

ADEQ

ARKANSAS
Department of Environmental Quality

May 9, 2019

Richard McCormac, Mayor
City of Clinton
P.O. Box 277
Clinton, AR 72301

RE: Natural State Processing - Industrial User Inspection (Van Buren Co)
AFIN: 71-00018 **NPDES Permit No.: AR0048836**

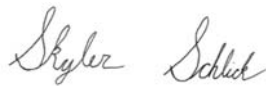
Dear Mayor McCormac:

On March 26, 2019, 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. A copy of the inspection report is enclosed for your records.


Please refer to the “Summary of Findings” section of the attached inspection report and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to 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 documentation (i.e., photos) is due by **May 23, 2019**.

If I can be of any assistance, please contact me at schlicks@adeq.state.ar.us or (870) 424-3322 extension 2.

Sincerely,



Skyler Schlick
District 2 Field Inspector
Office of Water Quality


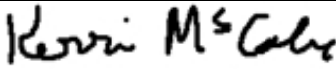
 A R K A N S A S Department of Environmental Quality	WATER DIVISION INSPECTION REPORT		
	AFIN: 71-00018	PERMIT #: AR0048836	DATE: 3/26/2019
	COUNTY: 71 Van Buren	PDS #: 107741	MEDIA: WN
	GPS LAT: 35.568136 LONG: -92.459064 LOCATION: General Area		
FACILITY INFORMATION		INSPECTION INFORMATION	
NAME: Natural State Processing LOCATION: 245 Quality Drive CITY: Clinton		FACILITY TYPE: 2 - Industrial INSPECTOR ID#: 117208 S - State FACILITY EVALUATION RATING: N INSPECTION TYPE: Industrial User	
RESPONSIBLE OFFICIAL		DATE(S): 3/26/2019 ENTRY TIME: 09:30 EXIT TIME: 10:39 PERMIT EFFECTIVE DATE: 12/1/2010 PERMIT EXPIRATION DATE: 12/30/2015	
NAME / TITLE: Richard McCormac / Mayor COMPANY: City of Clinton MAILING ADDRESS: P.O. Box 277 CITY, STATE, ZIP: Clinton AR 72301 PHONE & EXT. / FAX: 501-745-4320 / EMAIL: clintonmayor@artelco.com		FAYETTEVILLE SHALE RELATED: N FAYETTEVILLE SHALE VIOLATIONS: N	
CONTACTED DURING INSPECTION: No		INSPECTION PARTICIPANTS	
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Phil Graham (Lic# 008981)/ Operator/ 501-253-1365/ clintonfire25@yahoo.com William Hinchey (Lic# 010850) / Water and Sewer Manager/ (501) 745-4320	
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	
M OTHER: Industrial User			
SUMMARY OF FINDINGS			
<p>The City of Clinton has boilerplate pretreatment language in the individual NPDES permit (see Part II, Condition 7 and Part III, Sec D, 8 of the permit). It is the city's responsibility to identify any indirect discharger (i.e., Industrial User) to the city's collection system and wastewater treatment plant and require them to comply with the requirements outlined in the individual NPDES permit.</p> <p>As required to demonstrate compliance with Part II, Condition 7, A, 3 and 4 and under direction of Part II, 7, B of the permit, Natural State Processing must conduct an influent sample of the discharge. This influent sample must be after the catch basin and during a processing event to be representative of the volume and nature of the discharge to the city's collection system. The sampling will include analyses for Total Suspended Solids (TSS), Oil and Grease (O&G), Biochemical Oxygen Demand (BOD5), Chemical Oxygen Demand (COD), and Ammonia Nitrogen (NH3-N). Sampling must comply with requirements outlined in 40 CFR 136. Natural State Processing must supply the results of the analyses to the City of Clinton to report to ADEQ. Based on information obtained from sample results, the IU may be required to implement additional preliminary and primary treatments prior to the city's collection system.</p>			

GENERAL COMMENTS

On March 26, 2019, an inspection was conducted with the above-mentioned inspection participants. The inspection consisted of a site assessment.

Natural State Processing is leasing part of the building at 345 Quality Drive in Clinton, AR from Global Performance Group, Inc. The Operations Manager for Natural State Processing, Andy Shaw, was not onsite at the time of the inspection, but he was spoken to via telephone while onsite. Mr. Shaw stated that Natural State Processing processed 91,000 chickens last year and they are a little over that pace for this year. Chickens are processed two days a week onsite. There is a bleed tunnel and a catch basin where process water and rendering are collected. Premium Protein Products, LLC picks up 35-gal drums of the chicken renderings. Some of the organs are packaged and sold. A copy of the City of Clinton's pretreatment ordinance was left onsite for Andy Shaw.

There was a large amount on chicken feathers and grease/fat found in the city's collection system discharged by Natural State Processing. Best Management Practices (BMPs) need to be implemented to prevent feathers, offal, and other sources of pollutants that may contributor to interference within the city's collection system and wastewater treatment plant. The city is pumping out the Industrial Park lift station once a month because of issues generated by Natural State Processing.

