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Subject: Intent to Present Technical Testimony,
Regarding: Renewal of ground water discharge permit DP-236
Roswell, New Mexico, No. GWB 13-05

9 October, 2013

NMED Hearing Clerk, Sally Worthington
Room S-2103, 1190 St. Francis Drive
P.O. 5469, Santa Fe, New Mexico 87502

Dear Ms. Worthington,

It is my intention to present testimony on October 22, against the issuance of a permit to Valley Meat Company. I am attaching my testimony and items of evidence. I am an Electrical Engineer with over forty years of experience in industrial systems. I expect to need about 20 minutes baring questions.

The EWA is an umbrella organization with approximately 300 member organizations involved in equine welfare. Among other things, we serve as a central research organization and data repository. We study all aspects of equine welfare, including slaughter. Most recently, I co-authored *An Analysis of Factors Responsible for the Horse Industry Decline,* published in the peer reviewed *Kentucky Journal of Equine, Agricultural and Natural Resources Law*.

We have studied the environmental/waste discharge records of three horse slaughter facilities; Dallas Crown (TX), Cavel (IL), and Natural Valley Farms (SK). The first two used municipal sewer systems to discharge their waste, and as a result we were able to obtain the record of their violations. The third was in a remote area of Saskatchewan, Canada and it attempted to use an evaporation lagoon much like Valley Meats proposes.

Kindest Regards,

John Holland, President
Equine Welfare Alliance, Inc.
PO Box 386,
Shawsville, VA 24162
540.268.5693

TESTIMONY:

My name is John Holland, and I am President of the Equine Welfare Alliance. My position is completely voluntary and unpaid. By profession, I am an Electrical Engineer with over 40 years experience in industrial systems, including nuclear waste monitoring. I am the author of three books and have been published widely on issues of equine welfare and horse slaughter.

The Equine Welfare Alliance collects data on all aspects of the horse industry and makes it available to our members, the press and government officials. Among other things, we have collected the data on environmental issues surrounding horse slaughter plants.

The record shows that while all forms of slaughter have their environmental problems, equine slaughter is disproportionally fraught with disposal issues. There are several apparent reasons for this, including:

- There is no established market for the byproducts of equine slaughter. While the cattle slaughter industry has long boasted it uses everything but the “moo”, this cannot be said for horse slaughter. The main reason for this is that horses are not raised as food animals, and so their blood, tissues and waste often contain substances that make it inappropriate for products such as “blood meal”.

- The systems designed to pre-treat the waste from cattle and other meat animals have failed dramatically in treating the blood and waste of equines.

To understand the gravity of these issues, consider the case of the Cavel horse slaughter facility in DeKalb, Illinois. On Easter Sunday 2002, the plant burned to the ground from unknown causes (arson was not indicated as sometimes claimed). The plant and its waste treatment system were rebuilt to the state of the art standards and began operations in the summer of 2004.

In 2007, Illinois enacted an amendment to the Illinois Horse Meat Act that made slaughter of horses for human consumption illegal. This forced the closure of the Cavel plant in September of 2007. From its reopening to its closure, the plant was never in compliance with its sewage discharge for a single month. The attached records reflect the failure of the treatment systems.

As can be seen, the DeKalb sanitary district found the BOD (Biochemical Oxygen Demand) for their waste stream was out of limits constantly the first year. Over the next two years, the tests became more frequent but the results were always unacceptable in many categories. (brief discussion of attached files).

It is useful to view the following image that appeared in the local newspaper the Daily Chronicle. It shows the waste treatment tank (referred to in the industry as the “bug” tank) foaming over onto the ground. The reason for such dramatic failure is undoubtedly the presence of antibiotics that destroy the bacteria used to digest the solids.

The story of Dallas Crown in Kaufman, Texas is exactly the same. The town attempted to bring the plant into compliance because its discharge threatened to overwhelm its municipal treatment plant. The result was a long stream of violations and fines. The plant refused to pay the fines and elected to demand a separate jury trial on each infraction. The court costs were beyond the budget the town could afford. On March 10, 2006, the Kaufman Zoning Commission Board of Adjustments ordered the plant closed without dissent, but the plant delayed the order with litigation and the plant was finally closed in 2007 under 1949 state law. (presentation of discharge violations from just the first nine months of 2004).

