



ARKANSAS

ENERGY & ENVIRONMENT

August 28, 2023

Mr. Richard Taylor, Quality Manager
Turkey Hill, LLC
205 S. Spring St.
Searcy, AR 72143

RE: Turkey Hill, LLC Inspection – Searcy WWTF Pretreatment Compliance Inspection
AFIN: 73-00055 Permit No.: AR0021601

Dear Mr. Taylor:

On August 24, 2023, I performed an Industrial User 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. This inspection was conducted in coordination with a Pretreatment Compliance Inspection of the Searcy Waste Water Treatment Facility (WWTF). A copy of the inspection report is enclosed for your records.


No violations were noted at the time of the inspection. Please refer to the inspection report for any comments. If I can be of any assistance, please contact me at Jason.Bolenbaugh@adeq.state.ar.us or 501-682-0659.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jason R. Bolenbaugh'.

Jason Bolenbaugh
Compliance Branch Manager, Office of Water Quality
5301 Northshore Drive, North Little Rock, AR, 72118

CC: Jimmy Smith, Manager, Searcy WWTP, j.smith@searcywater.org
Brady Anderson, PT Coordinator, Searcy WWTP, b.anderson@searcywater.org

 ENVIRONMENTAL QUALITY	OFFICE OF WATER QUALITY		
	INSPECTION REPORT		
	AFIN: 73-00055	PERMIT #: AR0021601	DATE: 8/24/2023
	COUNTY: 73 White	PDS #: 127216	MEDIA: WN
GPS LAT: 35.247558 LONG: -91.737900 LOCATION: Entrance			

FACILITY INFORMATION	INSPECTION INFORMATION
NAME: Turkey Hill, LLC LOCATION: 205 S. Spring St. CITY: Searcy	FACILITY TYPE: 2 - Industrial INSPECTOR ID#: 83321 S - State FACILITY EVALUATION RATING: *** INSPECTION TYPE: Industrial User DATE(S): 8/24/2023 ENTRY TIME: 09:40 EXIT TIME: 10:22 PERMIT EFFECTIVE DATE: PERMIT EXPIRATION DATE: FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N
RESPONSIBLE OFFICIAL	INSPECTION PARTICIPANTS
NAME / TITLE Mr. Richard Taylor / Quality Manager COMPANY: Turkey Hill, LLC MAILING ADDRESS: 205 S. Spring St. CITY, STATE, ZIP: Searcy AR 72143 PHONE & EXT: / FAX: EMAIL: CONTACTED DURING INSPECTION: Yes	NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Richard Taylor, Quality Manager, Turkey Hill, LLC Brady Anderson, PT Coordinator, Searcy WWTF Nathan Spencer, Operator, Searcy WWTF

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	**	PRETREATMENT
**	OTHER:				


SUMMARY OF FINDINGS

Sample results from the May 23, 2023 composite sampling event revealed the facility's discharge had a BOD and TSS levels greater than 40,000 mg/l. During discussions with the Searcy WWTF pretreatment staff it was determined this discharge constituted a slug load and per Part 3.G of the below referenced pretreatment permit, the slug load should have been reported immediately to the Searcy WWTF pretreatment staff. In accordance with the pretreatment ordinance the Searcy WWTF pretreatment staff will issue a Notice of Violations to Turkey Hill, LLC for the slug load discharge. In response, Turkey Hill, LLC indicated they will continue to evaluate operational records to try and determine how what may have caused the excessive discharge of BOD and TSS. Because samples are only required twice per month and can take more than five days to receive results, it was stressed to Turkey Hill, LLC operational staff that if they believe a slug load has been sent to the collection system that they immediately contact the Searcy WWTF staff. During the inspection we discussed Turkey Hill, LLC and the Searcy WWTF may need to consider how much BOD and/or TSS would be considered a slug load. Although the permit has established discharge limitation for BOD and TSS, per Part 3.F of the permit, these constituents are not for compliance purposes and therefore a surcharge is given to Turkey Hill, LLC in accordance with Ordinance #679.

GENERAL COMMENTS

The Industrial User inspection was conducted as part of a Pretreatment Compliance Inspection (PCI) of the Searcy Board of Public Utilities/Searcy WWTF (Permit AR0021601/AFIN 73-00055). This inspection will be logged under NPDES Permit AR0021601 given it is part of the PCI and not an inspection solely of Turkey Hill, LLC.

The facility was issued a pretreatment permit by the Searcy Board of Public Utilities pretreatment program. The Permit Number is 3202401 and it was issued on March 16, 2023 and expires on March 15, 2026. The facility does not pretreat any of the wastewater that is discharged to the facility. All wastewater enters floor drains with the production area and discharges directly to the collection system. Samples are taken from a manhole located on the east side of the facility and in the middle of Spring St. Wastewater consists of wash down from ice cream equipment, tanker trucks, boiler blowdown, and sanitary waste. When wastewater is sent to the collection system the facility will meter the water in rather than sending one large batch all at once. Some of the equipment cleaning processes use bursts of water and cleaning agents which helps ensure the wastewater is not sent all at once.

INSPECTOR'S SIGNATURE: <small>←Click text to left to add signature</small>	-Inspector Name	DATE:
SUPERVISOR'S SIGNATURE: 	Jason Bolenbaugh	DATE: 8/25/2023

Industrial User Site Visit

Name of Industry: Turkey Hill, LLC

Industry Contacts: Mr. Richard Taylor, Quality Manager

Type of Industry: Ice Cream Manufacturer

Date of Visit: August 24, 2023

- | | | | | |
|-----|--|---|-----------------------------|---|
| 1. | Significant industrial user: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 2. | Pretreatment equipment or procedures? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 3. | Pretreatment equipment maintained and operational? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 4. | Hazardous waste generated or stored? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 5. | Proper solid waste disposal? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 6. | Solvent management/TTO control? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 7. | Suitable sampling location? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 8. | Appropriate self-monitoring procedures/equipment? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 9. | Adequate spill prevention? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |
| 10. | Industry familiar with limits and requirements? | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> N/A |

Additional Comments: This facility does not have a pretreatment system. Wastewater is discharged through floor drains to the Searcy WWTF collection system. No hazardous waste is generated at the facility. Representatives may want to review the permit and discuss with the Searcy WWTF regarding slug load reporting requirements.