

ADEQ

ARKANSAS
Department of Environmental Quality

October 26, 2015

Tom Myers, Wastewater Superintendent
City of Siloam Springs
P.O. Box 80
Siloam Springs, AR 72761

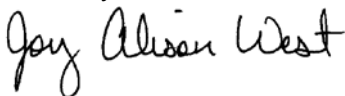
RE: City of Siloam Springs POTW Inspection
AFIN: 04-00106 Permit No.: AR0020273

Dear Mr. Myers:

On September 29, 2015, Matt Holden, District 1 Field Inspector, and I performed a Reconnaissance Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. On September 30, 2015, Mr. Holden and I conducted a follow-up inspection. A copy of the inspection report is enclosed for your records.

This case has been referred to the Water Division Enforcement Branch for review. If I can be of any assistance, please contact me at west@adeq.state.ar.us or 479.267.0811, ext. 12.

Sincerely,



Alison West
District 1 Field Inspector
Water Division

cc: Von Helmer, Oklahoma Department of Environmental Quality



AR KANSAS
Department of Environmental Quality

WATER DIVISION INSPECTION REPORT

AFIN: 04-00106	PERMIT #: AR0020273	DATE: 9/30/2015
COUNTY: 04 Benton	PDS #: 087321	MEDIA: WN
GPS LAT: N36.19285 LONG: W-94.56321 LOCATION: Entrance		

FACILITY INFORMATION	INSPECTION INFORMATION								
NAME: City of Siloam Springs POTW LOCATION: 975 Anderson CITY: Siloam Springs	FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 14939 S - State <hr/> FACILITY EVALUATION RATING: *** INSPECTION TYPE: Reconnaissance <hr/> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25%;">DATE(S): 9/30/2015</td> <td style="width: 25%;">ENTRY TIME: 14:25</td> <td style="width: 25%;">EXIT TIME: 15:45</td> <td style="width: 25%;">PERMIT EFFECTIVE DATE: 10/1/2007</td> </tr> <tr> <td>9/29/2015</td> <td>14:40</td> <td>15:40</td> <td>PERMIT EXPIRATION DATE: 9/30/2012</td> </tr> </table>	DATE(S): 9/30/2015	ENTRY TIME: 14:25	EXIT TIME: 15:45	PERMIT EFFECTIVE DATE: 10/1/2007	9/29/2015	14:40	15:40	PERMIT EXPIRATION DATE: 9/30/2012
DATE(S): 9/30/2015	ENTRY TIME: 14:25	EXIT TIME: 15:45	PERMIT EFFECTIVE DATE: 10/1/2007						
9/29/2015	14:40	15:40	PERMIT EXPIRATION DATE: 9/30/2012						
RESPONSIBLE OFFICIAL									
NAME / TITLE: Tom Myers / Wastewater Superintendent COMPANY: City of Siloam Springs MAILING ADDRESS: P.O. Box 80 CITY, STATE, ZIP: Siloam Springs AR 72761 PHONE & EXT. / FAX: 479-524-5623 / 479-524-4653 EMAIL: tmyers@siloamsprings.com	FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N <hr/> INSPECTION PARTICIPANTS NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Tom Myers/City of Siloam Springs Wastewater Superintendent								
CONTACTED DURING INSPECTION: Yes									
AREA EVALUATIONS									
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)									
** PERMIT	** FLOW MEASUREMENT								
** RECORDS/REPORTS	** LABORATORY								
** OPERATION & MAINTENANCE	** EFFLUENT/RECEIVING WATER								
** SAMPLING	** SLUDGE HANDLING/DISPOSAL								
** OTHER:	** STORMWATER								
	** FACILITY SITE REVIEW								
	** SELF-MONITORING PROGRAM								
	** PRETREATMENT								

General Comments

On September 29, 2015 at 12:24, I was notified by Tom Myers, City of Siloam Springs Wastewater Superintendent, that the wastewater treatment plant was experiencing an upset condition from an industrial user. Mr. Myers informed me that the plant had been nailed and the City believes the source is from Sager Creek Foods, Inc. ("Sager Creek Foods"). Mr. Myers stated that Sager Creek Foods had switched over to sweet potatoes and did not notify the City of issues with the industry's pretreatment. Mr. Myers stated that the effluent discharging at the City of Siloam Springs permitted outfall (Outfall 001) is opaque in color. The bacteria at the plant went from brown to black. Mr. Myers stated that he had been contacted by the Oklahoma Department of Environmental Quality (ODEQ) regarding a fish kill downstream of the plant at Arkansas' water quality monitoring station ARK0005 which is located in Oklahoma. Mr. Myers stated that he observed approximately 25 dead minnows at the bridge west of the facility (ARK0005). Mr. Myers stated that he was pumping bacteria from the aerobic digester to the Biological Nutrient Removal (BNR) Basin. In addition, the City had added another biological train to help with loading. I informed Mr. Myers to notify Richard Healey or Alan Anderson with ADEQ's Water Division Enforcement Branch of the upset at the wastewater treatment plant (See Attachment 1).

After speaking to Mr. Myers, Von Helmer, ODEQ, contacted me at 13:25 on September 29, 2015 in regards to the fish kill in Sager Creek. Mr. Helmer stated that the first Sager Creek bridge downstream of the plant (ARK0005) had a dissolved oxygen level of 0.9 mg/L according to the Oklahoma Department of Wildlife Conservation (ODWC) at approximately 10:00 to 10:15. At approximately 13:00, the ODWC rechecked the dissolved oxygen levels and received a 0.7 mg/L at ARK0005. Mr. Helmer stated that the ODWC had counted approximately 761 dead fish along a 70 meter stretch of Sager Creek.

On September 29, 2015 at 14:25, Inspector Matt Holden and I conducted a site investigation at the City's wastewater treatment plant. The wastewater was light gray in color and had a foul odor at the City's permitted outfall (Outfall 001). Sager Creek was clear upstream of Outfall 001. Dead fish and a foul odor were observed at the ARK0005. Using Google Earth, Outfall 001 is approximately 1345 feet from the Oklahoma state line. I recommended that Mr. Myers contact the Arkansas Game and Fish Commission (AGFC) due to the fish kill in Oklahoma. Per our conversation with Mr. Myers, it is my understanding that the City started to see an upset during the late evening on September 28, 2015. Dissolved Oxygen and pH analyses were conducted by Inspector Holden at Outfall 001 and ARK0005.

Outfall 001

Parameter	Sampling/Analysis Time	Analysis Result	Temperature-C°
D.O.	14:56	5.49 mg/L	26.6
D.O. Duplicate	14:57	5.43 mg/L	26.6
pH	15:01	7.75 s.u.	26.6
pH Duplicate	15:02	7.77 s.u.	26.5

ARK0005

Parameter	Sampling/Analysis Time	Analysis Result	Temperature-C°
D.O.	15:41	0.95 mg/L	24.1
pH	15:41	7.67 s.u.	24.0

On September 30, 2015, Inspector Holden and I conducted a follow-up inspection at the City's wastewater treatment plant and ARK0005. The City was still investigating to determine if Sager Creek Foods was responsible for the upset (See Attachment 1). The City was in the process of obtaining the last 3 weeks of influent received from Sager Creek Foods and Simmons Foods. The City's Pretreatment Program has 4 industrial users: Sager Creek Foods, Simmons Foods, Gates Rubber, and Cobb-Vantress. The City allows Sager Creek Foods to discharge 1.5 million gallons per day (MGD) to the City's wastewater treatment plant under the industrial user's pretreatment permit. Simmons Food discharges approximately 245,000 gallons per

day to the City. These two industries were being investigated more closely due to the Biochemical Oxygen Demand (BOD) loadings and volume of wastewater discharged to the City's wastewater treatment plant. The City was not accepting waste from Sager Creek Foods at the time of the investigation.

The actions taken by the City to correct this issue were as follows:

- Increased aeration and dissolved oxygen;
- Transferred 45,000 gallons of aerobic bugs from the aerobic digesters to the BNR Basin;
- Added second BNR train (City has 3 BNR trains) for longer detention time and to acclimate loadings. Each train has the capacity of 1.5 MGD;
- On September 29, 2015, the City notified Sager Creek Foods to stop discharging to the City's wastewater treatment plant;
- On September 29, 2015, the City was diverting influent to the 2.5 million gallon stormwater basin to reduce organic loading to the plant and help aid in recovery. On September 30, 2015, the City was not bypassing to the stormwater basin because they were almost to capacity;
- On September 29, 2015, the City began collecting 24 hour composite samples at Outfall 001 (See Attachment 1); and,
- The City had contacted the ADEQ Water Division Enforcement Branch and John Stein (AGFC).

On September 30, 2015, the upset was still occurring. The flow at Outfall 001 was greater due to not bypassing to the stormwater basin at the time of the inspection. The wastewater was light gray in color and had a foul odor at Outfall 001. Sager Creek was clear upstream of Outfall 001. Dead fish and a foul odor were observed at ARK0005. Dissolved Oxygen and pH analyses were conducted by Inspector Holden in Sager Creek upstream of Outfall 001, at Outfall 001, at Outfall 001 as the effluent entered Sager Creek, and at ARK0005. The results are noted below.

Sager Creek - Upstream of Outfall 001

Parameter	Sampling/Analysis Time	Analysis Result	Temperature-C°
D.O.	14:36	9.56 mg/L	20.8
pH	14:36	8.08 s.u.	20.7

Outfall 001

Parameter	Sampling/Analysis Time	Analysis Result	Temperature-C°
D.O.	14:28	5.20 mg/L	25.9
D.O. Duplicate	14:29	5.15 mg/L	25.7
pH	14:28	7.80 s.u.	25.6
pH Duplicate	14:29	7.83 s.u.	25.4

Outfall 001 as effluent entered Sager Creek

Parameter	Sampling/Analysis Time	Analysis Result	Temperature-C°
D.O.	14:39	6.33 mg/L	25.1
pH	14:39	7.95 s.u.	24.6

ARK0005

Parameter	Sampling/Analysis Time	Analysis Result	Temperature-C°
D.O.	15:38	0.93 mg/L	21.8
pH	15:38	7.67 s.u.	21.7

On September 30, 2015, I received the following email from Steve Gorszcyk, City of Siloam Springs Water/Wastewater Manager: "Tom and I will also be crafting a letter to Sager Creek on the pretreatment side of things regarding lack of notification when they realized they were having trouble with their treatment system. This would have allowed Tom the time to prepare the process for the shock. The letter will also be copied to the environmental manager with Del Monte.

According to our enforcement response plan, if the test results indicate that Sager Creek did cause the problems being experienced at the City's wastewater plant, we jump right into a show cause order."

On October 1, 2015, Mr. Myers emailed Alan Anderson and Miles Johnson, ADEQ Water Division Enforcement Branch the following: "Here attached is the data needed to show cause action against Sager Creek Foods. Their pretreatment permit allows a BOD of 375 mg/l. At their flow rate of 1.3 MGD and loading at 2,411 mg/l BOD listed in attached documents it would have overwhelmed the plant at 26,140 lbs/day. They ranged from 19,000 plus lbs/day to us for several days before we found out and shut their discharge off. This loading caused a pass through at Siloam Springs Wastewater Facility. Their pretreatment maximum allowable loading is 4,691 lbs/day. We are in discussion with legal counsel and will keep you advised of all actions." Please refer to Attachment 1.

Sager Creek Foods industrial user permit allows them to discharge wastewater to the City's wastewater treatment plant in which BOD levels should not exceed 900 mg/L Maximum Daily Limit and 375 mg/L Maximum Monthly Average (Attachment 2). A review of Sager Creek Foods analyses revealed the following (Attachment 3):

- On September 21, 2015, BOD analysis of the DAF effluent was 1790 mg/L;
- On September 23, 2015, BOD analysis of the DAF effluent was 1746 mg/L; and,
- On September 24, 2015, BOD analysis of the DAF effluent was 1913 mg/L.

On October 2, 2015, Inspector Holden and I collected water quality samples in Sager Creek upstream of Outfall 001, at Outfall 001, at Outfall 001 as the effluent entered Sager Creek, and at ARK0005. Sample analysis results can be found in the inspection report for October 2, 2015. However, all violations stemming from the inspections on September 29, September 30, and October 2, 2015 have been included in the Summary of Findings section of this inspection report.

On October 7, 2015, the City of Siloam Springs issued a Cease and Desist Order to Sager Creek Foods (Attachment 4).

A final report from ODEQ documenting the fish kill is pending.

Final effluent results will be reported on the monthly Discharge Monitoring Reports (DMR) and reviewed by the Water Division Enforcement Branch.

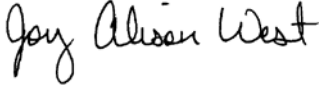

Summary of Findings

Placed waste in a location that has caused pollution to the waters of this State in violation of the Arkansas Water and Air Pollution Control Act-A.C.A §8-4-217(a)(1) and Regulation 2. Specifically, I noted the following:

- Total Dissolved Solids were 607 mg/L in Sager Creek downstream from Outfall 001. This is in violation of Regulation 2, Section 2.511(C).
- Distinctly visible solids were observed in Sager Creek downstream of the City of Siloam Springs Outfall 001. This is in violation of Regulation 2, Section 2.408 and Part I.A of the permit.
- Discharge from the City's permitted outfall was causing a visible increase in the stream turbidity which is in violation of the Arkansas Pollution Control and Ecology Commission Regulation No. 2, Section 2.503.
- Inadequate treatment at the POTW resulted in the decomposition of organic matter discharged into Sager Creek, thus causing Dissolved Oxygen levels at ARK0005 to fall below the primary and critical limits of 6.0 mg/L and 2.0 mg/L respectively, for the Ozark Highlands Region.

