

## Anderson, Alan

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**From:** Tom Myers <tmyers@siloamsprings.com>  
**Sent:** Wednesday, September 30, 2015 4:25 PM  
**To:** Anderson, Alan; Johnson, Miles  
**Cc:** Steven Gorszczyk; West, Alison  
**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](mailto:tmyers@siloamsprings.com)

## Anderson, Alan

---

**From:** Bolenbaugh, Jason  
**Sent:** Thursday, October 01, 2015 2:49 PM  
**To:** Keogh, Becky; Harrelson, Tammy; Carpenter, Ellen  
**Cc:** Shafii, Mo; Healey, Richard; Clem, Sarah; Wentz, Tate; Anderson, Alan; Ungerank, Colby; Bailey, John  
**Subject:** FW: Plant Up Set Siloam Springs Arkansas  
**Attachments:** Sager Creek Foods Reports RE Wastewater Plant Upset.pdf

Director Keogh,

Below is an email from Thomas Meyers with the City of Siloam Springs that documents the type of discharge Sager Creek had sent to the city's treatment plant. Inspectors Alison West and Matt Holden are going to go back to the treatment plant tomorrow morning. Please let me know if you have any questions.

Thanks,

### Jason Bolenbaugh

Inspection Branch Manager  
ADEQ Water Division  
Phone: 501-682-0659  
[bolenbaugh@adeq.state.ar.us](mailto:bolenbaugh@adeq.state.ar.us)

---

**From:** West, Alison  
**Sent:** Thursday, October 01, 2015 2:02 PM  
**To:** Bolenbaugh, Jason  
**Subject:** FW: Plant Up Set Siloam Springs Arkansas

---

**From:** Tom Myers [<mailto:tmyers@siloamsprings.com>]  
**Sent:** Thursday, October 01, 2015 1:59 PM  
**To:** Anderson, Alan; Johnson, Miles  
**Cc:** Steven Gorszczyk; West, Alison  
**Subject:** FW: Plant Up Set Siloam Springs Arkansas

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](mailto:tmyers@siloamsprings.com)

---

**From:** Tom Myers  
**Sent:** Wednesday, September 30, 2015 4:27 PM  
**To:** Anderson, Alan ([ANDERSON@adeq.state.ar.us](mailto:ANDERSON@adeq.state.ar.us)); 'JohnsonM@adeq.state.ar.us'  
**Cc:** Steven Gorszczyk; [west@adeq.state.ar.us](mailto: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.

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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,

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Wastewater Superintendent  
City of Siloam Springs  
Ph:479-524-5623  
Cell:479-228-0934  
[tmyers@siloamsprings.com](mailto:tmyers@siloamsprings.com)

# 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: 1509020358  
 Customer Name : SAGER CREEK VEG. CO.-LAGOON  
 Customer Number : 1381  
 Report Date : 09/29/15

Sample Date : 09/21/15  
 Sample Time : 1215  
 Sample Type : GRAB  
 Sample From : LAGOON

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
09/29	0815	KIK Alkalinity (as CaCO3)	420.00 mg/L			SM 1997 2320 B	2.06	0.0 *
09/23	0800	KIK BOD, 5-day	2411.0 mg/L			SM 2001 5210 B	2.06	96.5 *
09/25	1115	RHB Chemical Oxygen Demand	5020.0 mg/L			11/2014 HACH 8000	1.67	96.0 *
09/21	1215	WDS Dissolved Oxygen	0.4 mg/L			SM 2001 4500-O G	0.00	N/A
09/24	0830	TSB Kjeldahl Nitrogen Total	67.20 mg/L			SM 1997 4500-NOTGB	3.54	97.3 *
09/21	1215	WDS pH	5.8 S.U.			SM 2000 4500-H+ B	0.00	N/A
09/28	1330	KIK Solids, Total Suspended	2300.0 mg/L			SM 1997 2540 D	5.36	N/A *
09/23	0930	TSB Nitrate + Nitrite	1.9 mg/L			SM 2000 4500-NO3 E	3.11	102.9 *
09/23	0800	KIK Soluble BOD	1728.0 mg/L			SM 2001 5210 B	3.39	96.5 *

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

All equipment used is checked and/or calibrated daily. All NPPDS 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  
 Environmental Services Co., Inc.

