

[REDACTED]
Inspection Date 07/11/2023



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	07/11/2023	
Media Program:	Water	
Regulatory Program(s)	CAFO	
Company Name:	[REDACTED]	
Facility Name:	[REDACTED]	
Facility Physical Location:	[REDACTED]	
(city, state, zip code)	[REDACTED] AR [REDACTED]	
Mailing address:	[REDACTED]	
(city, state, zip code)	[REDACTED]	
County/Parish:	Polk	
Facility Phone Number	[REDACTED]	
Facility Contact:	[REDACTED]	Owner
FRS Number:	36015 [REDACTED]	
Identification/Permit Number:	ARU00 [REDACTED]	
Media Identifier Number:	N/A	
NAICS:	112210	
SIC:	0213	
Personnel participating in inspection:		
[REDACTED]	Owner	Owner
Lucas Bomar	EPA/6ECAD-AA	Inspector
Juan Ibarra	EPA/6ECAD-AA	Inspector
Monica Hancock	AR Dept of Ag	Inspector
Richard Gray	JBS (Integrator)	Environmental Manager
EPA Lead Inspector Signature/Date	[REDACTED]	
	{Inspector name}	Date
Supervisor Signature/Date	[REDACTED]	
	{Supervisor name}	Date

[REDACTED]
Inspection Date 07/11/2023**Section I – INTRODUCTION****PURPOSE OF THE INSPECTION**

EPA Region 6 inspectors Juan Ibarra and Lucas Bomar, accompanied by Monica Hancock of the Arkansas Department of Agriculture, arrived at [REDACTED] at 0832 on July 11, 2023, for an announced inspection (due to JBS biosecurity farm sequencing requirements). We met with [REDACTED] owner and Richard Gray/JBS Environmental Manager at the Opening Conference. I presented my credentials to [REDACTED] and informed him that this was an EPA inspection to determine the facility's compliance status with the requirements of the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) Concentrated Animal Feeding Operation (CAFO) regulations stipulated within the facility's Arkansas Department of Environmental Quality (ADEQ) Regulation No. 5 AFO general permit. The scope of the inspection included a limited compliance evaluation of the facility's site operations (due to ongoing heavy rain at the time of the inspection), lagoon management, nutrient management plan, and record keeping requirements of their ADEQ permit. Observation of the land application fields was not possible due to the heavy rain. For biosecurity purposes, the inspectors toured the site in Mr. Gray's vehicle and wore the JBS required Tyvek suits and over-boots. There were no other biosecurity or disease issues of concern at the farm.

FACILITY DESCRIPTION

[REDACTED] has a current ADEQ permit [REDACTED] for 2800 finishing swine. The pigs are brought to the farm at approximately 50 lbs and are raised to about 300 lbs over a period of about 18-20 weeks. At the time of the inspection, [REDACTED] stated that only one of the four barns were stocked with swine, which were brought in the day before the inspection, and that one barn will be stocked per week until all are filled. Then the swine will be removed on a weekly schedule after their 18-20 week stay and growth to approximately 300 lbs. Each barn will be stocked at a rate of 600 pigs per barn.

The farm's four barns are flushed multiple times per day using lagoon recycled water. The flushing frequency is dependent on the size of the pigs and the time of year. The flush water drains within each of the barns on a 1.5% slope to a concrete catch basin which then channels the wastewater to the single lagoon through an 8" drainage pipe. The farm also has 25 land application fields totaling 374 acres. Land application is made by a traveling reel gun or a tanker truck for times when an agitator is used to slurry and remove solids from the lagoon.

The farm has a Certified Nutrient Management Plan (CNMP) dated [REDACTED]/2021 written by an Arkansas District Conservationist, followed by a review and signature by the NRCS and ADEQ. The Arkansas Department of Agriculture will assume the ADEQ's regulatory responsibility of permitting, inspecting and enforcement of the Regulation No. 5 AFO lagoon systems on 8/1/2023.

