for yarding green and finished lumber. Green lumber must be yarded atop wooden or concrete beams in order to minimize contact with stormwater. Finished lumber is stored under overhangs to minimize their contact with rainwater.
5. Supervisors. Supervisors in all departments should be trained to identify and alleviate all potential sources of stormwater pollution within their departments.

In addition to the above specific individuals requiring training, all employees should be encouraged to participate in the Stormwater Pollution Prevention Plan by identifying potential sources for stormwater pollution and participating in devising solutions for alleviating such discharges.

CHAPTER 1- GENERAL INFORMATION

1.1 PLANT LOCATION

Name: Anthony Timberlands, Inc
Address: 930 Cabe Street
Malvern, AR 72104
Phone #: (501) 337-7551

1.2 USGS PLANT COORDINATES

Latitude: 34° 21' 47" N
Longitude: 92° 49' 15" W

1.3 EMERGENCY CONTACTS

PRIMARY

Name: Rob Lankford
Title: Plant Manager
Work Phone: (501) 337-7551
Emergency: (501) 337-4597

ALTERNATE #1

Name: Steven M. Anthony
Title: President
Work Phone: (870) 687-3611
Emergency: (501) 627-8526

ALTERNATE #2

Name: Jim Jones
Title: Vice President- Pine Production
Work Phone: (501) 337-7551
Emergency: (870) 246-5285

1.4 TYPE OF MANUFACTURER

Anthony Timberlands, Inc. manufactures, kiln dries and finishes Southern Yellow Pine lumber.

1.5 SIC CODES

List the four (4) digit code and a brief description of your industrial activity.

PRIMARY:

2411

Description: Sawmill and Planing Mill

1.6 EPA IDENTIFICATION NUMBER

[If you generate hazardous waste at your facility, you are required to apply to the Federal EPA for a Hazardous Waste Activity Form 8700-12. EPA will then give you a twelve (12) digit number for your use on manifests for the hazardous waste activity and on forms or reports submitted to state and federal agencies in the future. If this does not apply, put "NA"- (Not Applicable)].

NA

1.7 OPERATING SCHEDULE

Plant operates the sawmill and planing mill on a two shift basis, from approximately 6 a.m. until 3 a.m. Monday through Friday. Certain manufacturing functions (kiln drying, boiler operation) are performed around the clock.

1.8 EXISTING ENVIRONMENTAL PERMITS

TYPE OF PERMIT	PERMIT NUMBER	EXPIRATION
Stormwater Discharge	ARR00B476	06/30/2024
Title V Air Operating	1140-AOP-R9	09/01/2025

1.9 FACILITY SECURITY

Facility security is contracted through third party security firm, Allied Security. Overall security at the plant-site is poor, due in part to its location and the presence of a former city street which bisects the plant-site. It is common for trespassers to enter the plant-site.

Chapter 2: FACILITY DESCRIPTION

2. 1 Outfall Information

Outfall Number: <u>001</u>		Outfall Coordinates: Latitude: <u>34° 21' 43"</u> N Longitude: <u>92° 49' 26"</u> W
Receiving Streams	Drainage from Outfall 001 follows an unnamed tributary to Town Creek, thence to Chatman Creek, thence to the Ouachita River.	

Outfall Number: <u>002</u>		Outfall Coordinates: Latitude: <u>34° 21' 55.89"</u> N Longitude: <u>92° 49' 27.43"</u> W
Receiving Streams	Drainage from Outfall 002 flows out of the facility into Town Creek, thence to Chatman Creek, thence to the Ouachita River.	

Outfall Number: <u>003</u>		Outfall Coordinates: Latitude: <u>34° 21' 55.89"</u> N Longitude: <u>92° 49' 26.78"</u> W
Receiving Streams	Drainage from Outfall 002 flows out of the facility into Town Creek, thence to Chatman Creek, thence to the Ouachita River.	

The facility notes that a city stormwater pipe discharges in the middle of the facility along Cabe St. and sends a large amount of water down the ditches that lead to Outfall 002 and 003. So, the facility believes that discharges from these outfalls are not representative of the facility.

2.2 Industrial Activities

Industrial Activity	Associated Pollutants	Outfall(s) Affected
Raw and Finished Materials Storage	COD, BOD	001,003
Vehicle and Equipment Fueling	O&G	002, 003
Steam Cleaning - Vehicles/Equipment	Oil & Grease, TSS, Hydraulic	002
Kiln Drying	Hydraulic Fluid	001
Sawmill/Planer Mill Operation	Oil & Grease, BOD, COD, Hydraulic Fluid	001,002,003
Log Watering (Wet Decking)	COD BOD	001

2.3 Exposed Inventories / Potential Pollution Sources

Inventory	Associated Pollutants	Outfall(s) Affected
1. Wood Fuel Pile	BOD, COD, TSS	001
2. Fueling Area - Diesel Fuel	Oil & Grease	002, 003
3. Vehicle and Equipment - Steam Cleaning Pad	Oil & Grease, COD, Hydraulic	002
4. Hog Fuel	BOD, COD, TSS	001,002
5. Boiler Blowdown	BOD, COD, TSS	001
6. Wet/Dry Log Yard	BOD, COD, TSS	001
7. Hydraulic Equipment	Oil & Grease, Hydraulic Fluid	001,002,003
8. Scrap Metal/Equipment	Oil & Grease, Hydraulic Fluid	003
9. Residual Loading Stations	BOD, COD, TSS	001
10. Waste Tires	Oil & Grease	003
11. Fire Suppression	BOD, COD, TSS	001

1. **WOOD WASTE FUEL PILE.** The company, as a result of its log merchandising practices accumulates large volumes of bark and other wood waste which is accumulated adjacent to the log debarker. As this material is generated, it is fed by use of a wheeled loader into a wood hog which reduces the material to its final use as wood fuel. The fuel is then conveyed by a system of chain conveyers to a Peerless Bin for truck loading and delivery to outside markets.

Due to the nature of the material involved, the potential exists for large amounts of particulate matter (suspended solids) to be included in any storm water stream. The runoff from this storage area is presently directed to the mill's clarifier where any suspended solids are allowed to settle.

BMPs

- A. Practice inventory control whereby outside storage of delivered wood fuel is kept to a minimum. Schedule deliveries of dry waste for such times that it can be directly inserted within the fuel house.
- B. Ensure that runoff from this area is channeled to the logyard pond

2. **FUELING AREA.** Pursuant to underground storage tank (UST) regulations, the mill's USTs were removed in 1998 and replaced with a single above ground tank. This new tank contains all required spill control and leak overflow protection systems which are a big improvement over the old USTs. At the time of their closure, ADEQ certified the site of the old tanks as free from contamination.

The new fueling station is located on the East side of Cabe Street. Rolling stock being refueled is positioned on a concrete slab adjacent to the tank. In the process of fueling, it is possible for extremely small amounts of fuel to spill onto the ground and enter a subsequent storm water stream.

BMPs

- A. Train employees in the proper method of fueling rolling stock.
- B. Train employees to immediately apply dry sawdust to any spills in the re-fueling process and dispose of it in a roll-off box before it can come into contact with stormwater.

3. **STEAM CLEANING.** Currently, company owned vehicles and rolling stock are periodically steam cleaned adjacent to the shop building. Runoff from this process can be contaminated with oil, grease, hydraulic fluid and suspended solids which is removed by the high pressure steam.

Prior to 1997, the shop building was located West of Cabe Street with the resultant runoff directed to the settling pond adjacent to the mill log yard. Relocation of the shop building East of Cabe Street takes the settling pond out of reach.

BMPs

- A. A bermed concrete pad was installed where all vehicle cleaning takes place.
- B. An oil water separator/clarifier system was installed where all water from vehicle cleaning operations is directed. This separator/clarifier system is periodically cleaned by an environmental services company.

4. **HOG FUEL/BUCKET ELEVATOR/FUEL SILO.** With conversion to a wood fired boiler system in 2003, a new fuel management system was installed. The system entails hogging potential wood fuel, conveying it to a bucket elevator system where it is then directed either to a storage silo for use in the wood boilers or to load out stations for transport to third party fuel customers. The abundance of transfer points, coupled with the nature of the material being conveyed, results in several areas of wood waste accumulation.

BMPs

- A. Through a system of preventive maintenance, ensure that all fuel handling and storage systems are operating at peak efficiency.
- B. Using inventory control, ensure that all fuel handling and storage systems are not operated at levels beyond their capacity.
- C. Practice good housekeeping in frequently cleaning up areas where fuel accumulates.
- D. Direct the runoff from these areas to the clarifier where suspended solids can be removed.

5. BOILER BLOWDOWN. Condensate from the facility's wood fired boiler system is discharged directly into general plant runoff. This discharge contains certain treatment chemicals designed to prevent rusting of steam lines. In 2015, the facility installed a concrete filter which helps removed contaminants and particulate from this discharge.

6. LOG YARD. As a lumber manufacturing operation, the company inventories large volumes of pine logs for use in its manufacturing process. It is necessary to keep this inventory watered to prevent stain and decay. Runoff from this process contains suspended solids as well as tannins released from the logs.

BMPs

- A. Direct runoff from log storage areas to a settling pond where water can be recycled and suspended solids can be removed.

7. HYDRAULIC UNITS. A number of pieces of equipment throughout the mill are powered by use of hydraulic power, necessitating the use of hydraulic fluid. Frequently these units discharge hydraulic fluid through broken or worn out fittings and hoses as well as during refilling.

BMPs

- A. Maintain all hydraulic units in such a way as to minimize failure of hoses and fittings.
- B. Cover and localize the areas surrounding such hydraulic units in such a way as to prevent any accidental discharge from entering the storm water stream.
- C. Train employees in the proper method of operating and maintaining hydraulic equipment so as to minimize the possibility of accidental discharge.

- D. Utilize oil booms around each hydraulic unit to capture any spills or leaks before they enter the waste stream.

8. SCRAP METAL/WORN OUT EQUIPMENT. Over time, equipment, gear boxes, motors and rolling stock wear out or break down and accumulate in the area adjacent to the shipping department. Periodically, this material is gathered and sold for scrap or scavenged for spare parts. If allowed to stand for long periods of time, oxidation will lead to rusting and flaking of metal. Also, captive fluids could possibly escape into the storm water waste stream.

BMPs

- A. Ensure that all rolling stock, gear boxes, and other machinery containing fluids are drained prior to placement in the scrap yard.
- B. Periodically auction the contents of the scrap yard.
- C. Contract with a local scrap dealer for removal of smaller pieces of scrap metal generated at the shop, such metal to be stored in a closed top dumpster.

9. RESIDUAL LOADING STATIONS. In the course of its lumber manufacturing operations, the facility generates large volumes of residual by-products which are captured, conveyed and stored for sale to outside markets. Conveyance of these various materials, including bark, fuel, green pine chips, planer shavings and sawdust is accomplished by use of chain or belt conveyers or pneumatic blowers. During the course of this conveyance certain volumes of material are spilled or released into the area exposing them to storm water streams.

In addition, these materials are stored in Peerless Bins for truck loading. The nature of the material, coupled with the loading method (gravity flow), results in further spillage or release of material during the loading process.

BMPs

- A. Through a system of preventive maintenance, ensure that all waste delivery and storage systems are operating at peak efficiency.
- B. Using inventory control, ensure that all waste delivery and storage systems are not operated at levels beyond their capacity.
- C. Train employees and contractors in proper loading practices so as to minimize the amount of material spilled during these procedures.
- D. Direct the runoff from these areas to the log settling pond or clarifier where suspended solids can be removed.

10. **WASTE TIRES.** The facility operates many large-tired vehicles on-site. Periodically, these vehicles will require tire changes. Currently, the facility's tire vendor removes a used tire every time they bring a new tire. A small area behind the planer mill contains a number of waste tires that were accumulated prior to this vendor deal referenced above. Anthony Timberlands has been attempting to remove these tires through the DEQ's Waste Tire Program for two years with little success. ATI will continue to attempt to permanently remove these tires. In order to prevent stormwater accumulation in the waste tires, the facility will periodically turn and rearrange them until they can be removed from the facility.

11. **FIRE SUPPRESSION.** Periodically, the facility must perform non-emergency fire suppression activities. Runoff from these activities is directed back into the facility's logyard pond in order to prevent excessive sediment runoff.

2.4 Non-Stormwater Discharges

The following non-stormwater discharges are present at the facility:

- 1) Vehicle wash water – Vehicle wash water currently runs through an oil/water separator before being discharged. The facility is in the process of diverting this wash water into a septic/storage tank and will have it pumped out periodically.
- 2) Kiln Condensate – The facility is evaluating options for kiln condensate. Currently, the kiln condensate flows to the facility's clarifier at Outfall 001. The facility is in communication with the City of Malvern to discharge this water into the sewer system. Additionally, the facility is exploring options to direct this water to the facility's logyard pond where it will be covered under an Individual NPDES permit.
- 3) Boiler Blowdown - The facility is evaluating options for boiler blowdown. Currently, it flows to the facility's clarifier at Outfall 001. The facility is in communication with the City of Malvern to discharge this water into the sewer system.
- 4) Fire Suppression Water – Fire suppression water is currently routed to the facility's logyard pond.
- 5) Wet Decking – The facility currently sprays water onto its logs. This water is recaptured in its logyard pond for re-circulation.

The facility is currently preparing a permit application which would allow discharge of item 1 through outfall 003 and items 2-5 from outfall 001. Submission of this permit application should occur by the last week of March 2023.

2.5 Impaired Stream Designation

The facility has reviewed the most recent 303(d) and TMDL listings, noting that Town Creek is not included. Facility management will review all new listings for Town Creek, and adjust BMPs if necessary.

Impaired Waterbody name	Cause of Impairment
None	N/A

2.6 Monitoring Requirements

Parameter	Check Box if a Limitation	Benchmark or Limitation	Frequency of Monitoring
pH	☐	6.0-9.0 S.U.	Annually
Total Suspended Solids (TSS)	☐	100 mg/L	Annually
COD	☐	120 mg/L	Annually
Oil & Grease	☐	15 mg/L	Annually
Zinc	☐	0.684 mg/L	Annually

Responsible Staff: Wilson Anthony - Director of Regulatory Compliance

Logistics: During a measurable storm event, the responsible staff will obtain stormwater samples from Outfall 001, 002, and 003. Sampling is done in accordance with the *Guidelines Establishing Test Procedures for the Analysis of Pollutants* located in 40 CFR Part 136 and the latest revision of *Standard Methods for the Examination of Water and Wastewater* (APHA).

Laboratory to be used: American Interplex

2.7 BEST MANAGEMENT PRACTICES

1. GOOD HOUSEKEEPING. The following practices should be instituted immediately and should be a part of everyday operations at the facility:

- a. Keep all loading/unloading areas clean and dry. Remove all grease and oil leaks or stains promptly when found.
- b. Ensure that all hydraulic hoses and fittings are operating properly and are well maintained to prevent the escape of hydraulic fluids.
- c. All spare, used or scrap motor, gearboxes or other equipment containing fluids should be stored inside a covered shed and monitored for leaks.
- d. Other scrap metals should either be sold as produced, (stored in dumpster behind shop) or accumulated and disposed of as soon as possible.
- e. All drums, full or empty, unless properly cleaned, should be stored in covered sheds and monitored for leaks.
- f. Compile a listing of all chemical substances present on the plant-site, their location and storage practices as well as disposal methods.
- g. Ensure that all such chemicals are properly labeled and that employees are properly trained in their usage.
- h. Periodically, any waste tires should be turned to prevent the presence of nuisance species.
- i. Continuously monitor plant-wide activities so as to ensure that provisions of the Pollution Prevention Plan are complied with.

2. PREVENTIVE MAINTENANCE. All equipment, rolling stock and pollution control devices should be regularly maintained so as to decrease the chance for emissions into stormwater runoff. These include:

- a. **ROLLING STOCK.** All forklifts, log loaders and log lifts should be scheduled for regular maintenance. Part of this maintenance program should include close inspection of all hydraulic hoses and fittings and replacement of defective parts.
- b. **HYDRAULIC UNITS.** Hydraulic units located throughout the mill should be observed on a daily basis to ensure the integrity of the system and the proper functioning of all hoses and fittings.

c. **MOTORS AND GEARBOXES.** All motors and gearboxes containing oil or fluids should be observed daily for possible leakage.

3. INSPECTIONS. All aspects of the Pollution Prevention Plan should be the subject of regular inspections to ensure compliance with the terms thereof. Specific areas of responsibility are as follows:

a. **PLANT MANAGER.** Plant Manager should conduct plant-wide inspections at least on a quarterly basis in order to identify any areas of non-compliance and to update provisions of the Pollution Prevention Plan where necessary.

b. **DEPARTMENTAL SUPERVISORS.** Departmental Supervisors should observe operations on a daily basis and take corrective action where necessary to comply with provisions of the Pollution Prevention Plan.

c. **MAINTENANCE SUPERINTENDENT.** Maintenance Superintendent should routinely inspect all hydraulic units, gearboxes and motors for evidence of leakage. He should also institute a program of preventive maintenance of all such systems.

d. **SHOP FOREMAN.** Shop Foreman should institute a program of preventive maintenance for all rolling stock on the plant site, focusing for purposes of this plan on hydraulic hoses and fittings and the integrity of these systems. Foreman should also monitor use and disposal of all used or stored fluids and chemical used in the shop.

4. SPILL PREVENTION AND RESPONSE. For all areas holding the possibility of spillage of chemicals or fluids set out herein, a plan of spill prevention and response should be instituted. These plans should focus on:

a. Identifying the source of the spill;

b. Discontinuing the spill;

c. Preventing the spilled fluids from reaching ditches or other drainage devices which may transmit such fluids to waters of the U.S.;

d. Notification of any and all authorities with a need to know of the spill; and

e. Clean up of the area impacted by the spill.

5. EMPLOYEE TRAINING. All employees responsible for the use and/or maintenance of equipment or materials with the potential to pollute stormwater should be trained in methods to prevent or manage such pollution. This should include:

a. Operators or rolling stock using hydraulic controls should monitor potential leakage of hoses and fittings.

b. Shop personnel that handle petroleum products and/or other toxic chemicals should be trained in their use and disposal.

c. Front line supervisors in departments utilizing motors, gearboxes and/or hydraulic units should be trained in the maintenance and monitoring of these devices.

6. EROSION AND SEDIMENT CONTROLS. The facility will stabilize exposed areas and control runoff in order to minimize erosion and sedimentation and the discharge of pollutants. BMPs to minimize erosion and sedimentation include.

a. Establishment and maintenance of concrete clarifier for stormwater to remove particulate and O&G before it is discharged.

b. Maintain grass around the plant-site to prevent excessive erosion and TSS production during storm events.

7. MANAGEMENT OF RUNOFF. The facility must implement appropriate measures to manage the runoff from the property in such a manner as to minimize the pollutants in the discharge. All stormwater runoff is directed towards a settlement pond on site or a concrete clarifier before being discharged. The facility notes that any discharge from the settlement pond flows into the clarifier. The facility will adequately maintain all drainage areas and the settlement pond to ensure that runoff is captured

a. Maintain drainage ditches to ensure that runoff flows through the facility's concrete clarifier before being discharged or to the settlement pond.

8. CLARIFIER UPKEEP – The facility's oil/water separator at Outfall 001 should be inspected on a daily basis. Any accumulations of product should be removed with a pool skimmer. The oil/water separator at the vehicle cleaning pad should be inspected on a weekly basis. Periodically, an environmental services company will be contracted to do a more thorough removal of product/sheening with a vacuum truck. Both oil/water separators should be serviced when a vacuum truck is on site. Quarterly site inspections should note the condition of each clarifier and if it is necessary to clean them more frequently.

9. HYDRAULIC UNITS – All hydraulic units are stored on concrete and under cover. These units have spill containment surrounding the reservoir. Oil booms are utilized around these units to capture any spills or leaks that are not caught by the spill containment.

10. STORAGE OF PETROLEUM PRODUCTS – Petroleum products should be labeled appropriately and stored on concrete and under cover. Quarterly inspections should make note of instances where 55-gallon drums and other petroleum products are not stored appropriately.

2.8 Advanced Best Management Practices

1. **STEAM CLEANING AREA.** Since the relocation of the Shop building to the West side of Cabe Street, access to the settling pond adjacent to the mill log yard was no longer available. As a result, suspended solids and residual petroleum products generated through the steam cleaning of company rolling stock could no longer be directed into the facility's settlement pond. In 2002, the facility installed an oil/water separator to filter out pollutants. In January 2023, the facility rebuilt the steam cleaning pad and added higher berms to ensure that all water in the cleaning process is directed into the oil/water separator.
2. **SAWMILL AREA.** Runoff from the sawmill and kiln areas discharges on the western portion of the property. Currently, this area is all concreted, so large amounts of TSS and other particulate matter is picked up and carried off-site during heavy rainfall. A concrete clarifier was installed in 2015 to pick up a particulate and/or oil & grease prior to discharge. In 2017, a larger clarifier was installed. Clean the clarifier on a regularly scheduled basis.

2.9 Inspection Schedule and Procedure

Inspection Type	Person(s)/Position(s) Responsible	Inspection Frequency	Items Inspected
Routine facility	Wilson Anthony - Director of Regulatory Compliance	Quarterly	All potential pollution sources, facility outfall, non-stormwater or process water review, general observations
Comprehensive	Wilson Anthony - Director of Regulatory Compliance	Annually	Review of BMPs, structural storm water control measures, potential pollution sources and all site operations that have the potential to impact the facility's storm water runoff.

3.1 Spill and Leak Response Plan

Person(s)/Position(s) Responsible for Contacting Emergency Response Agency	Agency Name	Agency Phone Number
Jim Jones - Plant Manager	National Response Center	800-424-8802

Spill Prevention and Response Procedures:

The facility's spill and leak response plan is covered through its BMPs. The facility's diesel fuel storage tank is the area most susceptible to large spills or leaks. The facilities maintenance supervisor performs weekly maintenance checks to ensure that the storage tank is operating properly.

Spills and Leaks Records:

In September 2022, the facility was identified as a responsible party for the release of petroleum products into an unnamed tributary to Town Creek. The facility is currently working with DEQ and EPA officials on remediation activities.

3.2 Housekeeping Practices

Waste material will be picked up every 1 day.

Routine inspections for leaks and conditions of drums, tanks, and containers will be conducted every 7 days.

Additional Information (if necessary): Waste pickup is dependent on the operating status of the mill. The answer above assumes the facility is operating at full capacity. Waste consists of mainly wood shavings.

3.3 Employee Training Schedule:

[illegible]

3.4 Non-Stormwater Discharge Certification:

Potential significant sources of non-stormwater discharges: Boiler blowdown, wetdecking, kiln condensate, vehicle washing, fire suppression

Description of the results of any test or evaluation for the presence of non-stormwater discharges: The discharges above have been noted and permit changes are being made.

Evaluation criteria and testing method used: visual

Date(s) of testing or evaluation: Sept, October, + November 2022

On-site drainage points that were directly observed during a test: Outfall 001, 002, 003

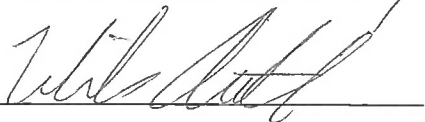
If evaluation is not possible, describe why: _____

"I certify that the discharge has been tested or evaluated for the presence of illicit non-stormwater discharges and that all identified unauthorized discharges have been eliminated"

"I 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 fine and imprisonment for knowing violations."

Print Name Wilson Anthony

Title 12/13/2022

Signature 

Date 12/13/2022

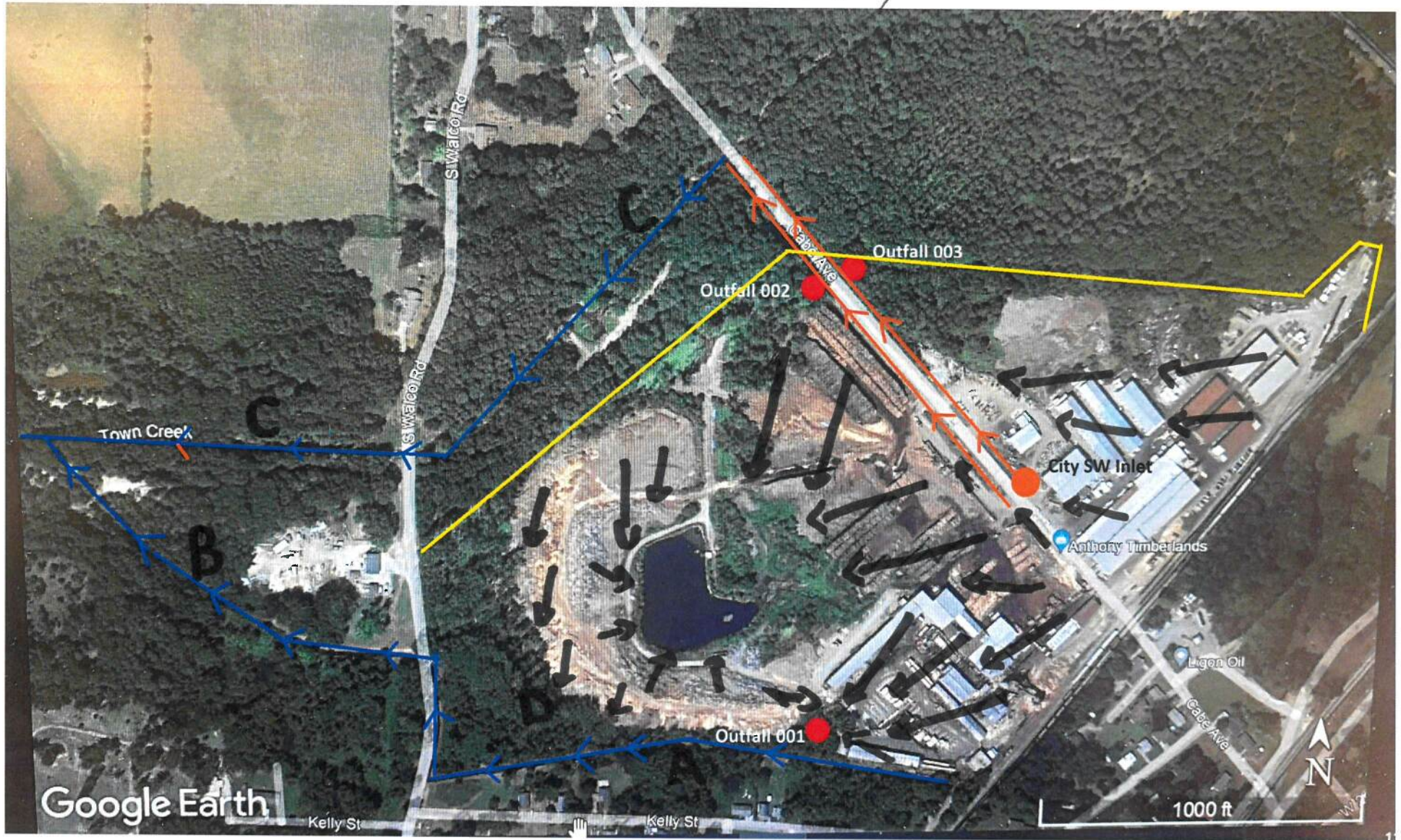
3.5 Sampling Data - Stormwater Annual Reports (SWAR):

[illegible]

3.6 BMP Maintenance Records:

BMPs are inspected annually by the Director of Regulatory Compliance as part of the Annual Comprehensive Site Compliance Evaluation Report.

Total Site Area - Approximately 63.50 acres



A - concrete stormwater ditch

B - unnamed tributary to Town Creek

C - Town Creek

D - holding ditch where runoff is pumped to the logyard pond

Black Lines - indicate stormwater flow

Orange Lines - internal ditch along Cabe Ave.

Yellow Lines - property lines. The remainder of the property extends along the concrete ditch then along the RR.

Blue Lines - receiving waters

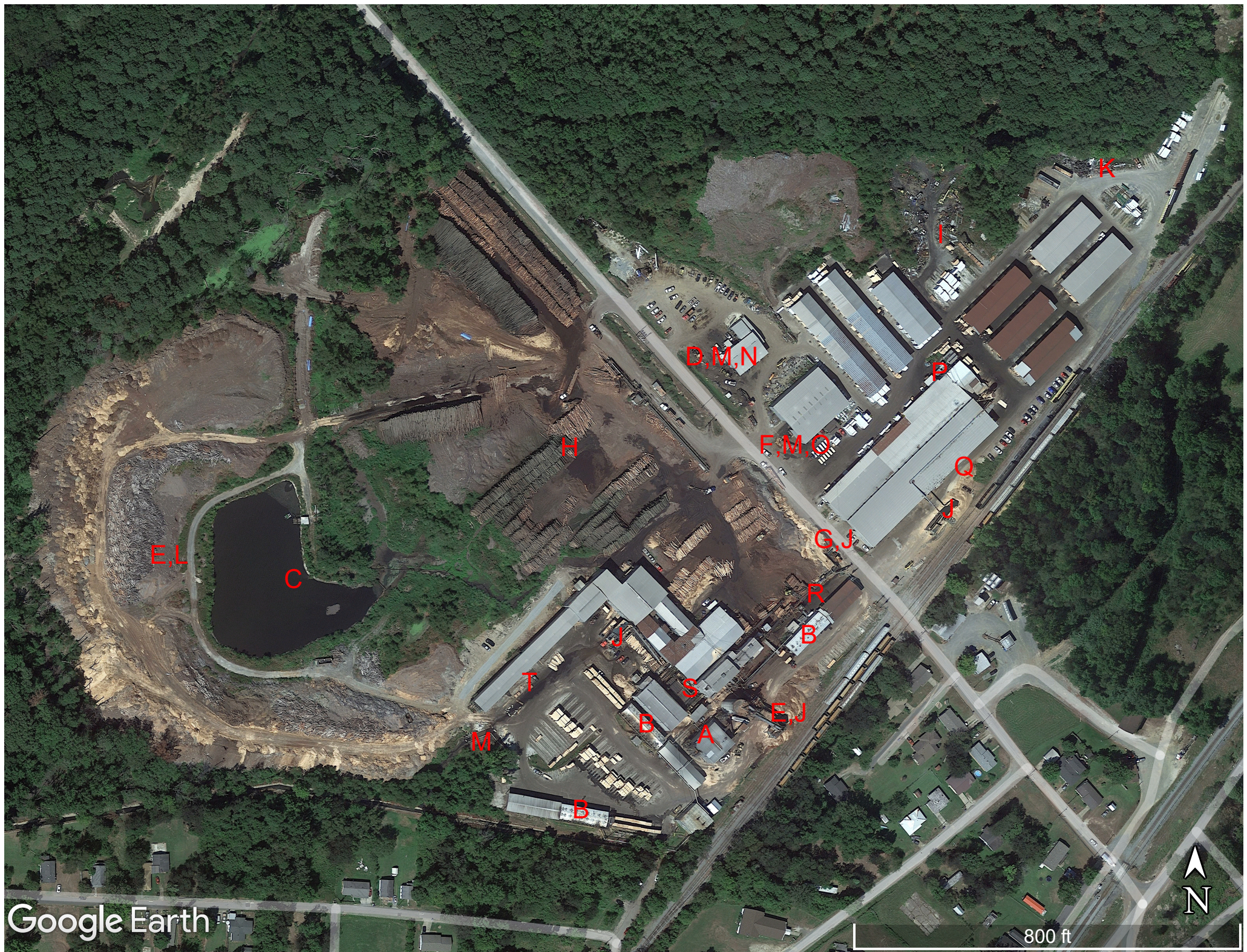


Exhibit A Explanation

A – Boiler Blowdown. This is a non-stormwater discharge.

B – Kiln Condensate. This is steam condensate from wood drying activities. Non-stormwater discharge.

C – Wet Decking. This consists of water runoff from log watering activities in the log yard (H). Non-stormwater discharge.

D – Vehicle Cleaning. This consists of runoff from vehicle washing operations at the shop. Water is directed towards a concrete clarifier before being discharged. This is a non-stormwater discharge.

E – Wood Fuel Pile

F – Vehicle Fueling Area

G – Hog Fuel

H – Log yard

I – Scrap metal/equipment laydown

J – Residual product loading

K – Waste Tires

L – Fire Suppression. Periodically, during very dry weather, sprinklers are run on the wood fuel pile to prevent/suppress a fire. This water is captured and sent to the log yard pond (C). This is a non-stormwater discharge.

M – Concrete oil/water separators. These units separate solids and O&G from water prior to discharge.

N – Bulk petroleum storage tanks: 550 gallon, two 1000 gallon, and 550 gallon portable

O – Bulk petroleum storage tanks – 12,500 gallon and 100 gallon

P – Bulk petroleum storage tank – 350 gallon

Q – Bulk petroleum storage tank – 350 gallon

R – Bulk petroleum storage tank – 1000 gallon

S – Bulk petroleum storage tanks – Two 2,000 gallon

T – Bulk petroleum storage tank – 1,000 gallon

QUARTERLY SITE INSPECTION REPORT
ANTHONY TIMBERLANDS, INC.- MALVERN
PERMIT NO: ARR00B476

Date: 03/16/2023

POTENTIAL POLLUTION SOURCES:

1. Storage of Boiler Fuel

Are Best Management Practices associated with storage of boiler fuel being followed? Yes

Is runoff from fuel storage being directed to settling pond? Yes, pumped from clarifier.

2. Fueling area

Is there any indication that fuel has been spilled in the process of operating the pumps? No

3. Petroleum Products

Where and how are petroleum products currently being stored? on concrete under cover

Is there any indication that petroleum products have been allowed to enter a waste stream? No

4. Steam Cleaning

Is the product of equipment steam cleaning being processed through a clarifier? Yes

Is the clarifier in good working order? Clarifier is in good condition + new concrete pad is in excellent shape

5. Residual Products

Are company policies for storing and loading developing residual products being followed? Yes

6. Hydraulic Units

Are hydraulic units operating properly? Yes

Is there any indication that hydraulic fluid is entering the waste stream? No, the facility has booms set up to capture any leaks.

7. Outfall Clarifier

Is the clarifier in good operating condition? Excellent.

If mill discharge being directed into the clarifier (if a discharge is occurring)? No discharge

FACILITY OUTFALL

At the time of inspection, was there a discharge of stormwater? No

If so, describe the appearance of the waste stream. N/A

PLANT INSPECTION

Was the plant inspected for the presence of any non-stormwater or process water discharge? Yes

Was any such discharge identified? Boiler blowdown, kiln condensate, wet decking were noted + the facility is obtaining additional permits for these discharges.