Environmental Services Company, Inc.  
 Northwest Arkansas  
 1107 Century Street  
 Springdale, Arkansas 72762  
 website: www.esclabs.com



Corporate Office, Little Rock, Arkansas  
 501-221-2565  
 Carlshad, New Mexico  
 575-887-1ESG

Phone: 479-750-1170 Fax: 479-750-1172

**CHAIN OF CUSTODY**

Client Information				Project Information				Requested Parameters			
Company Name:		Sager Creek Vegetable Co.		Permit/Project #:				pH(23), BOD(3), SBOD(99.7)			
Address:		P.O. Box 250 Siloam Springs AR		Purchase Order #:				TSS(28), DO (10), Alkalinity (2)			
Telephone:		479-524-6431		Sampler Name(s):		M. Seaman		COD(6), TKN (16.A)			
FAX:		479-524-8699		and Signature(s):		[Signature]		Nitrate + Nitrite (91)			
ESC Client Number:		1381									
Sample Identification		Sample Collection			Sample Containers						
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#		
Lagoon	1509020358	9-21-15	12:15	Grab	Water	plastic	1qt	None/ice	1	X	X
Lagoon				Grab	Water	plastic	8oz	H2SO4, pH <2	1	X	X
Requested By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Custody Seals:			
[Signature]		9/21/15	13:10	[Signature]				Used?	Intact?		
Requested By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Used?	Intact?		
[Signature]				[Signature]				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Comments:											
Cool all samples to 4 degrees C.											

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 Springdale, AR 72762  
 Tel. (479) 750-1170 Fax (479) 750-1172

Control Number: 1509020296  
 Customer Name: SAGER CREEK VEG. CO.-LAGOON  
 Customer Number: 1381  
 Report Date: 09/24/15

Sample Date: 09/16/15  
 Sample Time: 1944  
 Sample Type: GRAB  
 Sample From: LAGOON

Collected By: MF  
 Delivery By: KIK  
 Work Order:  
 Purchase Order:


**Analysis**

**Laboratory Analysis**

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
09/18	0800	KIK	BOD, 5-day	1482.0 mg/L			SM 2001 5210 B	0.51	93.9 *
09/18	1300	RHB	Chemical Oxygen Demand	4290.0 mg/L			11/2014 HACH 8000	1.57	100.4 *
09/18	1610	TSB	Ammonia Nitrogen	2.3 mg/L			SM 1997 4500-NH3 F	1.97	97.0 *
09/21	0830	TSB	Kjeldahl Nitrogen Total	79.50 mg/L			SM 1997 4500-NorgB	3.88	100.3 *
09/18	1500	TSB	Nitrate Nitrogen	1.20 mg/L			SM 2000 4500-NO3 E	1.32	100.8 *
09/21	1030	TSB	Phosphorous, Total (as P)	10.2 mg/L			EPA 365.3	0.00	101.0 *
09/21	1440	KIK	Solids, Total Suspended	1750.0 mg/L			SM 1997 2540 D	13.33	101.0 *
09/18	0800	KIK	Soluble BOD	906.0 mg/L			SM 2001 5210 B	19.83	93.9 *

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Tel. (479) 750-1170 Fax (479) 750-1172

Control Number: 1509020297  
Customer Name: SAGER CREEK VEG. CO. - PLNT RAW PIT  
Customer Number: 2334  
Report Date: 09/24/15

Sample Date: 09/16/15  
Sample Time: 1939  
Sample Type: GRAB  
Sample From: PLANT RAW PIT