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Section II – OBSERVATIONS

The farm appears well managed, clean, and organized with no apparent deficiencies noted during the inspection. The CNMP records for facility inspections and maintenance are in good order. [REDACTED] submitted the required annual reports to ADEQ for the years of 2021 and 2022 (see Photos 4-6 showing the land application records for 2021). JBS also requires that their contract farms provide monthly reports detailing the lagoon level, which [REDACTED] has done. However, there was no written documentation of these lagoon level readings in the CNMP, as they are not required by the ADEQ Regulation No. 5.

The agronomic rate calculations have been done correctly, using 2020 soils data and recent lagoon wastewater analysis data. Additionally, the P-Index was rated as “Medium” and allowed for additional application of wastewater containing phosphorus. The farm was maintaining daily land application irrigation records which are submitted to the ADEQ in the annual report.

The lagoon (see Photo 1) has a pole marker, and the level was below the 25-yr/24-hr event mark. The embankment appears well vegetated, and there was no evidence of a discharge. The available freeboard is estimated to be approximately four feet. Mortalities are managed using an incinerator and the ash is land applied.

Section III – AREAS OF CONCERN

None

Section IV – FOLLOW UP

None

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – Six photos taken 7/11/2023 and Digital Globe aerial photograph

Appendix 1

Photograph Log and Site Aerial



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: [REDACTED]		
City: [REDACTED]	County: Polk	State: Arkansas



Photo File Name: DSCN0079.JPG

Date of Photo: 07/11/2023

Time of Photo: 0855

Photographer: Juan Ibarra

Description: The farm's single wastewater lagoon which has approximately 4' of freeboard. The unit has a pole marker at the northeast corner of the unit where the long bar represents the 25-year/24-hour pump out mark. There is a wastewater pump which is connected to the riser that sends the wastewater to the risers located in the land application fields which are equipped with a traveling reel gun. The view is toward the northwest.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location [REDACTED]		
City [REDACTED]	County: Polk	State: Arkansas



Photo File Name: DSCN0081.JPG

Date of Photo: 07/11/2023

Time of Photo: 0942

Photographer: Juan Ibarra

Description: One of the farm's four swine barns, with the incinerator that is used for mortality management in the foreground. The view is toward the northeast.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: [REDACTED]		
City: [REDACTED]	County: Polk	State: Arkansas



Photo File Name: DSCN0082.JPG

Date of Photo: 07/11/2023

Time of Photo: 0942

Photographer: Juan Ibarra

Description: Looking east between the barns. The grounds are well maintained and neat. Silver covers can be seen covering the flush water drain pit at the barn to the right of the photo that direct wastewater to the lagoon.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: [REDACTED]		
City: [REDACTED]	County: Polk	State: Arkansas

2021

**ANIMAL WASTE LAND APPLICATION RECORD
FOR PERMITTED CONFINED ANIMAL FACILITIES**

PERMITTEE NAME: [REDACTED] PERMIT NUMBER: _____

APPLICATION METHOD: _____

Field Name or Land Number	Date Applied	Crop Type	Area Applied (acres)	Volume Applied (gallons)
✓ 19	4-20-21	Grass	25	124,275
✓ 14	5-5-21	Grass	12	84,350
✓ 15	5-6-21	Grass	8	52,900
✓ 4	5-7-21	Grass	15	125,388
✓ 16	6-17-21	Grass	20	119,556
✓ 20	6-18-21	Grass	10	94,770
✓ 17	6-19-21	Grass	9	91,125
✓ 17	6-19-21	Grass	15.8	148,716
✓ 18	6-20-21	Grass	12	87,480
✓ 1	6-28-21 6-29-21	Grass	20	143,136
✓ 7	7-21-23	Grass	30	238,560
✓ 5	7-25-23	Grass	4	40,320

NOTE: Facility record; DO NOT MAIL THIS; Keep this record at the facility.
Make additional copies of this table as needed.

