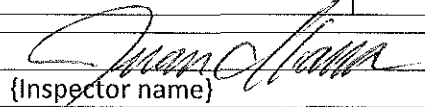
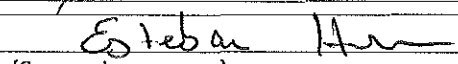


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	03/21/2018		
Media:	Water		
Regulatory Program(s)	NPDES		
Company Name:	Tyson Poultry, Inc.		
Facility Name:	Tyson Poultry, Inc. – Dardanelle Processing Facility		
Facility Physical Location:	1291 North Highway 7 (Plant Entrance: 35.216868, -93.161982)		
(city, state, zip code)	Dardanelle, Arkansas 72834		
Mailing address:	P.O. Box 638		
(city, state, zip code)	Dardanelle, Arkansas 72834		
County/Parish:	Yell County		
Facility Contact:	Lance Martin	Tyson Complex Manager	
	lance.martin@tyson.com		
FRS Number:	N/A		
Identification/Permit Number:	ARR00A055		
Media Number:	N/A		
NAICS:	311615		
SIC:	2015		
Personnel participating in inspection:			
Dave Evans	Tyson	Environmental Manager	479-229-8715
Lance Martin	Tyson	Complex Manager	479-229-8780
Wayne Spencer	Tyson	Wastewater Manager	479-229-8764
Paul Juarez	EPA R-6/6EN-WC	Inspector	214-665-7247
Juan Ibarra	EPA R-6/6EN-WC	Inspector	214-665-8493
EPA Lead Inspector			24 April 2018
Signature/Date	{Inspector name}		Date
Supervisor			5/2/2018
Signature/Date	{Supervisor name}		Date

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Juan Ibarra and Paul Juarez began an unannounced Industrial Storm Water inspection at the Tyson Poultry, Inc. / Dardanelle Processing Facility at 1107 on March 21, 2018. We met with Dave Evans (Tyson Environmental Manager), and Wayne Spencer (Tyson Wastewater Manager) at the Opening Conference. I presented my credentials to the Tyson Managers and informed them that this was an EPA inspection to determine compliance with the facility's ADEQ Industrial Storm Water General Permit and the Clean Water Act. The scope of the inspection was a full compliance evaluation inspection (CEI) and included an evaluation of the facility's physical site conditions and applicable records as required by the ADEQ Industrial Storm Water General Permit. Dave Evans and Wayne Spencer accompanied the EPA inspectors throughout the course of the inspection.

FACILITY DESCRIPTION

The 1.3 MGD Tyson wastewater treatment plant (WWTP) treated wastewaters resulting from the slaughter, cleaning, and processing of poultry (chicken) and boiler blowdown. The processing plant, which operated three shifts per day (five days a week - closed on weekends), had two 8-hr production shifts and one 8-hr sanitation shift. A description of the plant's wastewater treatment system, covered under the Arkansas NPDES discharge permit (AR0036714), can be found in the inspection report (inspection dates of 3/20-21/2018) covering that portion of the facility site review.

The facility production area subject to coverage under the Storm Water Permit, including the processing, materials storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling) and wastewater treatment areas, that discharged industrial storm water thru three storm water outfalls (001, 002 and 004).

Section II - OBSERVATIONS

The facility had implemented, managed and maintained a Storm Water Pollution Prevention Plan (SWPPP) that properly identified all of the areas with potential pollutant sources, had accurate site maps and appropriate best management practices (BMPs). The facility SWPPP was found to be complete and well maintained as an active record of the facility's storm water pollution prevention program.

The storm water team was current, and they were making the required quarterly and annual inspections, as well as taking the required quarterly samples. Additionally, BMPs to minimize the discharge of pollutants were being implemented, including the covering and tank containment at the fueling area, sloping the pavement so as to route contaminated storm water runoff from the poultry transport truck cooling shed to the WWTP, sending the trailer drip pad collection to the offal building at

the WWTP, very good housekeeping and street sweeping, and the documentation of the response activities that followed issues noted in their visual inspection program.

Additionally, the required analyses were being performed as required by the General Permit at the required frequency, and the facility was meeting their benchmark requirements with one exception in November, 2015. The facility determined that this benchmark exceedance for COD at OTFL 002 probably occurred due to crushed berries that fell from a 100' row of densely clustered yaupon trees located adjacent to the OTFL. However, the facility was taking the Oil and Grease sample in a plastic container which violated the container requirement for Oil and Grease sample collection found in 40 CFR 136.3.

Section III – AREAS OF CONCERN

During the Closing Conference which occurred on 3/21/2018, the following areas of concern were discussed with the facility managers:

- 1) The facility was taking the Oil and Grease sample in a plastic container which violated the container requirement for Oil and Grease sample collection found in 40 CFR 136.3. A glass jar is the required sample container for use in the HEM found in Method 1664.

Section IV – FOLLOW UP

None

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – 6 photos taken 3/21/2018

Appendix 1

Photo Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Tyson Poultry, Inc.		
City: Dardanelle	County: Yell	State: Arkansas



Photo File Name: P3210009.JPG

Date of Photo: 03/21/2018

Time of Photo: 1313

Photographer: Juan Ibarra

Description: Looking southwest at storm water OTFL 002, located on the southwest side of the wastewater treatment plant. The yaupon trees that were believed to have been the cause of a COD benchmark exceedance in November, 2015, are seen in the background. Also, a sluice gate was used to control when a discharge would occur.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Tyson Poultry, Inc.		
City: Dardanelle	County: Yell	State: Arkansas