Table 1: ADEQ Sample Analysis Results for Dissolved Oxygen (mg/L)

	September 29, 2015	September 30, 2015	October 2, 2015
Siloam Springs Outfall 001	5.49	5.20	8.45
Sager Creek-Upstream of Outfall 001	No sample taken	9.56	10.60
Outfall 001 entering Sager Creek	No sample taken	6.33	8.56
ARK0005	0.95	0.93	4.98

INSPECTOR'S SIGNATURE: 	DATE: 10-15-2015
INSPECTOR'S SIGNATURE: -Alison West	
SUPERVISOR'S SIGNATURE: 	DATE: 10/16/2015
SUPERVISOR'S SIGNATURE: Jason Bolenbaugh	

Water Division Photographic Evidence Sheet

Location:	City of Siloam Springs POTW		
Photographer:	Alison West	Date:	9-29-2015
Time:	15:14	Witness:	Matt Holden
Photo #:	1	Description:	DSCN4862. Dark gray wastewater in anoxic/aerobic treatment in the Biological Nutrient Removal Number 1 Basin.



Photographer:	Alison West	Date:	9-29-2015
Time:	15:17	Witness:	Matt Holden
Photo #:	2	Description:	DSCN4869. Wastewater is turbid in final clarifiers.



Water Division Photographic Evidence Sheet

Location:	City of Siloam Springs POTW			
Photographer:	Alison West	Date:	9-29-2015	
Witness:	Matt Holden	Time:	14:54	
Description:	DSCN4840. Wastewater turbid in disinfection basin.		Photo #:	3



Photographer:	Alison West	Date:	9-29-2015	
Witness:	Matt Holden	Time:	14:54	
Description:	DSCN4841. Wastewater turbid in the reaeration basin prior to Outfall 001. Outfall 001 located by City of Siloam Springs employees.		Photo #:	4





Water Division Photographic Evidence Sheet

Location:	City of Siloam Springs POTW		
Photographer:	Alison West	Date:	9-29-2015
Witness:	Matt Holden	Time:	14:55
		Photo #:	5
Description:	DSCN4842. Turbid wastewater discharging at City's Outfall 001. Note accumulated solids in front of weir.		



Photographer:	Alison West	Date:	9-29-2015
Witness:	Matt Holden	Time:	15:10
		Photo #:	6
Description:	DSCN4851. Turbid effluent discharging from Outfall 001 into Sager Creek. Water upstream of Outfall 001 is clear.		



Water Division Photographic Evidence Sheet			
Location:	City of Siloam Springs POTW		
Photographer:	Alison West	Date:	9-29-2015
Time:	15:10	Witness:	Matt Holden
Photo #:	7	Description:	DSCN4853. Turbid effluent discharging from Outfall 001 into Sager Creek. Note solids in receiving stream.
			
Photographer:	Alison West	Date:	9-29-2015
Time:	15:37	Witness:	Matt Holden
Photo #:	8	Description:	DSCN4872. Turbid water downstream of Outfall 001 at ARK0005 bridge.
			

Water Division Photographic Evidence Sheet

Location:	City of Siloam Springs POTW				
Photographer:	Alison West	Date:	9-30-2015	Time:	14:29
Witness:	Matt Holden	Photo #:	9		
Description:	DSCN4881. Wastewater turbid in disinfection and reaeration basin.				



Photographer:	Alison West	Date:	9-30-2015	Time:	14:28
Witness:	Matt Holden	Photo #:	10		
Description:	DSCN4882. Wastewater turbid in the reaeration basin.				



Water Division Photographic Evidence Sheet

Location:	City of Siloam Springs POTW		
Photographer:	Alison West	Date:	9-30-2015
Time:	14:28	Witness:	Matt Holden
Photo #:	11	Description:	DSCN4883. Turbid wastewater discharging at the City's sampling location immediately following the chlorination/dechlorination basin.



Photographer:	Alison West	Date:	9-30-2015
Time:	14:39	Witness:	Matt Holden
Photo #:	12	Description:	DSCN4894. Turbid wastewater discharging at Outfall 001.



Water Division Photographic Evidence Sheet

Location:	City of Siloam Springs POTW		
Photographer:	Alison West	Date:	9-30-2015
Time:	14:34	Witness:	Matt Holden
Photo #:	13	Description:	DSCN4889. Turbid effluent discharging from Outfall 001 into Sager Creek. Water upstream of Outfall 001 is clear.



Photographer:	Alison West	Date:	9-30-2015
Time:	14:34	Witness:	Matt Holden
Photo #:	14	Description:	DSCN4890. Turbid effluent discharging from Outfall 001 into Sager Creek.

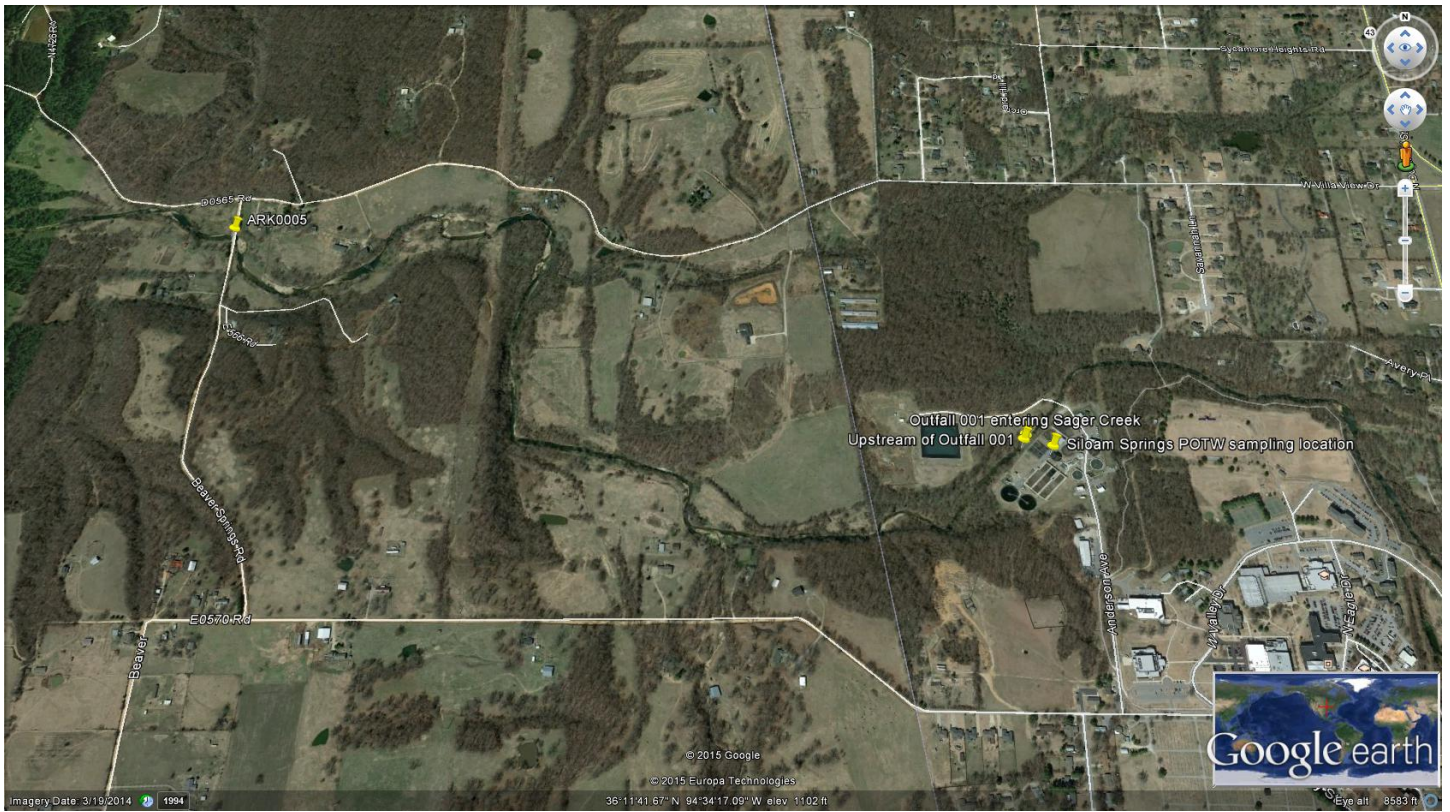


Water Division Photographic Evidence Sheet

Location:	City of Siloam Springs POTW				
Photographer:	Alison West	Date:	9-30-2015	Time:	15:38
Witness:	Matt Holden			Photo #:	15
Description:	DSCN4915. Turbid water downstream of Outfall 001 at ARK0005 bridge.				







ATTACHMENTS

- 1. City of Siloam Springs supplemental notification of upset to the Arkansas Department of Environmental Quality. Attachment includes 24 hour composite sample analysis collected on September 29, 2015 on effluent and influent for the City of Siloam Springs POTW. Process control analyses. And, sample analyses for pH and dissolved oxygen.**
- 2. Attachment includes City of Siloam Springs discharge limitations and self-monitoring requirements on Sager Creek Foods.**
- 3. Spreadsheet indicating flow and DAF effluent analyses except for pH, C.O.D., cyanide, oil and grease from Sager Creek Foods for September 2015. The attachment contains Sager Creek Foods effluent analyses for September 2015.**
- 4. Cease and Desist Order from City of Siloam Springs, AR to Sager Creek Foods.**

ATTACHMENT 1



October 8, 2015

Richard C. Healey
Enforcement Branch Manager
Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Via Overnight Delivery and Electronic Mail

Re: Supplemental Notification of Upset; NPDES Permit Number AR0020273

Dear Mr. Healey:

This letter is to provide information to supplement the City of Siloam Springs' prior verbal and written notices concerning the September 28, 2015 upset of the City Publicly-Owned Treatment Works (POTW). On September 29, 2015 the City's Wastewater Superintendent Tom Myers verbally notified Allison West of ADEQ that the City POTW was in upset conditions. At approximately 4:00pm on September 29, 2015 Mr. Myers notified Alan Anderson and Miles Johnson of ADEQ of an upset of the City's POTW. Mr. Myers telephoned Ms. West on October 1, 2015 at approximately 8:15am and 2:00pm with additional information regarding the upset. At my request, Mr. Myers provided email submissions to ADEQ as information became available concerning the upset. The email submissions are attached to this letter.

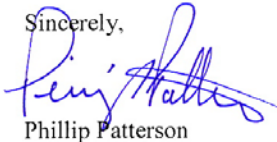
To confirm and supplement the information in the prior submittals, the NPDES noncompliance resulting from the upset was discharge of BOD, TSS, phosphorus and dissolved oxygen that did not meet NPDES permit effluent limitations. Attached is the laboratory analysis for a flow proportional composite sample of POTW effluent taken on September 29-30 showing the permit excursions. Also attached is a log recording effluent dissolved oxygen levels for the period September 26 through October 7. As depicted on the dissolved oxygen log, effluent dissolved oxygen returned to compliance with NPDES requirements on October 1. Through October 1 the City determined, through process control analyses for phosphorus, TSS, and COD, that POTW effluent had returned to compliance with NPDES requirements. The process control analyses logs are attached.

As we previously have notified ADEQ, the cause of the noncompliance has been determined to be excessive BOD loading at the POTW headworks. Analytical laboratory data for discharges to the POTW from Sager Creek Foods, Inc. on September 22 of 1790 mg/l, September 23 of 1746 mg/l and September 24 of 1913 mg/l demonstrate the high BOD loadings. The attached emails contain more information regarding the headworks loading. Please note that the attached October 1, 2015 email to Mr. Anderson and Mr. Johnson references Sager Creek Foods BOD loading of 2,411 which is a BOD value for the Sager Creek Foods lagoon. As provided to you on October 7, the City issued a Cease and Desist Order to Sager Creek Foods providing the conditions under which Sager Creek Foods may resume discharge to the POTW and come into compliance with pretreatment requirements.

Mr. Myers' email of September 30 (attached) provides information concerning the steps that the City took to immediately reduce and eliminate the noncompliance and mitigate the upset. On September 28 the City initiated operation of BNR treatment train 1 seeding it with bacteria and beginning to divert influent to BNR treatment train 1. On September 28 the City added bacteria to BNR treatment train 3 which was in upset in order to increase microbial activity and enhance recovery time for the BNR. On September 29-30 the City diverted a portion of headworks flow to the POTW storm water storage basin to reduce loading to the BNR processes. The influent stored in the storm water basin was bled into the BNR processes over a two day period and the storm water basin again is empty.

Please contact me at (479) 238-0907 or Steve Gorszczyk, Water/Wastewater Manager, at (479) 238-0921 if you would like additional information or to discuss any aspect of the upset.

Sincerely,



Phillip Patterson

City Administrator

Steven Gorszczyk

From: Tom Myers
Sent: Wednesday, September 30, 2015 4:25 PM
To: Anderson, Alan (ANDERSON@adeq.state.ar.us); JohnsonM@adeq.state.ar.us
Cc: Steven Gorszczyk; west@adeq.state.ar.us
Subject: Plant Up Set Siloam Springs Arkansas

Alan,

This is a follow up to our conversation yesterday regarding an upset at the Siloam Springs Wastewater Facility. We have been in contact with Alison West and Matt Holden ADEQ inspector's stationed in Fayetteville. We are trying to gather recent testing data from two major industrial wastewater dischargers. Both facilities are required to test weekly for B.O.D. an numerous other parameters. The major industrial dischargers are Sager Creek Foods and Simmons Foods which have pretreatment facilities.

We are investigating the source of the upset to wastewater plant. If we can determine the source we will take appropriate action against them.

In the mean time we immediately have taken steps at the wastewater plant to recover from this major upset. Diverted flow to storm basin soon as we found the plant failure to reduce loadings. Then added 45,000 gallons of bacteria to BNR process. Increased air viability to maximum allowable dissolved oxygen to BNR system and effluent Chlorine Contact Chamber prior to plant discharge. Sampled numerous location for process control help and collected an 24 hour flow proportional sample.

