



**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	02/22/2018		
Media:	Water		
Regulatory Program(s)	Clean Water Act		
Company Name:	House of Raeford Farms, Inc.		
Facility Name:	House of Raeford Farms, Inc.		
Facility Physical Location:	3867 Second Street		
(city, state, zip code)	Arcadia, LA 71001		
Mailing address:	3867 Second Street		
(city, state, zip code)	Arcadia, LA 71001		
County/Parish:	Bienville Parish		
Facility Contact:	Mark Van Benthuyzen	Complex Manager	
	Jimmy Adams	Wastewater Manager	
	Kevin Pittman	Complex Safety Manager	
	318-263-9004		
FRS Number:			
Identification/Permit Number:	LA0002844		
Media Number:	AI#25163		
NAICS:	311615		
SIC:	2016		
Personnel participating in inspection:			
Michael Williams	EPA / 6EN-WMH	Inspector	281-983-2150
Mandi Paine	LDEQ	Inspector	318-676-7475
Andrew Sherman	LDEQ	Inspector	318-676-7475
Jimmy Adams	House of Raeford	Wastewater Manager	318-263-9004
Mark Van Benthuyzen	House of Raeford	Complex Manager	
Kevin Pittman	House of Raeford	Complex Safety Manager	
EPA Lead Inspector Signature/Date			
	Michael D. Williams		Date
Supervisor Signature/Date			
	Carol Peters		Date

Section I - Introduction

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Michael Williams, arrived at the House of Raeford Farms, Inc. at 10:08 am on February 22, 2018 for an unannounced inspection. I met with Mark Van Benthuyzen, Complex Manager. I presented my credentials to Mark and informed him that this was an EPA lead inspection to determine compliance with the Clean Water Act. The scope of the inspection was with permit LA0002844 and facility operations and maintenance under the Clean Water Act.

The information presented in this report is based on the materials and information supplied by House of Raeford representatives (the permittee), observations made during the inspection and records and reports maintained by the permittee.

FACILITY DESCRIPTION

House of Raeford is located at 3867 Second Street, Arcadia, Louisiana. The plant is a poultry processing plant that processes various types of fowl for human consumption. The plant has a large water demand due to numerous wash down cycles per day. The process areas include stunning and bleeding, scalding, de-feathering, evisceration, inspection area and a chilling area.

The process wastewater, truck wash water, boiler blowdown, refrigeration condenser overflow, wood pallet wash water, poultry cage wash water and storm water are discharged to the facility wastewater treatment plant. The wastewater treatment plant has an anaerobic lagoon, secondary pond, anoxic basin, aeration basin, clarifier and disinfection chamber. The site discharges to local drainage which flows into Brinson creek, thence into Black lake.

Section II- Observations

This inspection revealed the following observations:

- *Anaerobic Lagoon* - During the inspection the anaerobic lagoon and secondary pond appeared to have high accumulation of oil, grease and solids reducing the capacity of the units. There was no freeboard space available to ensure no overflow of the earthen berms.
- *Sample Storage* – On the day of the inspection, the facility utilized one refrigerator for samples and personal food storage which could contribute to cross contamination.
- *Bypass*- On the day of the inspection, the facility had an unauthorized discharge from the second lagoon. The bypass resulted from the discharge of wastewater over the berm of the lagoon into the local drainage. (See Attachment A & B)

Section III- Areas of Concerns

This inspection revealed the following areas of concerns:

Proper Operation and Maintenance

- The permittee is required to properly operate and maintain all facilities and systems at all times. To ensure House of Raeford can meet the original design specification of the treatment system, sludge and solids removal should be part of the management of the lagoons. House of Raeford needs to identify practices that minimize sludge accumulation, identify the criteria when sludge needs to be pumped down or removed and develop a process to monitor sludge and grease accumulation.
- Bypass is prohibited in the House of Raeford permit. House of Raeford failed to maintain the 2 feet freeboard space in the anaerobic lagoon or the secondary pond to ensure capacity was available. House of Raeford needs to evaluate the integrity of all earthen berms to ensure the berm is not compromised in the future.

