

October 15, 2012

Laura J. Mushinski, Environmental Quality Director Allen's, Inc. P.O. Box 250 Siloam Springs, Arkansas 72761

RE: AFIN: 04-00175

Permit No.: 4438-WR-4

Dear Ms. Mushinski:

On September 12, 2012, I performed a reconnaissance-level compliance inspection of the Allen's Country Plant in response to a complaint. The complainant contended that two plugs in the wastewater lagoon had come out and that the lagoon was leaking into Gallatin Creek. The complainant also had concerns about the amount of caustic (50% sodium hydroxide) allegedly introduced into the lagoon. This inspection was conducted in accordance with the provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder.

Alison West, District 1 Inspector, and I met with Ira Lane, Plant Manager, Don Whitlock, Wastewater Supervisor, and Jonathan Fuller to discuss the complaint. They were aware that some means of dewatering the lagoon of groundwater had been used during installation of a new liner, but were unsure of how it had operated. Regarding the caustic material, it was explained that several bags of caustic material had become wet, but rather than dumping it into the lagoon all at once, the caustic was introduced into the lagoon at recommended intervals as it is routinely used to adjust the pH in the lagoon.

There were two areas of concern noted during a walk-through of the facility. Liquid from screened vegetable waste had escaped the outdoor concrete pad on which it is staged before being loaded and transported to the animal feed barns and had drained across the gravel drive. Additionally, a sump intended to collect irrigation pump seal water had not been pumped down and the sump pump and high-level alarm were not being maintained. On September 13, 2012, you provided me with a photograph documenting that the vegetable waste had been cleaned up and explained that it had escaped the pad because the pad drains had needed to be cleared. You also provided me with a photograph documenting that the sump had been pumped down and cleaned out. I later learned that this sump had not been in use and will not be part of a new inlet screening process to be implemented in the future.

On October 10, 2012, I received a detailed report which addressed all areas of concern. Most notably, the section regarding the alleged leaks in the lagoon explains the dewatering process utilized during installation of the liner and explains that the PVC pipe used to dewater the lagoon was grouted before wastewater was introduced into the lagoon to prevent any leakage of

Laura Mushinski, Allen's, Inc. October 15, 2012 Page 2

wastewater. Groundwater monitoring wells surrounding the lagoon are sampled on a monthly basis, and the analytical results suggest that no wastewater is leaking from the lagoon.

The Department has determined that your report adequately addresses all areas of concern raised in the complaint and those found during the inspection and appreciates your prompt attention to these matters. No further action is necessary at this time.

If I can be of any assistance, please contact me at 479-267-0811, ext. 16.

Sincerely,

John Fazio District 1 Inspector Water Division

cc: Water Division Enforcement Branch Water Division Permits Branch

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

NO DISCHARGE INDUSTRIAL PERMIT INSPECTION FORM

AFIN	1: <u>04-00175</u>	Log No.: 068256
Perm	it No.: 4438-WR-4	Inspection Date: September 12, 2012
Medi	a: Water	Inspector: John Fazio
	Compliance Status	s: 🗹 IN / 🗆 OUT
1A.	Name of Facility: Allen's Country Plan	it
	County: Benton	prings, Arkansas
2A.	Ira La Don W Name of On-Site Representative: Jonath	ne, Plant Manager; /hitlock, Wastewater Supervisor; an Fuller
3A.	Name of Responsible Official: Laura M	Iushinski, Environmental Quality Director
	Address: Siloam Springs, AR 72761	Telephone: 479-524-9591
4A.	Parent Company: <u>N/A</u>	
	Address:	Telephone:
5A.	Description of Process (including type of in Fruit and vegetable canning products): mixed with hay and fed to c	ndustry, materials produced, and major by- g; wastewater is land applied; waste solids are attle.
6A.	Any complaints registered against this perr If yes, give date and description of compla applied (not valid); 8/28/12: leaking lagoo	mitted facility?
	lagoon, pond has no rence around it and an	
7A.	Are there any additions, modifications, or o inspection?	corrections to the facility since the last □ Yes ☑No
	If yes, explain: However, 3 years ago,	DAF unit taken out-of-service.