We notified regional ADEQ office in Fayetteville early Tuesday and your office.

It is my goal to have more information available to send you soon as possible.

Sincerely,

Thomas A. Myers
Wastewater Superintendent
City of Siloam Springs
Ph:479-524-5623
Cell:479-228-0934
tmyers@siloamsprings.com

Steven Gorszczyk

From: Tom Myers
Sent: Thursday, October 01, 2015 1:59 PM
To: Anderson, Alan (ANDERSON@adeq.state.ar.us); JohnsonM@adeq.state.ar.us
Cc: Steven Gorszczyk; west@adeq.state.ar.us
Subject: FW: Plant Up Set Siloam Springs Arkansas
Attachments: Sager Creek Foods Reports RE Wastewater Plant Upset.pdf

Alan,

Here attached is the data needed to show cause action against Sager Creek Foods. Their pretreatment permit allows a B.O.D. of 375 mg/l. At their flow rate of 1.3 MGD and loading at 2,411 mg/l B.O.D. listed in attached documents it would have overwhelmed the plant at 26,140 lbs/day. They ranged from 19,000 plus lbs/day to us for several days before we found out and shut their discharge off. This loading caused a pass through at Siloam Springs Wastewater Facility. Their pretreatment maximum allowable loading is 4,691 lbs/day.

We are in discussion with legal counsel and will keep you advised of all actions.

Sincerely,

Thomas A. Myers
Wastewater Superintendent
City of Siloam Springs
Ph:479-524-5623
Cell:479-228-0934
tmyers@siloamsprings.com

From: Tom Myers
Sent: Wednesday, September 30, 2015 4:27 PM
To: Anderson, Alan (ANDERSON@adeq.state.ar.us); 'JohnsonM@adeq.state.ar.us'
Cc: Steven Gorszczyk; west@adeq.state.ar.us
Subject: Plant Up Set Siloam Springs Arkansas

Alan,

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We notified regional ADEQ office in Fayetteville early Tuesday and your office.

It is my goal to have more information available to send you soon as possible.

Sincerely,

Thomas A. Myers
Wastewater Superintendent
City of Siloam Springs
Ph:479-524-5623
Cell:479-228-0934
tmyers@siloamsprings.com



Analytical Report

1702 East Central Avenue Suite 10
 Bentonville, AR 72712
 479-271-7996 phone
 479-271-8394 fax

10/06/15 15:43

Client:	City of Siloam Springs PO Box 80 Siloam Springs AR, 72761	Work Order:	B150140
		Project Name:	Effluent
		Project Number:	Effluent
Attn:	Tom Myers	Date Received:	09/30/15

Sample ID	Laboratory ID	Date and Time Sampled	Sampled By	Sample Type
Effluent	B150140-01	09/29/15 10:00 - 09/30/15 09:00	Jack Harrison	Composite
influent	B150140-02	09/29/15 10:00 - 09/30/15 09:00	Jack Harrison	Composite

Comments:

Samples were received into laboratory at a temperature of 4.00 °C

An executed copy of the chain of custody, the project quality control data, and the sample receipt form are also included as an addendum to this report. If you have any questions relating to this analytical report, please contact your Laboratory Project Manager at (479)271-7996. Any opinions, if expressed, are outside the scope of the laboratory's accreditation.

This report and any attachment(s) contains information from Environmental Testing Group, Inc ("ETG"), and is confidential and privileged. The information is intended for the use of the individual or entity named above. If you are not the intended recipient, be aware that any review, disclosure, printing, copying, distribution, retransmission, dissemination or other use of the information and/or contents of this message is prohibited. If you receive this message in error, please contact the sender immediately and delete any and all copies of this message from your computer(s).

These results relate only to the items tested. Estimated uncertainty is available upon request. This report has been electronically signed. Results are reported on a wet weight basis unless otherwise noted.

David D'Amico
 Laboratory Director



Analytical Report

1702 East Central Avenue Suite 10
 Bentonville, AR 72712
 479-271-7996 phone
 479-271-8394 fax

10/06/15 15:43

Client: City of Siloam Springs
 PO Box 80
 Siloam Springs AR. 72761
 Attn: Tom Myers

Work Order: B150140
 Project Name: Effluent
 Project Number: Effluent
 Date Received: 09/30/15

Environmental Testing Group

Chemistry Parameters by APHA/EPA Methods

Analytic	Result	Q	Units	PQL	Dil Factor	Analyzed Date/Time	Analyst	Method	Batch
B150140-01 (Water) Sampled: 09/30/15 09:00				Client Sample Name: Effluent					
Ammonia as N	0.272		mg/L	0.250	2.5	10/05/15 15:51	JCH	EPA 350.1	B5J0502
Carbonaceous BOD	37.0	G	"	1.00	1	09/30/15 14:30	JCH	SM 5210B CBOD	B5J3003
Nitrate Nitrogen	ND		"	0.200	"	10/02/15 16:52	JCH	[CALC]	[CALC]
Nitrate/Nitrite as N	ND		"	0.100	"	"	JCH	EPA 353.2	B5J0203
Nitrite as N	0.0487	J	"	0.100	"	09/30/15 22:20	JCH	"	B5J3008
Phosphorus, Total as P	1.73		"	0.0500	"	10/06/15 14:46	JCH	EPA 365.1	B5J0605
Total Suspended Solids	40.8		"	1.00	"	10/01/15 15:39	JSH	USGS 1-3765-85	B5J0102
B150140-02 (Water) Sampled: 09/30/15 09:00				Client Sample Name: influent					
Ammonia as N	22.4		mg/L	0.500	5	10/05/15 15:51	JCH	EPA 350.1	B5J0502
Biochemical Oxygen Demand	315		"	1.00	1	09/30/15 14:30	JCH	SM 5210B	B5J3003
Nitrate Nitrogen	ND		"	0.200	"	10/02/15 16:52	JCH	[CALC]	[CALC]
Nitrate/Nitrite as N	0.102		"	0.100	"	"	JCH	EPA 353.2	B5J0203
Nitrite as N	0.0449	J	"	0.100	"	09/30/15 22:20	JCH	"	B5J3008
Phosphorus, Total as P	4.75		"	0.500	10	10/06/15 14:46	JCH	EPA 365.1	B5J0605
Total Suspended Solids	194		"	1.00	1	10/01/15 15:39	JSH	USGS 1-3765-85	B5J0102

Environmental Testing Group

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Analytical Report

1702 East Central Avenue Suite 10
 Bentonville, AR 72712
 479-271-7996 phone
 479-271-8394 fax

10/06/15 15:43

Client: City of Siloam Springs
 PO Box 80
 Siloam Springs AR. 72761
 Attn: Tom Myers

Work Order: B150140
 Project Name: Effluent
 Project Number: Effluent
 Date Received: 09/30/15

Chemistry Parameters by APHA/EPA Methods - Quality Control
Environmental Testing Group

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B513003 - Wet Prep										
Blank (B513003-BLK1)				Prepared & Analyzed: 09/30/15						
Biochemical Oxygen Demand	ND	1.00	mg/L							
Carbonaceous BOD	ND	1.00	"							
LCS (B513003-BS1)				Prepared & Analyzed: 09/30/15						
Biochemical Oxygen Demand	226		mg/L	198		114	84.6-115.4			
Carbonaceous BOD	220		"	198		111	84.6-115.4			
Duplicate (B513003-DUP1)				Source: B150122-01 Prepared & Analyzed: 09/30/15						
Biochemical Oxygen Demand	289	1.00	mg/L		315			8.61	15	
Duplicate (B513003-DUP2)				Source: B150135-01 Prepared & Analyzed: 09/30/15						
Biochemical Oxygen Demand	352	1.00	mg/L		360			2.25	15	
Batch B513008 - Wet Prep										
Blank (B513008-BLK1)				Prepared & Analyzed: 09/30/15						
Nitrite as N	ND	0.100	mg/L							
LCS (B513008-BS1)				Prepared & Analyzed: 09/30/15						
Nitrite as N	8.010	0.100	mg/L	8.00		100	90-110			
Matrix Spike (B513008-MS1)				Source: B150140-01 Prepared & Analyzed: 09/30/15						
Nitrite as N	4.000	0.100	mg/L	4.00	0.04870	98.8	90-110			
Matrix Spike Dup (B513008-MSD1)				Source: B150140-01 Prepared & Analyzed: 09/30/15						
Nitrite as N	4.020	0.100	mg/L	4.00	0.04870	99.3	90-110	0.499	3.20	

Environmental Testing Group

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10/06/15 15:43

Client: City of Siloam Springs
 PO Box 80
 Siloam Springs AR, 72761

Work Order: B150140
 Project Name: Effluent
 Project Number: Effluent

Attn: Tom Myers

Date Received: 09/30/15

Chemistry Parameters by APHA/EPA Methods - Quality Control

Environmental Testing Group

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B5J0102 - Wet Prep										
Blank (B5J0102-BLK1) Prepared & Analyzed: 10/01/15										
Total Suspended Solids	ND	1.00	mg/L							
Blank (B5J0102-BLK2) Prepared & Analyzed: 10/01/15										
Total Suspended Solids	ND	1.00	mg/L							
LCS (B5J0102-BS1) Prepared & Analyzed: 10/01/15										
Total Suspended Solids	39.3	1.00	mg/L	40.0		98.2	80-120			
LCS Dup (B5J0102-BSD1) Prepared & Analyzed: 10/01/15										
Total Suspended Solids	39.2	1.00	mg/L	40.0		98.0	80-120	0.255	20	
Duplicate (B5J0102-DUP1) Source: B150115-01 Prepared & Analyzed: 10/01/15										
Total Suspended Solids	1190	1.00	mg/L		1260			5.71	21.9	
Duplicate (B5J0102-DUP2) Source: B150124-01 Prepared & Analyzed: 10/01/15										
Total Suspended Solids	194	1.00	mg/L		198			2.04	21.9	
Duplicate (B5J0102-DUP3) Source: B150137-01 Prepared & Analyzed: 10/01/15										
Total Suspended Solids	62.0	1.00	mg/L		58.0			6.67	21.9	
Duplicate (B5J0102-DUP4) Source: BJ50005-01 Prepared & Analyzed: 10/01/15										
Total Suspended Solids	48.0	1.00	mg/L		48.0			0.00	21.9	
Batch B5J0203 - Wet Prep										
Blank (B5J0203-BLK1) Prepared & Analyzed: 10/02/15										
Nitrate Nitrite as N	ND	0.100	mg/L							

Environmental Testing Group

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10/06/15 15:43

Client: City of Siloam Springs
 PO Box 80
 Siloam Springs AR, 72761
 Attn: Tom Myers

Work Order: BI50140
 Project Name: Effluent
 Project Number: Effluent
 Date Received: 09/30/15

Chemistry Parameters by APHA/EPA Methods - Quality Control
 Environmental Testing Group

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B5J0203 - Wet Prep										
LCS (B5J0203-BS1)				Prepared & Analyzed: 10/02/15						
Nitrate/Nitrite as N	8.04	0.100	mg/L	8.00		100	90-110			
Matrix Spike (B5J0203-MS1)				Source: BI50129-01 Prepared & Analyzed: 10/02/15						
Nitrate/Nitrite as N	9.73	0.100	mg/L	4.00	6.06	91.7	90-110			
Matrix Spike Dup (B5J0203-MSD1)				Source: BI50129-01 Prepared & Analyzed: 10/02/15						
Nitrate/Nitrite as N	9.72	0.100	mg/L	4.00	6.06	91.5	90-110	0.103	10	
Batch B5J0502 - Wet Prep										
Blank (B5J0502-BLK1)				Prepared & Analyzed: 10/05/15						
Ammonia as N	ND	0.100	mg/L							
LCS (B5J0502-BS1)				Prepared & Analyzed: 10/05/15						
Ammonia as N	9.57	0.100	mg/L	10.0		95.7	90-110			
Matrix Spike (B5J0502-MS1)				Source: BI50140-01 Prepared & Analyzed: 10/05/15						
Ammonia as N	5.00		mg/L	5.00	0.109	97.8	90-110			
Matrix Spike (B5J0502-MS2)				Source: BJ50008-01 Prepared & Analyzed: 10/05/15						
Ammonia as N	4.81	0.100	mg/L	5.00	ND	96.2	90-110			
Matrix Spike Dup (B5J0502-MSD1)				Source: BI50140-01 Prepared & Analyzed: 10/05/15						
Ammonia as N	4.99		mg/L	5.00	0.109	97.6	90-110	0.200	10	
Matrix Spike Dup (B5J0502-MSD2)				Source: BJ50008-01 Prepared & Analyzed: 10/05/15						
Ammonia as N	4.68	0.100	mg/L	5.00	ND	93.6	90-110	2.74	10	

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 Siloam Springs AR. 72761
 Attn: Tom Myers

Work Order: BI50140
 Project Name: Effluent
 Project Number: Effluent
 Date Received: 09/30/15

Chemistry Parameters by APHA/EPA Methods - Quality Control
Environmental Testing Group

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B5J0605 - Wet Prep										
Blank (B5J0605-BLK1) Prepared & Analyzed: 10/06/15										
Phosphorus, Total as P	ND	0.0500	mg L							
LCS (B5J0605-BS1) Prepared & Analyzed: 10/06/15										
Phosphorus, Total as P	1.07	0.0500	mg L	1.00		107	90-110			
Matrix Spike (B5J0605-MS1) Source: BI50140-01 Prepared & Analyzed: 10/06/15										
Phosphorus, Total as P	2.15	0.0500	mg L	0.500	1.73	84.0	90-110			#
Matrix Spike (B5J0605-MS2) Source: BJ50008-02 Prepared & Analyzed: 10/06/15										
Phosphorus, Total as P	0.929	0.0500	mg L	0.500	0.433	99.2	90-110			
Matrix Spike Dup (B5J0605-MSD1) Source: BI50140-01 Prepared & Analyzed: 10/06/15										
Phosphorus, Total as P	2.20	0.0500	mg L	0.500	1.73	94.0	90-110	2.30	6.01	
Matrix Spike Dup (B5J0605-MSD2) Source: BJ50008-02 Prepared & Analyzed: 10/06/15										
Phosphorus, Total as P	0.931	0.0500	mg L	0.500	0.433	99.6	90-110	0.215	6.01	

