



Industrial User Facility Inspection Report U.S. EPA, Region 8

Name of industry and location:

JR Daily's Premium Meats, LLC
2900 Mullan Road
Missoula, Montana 59808

Control Authority / NPDES Permit No.

City of Missoula
NPDES Permit No. MT-0022594

IU – NPDES ID

MTP000008

Date of visit:

September 27, 2023

Approximate Time of visit:

1300 – 1444

Name(s) / Affiliation / email of inspector(s):U.S. EPA:

Lisa-kay Prideaux, prideaux.lisakay@epa.gov

City of Missoula:

- Nate Gordon, Gordonn@ci.missoula.mt.us

General Facility Information:Representatives at Inspection:

- Lonnie Stevens, FSQA Manager, lonnie.stevens@dailysmeats.com
- Van LeFeure, Maintenance Manager, vanlefeure@dailysmeats.com

Type of Business Operations:

- Pork Products

Facility Information (processing/sanitation):

- Employees: approximately 85
- Production: Monday-Friday, day shift (06:00-14:30), 40-50 employees
night shift (15:00-23:30), 35 employees
Saturday (if needed) varies from full shifts to 4 hours each shift
- Sanitation: Monday-Friday, 23:30-05:00, 7 contract employees (Sparks Sanitation)
Saturday (if production occurs) 23:30-05:00, 7 contract employees
Sunday (smokehouse cleaning) 18:00-05:30, 2-3 contract employees

Inspection Description:

Lisa-kay Prideaux from the U.S. Environmental Protection Agency (EPA), and Nate Gordon from the City of Missoula (City) conducted an oversight significant industrial user (SIU) inspection of the JR Daily's Premium Meats, LLC facility (the facility) located on 2900 Mullan Road, Missoula, MT 59808. The SIU inspection was conducted as part of the EPA Pretreatment audit of the City's Publicly Owned Treatment Works (POTW) Pretreatment Program and is intended to provide a general overview of the facility to ensure the Pretreatment records reviewed by the EPA adequately address current conditions at the facility. The EPA oversight SIU

inspection consisted of an evaluation of the wastestreams generated from the unit operations and processes at the facility, including potential for spills and slug discharges. The facility discharges to the sewer collection system leading to the City's POTW.

Upon arriving at the facility on September 27, 2023, at approximately 13:00 p.m., Lisa-kay Prideaux of the EPA presented credentials to the facility representatives and explained the purpose of the inspection. During the opening interview, the facility representatives provided an overview of the operations and processes at the facility, wastestreams generated and management of these wastestreams. The opening interview was followed by a facility tour to visually inspect the unit operations. The EPA conducted a closing conference to discuss potential findings and recommendations identified during the inspection.

Process Description:

The JR Daily's Premium Meats facility located at 2900 Mullan Road, Missoula, MT 59808 is a meat processing facility where raw pork bellies are processed to make bacon since 1893. The facility produces approximately 110,000 pounds of bacon daily. The facility requires all incoming and outgoing shipping persons to notify the facility the truck is at the facility and ready for loading/unloading. When the facility is ready for the truck, they are notified to back into the dock and facility personnel load and unload all trucks. The raw pork bellies are received from a refrigerated truck in large vats and are transported via forklift, immediately into a walk-in cooler. Because the facility is subject to the Food and Drug Administration (FDA), the facility restricts people and materials to certain regions of the facility to limit exposure.

Raw materials include raw pork bellies. Chemicals used in the facility include sodium phosphate and flavoring for the pickling solution and sodium chloride for brine solution used in chilling. Cleaning agents used include sodium hydroxide, non-phosphorus degreasers, sanitizers, and mineral oil. Processing chemicals and cleaning chemicals are stored in two separate areas within the facility. All chemicals are stored within the gated area unless they are opened and being used on the product line. Each area is gated and locked with limited access to keys. Once in the production area, chemical solutions are placed on a secondary containment structure. It appears that the facility has adequate spill containment equipment/measures to minimize the potential for spills to occur to the sanitary sewer.

