



**A R K A N S A S**  
Department of Environmental Quality

**OFFICE OF WATER INSPECTION REPORT**

AFIN: <b>66-01652</b>	PERMIT #: <b>AR0021750</b>	DATE: <b>6/6/2017</b>
COUNTY: <b>66 Sebastian</b>	PDS #: <b>097829</b>	MEDIA: <b>WN</b>
GPS LAT: <b>35.367778</b> LONG: <b>-94.428531</b> LOCATION: <b>Entrance</b>		

FACILITY INFORMATION		INSPECTION INFORMATION			
NAME: <b>Twin Rivers Foods, Inc.</b> LOCATION: <b>608 Navy Road</b> CITY: <b>Fort Smith</b>		FACILITY TYPE: <b>2 - Industrial</b>		INSPECTOR ID#: <b>71330 S - State</b>	
		FACILITY EVALUATION RATING: <b>2 - Marginal</b>		INSPECTION TYPE: <b>Industrial User</b>	
		DATE(S): <b>6/6/2017</b>	ENTRY TIME: <b>15:00</b>	EXIT TIME: <b>15:45</b>	PERMIT EFFECTIVE DATE: <b>2/1/2015</b>
		PERMIT EXPIRATION DATE: <b>1/31/2020</b>			
RESPONSIBLE OFFICIAL		FAYETTEVILLE SHALE RELATED: <b>N</b>			
NAME / TITLE: <b>Carl Geffken / City Administrator</b> COMPANY: <b>Fort Smith, City of</b> MAILING ADDRESS: <b>P.O. Box 1908</b> CITY, STATE, ZIP: <b>Fort Smith AR 72902</b> PHONE & EXT. / FAX: <b>479-494-3908 /</b> EMAIL: <b>Imcavoy@fortsmithar.gov</b>		FAYETTEVILLE SHALE VIOLATIONS: <b>N</b>			
CONTACTED DURING INSPECTION: <b>Yes</b>		INSPECTION PARTICIPANTS			
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: <b>John Hancock/Supervisor Environmental Monitoring/479.784.2335/jhancock@fortsmithar.gov</b> <b>Don Clover/Program Manager Environmental Quality/479.784.2337/dclover@fortsmithar.gov</b> <b>Chris Cooper/Pretreatment Coordinator/479.784.1019/ccoop@fortsmithar.gov</b> <b>Kerri McCabe/ADEQ Inspector Supervisor/501.682.0642/mccabe@adeq.state.ar.us</b> <b>Jesus Sanchez/Plant Manager/479.785.2600/jsanchez@2river.com</b> <b>Ernesto Mendoza/Operator</b>			

AREA EVALUATIONS					
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)					
**	PERMIT	**	FLOW MEASUREMENT	**	STORMWATER
**	RECORDS/REPORTS	**	LABORATORY	**	FACILITY SITE REVIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/RECEIVING WATER	**	SELF-MONITORING PROGRAM
**	SAMPLING	**	SLUDGE HANDLING/DISPOSAL	<b>M</b>	PRETREATMENT
**	OTHER:				

**SUMMARY OF FINDINGS**

No violations of the application and enforcement of the City of Fort Smith's Pretreatment Program were noted during inspection. The Industrial User (IU) is currently non-compliant with the City's program requirements, and an Administrative Order (AO) and compliance schedule have been issued by the City in accordance with its pretreatment program procedures.



**GENERAL COMMENTS**

I inspected this facility with the above-referenced inspection participants on June 6, 2017. Inspection consisted of a pretreatment plant assessment and discussion designed to ascertain the IU's familiarity with the City's pretreatment program.

The pretreatment facility was unclean and in disrepair. The Operator though passionate about his facility and proud to share it during our inspection was not a licensed operator. Lime is added to the wastewater at the headworks and is not being adequately removed through the treatment process. As a result, lime buildup was observed in the outfall manhole during inspection. This facility is in "Non-Compliant" status with the POTW. The City has issued an AO (No. 16-001) and has given them a three year compliance schedule for completion of a corrective action plan. This compliance schedule is outlined in the IU's current permit (Permit #: SIUP00196; effective January 9, 2017) and was reviewed during inspection. City pretreatment personnel informed that the compliance scheduled was being adhered to by the IU at the time of the inspection.

During inspection, it was noted that the facility is conducting industrial activities without coverage under the Industrial Stormwater General Permit (IGP; ARR000000) required under the National Pollutant Discharge Elimination System and the Arkansas Water and Air Pollution Control Act and administered by the Arkansas Department of Environmental Quality. A separate report will be submitted to the facility advising them of their requirement to obtain coverage under the IGP.

Facility personnel were knowledgeable of the City of Fort Smith's pretreatment requirements and of their obligations under the program. Nothing of concern related to the City's application, oversight, and enforcement of the pretreatment program was noted during inspection.

