

From: [Gilliam, Allen](#)
To: [Burrow, Kealey](#)
Subject: AR0020273_Siloam Springs Cease and Desist Order with Sager Creek Foods_20151013
Date: Tuesday, October 13, 2015 9:49:01 AM
Attachments: [Signed Cease and Desist Order.pdf](#)

E/NPDES/NPDES/Pretreatment/Reports

From: Steven Gorszcyk [<mailto:sgorszcyk@siloamsprings.com>]
Sent: Wednesday, October 07, 2015 5:58 PM
To: Healey, Richard
Cc: Tom Myers; parthy.evans@stinson.com; Don Clark
Subject: Cease and Desist Order - Sager Creek Foods

Richard,

Thanks again for taking time out to be in attendance for the conference call this morning.

Please find attached the above referenced Order to Sager Creek Foods. City staff met with the industry representatives this afternoon and presented the Order.

Please contact me with any questions.

Thanks,

Steve Gorszcyk

Water/Wastewater Manager

City of Siloam Springs

479-238-0935 Office

479-228-4888 Cell

sgorszcyk@siloamsprings.com



CITY OF SILOAM SPRINGS, ARKANSAS

In the Matter of:)	
)	CEASE AND DESIST ORDER
Sager Creek Foods, Inc.)	
14961 Readings Road)	
Siloam Springs, AR 72761)	OCTOBER 7, 2015
)	
Proceedings under Siloam Springs)	
City Code Section 98-764)	

AUTHORITY

This Cease and Desist Order is issued under the authority vested in the City of Siloam Springs City Administrator pursuant to Siloam Springs City Code Section 98-764.

FINDINGS OF FACT

The City Administrator finds that Sager Creek Foods, Inc. ("Sager Creek Foods") is in violation of Pretreatment Permit No. 009, issued April 10, 2015 to Sager Creek Foods and in violation of Siloam Springs City Code Chapter 98, Article V, Industrial Pretreatment. These findings are based on the following facts:

1. Pursuant to Authorization to Discharge Wastewater Under the National Pollutant Discharge Elimination System and the Arkansas Water and Air Pollution Control Act, Permit Number AR0020273, issued to the City of Siloam Springs ("City") effective September 24, 2007 ("NPDES Permit"), the City is required to establish, implement, and enforce an industrial pretreatment program.
2. The City's Industrial Pretreatment Program was approved by Arkansas Department of Environmental Quality on August 22, 1984 and subsequently modified and approved on March 3, 2000 and on November 30, 2012. The City's Industrial Pretreatment Ordinance is set forth at City Code Chapter 98, Article V.
3. The City's Pretreatment Program implements Section 307(b) of the Federal Clean Water Act, 33, U.S.C. § 1317(b) and National Pretreatment Program requirements set forth at 40 C.F.R. Part 403.
4. Sager Creek Foods owns and operates a vegetable processing and canning plant at 14961 Readings Road, Siloam Springs, Arkansas, classified by SIC No. 2032, 2033, NAICS 311421, 311422. Sager Creek Foods is a non-domestic wastewater source in Benton County, Arkansas. Sager Creek Foods introduces pollutants within the meaning of Section 502(6) of the Federal Clean Water Act, 33 U.S.C. section 1362(6) and City Code 98-479, into the Siloam Springs sewer collection system for treatment in the Siloam Springs Wastewater Treatment Plant, which is a POTW within the meaning of Section 307(b), 33 U.S.C. section 1317(b), and National Pretreatment Program regulations at 40 C.F.R. Part 403. Sager Creek Foods is a "User" as defined in City Code 98-479.

5. On April 10, 2015, the City issued Wastewater Discharge Permit No. 009, to Sager Creek Foods authorizing the discharge of pretreated wastewater from Sager Creek Foods to the City of Siloam Springs sewer collection system and City POTW (Pretreatment Permit).
 - (a) The Pretreatment Permit sets forth numerical discharge limitations, best management practices, monitoring and recordkeeping, and notification and reporting requirements, all as required to implement the City's Pretreatment Program and the National Pretreatment Program.
 - (b) The Pretreatment Permit, Part II. Section A, requires that the permittee, Sager Creek Foods, comply with all permit conditions and applicable provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, City Code Article 98, Article V, and all orders, rules, and regulations issued pursuant to those laws.
6. The Pretreatment Permit, Part I. Section A – Discharge Limitations sets forth the following discharge limitations for discharges from Sager Creek Foods to the City POTW:

Pollutant	Daily Maximum (mg/l)	Maximum Monthly Average (mg/l)
Oil and Grease	100 mg/l	100 mg/l
pH	Between 6 – 9	N/A
Total Suspended Solids	900 mg/l	305 mg/l
BOD	900 mg/l	375 mg/l
COD	Report Only mg/l	Report Only mg/l
Maximum Discharge	1,500,000 MGD	1,500,000 MGD
Phosphorus (T)	15 mg/l	10 mg/l
Ammonia (NH ₃ -N)	20 mg/l	10 mg/l
Nitrate-Nitrogen (NO ₃)	10 mg/l	7 mg/l
Cyanide	Report only mg/l	Report only mg/l
Zinc	Report only mg/l	Report only mg/l
Copper	1.4 lbs/day	1.1660 lbs/day
Mercury	Report Only mg/l	Report Only mg/l
TKN	50 mg/l	45 mg/l

7. The Pretreatment Permit Part II. Section A, Paragraph 1 sets forth the permittee's duty to comply as follows:

The permittee must comply with all conditions of this permit and all applicable provisions of the Federal Clean Water Act, 33 U.S.C. sections 1251 et seq., the Arkansas Water and Air Pollution Control Act, Ark. State. Ann. sections 82-1901 et seq., City Ordinance No. 1084, and all orders, rules, and regulations issued pursuant to those laws. Any permit noncompliance constitutes a violation of the Federal Clean Water Act and the Arkansas Water and Air Pollution Control Act

and is grounds for enforcement action, for permit termination, revocation and re-issuance, or modification, or for denial of a permit renewal application.