Notes and Definitions

- J Estimated Value. Compound was detected below minimum quantitation levels.
- G Estimated Value. Value was greater than reported result.
- # Recovery outside Laboratory historical or method prescribed limits.
- ND Analyte NOT DETECTED at PQL. ug/L. Micrograms Liter (PPB)
- PQL Practical Quantitation Limit. ug/Kg. Micrograms Kilogram (PPB)
- mg/L Milligrams/Liter (PPM). dry. Sample results reported on a dry weight basis
- mg/Kg Milligrams Kilogram (PPM)

Environmental Testing Group

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10/06/15 15:43

Client: City of Siloam Springs
 PO Box 80
 Siloam Springs AR, 72761
 Attn: Tom Myers

Work Order: B150140
 Project Name: Effluent
 Project Number: Effluent
 Date Received: 09/30/15

CERTIFICATIONS

Certified Analyses included in this Report

Analysis	Certifications
EPA 350.1	ADEQ,TNI
Ammonia as N	ADEQ,TNI
EPA 353.2	ADEQ,TNI
Nitrate/Nitrite as N	ADEQ,TNI
Nitrite as N	ADEQ,TNI
EPA 365.1	ADEQ,TNI
Phosphorus, Total as P	ADEQ,TNI
SM 5210B	ADEQ,TNI
Biochemical Oxygen Demand	ADEQ,TNI
SM 5210B CBOD	ADEQ
Carbonaceous BOD	ADEQ
USGS 1-3765-85	ADEQ,TNI
Total Suspended Solids	ADEQ,TNI

The laboratory at Environmental Testing Group Inc operates under the following certifications and accreditations:

The accredited report results were obtained in compliance with 2009 TNI standards unless otherwise noted. For a complete list of accredited analytes, please contact your project manager.

Code	Description	Number	Expires
ADEQ	State of Arkansas	04-0574-09-071-0	10/19/2015
TNI	FL DOH	E871035	06/30/2016

City of Siloam Springs

CITY OF SILOAM SPRINGS

B150140-01 A

975 Anderson Avenue
Siloam Springs, AR
website: siloamsprings.com

P.O. Box 80
Siloam Springs, AR 72761

Effluent
Sampled: 09/30/15 09:00
Water-Work Order Label
City of Siloam Springs

Phone: 479-524-5623 Fax: 479-524-4653

CHAIN OF CUSTODY

Client Information

Company Name: Siloam Springs
Address: P.O. Box 80
410 N. Broadway
Siloam Springs, Ar 72761
Telephone: (479) 524-5623
FAX: (479) 524-4653

Project Information

Permit/Project #:
Project Order #: 1001
Sampler Name(s): J. Harrison
and Signature(s): *J. Harrison*

Requested Parameters

<input checked="" type="checkbox"/>	CBOD
<input checked="" type="checkbox"/>	Total Suspended Solids
<input checked="" type="checkbox"/>	NH3-N
<input checked="" type="checkbox"/>	BOD
<input checked="" type="checkbox"/>	NO3
<input checked="" type="checkbox"/>	TP

Sample Identification

Identification	Lab Control #
Effluent;Outfall 001	B150140-01
Effluent;Outfall 001	
Influent	B150140-02
Influent	

Sample Collection

Date	Time	Type	Matrix	Type	Volume	Preservative	#
9/29/15	18:00	Comp	H2O	P	1 Qt	Refrigerated	1
9/29/15	09:00	Comp	H2O	P	500 ML	H2SO4 + Refrig	1
9/29/15	09:00	Comp	H2O	P	500 ML	H2SO4 + Refrig	1
9/29/15	18:00	Comp	H2O	P	1 Qt	Refrigerated	1

Sample Containers

Date	Time	Received By: (Signature and Printed Name)	Received For: Lab By: (Signature and Printed Name)
9/30/15	12:52	<i>J. Harrison</i>	<i>Deanna R. Cook</i>
9/30/15	13:35	<i>Deanna R. Cook</i>	

Received By: (Signature and Printed Name) *J. Harrison*

Received By: (Signature and Printed Name) *Deanna R. Cook*

Received For: Lab By: (Signature and Printed Name)

Received By: (Signature and Printed Name) *Deanna R. Cook*

Received For: Lab By: (Signature and Printed Name)

Comments: Sampler Effluent Temp 3.4 C Start 3-2 C Stop
Sampler Influent Temp 2.9 C Start 3-6 C Stop

Chlorinated? Yes No

This Document is Page 1 of 1

COPY

SVI Testing Data

Date 9/30 Time 0957

	BNR 1	BNR 2	BNR 3	MLSS
5 Min	950	}	950	150
10 Min	930		920	930
15 Min	920		910	920
20 Min	-		-	-
25 Min	-		-	-
30 Min	-		-	-

pH Testing Data

2015

Date 9/30 Time 0957

BNR 1	BNR 2	BNR 3
7.33	-	7.49
Alkalinity		
BNR 1	BNR 2	BNR 3
346	-	358

Date 10/1 Time 0941

	BNR 1	BNR 2	BNR 3	MLSS
5 Min	950	}	930	950
10 Min	930		920	930
15 Min	910		910	920
20 Min	910		900	920
25 Min	890		890	910
30 Min	880		880	900

pH Testing Data

Date 10/1 Time 0941

BNR 1	BNR 2	BNR 3
7.23	-	7.16
Alkalinity		
BNR 1	BNR 2	BNR 3
282	-	260

Date 10/2 Time 0948

	BNR 1	BNR 2	BNR 3	MLSS
5 Min	960	}	940	930
10 Min	940		920	910
15 Min	-		-	-
20 Min	-		-	-
25 Min	-		-	-
30 Min	-		-	-

pH Testing Data

Date 10/2 Time 0948

BNR 1	BNR 2	BNR 3
7.32	-	7.22
Alkalinity		
BNR 1	BNR 2	BNR 3
292	-	266

Date 10/3/15 Time 09:12

	BNR 1	BNR 2	BNR 3	MLSS
5 Min	930	}	920	920
10 Min	860		850	870
15 Min	820		800	810
20 Min	760		725	760
25 Min	725		680	710
30 Min	690		625	670

pH Testing Data

Date 10/3/15 Time 09:50

BNR 1	BNR 2	BNR 3
7.28	/	7.21
Alkalinity		
BNR 1	BNR 2	BNR 3
566	/	584

Date 10/4/15 Time 09:30

	BNR 1	BNR 2	BNR 3	MLSS
5 Min	980	}	920	960
10 Min	810		710	760
15 Min	730		610	670
20 Min	670		550	600
25 Min	610		500	550
30 Min	570		450	500

pH Testing Data

Date 10-4-15 Time 09:50

BNR 1	BNR 2	BNR 3
7.03	/	7.72
Alkalinity		
BNR 1	BNR 2	BNR 3
7.17	/	264

SVI Testing Data

Date 9-25 Time 9:30

	BNR 1	BNR 2	BNR 3	MLSS
5 Min	/	/	900	940
10 Min	/	/	870	900
15 Min	/	/	850	840
20 Min	/	/	800	780
25 Min	/	/	750	720
30 Min	/	/	760	670

pH Testing Data

Date 9-25 Time 9:10 2015

BNR 1	BNR 2	BNR 3
-	-	6.99
Alkalinity		
BNR 1	BNR 2	BNR 3
-	-	300

Date 9-26 Time

	BNR 1	BNR 2	BNR 3	MLSS
5 Min	/	/	870	730
10 Min	/	/	780	520
15 Min	/	/	670	440
20 Min	/	/	560	380
25 Min	/	/	500	350
30 Min	/	/	440	310

pH Testing Data

Date 9-26 Time 9:25

BNR 1	BNR 2	BNR 3
-	-	6.88
Alkalinity		
BNR 1	BNR 2	BNR 3
-	-	280

Date 9-27 Time

	BNR 1	BNR 2	BNR 3	MLSS
5 Min	/	/	940	920
10 Min	/	/	900	770
15 Min	/	/	890	650
20 Min	/	/	870	570
25 Min	/	/	840	530
30 Min	/	/	850	480

pH Testing Data

Date 9-27 Time

BNR 1	BNR 2	BNR 3
-	-	6.90
Alkalinity		
BNR 1	BNR 2	BNR 3
-	-	260

Date 9-28 Time 0859

	BNR 1	BNR 2	BNR 3	MLSS
5 Min	/	/	940	910
10 Min	/	/	880	800
15 Min	/	/	850	720
20 Min	/	/	770	650
25 Min	/	/	720	600
30 Min	/	/	690	560

pH Testing Data

Date 9-28 Time 0859

BNR 1	BNR 2	BNR 3
-	-	7.48
Alkalinity		
BNR 1	BNR 2	BNR 3
-	-	296

Date 9-29 Time 0904

	BNR 1	BNR 2	BNR 3	MLSS
5 Min	950	/	950	950
10 Min	920	/	920	920
15 Min	890	/	870	870
20 Min	870	/	790	830
25 Min	850	/	720	820
30 Min	840	/	670	800

pH Testing Data

Date 9-29 Time 0904

BNR 1	BNR 2	BNR 3
7.43 7.24	-	7.43
Alkalinity		
BNR 1	BNR 2	BNR 3
386 384	-	386

SVI Testing Data

Date 9-20-15 Time 09:10

	BNR 1	BNR 2	BNR 3	MLSS
5 Min			620	620
10 Min			510	500
15 Min			450	440
20 Min			420	400
25 Min			400	370
30 Min			390	360

pH Testing Data

2015

Date 9-20-15 Time 09:22

BNR 1	BNR 2	BNR 3
/	/	7.57
Alkalinity		
BNR 1	BNR 2	BNR 3
/	/	300

Date 9/21 Time 0912

	BNR 1	BNR 2	BNR 3	MLSS
5 Min			750	890
10 Min			580	760
15 Min			500	650
20 Min		440	440	580
25 Min			500	520
30 Min			380	480

pH Testing Data

Date 9/21 Time 0912

BNR 1	BNR 2	BNR 3
-	-	7.66
Alkalinity		
BNR 1	BNR 2	BNR 3
-	-	272

Date 9/22 Time 0908

	BNR 1	BNR 2	BNR 3	MLSS
5 Min			620	750
10 Min			510	640
15 Min			450	570
20 Min			410	500
25 Min			390	460
30 Min			370	430

pH Testing Data

Date 9/22 Time 0908

BNR 1	BNR 2	BNR 3
-	-	7.82
Alkalinity		
BNR 1	BNR 2	BNR 3
-	-	372

Date 9/23 Time 08:38

	BNR 1	BNR 2	BNR 3	MLSS
5 Min			700	720
10 Min			580	580
15 Min			490	500
20 Min			440	450
25 Min			420	420
30 Min			400	410

pH Testing Data

Date 9-23 Time 08:50

BNR 1	BNR 2	BNR 3
/	/	7.77
Alkalinity		
BNR 1	BNR 2	BNR 3
/	/	354

Date 9-24 Time 9:05

	BNR 1	BNR 2	BNR 3	MLSS
5 Min			960	930
10 Min			860	880
15 Min			850	820
20 Min			770	760
25 Min			720	710
30 Min			670	670

pH Testing Data

Date 9-24-15 Time 9:05

BNR 1	BNR 2	BNR 3
-	-	7.29
Alkalinity		
BNR 1	BNR 2	BNR 3
-	-	320

Daily TSS Testing Data

2615

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
9-27			.1196	.1229	.1193	.1230
Filter wt.						
Dry wt.			.1686	.1247	.1690	.1883
Calc			.0500	.0018	.0497	.0653
TSS			2500	90	2485	3265

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
9-28			.1242	.1190	.1184	.1191
Filter wt.						
Dry wt.			.1761	.1200	.1706	.1829
Calc			.0519	.001	.0522	.0638
TSS			2595	50	2610	3190

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
9-29	.1188		.1225	.1183	.1221	.1223
Filter wt.						
Dry wt.	.1756		.1783	.1201	.1793	.202
Calc	.0568		.0558	.0018	.0572	.0789
TSS	2840		2790	90	2860	3945

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
9-30	.1212		.1234	.1195	.1238	.1217
Filter wt.						
Dry wt.	.1861		.1814	.1207	.1851	.2137
Calc	.0649		.0580	.0012	.0613	.0926
TSS	3245		2900	60	3065	4630

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS	EFF
10-1	.1208		.1217	.1231	.1216	.1214	.1212
Filter wt.							
Dry wt.	.1704		.1793	.1252	.1920	.2136	.1221
Calc	.0496		.0576	.0021	.0704	.0922	.0009
TSS	2480		2880	105	3520	4610	45

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS	EFF
10-2	.1217		.1212	.1214	.1214	.1218	.1213
Filter wt.							
Dry wt.	.1692		.1746	.1223	.1888	.2209	.1209
Calc	.0475		.0534	.0009	.0674	.0991	.0006
TSS	2375		2670	45	3370	4955	30

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
10-3-15	.1207		.1219	.1206	.1213	.1216
Filter wt.						
Dry wt.	.1859		.1798	.1323	.1814	.2129
Calc	.0652		.0579	.0117	.0601	.0913
TSS	3260		2895	585	3005	4565

Dry wt. - Filter wt. X 1000 / .02 = TSS

Daily TSS Testing Data

2015

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
9-20-15			0.1237	0.1235	0.1215	0.1225
Filter wt.						
Dry wt.			0.2072	0.1382	0.1991	0.2849
Calc			0.0235	0.0147	0.0744	0.1624
TSS			4175	735	3830	9120

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
9/21			.1236	.1211	.1245	.1221
Filter wt.						
Dry wt.			.1953	.1223	.1983	.3037
Calc			.0717	.0012	.0738	.1816
TSS			3585	60	3690	9080

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
9/22			.1234	.1241	.1242	.1228
Filter wt.						
Dry wt.			.1975	.1253	.1988	.3003
Calc			.0741	.0012	.0746	.1775
TSS			3705	60	3730	8875

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
9/23			0.1250	0.1252	0.1225	0.1242
Filter wt.						
Dry wt.			0.2008	0.1289	0.2015	0.2319
Calc			0.0758	0.0037	0.0790	0.1077
TSS			3790	185	3980	5385

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
9-24			.1230	.1240	.1245	.1234
Filter wt.						
Dry wt.			.1987	.1262	.2009	.2427
Calc			.0757	.0022	.0764	.1193
TSS			3785	110	3820	5965

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
9-25			.1222	.1197	.1242	.1228
Filter wt.						
Dry wt.			.1241	.1219	.1949	.2032
Calc			.0619	.0022	.0707	.0794
TSS			3085	110	3535	3970

Date	BNR 1	BNR 2	BNR 3	INF	MLSS	Final RAS
9-26			.1235	.1195	.1194	.1185
Filter wt.						
Dry wt.			.1708	.1207	.1630	.1626
Calc			.0473	.0012	.0436	.0441
TSS			2365	60	2180	2205

Dry wt. - Filter wt. X 1000 / .02 = TSS

2015

PLANT HEADWORKS DATA

Sampler Initials	Sample pH	Sample Temp F	Sample Time	Sample Date	Sample Type	Sample TSS-mg/L	Sample COD-mg/L	Sample Alkalinity
JLH	7.46	76.1	08:55	08-22-15	G	275	-	200
JLH	6.92	73.4	08:56	08-22-15	G	480	-	68
JLH	7.50	73.9	08:49	8/24	G	100	-	166
JLH	7.41	75.2	08:22	8/25	G	55	520	168
JLH	7.39	72.9	08:18	8/26	G	90	-	174
JLH	7.52	77.4	08:14	8/27	G	65	-	170
JLH	7.39	76.8	08:28	8/28	G	115	-	120
JLH	7.10	76.8	8:10	8-28	G	-	-	136
JLH	7.41	76.9	8:00	8/30	G	-	-	136
JLH	7.35	76.3	08:05	8/31	G	95	-	148
JLH	7.58	76.5	08:10	9/1	G	70	1320	174
JLH	7.53	77.2	08:04	9/2	G	45	-	142
JLH	7.42	75.9	08:00	9/3	G	70	-	146
JLH	7.28	76.3	08:30	9/4	G	75	-	168
JLH	7.20	77.0	10:02	9/5	G	495	-	124
JLH	7.22	77.2	11:31	9/6	G	280	-	116
JLH	7.16	77.5	10:52	9/7	G	195	-	122
JLH	7.23	75.7	08:14	9/8	G	95	980	136
JLH	7.24	77.2	08:50	9/9	G	85	-	128
JLH	7.31	77.0	08:22	9/10	G	120	-	142
JLH	7.42	76.1	08:00	9/11	G	80	-	194
JLH	7.12	74.3	08:40	9/12/15	G	1140	-	118
JLH	7.27	73.0	09:02	9/13/15	G	210	-	140
JLH	7.31	75.2	08:10	9/14	G	80	-	170
JLH	7.14	75.2	08:05	9/15	G	145	1530	164
JLH	7.21	76.1	08:06	9/16	G	85	-	178
JLH	7.27	73.9	08:12	9/17	G	70	-	180
JLH	7.29	76.3	08:02	9/18	G	115	-	184
JLH	7.14	76.8	08:26	9/19	G	80	-	192
JLH	7.26	72.3	09:08	9/20/15	G	135	-	136
JLH	6.98	74.5	08:18	9/21	G	60	-	198
JLH	6.88	74.5	08:07	9/22	G	60	1920	194
JLH	7.11	75.0	08:40	9/23	G	185	-	170
JLH	6.40	72.1	8:50	9-24	F	110	-	180
JLH	6.80	72.6	9:05	9-25	F	110	-	160
JLH	6.60	74.8	8:20	9-26	G	60	-	200
JLH	6.55	73.2	8:35	9-27	G	90	-	140
JLH	6.98	74.1	08:04	9/28	G	50	-	194
JLH	7.03	74.5	08:05	9/29	G	90	1540	208
JLH	7.34	73.9	08:27	9/30	G	60	1150	182
JLH	7.31	72.9	08:46	10/1	G	105	1040	186
JLH	7.24	72.8	08:07	10/2	G	45	-	182

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DATE	Effluent Discharge		Process Control Chlorine Contact Basin Up Stream of Discharge				
	pH	D.O.	TP	NH3-N	D.O.	TSS	C.O.D.
9/26/2015	7.89						
9/27/2015							
9/28/2015			1.21		1.4		
9/29/2015		5.47	0.99	0.8			
9/30/2015	7.86	5.05	1.21	1.4			
10/1/2015	7.58	7.04	0.7	0.4		20	10
10/2/2015	8.04		1.33	1.2			
10/5/2015	7.62						
10/6/2015	7.54	7.9	0.17	0.2		15	5
10/7/2015		7.4	0.14	0.2			

ATTACHMENT 2

PART I. SPECIFIC CONDITIONS

SECTION A - DISCHARGE LIMITATIONS

SAGER CREEK FOODS, INC:

<u>Pollutant</u>	<u>Daily Maximum (mg/l)</u>	<u>Maximum Monthly Average (mg/l)</u>
Oil and Grease	100 mg/l	100 mg/l
pH	Between 6 – 9	N/A
Total Suspended Solids	900 mg/l	305 mg/l
BOD	900 mg/l	375 mg/l
COD	Report Only mg/l	Report Only mg/l
Maximum Discharge	1,500,000 MGD	1,500,000 MGD
Phosphorus (T)	15 mg/l	10 mg/l
Ammonia (NH ₃ -N)	20 mg/l	10 mg/l
Nitrate-Nitrogen (NO ₃)	10 mg/l	7 mg/l
Cyanide	Report only mg/l	Report only mg/l
Zinc	Report only mg/l	Report only mg/l
Copper	1.4 lbs/day	1.1660 lbs/day
Mercury	Report Only mg/l	Report Only mg/l
TKN	50 mg/l	45 mg/l

These limits (except Oil and Grease) are to be applied to the regulated process waste streams prior to any dilution from non-regulated or dilution waste streams. If the point at which samples are collected from this facility is subsequent to any dilution by non-regulated or dilution waste systems, then it shall be the permittee's responsibility to furnish to the City all information necessary to calculate combined waste stream limits.

SECTION B - SELF-MONITORING REQUIREMENTS

Sample Monitoring Requirements

<u>Pollutant</u>	<u>Location</u>	<u>Frequency</u>	<u>Sample Type</u>
Flow*	(1)	Daily	Record on Log (Daily)
TSS	(1)	3 times/week	24 hr. time composite
Oil & Grease	(1)	Monthly	Preserved Grab
pH	(1)	3 times/week	Grab
BOD	(1)	3 times/week	24 hr. time composite
Copper (T)	(1)	Monthly	24 hr. time composite
Cyanide (T)	(1)	Quarterly	Grab
Phosphorus (T)	(1)	3 times/week	24 hr. time composite
Ammonia (NH ₃ -N)	(1)	3 times/week	24 hr. time composite
Nitrate-Nitrogen (NO ₃ -N)	(1)	3 times/week	24 hr. time composite
Zinc (T)	(1)	Quarterly	24 hr. time composite
Mercury	(1)	Quarterly	24 hr. time composite
TKN	(1)	3 times/week	24 hr. time composite
COD	(1)	Weekly	Grab

*Calibration of flow monitoring equipment must be verified on an annual basis. Documentation of this verification must be available to City representatives upon request. Any time the calibration is more than 5% off, the flow equipment must be recalibrated, and this recalibration documented.

The reporting period for this permit shall be monthly.

ATTACHMENT 3

Inspection Report: City of Siloam Springs POTW, AFIN: 04-00106, Permit #: AR0020273

Sager Creek Vegetable Company - Country

Wastewater Discharge to Siloam Springs

Month:	Sep-2015		Flow		DAF Effluent Analytical Data (composite except for pH, cyanide, COD, O&G)												
Parameter	Discharge		BOD	TSS	Oil & Grease	Copper	Copper	Cyanide	Zinc	Phos	NH3-N	TKN	Nitrate	COD	Mercury	pH	
Units	gallons	mill gallons	mg/l	mg/l	mg/l	mg/l	lb/day	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	mg/l	std units	
Sampling Frequency	Daily	Daily	3x/week	3x/week	monthly	monthly	monthly	quarterly	quarterly	3x/week	3x/week	3x/week	3x/week	weekly	quarterly	3x/week	
Limits	Monthly Avg	1,500,000	1.5	375	305	100		1.166		10	10	45	7			6.0	
	Daily Max	1,500,000	1.5	900	900	100		1.4		15	20	50	10			9.0	
	Monthly Total	26,199,700	26,200														
Monthly Summary	Monthly Avg	873,323	0.873	668	26	5.1	0.000	1.000	#DIV/0!	#DIV/0!	0.2	0.0	9.4	0.5	881.8	#DIV/0!	7.2
	Count	30	30	11	11	1	1	1	0	0	11	11	11	4	0	30	
	Daily Max	1,444,300	1,444	1,913	60	5.1	0.000	1.000	0.0	0.0	0.5	0.1	12.3	1.0	2,460.0	0.0	8.1
	Daily Min	0	0.000	5	10	5.1	0.000	1.000	0.0000	0.0000	0.0	0.0	4.5	0.3	134.0	0.00000	6.0
Tues	1	809,100	0.809	31.5	22.0					0.4	0.0	12.30	0.39	134		7.98	
Wed	2	1,126,000	1.126	28.0	38.0					0.4	0.0	11.20	0.40			8.04	
Thurs	3	1,132,700	1.133													7.75	
Fri	4	764,600	0.765													7.80	
Sat	5	0	0.000													7.40	
Sun	6	763,500	0.764													7.40	
Mon	7	1,304,400	1.304													7.77	
Tues	8	1,121,200	1.121													7.95	
Wed	9	1,443,200	1.443	226.0	36.0	5.1	0.000	1.000		0.5	0.0	7.80	0.31	320		7.83	
Thurs	10	552,700	0.553	193.2	28.0					0.3	0.0	10.10	0.40			7.91	
Fri	11	695,600	0.696	4.7	14.0					0.2	0.0	10.10	0.28			7.68	
Sat	12	446,000	0.446													7.65	
Sun	13	656,100	0.656													7.66	
Mon	14	1,224,600	1.225	295.0	24.0					0.0	0.0	4.50	0.32	613		7.60	
Tues	15	916,900	0.917	444.0	60.0					0.2	0.1	11.20	0.34			6.84	
Wed	16	882,800	0.883	673.0	20.0					0.1	0.0	6.70	0.46			7.18	
Thurs	17	992,600	0.993													8.10	
Fri	18	1,045,600	1.046													7.28	
Sat	19	425,100	0.425													6.83	
Sun	20	577,900	0.578													6.27	
Mon	21	1,227,600	1.228													6.05	
Tues	22	1,377,600	1.378	1,790.0	12.0					0.3	0.0	8.90	0.71	2460		6.10	
Wed	23	996,600	0.999	1,746.0	10.0					0.0	0.0	11.20	0.94			6.01	
Thurs	24	1,444,300	1.444	1,913.0	27.0					0.0	0.0	8.90	1.00			7.25	
Fri	25	1,012,900	1.013													7.21	
Sat	26	1,027,800	1.028													7.06	
Sun	27	874,800	0.875													6.38	
Mon	28	1,174,500	1.175													6.02	
Tues	29	181,000	0.181													6.06	
Wed	30	0	0.000													6.50	

Environmental Services Company, Inc.

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 13715 West Markham
 Little Rock, AR 72211
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
 Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1508020477
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/11/15
 Composite Date: 08/30/15 -08/31/15
 Sample Time : 0700-0700
 Sample Type : COMP
 Sample From : DAF EFFLUENT
 Collected By: NF
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
08/31	1400	KIK	36.0	mg/L		SM 2001 5210 B	1.20	98.0 *
09/02	1100	RHB	0.1	mg/L		SM 1997 4500-NH3 F	8.70	113.0 *
09/11	0815	TSB	8.90	mg/L		SM 1997 4500-NORGB	1.86	99.4 *
09/08	1100	TSB	0.47	mg/L		SM 2000 4500-NO3 E	1.50	96.0 *
09/02	1400	RHB	0.5	mg/L		EPA 365.3	4.88	108.8 *
09/04	0900	KIK	34.0	mg/L		SM 1997 2540 D	11.76	N/A

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Richard Broom
 Environmental Services Co., Inc.

Environmental Services Company, Inc.

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Control Number: 1509020004
Customer Name : SAGER CREEK WEG.CO.-WW-DAF EFF.
Customer Number : 2292
Report Date : 09/11/15
Composite Date:08/31/15 -09/01/15
Sample Time : 0700-0700
Sample Type : COMP
Sample From : DAF EFFLUENT
Collected By: CH
Delivery By : RHB
Work Order :
Purchase Order :

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
09/02	0800	KIK	BOD, 5-day	31.5 mg/L			SM 2001 5210 B	0.09	95.1 *
09/02	1100	RHB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	8.70	113.0 *
09/11	0815	TSB	Kjeldahl Nitrogen Total	12.30 mg/L			SM 1997 4500-NORGB	1.86	99.4 *
09/08	1100	TSB	Nitrate Nitrogen	0.39 mg/L			SM 2000 4500-NO3 E	1.50	96.0 *
09/08	0900	TSB	Phosphorous, Total (as P)	0.4 mg/L			EPA 365.3	2.06	105.8 *
09/04	0900	KIK	Solids, Total Suspended	22.0 mg/L			SM 1997 2540 D	11.76	N/A *

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Signature Richard Brown
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Control Number: 1509020058
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/10/15
 Sample Date : 09/01/15
 Sample Time : 0700
 Sample Type : GRAB
 Sample From : DAF EFFLUENT
 Collected By: CH
 Delivery By : RHB
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis Date	Time	By	Parameter	Result	Notes	Quantity	Method	Quality Assurance Precision	Accuracy
09/10	0530	RHB	Chemical Oxygen Demand	134.0 mg/L			11/2014 HACH 8000	% RPD	% Recovery
								0.83	100.1 *

* QA data shown is from a different sample or standard on the same date.

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Control Number: 1509020017
Customer Name : SAGER CREEK VEG. CO. -WW-DAF EFF.
Customer Number : 2292
Report Date : 09/11/15

Composite Date: 09/01/15 -09/02/15
Sample Time : 0700-0900
Sample Type : COMP
Sample From : DAF EFFLUENT

Collected By: WDS
Delivery By : WDS
Work Order :
Purchase Order :

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
09/04	0800 KIK	BOD, 5-day	28.0 mg/L			SM 2001 5210 B	5.00	94.4 *
09/04	1022 RHB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	0.00	102.2 *
09/11	0815 TSB	Kjeldahl Nitrogen Total	11.20 mg/L			SM 1997 4500-NORG B	1.86	99.4 *
09/08	1100 TSB	Nitrate Nitrogen	0.40 mg/L			SM 2000 4500-NO3 E	1.50	96.0 *
09/08	0900 TSB	Phosphorous, Total (as P)	0.4 mg/L			EPA 365.3	2.06	105.8 *
09/08	1235 KIK	Solids, Total Suspended	38.0 mg/L			SM 1997 2540 D	4.65	N/A *

* QA data shown is from a different sample or standard on the same date.

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Signature Richard Bloom
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Control Number: 1509020087
 Customer Name : SAGER CRBEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/24/15
 Composite Date: 09/08/15 -09/09/15
 Sample Time : 0700-0700
 Sample Type : COMP/GRAB
 Sample From : DAF EFFLUENT
 Collected By: CH/WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/09	0800	KIK	BOD, 5-day	226.0 mg/L			SM 2001 5210 B	7.26	99.9 *
09/15	0930	NTR	Metals Digestion	1			1994 EPA 200.8	0.00	100.0
09/11	1315	TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.52	101.3 *
09/15	0800	TSB	Kjeldahl Nitrogen Total	7.80 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500	TSB	Nitrate Nitrogen	0.31 mg/L			SM 2000 4500-NO3 E	0.47	103.1
09/16	0830	TSB	Oil & Grease, Total	5.1 mg/L			EPA 1664 Rev B	2.36	98.0 *
09/09	1225	WDS	pH	7.7 S.U.			SM 2000 4500-H+ B	0.00	N/A *
09/10	1600	TSB	Phosphorous, Total (as P)	0.5 mg/L			EPA 365.3	0.00	101.1 *
09/11	0950	KIK	Solids, Total Suspended	36.0 mg/L			SM 1997 2540 D	0.00	N/A *
09/22	1204	RAH	Copper	< 0.0030 mg/L			EPA 200.8	4.43	107.1

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Signature 
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Control Number: 1509020163
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/10/15

Sample Date : 09/09/15
 Sample Time : 1225
 Sample Type : GRAB
 Sample From : DAF EFFLUENT

Collected By: CH/WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis Date 09/10 0530 RHB	Parameter Chemical Oxygen Demand	Result 320.0 mg/L	Notes Quantity	Method 11/2014 HACH 8000	Quality Assurance Precision % RPD 0.83	Accuracy % Recovery 100.1 *
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Signature 
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Control Number: 1509020163
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/10/15
 Sample Date : 09/09/15
 Sample Time : 1225
 Sample Type : GRAB
 Sample From : DAF EFFLUENT
 Collected By: CH/WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Analysis		Laboratory Analysis		Quality Assurance	
Date	Time By	Parameter	Result	Precision % RPD	Accuracy % Recovery
09/10	0530 RHB	Chemical Oxygen Demand	320.0 mg/L	0.83	100.1 *
					Method 11/2014 HACH 8000

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Control Number: 1509020097
 Customer Name : SAGER CREEK VEG.CO.--WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/17/15
 Composite Date: 09/09/15 -09/10/05
 Sample Time : 0700-0700
 Sample Type : COMP
 Sample From : DAF EFFLUENT
 Collected By: CH
 Delivery By : KIK
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision \$ RPD	Accuracy % Recovery
09/11	0800 KIK	BOD, 5-day	193.2 mg/L			SM 2001 5210 B	2.43	101.1 *
09/11	1315 TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 P	3.75	101.3 *
09/15	0800 TSB	Kjeldahl Nitrogen Total	10.10 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500 TSB	Nitrate Nitrogen	0.40 mg/L			SM 2000 4500-NO3 E	0.47	103.1 *
09/11	1100 TSB	Phosphorous, Total (as P)	0.3 mg/L			EPA 365.3	2.25	102.7 *
09/15	1110 KIK	Solids, Total Suspended	28.0 mg/L			SM 1997 2540 D	40.00	N/A *

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Control Number: 1509020097
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/17/15
 Composite Date: 09/09/15 -09/10/05
 Sample Time : 0700-0700
 Sample Type : COMP
 Sample From : DAF EFFLUENT
 Collected By: CH
 Delivery By : KIK
 Work Order :
 Purchase Order :

Laboratory Analysis

Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/11	0800 KIK	BOD, 5-day	193.2 mg/L			SM 2001 5210 B	2.43	101.1 *
09/11	1315 TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 P	3.75	101.3 *
09/15	0800 TSB	Kjeldahl Nitrogen Total	10.10 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500 TSB	Nitrate Nitrogen	0.40 mg/L			SM 2000 4500-NO3 E	0.47	103.1 *
09/11	1100 TSB	Phosphorous, Total (as P)	0.3 mg/L			EPA 365.3	2.25	102.7 *
09/15	1110 KIK	Solids, Total Suspended	28.0 mg/L			SM 1997 2540 D	40.00	N/A *

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Control Number: 1509020111
Customer Name: SAGER CREEK VEG.CO.-WW-DAF EFF.
Customer Number: 2292
Report Date: 09/18/15
Composite Date: 09/10/15 -09/11/15
Sample Time: 0700-0700
Sample Type: COMP
Sample From: DAF EFFLUENT
Collected By: WDS
Delivery By: WDS
Work Order:
Purchase Order:

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
09/11	0800	KIK	BOD, 5-day	4.7	mg/L		SM 2001 5210 B	2.43	101.1 *
09/15	1130	TSB	Ammonia Nitrogen	< 0.1	mg/L		SM 1997 4500-NH3 F	2.25	98.4 *
09/15	0800	TSB	Kjeldahl Nitrogen Total	10.10	mg/L		SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500	TSB	Nitrate Nitrogen	0.28	mg/L		SM 2000 4500-NO3 B	0.47	103.1 *
09/15	1510	TSB	Phosphorous, Total (as P)	0.2	mg/L		EPA 365.3	0.00	100.0 *
09/17	1030	KIK	Solids, Total Suspended	14.0	mg/L		SM 1997 2540 D	0.00	N/A *

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Control Number: 1509020111
Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
Customer Number : 2292
Report Date : 09/18/15
Composite Date: 09/10/15 -09/11/15
Sample Time : 0700-0700
Sample Type : COMP
Sample From : DAF EFFLUENT
Collected By: WDS
Delivery By : WDS
Work Order :
Purchase Order :

Laboratory Analysis

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision \$ RPD	Accuracy % Recovery
09/11	0800 KIK	BOD, 5-day	4.7 mg/L			SM 2001 5210 B	2.43	101.1 *
09/15	1130 TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.25	98.4 *
09/15	0800 TSB	Kjeldahl Nitrogen Total	10.10 mg/L			SM 1997 4500-NORG B	1.16	99.7 *
09/14	1500 TSB	Nitrate Nitrogen	0.28 mg/L			SM 2000 4500-NO3 E	0.47	103.1 *
09/15	1510 TSB	Phosphorous, Total (as P)	0.2 mg/L			EPA 365.3	0.00	100.0 *
09/17	1030 KIK	Solids, Total Suspended	14.0 mg/L			SM 1997 2540 D	0.00	N/A *

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Control Number: 1509020111
Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
Customer Number : 2292
Report Date : 09/18/15
Composite Date: 09/10/15 -09/11/15
Sample Time : 0700-0700
Sample Type : COMP
Sample From : DAF EFFLUENT
Collected By: WDS
Delivery By : WDS
Work Order :
Purchase Order :

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/11	0800	KIK	BOD, 5-day	4.7 mg/L			SM 2001 5210 B	2.43	101.1 *
09/15	1130	TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.25	98.4 *
09/15	0800	TSB	Kjeldahl Nitrogen Total	10.10 mg/L			SM 1997 4500-NorGB	1.16	99.7 *
09/14	1500	TSB	Nitrate Nitrogen	0.28 mg/L			SM 2000 4500-NO3 E	0.47	103.1 *
09/15	1510	TSB	Phosphorous, Total (as P)	0.2 mg/L			EPA 365.3	0.00	100.0 *
09/17	1030	KIK	Solids, Total Suspended	14.0 mg/L			SM 1997 2540 D	0.00	N/A *

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Control Number: 1509020197
 Customer Name: SAGER CREEK VEG.CO.-LAGOON
 Customer Number: 1381
 Report Date: 09/18/15
 Sample Date: 09/11/15
 Sample Time: 0905
 Sample Type: GRAB
 Sample From: LAGOON
 Collected By: WDS
 Delivery By: WDS
 Work Order:
 Purchase Order:

Laboratory Analysis

Date	Time	Ev	Parameter	Result	Notes	Quantity	Method	Precision \$ RPD	Quality Assurance Accuracy % Recovery
09/18	0845	TSB	Alkalinity (as CaCO3)	300.00 mg/L			SM 1997 2320 B	3.64	0.0 *
09/11	0800	KIK	BOD, 5-day	219.0 mg/L			SM 2001 5210 B	2.43	101.1 *
09/15	1330	RHB	Chemical Oxygen Demand	1484.0 mg/L			11/2014 HACH 8000	0.63	93.3 *
09/11	0905	WDS	Dissolved Oxygen	0.2 mg/L			SM 2001 4500-O G	0.00	N/A
09/15	0800	TSB	Kjeldahl Nitrogen Total	67.20 mg/L			SM 1997 4500-NorGB	1.16	99.7 *
09/11	0905	WDS	pH	7.3 S.U.			SM 2000 4500-H+ B	0.00	N/A *
09/17	1030	KIK	Solids, Total Suspended	920.0 mg/L			SM 1997 2540 D	0.00	N/A *
09/14	1500	TSB	Nitrate + Nitrite	0.7 mg/L			SM 2000 4500-NO3 E	0.00	103.1 *
09/11	0800	KIK	Soluble BOD	74.4 mg/L			SM 2001 5210 B	11.54	101.1 *

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Control Number: 1509020197
Customer Name: SAGER CREEK VEG.CO.-LAGOON
Customer Number: 1381
Report Date: 09/18/15
Sample Date: 09/11/15
Sample Time: 0905
Sample Type: GRAB
Sample From: LAGOON
Collected By: WDS
Delivery By: WDS
Work Order:
Purchase Order:

Laboratory Analysis

Analysis		Result		Notes	Quantity	Method	Quality Assurance	
Date	Time By	Parameter					Precision \$ RPD	Accuracy % Recovery
09/18	0845	TSE	Alkalinity (as CaCO3)	300.00 mg/L		SM 1997 2320 B	3.64	0.0 *
09/11	0800	KIK	BOD, 5-day	219.0 mg/L		SM 2001 5210 B	2.43	101.1 *
09/15	1330	RHB	Chemical Oxygen Demand	1484.0 mg/L		11/2014 RACH 8000	0.63	93.3 *
09/11	0905	WDS	Dissolved Oxygen	0.2 mg/L		SM 2001 4500-C G	0.00	N/A
09/15	0800	TSB	Kjeldahl Nitrogen Total	67.20 mg/L		SM 1997 4500-NorGB	1.16	99.7 *
09/11	0905	WDS	pH	7.3 S.U.		SM 2000 4500-H+ B	0.00	N/A *
09/17	1030	KIK	Solids, Total Suspended	920.0 mg/L		SM 1997 2540 D	0.00	N/A *
09/14	1500	TSB	Nitrate + Nitrite	0.7 mg/L		SM 2000 4500-NO3 B	0.00	103.1 *
09/11	0800	KIK	Soluble BOD	74.4 mg/L		SM 2001 5210 B	11.54	101.1 *

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Control Number: 1509020200
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/21/15
 Composite Date:09/13/15 -09/14/15
 Sample Time : 0700-0745
 Sample Type : COMP/GRAB
 Sample From : DAF EFFLUENT
 Collected By: NF
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/14	1000 KIK	BOD, 5-day	295.0 mg/L			SM 2001 5210 B	3.33	94.4 *
09/15	1130 TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.25	98.4 *
09/15	0800 TSB	Kjeldahl Nitrogen Total	4.50 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500 TSB	Nitrate Nitrogen	0.32 mg/L			SM 2000 4500-NO3 E	0.47	103.1 *
09/14	1210 WDS	pH	7.6 S.U.			SM 2000 4500-H+ B	0.00	N/A *
09/15	1510 TSB	Phosphorous, Total (as P)	< 0.1 mg/L			EPA 365.3	0.00	100.0 *
09/17	1030 KIK	Solids, Total Suspended	24.0 mg/L			SM 1997 2540 D	0.00	N/A *