INSPECTOR'S SIGNATURE:  Danielle Gray	DATE: 6/14/2017
SUPERVISOR'S SIGNATURE:  Kerri McCabe	DATE: 6/29/2017

Inspection Report: **Twin Rivers Foods, Inc.**, AFIN: **66-01652**, Permit #: **AR0021750**  
**POTW Pretreatment Program**

**Industrial Site Visit**

**Name of Industry:** Twin Rivers Foods, Inc.

**Industry Contacts:** Jesus Sanchez, Plant Manager, 479.274.7589 cell, 479.785.2600 office  
 Ernesto Mendoza, Pretreatment Plant Operator

**Type of Industry:** Poultry processing

**Date of Visit:** June 6, 2017

1.	Significant industrial user?	<u>  X  </u>	Yes	<u>      </u>	No	<u>      </u>	NA
2.	Pretreatment equipment or procedures?	<u>  X  </u>	Yes	<u>      </u>	No	<u>      </u>	NA
3.	Pretreatment equipment maintained and operational? (see note below)	<u>      </u>	Yes	<u>  X  </u>	No	<u>      </u>	NA
4.	Hazardous waste generated or stored?	<u>      </u>	Yes	<u>  X  </u>	No	<u>      </u>	NA
5.	Proper solid waste disposal?	<u>  X  </u>	Yes	<u>      </u>	No	<u>      </u>	NA
6.	Solvent management/TTO control?	<u>      </u>	Yes	<u>      </u>	No	<u>  X  </u>	NA
7.	Suitable sampling location?	<u>  X  </u>	Yes	<u>      </u>	No	<u>      </u>	NA
8.	Appropriate self-monitoring procedures/equipment?	<u>      </u>	Yes	<u>  X  </u>	No	<u>      </u>	NA
9.	Adequate spill prevention?	<u>  X  </u>	Yes	<u>      </u>	No	<u>      </u>	NA
10.	Industry familiar with limits and requirements?	<u>  X  </u>	Yes	<u>      </u>	No	<u>      </u>	NA

**Additional Comments:** The treatment plant is in disrepair. Further, a lime coating was noted in the outfall surrounding the flow channel. The Operator informed that this is the result of lime injected into the wastewater at headworks that is not being adequately removed prior to discharge. This facility is in "Non-Compliant" status with the POTW. The City has issued an AO and has given them a three year compliance schedule for completion of a corrective action plan. This compliance schedule is outlined in the IU's current permit and was reviewed during inspection.

The facility is conducting industrial activities without coverage under the Industrial Stormwater General Permit (IGP; ARR000000) required under the National Pollutant Discharge Elimination System and the Arkansas Water and Air Pollution Control Act and administered by the Arkansas Department of Environmental Quality. A separate report will be submitted to the facility advising them of their requirement to obtain coverage under the IGP.

**Visit Conducted By:** Dannielle Gray

**Date of Report:** June 14, 2017

**Office of Water Photographic Evidence Sheet**

Location:	<b>Twin Rivers Foods, Inc.</b>				
Photographer:	<b>Dannielle Gray</b>	Date:	<b>6/6/2017</b>	Time:	<b>1506</b>
Witness:	<b>Kerri McCabe, John Hancock, Don Glover, Chris Cooper, Ernesto Mendoza</b>			Photo #:	<b>1</b>
Description:	<b>Process water influent</b>				



Photographer:	<b>Dannielle Gray</b>	Date:	<b>6/6/2017</b>	Time:	<b>1506</b>
Witness:	<b>Kerri McCabe, John Hancock, Don Glover, Chris Cooper, Ernesto Mendoza</b>			Photo #:	<b>2</b>
Description:	<b>Influent screening</b>				





**Office of Water Photographic Evidence Sheet**

Location:	<b>Twin Rivers Foods, Inc.</b>		
Photographer:	<b>Dannielle Gray</b>	Date:	<b>6/6/2017</b>
Witness:	<b>Kerri McCabe, John Hancock, Don Glover, Chris Cooper, Ernesto Mendoza</b>	Time:	<b>1507</b>
Description:	<b>Combined equalization tank and aeration tank; lime injection occurs here as well.</b>		



Photographer:	<b>Dannielle Gray</b>	Date:	<b>6/6/2017</b>
Witness:	<b>Kerri McCabe, John Hancock, Don Glover, Chris Cooper, Ernesto Mendoza</b>	Time:	<b>1508</b>
Description:	<b>Ionic and cationic mixing tank (photo center; silver tank by eye wash station).</b>		





**Office of Water Photographic Evidence Sheet**

Location:	<b>Twin Rivers Foods, Inc.</b>		
Photographer:	<b>Dannielle Gray</b>	Date:	<b>6/6/2017</b>
Witness:	<b>Kerri McCabe, John Hancock, Don Glover, Chris Cooper, Ernesto Mendoza</b>	Time:	<b>1507</b>
Description:	<b>DAF Unit</b>	Photo #:	<b>5</b>



Photographer:	<b>Dannielle Gray</b>	Date:	<b>6/6/2017</b>
Witness:	<b>Kerri McCabe, John Hancock, Don Glover, Chris Cooper, Ernesto Mendoza</b>	Time:	<b>1512</b>
Description:	<b>Sludge collection tank; sludge is hauled away and land applied by contractor.</b>		





**Office of Water Photographic Evidence Sheet**

Location:	<b>Twin Rivers Foods, Inc.</b>		
Photographer:	<b>Dannielle Gray</b>	Date:	<b>6/6/2017</b>
Witness:	<b>Kerri McCabe, John Hancock, Don Glover, Chris Cooper, Ernesto Mendoza</b>	Time:	<b>1515</b>
Description:	<b>Flowmeter</b>	Photo #:	<b>7</b>



Photographer:	<b>Dannielle Gray</b>	Date:	<b>6/6/2017</b>
Witness:	<b>Kerri McCabe, John Hancock, Don Glover, Chris Cooper, Ernesto Mendoza</b>	Time:	<b>1514</b>
Description:	<b>Outfall and monitoring location. Note lime buildup on flow channel.</b>		





Figure 1. Google Earth image dated March 20, 2016 showing facility overview and pretreatment plant location.