OBSERVATIONS

Are there any other relevant observations pertaining to plant practices or environmental conditions that need to be addressed pursuant to the plant's Stormwater Pollution Prevention Plan? No

ACTIONS

Are there any actions recommended to enhance compliance with the requirements of the Stormwater permit or the plant's SPPP? No

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**ANTHONY TIMBERLANDS, INC.- MALVERN
ANNUAL COMPREHENSIVE SITE COMPLIANCE EVALUATION REPORT FORM**

Inspector: Wilson Anthony Date: 12/29/22

Section I: Note any changes in site operations that have occurred since the previous inspection that have the potential to impact the facility's storm water runoff.

Inspection Area	Changes/modifications	Adequacy of BMPs	Corrective Action Taken
Log Yard	None	Adequate	—
Green Sawmill	Adjusted BMPs related to hydraulic units and the clarifier	Inadequate	Corrective action began 9/22/22
Sorter and Yard	None	Adequate	—
Planer Mill	Added secondary containment to bulk oil tanks and booms surrounding hydraulic units	Adequate	see changes made
Shipping Area	None	Adequate	—
Boiler Room	None	Adequate	—
Shop Area	Reviewed procedures relating to oil spills in the area.	Adequate	—
Fueling Area	None	Adequate	—

Section II: Review Inventory of potential pollution sources for additions, deletions and/or changes.

Item	Observations
Potential Pollutant Sources To Be Added to Plan	
Potential Pollutant Sources Deleted From Plan	
Changes to Potential Pollutant Sources Currently Identified in Plan	

Section III: Evaluate the Facility for the Presence of Unauthorized Non-Storm Water Discharges:

Discharge related to kiln drying, boiler blowdown, + wet-decking were noted at the facility's outfall. The facility is in the process of obtaining an NPDES permit for this discharge. Additionally, equipment washwater was being directed to outfall out. Proper permitting is being obtained for this discharge as well.

Section IV: Evaluate the effectiveness of the existing Best Management Practices (BMPs).

BMP	Adequate?	Actions Required	Date
Housekeeping	No, BMPs added related to clarifier cleaning	BMPs added	9/22 + 10/22
Preventive Maintenance	Yes	N/A	
Spill Prevention and Control	No, BMPs added relating to spills of petroleum products	BMPs added	9/22 + 10/22
Visual Inspections	Yes	N/A	
Employee Training	Yes	N/A	
Sediment and Erosion Control	Yes	N/A	
Management of Runoff	No, BMPs added relating to spills of petroleum product	BMPs added	9/22 + 12/22
Record Keeping	Yes	N/A	

Section V: Ensure that existing structural storm water control measures are operating properly.

Structural Control	Operating Properly?	Comments or Corrective Action	Date
Ditches are free of blockage	Yes		
Culverts are in good shape	Yes		
Fueling station mechanisms	Yes		
Separator/Clarifier	Yes	Additional discharge pipes were added (12/22). Brooming was added as well. Clarifier is being cleaned on a more regular schedule now.	12/22

QUARTERLY SITE INSPECTION REPORT
ANTHONY TIMBERLANDS, INC.- MALVERN
PERMIT NO: ARR00B476

Date: 08/04/22

POTENTIAL POLLUTION SOURCES:

1. Storage of Boiler Fuel

Are Best Management Practices associated with storage of boiler fuel being followed? Yes, fuel pile is somewhat large though
Is runoff from fuel storage being directed to settling pond? Yes

2. Fueling area

Is there any indication that fuel has been spilled in the process of operating the pumps? No

3. Petroleum Products

Where and how are petroleum products currently being stored? on concrete, looking into building an overhang to cover them from rain
Is there any indication that petroleum products have been allowed to enter a waste stream? No

4. Steam Cleaning

Is the product of equipment steam cleaning being processed through a clarifier? Yes
Is the clarifier in good working order? Yes

5. Residual Products

Are company policies for storing and loading developing residual products being followed? Yes

6. Hydraulic Units

Are hydraulic units operating properly? Yes
Is there any indication that hydraulic fluid is entering the waste stream? No

7. Outfall Clarifier

Is the clarifier in good operating condition? yes
If mill discharge being directed into the clarifier (if a discharge is occurring)? yes

FACILITY OUTFALL

At the time of inspection, was there a discharge of stormwater? no
If so, describe the appearance of the waste stream. N/A

PLANT INSPECTION

Was the plant inspected for the presence of any non-stormwater or process water discharge? yes
Was any such discharge identified? none noted

OBSERVATIONS

Are there any other relevant observations pertaining to plant practices or environmental conditions that need to be addressed pursuant to the plant's Stormwater Pollution Prevention Plan? N/A

ACTIONS

Are there any actions recommended to enhance compliance with the requirements of the Stormwater permit or the plant's SPPP? N/A

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QUARTERLY SITE INSPECTION REPORT
ANTHONY TIMBERLANDS, INC.- MALVERN
PERMIT NO: ARR00B476

Date: 05/10/22

POTENTIAL POLLUTION SOURCES:

1. Storage of Boiler Fuel

Are Best Management Practices associated with storage of boiler fuel being followed? yes

Is runoff from fuel storage being directed to settling pond? yes

2. Fueling area

Is there any indication that fuel has been spilled in the process of operating the pumps? no

3. Petroleum Products

Where and how are petroleum products currently being stored? on concrete

Is there any indication that petroleum products have been allowed to enter a waste stream? no

4. Steam Cleaning

Is the product of equipment steam cleaning being processed through a clarifier? yes

Is the clarifier in good working order? yes

5. Residual Products

Are company policies for storing and loading developing residual products being followed? yes

6. Hydraulic Units

Are hydraulic units operating properly? yes

Is there any indication that hydraulic fluid is entering the waste stream? no

7. Outfall Clarifier

Is the clarifier in good operating condition? Yes
If mill discharge being directed into the clarifier (if a discharge is occurring)? Yes

FACILITY OUTFALL

At the time of inspection, was there a discharge of stormwater? No
If so, describe the appearance of the waste stream. N/A

PLANT INSPECTION

Was the plant inspected for the presence of any non-stormwater or process water discharge? Yes
Was any such discharge identified? None noted

OBSERVATIONS

Are there any other relevant observations pertaining to plant practices or environmental conditions that need to be addressed pursuant to the plant's Stormwater Pollution Prevention Plan? N/A

ACTIONS

Are there any actions recommended to enhance compliance with the requirements of the Stormwater permit or the plant's SPPP? _____

N/A
W. H. [Signature]

QUARTERLY SITE INSPECTION REPORT
ANTHONY TIMBERLANDS, INC.- MALVERN
PERMIT NO: ARR00B476

Date: 01/20/22

POTENTIAL POLLUTION SOURCES:

1. Storage of Boiler Fuel

Are Best Management Practices associated with storage of boiler fuel being followed? Yes, fuel pit is small & well maintained

Is runoff from fuel storage being directed to settling pond? Yes

2. Fueling area

Is there any indication that fuel has been spilled in the process of operating the pumps? No

3. Petroleum Products

Where and how are petroleum products currently being stored? on concrete

Is there any indication that petroleum products have been allowed to enter a waste stream? No

4. Steam Cleaning

Is the product of equipment steam cleaning being processed through a clarifier? Yes

Is the clarifier in good working order? Yes

5. Residual Products

Are company policies for storing and loading developing residual products being followed? Yes

6. Hydraulic Units

Are hydraulic units operating properly? Yes

Is there any indication that hydraulic fluid is entering the waste stream? No

7. Outfall Clarifier

Is the clarifier in good operating condition? Yes

If mill discharge being directed into the clarifier (if a discharge is occurring)? Yes

FACILITY OUTFALL

At the time of inspection, was there a discharge of stormwater? No

If so, describe the appearance of the waste stream.

N/A

PLANT INSPECTION

Was the plant inspected for the presence of any non-stormwater or process water discharge? Yes

Was any such discharge identified? None noted

OBSERVATIONS

Are there any other relevant observations pertaining to plant practices or environmental conditions that need to be addressed pursuant to the plant's Stormwater Pollution Prevention Plan? No

ACTIONS

Are there any actions recommended to enhance compliance with the requirements of the Stormwater permit or the plant's SPPP?

N/A

[Signature]

QUARTERLY SITE INSPECTION REPORT
ANTHONY TIMBERLANDS, INC.- MALVERN
PERMIT NO: ARR00B476

Date: 12/06/21

POTENTIAL POLLUTION SOURCES:

1. Storage of Boiler Fuel

Are Best Management Practices associated with storage of boiler fuel being followed? Yes

Is runoff from fuel storage being directed to settling pond? Yes

2. Fueling area

Is there any indication that fuel has been spilled in the process of operating the pumps? Slight staining

3. Petroleum Products

Where and how are petroleum products currently being stored? on concrete

Is there any indication that petroleum products have been allowed to enter a waste stream? None

4. Steam Cleaning

Is the product of equipment steam cleaning being processed through a clarifier? Yes

Is the clarifier in good working order? Yes

5. Residual Products

Are company policies for storing and loading developing residual products being followed? Yes

6. Hydraulic Units

Are hydraulic units operating properly? Yes

Is there any indication that hydraulic fluid is entering the waste stream? None noted

7. Outfall Clarifier

Is the clarifier in good operating condition? Yes

If mill discharge being directed into the clarifier (if a discharge is occurring)? Yes

FACILITY OUTFALL

At the time of inspection, was there a discharge of stormwater? Yes

If so, describe the appearance of the waste stream. Clear + free

of visible sheen + debris

PLANT INSPECTION

Was the plant inspected for the presence of any non-stormwater or process water discharge? No

Was any such discharge identified? With rain, it was not possible to inspect for one

OBSERVATIONS

Are there any other relevant observations pertaining to plant practices or environmental conditions that need to be addressed pursuant to the plant's Stormwater Pollution Prevention Plan? No

ACTIONS

Are there any actions recommended to enhance compliance with the requirements of the Stormwater permit or the plant's SPPP? _____

N/A

[Signature]

**ANTHONY TIMBERLANDS, INC.- MALVERN
ANNUAL COMPREHENSIVE SITE COMPLIANCE EVALUATION REPORT FORM**

Inspector: Wilson Anthony Date: 09/07/2021

Section I: Note any changes in site operations that have occurred since the previous inspection that have the potential to impact the facility's storm water runoff.

Inspection Area	Changes/modifications	Adequacy of BMPs	Corrective Action Taken
Log Yard	None	Adequate	N/A
Green Sawmill			
Sorter and Yard			
Planer Mill			
Shipping Area			
Boiler Room			
Shop Area			
Fueling Area			

Boiler #1 is down for repairs
Residuals will come down when
it comes back online.

Section IV: Evaluate the effectiveness of the existing Best Management Practices (BMPs).

BMP	Adequate?	Actions Required	Date
Housekeeping	Large piles of residuals throughout mill needs improvement.	N/A	N/A
Preventive Maintenance	Adequate		
Spill Prevention and Control			
Visual Inspections			
Employee Training			
Sediment and Erosion Control			
Management of Runoff			
Record Keeping			

Section V: Ensure that existing structural storm water control measures are operating properly.

Structural Control	Operating Properly?	Comments or Corrective Action	Date
Ditches are free of blockage	yes	N/A	N/A
Culverts are in good shape			
Fueling station mechanisms			
Separator/Clarifier			

QUARTERLY SITE INSPECTION REPORT
ANTHONY TIMBERLANDS, INC.- MALVERN
PERMIT NO: ARR00B476

Date: 06/10/2021

POTENTIAL POLLUTION SOURCES:

1. Storage of Boiler Fuel

Are Best Management Practices associated with storage of boiler fuel being followed? yes

Is runoff from fuel storage being directed to settling pond? yes

2. Fueling area

Is there any indication that fuel has been spilled in the process of operating the pumps? No

3. Petroleum Products

Where and how are petroleum products currently being stored? on concrete, under cover

Is there any indication that petroleum products have been allowed to enter a waste stream? No

4. Steam Cleaning

Is the product of equipment steam cleaning being processed through a clarifier? yes

Is the clarifier in good working order? yes

5. Residual Products

Are company policies for storing and loading developing residual products being followed? yes

6. Hydraulic Units

Are hydraulic units operating properly? yes

Is there any indication that hydraulic fluid is entering the waste stream? No

7. Outfall Clarifier

Is the clarifier in good operating condition? yes

If mill discharge being directed into the clarifier (if a discharge is occurring)? No discharge

FACILITY OUTFALL

At the time of inspection, was there a discharge of stormwater? No

If so, describe the appearance of the waste stream. N/A

PLANT INSPECTION

Was the plant inspected for the presence of any non-stormwater or process water discharge? yes

Was any such discharge identified? No

OBSERVATIONS

Are there any other relevant observations pertaining to plant practices or environmental conditions that need to be addressed pursuant to the plant's Stormwater Pollution Prevention Plan? N/A

ACTIONS

Are there any actions recommended to enhance compliance with the requirements of the Stormwater permit or the plant's SPPP? N/A

W. J. Smith

Appendix 5

Anthony Timberlands-Malvern
2021/2022
Stormwater Annual Report (SWAR)

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
STORMWATER ANNUAL REPORT (SWAR) FORM

SWAR APPENDIX ATTACHED.

☒ YES

☐ NO

PERMIT NUMBER: ARR008476 AFIN: 30-00084 INDUSTRIAL SECTOR: A1 REPORTING YEAR: 2021

PERMITTEE NAME: Anthony Timberlands, Inc FACILITY NAME: Anthony Timberlands

PHYSICAL ADDRESS: 930 Cobe St. CITY: Malvern

PARAMETER	BENCHMARK VALUE	QUALITY OR CONCENTRATION	UNITS	OUTFALL NUMBER	BENCHMARK EXCEEDED?
Total Suspended Solids (TSS)	100	<u><10</u>	mg/L	<u>001</u>	☐ YES** ☒ NO
pH	6.0-9.0	<u>6.9</u>	S.U.	<u>001</u>	☐ YES** ☒ NO

****If a benchmark is exceeded, a corrective action plan summary is required**

WAS SAMPLE TAKEN FROM THE OUTFALL OF A HOLDING POND OR BASIN? ☐ YES ☒ NO If NO, complete Storm Event Details below.

STORM EVENT DETAILS		COMMENTS:
DATE OF SAMPLED STORM EVENT	<u>12/06/21</u>	
ESTIMATE OF RAINFALL	<u>0.25</u> INCHES	
TIME SINCE LAST MEASURABLE EVENT	<u>15</u> DAYS	

Significant findings from evaluations or inspections: No

Corrective Action Plan (CAP) summary, including the status of any Corrective Actions not yet completed: N/A

***If additional room is needed, or additional parameters were monitored, attach SWAR Appendix, which may be found at the following web address:**

www.adeq.state.ar.us

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

Wilson Anthony 01/20/22
SIGNATURE & DATE

Wilson Anthony Director - Compliance
PRINTED NAME & TITLE OF OFFICIAL

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
STORMWATER ANNUAL REPORT (SWAR) FORM
SWAR APPENDIX

NOTE: THIS FORM CAN ONLY BE USED AS AN ATTACHMENT TO
THE SWAR FORM, NOT AS THE SOLE REPORTING FORM

PERMIT NUMBER: ARR008476 AFIN: 30-00084 INDUSTRIAL SECTOR: A1 REPORTING YEAR: 2021

PARAMETER	BENCHMARK VALUE	QUALITY OR CONCENTRATION	UNITS	OUTFALL NUMBER	BENCHMARK EXCEEDED?
COD	120	<10	mg/L	001	☐ YES** ☒ NO
Zinc	0.684	0.018	mg/L	001	☐ YES** ☒ NO
OTG	15	<5	mg/L	001	☐ YES** ☒ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO

****If a benchmark is exceeded, a
corrective action plan summary
is required**

WAS SAMPLE TAKEN FROM THE OUTFALL OF A HOLDING POND OR BASIN? ☐ YES ☒ NO If NO, complete Storm Event Details below.

STORM EVENT DETAILS		COMMENTS:
DATE OF SAMPLED STORM EVENT	<u>12/06/21</u>	
ESTIMATE OF RAINFALL	<u>0.25</u> INCHES	
TIME SINCE LAST MEASURABLE EVENT	<u>15</u> DAYS	

Significant findings from evaluations or inspections: NO

Corrective Action Plan (CAP) summary, including the status of any Corrective Actions not yet completed: NO

If additional room is needed or additional parameters were monitored, attach additional copies of the SWAR Appendix

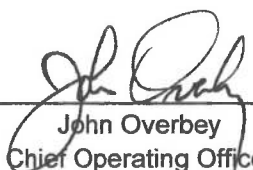


Anthony Timberlands, Inc.
ATTN: Mr. Steve Anthony
Post Office Box 137
Bearden, AR 71720

This report contains the analytical results and supporting information for the sample received on December 6, 2021. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Chief Operating Officer or a qualified designee.



John Overbey
Chief Operating Officer

This document has been distributed to the following:

PDF cc: Anthony Timberlands, Inc.
ATTN: Mr. Wilson Anthony
wanthony@anthonytimberlands.com

Anthony Timberlands, Inc.
ATTN: Mr. Steve Anthony
santhony@windstream.net



Anthony Timberlands, Inc.
Post Office Box 137
Bearden, AR 71720

SAMPLE INFORMATION

Project Description:

One (1) water sample(s) received on December 6, 2021
ATI - Malvern

Receipt Details:

A Chain of Custody was provided. The samples were delivered in one (1) ice chest.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

<u>Laboratory ID</u>	<u>Client Sample ID</u>	<u>Sampled Date/Time</u>	<u>Notes</u>
260897-1	001	06-Dec-2021 1400	

Case Narrative:

There were no qualifiers for this data and all samples met quality control criteria.

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).
"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.
"Standard Methods for the Examination of Water and Wastewaters", (SM).
"American Society for Testing and Materials" (ASTM).
"Association of Analytical Chemists" (AOAC).



Anthony Timberlands, Inc.
Post Office Box 137
Bearden, AR 71720

ANALYTICAL RESULTS

AIC No. 260897-1

Sample Identification: 001 06-Dec-2021 1400

Analyte		Result	RL	Units	Qualifier
COD		< 10	10	mg/l	
HACH 8000		Analyzed: 07-Dec-2021 1349 by 100		Batch: W77926	
Total Suspended Solids		< 10	10	mg/l	
USGS I 3765 85	Prep: 07-Dec-2021 1101 by 100	Analyzed: 07-Dec-2021 1557 by 100		Batch: W77919	
Zinc		0.018	0.01	mg/l	
EPA 200.7	Prep: 07-Dec-2021 1129 by 328	Analyzed: 08-Dec-2021 1043 by 328		Batch: S51925	
Oil and Grease		< 5	5	mg/l	
EPA 1664A	Prep: 08-Dec-2021 1610 by 348	Analyzed: 09-Dec-2021 1055 by 348		Batch: B12632	



Anthony Timberlands, Inc.
Post Office Box 137
Bearden, AR 71720

DUPLICATE RESULTS

Analyte	AIC No.	Result	RPD	RPD Limit	Preparation Date	Analysis Date	Dil	Qual
Total Suspended Solids	260902-1	< 10 mg/l			07Dec21 1101 by 100	07Dec21 1557 by 100		
	Batch: W77919 Duplicate	< 10 mg/l	0.00	20.0	07Dec21 1101 by 100	07Dec21 1557 by 100		

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
COD	100 mg/l	100	85.0-115			W77926		07Dec21 1349 by 100		
Total Suspended Solids	2000 mg/l	96.8	80.0-120			W77919	07Dec21 1101 by 100	07Dec21 1557 by 100		
Zinc	0.2 mg/l	102	85.0-115			S51925	07Dec21 1129 by 328	08Dec21 1021 by 328		
Oil and Grease	40 mg/l	90.5	78.0-114			B12632	08Dec21 1611 by 348	09Dec21 1055 by 348		
	40 mg/l	93.5	78.0-114	3.26	18.0	B12632	08Dec21 1611 by 348	09Dec21 1055 by 348		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
COD	260897-1	100 mg/l	98.5	80.0-120	W77926		07Dec21 1349 by 100		
	260897-1	100 mg/l	98.5	80.0-120	W77926		07Dec21 1349 by 100		
	Relative Percent Difference:		0.00	10.0	W77926				
Zinc	260895-1	0.2 mg/l	106	75.0-125	S51925	07Dec21 1129 by 328	08Dec21 1024 by 328		
	260895-1	0.2 mg/l	99.3	75.0-125	S51925	07Dec21 1129 by 328	08Dec21 1027 by 328		
	Relative Percent Difference:		6.44	20.0	S51925				

LABORATORY BLANK RESULTS

Analyte	Result	RL	LOQ	QC Sample	Preparation Date	Analysis Date	Qual
COD	< 9 mg/l	9	10	W77926-1		07Dec21 1349 by 100	
Total Suspended Solids	< 5 mg/l	5	5	W77919-1	07Dec21 1101 by 100	07Dec21 1557 by 100	
Zinc	< 0.007 mg/l	0.007	0.01	S51925-1	07Dec21 1129 by 328	08Dec21 1019 by 328	
Oil and Grease	< 2.0 mg/l	2.0	5	B12632-1	08Dec21 1611 by 348	09Dec21 1055 by 348	

CHAIN OF CUSTODY / ANALYSIS REQUEST FORM

PAGE 1 OF 1

Client: <u>Anthony Timberlands, Inc</u>			PO No.		NO OF BOTTLES	ANALYSES REQUESTED										AIC CONTROL NO: <u>26897</u>					
Project Reference: <u>ATI-Malvern</u>			SAMPLE MATRIX													AIC PROPOSAL NO:					
Project Manager: <u>W. Anthony</u>			G R A B	C O M P	W A T E R	S O I L	B O T T L E S	TSS	COD	BOD	25									Carrier:	
Sampled By: <u>W. Anthony</u>																				Received Temperature C <u>5.9</u>	
AIC No.	Sample Identification	Date/Time Collected																Remarks			
1	001	12/6/21 2PM	✓		✓		4	✓	✓	✓	✓							pH - 6.9			
			Container Type															Field pH calibration			
			Preservative															on _____ @ _____			
																		Buffer:			
			G = Glass NO = none		P = Plastic S = Sulfuric acid pH2		V = VOA vials N = Nitric acid pH2		H = HCl to pH2 B = NaOH to pH12		T = Sodium Thiosulfate Z = Zinc acetate		A = (NH4)2, NH4OH								
Turnaround Time Requested: (Please circle) <u>NORMAL</u> or EXPEDITED IN _____ DAYS							Relinquished By: <u>W. Anthony</u>			Date/Time: <u>12/6/21 430PM</u>			Received By:			Date/Time					
Expedited results requested by: _____							Relinquished By:			Date/Time			Received in Lab By: <u>[Signature]</u>			Date/Time: <u>12-6-21 1638</u>					
Who should AIC contact with questions: <u>Wilson Anthony</u>																					
Phone: <u>910-312-2414</u> Fax: _____																					
Report Attention to: <u>Wilson Anthony</u>																					
Report Address to: <u>wanthony@anthonytimberlands.com</u>																					

ARKANSAS DEPARTMENT OF ENERGY & ENVIRONMENT
STORMWATER ANNUAL REPORT (SWAR) FORM

SWAR APPENDIX ATTACHED?

☒ YES

☐ NO

PERMIT NUMBER: ARR005476 AFIN: 30-00084 INDUSTRIAL SECTOR: A1 REPORTING YEAR: 2022

PERMITTEE NAME: Anthony Timberlands, Inc

FACILITY NAME: ATI-Malvern

PHYSICAL ADDRESS: 930 Cobe St.

CITY: Malvern

PARAMETER	BENCHMARK VALUE	QUALITY OR CONCENTRATION	UNITS	OUTFALL NUMBER	BENCHMARK EXCEEDED?
Total Suspended Solids (TSS)	100	<u>69</u>	mg/L	<u>001</u>	☐ YES** ☒ NO
pH	6.0-9.0	<u>6.61</u>	S.U.	<u>001</u>	☐ YES** ☒ NO

If a benchmark is exceeded, a **corrective action plan summary is required

WAS SAMPLE TAKEN FROM THE OUTFALL OF A HOLDING POND OR BASIN?			☒ YES ☐ NO	If NO, complete Storm Event Details below.
STORM EVENT DETAILS		COMMENTS:		
DATE OF SAMPLED STORM EVENT				
ESTIMATE OF RAINFALL	INCHES			
TIME SINCE LAST MEASURABLE EVENT	DAYS			

Significant findings from evaluations or inspections: Added two new outfalls. Additionally, increased outflow of chlorite and created a small holding pond at outfall 001.

Corrective Action Plan (CAP) summary, including the status of any Corrective Actions not yet completed: see attached

*If additional room is needed, or additional parameters were monitored, attach **SWAR Appendix**, which may be found at the following web address:

www.adeg.state.ar.us

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

[Signature] 1/30/23

SIGNATURE & DATE

Wilson Anthony, Director of Reg Compliance
PRINTED NAME & TITLE OF OFFICIAL

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
STORMWATER ANNUAL REPORT (SWAR) FORM
SWAR APPENDIX

NOTE: THIS FORM CAN ONLY BE USED AS AN ATTACHMENT TO THE SWAR FORM, NOT AS THE SOLE REPORTING FORM

PERMIT NUMBER: ARR00

AFIN: 30-00084

INDUSTRIAL SECTOR: A1

REPORTING YEAR: 2022

PARAMETER	BENCHMARK VALUE	QUALITY OR CONCENTRATION	UNITS	OUTFALL NUMBER	BENCHMARK EXCEEDED?
COD	120	310	mg/L	001	☒ YES** ☐ NO
Zinc	0.654	0.12	mg/L	001	☐ YES** ☒ NO
OTG	15	14	mg/L	001	☐ YES** ☒ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO
					☐ YES** ☐ NO

**If a benchmark is exceeded, a corrective action plan summary is required

WAS SAMPLE TAKEN FROM THE OUTFALL OF A HOLDING POND OR BASIN? ☒ YES ☐ NO If NO, complete Storm Event Details below.

STORM EVENT DETAILS		COMMENTS:
DATE OF SAMPLED STORM EVENT		
ESTIMATE OF RAINFALL	INCHES	
TIME SINCE LAST MEASURABLE EVENT	DAYS	

Significant findings from evaluations or inspections: see first page

Corrective Action Plan (CAP) summary, including the status of any Corrective Actions not yet completed: see first page

If additional room is needed or additional parameters were monitored, attach additional copies of the SWAR Appendix

Malvern Corrective Action Plan

On 12/13/2022, Wilson Anthony, Director of Regulatory Compliance, obtained a stormwater discharge grab sample from Outfall 001 in accordance with the facility's Stormwater General Permit. Mr. Anthony submitted the grab sample to American Interplex Laboratories on 12/13/2022 and received the results of the sample on 12/22/2022.

The facility notes that results for Chemical Oxygen Demand (COD) the benchmark monitoring parameters in the Stormwater General Permit. Samples for Zinc, PH, and TSS were all in compliance with benchmark monitoring parameters. COD results are highly dependent on the housekeeping at the time of the rainfall event, the size of the rainfall event, and the amount of sediment that has been collected in the facility's clarifier. In order to reduce COD levels in future discharges, the facility has committed to removing organic matter from the first chamber of the clarifier on a more frequent basis and focusing on good housekeeping. The facility is also exploring stormwater controls which will re-route stormwater around the sawmill which contains the most sawdust/bark. Additionally, the facility is in the process of building a small holding pond at the outflow of the clarifier. Once completed, the facility plans to install an aerator.



Anthony Timberlands, Inc.
ATTN: Mr. Steve Anthony
Post Office Box 137
Bearden, AR 71720

This report contains the analytical results and supporting information for the sample received on December 13, 2022. Attached please find a copy of the Chain of Custody and/or other documents received. Note that any remaining sample will be discarded two weeks from the original report date unless other arrangements are made.

This report is intended for the sole use of the client listed above. Assessment of the data requires access to the entire document.

This report has been reviewed by the Chief Operating Officer or a qualified designee.

A handwritten signature in cursive script that reads 'Steve Bradford'. The signature is written in black ink and is positioned above a horizontal line.

Steve Bradford
Deputy Laboratory Director

This document has been distributed to the following:

PDF cc: Anthony Timberlands, Inc.
ATTN: Mr. Wilson Anthony
wanthony@anthonytimberlands.com

Anthony Timberlands, Inc.
ATTN: Mr. Steve Anthony
santhony@windstream.net



Anthony Timberlands, Inc.
Post Office Box 137
Bearden, AR 71720

SAMPLE INFORMATION

Project Description:

One (1) water sample(s) received on December 13, 2022
Malvern - Stormwater

Receipt Details:

A Chain of Custody was provided. The samples were delivered in one (1) ice chest.

Each sample container was checked for proper labeling, including date and time sampled. Sample containers were reviewed for proper type, adequate volume, integrity, temperature, preservation, and holding times. Any exceptions are noted below:

Sample Identification:

Laboratory ID	Client Sample ID	Sampled Date/Time	Notes
271432-1	001	13-Dec-2022 1530	

Case Narrative:

There were no qualifiers for this data and all samples met quality control criteria.

References:

"Methods for Chemical Analysis of Water and Wastes", EPA/600/4-79-020 (Mar 1983) with updates and supplements EPA/600/5-91-010 (Jun 1991), EPA/600/R-92-129 (Aug 1992) and EPA/600/R-93-100 (Aug 1993).
"Test Methods for Evaluating Solid Waste Physical/Chemical Methods (SW846)", Third Edition.
"Standard Methods for the Examination of Water and Wastewaters", (SM).
"American Society for Testing and Materials" (ASTM).
"Association of Analytical Chemists" (AOAC).



Anthony Timberlands, Inc.
Post Office Box 137
Bearden, AR 71720

ANALYTICAL RESULTS

AIC No. 271432-1

Sample Identification: 001 13-Dec-2022 1530

Analyte		Result	RL	Units	Qualifier
COD		310	10	mg/l	
HACH 8000		Analyzed: 15-Dec-2022 1109 by 100		Batch: W81718	
Total Suspended Solids		69	30	mg/l	
SM 2540 D 2015	Prep: 14-Dec-2022 1012 by 375	Analyzed: 14-Dec-2022 1629 by 375		Batch: W81698	
Zinc		0.12	0.01	mg/l	
EPA 200.7	Prep: 20-Dec-2022 1517 by 328	Analyzed: 21-Dec-2022 1524 by 328		Batch: S53571	
Oil and Grease		14	5	mg/l	
EPA 1664A	Prep: 21-Dec-2022 0959 by 375	Analyzed: 21-Dec-2022 1628 by 375		Batch: B13060	



Anthony Timberlands, Inc.
Post Office Box 137
Bearden, AR 71720

DUPLICATE RESULTS

Analyte	AIC No.	Result	RPD	RPD Limit	Preparation Date	Analysis Date	Dil	Qual
Total Suspended Solids	271421-1	< 10 mg/l			14Dec22 1012 by 375	14Dec22 1629 by 375		
	Batch: W81698 Duplicate	< 10 mg/l	0.00	20.0	14Dec22 1012 by 375	14Dec22 1629 by 375		

LABORATORY CONTROL SAMPLE RESULTS

Analyte	Spike Amount	%	Limits	RPD	Limit	Batch	Preparation Date	Analysis Date	Dil	Qual
COD	250 mg/l	99.2	85.0-115			W81718		15Dec22 1110 by 100		
Total Suspended Solids	2000 mg/l	88.6	80.0-120			W81698	14Dec22 1012 by 375	14Dec22 1629 by 375		
Zinc	0.2 mg/l	92.4	85.0-115			S53571	20Dec22 1515 by 328	21Dec22 1447 by 328		
Oil and Grease	40 mg/l	96.0	78.0-114			B13060	21Dec22 1000 by 375	21Dec22 1628 by 375		
	40 mg/l	87.5	78.0-114	9.26	18.0	B13060	21Dec22 1000 by 375	21Dec22 1628 by 375		

MATRIX SPIKE SAMPLE RESULTS

Analyte	Sample	Spike Amount	%	Limits	Batch	Preparation Date	Analysis Date	Dil	Qual
COD	271380-1	250 mg/l	101	80.0-120	W81718		15Dec22 1110 by 100		
	271380-1	250 mg/l	100	80.0-120	W81718		15Dec22 1110 by 100		
	Relative Percent Difference:		0.902	10.0	W81718				
Zinc	271562-1	0.2 mg/l	85.7	75.0-125	S53571	20Dec22 1515 by 328	21Dec22 1449 by 328		
	271562-1	0.2 mg/l	85.7	75.0-125	S53571	20Dec22 1515 by 328	21Dec22 1453 by 328		
	Relative Percent Difference:		0.00	20.0	S53571				

LABORATORY BLANK RESULTS

Analyte	Result	RL	LOQ	QC Sample	Preparation Date	Analysis Date	Qual
COD	< 8 mg/l	8	10	W81718-1		15Dec22 1110 by 100	
Total Suspended Solids	< 5 mg/l	5	5	W81698-1	14Dec22 1012 by 375	14Dec22 1629 by 375	
Zinc	< 0.005 mg/l	0.005	0.01	S53571-1	20Dec22 1515 by 328	21Dec22 1444 by 328	
Oil and Grease	< 2.0 mg/l	2.0	5	B13060-1	21Dec22 1000 by 375	21Dec22 1628 by 375	

9/2014

Appendix 6

Anthony Timberlands-Malvern Representative Waste Manifests



71580

Job # LR220263ERM

Box # 280483

NON-HAZARDOUS MANIFEST

Return to: RFR, UR, (S.74)

GENERATORGenerator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	35,320	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) Jack JonesSignature [Signature]

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) Brian MaynardAddress 7825 Fourche RDTruck Number 76Little Rock AR, 72209Truck Type Roll off

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature Brian Maynard Shipment Date 11-1-22Driver Signature Brian Maynard Delivery Date 11-1-22**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1802 East 91.35.4074 Level 120.130.18

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Brandy DuncanSignature Brandy Duncan Receipt Date 11-1-22

**NON-HAZARDOUS MANIFEST**

73820

Job # LR220263ERM

Box # 279788

Return to: RFR, UR, (Site)

GENERATORGenerator Anthony Timberlands IncAddress 930 CabeMalvern AR, 72104Phone Jim Jones 501-337-7551

AFE # _____

Well Number & Location Info _____

Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	19.6m	Y	CM
			39.320		

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) _____

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPAddress 7825 Fourche RD
Little Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

Driver Signature Brian Maynard Shipment Date 11-2-22Driver Name (Print) Brian Maynard

Truck Number _____

Truck Type Roll-off

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature Brian Maynard Delivery Date 11-2-22**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RD
Hazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51802 East 91.35.4074 Level 120.120 #18

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Sherry FuSignature Sherry FuReceipt Date 11/2/22

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA



NON-HAZARDOUS MANIFEST

Job#LR220263ERM

13900

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe , Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Creek Water with Hydraulic oil		R01591	5000	G	TT

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Richard Green

Truck Number 73

Truck Type TT

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature]
Driver Signature

11-3-22
Shipment Date

[Signature]
Driver Signature

11-3-22
Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34 S11802 East 91 3514874 Level 120-135 18

I hereby acknowledge receipt of the above-described materials.

Sherry Free
Name of Authorized Agent (Print)

[Signature]
Signature

11/8/22
Receipt Date



NON-HAZARDOUS MANIFEST

Job#LR220263ERM

72700

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>5000</u>	<u>G</u>	<u>TT</u>
			<u>17.12</u>		

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Richard Gress
Truck Number 23
Truck Type TT

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature]
Driver Signature

11-3-22
Shipment Date

[Signature]
Driver Signature

11-3-22
Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34 51.1802 East 91 35.4074 Level 120-130 18

I hereby acknowledge receipt of the above-described materials.

Sherry F...
Name of Authorized Agent (Print)

[Signature]
Signature

11/3/22
Receipt Date



NON-HAZARDOUS MANIFEST

47980

Job # LR220263ERM

Box # 280852

Return to: RFR, UR, (Site)

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	13,380	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print)

Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Brian Maynard
Truck Number _____
Truck Type Roll-off

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Brian Maynard 11-2-22
Driver Signature Shipment Date

Brian Maynard 11-2-22
Driver Signature Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34 51.1802 East 91 35.4014 Level 120, 130 18

I hereby acknowledge receipt of the above-described materials.

Sherry Fae
Name of Authorized Agent (Print)

[Signature] 11/3/2022
Signature Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA

**NON-HAZARDOUS MANIFEST**

56780

Job # LR220263ERM

Box # 11176783

Return to: RFR, UR, SFR

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	11 100 22.000	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Brian Maynard 11-4-22 Brian Maynard 11-4-22
Generator Authorized Agent Name (Print) Signature Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Brian Maynard
Truck Number _____
Truck Type Roll off

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

Brian Maynard 11-4-22
Driver Signature Shipment Date

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Brian Maynard 11-4-22
Driver Signature Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North _____ East _____ Level _____

I hereby acknowledge receipt of the above-described materials.

Sherry Fu
Name of Authorized Agent (Print)

[Signature] 11/4/22
Signature Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain



NON-HAZARDOUS MANIFEST

5040

Job # LR220263ERM

Box # 374659

Return to: RFR, UR, ETC

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	25,460	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print)

Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Brian Maynard
Truck Number _____
Truck Type Roll-off

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Brian Maynard 11-3-22
Driver Signature Shipment Date

Brian Maynard 11-3-22
Driver Signature Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34 51802 East 91 354074 Level 120-130 18

I hereby acknowledge receipt of the above-described materials.

Sherry Fu
Name of Authorized Agent (Print)

[Signature] 11/3/2022
Signature Receipt Date



NON-HAZARDOUS MANIFEST

Job # LR220263ERM

Box # RB34432RT

Return to: RFR, UR, Site

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	9.90	Y	CM
				19.800	
				19.800	

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

[Signature]
Driver Name (Print)

89
Truck Number

Pro
Truck Type

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature]
Driver Signature

11-8-22
Shipment Date

[Signature]
Driver Signature

11-8-22
Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34 51.1706 East 91 55.3905 Level 200-300 -18

I hereby acknowledge receipt of the above-described materials.

Sherry Fier
Name of Authorized Agent (Print)

[Signature]
Signature

11/8/22
Receipt Date



NON-HAZARDOUS MANIFEST

Job#LR220263ERM

54000

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>7,500</u> <u>3,000</u>	<u>G</u>	<u>TT</u>

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Joel Young
Truck Number 87
Truck Type VT

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature]
Driver Signature

11/10/22
Shipment Date

[Signature]
Driver Signature

11/10/22
Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34 51.1706 East 91 35.3905 Level 200 - 300 18

I hereby acknowledge receipt of the above-described materials.

Sherry Fan
Name of Authorized Agent (Print)

[Signature]
Signature

11/10/22
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain



Ticket
229579

61440

Job # LR220263ERM

Box #

NON-HAZARDOUS MANIFEST

Return to: RFR, UR, Site

GENERATOR

Generator Anthony Timberlands Inc

Address 930 Cabe

Malvern AR, 72104

Phone Jim Jones 501-337-7551

AFE #

Well Number & Location Info

Shipping Location Anthony Timberlands

Address 930 Cabe, Malvern AR, 72104

Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	25 Yards 264,560 lb	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP

Address 7825 Fourche RD

Little Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

Driver Signature

Shipment Date

Driver Name (Print)

Truck Number

Truck Type

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature

Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill

Address 1420 Hamric RD

Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34 S. 1706 East 91 35.3905 Level 200-300 18

I hereby acknowledge receipt of the above-described materials.

Sherry Fu
Name of Authorized Agent (Print)

Signature

Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA



Ticket 229599
NON-HAZARDOUS MANIFEST

55540 Job # *LR220263ERM*
Box # _____
Return to: *RFR, UR, Site*

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	<i>25 yds</i> <i>9.43</i> <i>18,860 P</i>	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jake Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Michael Lee
Truck Number 524
Truck Type R/O

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature

Shipment Date

[Signature]
Driver Signature

Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34 51.1706 East 91 35.3905 Level 200 - 300 18

I hereby acknowledge receipt of the above-described materials.

[Signature]
Name of Authorized Agent (Print)

[Signature]
Signature

11/15/22
Receipt Date



NON-HAZARDOUS MANIFEST

Job # LR220263ERM

Box # RB44713R7

Return to: RFR, UR, Site

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	25	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Michael Lee
Truck Number 524
Truck Type R/O

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature _____ Shipment Date _____

Michael Lee
Driver Signature _____ Delivery Date _____

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34.51.1704 East 91.35.3905 Level 200.300.18

I hereby acknowledge receipt of the above-described materials.

Branchy Duncan
Name of Authorized Agent (Print)

Branchy Duncan
Signature _____ Receipt Date 11-11-22

**NON-HAZARDOUS MANIFEST**

57480

Job # LR220263ERM

Box # 280952

Return to RFR, UR, Site**GENERATOR**

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	10.33	Y	CM
		201591 (NET)	20.660		

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)Signature [Signature]12-5-22
Delivery Date**TRANSPORTER**

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Brian Maynard
Truck Number 76
Truck Type Roll-off

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

Brian Maynard 12-6-22
Driver Signature Shipment Date

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Brian Maynard 12-6-22
Driver Signature Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34511780 East 91 35.3735 Level 380 - 400 18

I hereby acknowledge receipt of the above-described materials.

Sherry Fier
Name of Authorized Agent (Print)

[Signature]
Signature

12/6/22
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA



NON-HAZARDOUS MANIFEST

Job#LR220263ERM

81200

GENERATOR

Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe , Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Creek Water with Hydraulic oil		R01591	5000	G	TT

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)[Signature]
Signature12-6-22
Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LPDriver Name (Print) Jonathan MuthAddress 7825 Fourche RDTruck Number 63Little Rock AR, 72209Truck Type Tanker

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature] 12-6-22
Driver Signature Shipment Date[Signature] 12-6-22
Driver Signature Delivery Date

DESTINATION

Site Name Rolling Meadows LandfillAddress 1420 Hamric RDPhone Number 870-255-4001Hazen AR, 72064Disposal Location: North 34 S1.1780 East 91 35.385 Level 300 - 400 18

I hereby acknowledge receipt of the above-described materials.

Sherry Lee
Name of Authorized Agent (Print)[Signature]
Signature12-6-22
Receipt Date



NON-HAZARDOUS MANIFEST

Job # LR220263ERM

74060

GENERATOR

Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Creek Water with Hydraulic oil		R01591	5000 17.53	G	TT

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) Jack Jones

Signature _____

12-6-22

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LPDriver Name (Print) Richard GrayAddress 7825 Fourche RDTruck Number 73Little Rock AR, 72209Truck Type TT

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature _____

12-8-22
Shipment Date

Driver Signature _____

12-8-22
Delivery Date

DESTINATION

Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001

Disposal Location: North _____ East _____ Level _____

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Sherry Lee

Signature _____

12/8/22
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA



56920

Job # LR220263ERM

Box #

NON-HAZARDOUS MANIFEST

Return to: RFR, UR, Site

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	14520	YD	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

James W Jones JR
Generator Authorized Agent Name (Print)

Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Jonathan Mottz
Truck Number 63
Truck Type Double Reel

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature] 12-9-22
Driver Signature Shipment Date

[Signature] 12-9-22
Driver Signature Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34.51.1780 East 91.35.3755 Level 300.400.18

I hereby acknowledge receipt of the above-described materials.

Brandi D
Name of Authorized Agent (Print)

Brandi D 12-9-22
Signature Receipt Date

**NON-HAZARDOUS MANIFEST**Job # LR220263ER1Box # RB 34437RTReturn to: RFR, UR, Site**GENERATOR**Generator Anthony Timberlands IncAddress 930 CabeMalvern AR, 72104Phone Jim Jones 501-337-7551

AFE # _____

Well Number & Location Info _____

Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	28460 (25)	Y P (CY)	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) Jim JonesSignature [Signature]Delivery Date 12-5-22**TRANSPORTER**Transporter Name TAS Environmental Services LPAddress 7825 Fourche RDLittle Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

Driver Signature [Signature]Shipment Date 12-9-22Driver Name (Print) Jonathan MeekTruck Number 63Truck Type Double Axel

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature [Signature]Delivery Date 12-9-22**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1780 East 91.35.3735 Level 300.400.18

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Brandy DuncanSignature [Signature]Receipt Date 12-9-22



NON-HAZARDOUS MANIFEST

51440

Job # LR220263A

Box # 12B-32884

Return to: RFR, (UR), Site

GENERATOR

Generator Anthony Timberlands Inc

Address 930 Cabe

Malvern AR, 72104

Phone Jim Jones 501-337-7551

AFE # _____

Well Number & Location Info _____

Shipping Location Anthony Timberlands

Address 930 Cabe, Malvern AR, 72104

Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	16,200 25	Y CY	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

12-5-22
Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP

Address 7825 Fourche RD
Little Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

Brian Maynard
Driver Signature

12-19-22
Shipment Date

Driver Name (Print) Brian Maynard

Truck Number 89

Truck Type Roll off

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Brian Maynard
Driver Signature

12-19-22
Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill

Address 1420 Hamric RD

Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34.51.1797 East 91.35.3770 Level 300.400.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan
Name of Authorized Agent (Print)

Brandy Duncan
Signature

Receipt Date

**NON-HAZARDOUS MANIFEST**Job # LR220263ERM

52240

Box # 280483Return to: RFR, UR (Site)**GENERATOR**Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	16900 25	Y CY	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) Jim JonesSignature [Signature]Delivery Date 12-5-22**TRANSPORTER**Transporter Name TAS Environmental Services LPDriver Name (Print) Brian MaynardAddress 7825 Fourche RDTruck Number 89Little Rock AR, 72209Truck Type Roll off

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature Brian MaynardShipment Date 12-20-22Driver Signature Brian MaynardDelivery Date 12-20-22**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1797 East 91.35.3770 Level 300.400.18

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Brandy DuncanSignature Brandy DuncanReceipt Date 12-20-22



NON-HAZARDOUS MANIFEST

Job#LK220263ERM

57380

GENERATOR

Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Creek Water with Hydraulic oil		R01591	3000	G	TT

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) Jim JonesSignature [Signature]Delivery Date 12-6-22

TRANSPORTER

Transporter Name TAS Environmental Services LPDriver Name (Print) Brian MaynardTruck Number 87Address 7825 Fourche RD
Little Rock AR, 72209Truck Type Pump truck

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature Brian MaynardShipment Date 12-21-22Driver Signature Brian MaynardDelivery Date 12-21-22

DESTINATION

Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1797 East 91.35.3770 Level 300.400.18

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Brandy DuncanSignature Brandy DuncanReceipt Date 12-21-22

**NON-HAZARDOUS MANIFEST**

Job # LR220263ERN

Box # RB-35068 ✓

Return to: RFR, UR, 87e

GENERATORGenerator Anthony Timberlands IncAddress 930 CabeMalvern AR, 72104Phone Jim Jones 501-337-7551

AFE # _____

Well Number & Location Info _____

Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	25	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) Jim Jones

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPAddress 7825 Fourche RDLittle Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

Driver Signature Brian MaynardShipment Date 12-21-22Driver Name (Print) Brian MaynardTruck Number 89Truck Type Roll-off

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature Brian MaynardDelivery Date 12-21-22**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1797 East 91.35.3770 Level 300.400.

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Branchy Duncan

Signature _____

Receipt Date 12-21-22



NON-HAZARDOUS MANIFEST

Job#LR220263ERM

3000
5200

GENERATOR

Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>(2900)</u> <u>3000</u>	<u>G</u>	<u>TT</u>

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)Jim Jones
Signature

Delivery Date _____

TRANSPORTER

Transporter Name TAS Environmental Services LPDriver Name (Print) Chris JewellAddress 7825 Fourche RDTruck Number 87Truck Type VTLittle Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Chris Jewell
Driver Signature

Shipment Date _____

Driver Signature _____

Delivery Date _____

DESTINATION

Site Name Rolling Meadows LandfillAddress 1420 Hamric RDPhone Number 870-255-4001Hazen AR, 72064Disposal Location: North 34.51.1796East 91.35.3770Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan
Name of Authorized Agent (Print)Brandy D
Signature

Receipt Date _____

**NON-HAZARDOUS MANIFEST**Job # LR220263ERMBox # 274370Return to: RFR, UR, Site**GENERATOR**

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	20	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

Signature

1-9-23
Delivery Date**TRANSPORTER**

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Math Thine
Truck Number 76
Truck Type Roll off

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

Math Thine 1-9-23
Driver Signature Shipment Date

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Math Thine 1-9-22
Driver Signature Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34.51.1796 East 91.35.3770 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan
Name of Authorized Agent (Print)

Brandy Duncan 1-9-23
Signature Receipt Date



NON-HAZARDOUS MANIFEST

Job # LR220263ERM

Box # 1086917

Return to: RFR, UR, Site

GENERATOR

Generator Anthony Timberlands Inc

Address 930 Cabe

Malvern AR, 72104

Phone Jim Jones 501-337-7551

AFE # 1

Well Number & Location Info

Shipping Location Anthony Timberlands

Address 930 Cabe, Malvern AR, 72104

Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	20	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP

Address 7825 Fourche RD

Little Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

[Signature]
Driver Signature

1-9-23
Shipment Date

Driver Name (Print) Matt Thuc

Truck Number 76

Truck Type Roll off

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature]
Driver Signature

1-9-23
Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill

Address 1420 Hamric RD

Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34.51.1796

East 91.35.3770

Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan
Name of Authorized Agent (Print)

[Signature]
Signature

1-9-23
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

**NON-HAZARDOUS MANIFEST**Job # LR220263ERM

Box # _____

Return to: RFR, UR, Site**GENERATOR**Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	20.76	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) John E. EvansAddress 7825 Fourche RDTruck Number 53Little Rock AR, 72209Truck Type RLW BLACK

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

John E. Evans
Driver Signature

Shipment Date _____

John E. Evans
Driver Signature

Delivery Date _____

DESTINATIONSite Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1796East 91.35.3770Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Jim Jones Brandy Duncan
Name of Authorized Agent (Print)

Signature _____

Receipt Date 1-9-23

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

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Form # 308.WCA

Form # 308.WICA

**NON-HAZARDOUS MANIFEST**Job # LR220263ERN

Box # _____

Return to: RFR, U.R., Site**GENERATOR**Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	20.71	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) _____

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) Susan WoodbridgeAddress 7825 Fourche RDTruck Number 89Little Rock AR, 72209

Truck Type _____

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature [Signature] Shipment Date 1-9-23Driver Signature [Signature] Delivery Date 1-9-23**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1796 East 91.35.3770 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Brandy DuncanSignature [Signature] Receipt Date _____

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA



Job#LR220263ERM

NON-HAZARDOUS MANIFEST**GENERATOR**Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>5000</u>	<u>G</u>	<u>TT</u>

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Take Jones
Generator Authorized Agent Name (Print)

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) Richard BrainerTruck Number 73Truck Type TTAddress 7825 Fourche RD
Little Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Richard Brainer
Driver Signature1-10-23
Shipment DateRichard Brainer
Driver Signature1-10-23
Delivery Date**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1796 East 91.35.3770 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan
Name of Authorized Agent (Print)Signature Brandy Duncan1-10-23
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

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Form # 308.WCA



unloading
time in 2:30
time out 3:30pm

(T#)
231371

Job # LR220263ERM

Box # 224659

NON-HAZARDOUS MANIFEST

Return to: RFR, UR, Site

GENERATOR

Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104

Shipping Location Anthony Timberlands

Address 930 Cabe, Malvern AR, 72104

Phone Jim Jones 501-337-7551

Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	70	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

1-10-23
Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP

Driver Name (Print) Math Thune

Address 7825 Fourche RD

Truck Number 76

Little Rock AR, 72209

Truck Type Roll off

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Math Thune
Driver Signature

1-10-23
Shipment Date

Math Thune
Driver Signature

1-10-23
Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill

Address 1420 Hamric RD

Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34.51.1796

East 91.35.3770

Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan
Name of Authorized Agent (Print)

Brandy D
Signature

1-10-23
Receipt Date



NON-HAZARDOUS MANIFEST

Time in 9:30 AM
Time out 10:00 AM

Job # LR220263ERM

Box # RB35060RT

Return to: RFR, UR, Site
40,000 LB

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	20	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Matt Thue
Truck Number 76
Truck Type Roll off

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature] 1-10-23
Driver Signature Shipment Date

[Signature] 1-10-23
Driver Signature Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34.51.1796 East 91.35.3770 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan
Name of Authorized Agent (Print)

[Signature] 1-10-23
Signature Receipt Date



C3-626-22

Job # LR220263ERN

Box #

NON-HAZARDOUS MANIFEST

Return to: RFR, UR, Site

GENERATORGenerator Anthony Timberlands Inc

AFE #

Address 930 Cabe

Well Number & Location Info

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	15	X Ton	CM
			14.00		

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Adam Buchanan For Jim Jones

Generator Authorized Agent Name (Print)

Adam Buchanan

Signature

Delivery Date

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) Bradley VerselCole 3 ServicesTruck Number 3V-521Address 7825 Fourche RDTruck Type Roll-offLittle Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

01-10-2023

Driver Signature

Shipment Date

Bradley Versel

Driver Signature

01-10-2023

Delivery Date

DESTINATIONSite Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1796 East 91.35.3770 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan

Name of Authorized Agent (Print)

Brandy Duncan

Signature

1-10-23

Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

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Form # 308.WCA

**NON-HAZARDOUS MANIFEST**Job # LR220263ERM

Box # _____

Return to: RFR, U.R, Site**GENERATOR**Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	40.00	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) Jim Jones

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) John E. BARKSAddress 7825 Fourche RDTruck Number 82Little Rock AR, 72209Truck Type HW BLACK

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature _____

Shipment Date _____

Driver Signature _____

Delivery Date _____

DESTINATIONSite Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1746 East 91.35.3770 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Jim Jones Brandy D 1-10-23

Signature _____

Receipt Date _____

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA

**NON-HAZARDOUS MANIFEST**Job # LR220263ERN

Box # _____

Return to: RR, UR, Site**GENERATOR**Generator Anthony Timberlands Inc.

