



# ConAgra Poultry Company

P. O. Box 1758

1902 South West Avenue - Complex Office

1810 South West Avenue - Plant

El Dorado, AR 71731-1758

870-863-1200



September 18, 1998

RECEIVED  
6674  
SEP 23 1998  
RECEIVED

John W. Lamb  
District Field Inspector  
Water Division  
Arkansas Department of Pollution Control and Ecology

Mr. Lamb,

Please allow me to respond to your letter written to me concerning the violations you found on August 5, 1998. The following action has been taken to correct the violations:

1. The barrels you referenced in your letter have been placed onto containment grids. The barrels stored on racks have drip containers under the valves.
2. The kerosene tank that needed containment has been removed from the property.
3. The two hydraulic tanks will have a containment pan constructed around them. This work will be completed before September 29, 1998.

I am confident that these measures will prevent violations in the future. I welcome your return to our facility to verify these actions.

Sincerely,

Todd McMahan  
Plant Operations Manger

TMCM:sw

NPDES COMPLIANCE FILES

AR0033723

CORRESPONDENCE  
 CRAS

GILBERT

25% COTTON

208



STATE OF ARKANSAS  
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 8913  
LITTLE ROCK, ARKANSAS 72219-8913  
PHONE: (501) 682-0656  
FAX: (501) 682-0910



August 18, 1998

Todd McMahan, Plant Manager  
Conagra Poultry  
1810 Southwest Ave.  
El Dorado, AR 71730

RECEIVED  
6425 \*  
AUG 27 1998  
685  
33723

Re: Industrial User Inspection

Dear Mr. McMahan:

On August 05, 1998, John Peppers, El Dorado Water Utilities and I performed an inspection of Conagra Wastewater Facility in accordance with the provisions of the federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

1. The facility need to improve its barrel storage around the back of of the facility. Several barrels were noted that needed to be placed in containment. Also some barrels on racks needed to have drip pans placed under the valve.
2. The facility had three petroleum based product tanks without containment. Two hydraulic tanks and one kerosene tank.

The above items require your immediate attention. Please submit a written response to these findings to the NPDES Enforcement Section of this Department when the violations have been corrected. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response is due by September 18, 1998. Violations of your pretreatment permit are subject to enforcement actions by this Department. Appropriate measures should be taken to eliminate or prevent the recurrence of such violations in the future.

If I can be any assistance, please contact me at 870-862-5941.

Sincerely,

*John W. Lamb*  
John W. Lamb  
District Field Inspector  
Water Division

cc: NPDES Branch

NPDES COMPLIANCE FILES  
NPDES # ARCO33723  
\_\_\_\_ DMR'S  
\_\_\_\_ NCR  
\_\_\_\_ CORRESPONDENCE  
\_\_\_\_ CRAS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Washington, D.C. 20460

# NPDES Compliance Inspection Report

Form Approved  
OMB No. 2040-0003  
Approval Expires 7-31-85

### Section A: National Data System Coding

Transaction Code			NPDES										yr/mo/day					Inspec. Type		Inspector		Fac Type						
N	2	5	3	A	R	0	0	3	3	7	2	3	11	12	9	8	0	8	0	5	17	18	I	19	C	20	2	
Remarks																												
Inspection Work Days						Facility Evaluation Rating						BI		QA		Reserved												
67						70	3	71	N	72	N	73				74												

### Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Conagra Poultry Processing Plant Southwest Ave El Dorado, Arkansas	Entry Time /Date 13:45	Permit Effective Date
	Exit Time/Date 15:52	Permit Expiration Date

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)  
Bill DeVault  
Todd McMahan, Plant Manager

Other Facility Data

Name, Address of Responsible Official/Title/Phone and Fax Number  
Todd McMahan/Plant Manager/870-863-1200  
1810 Southwest Ave.  
El Dorado, AR 71730

Contacted  
Yes  No

### Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

N	Permit	N	Flow Measurement	N	Operations & Maintenance	N	Sampling
N	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
N	Facility Site Review	N	Compliance Schedules	I	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	N	Storm Water	N	Other:

### Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

This inspection was done in response to a complaint against the facility. The complaint alleged that the facility was releasing odors from the facility. The inspection was part multimedia inspection of the Water and Air Divisions of this Department.