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Control Number: 1509020200 Composite Date: 09/13/15 -09/14/15 Collected By: NF
 Customer Name : SAGER CREEK VRG.CO.-WW-DAF EFF. Sample Time : 0700-0745 Delivery By : WDS
 Customer Number : 2292 Sample Type : COMP/GRAB Work Order :
 Report Date : 09/21/15 Sample From : DAF EFFLUENT Purchase Order :

Laboratory Analysis

Analysis		Result		Notes	Quantity	Method	Quality Assurance	
Date	Time By	Parameter	Result				Precision % RPD	Accuracy % Recovery
09/14	1000 KIK	BOD, 5-day	295.0 mg/L			SM 2001 5210 B	3.33	94.4 *
09/15	1130 TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.25	98.4 *
09/15	0800 TSB	Kjeldahl Nitrogen Total	4.50 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500 TSB	Nitrate Nitrogen	0.32 mg/L			SM 2000 4500-NO3 E	0.47	103.1 *
09/14	1210 WDS	pH	7.6 S.U.			SM 2000 4500-H+ B	0.00	N/A *
09/15	1510 TSB	Phosphorous, Total (as P)	< 0.1 mg/L			EPA 365.3	0.00	100.0 *
09/17	1030 KIK	Solids, Total Suspended	24.0 mg/L			SM 1997 2540 D	0.00	N/A *

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Control Number: 1509020281
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/21/15
 Sample Date : 09/14/15
 Sample Time : 1210
 Sample Type : GRAB
 Sample From : DAF EFFLUENT
 Collected By: WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	% RPD	% Recovery
09/15	1330	RHB	Chemical Oxygen Demand	613.0 mg/L		11/2014 HACH 8000	0.63	93.3 *

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Control Number: 1509020281
 Customer Name : SAGER CREEK VEG.CO. -WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/21/15
 Sample Date : 09/14/15
 Sample Time : 1210
 Sample Type : GRAB
 Sample From : DAF EFFLUENT
 Collected By: WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
09/15	1330	RHB	Chemical Oxygen Demand	613.0 mg/L		11/2014 HACH 8000	0.63	93.3 *

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

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Control Number: 1509020210
Customer Name: SAGER CREEK VEG.CO.-RW-DAF EFF.
Customer Number: 2292
Report Date: 09/22/15
Composite Date: 09/14/15 -09/15/15
Sample Time: 0645-0645
Sample Type: COMP
Sample From: DAF EFFLUENT
Collected By: NF
Delivery By: KIK
Work Order:
Purchase Order:

Laboratory Analysis

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
09/16	0800	RHB					6.43	92.9 *
09/17	1000	BOD, 5-day	444.0 mg/L	(b)		SM 2001 5210 B	3.57	97.0 *
09/21	0830	Ammonia Nitrogen	0.1 mg/L			SM 1997 4500-NH3 F	3.88	100.3 *
09/17	1300	Kjeldahl Nitrogen Total	11.20 mg/L			SM 1997 4500-NcrigB	1.04	100.3 *
09/17	1015	Nitrate Nitrogen	0.34 mg/L			SM 2000 4500-NO3 E	0.00	100.3 *
09/21	1440	Phosphorous, Total (as P)	0.2 mg/L			EPA 365.3	0.00	N/A *
		Solids, Total Suspended	60.0 mg/L			SM 1997 2540 D		

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(b) Exceeds Permit Limits for Average Concentration

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Control Number: 1509020210
Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
Customer Number : 2292
Report Date : 09/22/15
Composite Date: 09/14/15 -09/15/15
Sample Time : 0645-0645
Sample Type : COMP
Sample From : DAF EFFLUENT
Collected By: NF
Delivery By : KIK
Work Order :
Purchase Order :

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
09/16	0800	RHB	BOD, 5-day	444.0 mg/L	(b)		SM 2001 5210 B	6.43	92.9 *
09/17	1000	TSB	Ammonia Nitrogen	0.1 mg/L			SM 1997 4500-NH3 F	3.57	97.0 *
09/21	0830	TSB	Kjeldahl Nitrogen Total	11.20 mg/L			SM 1997 4500-NcrGB	3.88	100.3 *
09/17	1300	TSB	Nitrate Nitrogen	0.34 mg/L			SM 2000 4500-NO3 E	1.04	100.3 *
09/17	1015	TSB	Phosphorous, Total (as P)	0.2 mg/L			EPA 365.3	0.00	100.3 *
09/21	1440	KIK	Solids, Total Suspended	60.0 mg/L			SM 1997 2540 D	0.00	N/A *

* QA data shown is from a different sample or standard on the same date.
(b) Exceeds Permit Limits for Average Concentration

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Richard Broom
Environmental Services Co., Inc.

Environmental Services Company, Inc.

Corporate Office
 13715 West Markham
 Little Rock, AR 72211
 Tel. (501)221-2565 Fax (501)221-1341

Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
 Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1509020224
 Customer Name: SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number: 2292
 Report Date: 09/24/15
 Composite Date: 09/15/15 -09/16/15
 Sample Time: 0700-0700
 Sample Type: COMP
 Sample From: DAF EFFLUENT
 Collected By: NF
 Delivery By: KIK
 Work Order:
 Purchase Order:

Laboratory Analysis

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision \$ REP	Accuracy % Recovery
09/18	0800 KIK	BOD, 5-day	673.0 mg/L	(b)		SM 2001 5210 B	0.51	93.9 *
09/17	1000 TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	3.57	97.0 *
09/21	0830 TSB	Kjeldahl Nitrogen Total	6.70 mg/L			SM 1997 4500-NorgB	3.88	100.3 *
09/17	1300 TSB	Nitrate Nitrogen	0.46 mg/L			SM 2000 4500-NO3 E	1.04	100.3 *
09/17	1015 TSB	Phosphorous, Total (as P)	0.1 mg/L			EPA 365.3	0.00	100.3 *
09/21	1440 KIK	Solids, Total Suspended	20.0 mg/L			SM 1997 2540 D	12.90	N/A *

* QA data shown is from a different sample or standard on the same date.
 (b) Exceeds Permit Limits for Average Concentration

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Control Number: 1509020308
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/30/15
 Composite Date: 09/21/15 -09/22/15
 Sample Time : 0700-0630/1300
 Sample Type : COMP/GRAB
 Sample From : DAF EFFLUENT
 Collected By: NF
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision \$ RPD	Assurance Accuracy % Recovery
09/23	0800	KIK	BOD, 5-day	1790.0 mg/L	(b)		SM 2001 5210 B	4.23	96.5 *
09/23	1430	TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	1.50	101.5 *
09/24	0830	TSB	Kjeldahl Nitrogen Total	8.90 mg/L			SM 1997 4500-NorgB	3.54	97.3 *
09/23	0930	TSB	Nitrate Nitrogen	0.71 mg/L			SM 2000 4500-NO3 E	3.11	102.9 *
09/22	1300	WDS	pH	7.5 S.U.			SM 2000 4500-H+ B	0.00	N/A *
09/23	0915	TSB	Phosphorous, Total (as P)	0.3 mg/L			EPA 365.3	1.32	101.3 *
09/28	1330	KIK	Solids, Total Suspended	12.0 mg/L			SM 1997 2540 D	28.57	N/A *

* QA data shown is from a different sample or standard on the same date.
 (b) Exceeds Permit Limits for Maximum Concentration

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

Signature Richard Brown
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Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
 Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1509020364
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/28/15
 Sample Date : 09/22/15
 Sample Time : 0630
 Sample Type : GRAB
 Sample From : DAF EFFLUENT
 Collected By: NP
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis			
Analysis Date	Time By	Parameter	Result
09/25	1115	RHB Chemical Oxygen Demand	2460.0 mg/L
		Notes	Quantity
			Method
			11/2014 HACH 8000

Quality Assurance
 Precision % RPD 1.67
 Accuracy % Recovery 96.0 *

* QA data shown is from a different sample or standard on the same date.

All equipment used is checked and/or calibrated daily. All NPDES testing is conducted in accordance with 40 CFR Part 136. A minimum of 10% spiked and duplicate samples is run on each parameter where applicable for Quality Assurance purposes. Quality Assurance Plan on file with Arkansas Department of Environmental Quality. Analysis time indicates the time of the start of the analytical batch in which the specific sample was included.

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Northwest Arkansas Branch
1107 Century Avenue
Springdale, AR 72762
Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1509020317
Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
Customer Number : 2292
Report Date : 09/30/15
Composite Date: 09/22/15 -09/23/15
Sample Time : 0700-0700/1405
Sample Type : COMP/GRAB
Sample From : DAF EFFLUENT
Collected By: WDS
Delivery By : WDS
Work Order :
Purchase Order :

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
09/23	0800	KIK	BOD, 5-day	1746.0 mg/L	(b)		SM 2001 5210 B	4.23	96.5 *
09/24	1000	TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	1.48	100.4 *
09/24	0830	TSB	Kjeldahl Nitrogen Total	11.20 mg/L			SM 1997 4500-NORGB	3.54	97.3 *
09/28	1030	TSB	Nitrate Nitrogen	0.94 mg/L			SM 2000 4500-NORGB	0.00	100.5 *
09/23	1405	WDS	pH	6.2 S.U.			SM 2000 4500-H+ B	0.00	N/A *
09/28	1000	TSB	Phosphorous, Total (as P)	< 0.1 mg/L			EPA 365.3	3.35	103.8 *
09/28	1330	KIK	Solids, Total Suspended	10.0 mg/L			SM 1997 2540 D	5.13	N/A *

* QA data shown is from a different sample or standard on the same date.
(b) Exceeds Permit Limits for Maximum Concentration

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Northwest Arkansas Branch
 1107 Century Avenue
 Springdale, AR 72762
 Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1509020325 Composite Date: 09/23/15 -09/24/15 Collected By: NF
 Customer Name: SAGER CREEK VEG.CO.-WW-DAF EFF. Sample Time: 7:00-7:00/14:10 Delivery By: WDS
 Customer Number: 2292 Sample Type: COMP/GRAB Work Order:
 Report Date: 10/01/15 Sample From: DAF EFFLUENT Purchase Order:

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision \$ RPD	Accuracy % Recovery
09/25	0800	TSB	BOD, 5-Day	1913.0 mg/L	(b)		SM 2001 5210 B	4.34	104.9 *
09/25	1430	TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.30	102.3 *
09/30	1000	TSB	Kjeldahl Nitrogen Total	8.90 mg/L			SM 1997 4500-NorgB	1.32	101.0 *
09/28	1030	TSB	Nitrate Nitrogen	1.00 mg/L			SM 2000 4500-NO3 E	0.00	100.5 *
09/24	1410	WDS	PH	6.9 S.U.			SM 2000 4500-H+ B	0.00	N/A *
09/28	1000	TSB	Phosphorous, Total (as P)	< 0.1 mg/L			EPA 365.3	3.35	103.8 *
09/30	0840	KIK	Solids, Total Suspended	27.0 mg/L			SM 1997 2540 D	7.41	N/A

* QA data shown is from a different sample or standard on the same date.
 (b) Exceeds Permit Limits for Maximum Concentration

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Signature Richard Broom
 Environmental Services Co., Inc.

ATTACHMENT 4

CITY OF SILOAM SPRINGS, ARKANSAS

In the Matter of:)	
)	CEASE AND DESIST ORDER
Sager Creek Foods, Inc.)	
14961 Readings Road)	
Siloam Springs, AR 72761)	OCTOBER 7, 2015
)	
Proceedings under Siloam Springs)	
City Code Section 98-764)	

AUTHORITY

This Cease and Desist Order is issued under the authority vested in the City of Siloam Springs City Administrator pursuant to Siloam Springs City Code Section 98-764.

FINDINGS OF FACT

The City Administrator finds that Sager Creek Foods, Inc. ("Sager Creek Foods") is in violation of Pretreatment Permit No. 009, issued April 10, 2015 to Sager Creek Foods and in violation of Siloam Springs City Code Chapter 98, Article V, Industrial Pretreatment. These findings are based on the following facts:

1. Pursuant to Authorization to Discharge Wastewater Under the National Pollutant Discharge Elimination System and the Arkansas Water and Air Pollution Control Act, Permit Number AR0020273, issued to the City of Siloam Springs ("City") effective September 24, 2007 ("NPDES Permit"), the City is required to establish, implement, and enforce an industrial pretreatment program.
2. The City's Industrial Pretreatment Program was approved by Arkansas Department of Environmental Quality on August 22, 1984 and subsequently modified and approved on March 3, 2000 and on November 30, 2012. The City's Industrial Pretreatment Ordinance is set forth at City Code Chapter 98, Article V.
3. The City's Pretreatment Program implements Section 307(b) of the Federal Clean Water Act, 33, U.S.C. § 1317(b) and National Pretreatment Program requirements set forth at 40 C.F.R. Part 403.
4. Sager Creek Foods owns and operates a vegetable processing and canning plant at 14961 Readings Road, Siloam Springs, Arkansas, classified by SIC No. 2032, 2033, NAICS 311421, 311422. Sager Creek Foods is a non-domestic wastewater source in Benton County, Arkansas. Sager Creek Foods introduces pollutants within the meaning of Section 502(6) of the Federal Clean Water Act, 33 U.S.C. section 1362(6) and City Code 98-479, into the Siloam Springs sewer collection system for treatment in the Siloam Springs Wastewater Treatment Plant, which is a POTW within the meaning of Section 307(b), 33 U.S.C. section 1317(b), and National Pretreatment Program regulations at 40 C.F.R. Part 403. Sager Creek Foods is a "User" as defined in City Code 98-479.