1B. Furnish a simplified flow diagram of the treatment system and include main components, flow sequence through plant, and calculated or estimated flows.

Plant floor/trenches \rightarrow gravity flow to parking lot pump station \rightarrow rotary screens \rightarrow screened wastewater to 12.6 million gallon lined lagoon (stationary screen at bottom of lagoon) \rightarrow 200-HP Irrigation Pumps (Vertical Turbine Pumps) \rightarrow irrigation Fields

2B.	Nearest Stream: Gallatin Creek	
3B.	Does wastewater from this facility cause adverse eff	ect on the waters of the State: □ Yes ☑No
	If yes, describe:	
4B.	Are operating records kept as required by permit? If no, explain:	□ Yes □No ☑N/E
5B.	Are maintenance records kept as required by permit? If no, explain:	□ Yes □No ☑N/E
6B.	Are Samples routinely taken?	□ Yes □No ☑N/E
7B.	Does the sampling program meet the requirements of t	he permit?
		\square Yes \square No \blacksquare N/E
	If no, explain:	
8B.	What laboratory does the facility use? N/E	Televis
		Telephone:
1C.	Do laboratory procedures and records meet the require	ements of the permit? $\Box \mathbf{V}_{es} = \Box \mathbf{N}_{o} \mathbf{\nabla} \mathbf{N} / \mathbf{F}$
	If no, explain:	LI TES LINO LIN/E
2C.	Is contaminated runoff a problem?	□ Yes ☑No □N/A
	If yes, explain:	
3C.	Is sludge disposal required?	\blacksquare Yes \square No \square N/A
	If yes, describe (including final destination): Vege	etable cuttings/waste disposed of on

ADEQ Water Industrial No Discharge	AFIN: 04-00175
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Permit #: 4438-WR-4

fields permitted by the state permit and are incorporated into hay for feeding cows.

4C. Is the treatment system being properly operated and maintained as required by permit? \square Yes \square No \square N/A

If no, explain

SUMMARY OF FINDINGS/COMMENTS

The complaint was not valid. A report dated October 10, 2012 was submitted by Allen's and adequately addressed all concerns and allegations. See attached letter to Allen's and Allen's October 10, 2012 report (attached).

Inspector Signature:

Date of Report: 10/12/2012

Signature of Reviewer:

Date of Review: 10/15/2012

ADEQ Water Industrial No Discharge	AFIN: 04-00175	Permit #: 4438-WR-4

Water Division No Discharge Industrial Photographic Evidence Sheet								
Location: Allen's Country Plant								
Photographe	grapher: John Fazio			Witness:	Alison West			
Photo #	1	Of	4		Date:	09/12/12	Time:	1133
Description:		High d	ensity po	lyethylene heat-fused line	d lagoon.		•	
Photographe	r:	John F	azio		Witness:	Alison West		
Photo #	2	Of	4		Date:	09/12/12	Time:	1146
Description:		Monito	oring well	between lagoon and Gall	atin Creek.		I	

ADEQ Water Industrial No Discharge	AFIN: 04-00175	Permit #: 4438-WR-4

		Wat	er Divisi	on No Discharge	Industr	ial Photogr	aphic Eviden	ce Sheet	
Location: Allen's Country Plant									
Photographer: John Fazio					Witness:	Alison Wes	t		
Photo #	3	Of	4			Date:	09/12/12	Time:	1154
Description:		Out-of- followi	use irriga ng day.	tion pump seal sump	p. Floats a	and high-leve	el alarm not main	ntained. Clea	aned out the
Photographer	::	John F	azio			Witness:	Alison Wes	t	
Photo #	4	Of	4			Date:	09/12/12	Time:	1156
Description:		Carrot cleaned	waste and l up imme	wastewater that had diately.	l escaped	the staging pa	ad. Drains clear	ed immediate	ely and area



October 10, 2012

Mr. John Fazio District 1 Inspector, Water Division Arkansas Department of Environmental Quality FAZIO@adeq.state.ar.us