Following the closing of Cavel, its parent corporation moved its operation to the Natural Valley Farms slaughter plant in Saskatchewan, Canada. That plant attempted to use a lagoon system similar to that proposed by Valley Meats. The lagoon soon overflowed, and investigators with the Canadian Horse Defense Coalition (CHDC) documented a tanker truck leaving the plant and discharging its contents next to a local river (presentation of image from video).

In addition, the plant could find no secondary market for its solid waste. An investigator with the CHDC documented the plant spreading tons of solid waste in a shallow pit and covering it with a bull dozer (presentation of image of gut pile). A director of the plant, Henry Skjerven, claimed on an internet radio program that the ground had been yielded sterile by this process. The recording of this and other revelations made by Mr. Skjerven are available on-line as is the full video of the truck discharging its waste.

In conclusion, there is a strong likelihood that the proposed Valley Meats plant will do no better than these operations. In fact, these plants had strong financial backing from their Belgian owners who distributed the meat in the European market.

Moreover, the condition of the Valley Meats plant when it announced its plans to slaughter horses is ample evidence that the management is not capable of performing even cattle slaughter in a responsible manner. Approval of this permit will have terrible repercussions for the local environment and water resources.

EXHIBIT 1 – DeKalb Sanitary District records for Cavel International.

DEKALB SANITARY DISTRICT
PUBLIC NOTICE OF SIGNIFICANT NON-COMPLIANCE

Listed below are the significant industrial wastewater discharge violators of 40 CFR Part 403 (General Pretreatment Regulations) for the calendar year 2004:
Industry Name: Cavel International, Inc. Address: 108 Harvestore Drive, DeKalb, IL 60115
Violation(s):
(1) BOD exceeded daily maximum (3 times) and monthly average for July.
(2) BOD exceeded daily maximum (2 times) and monthly average for August.
(3) BOD exceeded monthly average for September.
(4) BOD exceeded daily maximum (1 time) and monthly average for October.
(5) BOD exceeded daily maximum (1 time) and monthly average for November
(6) BOD exceeded monthly average for December.
Actions Taken: (1) Notice of Violation 8/5/04 (2) Notice of Violation 9/4/04 (3) Notice of Violation 10/6/04 (4) Notice of Violation 11/3/04 (5) Notice of Violation 11/29/04 (6) Notice of Violation 1/4/05. (7) Administrative Order including $500.00 fine 3/17/05.

RW $500.00 4-8-05

STATE OF ILLINOIS
IN THE DEKALB SANITARY DISTRICT, A MUNICIPAL CORPORATION
COUNTY OF DEKALB

IN RE THE MATTER OF:	)	
	)	
CAVEL INTERNATIONAL, INC.	)	No.
	)	
Permittee.	)	
	)	

ADMINISTRATIVE ORDER

THIS MATTER coming on before the Approval Authority, the Board of Trustees of the DeKalb Sanitary District, acting by and through its duly authorized representative, the District Manager, upon a report by staff of a reoccurring violation of discharge limits set forth in the Permittee's Discharge Permit which has been found by staff not to pose a harm to the Publicly Owned Treatment Works ("POTW") or the environment,

THE FOLLOWING FINDINGS ARE HEREBY MADE:

1. That Industrial User Permit No. 130 was duly issued to Cavel International, Inc. and was effective on September 1, 2000 and at all times subsequent thereto and prior to the date of this Order.
2. That said Industrial User Permit was issued in accordance with Ordinance No. 259, Section 5C. and imposed at all times relevant herein as set forth in Part 1 thereof, effluent limitations consistent with Ordinance 259 and/or State and Federal environmental protection laws and regulations.
3. That said Industrial User Permit establishes a monthly average effluent limitation for BOD of 500 mg/liter and a Daily Maximum of 2000 mg/liter.

4. That during the last six months of calendar 2004, Cavel International exceeded the established monthly average for BOD of 500 mg/liter and the Daily Maximum of 2000 mg/liter as follows:

    a. BOD exceeded daily maximum (3 times) and monthly average for July
    b. BOD exceeded daily maximum (twice) and monthly average for August
    c. BOD exceeded monthly average for September
    d. BOD exceeded daily maximum (once) and monthly average for October
    e. BOD exceeded daily maximum (once) and monthly average for November
    f. BOD exceeded monthly average for December.