Collected By: NF  
Delivery By: KIK  
Work Order:  
Purchase Order:

Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision	Quality Assurance
09/18	0800	KIK	BOD, 5-day	5511.0 mg/L			SM 2001 5210 B	0.51	93.9
09/18	1300	RHB	Chemical Oxygen Demand	8950.0 mg/L			11/2014 HACH 8000	1.57	100.4 *
09/18	1610	TSB	Ammonia Nitrogen	3.9 mg/L			SM 1997 4500-NH3 F	1.97	97.0 *
09/21	0830	TSB	Kjeldahl Nitrogen Total	45.90 mg/L			SM 1997 4500-NOrgB	3.88	100.3 *
09/18	1500	TSB	Nitrate Nitrogen	17.60 mg/L			SM 2000 4500-NO3 E	1.32	100.8 *
09/21	1030	TSB	Phosphorous, Total (as P)	7.6 mg/L			EPA 365.3	0.00	101.0 *
09/21	1440	KIK	Solids, Total Suspended	1140.0 mg/L			SM 1997 2540 D	13.33	N/A *
09/18	0800	KIK	Soluble BOD	4270.0 mg/L			SM 2001 5210 B	19.83	93.9

Laboratory Analysis

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Signature

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 Northwest Arkansas  
 1107 Century Street  
 Springdale, Arkansas 72762  
 website: www.esclabs.com



Corporate Office, Little Rock, Arkansas  
 501-221-2565  
 Carlsbad, New Mexico  
 575-887-1EESC

Phone: 479-750-1170 Fax: 479-750-1172

**CHAIN OF CUSTODY**

Client Information				Project Information				Requested Parameters			
Company Name:		Sager Creek Vegetable Co.		Permit/Project #:				BOD(3), TSS(28), SBOD(99.7)			
Address:		P.O. Box 250 Siloam Springs AR		Purchase Order #:				NH3 (15.A), NO3 (18), P (25)			
Telephone:		479-524-6431		Sampler Name(s):		NATHAL FLOREZ		TKN (16.A), COD (6)			
FAX:		479-524-8699		and Signature(s):							
ESC Client Number:		1381 / 2334									
Sample Identification			Sample Collection			Sample Containers					
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#		
Lagoon	1509020296	9/16/15	1944	Grab	Water	plastic	1 qt	None, cool < 6°C	1	X	
Lagoon				Grab	Water	plastic	1 qt	H <sub>2</sub> SO <sub>4</sub> , ph < 2	1		X
Plant Raw Pit	1509020297	9/16/15	1939	Grab	Water	plastic	1 qt	None, cool < 6°C	1	X	
Plant Raw Pit				Grab	Water	plastic	1 qt	H <sub>2</sub> SO <sub>4</sub> , ph < 2	1		X
Retransmitted By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Custody Seals:			
<i>[Signature]</i> KELLY KENNEDY		9-17-15	1616	<i>[Signature]</i> KELLY KENNEDY		9-17-15	1930	Used? <input checked="" type="checkbox"/> Intact? <input type="checkbox"/>			
Retransmitted By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Turnaround: Regular <input checked="" type="checkbox"/> Special <input type="checkbox"/>			
<i>[Signature]</i> KELLY KENNEDY		9-17-15	1616	<i>[Signature]</i> KELLY KENNEDY		9-17-15	1616	Were samples properly preserved? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
Comments:				FLOW DATA				pH: _____			
				Temp: _____				DO: _____			
				Units: _____				Chlorinated? Yes No			
				Cool all samples to 4 degrees C.				This Document is Page ___ of ___			



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 Little Rock, AR 72211  
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Northwest Arkansas Branch  
 1107 Century Avenue  
 Springdale, AR 72762  
 Tel. (479)750-1170 Fax (479)750-1172

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	Quality Assurance & Recovery
09/23	0800	KTK	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	KTK	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 EFP.  
 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: NF  
 Delivery By: WDS  
 Work Order:  
 Purchase Order:

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision & RPD	Accuracy & Recovery
09/25	1115	RHB	Chemical Oxygen Demand	2460.0 mg/L		11/2014 HACH 8000	1.67	96.0 *

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Corporate Office, Little Rock, Arkansas  
 501-221-2565  
 Carlspad, New Mexico  
 575-887-1E5C

Phone: 479-750-1170 Fax: 479-750-1172

### CHAIN OF CUSTODY

Client Information				Project Information				Requested Parameters			
Company Name:		Sager Creek Vegetable Co.		Permit/Project #:				pH (23)		<input checked="" type="checkbox"/>	
Address:		P.O. Box 250 Siloam Springs AR		Purchase Order #:				BOD (3), TSS (28)		<input checked="" type="checkbox"/>	
Telephone:		479-524-6431		Sampler Name(s):		Walker Foy		TKN(16.A), TP(25), NH3N(15.A), NO3(18)		<input checked="" type="checkbox"/>	
FAX:		479-524-8699		and Signature(s):				Cu (29.HW), (00.MD)		<input type="checkbox"/>	
ESC Client Number:		2292						O&G (21)		<input type="checkbox"/>	
Sample Identification		Sample Collection		Sample Containers				COD (6) <th colspan="2"><input type="checkbox"/> </th>		<input type="checkbox"/>	
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	Zn(30.HW), Hg(50.15), (00.HG)	<input type="checkbox"/>
DAF Effluent	1509020308	9-22-15	13:00	Grab	Water	teflon	100ml	None	1	Cyanide (9)	<input type="checkbox"/>
DAF Effluent		9-22-15	6:30	Comp	Water	plastic	1qt	None, cool < 6°C	1		<input type="checkbox"/>
DAF Effluent		9-22-15	6:30	Comp	Water	plastic	8 oz	H2SO4, pH < 2	1		<input type="checkbox"/>
DAF Effluent				Comp	Water	plastic	8 oz	HNO3, pH < 2	1		<input type="checkbox"/>
DAF Effluent				Grab	Water	glass	1qt	H2SO4, pH < 2	1		<input type="checkbox"/>
DAF Effluent	1509020364	9-22-16	6:30	Grab	Water	plastic	8 oz	H2SO4, pH < 2	1		<input checked="" type="checkbox"/>
DAF Effluent				Grab	Water	plastic	1qt	NaOH	1		<input type="checkbox"/>
Requested By: (Signature and Printed Name)		Date	Time	Received By: (Signature and Printed Name)		Date	Time	Custody Seals:			
		9-22-15	13:00			9-22-15	13:00	Used? <input checked="" type="checkbox"/>		Indict? <input type="checkbox"/>	
Relinquished By: (Signature and Printed Name)		Date	Time	Received by: (Signature and Printed Name)		Date	Time	Turnaround:		Special	
		9-22-15	15:40			9-22-15	15:40	Regular <input checked="" type="checkbox"/>		Were samples properly preserved: <input checked="" type="checkbox"/>	
Comments:		Start Temp: 32°		End Temp: 30°		Flow Data		Field Test		pH: 7.5	
								Time: 13:00		Temp.: 22.5	
								DO: 2.5		Result: 2.5	
								Debris:		Units: °F	
								Chlorinated? Yes No		This Document is Page ___ of ___	

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

Control Number: 1509020317  
 Customer Name : SAGER CREBEK 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 :

**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-NO3 E	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 *

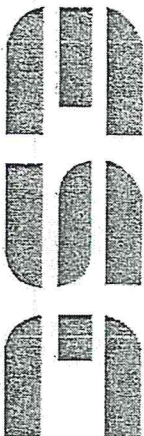
**Laboratory Analysis**

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 (b) Exceeds Permit limits for Maximum Concentration