The facility operates a chicken processing plant in which that wastewater is generated and treated and discharged into the City of El Dorado's Sewer System. Wastewater is from two different waste streams. One stream is from the feather line where feathers are removed. The water is separated from the feathers and reused. The feathers are then used to make chicken food stock. The second stream is from the visceral line. The water from this line is separated from the viscera and then sent to the pretreatment plant. All water from the off loading area and fat storage area in collected and sent to the pretreatment plant. The City of El Dorado samples the plant daily and usually analyzes the samples once per week. The facility is then surcharged for excessive BOD demand.

The pretreatment plant consist of two DAF units. The solids from the DAF units are sent to the feather recycle line to be made into chicken feed stock.

At the time of the inspection no abnormal odors were noted from the pretreatment plant. The facility appeared well maintained and generally was "clean". No dead chickens or parts thereof were noticed. The only problems noted at the facility are listed on Attachment 1:

Name(s) and Signature(s) of Inspector(s) John Wesley Lamb 	Agency/Office/Telephone/Fax ADPCE/El Dorado/870-862-5941/870-862-3509	Date 09 December 1997
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date

NPDES Compliance Inspection Report  
Further ExplanationPage 1 of 1

## Section D

The facility could improve its barrel storage area. The facility had several barrels (some empty, some full) around the back of the facility. These barrels contain such things as insecticide, herbicide, and deodorizers. They were located near a road which is used for forklifts and trucks that recycle the grease. These barrels should be placed in containment. Also noted were some barrels that were being used and laying on a barrel rack. These barrels need to have drip pans placed under them to catch any drips from the valves placed in the barrel.

Most of the barrels are placed off the road in a safe area and contained, it would probably best to move all the above barrels to this location and contained.

The facility has three petroleum products tanks that should be placed in containment. The facility does have a nearby fueling station with adequate containment and an SPCC plan, however, one 750 gallon kerosene tank and two hydraulic oil tanks do not have containment around them.



POTW Pretreatment Program

Industrial Site Visit

Name of Industry: Conagra Processing Plant

Industry Contacts: Todd McMahan, Plant Manager

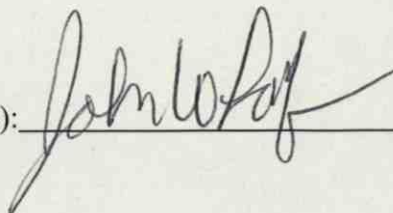
Type of Industry: processing live chickens

Date of Visit: 05 August 1998

- |   |   |  |   |
|---|---|--|---|
| 1. significant industrial user:                       | <input checked="" type="checkbox"/> yes | <input type="checkbox"/> no            | <input type="checkbox"/> not determined |
| 2. pretreatment equipment or procedures?              | <input checked="" type="checkbox"/> yes | <input type="checkbox"/> no            | <input type="checkbox"/> n/a            |
| 3. pretreatment equipment maintained and operational? | <input checked="" type="checkbox"/> yes | <input type="checkbox"/> no            | <input type="checkbox"/> n/a            |
| 4. hazardous waste generated or stored?               | <input type="checkbox"/> yes            | <input type="checkbox"/> no            | <input checked="" type="checkbox"/> n/a |
| 5. proper solid waste disposal?                       | <input type="checkbox"/> yes            | <input type="checkbox"/> no            | <input checked="" type="checkbox"/> n/a |
| 6. solvent management/tto control                     | <input type="checkbox"/> yes            | <input type="checkbox"/> no            | <input checked="" type="checkbox"/> n/a |
| 7. suitable sampling location?                        | <input checked="" type="checkbox"/> yes | <input type="checkbox"/> no            | <input type="checkbox"/> n/a            |
| 8. appropriate self-monitoring procedures/equipment?  | <input type="checkbox"/> yes            | <input type="checkbox"/> no            | <input checked="" type="checkbox"/> n/a |
| 9. adequate spill prevention?                         | <input type="checkbox"/> yes            | <input checked="" type="checkbox"/> no | <input type="checkbox"/> n/a            |
| 10. industry familiar with limits and requirements?   | <input checked="" type="checkbox"/> yes | <input type="checkbox"/> no            | <input type="checkbox"/> n/a            |

Additional Comments: \_

Visit Conducted by (signature):



Date: 09 December 1997