RE: Allens, Inc. – Plant #1 Information Related to August 28, 2012 Complaint

Dear Mr. Fazio:

Allens, Inc. (Allens) understands that a former employee lodged a complaint with the Arkansas Department of Environmental Quality (ADEQ) regarding wastewater issues at the company facility in Siloam Springs (Plant#1 or the Country Plant). An inspection was conducted in response to the concerns raised by Mr. John Fazio and Ms. Alison West, on behalf of ADEQ, on September 12, 2012. Additional information about the nature of the concerns raised was provided by Mr. Fazio in an email dated September 21, 2012 and in subsequent telephone calls with Allens staff, both Ms. Laura Mushinski and Dr. Neelakandan Sathiyakumar (Sathi). The purpose of this letter and attachments is to provide the requested information about the concerns raised with the complaint and the inspection. Each area of concern is discussed separately below.

Sump

During the inspection, ADEQ staff questioned why a sump had not been pumped down and why it was not covered. This sump is intended to collect the irrigation pump seal water and return it to the wastewater system. However, these irrigation pumps were not currently in use at the time of the inspection since it was necessary to bring in an alternative pump because of issues with plugging the inlet screen on the irrigation pumps. As Sathi indicated when he spoke to Mr. Fazio, Allens is completing plans for a different type of inlet screening system that will address the concerns that we have had with the irrigation pumps. Since the sump (and the irrigation pumps related to it) had not been in use, the sump pump and high level alarm were not being maintained. Nonetheless, the sump was cleaned out, pumped down, and temporary cover has been placed over this sump. (See the following photos.) This sump will not be part of the new inlet screening system.



Vegetable Waste Drainage

Also during the inspection, the ADEQ noted some liquid from the screened vegetable waste had escaped the concrete pad and gotten into the gravel drive. Allens believes this occurred because a drain (back to the wastewater system) on the concrete pad had become plugged. The drain has been cleared and the area has been cleaned up as shown in the following photo. Staff was reminded of the importance to contain all drainage from vegetable waste.



Sodium Hydroxide

The complaint alleged that 7,500 pounds of caustic material was put into the wastewater pond. It is important to note that sodium hydroxide is a normal and routine component of the wastewater

at Country Plant. Caustic (or 50% sodium hydroxide) is used for peeling root crops such as carrots and potatoes. The peel waste, with the spent caustic, is part of the wastewater stream. Additionally, many of the sanitation chemicals used to clean the plant equipment contain sodium hydroxide as an active ingredient. Sodium hydroxide is also used to pretreat boiler feed water and boiler boil-down is also a normal constituent of the wastewater.

Although a great deal of information is not provided by the complaint, Allens believes it may be alluding to a time when bags of caustic that were added to the lagoon because some 50-pound sacks had gotten wet and were not useable in the plant. The total weight was about 1,000 pounds, it was added over the course of several days, and the caustic was readily and completely neutralized in the 12.6-million gallon lagoon. There is no negative impact to adding caustic to the lagoon for the lagoon itself or the irrigation system. Indeed the permit requires soil monitoring for land application sites for pH and liming, if necessary, to maintain soil pH levels above 5.7 standard units.

Typically the wastewater in the lagoon is on the acidic side due to the biological processes that occur in the wastewater pond (please see the table below). Periodically, Allens staff add caustic (sodium hydroxide) to the pond to neutralize the wastewater. Allens has hired Environmental Services Company to collect and analyze wastewater from the pond, prior to irrigation, on a monthly basis. (This is far more often that the annual sample required by the wastewater permit.) As the following data shows, wastewater pH has not been above 7.0 standard units. Any caustic additions have been consistently and completely neutralized.

Samula Data	pH Level				
Sample Date	(by ESC)				
1/31/2011	5.0				
2/28/2011	4.8				
3/31/2011	4.6				
4/29/2011	4.3				
5/26/2011	4.8				
6/21/2011	5.0				
7/19/2011	5.3				
8/23/2011	6.0				
9/27/2011	5.8				
10/18/2011	5.2				
11/29/2011	4.0				
12/20/2011	4.8				
1/24/2012	4.4				
2/21/2012	4.2				
3/30/2012	4.5				
4/27/2012	4.6				
5/29/2012	5.1				
6/19/2012	5.0				
7/27/2012	6.0				
8/29/2012	5.8				
Samples have continued to be					
collected on a monthly basis but					
reports are not complete yet.					

Plugs & Lagoon Leakage

The complaint stated that the wastewater pond is leaking into the creek and that two "plugs" came out and "nothing has been done to fix the problem."

The current wastewater lagoon at the Country Plant was installed in 1997 (or thereabouts) and is approximately 12.6-million gallons in capacity. The lagoon has concrete floor and sides. When it was originally constructed, a spray-on 40 mil polyurea SS-100 coating was used to protect the concrete from the wastewater. The concrete lagoon had expansion/contraction joints sealed with a 2-part polysulfide Sanneborn joint sealant. The concrete lagoon was also constructed with an 18-inch concrete waterstop. The original plans are attached. Although there are no environmental or engineering employees with firsthand knowledge of the original construction, it is Allens understanding that the concrete lagoon was constructed to be water-tight and that the coating was protecting the concrete.

In approximately 2008, it appeared that some of the spray-on coating had begun to delaminate, and in a proactive measure to protect the integrity of concrete lagoon from wastewater corrosion, Allens began a project to empty the lagoon, land apply lagoon sediments, and re-line the concrete with a high density polyethylene heat-fused liner. Allens hired USI Consulting Engineers from Springdale to design and engineer the liner replacement. Allens worked with ADEQ to get the necessary permits for land application of the lagoon sediment and this was completed in 2008. The lagoon was completely emptied, cleaned, and the new liner was placed on top of the concrete and existing polyurea coating. Hydrostatic pressure from groundwater – a particular concern when the concrete lagoon was empty – was relieved with a large diameter casing well that was constructed on the northwest side of the lagoon during the project. USI was in contact with Mr. Bob Singleton, ADEQ, about discharge of the groundwater from the dewatering activities during the 2008 lagoon project.

In response to the complaint, Allens contacted USI for input about the nature of construction of the pressure relief valves. USI has reiterated the need for hydrostatic relief, but did not provide a great deal of detail on their design, construction, or how they were attached. In fact, the valves do not appear on USI's drawings (copy attached). As best as USI can recollect, they believe the pressure relief valves were installed by the lining contractor.

USI stated the following related to the "plug" and "relief valves" via an email to Neel Sathi on October 3, 2012:

"Sathi, here is a detail of the air relief flap for the liner. It was to release any gas or air that may get between the HDPE liner and the concrete liner. There were no pressure relief valves installed with the liner. The things that became detached are de-watering ports utilized by the liner installing contractor to facilitate installation of the liner. These were necessary to lower the surrounding ground water table to prevent it from pushing the concrete out and into the lagoon. The existing plans of record did indicate that there were pressure relief valves installed. But, I don't think they were. That's why the liner contractor installed the PVC pipes for dewatering. This is stated in my letter to Laura, dated December 17, 2007. The Type of PRV that was specified was constructed of cast iron. Our experience has been that these do not perform well

due to corrosion. PRV's are necessary, though, to prevent the heaving of the liners due to hydrostatic pressure caused by the surrounding ground water. The flap is found on page 25 of the attachment".

Based on the above correspondence with USI, there is a clear misunderstanding of relief valve and relief flap among the wastewater employees. So, what surfaced in the wastewater lagoon is 2-inch white PVC pipe with a cap that was installed by the liner contractor for groundwater dewatering purposes during the liner installation. Also, USI informed us verbally that the PVC pipe is grouted in the bottom.

Upon learning that one of the plugs dislodged a few months ago, Allens environmental staff reviewed the groundwater monitoring data from around the wastewater lagoon to see if there were any disturbing trends. Although the current permit no longer requires it, Allens has continued to monitor the groundwater around the wastewater lagoon with three groundwater monitoring wells that are sampled and analyzed monthly. Two of these monitoring wells are located on the outside berm of the lagoon on the side nearest the stream, so Allens would anticipate minimal elapsed time between any lagoon leakage concerns and evidence in the monitoring wells. Allens believes the most indicative parameter of potential lagoon leakage to be chloride since it is not treated in the lagoon system and the wastewater has a fairly high concentration of chloride from the salt used in canning. A graph on chloride concentrations in the monitoring wells versus the wastewater concentrations is provided below.