8. The purpose and policy of the City's Industrial Pretreatment Code is to prevent the introduction of pollutants into the City POTW that will pass through or otherwise be incompatible with the wastewater treatment works. City Code 98-746.
9. The National Pretreatment Regulations at 40 C.F.R. 403.5(a)(1) prohibit an industrial user from introducing into a POTW any pollutant(s) which cause pass through or interference.
10. City Code 98-479 and the National Pretreatment Regulations at 40 C.F.R. section 403.3(p) define pass through as:

A discharge which exits the POTW into waters of the state in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirements of the POTW's NPDES permit, including an increase in the magnitude or duration of a violation.

11. City Code 98-479 and the National Pretreatment Regulations at 40 C.F.R. section 403.3(k) define interference as:

A discharge, which alone or in conjunction with a discharge or discharges from other sources, inhibits or disrupts the POTW, its treatment processes or operations or its sludge processes, use or disposal; and therefore, is a cause of a violation of the city's NPDES permit.

12. The Pretreatment Permit, Part II. Section D, Paragraph 6 requires twenty-four hour reporting as follows:

The permittee shall report any noncompliance which may endanger health or adversely affect the wastewater treatment facility. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. The City may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.

The following shall be included as information which must be reported within 24 hours:

- (a) Any unanticipated bypass which exceeds any effluent limitation in the permit;

- (b) Any upset which exceeds any effluent limitation in the permit;
 - (c) Violation of a maximum daily discharge limitation for any of the pollutants listed by the City in Part I of the permit; and
 - (d) Any act or event which may endanger public health or adversely affect the wastewater treatment facility.
13. The Pretreatment Permit, Part II. Section D, Paragraph 1 requires notification of planned changes as follows:

Any change in the facility discharge (including the introduction of any new source of discharge or changes in the quantity or quality of discharges of pollutants) must be reported to the permitting authority. In no case are any new connections, increased flows, or significant changes permitted that will cause violation of the discharge limitations specified herein.

City Code 98-621 requires 60 days' notification to the City of planned significant changes to operations or systems which might alter the nature, quality, or volume of its wastewater discharge.

14. The Pretreatment Permit, Part II. Section D, Paragraph 2 requires advance notice of anticipated noncompliance as follows:

The permittee shall give advance notice to the City of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Such notice does not constitute any defense in any enforcement action.

15. The Pretreatment Permit, Part II. Section B, paragraph 5 and City Code 98-622 require notification of slug loading as follows:

In accordance with 40 CFR, Section 403.12(f), permittee shall notify the POTW (Phone No. 524-5623) immediately of any slug loading of any pollutant, including oxygen demanding pollutants (BOD, etc.) released to the POTW system at a flow rate and/or pollutant concentration which has the potential to cause interference with the POTW.

16. The Pretreatment Permit, Part II. Section B, Paragraph 3 requires mitigation of discharges as follows:

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health, the environment or the wastewater treatment plant. Adverse effects on the wastewater treatment plant include:

- (a) Biological upset of the plant;

- (b) Pollutant loadings to the plant causing pass through to the receiving stream;
 - (c) Pollutant loadings which interfere with normal sludge disposal; or
 - (d) Any discharge which directly or indirectly causes the plant to violate its NPDES permit.
17. On September 20, 2015 the City POTW operators noted odor at the POTW headworks. The operators checked all POTW operational parameters and confirmed the operations to be within parameters.
18. On September 23, 2015 the City POTW operators noted that the Biological Nutrient Removal (“BNR”) basin 3 experienced a change in color and responded by increasing aeration of the basin. Operators checked POTW operating parameters and confirmed operations to be within parameters. In accordance with the City’s discharge permit requirements, the City initiated collection of a composite sample at 10:00 am on September 23, 2015.
19. On September 24, 2015, the BNR basin 3 water resumed proper coloration. BNR basin coloration remained proper through September 27, 2015.
20. On September 28, 2015:
- (a) BNR basin 3 water changed color to black and effluent from the POTW was milky in color;
 - (b) The City POTW operators declared BNR basin 3 to be in upset and notified the Arkansas Department of Environmental Quality of upset;
 - (c) The City POTW operators diverted POTW influent flow to the POTW storm water basin to mitigate damage to the BNR basin and mitigate impact on effluent quality;
 - (d) The City POTW operators began operation of a second treatment train utilizing BNR basin 1 at the POTW to provide additional treatment and to mitigate the impact of upset of the BNR basin 3;
 - (e) The City POTW operators began investigation of the cause of the upset of BNR Basin 3;
 - (f) The City POTW operators' investigation included a phone call to Sager Creek Foods during which call the City was informed that Sager Creek Foods was discharging high levels of Biological Oxygen Demand (“BOD”).
21. On September 29, 2015, under authority of City Code 98-765 Emergency Suspensions, the City requested that Sager Creek Foods cease all discharges to the

City POTW. Sager Creek Foods complied with the emergency suspension request.

- 22. On September 29, 2015, the Oklahoma Fish and Game Commission contacted the City Wastewater Superintendent to inform him of a fish kill in Sager Creek, the POTW effluent receiving stream.
- 23. On September 29, 2015 representatives of the Arkansas Department of Environmental Quality (“ADEQ”) began investigation of the upset and fish kill.

FINDINGS OF VIOLATIONS

- 24. Sager Creek Foods violated Pretreatment Permit, Part I. Section A – Discharge Limitations as follows:

Discharge Date	BOD daily max limit 900 mg/l	BOD monthly ave limit 375 mg/l
9-22-15	1,790.0	
9-23-15	1746.0	
9-24-15	1,913.0	
September		668

Analytical laboratory reports provided by Sager Creek Foods documenting the above discharges are in Exhibit A.

- 25. Sager Creek Foods failed to report the above discharges pursuant to Pretreatment Permit, Part II. Section D, Paragraph 6 requiring twenty-four hour reporting of any noncompliance which may endanger health or adversely affect the wastewater treatment facility thus violating the Pretreatment Permit.
- 26. Sager Creek Foods failed to notify the City of planned changes as required by Pretreatment Permit, Part II. Section D, Paragraph 1 thus violating the Pretreatment Permit and failed to notify the City of any planned changes in operations or the discharger’s system which might alter the nature, quality, or volume of wastewater discharge as required by City Code 98-621 thus violating the City Code 98-621.
- 27. Sager Creek Foods failed to notify the City of potential problems pursuant to City Code 98-622 which requires that a discharger immediately telephone and notify the City of any discharge, including, but not limited to accidental discharges, discharges of a nonroutine, episodic nature, a noncustomary batch discharge, or a slug load, that may cause potential problems for the POTW, thus violating City Code 98-622.
- 28. Sager Creek Foods failed to notify the City of slug loading pursuant to Pretreatment Permit, Part II. Section B, paragraph 5 thus violating the Pretreatment Permit and City Code 98-622.

29. Sager Creek Foods failed to take mitigating measures in response to the discharges documented above in violation of the duty to mitigate mandated by Pretreatment Permit Part II. Section B, paragraph 3, thus violating the Pretreatment Permit.

ORDER

30. Sager Creek Foods is ordered to cease all discharges into the City's POTW except as provided in this Cease and Desist Order and the Pretreatment Permit.
31. The discharge requirements in this Cease and Desist Order supersede discharge requirements of the Pretreatment Permit Part I, Section A for maximum discharge flow and discharge limitations for BOD to the extent that this Cease and Desist Order imposes alternative requirements. All other provisions of the Pretreatment Permit remain in full force and effect.
32. Discharge from Sager Creek Foods to the City POTW is prohibited until 1:00 pm October 8, 2015.
33. Beginning 1:00 pm October 8, 2015 and until October 30, 2015, Sager Creek Foods may discharge pretreated wastewater to the City POTW as follows:

- (a) Discharge limits:

<u>Parameter</u>	<u>Maximum Discharge</u>
Flow	750,000 gallons per day
BOD	1125 mg/l

- (b) Monitoring requirements for discharges authorized above:

Flow shall be monitored with a magnetic flow meter and recorded daily. BOD shall be monitored daily with 24 hour time composite flow proportional sampling representative of the discharges authorized above. Monitoring procedures of the Pretreatment Permit shall be implemented.

- (c) Monitoring requirement for Chemical Oxygen Demand ("COD"). On each 24 hour time composite flow proportional sample collected pursuant to paragraph 33(b) above, Sager Creek Foods shall within 12 hours after sample collection perform a COD analysis and shall report the COD analysis to the Siloam Springs Wastewater Superintendent by telephone at 479-228-0934 and email tmyers@siloamsprings.com within the 12 hour period.

- (d) Monitoring data shall be reported to the City as follows:

- (i) Sager Creek Foods shall send an email to the Siloam Springs Wastewater Superintendent at tmyers@siloamsprings.com by 9:00am each day with the flow data for the preceding day.

- (ii) Sager Creek Foods shall request that its contract laboratory provide a verbal report of the data to the Siloam Springs Wastewater Superintendent at 479-228-0934 as soon as analytical information becomes available. If the Wastewater Superintendent does not answer the telephone, the contract laboratory shall leave a message indicating that analyses are available and shall send an email to the Wastewater Superintendent at tmyers@siloamsprings.com providing the analytical information.
 - (iii) Sager Creek Foods shall request that its contract laboratory directly email all analytical reports of Sager Creek Foods wastewater analysis directly to the Wastewater Superintendent at tmyers@siloamsprings.com.
 - (iv) In addition, all reporting requirements of the Pretreatment Permit shall be followed.
34. If at any time Sager Creek Foods violates the terms of this Cease and Desist Order or the Pretreatment Permit the City will issue an Emergency Suspension of discharge pursuant to City Code 98-765.
35. No later than 5:00 pm on October 30, 2015 Sager Creek Foods shall demonstrate compliance with the Pretreatment Permit BOD daily maximum limit of 900 mg/l and all other requirements of the Pretreatment Permit and City Code Chapter 98, Article V. If Sager Creek Foods does not make such demonstration, the City will issue an order terminating the discharge from Sager Creek Foods to the City collection system and POTW.

RESERVATION OF ASSESSMENT OF
ADMINISTRATIVE PENALTY
AND COSTS

36. Administrative penalties, costs for responding to the unauthorized discharges and Pretreatment Permit violations, and costs for preparing this Cease and Desist Order and subsequent orders will be assessed in an Administrative Penalty Order that will be issued separately from this Cease and Desist Order.

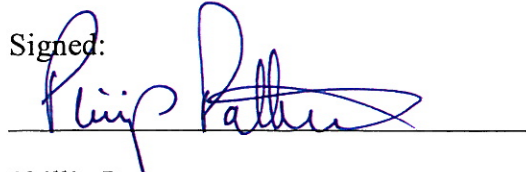
EFFECT OF ORDER

37. This Order is not and shall not be interpreted to be a pretreatment permit or in any way extinguish, waive, satisfy, or otherwise affect the obligation of Sager Creek Foods to comply with the Federal Clean Water Act, the Arkansas Water and Air

Pollution Control Act, the City Code Industrial Pretreatment Program, or the Pretreatment Permit.

38. This Order takes effect upon signature.

Signed:



Phillip Patterson,
City Administrator
City of Siloam Springs, Arkansas

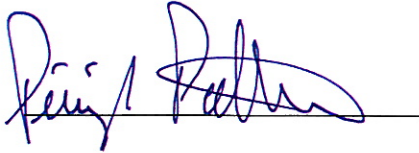
Dated:

October 7, 2015

CERTIFICATE OF SERVICE

I CERTIFY that this Cease and Desist Order was personally served on Mike of Sager
Creek Foods, Inc. on October 7, 2015. Zelkud

Signed:

A handwritten signature in blue ink, appearing to read "Phillip Patterson", written over a horizontal line.

Phillip Patterson
City Administrator
City of Siloam Springs, Arkansas

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: 1508020477
 Customer Name : SAGER CREEK VEG. CO. -WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/11/15

Composite Date: 08/30/15 -08/31/15
 Sample Time : 0700-0700
 Sample Type : COMP
 Sample From : DAF EFFLUENT

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

Laboratory Analysis

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
08/31	1400 KIK	BOD, 5-day	36.0 mg/L			SM 2001 5210 B	1.20	98.0 *
09/02	1100 RHB	Ammonia Nitrogen	0.1 mg/L			SM 1997 4500-NH3 F	8.70	113.0 *
09/11	0815 TSB	Kjeldahl Nitrogen Total	8.90 mg/L			SM 1997 4500-NorgB	1.86	99.4 *
09/08	1100 TSB	Nitrate Nitrogen	0.47 mg/L			SM 2000 4500-NO3 E	1.50	96.0 *
09/02	1400 RHB	Phosphorous, Total (as P)	0.5 mg/L			EPA 365.3	4.88	108.8 *
09/04	0900 KIK	Solids, Total Suspended	34.0 mg/L			SM 1997 2540 D	11.76	N/A

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

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 Broom
 Environmental Services Co., Inc.

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: 1509020004 Composite Date: 08/31/15 -09/01/15 Collected By: CH
 Customer Name: SAGER CREEK VEG.CO.-WW-DAF EFF. Sample Time: 0700-0700 Delivery By: RHB
 Customer Number: 2292 Sample Type: COMP Work Order:
 Report Date: 09/11/15 Sample From: DAF EFFLUENT Purchase Order:

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/02	0800	KIK	BOD, 5-day	31.5 mg/L			SM 2001 5210 B	0.09	95.1 *
09/02	1100	RHB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	8.70	113.0 *
09/11	0815	TSB	Kjeldahl Nitrogen Total	12.30 mg/L			SM 1997 4500-NorgB	1.86	99.4 *
09/08	1100	TSB	Nitrate Nitrogen	0.39 mg/L			SM 2000 4500-NO3 F	1.50	96.0 *
09/08	0900	TSB	Phosphorous, Total (as P)	0.4 mg/L			EPA 365.3	2.06	105.8 *
09/04	0900	KIK	Solids, Total Suspended	22.0 mg/L			SM 1997 2540 D	11.76	N/A *

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Signature Richard Brown
 Environmental Services Co., Inc.

Environmental Services Company, Inc.

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 Little Rock, AR 72211
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 Springdale, AR 72762
 Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1509020058
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/10/15

Sample Date : 09/01/15
 Sample Time : 0700
 Sample Type : GRAB
 Sample From : DAF EFFLUENT

Collected By: CH
 Delivery By : RHB
 Work Order :
 Purchase Order :

Laboratory Analysis

Date <u>Time</u> By	Parameter	Result	Notes	Quantity	Method
09/10 0530 RHB	Chemical Oxygen Demand	134.0 mg/L			11/2014 HACH 8000

Quality Assurance	Precision	Accuracy
% RPD	0.83	% Recovery
		100.1 *

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Signature Richard Brown
 Environmental Services Co., Inc.

Environmental Services Company, Inc.

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

Control Number: 1509020017
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/11/15
 Composite Date: 09/01/15 -09/02/15
 Sample Time : 0700-0900
 Sample Type : COMP
 Sample From : DAF EFFLUENT
 Collected By: WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis		Result		Notes	Quantity	Method	Precision & RPD	Quality Assurance Accuracy & Recovery
Date	Time By	Parameter	Result	Notes	Quantity	Method		
09/04	0800 KIK	BOD, 5-day	28.0 mg/L			SM 2001 5210 B	5.00	94.4 *
09/04	1022 RHB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	0.00	102.2 *
09/11	0815 TSB	Kjeldahl Nitrogen Total	11.20 mg/L			SM 1997 4500-NorgB	1.86	99.4 *
09/08	1100 TSB	Nitrate Nitrogen	0.40 mg/L			SM 2000 4500-NO3 E	1.50	96.0 *
09/08	0900 TSB	Phosphorous, Total (as P)	0.4 mg/L			EPA 365.3	2.06	105.8 *
09/08	1235 KIK	Solids, Total Suspended	38.0 mg/L			SM 1997 2540 D	4.65	N/A *

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Signature Richard Baum
 Environmental Services Co., Inc.

Environmental Services Company, Inc.

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 Little Rock, AR 72211
 Tel. (501)221-2565 Fax (501)221-1341

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


Control Number: 1509020087
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/24/15
 Composite Date: 09/08/15 -09/09/15
 Sample Time : 0700-0700
 Sample Type : COMP/GRAB
 Sample From : DAF EFFLUENT
 Collected By: CH/WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Date	Time	BY	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/09	0800	KIK	BOD, 5-day	226.0 mg/L			SM 2001 5210 B	7.26	99.9 *
09/15	0930	NTR	Metals Digestion	1			1994 EPA 200.8	0.00	100.0
09/11	1315	TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.52	101.3 *
09/15	0800	TSB	Kjeldahl Nitrogen Total	7.80 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500	TSB	Nitrate Nitrogen	0.31 mg/L			SM 2000 4500-NO3 E	0.47	103.1
09/16	0830	TSB	Oil & Grease, Total	5.1 mg/L			EPA 1664 Rev B	2.36	98.0 *
09/09	1225	WDS	pH	7.7 S.U.			SM 2000 4500-H+ B	0.00	N/A *
09/10	1600	TSB	Phosphorous, Total (as P)	0.5 mg/L			EPA 365.3	0.00	101.1 *
09/11	0950	KIK	Solids, Total Suspended	36.0 mg/L			SM 1997 2540 D	0.00	N/A *
09/22	1204	RAH	Copper	< 0.0030 mg/L			EPA 200.8	4.43	107.1

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Signature 
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Control Number: 1509020087
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/24/15
 Composite Date: 09/08/15 - 09/09/15
 Sample Time : 0700-0700
 Sample Type : COMP/GRAB
 Sample From : DAF EFFLUENT
 Collected By: CH/WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis		Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/09	0800 KIK	226.0 mg/L		1	SM 2001 5210 B	7.26	99.9 *
09/15	0930 NTR				1994 EPA.200.8	0.00	100.0
09/11	1315 TSB	< 0.1 mg/L			SM 1997 4500-NH3 F	2.52	101.3 *
09/15	0800 TSB	7.80 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500 TSB	0.31 mg/L			SM 2000 4500-NO3 E	0.47	103.1
09/16	0830 TSB	5.1 mg/L			EPA 1664 Rev B	2.36	98.0 *
09/09	1225 WDS	7.7 S.U.			SM 2000 4500-H+ B	0.00	N/A *
09/10	1600 TSB	0.5 mg/L			EPA 365.3	0.00	101.1 *
09/11	0950 KIK	36.0 mg/L			SM 1997 2540 D	0.00	N/A *
09/22	1204 RAH	< 0.0030 mg/L			EPA 200.8	4.43	107.1
	Copper						

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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: 1509020163
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/10/15
 Sample Date : 09/09/15
 Sample Time : 1225
 Sample Type : GRAB
 Sample From : DAF EFFLUENT
 Collected By: CH/WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

<u>Date</u> 09/10 0530 RHB	<u>Time By</u> 0530 RHB	<u>Parameter</u> Chemical Oxygen Demand	<u>Result</u> 320.0 mg/L	<u>Notes</u>	<u>Quantity</u>	<u>Method</u> 11/2014 HACH 8000	
			<u>Precision</u> % RPD				<u>Quality Assurance</u> Accuracy
			0.83				% Recovery 100.1 *

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Control Number: 1509020163
 Customer Name: SAGER CREEK VEG.CO. -WW-DAF EFF.
 Customer Number: 2292
 Report Date: 09/10/15


Sample Date: 09/09/15
 Sample Time: 1225
 Sample Type: GRAB
 Sample From: DAF EFFLUENT

Collected By: CH/WDS
 Delivery By: WDS
 Work Order:
 Purchase Order:

Laboratory Analysis			
Analysis Date	Time	BY	Method
09/10	0530	RHB	11/2014 HACH 8000
Parameter		Result	Notes
Chemical Oxygen Demand		320.0 mg/L	
Precision % RPD		0.83	
Accuracy % Recovery		100.1 *	

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

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 1107 Century Avenue
 Springdale, AR 72762
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Control Number: 1509020097 Composite Date: 09/09/15 -09/10/05 Collected By: CH
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF. Sample Time : 0700-0700 Delivery By : KIK
 Customer Number : 2292 Sample Type : COMP Work Order :
 Report Date : 09/17/15 Sample From : DAF EFFLUENT Purchase Order :

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/11	0800	KIK	BOD, 5-day	193.2 mg/L			SM 2001 5210 B	2.43	101.1 *
09/11	1315	TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	3.75	101.3 *
09/15	0800	TSB	Kjeldahl Nitrogen Total	10.10 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500	TSB	Nitrate Nitrogen	0.40 mg/L			SM 2000 4500-NO3 E	0.47	103.1 *
09/11	1100	TSB	Phosphorous, Total (as P)	0.3 mg/L			EPA 365.3	2.25	102.7 *
09/15	1110	KIK	Solids, Total Suspended	28.0 mg/L			SM 1997 2540 D	40.00	N/A *

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 Little Rock, AR 72211
 Tel. (501)221-2565 Fax (501)221-1341

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 Springdale, AR 72762
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Control Number: 1509020097 Composite Date: 09/09/15 -09/10/05 Collected By: CH
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF. Sample Time : 0700-0700 Delivery By : KIK
 Customer Number : 2292 Sample Type : COMP Work Order :
 Report Date : 09/17/15 Sample From : DAF EFFLUENT Purchase Order :

Laboratory Analysis

Analysis		Quality Assurance	
Date	Time By	Precision % RPD	Accuracy % Recovery
09/11	0800 KIK	2.43	101.1 *
09/11	1315 TSB	3.75	101.3 *
09/15	0800 TSB	1.16	99.7 *
09/14	1500 TSB	0.47	103.1 *
09/11	1100 TSB	2.25	102.7 *
09/15	1110 KIK	40.00	N/A *

Parameter	Result	Notes	Quantity	Method
BOD, 5-day	193.2 mg/L			SM 2001 5210 B
Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F
Kjeldahl Nitrogen Total	10.10 mg/L			SM 1997 4500-NorgB
Nitrate Nitrogen	0.40 mg/L			SM 2000 4500-NO3 E
Phosphorous, Total (as P)	0.3 mg/L			EPA 365.3
Solids, Total Suspended	28.0 mg/L			SM 1997 2540 D

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Signature Richard B. Bamm
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Environmental Services Company, Inc.