5. Therefore, Cavel International, Inc. is in "significant" non-compliance for the above period as defined in Part 5, Paragraph 12.A of Permit 130.

NOW, THEREFORE, under the authority granted in Ordinance 259, Section 5E.1., IT IS HEREBY ORDERED AS FOLLOWS:

A. A fine in the amount of $500.00 is being imposed upon the Permittee, Cavel International, Inc.

B. That said fine is due and payable immediately.

C. The penalty herein imposed shall not be construed to be the exclusive sanction for said violation(s) or for any future such violations and the Approval Authority hereby reserves the right to take such future action as may be deemed necessary or advisable.

D. The Permittee shall have the right to appeal from this Order as set forth in Ordinance 259, section 5D.12.

ENTERED this 17th day of MARCH, 2005.

BOARD OF TRUSTEES OF
DEKALB SANITARY DISTRICT

By: Michael Zemi
District Manager

DEKALB SANITARY DISTRICT
PUBLIC NOTICE OF SIGNIFICANT NON-COMPLIANCE

Listed below are the significant industrial wastewater discharge violators of 40 CFR Part 403 (General Pretreatment Regulations) for the calendar year 2005:
Industry Name: Cavel International, Inc. Address: 108 Harvestore Drive, DeKalb, IL 60115
Violations:

1) BOD exceeded the monthly average in January.
2) BOD exceeded the daily maximum twice and the monthly average in February.
3) BOD and TSS exceeded the monthly average and there was one pH violation in March.
4) BOD exceeded the daily maximum 3 times and the monthly average and TSS exceeded the daily maximum once and the monthly average in April.
5) BOD exceeded the daily maximum twice and the monthly average, TSS exceeded the monthly average, and Ammonia exceeded the daily maximum once in May.
6) BOD exceeded the daily maximum once and the monthly average and Ammonia exceeded the daily maximum twice and the monthly average in June.
7) Ammonia exceeded the daily maximum 3 times and the monthly average in July.
8) BOD and TSS exceeded the monthly average and Ammonia exceeded the daily maximum 3 times and the monthly average in August.
9) BOD exceeded the monthly average and Ammonia exceeded the daily maximum 4 times and the monthly average in September.
10) Ammonia exceeded the daily maximum 4 times and the monthly average in October.
11) Ammonia exceeded the daily maximum 3 times and the monthly average and there were 2 pH violations in November.

Actions Taken:

1) Notice of Violation 2/8/2005
2) Notice of Violation 2/28/2005
3) Notice of Violation 4/5/2005
4) Notice of Violation 5/2/2005
5) Notice of Violation 5/31/2005
6) Notice of Violation 7/5/2005
7) Notice of Violation 8/2/2005
8) Notice of Violation 9/6/2005
9) Notice of Violation 10/3/2005
10) Notice of Violation 11/1/2005
11) Notice of Violation 12/5/2005.

Penalties:

1) Administrative Order dated 3/17/2005: A fine of $500.00 (for calendar year 2004 violations.)
2) Administrative Order dated 1/30/2006: A fine of $500.00 for each month in which any monthly average limitation was exceeded (11 months during 2005 totaling $5,500.00.)

Cavel International, Inc. 108 Harvestore Dr. DeKalb, IL 60115

2006 compliance/performance sampling results

N.O.V. RESPONSE

Permit Limits:	BOD mg/l	TSS mg/l	NH3 mg/l	pH S.U.
Daily Maximum	2000	2000	24	5.5-9.5
Monthly Average	500	400	24	