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### CHAIN OF CUSTODY

Client Information				Project Information				Requested Parameters					
Company Name:		Sager Creek Vegetable Co.		Permit/Project #:				pH (23)					
Address:		P.O. Box 250 Silviam Springs AR		Purchase Order #:				BOD (3), TSS (28)					
Telephone:		479-524-6431		Sampler Name(s):		and Signature(s):		TKN(16.A), TP(25), NH3N(15.A), NO3(18)					
FAX:		479-524-8699		ESC Client Number:		2292		Cu (29.HW), (00.MD)					
Sample Identification				Sample Collection				Sample Containers					
Identification	ESC Control #	Date	Time	Type	Matrix	Type	Volume	Preservative	#	Used?	Intact?	Regular	Special
DAF Effluent	ES00020317	9-23-15	14:05	Grab	Water	teflon	100ml	None	1	X		<input checked="" type="checkbox"/>	<input type="checkbox"/>
DAF Effluent		9-23-15	7:00	Comp	Water	plastic	1qt	None, cool < 6°C	1			<input checked="" type="checkbox"/>	<input type="checkbox"/>
DAF Effluent		9-23-15	7:00	Comp	Water	plastic	8 oz	H <sub>2</sub> SO <sub>4</sub> , pH < 2	1			<input checked="" type="checkbox"/>	<input type="checkbox"/>
DAF Effluent				Comp	Water	plastic	8 oz	HNO <sub>3</sub> , pH < 2	1			<input checked="" type="checkbox"/>	<input type="checkbox"/>
DAF Effluent				Grab	Water	glass	1qt	H <sub>2</sub> SO <sub>4</sub> , pH < 2	1			<input checked="" type="checkbox"/>	<input type="checkbox"/>
DAF Effluent				Grab	Water	plastic	8 oz	H <sub>2</sub> SO <sub>4</sub> , pH < 2	1			<input checked="" type="checkbox"/>	<input type="checkbox"/>
DAF Effluent				Grab	Water	plastic	1qt	NaOH	1			<input checked="" type="checkbox"/>	<input type="checkbox"/>
Relinquished By: (Signature and Printed Name)				Received By: (Signature and Printed Name)				Custody Seals:					
Relinquished By: (Signature and Printed Name)				Received By: (Signature and Printed Name)				Turnaround:					
Relinquished By: (Signature and Printed Name)				Received By: (Signature and Printed Name)				Were samples properly preserved:					
Relinquished By: (Signature and Printed Name)				Received By: (Signature and Printed Name)				Debris:					
Comments:				Start Temp: 4.50 C				End Temp: 4.5 C					
FLOW DATA				pH: 14.05				Temp.: 14.05					
DO: 2.5				DO: 2.5				Chlorinated? Yes No					
This Document is Page 1 of 1													

## Anderson, Alan

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**From:** Keogh, Becky  
**Sent:** Friday, October 02, 2015 5:35 AM  
**To:** Bolenbaugh, Jason; Harrelson, Tammy; Carpenter, Ellen  
**Cc:** Shafii, Mo; Healey, Richard; Clem, Sarah; Wentz, Tate; Anderson, Alan; Ungerank, Colby; Bailey, John  
**Subject:** RE: Plant Up Set Siloam Springs Arkansas

Thanks Jason for keeping all up to date with these important progress reports!

Becky W Keogh  
Director

-----Original Message-----

**From:** Bolenbaugh, Jason  
**Sent:** Thursday, October 01, 2015 02:49 PM Central Standard Time  
**To:** Keogh, Becky; Harrelson, Tammy; Carpenter, Ellen  
**Cc:** Shafii, Mo; Healey, Richard; Clem, Sarah; Wentz, Tate; Anderson, Alan; Ungerank, Colby; Bailey, John  
**Subject:** FW: Plant Up Set Siloam Springs Arkansas

Director Keogh,

Below is an email from Thomas Meyers with the City of Siloam Springs that documents the type of discharge Sager Creek had sent to the city's treatment plant. Inspectors Alison West and Matt Holden are going to go back to the treatment plant tomorrow morning. Please let me know if you have any questions.