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 13715 West Markham
 Little Rock, AR 72211
 Tel. (501)221-2565 Fax (501)221-1341


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 1107 Century Avenue
 Springdale, AR 72762
 Tel. (479)750-1170 Fax (479)750-1172

Control Number: 1509020111 Composite Date: 09/10/15 -09/11/15 Collected By: WDS
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF. Sample Time : 0700-0700 Delivery By : WDS
 Customer Number : 2292 Sample Type : COMP Work Order :
 Report Date : 09/18/15 Sample From : DAF EFFLUENT Purchase Order :

Analysis		Laboratory Analysis			Quality Assurance																																					
Date	Time By	Parameter	Result	Notes	Quantity	Method																																				
09/11	0800 KIK	BOD, 5-day	4.7 mg/L			SM 2001 5210 B																																				
09/15	1130 TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F																																				
09/15	0800 TSB	Kjeldahl Nitrogen Total	10.10 mg/L			SM 1997 4500-NorgB																																				
09/14	1500 TSB	Nitrate Nitrogen	0.28 mg/L			SM 2000 4500-NO3 E																																				
09/15	1510 TSB	Phosphorous, Total (as P)	0.2 mg/L			EPA 365.3																																				
09/17	1030 KIK	Solids, Total Suspended	14.0 mg/L			SM 1997 2540 D																																				
<table border="0" style="width: 100%;"> <tr> <td style="width: 30%;">Precision</td> <td style="width: 10%;">2.43</td> <td style="width: 30%;">Accuracy</td> <td style="width: 10%;">101.1 *</td> <td style="width: 10%;"></td> <td style="width: 10%;"></td> </tr> <tr> <td>% RPD</td> <td>2.25</td> <td>% Recovery</td> <td>98.4 *</td> <td></td> <td></td> </tr> <tr> <td></td> <td>1.16</td> <td></td> <td>99.7 *</td> <td></td> <td></td> </tr> <tr> <td></td> <td>0.47</td> <td></td> <td>103.1 *</td> <td></td> <td></td> </tr> <tr> <td></td> <td>0.00</td> <td></td> <td>100.0 *</td> <td></td> <td></td> </tr> <tr> <td></td> <td>0.00</td> <td></td> <td>N/A *</td> <td></td> <td></td> </tr> </table>							Precision	2.43	Accuracy	101.1 *			% RPD	2.25	% Recovery	98.4 *				1.16		99.7 *				0.47		103.1 *				0.00		100.0 *				0.00		N/A *		
Precision	2.43	Accuracy	101.1 *																																							
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	0.00		N/A *																																							

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

Control Number: 1509020111
 Customer Name: SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number: 2292
 Report Date: 09/18/15
 Composite Date: 09/10/15 -09/11/15
 Sample Time: 0700-0700
 Sample Type: COMP
 Sample From: DAF EFFLUENT
 Collected By: WDS
 Delivery By: WDS
 Work Order:
 Purchase Order:

Laboratory Analysis

Date	Time	By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/11	0800	KIK	BOD, 5-day	4.7 mg/L			SM 2001 5210 B	2.43	101.1 *
09/15	1130	TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.25	98.4 *
09/15	0800	TSB	Kjeldahl Nitrogen Total	10.10 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500	TSB	Nitrate Nitrogen	0.28 mg/L			SM 2000 4500-NO3 E	0.47	103.1 *
09/15	1510	TSB	Phosphorous, Total (as P)	0.2 mg/L			EPA 365.3	0.00	100.0 *
09/17	1030	KIK	Solids, Total Suspended	14.0 mg/L			SM 1997 2540 D	0.00	N/A *

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Control Number: 1509020111
 Customer Name : SAGER CREEK VEG.CO. -NW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/18/15
 Composite Date: 09/10/15 -09/11/15
 Sample Time : 0700-0700
 Sample Type : COMP
 Sample From : DAF EFFLUENT
 Collected By: WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis		Result		Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
09/11	0800 KIK	BOD, 5-day	4.7 mg/L			SM 2001 5210 B	2.43	101.1 *
09/15	1130 TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.25	98.4 *
09/15	0800 TSB	Kjeldahl Nitrogen Total	10.10 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500 TSB	Nitrate Nitrogen	0.28 mg/L			SM 2000 4500-NO3 B	0.47	103.1 *
09/15	1510 TSB	Phosphorous, Total (as P)	0.2 mg/L			EPA 365.3	0.00	100.0 *
09/17	1030 KIK	Solids, Total Suspended	14.0 mg/L			SM 1997 2540 D	0.00	N/A *

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

Control Number: 1509020197
 Customer Name : SAGER CREEK VEG.CO.-LAGOON
 Customer Number : 1381
 Report Date : 09/18/15
 Sample Date : 09/11/15
 Sample Time : 0905
 Sample Type : GRAB
 Sample From : LAGOON
 Collected By: WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis		Result		Notes		Quantity		Method		Quality Assurance	
Date	Time By	Parameter	Result	Notes	Quantity	Method	% RPD	Accuracy	% Recovery		
09/18	0845 TSB	Alkalinity (as CaCO3)	300.00 mg/L			SM 1997 2320 B	3.64		0.0 *		
09/11	0800 KIK	BOD, 5-day	219.0 mg/L			SM 2001 5210 B	2.43		101.1 *		
09/15	1330 RHB	Chemical Oxygen Demand	1484.0 mg/L			11/2014 HACH 8000	0.63		93.3 *		
09/11	0905 WDS	Dissolved Oxygen	0.2 mg/L			SM 2001 4500-O G	0.00		N/A		
09/15	0800 TSB	Kjeldahl Nitrogen Total	67.20 mg/L			SM 1997 4500-NorgB	1.16		99.7 *		
09/11	0905 WDS	pH	7.3 S.U.			SM 2000 4500-H+ B	0.00		N/A *		
09/17	1030 KIK	Solids, Total Suspended	920.0 mg/L			SM 1997 2540 D	0.00		N/A *		
09/14	1500 TSB	Nitrate + Nitrite	0.7 mg/L			SM 2000 4500-NO3 E	0.00		103.1 *		
09/11	0800 KIK	Soluble BOD	74.4 mg/L			SM 2001 5210 B	11.54		101.1 *		