Daily Violations =	47
Monthly Violations=	21
Total :	68

Sample (grab) Date	Time(am)	BOD	TSS	NH3	pH
1/4/06	8:20	0	30	14.1	7.06
1/11/06	8:05	1200	280	52.5	7.26
1/18/06	8:20	1710	560	29.7	7.37
1/25/06	8:15	570	340	89.7	6.78
Mo. Ave.		**870**	**302.5**	**46.5**	
2/2/06	8:15	0	110	25.1	6.68
2/8/06	8:00	1230	250	6.24	4.14
2/15/06	8:20	810	340	43.7	6.48
2/22/06	8:15	1020	120	4.84	7.52
Mo. Ave.		**765**	**205**	**20**	
3/1/06	8:10	1500	540	9.27	8.06
3/8/06	8:00	1650	230	7.23	3.24
3/15/06	8:20	990	210	62.8	9.4
3/22/06	8:15	930	230	36.9	8.93
3/29/06	8:30	960	90	68.4	9.3
Mo. Ave.		**1206**	**260**	**36.9**	
4/5/06	8:40	1050	50	23.7	9.13
4/12/06	8:50	570	160	36.4	11.78
4/19/06	8:45	120	88	29.9	7.31
4/26/06	8:00	810	130	86	8.53
Mo. Ave.		**637.5**	**107**	**44**	
5/3/06	8:20	1110	150	28	9.4
5/10/06	8:20	1320	130	74.3	9.5
5/17/06	8:45	903	330	19.6	5.65
5/24/06	8:40	390	140	28.3	9.9
5/31/06	8:45	0	150	30.9	7.62
Mo. Ave.		**744.6**	**180**	**36.2**	
6/7/06	8:15	1920	730	98.4	6.1
6/14/06	8:25	1290	108	40.1	7.4
6/21/06	8:20	1080	110	63.2	7.53
6/28/06	8:30	2340	250	16.1	7.97
Mo. Ave.		**1658**	**299.5**	**54.5**	

Sample (grab) Date	Time(am)	BOD	TSS	NH3	pH
7/5/06	8:30	421.5	120	108	6.33
7/12/06	8:20	273	140	32	4.68
7/19/06	8:30	871	210	49	8.21
7/26/06	8:45	30	70	24	8.21
Mo. Ave.		**398.875**	**135**	**53.25**	
8/2/06	8:20	30	140	36	8.59
8/9/06	8:30	840	90	25	8.12
8/16/06	8:15	0	110	23	8.65
8/23/06	8:50	0	150	89	7.13
8/30/06	8:25	60	260	27	7.3
Mo. Ave.		**186**	**150**	**40**	
9/6/06	8:50	60	220	16.4	6.92
9/13/06	8:30	810	400	40.1	3.61
9/20/06	8:20	750	200	40.2	9.96
9/27/06	8:15	390	200	50.5	7.05
Mo. Ave.		**502.5**	**255**	**36.8**	
10/4/06	8:15	90	210	66	7.27
10/11/06	8:20	2220	440	78.4	9.42
10/18/06	8:40	1290	320	86.8	7.16
10/25/06	8:20	270	110	30	7.71
Mo. Ave.		**967.5**	**270**	**65.3**	
11/1/06	8:30	1080	280	106	5.58
11/8/06	8:50	900	284	58.7	7.15
11/15/06	8:10	1680	210	27.6	7.57
11/22/06	8:10	390	340	20	7.35
11/29/06	8:45	1230	250	14.8	7.63
Mo. Ave.		**1056**	**272.8**	**45.42**	
12/5/06	8:15	210	156	16.9	5.5
12/13/06	8:30	1200	110	34.8	7.29
12/20/06	9:50	1200	90	32.2	7.26
12/27/06	8:10	600	180	31	6.96
Mo. Ave.		**802.5**	**134**	**28.78**	

Figure 1 - Pretreatment tank at Cavel (Mar. 07)

Exhibit 2 – Discharge records for Dallas Crown (9 month period)

Date Collected	Account/Sample Collected	Ammonia as Nitrogen	COD	CBOD	BOD	BODS	TSS	Oil & Grease	pH	Violations
1/1/2004	253/Effluent Composite	81			2000		850		7.1	
1/6/2004	253/Effluent Composite	92			860		450		6.6	
1/6/2004	13/DC Plant Discharge Grab Monthly				710		160	8.5	6.6	
1/13/2004	253/Effluent Composite	79			1800		720		7.2	
1/9/2004	253/Effluent Composite	41			640		390		6.7	
1/20/2004	253/Effluent Composite	64			2000		900		7.2	
1/23/2004	253/Effluent Composite	49			**2700**		450		7.4	BOD
1/30/2004	253/Effluent Composite	15			740		400		7.5	
2/3/2004	253/Effluent Composite	37			**2600**		**1600**		7.3	BOD, TSS
2/3/2004	13/DC Plant Discharge Grab Monthly				750		170	19	7.3	
2/6/2004	253/Effluent Composite	74			**2600**		890		7.4	BOD
2/10/2004	253/Effluent Composite	58			1700		910		7.2	
2/13/2004	253/Effluent Composite	54			**2300**		700		7.4	BOD
2/17/2004	253/Effluent Composite	62			**3100**		660		7.4	BOD
2/24/2004	253/Effluent Composite	79			**3000**		1300		7.1	BOD
2/27/2004	253/Effluent Composite	78			**2300**		1400		6.9	BOD
3/2/2004	13/DC Plant Discharge Grab Monthly				930		180	26	6.8	
3/5/2004	253/Effluent Composite	64			1400		820		7.1	
3/9/2004	253/Effluent Composite	130			**3300**		1200		7.0	BOD
3/12/2004	253/Effluent Composite	46			1300		810		6.7	
3/16/2004	253/Effluent Composite	61			**2600**		260		7.0	BOD
3/19/2004	253/Effluent Composite	120			**3000**		1000		7.1	BOD
3/23/2004	253/Effluent Composite	130			1900		310		6.5	
3/26/2004	253/Effluent Composite	150			**3000**		1100		7.0	BOD
3/30/2004	253/Effluent Composite	220			**2400**		1200		6.9	BOD
4/2/2004	253/Effluent Composite	66			1300	900	350		7.3	
4/6/2004	13/DC Plant Discharge Grab Monthly				**4000**		**4300**	32	6.8	BOD, TSS
4/6/2004	253/Effluent Composite	140			1500	1900	70		6.8	
4/9/2004	253/Effluent Composite	110			1700	1200	1000		7.3	
4/13/2004	253/Effluent Composite	140			**3200**	1800	**5300**		6.9	BOD, TSS
4/16/2004	253/Effluent Composite	86			1200	990	460		7.1	
4/20/2004	253/Effluent Composite	170			1600	1300	130		6.6	
4/23/2004	253/Effluent Composite	180			1600	1200	580		7.1	
4/27/2004	253/Effluent Composite	75			1700	1400	230		7.0	
4/27/2004	13/Plant Effluent Composite Daily	72		1400			190	17	6.9	
4/28/2004	13/Plant Effluent Composite Daily	150		2000			430	16	7.1	
4/29/2004	13/Plant Effluent Composite Daily							120	7.3	
4/30/2004	253/Effluent Composite	200			2000	1400	1300		7.2	
4/30/2004	13/Plant Effluent Composite Daily	200		2000			1300	20	7.2	
5/1/2004	13/Plant Effluent Composite Daily	230		**2800**			**2000**	21	6.7	BOD, TSS
5/4/2004	13/DC Plant Discharge Grab Monthly				1100		380	29	6.8	

5/4/2004	253/Effluent Composite	120			**7300**	1400	**6300**		6.6	BOD, TSS
5/4/2004	13/Plant Effluent Composite Daily	130		**7600**			**7200**	20	6.6	CBOD,TSS
5/5/2004	13/Plant Effluent Composite Daily	58		310			170	12	6.9	
5/6/2004	13/Plant Effluent Composite Daily	150		910			560	240	7.1	
5/7/2004	13/Plant Effluent Composite Daily	100		1400			960	9.4	7.2	
5/8/2004	13/Plant Effluent Composite Daily	170		**4900**			**6700**	160	7.0	CBOD, TSS
5/11/2004	13/Plant Effluent Composite Daily	230		**7300**			**9200**	54	6.7	CBOD, TSS
5/12/2004	13/Plant Effluent Composite Daily	120		1400			310	24	6.9	
5/13/2004	13/Plant Effluent Composite Daily	79		820			1000	16	7.2	

Note: Total v

Date Collected	Account/Sample Collected	Ammonia as Nitrogen	COD	CBOD	BOD	BODS	TSS	Oil & Grease	pH	Violations
5/14/2004	13/Plant Effluent Composite Daily	150			3600		**4300**	350	7.1	BOD, TSS
5/15/2004	13/Plant Effluent Composite Daily	180		1300			380	12	6.8	
5/18/2004	13/Plant Effluent Composite Daily	230			8000		**6800**	390	5.9	BOD, TSS
5/19/2004	13/Plant Effluent Composite Daily	73		600			94	7.9	6.9	
5/20/2004	13/Plant Effluent Composite Daily	370			**8000**		**8500**	120	7.0	BOD, TSS
5/21/2004	13/Plant Effluent Composite Daily	270			**2500**		230	7.7	6.9	BOD
5/22/2004	13/Plant Effluent Composite Daily	210			1600		1100	8.5	7.1	
5/25/2004	13/Plant Effluent Composite Daily	300			**5500**		**5700**	22	6.1	BOD, TSS
5/26/2004	13/Plant Effluent Composite Daily	140			580		1000	140	7.0	
5/27/2004	13/Plant Effluent Composite Daily	71			370		67	160	7.0	
5/28/2004	13/Plant Effluent Composite Daily	140			1700		330	11	6.6	
5/29/2004	13/Plant Effluent Composite Daily	170			**3000**		**1800**	6.4	6.9	BOD, TSS
6/1/2004	13/Plant Effluent Composite Daily	180			**2300**		1200	81	6.6	BOD
6/1/2004	13/DC Plant Discharge Grab Monthly				**3900**		**4200**	66	6.6	BOD, TSS
6/2/2004	13/Plant Effluent Composite Daily	150			1500		510	7.9	7.0	
6/3/2004	13/Plant Effluent Composite Daily	240			**3200**		**2000**	260	6.9	BOD, TSS
6/4/2004	13/Plant Effluent Composite Daily	150			**3300**		570	12	7.0	BOD
6/5/2004	13/Plant Effluent Composite Daily	120			1600		880	52	7.2	
6/8/2004	13/Plant Effluent Composite Daily	230			1400		910	31	7.2	
6/9/2004	13/Plant Effluent Composite Daily	200			**8448**		660	25	6.9	BOD
6/10/2004	13/Plant Effluent Composite Daily	100			1300		400	54	6.9	
6/11/2004	13/Plant Effluent Composite Daily	170			**2600**		230	20	7.0	BOD
6/12/2004	13/Plant Effluent Composite Daily	120			840		**1900**	110	7.3	TSS
6/15/2004	13/Plant Effluent Composite Daily	35			880		240	25	7.6	
6/16/2004	13/Plant Effluent Composite Daily	170			####		**1800**	31	7.4	BOD, TSS
6/17/2004	13/Plant Effluent Composite Daily	150			####		720	160	6.5	BOD
6/18/2004	13/Plant Effluent Composite Daily	250			####		**2500**	15	7.7	BOD, TSS
6/19/2004	13/Plant Effluent Composite Daily	150			2000		1500	11	7.6	
6/22/2004	13/Plant Effluent Composite Daily	200			**5600**		1200	97	7.4	BOD
6/23/2004	13/Plant Effluent Composite Daily	230			####		1400	38	7.8	BOD
6/24/2004	13/Plant Effluent Composite Daily	290			####		1100	87	7.3	BOD
6/25/2004	13/Plant Effluent Composite Daily	270			**2800**		**2800**	55	7.5	BOD, TSS