INSPECTOR'S SIGNATURE:  Skyler Schlick	DATE: 4/4/2019
SUPERVISOR'S SIGNATURE: 	Kerri McCabe DATE: 4/5/2019

Inspection Report: **Natural State Processing**, AFIN: **71-00018**, Permit #: **AR0048836**
Industrial User Site Visit

Name of Industry: Natural State Processing

Industry Contacts: Andy Shaw, Operations Manager

Type of Industry: Poultry Processor

Date of Visit: March 26, 2019

- | | | | | |
|-----|---|---|--|---|
| 1. | Significant industrial user: | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" 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 checked="" type="checkbox"/> No | <input 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 type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 8. | Appropriate self-monitoring
procedures/equipment? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 9. | Adequate spill prevention? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |
| 10. | Industry familiar with limits
and requirements? | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input checked="" type="checkbox"/> N/A |

Additional Comments: The operator said there were management practices in place; however, if there are a significant amount of chicken feathers being introduced into the collection system, the management practices are not being implemented properly.

Visit Conducted By: Skyler Schlick, William Hinchey, Phil Graham

Date of Report: April 4, 2019

Water Division Photographic Evidence Sheet

Location:	Natural State Processing				
Photographer:	Skyler Schlick	Date:	September 10, 2018	Time:	1308
Witness:	N/A			Photo #:	1
Description:	Industrial Park lift station with close-up of feathers observed in wet well.				



Photographer:	Skyler Schlick	Date:	September 10, 2018	Time:	1320
Witness:	N/A			Photo #:	2
Description:	Industrial Park lift station with close-up of feathers observed in wet well.				



Water Division Photographic Evidence Sheet

Location:	Natural State Processing		
Photographer:	Skyler Schlick	Date:	September 10, 2018
Witness:	N/A	Time:	1321
		Photo #:	3
Description:	Industrial Park lift station with close-up of feathers observed in wet well.		



Photographer:	Skyler Schlick	Date:	September 10, 2018
Witness:	N/A	Time:	1319
		Photo #:	4
Description:	Manhole across Quality Dr. from Natural State Processing with close-up of feathers.		



Figure 1. Google Earth image depicting location of photos from areas of the collection system.



From: [Beck, Amy](#)
To: [McConnell, Melissa](#)
Subject: FW: LETTER RE: INDUSTRIAL PARK LIFT STATION
Date: Monday, March 9, 2020 3:58:02 PM
Attachments: [LETTER re INDUSTRIAL PARK LIFT STATION.pdf](#)

Please attach to PDS 107741 and 110385.

-AB

From: CLINTON WATER DEPT. [mailto:clintonwater2@gmail.com]
Sent: Monday, March 9, 2020 1:42 PM
To: Beck, Amy
Subject: LETTER RE: INDUSTRIAL PARK LIFT STATION

Ms. Beck,

Attached is the letter that needed to be submitted by March 9th.

Donna

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Donna George

Clinton Water & Sewer Dept.

P.O. Box 277

Clinton, AR 72031

501-745-4320

| | Virus-free. www.avast.com

TY OF CLINTON
CLINTON WATER AND SEWER DEPARTMENT
P.O. BOX 277
CLINTON, AR 72031
TELEPHONE (501) 745-4320
FAX (501) 745-2164

Jackie W. Hinchey, Manager

Richard McCormac, Mayor

March 3, 2020

Amy Beck, Field Inspector
ADEQ
5301 Northshore Dr.
North Little Rock, AR 72118-5317

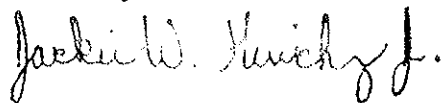
RE: Industrial Park Lift Station – Failure to Respond Inspection (Van Buren Co.)
AFIN: 71-00018 NPDES Permit No.: AR0048836

Dear Ms. Beck:

The City of Clinton and Natural State Processing are in negotiations. If the negotiations fail; then Natural State Processing will move to another location. If they stay; then a pre-treatment facility for their waste will be implemented.

Should you have any questions, feel free to contact me at (501) 745-4320.

Sincerely,



Jackie W. Hinchey, Manager
Clinton Water and Sewer Dept.



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

March 16, 2020

Richard McCormac, Mayor
City of Clinton
P.O. Box 277
Clinton, AR 72301

RE: Industrial Park Lift Station - Response to Inspections (Van Buren Co)
AFIN: 71-00018 **NPDES Permit No.: AR0048836**

Dear Mayor McCormac:

I have reviewed the response pertaining to the May 9, 2019 and December 16, 2019 inspections conducted by District 2 Inspector Skyler Schlick of the Industrial Park Lift Station. The information provided sufficiently addresses the violations referenced in the inspection reports. At this time, the Department has no further comment concerning these particular inspections. 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 (479) 968-7339 ext. 16 or you may e-mail me at beck@adeq.state.ar.us.

Sincerely,

A handwritten signature in cursive script that reads "Amy Beck".

Amy Beck
District 5 Inspector
Office of Water Quality