

Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT

Inspection Date(s):	07/16/2024		
Media:	Water		
Regulatory Program(s)	Clean Water Act		
Company Name:	Pilgrim Pride Corp		
Facility Name:	Pilgrim Pride Corp -Natchitoches Processing Plant		
Facility Physical Location:	7088 HWY 1 Bypass		
(city, state, zip code)	Natchitoches, LA 71458		
Mailing address:	7088 HWY 1 Bypass		
(city, state, zip code)	Natchitoches, LA 71458		
County/Parish:	Natchitoches County		
Facility Contact:	Mark Haecker	Plant Manager	
	318-356-6300		
FRS Number:			
Identification/Permit Number:	LA0054178		
Media Number:	AI 27951		
NAICS:			
SIC:	5144		
Personnel participating in inspection:			
Michael Williams	EPA/ 6EN-WMH	Inspector	281-983-2150
Hugh Creech Jr.	Pilgrims Pride	Environmental Manager	318-356-6313
Chriss Pickett	Pilgrams Pride	Wastewater Plant Manager	318-356-6300
EPA Lead Inspector Signature/Date	 Digitally signed by MICHAEL WILLIAMS Date: 2024.09.17 14:33:48 -05'00'		
	Michael D. Williams		Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2024.09.17 16:05:23 -05'00'		
	Roberto Bernier		Date

Section I - Introduction

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Michael Williams, arrived at the Pilgram's Pride Corporation Natchitoches Processing Plant at 9:25 am on July 16, 2024, for an unannounced NPDES wastewater treatment plant inspection. During the opening conference, I met with Mark Haecker, Plant Manager. Mr. Haecker was informed that this was an EPA lead compliance evaluation inspection to determine compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act. The scope of the inspection was with permit LA0054178 and facility operations and maintenance under the Clean Water Act. The inspection was conducted under the authority of the NPDES permit program, in accordance with the Federal CWA.

The information presented in this report is based on the materials and information supplied by the Pilgram's Pride Corporation representatives, observations made during the inspection, and records or reports maintained by the permittee.

FACILITY DESCRIPTION

The Pilgram's Pride Corporation Natchitoches Plant processes live broiler chickens that are delivered to the Pilgrim's Facility via truck and are slaughtered, eviscerated, and processed into various fresh and frozen chicken meat products. Some products may also go through a marination process. Chicken is packed in cases and shipped to customers for final preparation and consumption. Viscera, feathers, meat trimmings, bone, and blood are transported to an off-site rendering facility for production of protein byproducts for animal feed. Typically, two production shifts and one sanitation shift are performed each processing day. Poultry processing operations are typically conducted at the Facility five to six days a week.

Significant water is used in the poultry processing operations at the Facility, and this potable water is provided by the City of Natchitoches, Louisiana Municipal Water Supply. Process wastewater from facility operations and storm water runoff from live animal receiving areas and by-product handling areas is treated onsite in the wastewater treatment system.

The wastewater treatment system is a 2 million gallons per day (MGD) capacity mechanical treatment facility. The process begins with an initial screening stage, which removes large debris and solid particles, and feathers from the influent. After screening, the wastewater is directed into an enclosed settling lagoon. The lagoon allows for further settling of solids before the flow is routed to the dissolved air flotation (DAF) unit.

In the DAF unit, fine suspended solids are separated from the water using microscopic air bubbles, which float the particles to the surface for removal. Following this clarification step, the treated water flows into an anoxic basin. The anoxic basin creates a low-oxygen environment to promote denitrification, reducing the levels of nitrogen compounds.

Next, the water moves into the aeration basin, where oxygen is introduced to encourage the growth of aerobic bacteria. These microorganisms break down organic pollutants in the wastewater. From the aeration basin, the water is then directed into dual clarifiers, which allow any remaining solids to settle out.

The clarified effluent undergoes disinfection using an ultraviolet (UV) system, which neutralizes pathogens before the treated water is discharged to Outfall 001.

Section II- Observations

This inspection revealed the following observations:

- The facility uses marinades for various products, which contain high levels of salt and sodium tripolyphosphates. These ingredients significantly increase the salinity and conductivity of the influent waste stream entering the wastewater treatment plant.
- Pilgrim's Pride has repeatedly failed to meet the Whole Effluent Toxicity (WET) limits for Ceriodaphnia Dubia, a critical indicator of water quality and aquatic life toxicity. Over the twelve quarterly monitoring periods between the fourth quarter of 2021 and the second quarter of 2024, the company has failed the WET limit test in eight instances. These recurring violations highlight a persistent issue with the toxicity levels in their effluent discharge, which poses a threat to the local aquatic ecosystem.