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Control Number: I509020197
 Customer Name: SAGER CREEK VEG.CO.-LAGOON
 Customer Number: 1381
 Report Date: 09/18/15
 Sample Date: 09/11/15
 Sample Time: 0905
 Sample Type: GRAB
 Sample From: LAGOON
 Collected By: WDS
 Delivery By: WDS
 Work Order:
 Purchase Order:

Laboratory Analysis

Analysis		Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/18	0845 TSB	300.00 mg/L			SM 1997 2320 B	3.64	0.0 *
09/11	0800 KIK	219.0 mg/L			SM 2001 5210 B	2.43	101.1 *
09/15	1330 RHB	1484.0 mg/L			11/2014 HACH 8000	0.63	93.3 *
09/11	0905 WDS	0.2 mg/L			SM 2001 4500-O G	0.00	N/A
09/15	0800 TSB	67.20 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/11	0905 WDS	7.3 S.U.			SM 2000 4500-H+ B	0.00	N/A *
09/17	1030 KIK	920.0 mg/L			SM 1997 2540 D	0.00	N/A *
09/14	1500 TSB	0.7 mg/L			SM 2000 4500-NO3 B	0.00	103.1 *
09/11	0800 KIK	74.4 mg/L			SM 2001 5210 B	11.54	101.1 *

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Control Number: 1509020200
 Customer Name: SAGER CREEK VEG. CO. -WW-DAF EFF.
 Customer Number: 2292
 Report Date: 09/21/15
 Composite Date: 09/13/15 -09/14/15
 Sample Time: 0700-0745
 Sample Type: COMP/GRAB
 Sample From: DAF EFFLUENT
 Collected By: NF
 Delivery By: WDS
 Work Order:
 Purchase Order:

Laboratory Analysis

Analysis		Laboratory Analysis		Quality Assurance				
Date	Time BY	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery
09/14	1000 KIK	BOD, 5-day	295.0 mg/L			SM 2001 5210 B	3.33	94.4 *
09/15	1130 TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.25	98.4 *
09/15	0800 TSB	Kjeldahl Nitrogen Total	4.50 mg/L			SM 1997 4500-NorgB	1.16	99.7 *
09/14	1500 TSB	Nitrate Nitrogen	0.32 mg/L			SM 2000 4500-NO3 E	0.47	103.1 *
09/14	1210 WDS	pH	7.6 S.U.			SM 2000 4500-H+ B	0.00	N/A *
09/15	1510 TSB	Phosphorous, Total (as P)	< 0.1 mg/L			EPA 365.3	0.00	100.0 *
09/17	1030 KIK	Solids, Total Suspended	24.0 mg/L			SM 1997 2540 D	0.00	N/A *

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Control Number: 1509020200
 Customer Name: SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number: 2292
 Report Date: 09/21/15
 Composite Date: 09/13/15 -09/14/15
 Sample Time: 0700-0745
 Sample Type: COMP/GRAB
 Sample From: DAF EFFLUENT
 Collected By: NF
 Delivery By: WDS
 Work Order:
 Purchase Order:

Laboratory Analysis

Analysis		Result		Notes		Quantity		Method		Quality Assurance	
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery			
09/14	1000 KIK	BOD, 5-day	295.0 mg/L			SM 2001 5210 B	3.33	94.4 *			
09/15	1130 TSB	Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.25	98.4 *			
09/15	0800 TSB	Kjeldahl Nitrogen Total	4.50 mg/L			SM 1997 4500-NorgB	1.16	99.7 *			
09/14	1500 TSB	Nitrate Nitrogen	0.32 mg/L			SM 2000 4500-NO3 E	0.47	103.1 *			
09/14	1210 WDS	pH	7.6 S.U.			SM 2000 4500-H+ B	0.00	N/A *			
09/15	1510 TSB	Phosphorous, Total (as P)	< 0.1 mg/L			EPA 365.3	0.00	100.0 *			
09/17	1030 KIK	Solids, Total Suspended	24.0 mg/L			SM 1997 2540 D	0.00	N/A *			

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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: 1509020281
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/21/15

Sample Date : 09/14/15
 Sample Time : 1210
 Sample Type : GRAB
 Sample From : DAF EFFLUENT

Collected By: WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis
 Date 09/15 Time By 1330 RHB
 Parameter Chemical Oxygen Demand

Result 613.0 mg/L Notes _____ Quantity _____
 Method 11/2014 HACH 8000

Quality Assurance
 Precision 0.63
 Accuracy 93.3 *
 % RPD _____
 % Recovery _____

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

Control Number: 1509020281
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/21/15

Sample Date : 09/14/15
 Sample Time : 1210
 Sample Type : GRAB
 Sample From : DAF EFFLUENT

Collected By: WDS
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis
 Date 09/15 Time 1330 By RHB
 Parameter Chemical Oxygen Demand

Result 613.0 mg/L Notes _____ Quantity _____
 Method 11/2014 HACH 8000

Quality Assurance
 Precision 0.63
 Accuracy 93.3 *
 % RPD _____
 % Recovery _____

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

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Signature Richard Brown
 Environmental Services Co., Inc.

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: 1509020210
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/22/15
 Composite Date: 09/14/15
 Sample Time : 0645-0645
 Sample Type : COMP
 Sample From : DAF EFFLUENT
 Collected By: NF
 Delivery By : KIK
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis		Result		Notes		Quantity		Method		Quality Assurance	
Date	Time By	Parameter	Result	Notes	Quantity	Method	Precision % RPD	Accuracy % Recovery			
09/16	0800 RHB	BOD, 5-day	444.0 mg/L	(b)		SM 2001 5210 B	6.43	92.9	*		
09/17	1000 TSB	Ammonia Nitrogen	0.1 mg/L			SM 1997 4500-NH3 F	3.57	97.0	*		
09/21	0830 TSB	Kjeldahl Nitrogen Total	11.20 mg/L			SM 1997 4500-NorgB	3.88	100.3	*		
09/17	1300 TSB	Nitrate Nitrogen	0.34 mg/L			SM 2000 4500-NO3 E	1.04	100.3	*		
09/17	1015 TSB	Phosphorous, Total (as P)	0.2 mg/L			EPA 365.3	0.00	100.3	*		
09/21	1440 KIK	Solids, Total Suspended	60.0 mg/L			SM 1997 2540 D	0.00	N/A	*		

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 (b) Exceeds Permit Limits for Average Concentration

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 Springdale, AR 72762
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Control Number: 1509020210
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/22/15
 Composite Date: 09/14/15 -09/15/15
 Sample Time : 0645-0645
 Sample Type : COMP
 Sample From : DAF EFFLUENT
 Collected By: NF
 Delivery By : KIK
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis		Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/16	0800 RHB	444.0 mg/L	(b)		SM 2001 5210 B	6.43	92.9 *
09/17	1000 TSB	0.1 mg/L			SM 1997 4500-NH3 F	3.57	97.0 *
09/21	0830 TSB	11.20 mg/L			SM 1997 4500-NorgB	3.88	100.3 *
09/17	1300 TSB	0.34 mg/L			SM 2000 4500-NO3 E	1.04	100.3 *
09/17	1015 TSB	0.2 mg/L			EPA 365.3	0.00	100.3 *
09/21	1440 KIK	60.0 mg/L			SM 1997 2540 D	0.00	N/A *

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 (b) Exceeds Permit Limits for Average Concentration

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


Control Number: 1509020224
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 09/24/15
 Composite Date: 09/15/15 -09/16/15
 Sample Time : 0700-0700
 Sample Type : COMP
 Sample From : DAF EFFLUENT
 Collected By: NF
 Delivery By : KIK
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis		Result		Notes		Quantity		Method		Quality Assurance	
Date	Time By	Parameter	Result	Notes		Quantity		Method	Precision % RPD	Accuracy % Recovery	
09/18	0800 KIK	BOD, 5-day	673.0 mg/L	(b)				SM 2001 5210 B	0.51	93.9 *	
09/17	1000 TSB	Ammonia Nitrogen	< 0.1 mg/L					SM 1997 4500-NH3 F	3.57	97.0 *	
09/21	0830 TSB	Kjeldahl Nitrogen Total	6.70 mg/L					SM 1997 4500-NorgB	3.88	100.3 *	
09/17	1300 TSB	Nitrate Nitrogen	0.46 mg/L					SM 2000 4500-NO3 E	1.04	100.3 *	
09/17	1015 TSB	Phosphorous, Total (as P)	0.1 mg/L					EPA 365.3	0.00	100.3 *	
09/21	1440 KIK	Solids, Total Suspended	20.0 mg/L					SM 1997 2540 D	12.90	N/A *	

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 (b) Exceeds Permit Limits for Average Concentration

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Environmental Services Company, Inc.

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 13715 West Markham
 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 Composite Date: 09/21/15 -09/22/15 Collected By: NF
 Customer Name: SAGER CREEK VEG.CO.-WW-DAF EFF. Sample Time: 0700-0630/1300 Delivery By: WDS
 Customer Number: 2292 Sample Type: COMP/GRAB Work Order:
 Report Date: 09/30/15 Sample From: DAF EFFLUENT Purchase Order:

Laboratory Analysis

Analysis		Result		Notes	Quantity	Method	Quality Assurance	
Date	Time By	Parameter		(b)			% RPD	% Recovery
09/23	0800 KIK	BOD, 5-day	1790.0 mg/L			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 KIK	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

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Signature Richard Bloom
 Environmental Services Co., Inc.

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: 1509020364
 Customer Name : SAGER CREEK VEG. CO. -WW-DAF EFF.
 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 :

Laboratory Analysis			
Date	Time	By	
09/25	1.115	RHB	
Parameter	Result	Notes	Quantity
Chemical Oxygen Demand	2460.0 mg/L		
			Method
			11/2014 HACH 8000

Quality Assurance
 Precision % RPD 1.67
 Accuracy % Recovery 96.0 *

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Signature Richard Brown
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Corporate Office
 13715 West Markham
 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: 1509020317
 Customer Name: SAGER CREEK 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:

Laboratory Analysis

Analysis		Result		Notes	Quantity	Method	Precision	Quality Assurance
Date	Time BY	Parameter	Result				% 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-NORG B	3.54	97.3 *
09/28	1030 TSB	Nitrate Nitrogen	0.94 mg/L			SM 2000 4500-NO3 B	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 *

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Signature Richard Bowman
 Environmental Services Co., Inc.

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: 1509020325
 Customer Name : SAGER CREEK VEG.CO.-WW-DAF EFF.
 Customer Number : 2292
 Report Date : 10/01/15
 Composite Date: 09/23/15 -09/24/15
 Sample Time : 7:00-7:00/14:10
 Sample Type : COMP/GRAB
 Sample From : DAF EFFLUENT
 Collected By: NF
 Delivery By : WDS
 Work Order :
 Purchase Order :

Laboratory Analysis

Analysis	Result	Notes	Quantity	Method	Precision % RPD	Quality Assurance Accuracy % Recovery
09/25 0800 TSB BOD, 5-day	1913.0 mg/L	(b)		SM 2001 5210 B	4.34	104.9 *
09/25 1430 TSB Ammonia Nitrogen	< 0.1 mg/L			SM 1997 4500-NH3 F	2.30	102.3 *
09/30 1000 TSB Kjeldahl Nitrogen Total	8.90 mg/L			SM 1997 4500-NorgB	1.32	101.0 *
09/28 1030 TSB Nitrate Nitrogen	1.00 mg/L			SM 2000 4500-NO3 E	0.00	100.5 *
09/24 1410 WDS pH	6.9 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 *
09/30 0840 KIK Solids, Total Suspended	27.0 mg/L			SM 1997 2540 D	7.41	N/A

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Signature Richard Broom
 Environmental Services Co., Inc.