6/26/2004	13/Plant Effluent Composite Daily	100			670		710	25	7.1	
6/29/2004	13/Plant Effluent Composite Daily	100			1600		490	48	7.0	
6/30/2004	13/Plant Effluent Composite Daily	120			####		**2200**	79	7.1	BOD, TSS
7/1/2004	13/Plant Effluent Composite Daily	180			1400		**1600**	48	6.8	TSS
7/2/2004	13/Plant Effluent Composite Daily	120			**6500**		870	<6.6	6.8	BOD
7/3/2004	13/Plant Effluent Composite Daily	98			430		470	16	7.8	
7/6/2004	13/Plant Effluent Composite Daily	160			940		480	<5.9	7.3	
7/6/2004	13/DC Plant Discharge Grab Monthly				1000		64	<5.9	7.2	
7/7/2004	13/Plant Effluent Composite Daily	100			**3500**		1400	61	6.6	BOD
7/9/2004	13/Plant Effluent Composite Daily	150			**8200**		270	<5.7	7.1	BOD
7/8/2004	13/Plant Effluent Composite Daily	130			1200		270	58	5.9	
7/10/2004	13/Plant Effluent Composite Daily	110			**4000**		400	63	7.4	BOD
7/13/2004	13/Plant Effluent Composite Daily	180			1600		150	92	6.3	
7/14/2004	13/Plant Effluent Composite Daily	170			**3600**		**1700**	13	7.7	BOD,TSS
7/15/2004	13/Plant Effluent Composite Daily	20			**7400**		120	5.8	7.6	BOD
7/16/2004	13/Plant Effluent Composite Daily	38			1200		340	34	6.9	
7/17/2004	13/Plant Effluent Composite Daily	22			1900		240	<5.6	7.4	
7/20/2004	13/Plant Effluent Composite Daily	100			####		400	9	7.8	BOD

Note: Total v

Subtota

Date Collected	Account/Sample Collected	Ammonia as Nitrogen	COD	CBOD	BOD	BODS	TSS	Oil & Grease	pH	Violations
7/21/2004	13/Plant Effluent Composite Daily	32			520		94	<6.2	7.3	
7/22/2004	13/Plant Effluent Composite Daily	38			1400		120	40	6.7	
7/23/2004	13/Plant Effluent Composite Daily	78			920		530	<6.2	7.4	
7/24/2004	13/Plant Effluent Composite Daily	26			150		49	<5.9	7.7	
7/27/2004	13/Plant Effluent Composite Daily	86			####		470	22	7.5	BOD
7/28/2004	13/Plant Effluent Composite Daily	26			####		180	<6.0	7.9	BOD
7/29/2004	13/Plant Effluent Composite Daily	36			830		430	11	6.4	
7/30/2004	13/Plant Effluent Composite Daily	18			360		270		6.5	
7/31/2004	13/Plant Effluent Composite Daily	14			260		180	<5.5	7.2	
8/3/2004	13/Plant Effluent Composite Daily	40			150		92	100	6.5	
8/3/2004	13/DC Plant Discharge Grab Monthly				**5400**		1200	90	6.7	BOD
8/4/2004	13/Plant Effluent Composite Daily	160			**8000**		1200	<6.1	7.0	BOD
8/5/2004	13/Plant Effluent Composite Daily	190			**6800**		930	22	6.6	BOD
8/6/2004	13/Plant Effluent Composite Daily	230			####		**2300**	110	6.8	BOD, TSS
8/7/2004	13/Plant Effluent Composite Daily	240			950		440	120	7.6	
8/14/2004	13/Plant Effluent Composite Daily	61			990		160	14	6.9	
8/17/2004	13/Plant Effluent Composite Daily	110			####		120	16	6.8	BOD
8/18/2004	13/Plant Effluent Composite Daily	30			2000		83	52	6.7	
8/19/2004	13/Plant Effluent Composite Daily	93			**2600**		340	270	6.2	BOD
8/20/2004	13/Plant Effluent Composite Daily	62			990		660	22	6.3	
9/8/2004	13/Plant Effluent Composite Daily		26000		####		240			BOD
9/9/2004	13/Plant Effluent Composite Daily		2100		1400		140			
9/10/2004	13/Plant Effluent Composite Daily		1800		**4000**		140			BOD

9/11/2004	13/Plant Effluent Composite Daily		1700		940		110			
9/12/2004	13/Plant Effluent Composite Daily		2000		1100		110			
9/14/2004	13/Plant Effluent Composite Daily		2400		1400		430			
9/15/2004	13/Plant Effluent Composite Daily		1300		790		160			
9/16/2004	13/Plant Effluent Composite Daily		2600		2000		930			
9/17/2004	13/Plant Effluent Composite Daily		3400		**2500**		1400			BOD

Figure 2 - Blood spill at Dallas Crown

Exhibit 3 – Waste Disposal at Natural Valley, SK

Figure 3 - Still from video of illegal dumping

Figure 4 - Disposal of internal organs at Natural Valley, SK