Section IV – LIST OF APPENDICES

- Appendix A – House of Raeford Photo log
- Appendix B – Site Map
- Appendix C – Unauthorized Discharge Notification Letter

Appendix A

House of Raeford Photo log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: House of Raeford Farms, Inc.		
City: Arcadia	County/Parish: Bienville	State: Louisiana





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: House of Raeford Farms, Inc.		
City: Arcadia	County/Parish: Bienville	State: Louisiana





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: House of Raeford Farms, Inc.		
City: Arcadia	County/Parish: Bienville	State: Louisiana





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: House of Raeford Farms, Inc.		
City: Arcadia	County/Parish: Bienville	State: Louisiana





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: House of Raeford Farms, Inc.		
City: Arcadia	County/Parish: Bienville	State: Louisiana





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: House of Raeford Farms, Inc.		
City: Arcadia	County/Parish: Bienville	State: Louisiana





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: House of Raeford Farms, Inc.		
City: Arcadia	County/Parish: Bienville	State: Louisiana



Appendix B

Site Map

Appendix C

Unauthorized Discharge Notification Letter



The One With Real Taste

HOUSE OF RAEFORD FARMS OF LOUISIANA, LLC.

Post Office Box 707 • Arcadia, Louisiana 71001

Ph. (318) 263-9004 • Fax (318) 263-3077

3/1/18

518-109.32.2

T 183052

Aranda Rene

February 23, 2018

Louisiana Department of Environmental Quality
Assessment Division – SPOC “Unauthorized Discharge Notification Report”
Post Office Box 4312
Baton Rouge, LA 70821-4312

Re: Non-Emergency Unauthorized Discharge Notification Letter
House of Raeford Farms of Louisiana, LLC.
Arcadia Processing Plant
3867 Second Street
Arcadia, Louisiana
Bienville Parish
Incident No.: 18-00915
Agency Interest No.: 25163

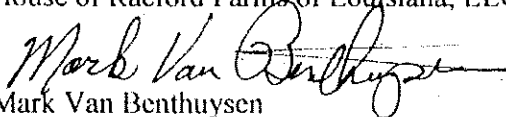
To Whom It May Concern:

In accordance with the Louisiana Pollutant Discharge Elimination System (LPDES) permit no. LA0002844, Section D.6.b and LAC 33:1.3915, Notification Requirements for Unauthorized Discharges That Do No Cause Emergency Condition, the House of Raeford Farms of Louisiana, LLC. (House of Raeford), is submitting written notification of a non-emergency unauthorized discharge of partially (anaerobic lagoon) treated wastewater at the at the above-referenced site. A written notification form is provided in **Appendix A, Written Notification Form**. The site location is shown in **Figure 1, Site Map**, in **Attachment B, Figures**. Site features and sample locations are shown on **Figure 2, Site Map**. Wash water and storm water flow is illustrated on **Figure 3, Wash Water and Storm Water Flow Diagram**. Waste water flow is illustrated on **Figure 4, Waste Water Flow Diagram**.

If you have any questions or need additional information, please do not hesitate to contact me at (318) 323-7270.

Sincerely,

House of Raeford Farms of Louisiana, LLC.


Mark Van Benthuyzen
Complex Manager

RECEIVED
ON

MAR 05 2018

BY
LDEQ/SPOC

“From Our House To Yours”

DISPATCH #: _____ INCIDENT #: 18-00915

UNAUTHORIZED DISCHARGE NOTIFICATION REPORT

This form should be completed and submitted to Surveillance Division within seven (7) calendar days after verbal notification.

If mailed, submittal date will be the postmark date of the written notification. Forward to:

Louisiana Department of Environmental Quality
Assessment Division - SPOC
P.O. Box 4312
Baton Rouge, LA. 70821 4312

1. Name of person, company or other party who is filing the written report.

Mark Van Benthuisen, Complex Manager

House of Raeford Farms of Louisiana, LLC.

2. Time and date of verbal notification, name of person making the notification, and identification of the site or facility. (Name and address)

Approximately, 2:00 a.m. on February 22, 2018. Initial call was made at 10:45 a.m., was able to get through at 2:00 p.m.

3. Release date and time.

February 22, 2018, 6:30 a.m.

4. Incident details and/or emergency conditions. (Ex. cause of spill, injuries, possible hazards related to the incident)

Due to excessive rainfall (6-inches between February 21-22, 2018), the secondary holding pond levee was breached on February 22, 2018, for a short period (6:30 am – 12:00 am) until the excess wastewater could be pumped to the wastewater treatment plant.

In accordance with LPDES permit no. LA002844, Permit Requirements N-6 (LAC 33:IX.2701), *Stormwater from the shipping and loading dock and parking lot is captured by a newly installed head walls and stormwater collection system that is routed to Float-Activated Lift station #2, located near shipping and loading dock, and pumped to the onsite wastewater lagoon for treatment. The first flush stormwater is diverted to the onsite wastewater lagoon for 45 minutes to 1 hour or until all surface contaminants have been pumped to the onsite wastewater lagoon. Once all the contaminants have been pumped to the onsite wastewater lagoon, facility personnel will turn off Lift Station #2, and allow uncontaminated stormwater to discharge through natural drainage, by-passing the onsite wastewater lagoon. First flush stormwater is defined as the first one (1) inch of precipitation to fall on the 8-acre facility, which is the equivalent of the first 217,234 gallons.*

Once the secondary pond excess water had been removed, House of Raeford investigated the cause of the excess accumulation of water in the pond in order to prevent any future incidences. During the investigation it was discovered that the stormwater lift station pump installed to capture the first flush stormwater was turned on by personnel at the end of the shift Wednesday evening and not turned off again until the overflow was discovered at 6:30 a.m. on February 22, 2018. The pump ran for approximately 13 hours. The pump is capable of pumping approximately 550 gallons per minute (gpm), resulting in excess accumulation of water in the secondary pond.

5. Product released and estimated quantity released in gallons or barrels.

During the 5.5 hour (6:30 a.m. – 12:00 noon) period it is estimated that approximately 6,600 gallons of partially (anaerobic lagoon) treated wastewater, first-flush stormwater, and excess non-contaminated stormwater by-passed the wastewater treatment plant

(WWTP). The point of the breach was located on the southeast corner of the secondary pond as shown on Figure 2.

- 6. Surface or groundwater impact. (If the spillage impacted waters of the state give the names of the adjacent bayous, creeks, lakes rivers that the impacted waterway drains into etc)**

Surface water impact.

Local drainage, thence into Brinson Creek, thence into Black Lake (100702).

The site location is shown in Figure 1, Site Map, in Attachment A, Figures. Site features and sample locations are shown on Figure 2, Site Map. Wash water and stormwater flow is illustrated on Figure 3, Wash Water and Stormwater Flow Diagram. Wastewater flow is illustrated on Figure 4, Wastewater Flow Diagram.

- 7. Action taken to stop the release.**

Once the breach was discovered the following actions were taken:

- The wastewater treatment plant technician took immediate action to reduce the level in the secondary pond by activating all available pumps, which increased the flow to the WWTP from the typical 500 gpm to 1,400 gpm.**
- Installed a Honda gas-operated water pump help pump the water from the secondary pond to the WWTP in order to treat the wastewater prior to discharge in accordance with LPDES permit No. LA002844.**
- Add rock to the berm at the location of the overflow.**

- 8. Measures taken to prevent recurrence of the incident.**

In an effort to prevent this type of incident from happening in the future, House of Raeford will implement the following:

- Add impermeable berm material and rock to low areas of the berm to make the berm's crown elevation more uniform;**

- Immediately, conduct a refresher course on the SWPPP procedures for all personnel with access to the stormwater pump; and,
- Evaluate using electronic rain gauges that will alarm and deactivate the stormwater lift station pump once the first flush period (1-inch of rainfall) is completed.

9. Mitigation of incident. Ex. (Cleanup performed as well as projected clean up plans if applicable)

Not applicable

10. If excavation was performed describe method that has or will be used to determine that the impacted area is or will be free of spillage. (Ex. Confirmatory samples have been pulled and results will be forwarded to the Department)

Not applicable

11. Waste. If waste was generated from mitigation of the incident:

- a. describe the type and amount of waste generated or projected to be generated

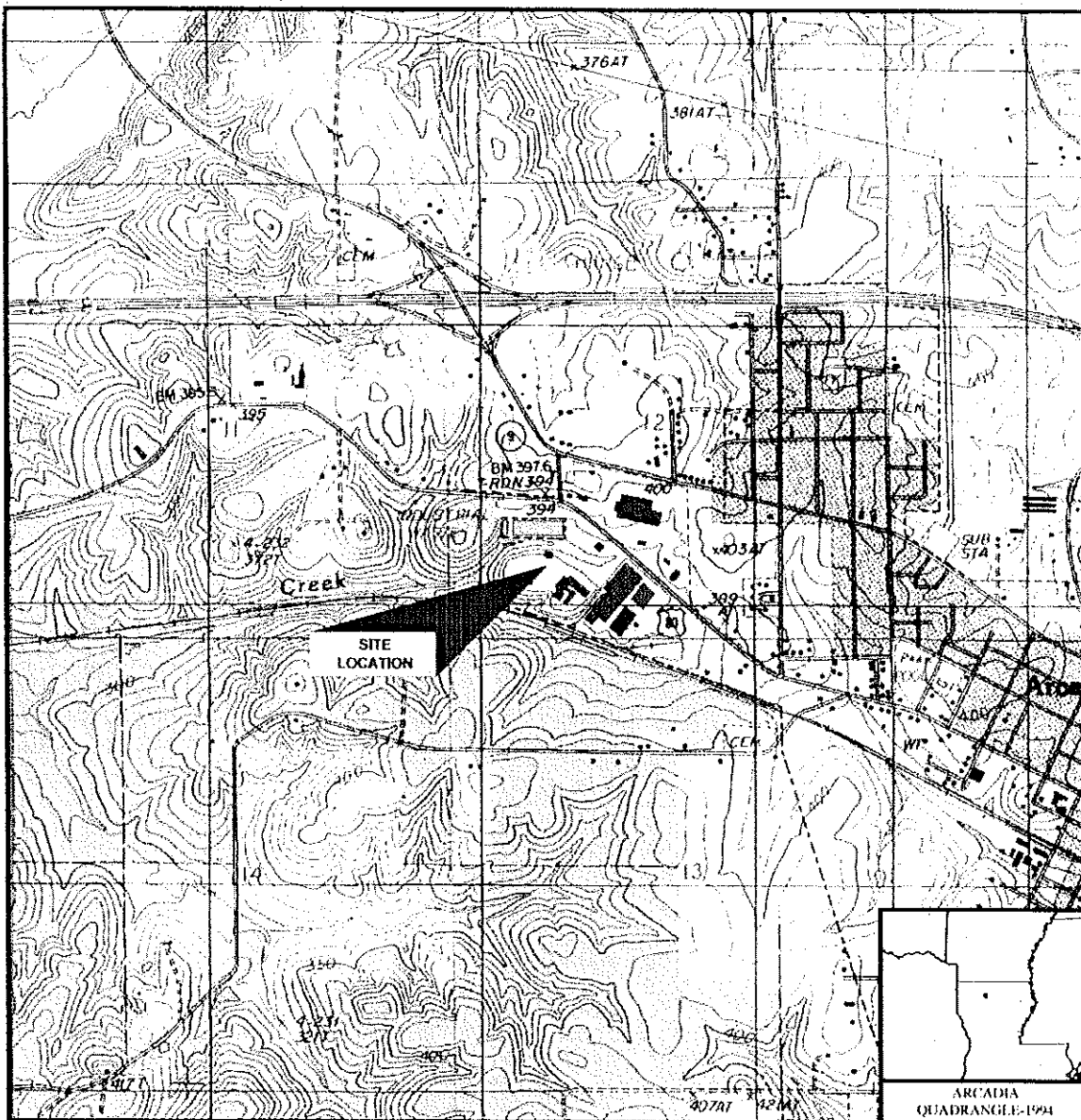
Once contained, all wastewater was treated by the on-site WWTP and discharged in accordance with LPDES permit No. LA002844.

- b. describe the disposal of waste generated (Ex. Waste has been profiled for disposal and will be disposed of at facility x and documents will be forwarded to the department)

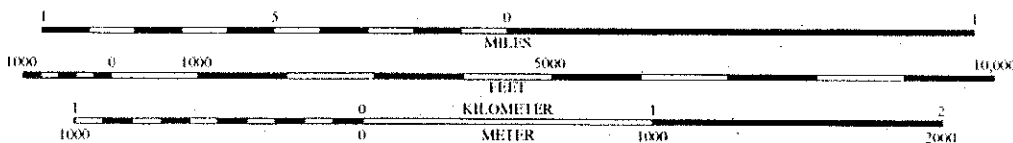
No waste was generated.

12. Offsite impact. Date landowner was notified. (Include landowners name and phone number)

No offsite impact occurred.



SCALE: 1 : 24,000



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BWH

DRAWN DATE
01/09/15

PROJECT NUMBER
10Q13104

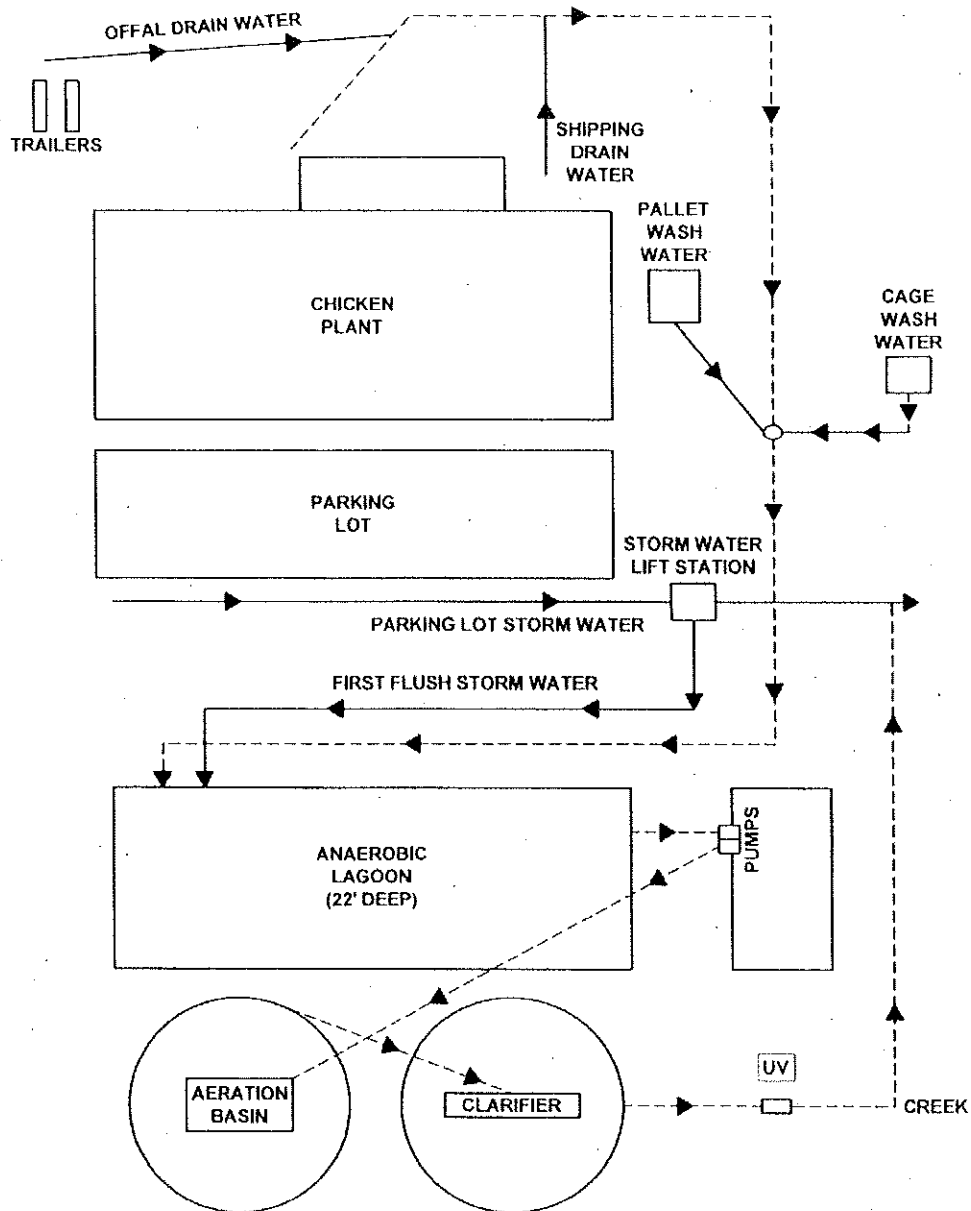
BILLING GROUP
WPR

HOUSE OF RAEFORD FARMS,
INC.
ARCADIA PROCESSING PLANT
3867 SECOND STREET
ARCADIA, LOUISIANA

SITE LOCATION MAP

FIGURE
NUMBER

1



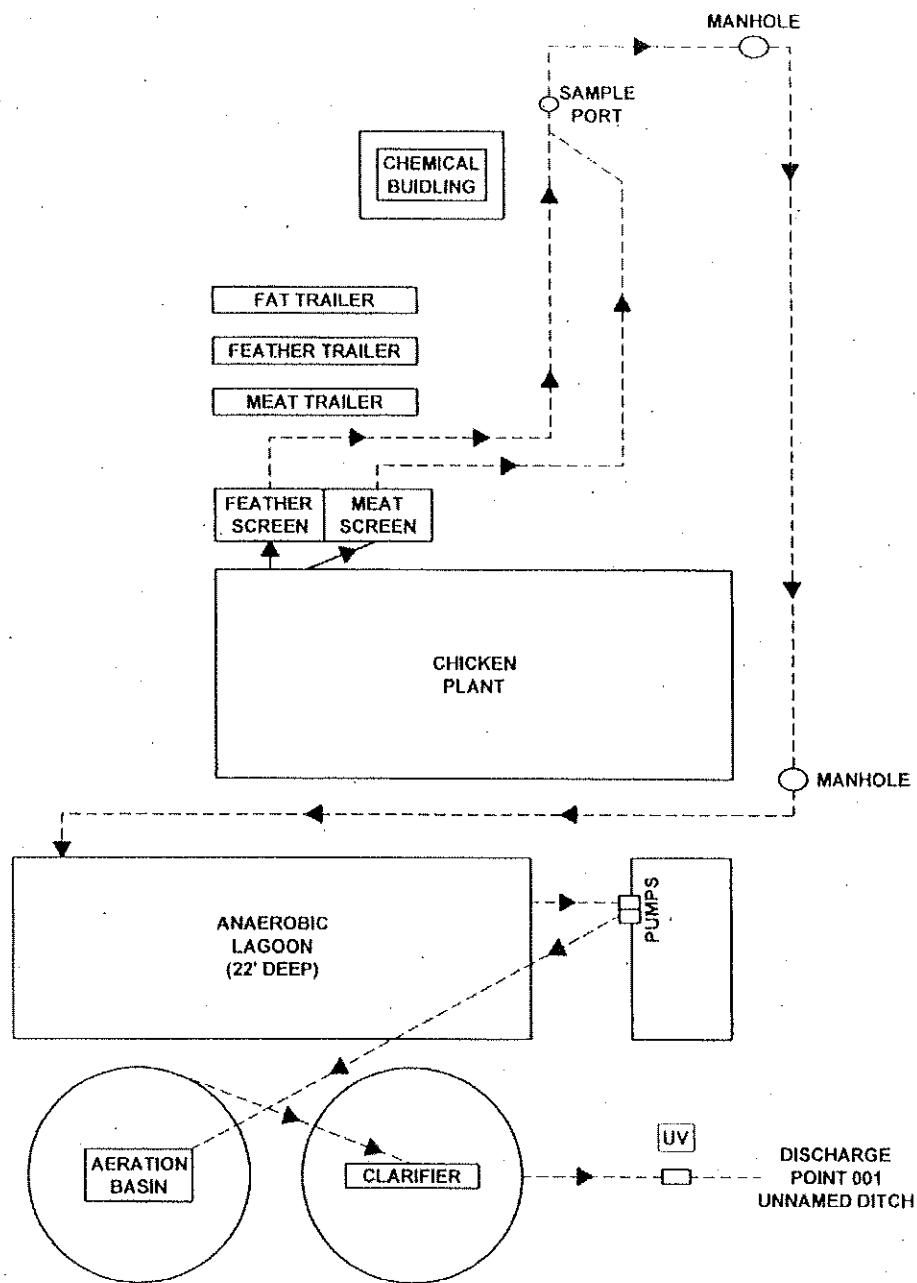
PPM PPM CONSULTANTS, INC. www.ppmco.com	
DRAWN BY: BWH	DRAWN DATE: 01/09/15
PROJECT NUMBER: 10013104	BILLING GROUP: WPR

HOUSE OF RAEFORD FARMS,
 INC.
 ARCADIA PROCESSING PLANT
 3867 SECOND STREET
 ARCADIA, LOUISIANA

WASH WATER
 FLOW DIAGRAM

FIGURE NUMBER

3



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01/09/15

PROJECT NUMBER
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BILLING GROUP
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HOUSE OF RAEFORD FARMS,
INC.
ARCADIA PROCESSING PLANT
3867 SECOND STREET
ARCADIA, LOUISIANA

WASTE WATER
FLOW DIAGRAM

FIGURE
NUMBER

4