The raw pork bellies stored in the walk-in coolers remain in the cooler for approximately one day. From the coolers, they are brought to an area for manual trimming. The facility generates approximately 300 pounds of solid waste each day, which is placed in a bin for solid waste removal to the landfill. After the pork bellies are trimmed, they are placed in an automated machine that injects the pork bellies with a pickling solution. The machine includes a rubber skimmer to remove as much excess solution as possible and it is saved and stored for future use. The facility creates six batches of pickling solutions each day for the curing of the pork bellies. Each batch is approximately 280 gallons and is stored in the mixing basins until it is pumped to the injection machine. Liquid not captured for reuse by the skimmer is discharged to the floor drain. The metal mixing basins are housed over a floor lined containment area.

The pork bellies are then hung on a 'tree' rack and either sent to the cooler or sent to the smokehouse. The pork bellies not going to the smoke house are brought to a storage cooler for up to two days prior to processing and packaging. The pork bellies sent to the smokehouse are put in one of two smokerooms for approximately 8.5 hours. Although the process of smoking is dry, there are floor drains in each smokeroom for cleaning. After the smokehouse, pork bellies are then brought to the brine chiller. The brine chiller quickly reduces the temperature of the pork bellies by spraying them with chilled brine water. The facility mixes their own brine solution each week. The brine solution prepared is approximately 600 gallons and stored outside the cooler in a plastic tote. The tote sits on a secondary containment platform. Excess brine water is collected and pumped through a screen and UV system prior to re-entering the spray system. The excess solution at the end of the week is discharged as wastewater. The pork bellies are then sent to a cooler prior to processing and packaging.

Processing includes pressing, trimming, slicing, and packaging. Pork bellies are removed from the tree racks in the cooler and brought to the processing area where they are sent through a machine that presses and slices the pork bellies into bacon strips. The sliced bacon then goes to an assembly line where the meat is graded, weighed, wrapped, boxed and bulk packaged onto a wood pallet. The packaged bacon is then put in a cooler to await a truck for shipping.

At the end of each day, a contract cleaning crew cleans the equipment and rooms. All walls and floors are cleaned with a de-greaser, cleaning products, spray rinse, and sanitizer. Cleaning solutions are non-phosphorus. Equipment is washed with a degreaser and cleaning products, spray rinsed, sanitized, and then treated with a mineral oil. When the processed bellies are removed from the trees, the trees go through a wash which consists of a dilute de-greaser, cleaner, power rinse, and sanitizer. The degreaser is captured and reused on the next set of trees. Each night the degreaser is discharged as wastewater. The smokerooms are cleaned once per week. The rooms are cleaned with a sodium hydroxide/water mixture, then a rinse. The solution and rinse water are discharged as wastewater.

Wastewater Treatment

The facility has floor drains throughout all areas of the building except for the coolers. All floor drains have a screen to capture any large pieces of waste material. The drain screens are cleaned daily and included with the solid waste bin. The liquid moving through the floor drains go to a 5,000-gallon grease interceptor. The interceptor is designed with an automatic conveyor to transport grease into a 300-gallon dumpster. This dumpster is emptied 1-2 times per week. The remaining wastewater is then discharged through a parshall flume, for flow measurement and sample collection, prior to entering into the City of Missoula's collection system.

EPA Classification of the Industrial User

The facility produces processes raw pork bellies into Bacon. The City of Missoula has determined that this wastestream is subject to its local limits and has permitted the facility as an SIU, subject to the Pretreatment Regulation found in the City of Missoula's ordinance and 40 C.F.R. Part 403.

Summary of Findings

JR Daily's Premium Meats
NPDES ID# MTP000008
September 27, 2023

Pretreatment Inspection Findings	Follow up Action Items
None identified during the facility inspection	N/A

Report Review and Signature		
Drafter Name:	Address/Phone Number	Date
Lisa-kay Prideaux	U.S. EPA Region 8, Montana Operations Office 10 West 15th Street, Suite 3200 Helena, Montana 59626 406-457-5022	10.04.2023
Reviewer Name:	Address/Phone Number	Date
Al Garcia	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202 303-312-6803	10/04/2023
Supervisor Signature/Name	Address/Phone Number	Date
	U.S. EPA Region 8 1595 Wynkoop Street 8WD-CWW Denver, Colorado 80202	10/10/2023
Michael Boeglin	303-312-6250	