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	17.35	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) _____

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) Justin WaddellAddress 7825 Fourche RD
Little Rock AR, 72209Truck Number 89

Truck Type _____

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature [Signature]Shipment Date 1-10-23Driver Signature [Signature]Delivery Date 1-10-23**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1796 East 91.35.3770 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Brandy DuncanSignature [Signature]Receipt Date 1-10-23

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

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Form # 308.WCA

**NON-HAZARDOUS MANIFEST**Job # LR220263ERM

Box # _____

Return to: RFR, UR, Site**GENERATOR**Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	30.90	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) _____

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) JOHN EUBANKSAddress 7825 Fourche RD
Little Rock AR, 72209Truck Number 83Truck Type KW BLACK

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature

Shipment Date _____

Driver Signature

Delivery Date _____

DESTINATIONSite Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1796 East 91.35.3770 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print)

Signature

1-10-23

Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

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Form # 308.WCA

**NON-HAZARDOUS MANIFEST**Job # LR220263ERN

57400

Box # _____

Return to: RR, UR, Site**GENERATOR**Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	15.05	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) _____

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) Justin WoolbridgeAddress 7825 Fourche RD
Little Rock AR, 72209Truck Number 89

Truck Type _____

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Justin W.
Driver Signature1-10-23
Shipment DateJustin W.
Driver Signature1-10-23
Delivery Date**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1796 East 91.35.3770 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan
Name of Authorized Agent (Print)Brandy D.
Signature1-10-23
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA



NON-HAZARDOUS MANIFEST

Job#LR220263ERM

77500
40000

GENERATOR

Generator Anthony Timberlands Inc

Address 930 Cabe

Malvern AR, 72104

Phone Jim Jones 501-337-7551

AFE # _____

Well Number & Location Info _____

Shipping Location Anthony Timberlands

Address 930 Cabe , Malvern AR, 72104

Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>5000</u> <u>18.75</u>	<u>G</u>	<u>TT</u>

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP

Address 7825 Fourche RD

Little Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

[Signature]
Driver Signature

1-11-23
Shipment Date

Richard Greer
Driver Name (Print)

25
Truck Number

TT
Truck Type

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature]
Driver Signature

1-11-23
Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill

Address 1420 Hamric RD

Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North _____ East _____ Level _____

I hereby acknowledge receipt of the above-described materials.

Sherry En
Name of Authorized Agent (Print)

[Signature]
Signature

1/11/23
Receipt Date

**NON-HAZARDOUS MANIFEST**

GROSS: 42,700 LB

Job # LR220263ERM

Box # RB-44713RT

Return to: RFR, UR, Site

GENERATOR

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # 1
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	20	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

Signature

1-11-23
Delivery Date**TRANSPORTER**

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Math Thue
Truck Number 76
Truck Type Roll off

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Math Thue
Driver Signature1-11-23
Shipment DateMath Thue
Driver Signature1-11-23
Delivery Date**DESTINATION**

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North _____ East _____ Level _____

I hereby acknowledge receipt of the above-described materials.

Sherry Lee
Name of Authorized Agent (Print)

Signature

1/11/23
Receipt Date



NON-HAZARDOUS MANIFEST

Job # LR220263E

Box # R-250415

Return to: RFR, UR, Site

Gross wt. 40360LB

GENERATOR

Generator Anthony Timberlands Inc

Address 930 Cabe

Malvern AR, 72104

Phone Jim Jones 501-337-7551

AFE # 1

Well Number & Location Info

Shipping Location Anthony Timberlands

Address 930 Cabe, Malvern AR, 72104

Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	7.7	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

1-11-23
Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP

Address 7825 Fourche RD

Little Rock AR, 72209

Driver Name (Print) Matthew Thue

Truck Number 76

Truck Type Roll off

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

[Signature]
Driver Signature

1-11-23
Shipment Date

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature]
Driver Signature

1-11-23
Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill

Address 1420 Hamric RD

Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 3U 51.1796 East 91 35.3770 Level 400 500 18

I hereby acknowledge receipt of the above-described materials.

Sherry Fun
Name of Authorized Agent (Print)

[Signature]
Signature

1/11/23
Receipt Date



61,920

24500

Job # LR220263ERN

Box #

NON-HAZARDOUS MANIFEST

Return to: RFR, UR, Site

GENERATORGenerator Anthony Timberlands Inc

AFE #

Address 930 Cabe

Well Number & Location Info

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	18.71	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print)

Signature

Delivery Date

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) BuckAddress 7825 Fourche RDTruck Number 90Little Rock AR, 72209Truck Type Dump

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature

Shipment Date

Driver Signature Buck AegerDelivery Date 1-11-23**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34 51.1796 East 91 35.370 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Sherry LeeSignature Sherry LeeReceipt Date 1/11/23

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA



NON-HAZARDOUS MANIFEST

73360
34000

Job # LR220263ERN

Box #

Return to: RFR, UR, Site

GENERATOR

Generator Anthony Timberlands Inc

AFE #

Address 930 Cabe

Well Number & Location Info

Malvern AR, 72104

Shipping Location Anthony Timberlands

Address 930 Cabe, Malvern AR, 72104

Phone Jim Jones 501-337-7551

Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	19.68	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print)

Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP

Driver Name (Print) John Cubank

Address 7825 Fourche RD

Truck Number 83

Little Rock AR, 72209

Truck Type KW BLACK

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Driver Signature

Shipment Date

Driver Signature

Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill

Address 1420 Hamric RD

Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North 34 S. 196 East 91 35.3770 Level 400-500 18

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) Sherry

Signature

Receipt Date 11/11/23

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

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Form # 308.WCA



NON-HAZARDOUS MANIFEST

Job # LR220263ERN

Box # _____

Return to: RFR, UR, Site

GENERATOR

Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592		Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) _____

Signature _____

Delivery Date _____

TRANSPORTER

Transporter Name TAS Environmental Services LPDriver Name (Print) Justin WoldridgeAddress 7825 Fourche RDTruck Number 89Little Rock AR, 72209

Truck Type _____

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Justin W
Driver Signature1-11-23
Shipment DateJustin W
Driver Signature1-11-23
Delivery Date

DESTINATION

Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34 51.1796 East 91 35.3770 Level 400-500 18

I hereby acknowledge receipt of the above-described materials.

Sherry
Name of Authorized Agent (Print)Signature [Signature]1/11/23
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

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Form # 308.WCA



NON-HAZARDOUS MANIFEST

Job# LR220263 ERM

71500
48000

GENERATOR

Generator Anthony Timberlands Inc

Address 930 Cabe

Malvern AR, 72104

Phone Jim Jones 501-337-7551

AFE # _____

Well Number & Location Info _____

Shipping Location Anthony Timberlands

Address 930 Cabe, Malvern AR, 72104

Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>5000</u> <u>18.75</u>	<u>G</u>	<u>TT</u>

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP

Address 7825 Fourche RD

Little Rock AR, 72209

Driver Name (Print) Edward Green

Truck Number 23

Truck Type TT

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature]
Driver Signature

1-12-23
Shipment Date

[Signature]
Driver Signature

1-12-23
Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill

Address 1420 Hamric RD

Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North _____ East _____ Level _____

I hereby acknowledge receipt of the above-described materials.

Sherry Lee
Name of Authorized Agent (Print)

[Signature]
Signature

1/12/23
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA

**NON-HAZARDOUS MANIFEST**

Job#LR220263ERM

78260

GENERATORGenerator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>5,000</u>	<u>G</u>	<u>TT</u>

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) Chris JewellAddress 7825 Fourche RDTruck Number 73/726Little Rock AR, 72209Truck Type Daycab / Tanker

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Chris Jewell 1-13-23
Driver Signature Shipment DateChris Jewell 1-13-23
Driver Signature Delivery Date**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1796 East 91.35.3770 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan
Name of Authorized Agent (Print)Brandy Duncan 1-13-23
Signature Receipt Date

**NON-HAZARDOUS MANIFEST**

Job#LR220263ERM

77840

GENERATORGenerator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>5,000</u>	<u>G</u>	<u>TT</u>

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) Chris JewellAddress 7825 Fourche RDTruck Number 73/726Little Rock AR, 72209Truck Type Tanker

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Chris Jewell
Driver Signature1-13-23
Shipment DateChris Jewell
Driver Signature1-13-23
Delivery Date**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.1796 East 91.35.3776 Level 400.500.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan
Name of Authorized Agent (Print)Brandy Duncan
Signature

Receipt Date _____



NON-HAZARDOUS MANIFEST

77,920

GENERATOR

Generator Anthony Timberlands

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern, AR 72104

Shipping Location _____

Phone 501-337-7551

Address _____

Phone _____

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Creek Water with hydraulic oil		RO1591	5000	G	TT

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) _____

Signature _____

Delivery Date _____

TRANSPORTER

Transporter Name TAS Environmental

Driver Name (Print) Chris Jewell

Address 7825 Fourche Rd

Truck Number 73

Little Rock, AR 72209

Truck Type TT

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Chris Jewell 1-16-23
Driver Signature Shipment Date

Chris Jewell 1-16-23
Driver Signature Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill

Address 1420 Hamric Rd

Hazen, AR 72064

Phone Number 870-255-4001

Disposal Location: North _____ East _____ Level _____

I hereby acknowledge receipt of the above-described materials.

Sherry Lu
Name of Authorized Agent (Print)

Sherry Lu 1/16/23
Signature Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

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Form # 308.WCA



NON-HAZARDOUS MANIFEST

78,160

GENERATOR

Generator Anthony Timberlands

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern, AR 72104

Shipping Location _____

Phone 501-337-7551

Address _____

Phone _____

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with hydraulic oil</u>		<u>RO1591</u>	<u>5000</u>	<u>G</u>	<u>TT</u>

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Generator Authorized Agent Name (Print) _____

Signature _____

Delivery Date _____

TRANSPORTER

Transporter Name TAS Environmental

Driver Name (Print) Chris Jewell

Address 7825 Fourche Rd

Truck Number 73

Little Rock, AR 72209

Truck Type TT

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Chris Jewell 1-16-23
Driver Signature Shipment Date

Chris Jewell 1-16-23
Driver Signature Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill

Address 1420 Hamric Rd

Hazen, AR 72064

Phone Number 870-255-4001

Disposal Location: North _____

East _____

Level _____

I hereby acknowledge receipt of the above-described materials.

Sherry Lee
Name of Authorized Agent (Print)

[Signature]
Signature

1/16/23
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA

**NON-HAZARDOUS MANIFEST**Job # LR220263ERMBox # 280483Return to: RFR, UR, Site**GENERATOR**

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # 1
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Soil, Wood Chips and Debris with Hydraulic oil		R01592	25	Y	CM

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)Signature [Signature]

Delivery Date _____

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Richard Green
Truck Number 819
Truck Type PO

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

[Signature] 1-17-23
Driver Signature Shipment Date[Signature] 1-17-23
Driver Signature Delivery Date**DESTINATION**

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North _____ East _____ Level _____

I hereby acknowledge receipt of the above-described materials.

Name of Authorized Agent (Print) _____

Signature _____

Receipt Date _____

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA



NON-HAZARDOUS MANIFEST

Job# LR220263 ERM
18500pa
36200

GENERATOR

Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104

Shipping Location Anthony Timberlands

Address 930 Cabe , Malvern AR, 72104

Phone Jim Jones 501-337-7551

Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>5000</u>	<u>G</u>	<u>TT</u>

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

[Signature]
Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP

Driver Name (Print) Willie Hill

Address 7825 Fourche RD

Truck Number 73

Little Rock AR, 72209

Truck Type tanker

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Willie Hill
Driver Signature

1-17-23
Shipment Date

Willie Hill
Driver Signature

1-17-23
Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill

Address 1420 Hamric RD

Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North _____ East _____ Level _____

I hereby acknowledge receipt of the above-described materials.

Sharon Lee
Name of Authorized Agent (Print)

[Signature]
Signature

1/17/23
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

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Form # 308.WCA



5:30-3:30

Job#LR220263ERM

NON-HAZARDOUS MANIFEST**GENERATOR**Generator Anthony Timberlands IncAddress 930 CabeMalvern AR, 72104Phone Jim Jones 501-337-7551

AFE # _____

Well Number & Location Info _____

Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>5000</u>	<u>G</u>	<u>TT</u>
			<u>20.76</u>	<u>T</u>	

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPAddress 7825 Fourche RDLittle Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

Willie Hill
Driver Signature1-18-23
Shipment DateDriver Name (Print) Willie HillTruck Number 73Truck Type Truck

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Willie Hill
Driver Signature1-18-23
Delivery Date**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001

Disposal Location: North _____ East _____ Level _____

I hereby acknowledge receipt of the above-described materials.

Sherry Tu
Name of Authorized Agent (Print)

Signature _____

1/18/23
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA



530 - 3130

Job#LR220263ERM

NON-HAZARDOUS MANIFEST**GENERATOR**

Generator Anthony Timberlands Inc
Address 930 Cabe
Malvern AR, 72104
Phone Jim Jones 501-337-7551

AFE # _____
Well Number & Location Info _____
Shipping Location Anthony Timberlands
Address 930 Cabe, Malvern AR, 72104
Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>5000</u>	<u>G</u>	<u>TT</u>
			<u>21.16</u>	<u>ton</u>	

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

Signature

Delivery Date

TRANSPORTER

Transporter Name TAS Environmental Services LP
Address 7825 Fourche RD
Little Rock AR, 72209

Driver Name (Print) Willie Hill
Truck Number 73
Truck Type Tanker

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Willie Hill 1-18-23
Driver Signature Shipment Date

Willie Hill 1-18-23
Driver Signature Delivery Date

DESTINATION

Site Name Rolling Meadows Landfill
Address 1420 Hamric RD
Hazen AR, 72064

Phone Number 870-255-4001

Disposal Location: North _____ East _____ Level _____

I hereby acknowledge receipt of the above-described materials.

Sherry Lee
Name of Authorized Agent (Print)

[Signature] 1/18/23
Signature Receipt Date



Job#LR220263ERM

NON-HAZARDOUS MANIFEST**GENERATOR**Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
Creek Water with Hydraulic oil		R01591	5000	G	TT
			21.12	TDS	

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) Willie HillTruck Number 23Address 7825 Fourche RDTruck Type TankerLittle Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Willie Hill
Driver Signature1-18-23
Shipment DateWillie Hill
Driver Signature1-18-23
Delivery Date**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34 31.214 East 91 35.397 Level 300 - 400 18

I hereby acknowledge receipt of the above-described materials.

Sherry Free
Name of Authorized Agent (Print)

Signature _____

1/19/23
Receipt Date

White - Original

Canary - Disposer Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

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Form # 308.WCA



Job#LR220263ERM

NON-HAZARDOUS MANIFEST**GENERATOR**Generator Anthony Timberlands IncAddress 930 CabeMalvern AR, 72104Phone Jim Jones 501-337-7551

AFE # _____

Well Number & Location Info _____

Shipping Location Anthony TimberlandsAddress 930 Cabe, Malvern AR, 72104Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>5000</u>	<u>G</u>	<u>TT</u>
			<u>19.93</u>		

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones
Generator Authorized Agent Name (Print)

Signature _____

Delivery Date _____

TRANSPORTERTransporter Name TAS Environmental Services LPAddress 7825 Fourche RD
Little Rock AR, 72209

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

Willie Hill
Driver Signature1-18-23
Shipment DateDriver Name (Print) Willie HillTruck Number 73Truck Type Tanker

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Willie Hill
Driver Signature1-18-23
Delivery Date**DESTINATION**Site Name Rolling Meadows LandfillAddress 1420 Hamric RD
Hazen AR, 72064Phone Number 870-255-4001

Disposal Location: North _____ East _____ Level _____

I hereby acknowledge receipt of the above-described materials.