Thanks,

**Jason Bolenbaugh**  
Inspection Branch Manager  
ADEQ Water Division  
Phone: 501-682-0659  
[bolenbaugh@adeq.state.ar.us](mailto:bolenbaugh@adeq.state.ar.us)

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**From:** West, Alison  
**Sent:** Thursday, October 01, 2015 2:02 PM  
**To:** Bolenbaugh, Jason  
**Subject:** FW: Plant Up Set Siloam Springs Arkansas

---

**From:** Tom Myers [<mailto:tmyers@siloamsprings.com>]  
**Sent:** Thursday, October 01, 2015 1:59 PM  
**To:** Anderson, Alan; Johnson, Miles  
**Cc:** Steven Gorszczyk; West, Alison  
**Subject:** FW: Plant Up Set Siloam Springs Arkansas

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](mailto:tmyers@siloamsprings.com)

---

**From:** Tom Myers  
**Sent:** Wednesday, September 30, 2015 4:27 PM  
**To:** Anderson, Alan ([ANDERSON@adeq.state.ar.us](mailto:ANDERSON@adeq.state.ar.us)); 'JohnsonM@adeq.state.ar.us'  
**Cc:** Steven Gorszczyk; [west@adeq.state.ar.us](mailto: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](mailto:tmyers@siloamsprings.com)



## Anderson, Alan

---

**From:** Tom Myers <tmyers@siloamsprings.com>  
**Sent:** Thursday, October 01, 2015 1:59 PM  
**To:** Anderson, Alan; Johnson, Miles  
**Cc:** Steven Gorszczyk; West, Alison  
**Subject:** FW: Plant Up Set Siloam Springs Arkansas  
**Attachments:** Sager Creek Foods Reports RE Wastewater Plant Upset.pdf

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**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](mailto:west@adeq.state.ar.us)  
**Subject:** Plant Up Set Siloam Springs Arkansas

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Sincerely,

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

## Anderson, Alan

---

**From:** Bolenbaugh, Jason  
**Sent:** Thursday, October 01, 2015 8:56 AM  
**To:** Keogh, Becky; Harrelson, Tammy; Carpenter, Ellen  
**Cc:** West, Alison; Holden, Matthew; Healey, Richard; Anderson, Alan  
**Subject:** RE: Siloam Springs Discharge/Sager Creek

Director Keogh,

I need to clarify a couple of things from my email below. First, the city only has 3 BNRs, not four. They have additional space for a fourth if they ever choose to build the final one. Their records which indicate a fourth caused us to misinterpret that. Second, the city is attempting to get the influent records from Simmons Foods and Sager Creek for review. I earlier indicated they were reviewing the records. Finally, a message from Sager Creek was left last night by Nathan Florer and he indicated they will begin spray irrigating since they cannot pump to the city, and they are currently trying to get their BOD numbers under control. Please let me know if you have any questions.

Thanks,

Jason Bolenbaugh  
Inspection Branch Manager  
ADEQ Water Division  
Phone: 501-682-0659  
[bolenbaugh@adeq.state.ar.us](mailto:bolenbaugh@adeq.state.ar.us)

-----Original Message-----

**From:** Bolenbaugh, Jason  
**Sent:** Wednesday, September 30, 2015 6:32 PM  
**To:** Keogh, Becky; Harrelson, Tammy; Carpenter, Ellen  
**Cc:** West, Alison; Holden, Matthew  
**Subject:** Siloam Springs Discharge/Sager Creek

Director Keogh,

Inspectors Alison West and Matt Holden conducted a second site visit this afternoon at the City of Siloam Springs' WWTP. In speaking with the City, they are still investigating the incident and are reviewing reports from the last weeks of influent they have received from Sager Creek and Simmons Foods. They have been receiving approximately 1 million gallons per day from Sager Creek and 245,000 gallons per day from Simmons Foods. As I explained, from past experience Sager Creek produces approximately 1-1.5 MGD per day during this time of year. Other sources they may be looking at are Gates Rubber (85,000 gallons/day) and Cobb (13,000-15,000 gallons/day). However, Sager Creek and Simmons Foods are being looked at more closely due to the volume of wastewater sent to the WWTP and the BOD loadings received in the wastewater. As of this afternoon no wastewater from Sager Creek was being accepted by the city and non had been accepted since yesterday morning. They are still accepting wastewater from Simmons Foods which may indicate they believe Sager Creek to be the cause. The city is not going to accept any more wastewater from Sager Creek until the plant is back online, but the city is unsure how long that is going to take.

Actions the city has taken to try and correct this issue as soon as possible are as follows: increased aeration and dissolved oxygen; transferred 45,000 gallons of aerobic bugs from the digesters to the BNR process; added 2nd BNR train (have 4) and each train has a capacity to hold 1.5 MGD for longer detention time and acclimate loadings; notified

Sager Creek yesterday to stop discharging; yesterday they diverted influent to the 2.5 million gallon stormwater basin to reduce organic loading to the plant that will aid in recovery; and, they contacted the ADEQ inspectors and Enforcement Branch, and John Steins with AGFC. They were not bypassing to the stormwater pond today because they have already reached capacity. Effluent sampling has been conducted per the permit (24-hr composite) and results are pending.

The discharge was still occurring and the color was similar to the discharge yesterday in that it was gray in color. Dissolved Oxygen levels upstream of the outfall was 9.56 mg/L; effluent at the outfall was 5.20 mg/L; creek sample at the discharge point was 6.33 mg/L; and, downstream at our ARK0005 sample site in Oklahoma was 0.93 mg/L. All of these are similar to yesterday's results.

As we discussed today the city does not have the capability of ceasing discharging. Steve Gorszczyk, Water/Wastewater Manager for the City of Siloam Springs sent the following message to Alison this afternoon, "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."

We do not have a report from the Oklahoma DEQ pertaining to the fish kill (i.e. species and numbers). I have attempted to contact Nathan Florer, Wastewater Manager for Siloam Springs but could only leave a message. Sager Creeks holding pond has a 12.5 million gallon capacity so it will not take them long before it is full and they will have to land apply. They are permitted to land apply so we will monitor those activities as needed. If you have any questions please do not hesitate to ask.

Good job Alison and Matt.

Thank you,

Jason Bolenbaugh  
Inspection Branch Manager  
ADEQ Water Division  
Phone: 501-682-0659  
[bolenbaugh@adeq.state.ar.us](mailto:bolenbaugh@adeq.state.ar.us)

## Anderson, Alan

---

**From:** Bolenbaugh, Jason  
**Sent:** Thursday, October 01, 2015 7:35 AM  
**To:** Healey, Richard; Anderson, Alan  
**Subject:** FW: Siloam Springs Discharge/Sager Creek

Richard and Alan,

I forgot to copy you two on the email I sent the Director regarding ongoing problems at the City of Siloam Springs' WWTP.

Jason Bolenbaugh  
Inspection Branch Manager  
ADEQ Water Division  
Phone: 501-682-0659  
[bolenbaugh@adeq.state.ar.us](mailto:bolenbaugh@adeq.state.ar.us)

-----Original Message-----

**From:** Bolenbaugh, Jason  
**Sent:** Wednesday, September 30, 2015 6:32 PM  
**To:** Keogh, Becky; Harrelson, Tammy; Carpenter, Ellen  
**Cc:** West, Alison; Holden, Matthew  
**Subject:** Siloam Springs Discharge/Sager Creek

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Actions the city has taken to try and correct this issue as soon as possible are as follows: increased aeration and dissolved oxygen; transferred 45,000 gallons of aerobic bugs from the digesters to the BNR process; added 2nd BNR train (have 4) and each train has a capacity to hold 1.5 MGD for longer detention time and acclimate loadings; notified Sager Creek yesterday to stop discharging; yesterday they diverted influent to the 2.5 million gallon stormwater basin to reduce organic loading to the plant that will aid in recovery; and, they contacted the ADEQ inspectors and Enforcement Branch, and John Steins with AGFC. They were not bypassing to the stormwater pond today because they have already reached capacity. Effluent sampling has been conducted per the permit (24-hr composite) and results are pending.