Section III- Areas of Concerns

This inspection revealed the following areas of concerns:

- Pilgrim's Pride has attempted to improve their operations by dredging their lagoon and updating their best management practices to prevent marinades from entering the wastewater treatment plant. Despite these efforts, the facility still fails to meet the WET limit for Ceriodaphnia Dubia on a consistent basis and has been in significant noncompliance.

Section IV – LIST OF APPENDICES

- Appendix A – Photos
- Appendix B – Whole Toxicity Test Results

Appendix A

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Pilgram's Pride		
City: Natchitoches	County/Parish: Natchitoches	State: LA



Screening



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Pilgram's Pride		
City: Natchitoches	County/Parish: Natchitoches	State: LA



Cover Sedimentation Basin



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Pilgram's Pride		
City: Natchitoches	County/Parish: Natchitoches	State: LA



DAF Unit



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Pilgram's Pride		
City: Natchitoches	County/Parish: Natchitoches	State: LA



Aeration Basin

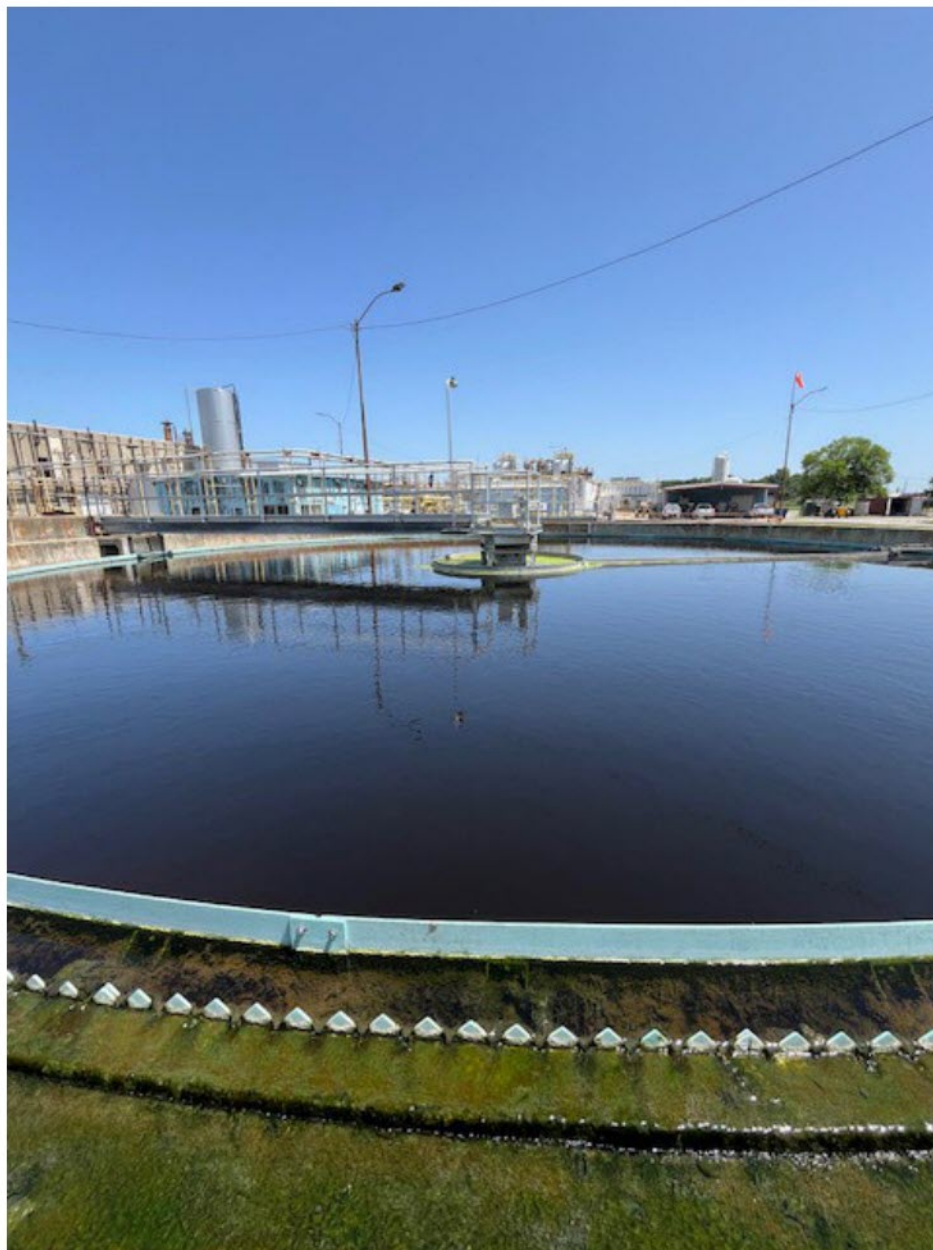


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Pilgram's Pride		
City: Natchitoches	County/Parish: Natchitoches	State: LA



Clarifier

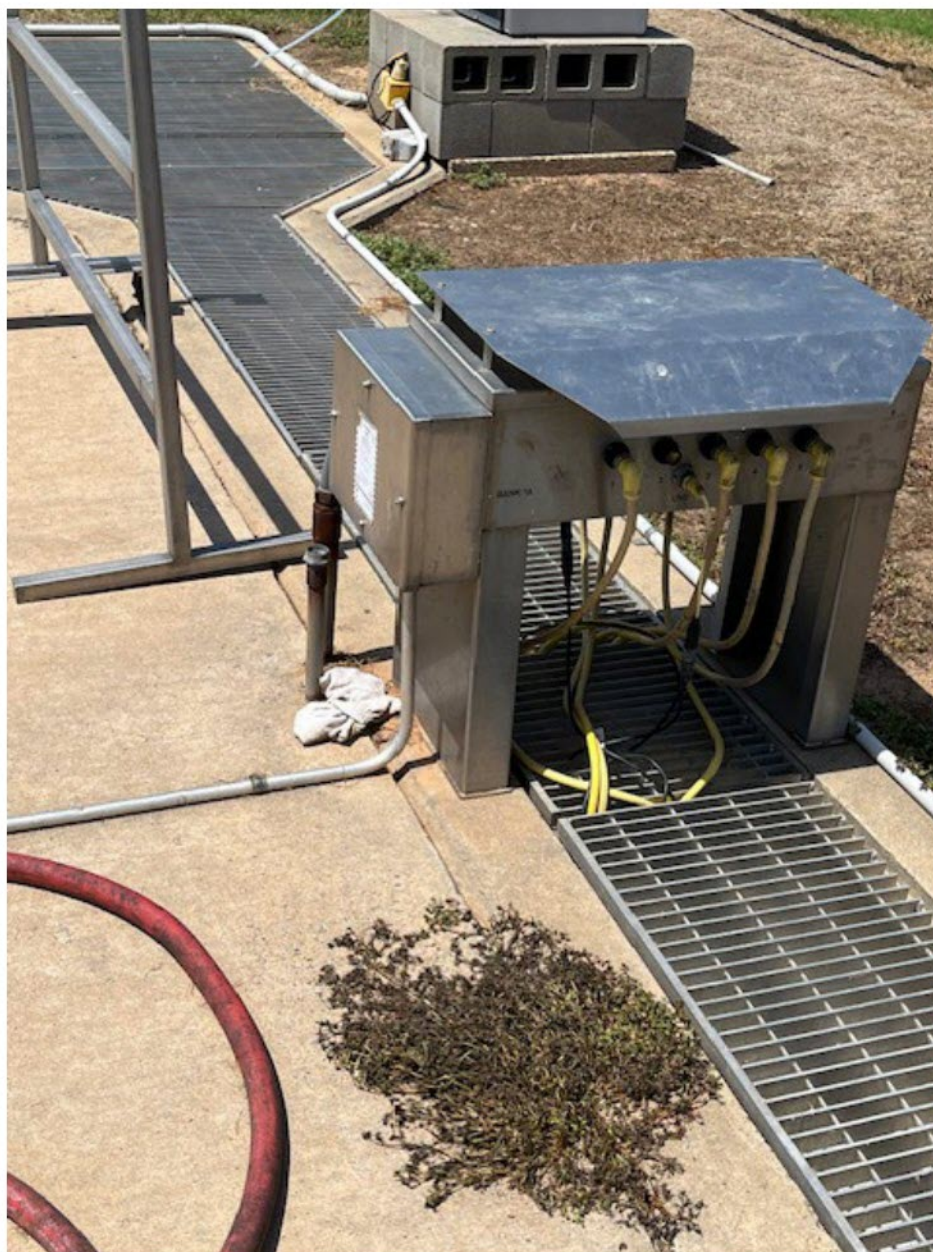


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Pilgram's Pride		
City: Natchitoches	County/Parish: Natchitoches	State: LA