Sherry Fu
Name of Authorized Agent (Print)

Signature _____

1/19/23
Receipt Date



Job#LR220263ERM

NON-HAZARDOUS MANIFEST**GENERATOR**Generator Anthony Timberlands Inc

AFE # _____

Address 930 Cabe

Well Number & Location Info _____

Malvern AR, 72104Shipping Location Anthony TimberlandsAddress 930 Cabe , Malvern AR, 72104Phone Jim Jones 501-337-7551Phone Jim Jones 501-337-7551

Description of Waste Materials	Industrial Waste Code #	Profile Number	Total Quantity	Unit of Measure	Container Type
<u>Creek Water with Hydraulic oil</u>		<u>R01591</u>	<u>5000</u>	<u>G</u>	<u>TT</u>

I hereby certify that the above-described materials are not hazardous wastes as defined by 40 CFR, Part 261 or any applicable state law or regulation, have been fully and accurately described, classified and packaged, and are in proper condition for transportation according to applicable law and regulations.

Jim Jones

Generator Authorized Agent Name (Print)

Signature

Delivery Date

TRANSPORTERTransporter Name TAS Environmental Services LPDriver Name (Print) Willie HillAddress 7825 Fourche RDTruck Number 73Little Rock AR, 72209Truck Type Tanker

I hereby acknowledge receipt of the above-described materials for transport from the generator shipping location listed above.

I hereby acknowledge that the above-described materials were received from the generator shipping location and were transported without incident to the destination listed below.

Willie Hill

Driver Signature

1-20-23

Shipment Date

Willie Hill

Driver Signature

1-20-23

Delivery Date

DESTINATIONSite Name Rolling Meadows LandfillAddress 1420 Hamric RDHazen AR, 72064Phone Number 870-255-4001Disposal Location: North 34.51.2114 East 91.35.397 Level 300.400.18

I hereby acknowledge receipt of the above-described materials.

Brandy Duncan

Name of Authorized Agent (Print)

Brandy D

Signature

1-20-23

Receipt Date

White - Original

Canary - Dispose- Retain

Pink - Transporter Retain

Goldenrod - Generator Retain

www.northstarforms.com

Form # 308.WCA

Appendix 7

Anthony Timberlands-Malvern
Remediation and Maintenance Plan
prepared by ECCI
and
ADEQ Approval Letter



ARKANSAS

ENERGY & ENVIRONMENT

January 17, 2023

Wilson Anthony, Director of Regulatory Compliance
Anthony Timberlands, Inc.
P.O. Box 743
Malvern, AR 72104

Via email to: wanthony@anthonytimberlands.com

**Re: Anthony Timberlands, Inc. - Remediation and Maintenance Plan
Permit No. ARR00B476, AFIN 30-00084**

Dear Mr. Anthony:

The Division (DEQ) has reviewed your Remediation and Maintenance Plan for the above mentioned facility. Thank you for working with DEQ staff to address concerns in the various draft plans over the last months.

The Remediation and Maintenance Plan, as provided to our office January 10, 2023, is formally approved, with the understanding that sampling results and field observations may impact the implementation and execution of the plan. The plan remains subject to supplementation or amendment, as needed, as additional information is gathered. The supplementation or amendment may include, but not be limited to, additional water, soil, or sediment sampling, biological evaluation of impacted fish, mussels, and wildlife, and potentially different or additional remediation efforts.

As contemplated in subpart 9.0, *Ecological Considerations*, of the Remediation and Maintenance Plan, DEQ will facilitate further discussion with Arkansas Game and Fish Commission staff regarding biological evaluation of impacted fish, mussels, and wildlife.

Thank you for the efforts put forth to date on this issue and the additional efforts that will be needed as we proceed forward. If you have questions, or if you would like to discuss, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alan J. York'.

Digitally signed by Alan J. York
DN: cn=Alan J. York, o, ou,
email=alan.york@adeq.state.ar.
us, c=US
Date: 2023.01.17 13:33:47
-06'00'

Alan J. York
Associate Director
Office of Water Quality, Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR, 72118

cc: Electronic Filing (ARR00B476)
Stacie Wassell, Deputy Associate Director, Office of Water Quality
Bryan Leamons, Senior Operations Manager, Office of Water Quality

Tiana Toups (adpce.ad)

Subject: FW: Remediation and Maintenance Plan

From: Wilson Anthony [<mailto:WAnthony@anthonytimberlands.com>]

Sent: Tuesday, January 10, 2023 10:03 AM

To: Alan York (adpce.ad) <alan.york@adeq.state.ar.us>

Subject: RE: Remediation and Maintenance Plan

Mr. York,

I will have ECCI fix the typo and email you the updated copy later today. In regards to the MNA of the wetland area, I think the results from additional soil tests (probably next week) with all Plan parameters will be very helpful for future discussions regarding this area.

I am going to try and schedule a couple days next week for ECCI to sample the wetland area, residential properties in the proximate area of the release, and the area behind the waste pile. These are the areas that require some judgment in the area sampled, so I would like the DEQ to be present for these. I will be in contact over the next day or two regarding some dates next week that might work for a DEQ representative to accompany ECCI.

Feel free to give me a call or email me if any additional comments/questions are raised. Thanks!

Wilson Anthony
Director – Regulatory Compliance
Anthony Timberlands, Inc
(870) 313-4114

From: Alan York (adpce.ad) <alan.york@adeq.state.ar.us>

Sent: Tuesday, January 10, 2023 9:49 AM

To: Wilson Anthony <WAnthony@anthonytimberlands.com>

Subject: RE: Remediation and Maintenance Plan

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Mr. Anthony,

Our comments are very minor:

- Section 5.4 apparent typo - "In Figure 6..." we believe should read, "In Figure 5..."
- ATI is proposing MNA for the wetland area. Office of Land Resources (OLR) is sorting through the data provided of any samples for this identified area. We anticipate further discussion of this proposal based on review of the data, however this concern has previously been addressed in DEQ's response comment 15 in the 21st December letter to ATI. We anticipate any further discussion to be collaborative in nature.

Please feel free to contact me if you would like to discuss. I will attempt to get in front of my bosses asap regarding the status of the Remediation Plan and whether I may proceed with formal acceptance of the plan.

Thanks,

Alan J. York | Associate Director

Division of Environmental Quality | Office of Water Quality

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.683.6372 | e: Alan.York@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

From: Wilson Anthony [<mailto:WAnthony@anthonytimberlands.com>]

Sent: Monday, January 9, 2023 1:01 PM

To: Alan York (adpce.ad) <alan.york@adeq.state.ar.us>

Subject: Remediation and Maintenance Plan

Mr. York,

If you see anything in our Plan that you have a specific comment on, then please feel free to send me an email or give me a call. This will allow us to get the Plan turned around faster if there is anything that needs updating.

Thanks!

Wilson Anthony
Director – Regulatory Compliance
Anthony Timberlands, Inc
(870) 313-4114

Tiana Toups (adpce.ad)

Subject: Anthony Timberlands, Inc - Revised Remediation and Maintenance Plan 2 of 2
Attachments: Remediation and Maintenance Plan.pdf

From: Jeremy Stehle [<mailto:JStehle@ecci.com>]

Sent: Tuesday, January 10, 2023 2:20 PM

To: Alan York (adpce.ad) <alan.york@adeq.state.ar.us>

Cc: Wilson Anthony <WAnthony@anthonytimberlands.com>; Rod Breuer <RBreuer@ecci.com>; Penny Bray <PBray@ecci.com>; Garrett Mikel <GMikel@ecci.com>; Danna Ashley <DAshley@ecci.com>; Stacie Wassell (adpce.ad) <Stacie.Wassell@adeq.state.ar.us>

Subject: PRIVILEGED AND CONFIDENTIAL Anthony Timberlands, Inc - Revised Remediation and Maintenance Plan 2 of 2

Mr. York,

I have attached the revised Remediation and Maintenance Plan to fix the typo in in Section 5.4. The attachments and figures are not included in the attached file. If you need the attachments and figures resubmitted please let us know.

Thanks,

Jeremy Stehle
Senior Environmental Scientist
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Remediation and Maintenance Plan



Anthony Timberlands, Inc.

January 2023

Prepared by:



13000 Cantrell Road
Little Rock, Arkansas 72223
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Remediation and Maintenance Plan



Anthony Timberlands, Inc.

January 2023

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Attachment 1 – Data Collection Quality Assurance Plan (DCQAP)

Attachment 2 – Sample Analysis Reports

Attachment 3 – P.E Certified Clarifier Drawing

Figure 1 – Surface Water Sample Locations

Figure 2 – Facility Soil Sample Locations

Figure 3 – Oil Absorbent Boom Locations

Figure 4 – Area of Excavation of the Unnamed Tributary

Figure 5 - Wetland Area

Figure 6 – Excavated Area Between the Clarifier and Concrete Ditch

1.0 EXECUTIVE SUMMARY

This Remediation and Maintenance Plan (Plan) describes a series of water quality and soil tests that will be conducted by Anthony Timberlands, Inc. (ATI) that are designed to ensure that Town and Chatman Creek meet regulatory standards detailed in the following sections. Additionally, soil sampling will be conducted to assist in delineating the spill path and identify soils in need of remediation. ATI has included a summary of all water quality and soil analysis, and observations that have and will be conducted as described throughout the Plan in Table 1.1 below. ATI has collected samples at various locations and times previous to those discussed further in this plan. The sample analysis reports are included in Attachment 2.

Table 1.1 – Sample Events and Parameters (Locations are Described in Detail in Table 5.1)

November 14, 2022 Surface Water Samples		
Sample locations	SW 1, 3-6	
Sample Parameters		
BOD	Fluoride	Cobalt
COD	Chloride	Iron
TSS	Bromide	Manganese
DO	8260 VOCs	Nickel
pH	8270 SVOCs	Vanadium
O&G	Aluminum	Zinc
December 7, 2022 and December 15, 2022 Surface Water Samples		
Sample locations	SW 3, SW 4 Alternate, SW 5 and SW 6 Alternate and AT7	
Sample Parameters		
BOD	O&G	Cobalt
COD	Fluoride	Copper
TSS	Chloride	Iron
DO	Bromide	Lead
pH	Sulfate	Manganese
Hardness	Aluminum	Magnesium
Dissolved Organic Carbon	Arsenic	Nickel
Temperature	Cadmium	Vanadium
	Chromium	Zinc
Surface Water Samples (Three Dry Weather Conditions and Three Rain Event Samples)		
Sample locations	AT7, SW 2, SW 3, SW 4 Alternate, SW 5 and SW 6 Alternate	
Sample Parameters		
BOD	Chloride	Iron
COD	Bromide	Lead
TSS	Sulfate	Manganese
DO	Aluminum	Magnesium
pH	Arsenic	Mercury
Hardness	Barium	Nickel
Dissolved Organic Carbon	Cadmium	Selenium
Temperature	Chromium	Silver
O&G	Cobalt	Vanadium
Fluoride	Copper	Zinc

Table 1.1 – Sample Events and Parameters (Continued)

Soil Sampling (Onsite, Stream Bottom, Stream Bank, Wetland Area, and Adjacent Residential Property)		
Fluoride	Cobalt	Nickel
Chloride	Copper	Selenium
Bromide	Selenium	Silver
Sulfate	Silver	Vanadium
Aluminum	Iron	Zinc
Arsenic	Lead	TPH
Barium	Manganese	VOCs
Cadmium	Magnesium	SVOCs
Chromium	Mercury	
Twice Weekly Observations (To be Completed After the Three (3) Dry Weather and Three (3) Rainfall Event Samples have been Collected)		
Observation Locations	SW 2-3, SW 4 Alternate, SW 5, SW 6 Alternate and AT7	
In-situ Parameters		
DO	pH	Temperature

2.0 BACKGROUND

Anthony Timberlands Inc. (ATI) was notified in September 2022 of a release of unknown origins. The release of petroleum product and/or high oxygen demanding constituents impacted the unnamed tributary to Town Creek, Town Creek, and Chatman Creek. The Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) and the U.S. Environmental Protection Agency (EPA) identified ATI's Malvern facility as a responsible party (RP). Upon notification, ATI cooperated and coordinated with DEQ and EPA to quickly begin emergency response operations to recover free product and debris.

3.0 EMERGENCY RESPONSE

ATI contracted TAS Environmental Services, LP (TAS) for on-scene response. TAS mobilized and immediately placed oil absorbent booms and pads downstream of the facility. A vacuum truck was utilized to remove most of the liquid in ATI's concrete ditch immediately downstream of the facility. Clean sawdust was used to absorb the remaining liquid in the concrete ditch. The saturated material was then removed and

placed in roll-off containers for proper disposal. TAS also placed oil absorbent booms and pads in Town Creek in areas with free product and/or sheening.

The EPA met with ATI on October 17th and outlined an “area of concern” (AOC) where free product was observed. The AOC began at the unnamed tributary along Walco Road and ended shortly after the old railroad crossing on Town Creek. ATI coordinated with EPA to identify a scope of work to implement emergency response activities addressing the area of concern. TAS focused the cleanup on this area, and once most of the free product in Town Creek was removed, a four-inch diesel powered pump was used to create flow and push the remaining product to a collection point. TAS completed the removal of free product from the EPA identified area of concern by October 29th and began focus on sheen collection and removal by the use of oil booms throughout the area.

4.0 PURPOSE

Following the emergency response actions, DEQ requested ATI prepare a plan to address, if necessary, any residual free product, sheening, or oil residues and to temporarily sample for potential impacts to the area of release. ATI contracted ECCI to consult on additional response operations and to prepare the requested Remediation and Maintenance Plan. The following Remediation and Maintenance Plan is intended to outline the monitoring and, if necessary, additional remediation of downstream impacts to the unnamed tributary to Town Creek, Town Creek, and Chatman Creek. The remediation activities are intended to improve the current water quality of the unnamed tributary, Town Creek, and Chatman Creek back to the stream conditions prior to the release of petroleum products. The completion of this plan will be determined by ATI’s sampling and observations detailed within this document.

ATI will rely on the Arkansas Pollution Control and Ecology Commission (APC&EC) Rule 2, EPA Regional Screening Levels (RSLs) summary table, EPA Region 4 Ecological Screening Values (ESVs), and DEQ published guidance to set both numeric and narrative targets to determine end points for this plan. These numeric and narrative targets will apply to the Constituents of Concern (COCs) discussed in Section 5.2.2 and detailed below.

Rule 2 sets a narrative target for Oil and Grease (O&G) in section 2.410 as follows, “that oil, grease, or petrochemical substance shall not be present in receiving waters to the extent that they produce globules, other residue or any visible, colored film on the surface; coat the banks and /or bottoms of the waterbody; or adversely affect any of the aquatic biota.”

Rule 2 sets numeric targets for dissolved oxygen in both small and large watersheds. In the primary season a value of 5 mg/L is applicable. During the critical season a value of 3 mg/L is applicable. The value of 50 mg/L will be used for the COD target endpoint based on DEQ Guidance.

ATI will conduct surface soil sampling on the Malvern facility, specifically in areas down gradient of the wood waste pile. Soil samples will also be collected from downstream areas where surface water samples are also collected and areas identified as having potential impacts. Soils analysis will be compared to the EPA RSLs and ESVs to identify if further remediation is necessary.

The Scope of Work (SOW) sent to ATI by the EPA lists tasks necessary for proper cleanup. The list includes: recover free product, maintain boom and physical barriers and removing all oiled vegetation within the impacted area. ATI has removed much of the free product and is now in the maintenance phase of the removal. Booms have been deployed in the area of concern. The booms are inspected and replaced as needed. ATI has developed a plan to remove impacted soils from the streambed in the unnamed tributary to Town Creek from the Walco Bridge downstream to the culvert just prior to the confluence with Town Creek. Excavation equipment will utilize wood mats to access portions of the unnamed tributary. The mats will be removed when the excavation is complete. The area of the unnamed tributary where the work is planned is depicted in Figure 4.

The wetland area south of the unnamed tributary and west of the Walco Bridge has had some impacted soils and vegetation. ATI plans to harvest or remove vegetation that has been soiled with the oily residue from the release. This will take place during the dormant season and will involve cutting impacted undergrowth vegetation, leaving the root structure intact, and allowing it to revegetate naturally. Trees will not be cut in

the wetland area. Crews will use hand tools, (saws, axes, trimmers) to remove the vegetation. Heavy mechanized equipment will not be used in the wetland area.

5.0 SAMPLING AND ANALYSIS PLAN (SAP)

The SAP will explain sampling techniques, locations, and constituents in the subsequent portions of Section 5.

5.1 DATA COLLECTION QUALITY ASSURANCE PLAN (DCQAP)

The requisite DCQAP for activities described in this SAP is provided as Attachment 1 of this SAP. This document describes the methods by which environmental samples will be collected and analyzed. It also identifies the quality assurance procedures that will be utilized to ensure the accuracy of the field data.

5.2 SURFACE WATER SAMPLING TO ASSESS CURRENT SURFACE WATER QUALITY

This section provides a summary of the sampling and analysis activities that will be conducted to assess the current surface water quality of the watershed.