During the most recent months of July, August, and September, the ranges in concentrations for all three of groundwater monitoring wells were as follows:

- Biochemical Oxygen Demand (BOD) <2 to 6 mg/l
- Total Dissolved Solids (TDS) 198 to 383 mg/l

In contrast, typical wastewater concentrations range from 500 to 4500 mg/l for BOD and 900 to 3500 mg/l for TDS. If you would like all the groundwater monitoring data, please let us know and we will provide it.

Based on the on-going groundwater monitoring results, Allens does not believe there is an immediate and significant concern about lagoon leakage. Because of the concerns raised in the alleged complaint, it is now recognized that there must have been much speculation amongst hourly staff about the potential source of the PVC pipes with caps found in the lagoon, and in contrast, the results of the groundwater monitoring were not really discussed with all employees. In any event, Allens plans on again emptying the lagoon with the new inlet screening project and inspecting the liner to confirm this and will make any corrective measures if necessary.

The following items were specifically requested in Mr. Fazio's email on September 21, 2012 and during the site visit at the feed barn on October 10, 2012. A brief explanation and/or clarification is provided for each.

- Up-to-date schematics for the wastewater treatment and disposal system.
 - *A schematic is attached for your review.*
- Detailed schematics for: the pond; the liner; the pipes used to control groundwater.
 - A copy of the 1997 plans by Atkins Engineering and the 2008 plans by USI are attached. These plans show the pond and liner. There are no pipes used to control groundwater.
- Any repair/modification for the liner.
 - There have not been any repairs or modifications for the lagoon liner since the project was completed in 2008 and the 2008 plans have been included.
- An explanation of how the pipes used to control groundwater at the pond function. • There are no pipes in use which function to control groundwater.
- How/why caustic is used for the wastewater pond.
 - *An explanation about the use of caustic is provided in that section of this letter, titled* <u>Sodium Hydroxide</u>.
- Monitoring well analysis.
 - A summary of groundwater monitoring data is provided in this letter. If requested by ADEQ, Allens can provide a copy of all the groundwater monitoring reports.

Allens hopes that we have provided all the requested information and that this adequately addresses the concerns raised in the complaint. If ADEQ has any questions or requires additional information, please contact Dr. Sathiyakumar or Ms. Mushinski at (479) 220-2311 or (479) 228-0102, respectively. Thank you for your time and consideration with the correspondence and the telephone calls regarding these issues.

Sincerely,

Allens, Inc.

Laura J. Mushinski, CHMM

Director - Environmental Quality

cc: Ira Lane, Allens - Country

ann

Neelakandan Sathiyakumar, PhD, PE Vice President

Allens, Inc. | PO Box 250 | 305 E. Main Street | Siloam Springs, AR 72761



Country Plant – Wastewater Schematic



PLANS FOR CONSTRUCTION OF

WASTEWATER IRRIGATION FACILITIES

ALLEN CANNING COMPANY

COUNTRY PLANT



SILOAM SPRINGS, ARKANSAS

JULY 1997



OWNER ALLEN CANNING COMPANY 300 R. MAN STREET STAM FRENKS, AR 17141 (801) 334431

ENGINEER ATRINS ENGINERRING COMPANY 1111 III STRUT-PO.802440 BARLOR, ARKENSA 57913 (501) 444-0133

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- 2. IRRIGATION SITE A
- 3. IRRIGATION SITE B
- 4. LAGOON SITE PLAN
- 5. LAGOON DETAILS
- 6. IRRIGATION PUMP STATION











COUNTRY PLANT WASTEWATER IMPROVEMENTS LAGOON SYSTEM IMPROVEMENTS

FOR ALLENS, INC.

USI Project No. 0709034.02 Dated: April, 2008

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