UV System

Appendix B
Pilgrims Pride Whole Effluent Toxicity Test Results

Appendix B
Pilgrims Pride Whole Effluent Toxicity Test Results

Appendix B
Pilgrims Pride Whole Effluent Toxicity Test Results

Summary of Results for Whole Effluent Toxicity Testing for Pilgrim's Pride, Natchitoches, LA									
<u>IWC/CRITICAL DILUTION</u>	94%/96%	96% December 2019							
Cd= Ceriodaphnia dubia; Pp = Pimephales promelas (Fathead minnow)									
	NOEC	NOEC	IC25			NOEC	NOEC	IC25	
<u>Month</u>	<u>Cd Survival</u>	<u>Cd Reproduction</u>	<u>Cd Reproduction</u>	<u>Pass/Fail</u>	<u>Comments</u>	<u>Pp Survival</u>	<u>Pp Biomass</u>	<u>Pp Biomass</u>	<u>Pass/Fail</u>
JAN 17									
FEB									
MAR	94	0		Fail		94	94		Pass
APR									
MAY									
JUN E	94	0		Fail		94	94		Pass
JULY									
AUG									
SEPT	94	40		Fail		94	94		Pass
OCT	94	40		Fail					
NOV	94	53		Fail		94	94		Pass
DEC	94	40		Fail					
JAN 18	94	0		Fail		94	94		Pass
FEB	94	71		Fail					
MAR	94	53		Fail					
APR	94	71		Fail					
MAY									
JUN	71	53		Fail		94	94		Pass
JULY	94	94		Pass					
AUG	94	94		Pass		94	94		Pass
SEPT	0	0		Fail		94	94		Pass
OCT	94	0		Fail		94	94		Pass
NOV	94	71		Fail					
DEC	94	94		Pass					
JAN 19	94	71	54.77	FAIL		94	94		PASS
FEB	94	0	10.85	FAIL					
MAR	94	94	94	PASS					
APR	94	71	64.57	FAIL					
MAY	94	53	46.91	FAIL		94	94		PASS

Appendix B
Pilgrims Pride Whole Effluent Toxicity Test Results

DEC	96	54	82	Fail		96	96	>96	Pass
JAN 22	72	0	10	Fail			TEST INVALID		
FEB	96	0	14	Fail		96	96	>96	Pass
MAR	96	54	59	Fail					
APR	96	96	>96	Pass					
MAY	96	54	56	Fail		96	96	>96	Pass
JUNE	96	96	93	Pass					
JULY	96	0	44	Fail		96	72	92	Fail
AUG	96	96	91	Pass		96	96	>96	Pass
SEPT	96	30	36	Fail		96	96	>96	Pass
OCT	96	96	>96	Pass	CV% in 96% = 52.83	96	96	>96	Pass
NOV	96	96	>96	Pass	PMSD = 51.92%				
DEC	96	96	>96	Pass					
JAN '23	72	0	20	Fail	Sheen noted; meat agar fell apart	96	96	>96	Pass
FEB	72	40	50	Fail	Sheen noted				
MAR	96	54	55	Fail	Sheen noted				
APR	96	72	20.49	Fail	No Sheen	96	96	>96	Pass
MAY	96	96	66.86	Pass	No Sheen				
JUNE	96	96	>96	Pass	No Sheen				
JULY	96	96	>96	Pass	Sheen noted PMSD 53.99	96	96	>96	Pass
AUG									
SEPT									
OCT									
NOV									
DEC	96	96	>96	Pass	Sheen noted	96	96	>96	Pass
JAN '24									
FEB									
MAR	96	54	54.94	Fail	Sheen noted	96	96	>96	Pass

Appendix B
Pilgrims Pride Whole Effluent Toxicity Test Results

APR	96	96	>96	Pass		96	96	>96	Pass
MAY	96	96	>96	Pass					
JUN E	72	72	66.43	Fail	No Sheen				