5.2.1 Sampling Locations

Sampling locations have been selected to identify the presence of constituents of concern (COC) noted in Section 5.2.2 below. Proposed locations are listed below in Table 5.1 and depicted in Figure 1. It should be noted that some sample locations may change due to ease of accessibility.

Table 5.1 Sample Locations

Sampling Location	Lat/Long
Town Creek Upstream of Cabe Ave (SW 1 US)	34°21'59.00" / 92°49'29.65"
Concrete Ditch (SW 2 CD) (Where stormwater flows into the concrete ditch from the clarifier)	34°21'41.76" / 92°49'28.69"
Rail Crossing Where Oil Accumulation Was Found (SW 3 TC)	34°21'42.30" / 92°50'12.24"
Mark Wallis' Property (SW 4 CC)	34°21'9.64" / 92°51'12.35"
SW 4 CC Alternate Chatman Creek Crossing on the Kenny Farber Property	34°21'10.04" / 92°51'2.06"
Grigsby Ford Road Bridge (SW 5 CC)	34°20'43.01" / 92°52'0.13"
Bridge at Danny Gregory's Property (SW 6 CC)	34°18'56.59" / 92°53'31.48"
SW 6 CC Alternate Chatman Creek near Ouachita River	34°19'11.27" / 92°53'21.27"
AT7 (Unnamed Tributary at the Walco Road Bridge).	34°21'44.59" / 92°49'40.31"

5.2.2 Constituents of Concern to be Analyzed

ATI has identified the primary COC as oil and grease (O&G). Additional COCs include RCRA 8 Metals, COD, and DO.

5.2.3 Surface Water Samples

ATI collected a set of samples on November 14, 2022 to assess if water quality had improved in the watershed. The samples were analyzed for the parameters in Table 5.2.

Table 5.2 November 14, 2022 Sample Parameters

Surface Water Sample Parameters – November 14, 2022 Sampling Event		
BOD	Fluoride	Cobalt
COD	Chloride	Iron
TSS	Bromide	Manganese
DO	8260 VOCs	Nickel
pH	8270 SVOCs	Vanadium
O&G	Aluminum	Zinc

DEQ supplied the parameter list in Table 5.3 below with the stated goal of determining the water quality of the impacted streams. DEQ requested for two (2) samples to be collected from the downstream locations labeled SW3, SW4 Alternate,

SW5, SW6 Alternate and AT7 with one being during dry weather and being within 24 hours of a 0.25-inch rain event. ATI notes that these sample were taken on 12/07/2022 and 12/15/2022.

Table 5.3 Sample Parameters December 7, 2022 and December 15, 2022

Surface Water Parameters		
BOD	Chloride	Iron
COD	Bromide	Lead
TSS	Sulfate	Manganese
DO	Aluminum	Magnesium
pH	Arsenic	Mercury
Hardness	Barium	Nickel
Dissolved Organic Carbon	Cadmium	Selenium
Temperature	Chromium	Silver
O&G	Cobalt	Vanadium
Fluoride	Copper	Zinc

5.2.4 Schedule of Future Sampling

Three (3) additional surface water samples will be analyzed for parameters listed in Table 5.3. The samples will be collected from sample locations AT7¹, SW3, SW4 Alternate, SW5, and SW6 Alternate. These samples will be taken during dry weather conditions. Additionally, three (3) water samples from the downstream locations (SW 2, AT7, SW3, SW4 Alternate, SW5, and SW6 Alternate) will be collected after measurable (0.25 in), rainfall events and analyzed for parameters listed in Table 5.3. Twice weekly visual inspections will also be conducted at the sampling locations with pH, DO, and temperature readings being taken as well.

^{1 1} ATI notes that AT7 is located in a stormwater ditch so there will be no flow during dry conditions. Analysis of these sample results should consider the fact that this will likely be stagnant water.

5.3 SOIL SAMPLING

This section provides a summary of the sampling and analysis activities that will be conducted to assess the current conditions of the soils on the facility and in the areas of concern downstream.

5.3.1 Soil Sampling on the ATI Facility

ATI will conduct surface soil sampling on the Malvern facility, specifically in areas down gradient of the wood waste pile. Ten (10) sample locations have been selected for the on-site surface soil samples. The proposed sample locations are depicted in Figure 2 and will be taken in consultation with a DEQ representative on-site. Soil samples will be analyzed for parameters listed in Table 5.3 applicable to soils, TPH, SVOCs and VOCs. If VOCs are non-detect for that sample, no additional VOCs will be required for that area during confirmation sampling. Results will be compared to RSL tables and ESVs.

5.3.2 Soil Sampling Downstream

In addition to the soil samples noted in Section 5.3.1, the facility will also take soil samples at the following downstream locations:

- Along the creek bank at SW3, SW4 Alternate, SW5, and SW6 Alternate
- In the creek bed at SW3, SW4 Alternate, SW5, and SW6 Alternate
- The wetland area south of the unnamed tributary. Sample locations will be chosen in consultation with a DEQ representative on-site.
- Residential properties in the proximate area of the release. These sample locations will be chosen in consultation with a DEQ representative on-site.

A map of all the downstream sample locations will be created after the locations are chosen. Soil samples will be analyzed for those parameters in Table 5.3 applicable to soils, TPH, and SVOCs and VOCs. Results will be compared to RSL tables and ESVs.

5.4 SOIL REMEDIATION

ATI has identified the following two areas as requiring soil remediation by means of excavation. These locations are shown below.

- 1) The unnamed tributary from the Walco bridge extending to the culvert at 34°21'49.05" N and - 92°49'50.90" that was discussed in Section 4.0. This area is depicted in Figure 4.
- 2) ATI facility between the clarifier and the concrete ditch. This area is depicted in Figure 5.

Once excavation has been completed, confirmation samples will be collected based on guidance provide by DEQ, one (1) sample every 20 linear feet along a linear spill path or five (5) samples every 400 square feet (one for each perimeter length and one floor) in nonlinear excavated areas will be collected. ATI will collect samples from known contaminated areas (wetland area and/or unnamed tributary) and analyze them for the parameters listed in Table 5.3 that are applicable to soils, TPH, SVOCs and VOCs. These test results will determine which parameters will be analyzed in the post-excavation confirmation samples. Once test results are known, this section will be updated with the chosen testing parameters. Results will be compared to RSL and ESVs to determine whether additional soil should be excavated.

In Figure 5, ATI has identified the wetland area south of the unnamed tributary described in Section 4.0. ATI proposes to let this area be remediated through monitored natural attenuation. ATI proposes to monitor this area quarterly for two years. Samples will be analyzed for VOCs, SVOCs and RCRA 8 Metals. After two years, a determination will be made about the effectiveness of MNA and the sampling schedule modified as needed.

Test results from locations noted in Sections 5.3 and 5.4 above will indicate whether additional soil remediation is necessary.

5.5 WASTE MANAGEMENT

Excavated soils removed during the remediation will be profiled and placed in roll off containers. Soils will be managed and disposed of in accordance with all applicable regulations. Soils will be removed from the site as soon as practicable, generally within 10 days.

6.0 ADDITIONAL TREATMENT AND CONTROLS

ATI is evaluating and will implement additional treatment and controls, as necessary, for the unnamed tributary to Town Creek, and Town and Chatman Creeks downstream of the facility.

6.1 UNNAMED TRIBUTARY TO TOWN CREEK, TOWN AND CHATMAN CREEKS TREATMENT AND CONTROLS

ATI will continue to maintain booms in the unnamed tributary, Town Creek and Chatman Creek downstream of the facility until such a time that all free product, visible sheening, and residue are removed. Boom locations are depicted in Figure 3. As discussed in section 5.5, ATI will excavate the unnamed tributary to Town Creek to remove sediment from the bottom that could cause future sheening. The location of the excavation of the unnamed tributary to Town Creek is found in Figure 4. The excavation will take place under US Army Nationwide Permit (NWP) 20. Additionally, a Short-Term Activity Authorization (STAA) will be obtained from DEQ.

ATI will respond to any reported instances of free product, visible sheening, or residue of the release.

6.2 FACILITY TREATMENT AND CONTROLS

In response to DEQ's initial notification and facility investigation, ATI also plans to implement additional on-site controls and treatment for stormwater, spills, drips, and non-stormwater process related wastewater.

ATI has placed a liner and booms under all the existing bulk storage tanks and booms around equipment reservoirs. The liner is rolled around oil absorbent booms to create a temporary containment area. ATI is in the process of ordering steel or concrete secondary containment for all existing oil storage tanks.

The facility has also made changes to address runoff from the wood waste pile around the pond as well. ATI constructed a drainage trench on the back side of the pile to capture stormwater and firefighting water. The trench is maintained by pumping any water captured directly to the log yard pond.

Finally, TAS, while completing emergency response activities, used a vacuum truck to remove free product from ATI's oil water separator (OWS) onsite. The sediment

in the OWS was removed and placed in a roll-off container for proper disposal, offsite. ATI has completed improvements to the clarifier by increasing the wall height of the final chamber and adding five 12-inch diameter outlet pipes in place where three 6-inch pipes were previously. This will significantly increase the flow potential and minimize the possibility of an overflow event. The P.E. certified plans are included in Attachment 3 and will also be included in the forthcoming NPDES permit application.

ATI has started the process of applying for an industrial wastewater discharge permit.

7.0 MAINTENANCE PLAN

The Maintenance Plan (MP) will address the methods of continued monitoring and collection of oil residue of the release, in-stream water quality assessment, and a schedule for the planned frequency of monitoring of Town and Chatman Creeks. During a meeting with DEQ staff on October 27, 2022, the Maintenance Plan was discussed and DEQ staff indicated that the end goal was to remove the visible oil sheen and oil residue from the downstream area of concern and to return the water quality to its condition prior to the release. Maintenance activities will continue until the narrative and numeric water quality standards established in Section 4.0 are met downstream.

7.1 WATER QUALITY ASSESSMENT

The downstream water quality will be assessed using dry weather and rain event sampling protocol. The dry weather sampling will be collected at least a week apart if no precipitation has occurred. The rain event sampling will include three rounds of sampling each after a measurable rainfall. The parameters for the both the dry weather and rain event sampling will be those listed in Table 5.3. The results of these samples will be compared to the numeric and narrative targets outlined in above in Section 4.0 to complete the water quality assessment. The stated goal of the assessment is to ensure water quality has returned to the conditions existing prior to the release of petroleum products in the unnamed tributary, Town Creek, and Chatman Creek.

7.2 METHODS OF CONTINUED MONITORING OF RESIDUE

ATI will continue to monitor the downstream areas for the presence of oil sheen and oil residue. Maintenance activities will continue to remove visible oil from the surface and the oil residue on the streambed substrate from downstream locations. ATI will contract with a third-party response company to conduct the on-going maintenance. The unnamed tributary will be inspected from the point where the clarifier discharge enters the ditch to the confluence of Town Creek. Town Creek will be inspected from the confluence of the unnamed tributary to the sampling location SW-3. The downstream sample locations along Town and Chatman Creeks will also be inspected twice per calendar week for a period of 90 days. Water quality parameters pH, DO, and temperature will be collected during these inspections. Oil absorbent booms and pads (as needed) will be utilized during the maintenance activities as well.

7.3 OIL OBSERVED ON THE SURFACE

Oil absorbent booms will be placed downstream of the facility to collect any oil residue that becomes mobilized during rain events. The booms will be securely installed and maintained. Oil absorbent pads will be utilized by ATI representatives, as needed, to actively remove the oil from the surface of the water as necessary.

7.4 OIL DEPOSITS ON STREAM BANKS AND BOTTOMS

Stream bottom sediment and stream bank soil samples will be collected at the surface water sample locations; SW-3, SW-4 Alternate, SW-5, and SW-6 Alternate. All soil samples will be analyzed for the parameters listed Table 5.3 applicable to soils, TPH, VOCs, and SVOCs. The concrete lined ditch, the unnamed tributary to Town Creek, Town Creek, and Chatman Creek will be monitored for oil residue deposited on the stream bottom. If ATI identifies oil residue on the streambed through visual observations during the inspections, then a vacuum truck will be utilized to remove such deposits provided they are in a well-defined and easily accessible area. If deposits are in an in-accessible area or a vacuum truck cannot effectively remove them, then deposits on stream bottoms will be left to remediate naturally. ATI will also make observations looking for migrations of the deposits into the accessible areas. ATI will contract with a third party to conduct the maintenance activities.

7.5 LOCATIONS

Locations of oil booms, downstream of the facility will be recorded with a GPS unit and the coordinates maintained on a map. These locations will be updated as necessary. See Figure 2 and table 7.1 for the current locations.

Table 7.1 Boom Locations

Boom Site	GPS Location
Boom Site UT 1 (Unnamed Tributary at Walco Road)	34°21'44.48 / 92°49'39.78
Boom Site UT 2 (Inlet to Wetland South Unnamed Tributary downstream from Walco Road Bridge)	34°21'44.80 / 92°49'44.18"
Boom Site UT 3 (Outlet of Wetland South of the Unnamed Tributary)	34°21'45.89 / 92°49'46.80
Boom Site UT 4 (Culvert between Walco Bridge and Confluence of Town Creek)	34°21'48.98" / 92°49'50.96"
Boom Site TC 5 (Confluence of the Unnamed Tributary and Town Creek)	34°21'50.75 / 92°49'51.98"
Boom Site TC 6 (Town Creek Upstream of the Railroad Bridge)	34°21'52.47 / 92°50'3.92
Boom Site TC 7 (Town Creek at the Railroad Bridge)	34°21'42.48 / 92°50'12.22
Boom Site CC 8 (Chatman Creek at Kenny Farber Property)	34°21'10.04" / 92°51'1.79"
Boom Site CC 9 (Grigsby Ford Road)	34°20'42.99 / 92°52'0.14
Boom Site CC 10 (Chatman Creek at the WWTP Bridge)	34°21'18.90 / 92°50'48.85

8.0 SCHEDULE OF MAINTENANCE ACTIVITIES

Maintenance activities such as deploying oil absorbent booms and pads are ongoing. Oil absorbent booms along the unnamed tributary to Town Creek, Town Creek, and Chatman Creek will be monitored and maintained on a weekly schedule.

The immediate and ongoing cleanup response is projected to stay at current levels until approval of this plan. At that point, a smaller field team will be in place to maintain oil absorbent booms.

8.1 SURFACE WATER SAMPLING

Upon approval of the Plan, ATI will begin to collect samples from the downstream sample locations (SW2, AT7, SW3, SW4 Alternate, SW5 and SW6 Alternate) after three different measurable (0.25 inches or greater) rain events. Samples will be analyzed for those parameters listed in Table 5.3. There will also be three (3) dry weather samples collected from the downstream sample locations (SW2, AT7, SW3, SW4 Alternate, SW5 and SW6 Alternate). Dry weather samples will be collected at least one week apart if

not rainfall occurs between events. Dry weather samples will also be analyzed for the parameters in Table 5.3.

8.2 SOIL SAMPLING

Upon approval of this plan soil sampling will be conducted on the ATI facility and at the downstream surface water locations. Soils from the stream banks and stream bottoms will be collected. Soils from residential properties in the proximate area of the release will also be collected. The soils will be analyzed for the parameters in Table 5.3 applicable to soils, TPH, VOCs, and SVOCs. The results will be compared with RSLs and ESVs. The soil sampling locations will be selected judgmentally by ATI and DEQ, with the exception of the locations where surface water will also be collected.

8.3 VISUAL INSPECTIONS

Twice weekly visual inspections for sheening and/or free product will occur at downstream of the ATI facility. The entire length of the unnamed tributary will be inspected. Town Creek from the confluence of the unnamed tributary to the rail road bridge will also be inspected. The surface water sample locations will also be inspected twice weekly. These inspections are scheduled to continue for three months. The schedule will be reevaluated after this time. DO, pH, and temperature will be recorded during each inspection.

9.0 ECOLOGICAL CONSIDERATIONS

ATI will have discussions with the Arkansas Game and Fish Commission (AGFC) regarding the necessity of a biological evaluation of fish and mussel populations in the affected area.

10.0 COMMUNITY AND ENGAGEMENT PLAN

ATI will send out a weekly summary of activities via email to all impacted downstream landowners who have been identified.

11.0 COMPLETION

After all sampling and visual observations described in the Plan are finished, ATI will submit a report detailing the work completed. The report will also compare the data collected to the numeric and narrative targets from Rule 2 discussed above in Section 4 and EPA RSL Tables. The report will also include a discussion of the water quality assessment conducted on the unnamed tributary, Town Creek and Chatman Creek. The report will make recommendations based on all of the data collected, the water quality assessment, if the narrative and numeric targets have been achieved, and on the need for any further actions.

Attachment 1
DATA COLLECTION QUALITY ASSURANCE PLAN (DCQAP)

Attachment 2
SAMPLE REPORTS

Attachment 3
P.E. STAMPED CLARIFIER DRAWING

FIGURE 1
SURFACE WATER SAMPLING LOCATIONS

FIGURE 2
SOIL SAMPLE LOCATIONS

FIGURE 3
OIL ABSORBENT BOOM LOCATIONS

FIGURE 4
EXCAVATION AREA OF THE UNNAMED TRIBUTARY

FIGURE 5
WETLAND AREA

FIGURE 6
EXCAVATION BETWEEN THE CLARIFIER AND THE CONCRETE DITCH