5. On April 10, 2015, the City issued Wastewater Discharge Permit No. 009, to Sager Creek Foods authorizing the discharge of pretreated wastewater from Sager Creek Foods to the City of Siloam Springs sewer collection system and City POTW (Pretreatment Permit).
 - (a) The Pretreatment Permit sets forth numerical discharge limitations, best management practices, monitoring and recordkeeping, and notification and reporting requirements, all as required to implement the City's Pretreatment Program and the National Pretreatment Program.
 - (b) The Pretreatment Permit, Part II. Section A, requires that the permittee, Sager Creek Foods, comply with all permit conditions and applicable provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, City Code Article 98, Article V, and all orders, rules, and regulations issued pursuant to those laws.
6. The Pretreatment Permit, Part I. Section A – Discharge Limitations sets forth the following discharge limitations for discharges from Sager Creek Foods to the City POTW:

Pollutant	Daily Maximum (mg/l)	Maximum Monthly Average (mg/l)
Oil and Grease	100 mg/l	100 mg/l
pH	Between 6 – 9	N/A
Total Suspended Solids	900 mg/l	305 mg/l
BOD	900 mg/l	375 mg/l
COD	Report Only mg/l	Report Only mg/l
Maximum Discharge	1,500,000 MGD	1,500,000 MGD
Phosphorus (T)	15 mg/l	10 mg/l
Ammonia (NH ₃ -N)	20 mg/l	10 mg/l
Nitrate-Nitrogen (NO ₃)	10 mg/l	7 mg/l
Cyanide	Report only mg/l	Report only mg/l
Zinc	Report only mg/l	Report only mg/l
Copper	1.4 lbs/day	1.1660 lbs/day
Mercury	Report Only mg/l	Report Only mg/l
TKN	50 mg/l	45 mg/l

7. The Pretreatment Permit Part II. Section A, Paragraph 1 sets forth the permittee's duty to comply as follows:

The permittee must comply with all conditions of this permit and all applicable provisions of the Federal Clean Water Act, 33 U.S.C. sections 1251 et seq., the Arkansas Water and Air Pollution Control Act, Ark. State. Ann. sections 82-1901 et seq., City Ordinance No. 1084, and all orders, rules, and regulations issued pursuant to those laws. 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, for permit termination, revocation and re-issuance, or modification, or for denial of a permit renewal application.

8. The purpose and policy of the City's Industrial Pretreatment Code is to prevent the introduction of pollutants into the City POTW that will pass through or otherwise be incompatible with the wastewater treatment works. City Code 98-746.
9. The National Pretreatment Regulations at 40 C.F.R. 403.5(a)(1) prohibit an industrial user from introducing into a POTW any pollutant(s) which cause pass through or interference.
10. City Code 98-479 and the National Pretreatment Regulations at 40 C.F.R. section 403.3(p) define pass through as:

A discharge which exits the POTW into waters of the state in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirements of the POTW's NPDES permit, including an increase in the magnitude or duration of a violation.

11. City Code 98-479 and the National Pretreatment Regulations at 40 C.F.R. section 403.3(k) define interference as:

A discharge, which alone or in conjunction with a discharge or discharges from other sources, inhibits or disrupts the POTW, its treatment processes or operations or its sludge processes, use or disposal; and therefore, is a cause of a violation of the city's NPDES permit.

12. The Pretreatment Permit, Part II. Section D, Paragraph 6 requires twenty-four hour reporting as follows:

The permittee shall report any noncompliance which may endanger health or adversely affect the wastewater treatment facility. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. The City may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

The following shall be included as information which must be reported within 24 hours:

- (a) Any unanticipated bypass which exceeds any effluent limitation in the permit;

- (b) Any upset which exceeds any effluent limitation in the permit;
- (c) Violation of a maximum daily discharge limitation for any of the pollutants listed by the City in Part I of the permit; and
- (d) Any act or event which may endanger public health or adversely affect the wastewater treatment facility.

13. The Pretreatment Permit, Part II. Section D, Paragraph 1 requires notification of planned changes as follows:

Any change in the facility discharge (including the introduction of any new source of discharge or changes in the quantity or quality of discharges of pollutants) must be reported to the permitting authority. In no case are any new connections, increased flows, or significant changes permitted that will cause violation of the discharge limitations specified herein.

City Code 98-621 requires 60 days' notification to the City of planned significant changes to operations or systems which might alter the nature, quality, or volume of its wastewater discharge.

14. The Pretreatment Permit, Part II. Section D, Paragraph 2 requires advance notice of anticipated noncompliance as follows:

The permittee shall give advance notice to the City of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Such notice does not constitute any defense in any enforcement action.

15. The Pretreatment Permit, Part II. Section B, paragraph 5 and City Code 98-622 require notification of slug loading as follows:

In accordance with 40 CFR, Section 403.12(f), permittee shall notify the POTW (Phone No. 524-5623) immediately of any slug loading of any pollutant, including oxygen demanding pollutants (BOD, etc.) released to the POTW system at a flow rate and/or pollutant concentration which has the potential to cause interference with the POTW.

16. The Pretreatment Permit, Part II. Section B, Paragraph 3 requires mitigation of discharges as follows:

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health, the environment or the wastewater treatment plant. Adverse effects on the wastewater treatment plant include:

- (a) Biological upset of the plant;

- (b) Pollutant loadings to the plant causing pass through to the receiving stream;
 - (c) Pollutant loadings which interfere with normal sludge disposal; or
 - (d) Any discharge which directly or indirectly causes the plant to violate its NPDES permit.
17. On September 20, 2015 the City POTW operators noted odor at the POTW headworks. The operators checked all POTW operational parameters and confirmed the operations to be within parameters.
18. On September 23, 2015 the City POTW operators noted that the Biological Nutrient Removal (“BNR”) basin 3 experienced a change in color and responded by increasing aeration of the basin. Operators checked POTW operating parameters and confirmed operations to be within parameters. In accordance with the City’s discharge permit requirements, the City initiated collection of a composite sample at 10:00 am on September 23, 2015.
19. On September 24, 2015, the BNR basin 3 water resumed proper coloration. BNR basin coloration remained proper through September 27, 2015.
20. On September 28, 2015:
- (a) BNR basin 3 water changed color to black and effluent from the POTW was milky in color;
 - (b) The City POTW operators declared BNR basin 3 to be in upset and notified the Arkansas Department of Environmental Quality of upset;
 - (c) The City POTW operators diverted POTW influent flow to the POTW storm water basin to mitigate damage to the BNR basin and mitigate impact on effluent quality;
 - (d) The City POTW operators began operation of a second treatment train utilizing BNR basin 1 at the POTW to provide additional treatment and to mitigate the impact of upset of the BNR basin 3;
 - (e) The City POTW operators began investigation of the cause of the upset of BNR Basin 3;
 - (f) The City POTW operators' investigation included a phone call to Sager Creek Foods during which call the City was informed that Sager Creek Foods was discharging high levels of Biological Oxygen Demand (“BOD”).
21. On September 29, 2015, under authority of City Code 98-765 Emergency Suspensions, the City requested that Sager Creek Foods cease all discharges to the

City POTW. Sager Creek Foods complied with the emergency suspension request.

22. On September 29, 2015, the Oklahoma Fish and Game Commission contacted the City Wastewater Superintendent to inform him of a fish kill in Sager Creek, the POTW effluent receiving stream.
23. On September 29, 2015 representatives of the Arkansas Department of Environmental Quality (“ADEQ”) began investigation of the upset and fish kill.

FINDINGS OF VIOLATIONS

24. Sager Creek Foods violated Pretreatment Permit, Part I. Section A – Discharge Limitations as follows:

Discharge Date	BOD daily max limit 900 mg/l	BOD monthly ave limit 375 mg/l
9-22-15	1,790.0	
9-23-15	1746.0	
9-24-15	1,913.0	
September		668

Analytical laboratory reports provided by Sager Creek Foods documenting the above discharges are in Exhibit A.

25. Sager Creek Foods failed to report the above discharges pursuant to Pretreatment Permit, Part II. Section D, Paragraph 6 requiring twenty-four hour reporting of any noncompliance which may endanger health or adversely affect the wastewater treatment facility thus violating the Pretreatment Permit.
26. Sager Creek Foods failed to notify the City of planned changes as required by Pretreatment Permit, Part II. Section D, Paragraph 1 thus violating the Pretreatment Permit and failed to notify the City of any planned changes in operations or the discharger’s system which might alter the nature, quality, or volume of wastewater discharge as required by City Code 98-621 thus violating the City Code 98-621.
27. Sager Creek Foods failed to notify the City of potential problems pursuant to City Code 98-622 which requires that a discharger immediately telephone and notify the City of any discharge, including, but not limited to accidental discharges, discharges of a nonroutine, episodic nature, a noncustomary batch discharge, or a slug load, that may cause potential problems for the POTW, thus violating City Code 98-622.
28. Sager Creek Foods failed to notify the City of slug loading pursuant to Pretreatment Permit, Part II. Section B, paragraph 5 thus violating the Pretreatment Permit and City Code 98-622.

29. Sager Creek Foods failed to take mitigating measures in response to the discharges documented above in violation of the duty to mitigate mandated by Pretreatment Permit Part II. Section B, paragraph 3, thus violating the Pretreatment Permit.

ORDER

30. Sager Creek Foods is ordered to cease all discharges into the City's POTW except as provided in this Cease and Desist Order and the Pretreatment Permit.
31. The discharge requirements in this Cease and Desist Order supersede discharge requirements of the Pretreatment Permit Part I, Section A for maximum discharge flow and discharge limitations for BOD to the extent that this Cease and Desist Order imposes alternative requirements. All other provisions of the Pretreatment Permit remain in full force and effect.
32. Discharge from Sager Creek Foods to the City POTW is prohibited until 1:00 pm October 8, 2015.
33. Beginning 1:00 pm October 8, 2015 and until October 30, 2015, Sager Creek Foods may discharge pretreated wastewater to the City POTW as follows:

- (a) Discharge limits:

<u>Parameter</u>	<u>Maximum Discharge</u>
Flow	750,000 gallons per day
BOD	1125 mg/l

- (b) Monitoring requirements for discharges authorized above:

Flow shall be monitored with a magnetic flow meter and recorded daily. BOD shall be monitored daily with 24 hour time composite flow proportional sampling representative of the discharges authorized above. Monitoring procedures of the Pretreatment Permit shall be implemented.

- (c) Monitoring requirement for Chemical Oxygen Demand ("COD"). On each 24 hour time composite flow proportional sample collected pursuant to paragraph 33(b) above, Sager Creek Foods shall within 12 hours after sample collection perform a COD analysis and shall report the COD analysis to the Siloam Springs Wastewater Superintendent by telephone at 479-228-0934 and email tmyers@siloamsprings.com within the 12 hour period.

- (d) Monitoring data shall be reported to the City as follows:

- (i) Sager Creek Foods shall send an email to the Siloam Springs Wastewater Superintendent at tmyers@siloamsprings.com by 9:00am each day with the flow data for the preceding day.

- (ii) Sager Creek Foods shall request that its contract laboratory provide a verbal report of the data to the Siloam Springs Wastewater Superintendent at 479-228-0934 as soon as analytical information becomes available. If the Wastewater Superintendent does not answer the telephone, the contract laboratory shall leave a message indicating that analyses are available and shall send an email to the Wastewater Superintendent at tmyers@siloamsprings.com providing the analytical information.
 - (iii) Sager Creek Foods shall request that its contract laboratory directly email all analytical reports of Sager Creek Foods wastewater analysis directly to the Wastewater Superintendent at tmyers@siloamsprings.com.
 - (iv) In addition, all reporting requirements of the Pretreatment Permit shall be followed.
34. If at any time Sager Creek Foods violates the terms of this Cease and Desist Order or the Pretreatment Permit the City will issue an Emergency Suspension of discharge pursuant to City Code 98-765.
35. No later than 5:00 pm on October 30, 2015 Sager Creek Foods shall demonstrate compliance with the Pretreatment Permit BOD daily maximum limit of 900 mg/l and all other requirements of the Pretreatment Permit and City Code Chapter 98, Article V. If Sager Creek Foods does not make such demonstration, the City will issue an order terminating the discharge from Sager Creek Foods to the City collection system and POTW.

RESERVATION OF ASSESSMENT OF
ADMINISTRATIVE PENALTY
AND COSTS

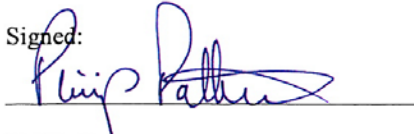
36. Administrative penalties, costs for responding to the unauthorized discharges and Pretreatment Permit violations, and costs for preparing this Cease and Desist Order and subsequent orders will be assessed in an Administrative Penalty Order that will be issued separately from this Cease and Desist Order.

EFFECT OF ORDER

37. This Order is not and shall not be interpreted to be a pretreatment permit or in any way extinguish, waive, satisfy, or otherwise affect the obligation of Sager Creek Foods to comply with the Federal Clean Water Act, the Arkansas Water and Air

Pollution Control Act, the City Code Industrial Pretreatment Program, or the Pretreatment Permit.

38. This Order takes effect upon signature.

Signed: 

Dated:

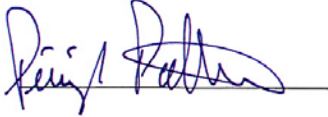
October 7, 2015

Phillip Patterson,
City Administrator
City of Siloam Springs, Arkansas

CERTIFICATE OF SERVICE

I CERTIFY that this Cease and Desist Order was personally served on Mike of Sager
Creek Foods, Inc. on October 7, 2015. Zelkind

Signed:



Phillip Patterson
City Administrator
City of Siloam Springs, Arkansas