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the discharge point was 6.33 mg/L; and, downstream at our ARK0005 sample site in Oklahoma was 0.93 mg/L. All of these are similar to yesterday's results.

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Good job Alison and Matt.

Thank you,

Jason Bolenbaugh  
Inspection Branch Manager  
ADEQ Water Division  
Phone: 501-682-0659  
[bolenbaugh@adeq.state.ar.us](mailto:bolenbaugh@adeq.state.ar.us)

## Anderson, Alan

---

**From:** Healey, Richard  
**Sent:** Wednesday, September 30, 2015 1:14 PM  
**To:** Anderson, Alan  
**Cc:** Johnson, Miles; McDonald, Scott  
**Subject:** FW: City of Siloam Springs  
**Attachments:** DSCN4839.JPG; DSCN4840.JPG; DSCN4841.JPG; DSCN4842.JPG; DSCN4849.JPG; DSCN4850.JPG; DSCN4853.JPG; DSCN4854.JPG; DSCN4862.JPG; DSCN4868.JPG; DSCN4872.JPG; DSCN4878.JPG

Alan

FYI – Did you receive an email from Mr. Meyer from your conversation yesterday?

Richard C. Healey  
Enforcement Branch Manager  
Water Division  
Arkansas Department of Environmental Quality  
501-682-0640  
[healeyr@adeq.state.ar.us](mailto:healeyr@adeq.state.ar.us)

---

**From:** Carpenter, Ellen  
**Sent:** Wednesday, September 30, 2015 1:00 PM  
**To:** Healey, Richard  
**Cc:** Shafii, Mo  
**Subject:** FW: City of Siloam Springs

FYI.

---

**From:** West, Alison  
**Sent:** Tuesday, September 29, 2015 4:57 PM  
**To:** Bolenbaugh, Jason  
**Subject:** City of Siloam Springs

Jason,

As you are aware, Mr. Myers, City of Siloam Springs, and Mr. Helmer, ODEQ, contacted me today regarding an issue with the plant and fish kill. I have attached some pictures from the Siloam Spring Treatment Plant and ARK0005 for your review. At 14:56 today, the D.O. at Outfall 001 was 5.49 mg/L (duplicate 5.43 mg/L). Temperature 26.6 degrees C. The pH at 15:01 was 7.75 (duplicate 7.77). We collected/analyzed a sample at the bridge. Matt said the sample location was ARK0005. The D.O. was 0.95 mg/L (24.1 degrees C) and pH 7.67 at 15:41. We did observe dead fish (small) at ARK0005. While there, we did see a small catfish gasping for air. Von Helmer was the contact for ODEQ. His number is 918.801.5887. He stated that Oklahoma Department of Wildlife Conservation had observed ~70 meters of the creek and pulled 761 fish. Not sure the type. He provided me with Curtis Tackett, Wildlife Conservation Biologist, contact information. Mr. Tackett's phone number is 405.365.5060. I informed Mr. Myers to contact Allan or Richard, Enforcement, at the initial contact via phone. Mr. Myers stated that he had not made contact with Enforcement while on-site; but, he would do so. I also recommended that he contact the Arkansas Game and Fish. It is my understanding

that they started to see a change at the plant sometime yesterday; but, not sure of the exact time. Mr. Myers stated that someone is not at the plant during the night. We left without getting field data for pH and D.O. from the City. I will request this information tomorrow.

Thanks,

Alison