Photo File Name: P3210010.JPG

Date of Photo: 03/21/2018

Time of Photo: 1316

Photographer: Juan Ibarra

Description: Looking west at storm water OTFL 001, located on the northwest side of the wastewater treatment plant. This OTFL was also equipped with a sluice gate.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Tyson Poultry, Inc.		
City: Dardanelle	County: Yell	State: Arkansas



Photo File Name: P3210011.JPG

Date of Photo: 03/21/2018

Time of Photo: 1320

Photographer: Juan Ibarra

Description: Looking south at the storm water bio-retention pond. This vegetated pond would catch an estimated 60% of the storm water generated at the plant site (according to the Tyson staff) that comes from the northwest side of the facility.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Tyson Poultry, Inc.		
City: Dardanelle	County: Yell	State: Arkansas

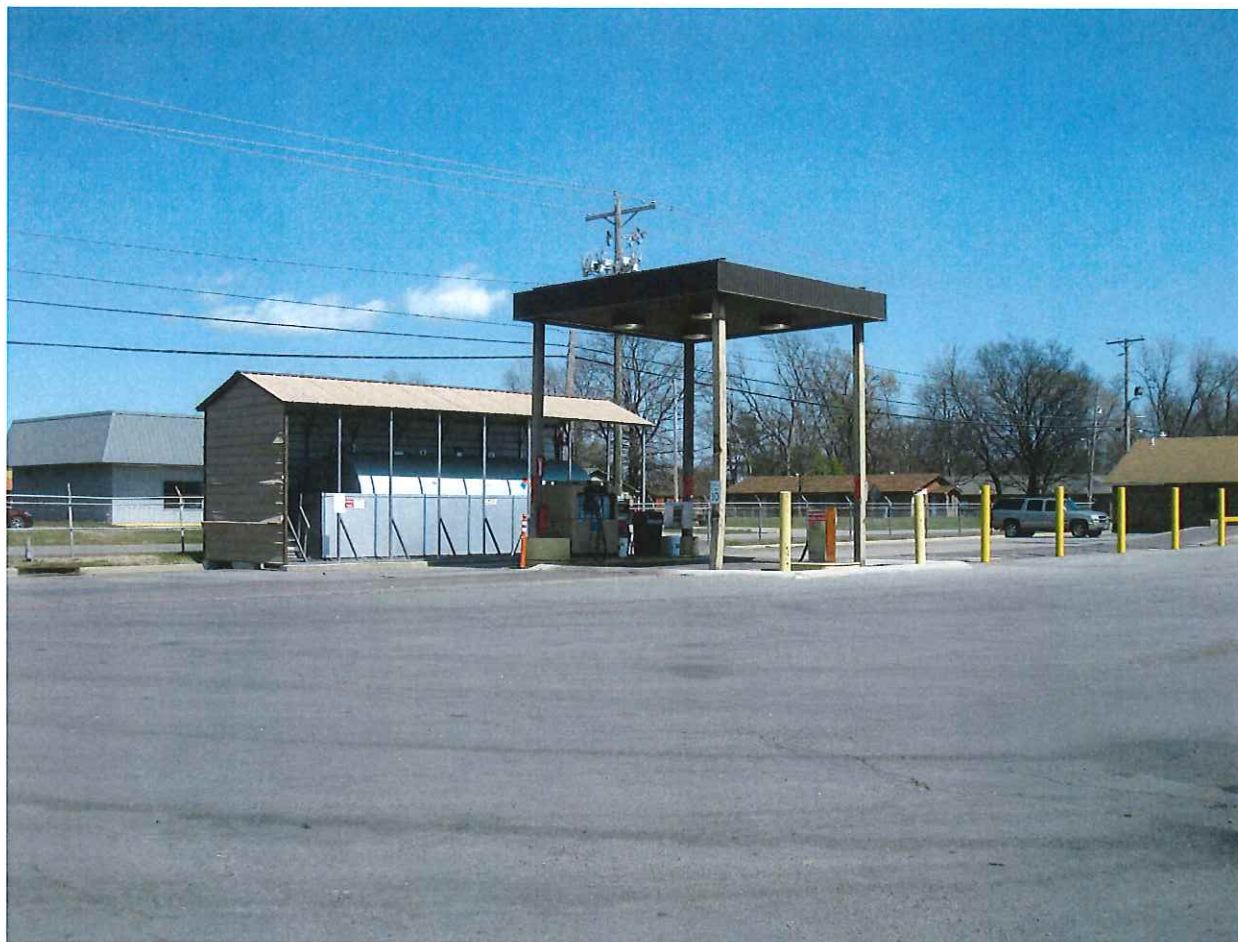


Photo File Name: P3210012.JPG

Date of Photo: 03/21/2018

Time of Photo: 1323

Photographer: Juan Ibarra

Description: Looking northeast at the covered fuel station at the north side of the facility. The fuel pumps were covered and had concrete curbing, and the above ground fuel tank had secondary containment (with no drain plug discharge potential) and a roof covering.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Tyson Poultry, Inc.		
City: Dardanelle	County: Yell	State: Arkansas



Photo File Name: P3210013.JPG

Date of Photo: 03/21/2018

Time of Photo: 1323

Photographer: Juan Ibarra

Description: Looking east at the site conditions at the truck and trailer area at the northeast area of the plant grounds. Note the cleanliness and good housekeeping that was representative of the plant site. No vehicle oil spills were noted during the inspection.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Tyson Poultry, Inc.		
City: Dardanelle	County: Yell	State: Arkansas



Photo File Name: P3210014.JPG

Date of Photo: 03/21/2018

Time of Photo: 1340

Photographer: Juan Ibarra

Description: Looking east at storm water OTFL 004 (below the yellow railing). Storm water from this OTFL enters the City of Dardanelle storm sewer system, and commingles with the WWTP effluent before discharging at the Arkansas River.