Photo File Name: DSCN0083.JPG

Date of Photo: 07/11/2023

Time of Photo: 0946

Photographer: Juan Ibarra

Description: Daily land application records kept by the owner for 2021.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: [REDACTED]		
City: [REDACTED]	County: Polk	State: Arkansas

ORD
ITIES

ANNUAL ANIMAL WASTE LAND APPLICATION REPORT
Nitrogen Application Rate*

PERMITTEE NAME [REDACTED] PERMIT NUMBER [REDACTED]

Field Name or/and Number (1)	Crop Type (2)	Total** Area Applied (acres) (3)	Total*** Volume Applied (gallons) (4)	Total**** Nitrogen (lbs/1000 gal.) (5)	Calculated Nitrogen Applied (lbs/ac) (6)
1	Grass	20	143,136	7.3	39.1
5	Grass	4	40,320	7.3	55.1
4	Grass	15	125,388	7.3	45.7
14	Grass	12	84,350	7.3	38.4
15	Grass	8	52,900	7.3	36.2
16	Grass	20	119,556	7.3	32.7
17	Grass	25	239,841	7.3	52.5
18	Grass	12	87,480	7.3	39.9
19	Grass	25	124,275	7.3	27.2
20	Grass	10	44,770	7.3	51.9
7	Grass	30	238,560	7.3	43.5

* An updated Arkansas Nutrient Management Planner based on the waste and soil analyses may be submitted in place of this table.
 **Total available area is the area where manure was applied during the reporting period (this data can be obtained from the management plan).
 ***Total volume applied is the total volume applied to the field during the whole reporting period (this data can be obtained from record sheet).
 ****Total Nitrogen concentration (lbs/1000 gallons) can be obtained from the wastewater analysis sheet.

Column (6) = Nitrogen Applied (lbs/ac) = Column (4) X Column (5) ÷ Column (3) ÷ 1,334
 NOTE: You may make additional copies of this table as needed.

Photo File Name: DSCN0084.JPG

Date of Photo: 07/11/2023

Time of Photo: 0946

Photographer: Juan Ibarra

Description: The 2021 Annual land application summary record for nitrogen application.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: [REDACTED]		
City: [REDACTED]	County: Polk	State: Arkansas

ANNUAL ANIMAL WASTE LAND APPLICATION REPORT
Phosphorus Application Rate*

PERMITTEE NAME: [REDACTED] PERMIT NUMBER: [REDACTED]

Field Name or/and Number (1)	Crop Type (2)	Total** Area Applied (acres) (3)	Total*** Volume Applied (gallons) (4)	Total**** Phosphorus As P ₂ O ₅ (lbs/1000 gal.) (5)	Calculated Phosphorus Applied (lbs/ac) (6)
1	Grass	20	143,136	1.0	7.2
4	Grass	15	125,388	1.0	8.4
5	Grass	4	40,320	1.0	10.1
7	Grass	30	238,560	1.0	8
14	Grass	12	84,350	1.0	7
15	Grass	8	52,900	1.0	6.6
16	Grass	20	119,556	1.0	6
17	Grass	25	239,841	1.0	9.6
18	Grass	12	87,480	1.0	7.3
19	Grass	25	124,275	1.0	5
20	Grass	10	94,770	1.0	9.5

*The Phosphorus Application Rate only needs to be reported if required by your permit. An updated Arkansas Nutrient Management Planner based on the waste and soil analyses may be submitted in place of this table.

**Total available area is the area where manure was applied during the reporting period (this data can be obtained from the management plan).

***Total volume applied is the total volume applied to the field during the whole reporting period (this data can be obtained from record sheet).

****Total Phosphorus as P₂O₅ concentration (lbs/1000 gallons) can be obtained from the wastewater analysis sheet.

Column (6) = Phosphorus Applied (lbs/ac) = Column (4) X Column (5) ÷ Column (3) ÷ 1,000

NOTE: You may make additional copies of this table as needed.

Photo File Name: DSCN0085.JPG

Date of Photo: 07/11/2023

Time of Photo: 0947

Photographer: Juan Ibarra

Description: The 2021 Annual land application summary record for phosphorus application.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: [REDACTED]		
City: [REDACTED]	County: Polk	State: Arkansas

[REDACTED] DigitalGlobe Aerial View from 3/19/2023

Four swine barns and one lagoon. An unimpacted freshwater stock tank is located to the west of the lagoon:

