



March 17, 2014

Steve Alexander, Owner  
Steve Alexander Farm  
Alexander Farm II  
879 Goat Ranch Rd.  
Umpire, AR 71971

**Re: Compliance Inspections (Howard Co)**  
**AFIN: 31-00111 State Permit No.: 4289-WR-3**  
**31-00103 4188-WR-3**

Dear Mr. Alexander:

On March 11, 2014, I performed a routine compliance inspection of your facilities in accordance with the provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder. This inspection revealed the following violations:

**4289-WR-3**

1. A discharge of liquid manure originating from the cleanout was observed on the ground between the barn and the holding pond. This discharge flowed into a nearby freshwater pond located on the property (see Photos 1 – 4). This discharge was not reported as required in Part III, 13. Evidence of an additional older overflow was discovered near the southern-most barn. This was also not reported as required.
2. Only one soil analyses report was made available. The annual report indicates all land application fields were utilized. Soil samples for all fields land applied on, which are required every five (5) years from the effective date of the permit, should be made available. Also, the land application fields should be reported separately on the annual report.

**4188-WR-3**

1. The CNMP states, "Livestock shall be prevented from entering the settling basin and holding pond areas. If fencing is not adequate, fencing should be installed." No fencing was in place around the holding pond. The CNMP also states, "it is required that you install a marking or gauge post to clearly show liquid depth in the holding pond." Currently, there are two staff gauges in the holding pond.

Both indicate different freeboard depths. One should be removed and the other verified for accuracy.

2. Only one soil analyses report was made available. The annual report indicates all land application fields were utilized. Soil samples for all fields land applied on, which are required every five (5) years from the effective date of the permit, should be made available. Also, the land application fields should be reported separately on the annual report.

Please be advised, a household trash dump was observed on the farm. A previous inspection recommended that this trash be removed and disposed of properly. This matter will be referred to the ADEQ Solid Waste Division. Implementing good housekeeping procedures is recommended.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Inspection Branch, of this Department. This response should be mailed to the address at the bottom of the first page or e-mailed to [Water-Inspection-report@adeq.state.ar.us](mailto:Water-Inspection-report@adeq.state.ar.us). This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentations (i.e. photos) is due by **March 31, 2014**.

If I can be of any assistance, please feel free to contact me at (501) 837-2078.

Sincerely,



Shan Lynch  
District 7 Field Inspector  
Water Division

cc: Richard Gray, Cargill Pork Group

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**Agricultural Permit Inspection Report**

<b>Inspection Date</b> 3-11-2014	<b>AFIN Number</b> 31-00111	<b>Permit Number</b> 4289-WR-3	<b>County</b> Howard	<b>Compliance Status</b> <b>OUT</b>
<b>Facility Name and Location</b> Steve Alexander Farm  Hwy 246 north of Athens then east on Goat Ranch Rd. 2.25 miles		<b>Name of Responsible Official</b> Steve Alexander  <b>Phone Number</b> 870 583-7221		<b>Mailing Address</b> 879 Goat Ranch Rd.  Umpire, AR 71971
<b>Legal Description</b> Sec. <u>11</u> Tns. <u>5S</u> Rng. <u>28W</u>		<b>Name of Person Contacted</b> Derek Alexander / 870 557-7220		<b>Title</b> son of owner
<b>Grow or Produce for:</b> Cargill		<b>Design Animal Type and Capacity</b>		
<b>Evaluate the Following Areas: S-Satisfactory M-Marginal U--Unsatisfactory N/A-Not Evaluated</b>				
<b>Part 1 - Operation and Maintenance</b>				
<b>(a) No discharge of wastewater from basins, lagoons, holding pond, and/or pits.</b>				<b>U</b>
(b) No leaks or seeps in waste holding/disposal system.				<b>S</b>
(c) Adequate freeboard was found at basins, lagoons, holding ponds, and/or pits.				<b>S</b>
Estimate freeboard:				22"
(d) Banks and levees properly maintained and in good operating condition.				<b>S</b>
(e) Adequate holding capacity in waste holding system.				<b>S</b>
(f) Adequate waste disposal equipment available and operational. Type: ( <u>Sprinkler irrigation &amp; honey wagon</u> )				<b>S</b>
(g) All waste being properly applied according to permit and waste management plan.				<b>S</b>
(h) All land application sites are approved under waste management plan or site management plan.				<b>S</b>
(i) Waste holding pond/pit is properly fenced, posted, and staff gauge installed if required.				<b>S</b>
(j) Waste facility and confinement area constructed according to approved plans.				<b>N</b>
(k) Owner and managing operators have completed adequate training and/or education.				<b>N</b>
(l) All flush systems, drain chutes, and waste drag systems operational.				<b>S</b>
(m) Facility operating within design type and capacity limits.				<b>S</b>
Comments/Violations Noted in Operation and Maintenance Section				
1(a) – A discharge of liquid manure originating from the cleanout was observed on the ground between the barn and the holding pond. This discharge flowed into a nearby freshwater pond. This discharge was not reported as required in Part III, 13. Evidence of an additional older overflow was discovered near the southern-most barn. This was also not reported as required.				
<b>Part 2 - Sampling</b>				
(a) Waste/wastewater sampled and analyzed for parameters as required by the permit and/or Reg. 5.				<b>S</b>
(b) Soil at the land application sites sampled and analyzed as required by the permit and/or Reg 5.				<b>N</b>
(c) Sampling and analytical methods meet the terms and conditions of the permit and/or Reg 5.				<b>N</b>

### Part 3 - Records and Reports

(a) Adequate records are kept on all waste being land disposed as required by permit and/or Reg. 5.	S
(b) Records being maintained on all sampling and analysis of soil and waste as required by permit and/or Reg. 5.	M
(c) Annual reports and other record keeping requirements kept and/or submitted as required by permit and/or Reg. 5	M

Comments/Violations noted Records and Reports Section

3(b)(c) – Only one soil analyses report was made available. The annual report indicates all land application fields were utilized. Soil samples for all fields land applied on, which are required every 5 years from the effective date of the permit, should be made available.

### Part 4 - General

(a) All waste streams at the facility are covered under permit.	S
(b) No waste placed in a location where it is likely to cause pollution to the waters of the State.	M
<b>(c) No visible effects on nearby waters of the State due to permitted waste system.</b>	M
<b>(d) Dead animals properly disposed.</b>	S

☐ Composter ☐ On-site Burial ☐ Renderer ☒ Incinerator ☐ Other (Specify \_\_\_\_\_)

Comments/Violations noted in General Section

4(b) & (c) – See Part 1(a).

### Part 5 - Recurring/Highlighted Violations

(List all Recurring and/or Highlighted Violations of Permit Conditions)

See Part 1(a).

PDS# 076581

Photos Take During  
Inspection:

yes

Samples Taken:

no

Inspector Name:

*Shan Lynch*

Shan Lynch

Date of Report

March 13, 2014



Signature of Reviewer:

*Kerri McCabe*



Kerri McCabe

Date of Review

March 17, 2014

Water Division NPDES Photographic Evidence Sheet									
<b>Location:</b>		Steve Alexander Farm							
<b>Photographer:</b>		Shan Lynch				<b>Witness:</b>		Steve Alexander Farm personnel	
<b>Photo #</b>	1	<b>Of</b>	4		<b>Date:</b>	3-11-2014	<b>Time:</b>	10:54	
<b>Description:</b>		Origin of discharge (yellow arrow). Liquid manure shown (red arrow).							
		 <p>A photograph showing a muddy, brownish-grey area, likely a discharge point. A green pipe is visible in the foreground, and a red arrow points to a pool of liquid manure. A yellow arrow points to the origin of the discharge. The date and time stamp '03.11.2014 10:54' are visible in the bottom right corner.</p>							
<b>Photographer:</b>		Shan Lynch				<b>Witness:</b>		Steve Alexander Farm personnel	
<b>Photo #</b>	2	<b>Of</b>	4		<b>Date:</b>	3-11-2014	<b>Time:</b>	10:54	
<b>Description:</b>		Origin of discharge (yellow arrow). Discharged hog manure (red arrow) with flow toward pump (orange arrow). Liquid manure flowed behind holding pond shown at right.							
		 <p>A photograph showing a wider view of the discharge area. A green pipe is visible in the foreground, and a red arrow points to a pool of liquid manure. A yellow arrow points to the origin of the discharge. An orange arrow points to a pump. The date and time stamp '03.11.2014 10:54' are visible in the bottom right corner.</p>							

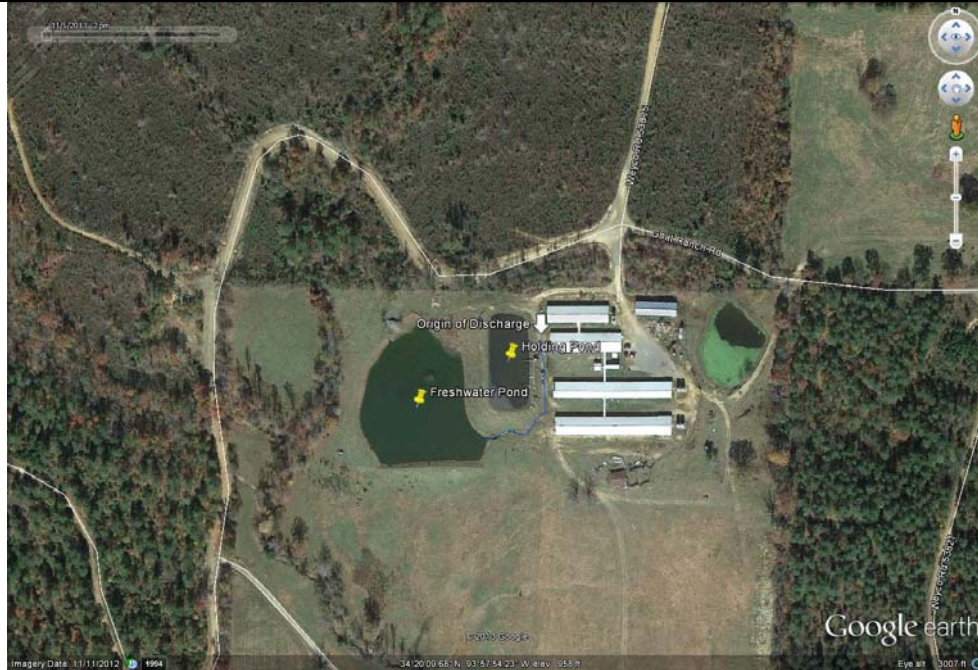


Water Division NPDES Photographic Evidence Sheet									
<b>Location:</b>		Steve Alexander Farm							
<b>Photographer:</b>		Shan Lynch				<b>Witness:</b>		Steve Alexander Farm personnel	
<b>Photo #</b>	3	<b>Of</b>	4		<b>Date:</b>	3-11-2014	<b>Time:</b>	10:51	
<b>Description:</b>		Photo taken near pump shown in previous photo. Note evidence of runoff into freshwater pond.							
									
<b>Photographer:</b>		Shan Lynch				<b>Witness:</b>		Steve Alexander Farm personnel	
<b>Photo #</b>	4	<b>Of</b>	4		<b>Date:</b>	3-11-2014	<b>Time:</b>	10:52	
<b>Description:</b>		Same as previous.							
									



## Water Division NPDES Photographic Evidence Sheet

<b>Location:</b>	Steve Alexander Farm					
<b>Photographer:</b>	Shan Lynch			<b>Witness:</b>	N/A	
<b>Photo #</b>		<b>Of</b>		<b>Date:</b>		<b>Time:</b>
<b>Description:</b>	Overview of Steve Alexander Farm and observed discharge from holding pond into the privately-owned pond located on the property.					



<b>Photographer:</b>	Shan Lynch			<b>Witness:</b>	N/A	
<b>Photo #</b>		<b>Of</b>		<b>Date:</b>		<b>Time:</b>
<b>Description:</b>	Closer view of previous slide.					



To: ADEQ Water Division Inspector Branch

3-27-14

From: Steve Alexander owner of Alexander Farm II #4289-WR-3  
and Steve Alexander Farms #4188-WR-3

On March 11<sup>th</sup> as soon as Mr. Lynch left, my son Derek came down to the house and told me about the situation on the farm. I was down with a ruptured disc in my back. I told him how to start work on the problem as Mr. Lynch had instructed.

1<sup>st</sup> We took a gasoline pump and pumped off all the liquid we could.

2<sup>nd</sup> We took the backhoe and tractor and ~~scraped~~ scraped all the solids back into the holding pond.

3<sup>rd</sup> We took a tractor tiller and tilled the dirt.

4<sup>th</sup> We then covered the tilled soil with new dirt and gravel.

After we fixed the spill we started on the fence. We built a fence around that farm's pond first and removed the old staff gauge. We then went to Alexander Farm II and built a new fence and removed the old staff gauge on that farm.

To fix the soil sample record problem I have sent off ~~the~~ new soil sample on each field we pumped over the last 2 years. I will



use these sample on this years report to help  
correct that problem.

The trash dump has been ~~burned~~ burned  
and plan on filling it over with dirt. I  
used it hoping to fill it up and cover it

~~because it holds water-year round is created~~  
a problem with snakes and mosquitoes.

I am sorry about the problems and have  
~~always~~ tried to do what was right on the  
farm.

Thanks

Steve Alexander

Steve Alexander  
879 Hoot Ranch Rd  
Umpire, AR 71971

LITTLE ROCK AR 722

28 MAR 2014 PM 4 1



ADEQ

5301 Northshore Drive  
North Little Rock, AR

72118-5317

To: Water Division Inspection Branch

72118531799





April 9, 2014

Steve Alexander, Owner  
Steve Alexander Farm  
Alexander Farm II  
879 Goat Ranch Rd.  
Umpire, AR 71971

**Re: Response to Inspections (Howard Co)**  
**AFIN: 31-00111**  
**31-00103**

**State Permit No.: 4289-WR-3**  
**4188-WR-3**

Dear Mr. Alexander:

I have reviewed the response pertaining to my March 11, 2014 inspections of both Steve Alexander Farms. The information provided sufficiently addresses the violations referenced in my inspection reports. At this time, the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (501) 837-2078 or you may e-mail me at [lynch@adeq.state.ar.us](mailto:lynch@adeq.state.ar.us).

Sincerely,

A handwritten signature in cursive script that reads "Shan Lynch".

Shan Lynch  
District 7 Field Inspector  
Water Division