OREGON CAFO INSPECTION REPORT

GENERAL INFORMATION

Facility ID #: 1000032 **Facility Name:** Beef Northwest Feeders, LLC - Boardman **Facility Owner:** Beef Northwest Feeders, LLC **Facility Operator:** Pete Szasz **Mailing Address:** 66407 Taggares Lane, Boardman, OR 97818 **Physical Address:** 66407 Taggares Lane, Boardman, OR 97818 **County:** Morrow **Contact Person:** Wes Killion **Phone:** (office): 541-481-2386, (cell): (b) (6)-(b) (6) **E-mail:** wes.killion@beefnw.com **Persons Present During Inspection:** Wes Killion, Troy Murray, and Pete Szasz (Beef Northwest Feeders, LLC); Ben Krahn (Oregon Department of Agriculture [ODA]); Sirese Jacobson and Jennifer Ferrando (Eastern Research Group [ERG], EPA contractors)	**Inspector:** Jennifer Ferrando and Sirese Jacobson (ERG) **Inspection Date:** March 27, 2024 **Time in:** 8:30 AM **Time out:** 1:35 PM **Weather:** Overcast, intermittent light rain, approx. 55 °F **GPS Coordinates** North: 45.718914 West: -119.881804 **Does the facility owner/operator own and/or operate any other animal feeding operations?** Yes **If yes provide name(s) and address(es) and indicate whether the facility is an AFO or a CAFO:** All of the Beef Northwest facilities listed below are permitted CAFOs. The inspector did not request addresses for these facilities. • Beef Northwest Feeders – Nyssa (OR) • Beef Northwest Feeders – Columbia (OR) • Beef Northwest Feeders – Top Cut (OR) • Beef Northwest Feeders – Stage Gulch (OR) • Beef Northwest Feeders – Quincy (WA)

Location and name of nearest surface water and description of flow path:

According to the facility representatives, the nearest surface water is Sixmile Canyon Creek, an intermittent surface water, which flows to the Columbia River. Based on Google Earth imagery, Sixmile Canyon Creek is located approximately three miles east of the main production area and approximately one mile east of the pasture pen production area.

Max. Animals Confined per Month: 66,500

Max. Capacity of Facility: 66,500

Number of animals today (all animals in production area):

	# confined		# confined
Cattle	62,379	Other (horses)	40

X	**Presented credentials? (check if yes)**
X	**Inspection photos attached? (check if yes)**
X	**Potential compliance issues? (check if yes and summarize below)**

*Throughout, N/A = Not Applicable

SUMMARY OF POTENTIAL COMPLIANCE ISSUES

- Wastewater was observed to be impounding in the pasture production area composting area and was not draining to the collection pit, as designed. The inspectors did not observe evidence of runoff exiting this area. See question 35. If the permittee's practice is to collect and retain composting area runoff in this area, this practice should be included in the AWMP. The general permit requires that the AWMP include "[p]rocedures to ensure collection, handling, and storage of contaminated stormwater runoff from the production area, manure, litter, and process wastewater in compliance with the requirements of S2. Discharge Limitations and Operating Requirements. Calculations used to determine that storage capacity exists must be provided…" (condition S3.C.2(a)). In addition, if this area is to be maintained as a waste storage structure, per 40 CFR 412.37(b)(5), the facility must maintain documentation of the current design of any manure or litter storage structures, including volume for solids accumulation, design treatment volume, total design volume, and approximate number of days of storage capacity; design documentation to ensure it has adequate storage capacity, per 40 CFR 412.37(b)(5).

- The facility's weekly visual inspection records did not identify maintenance deficiencies for the settling cell SC-12 observed during the inspection or actions taken to correct deficiencies. During the closing conference, the facility representatives stated that they would remove solids and regrade the settling cell. On May 10, 2024, Mr. Killion provided a photo showing that the settling cell had been graded to allow wastewater to flow east, as designed. See *Additional Production Area Comments* and Attachment 1 - Photograph 6. The federal regulations at 40 CFR 412.37 require permitted large CAFOs to correct deficiencies found as a result of weekly visual inspections as soon as possible (paragraph (a)(3)) and to maintain records documenting the actions taken to correct the deficiencies (paragraph (b)(3)). The general permit includes equivalent requirements in condition S4.B.2.

- The depth marker in Lagoon 1 did not appear to be accurate and may be showing more available capacity than is actually available based on the maximum depth of the impoundment reported by the facility and the wastewater reading from the depth marker compared to the freeboard observed at the time of the inspection. See *Additional Production Area Comments*. In addition, the depth markers in Lagoons 1 and 2 and the Pasture Pond did not indicate pump down levels and maximum design capacity. See question 41. Furthermore, the facility was not maintaining depth records for Lagoon 2c and did not maintain depth records for Lagoon 1 from February 2023 through February 2024. See question 20. The federal regulations at 40 CFR 412.37(a)(2) require that all open surface impoundments have depth markers that clearly indicate the minimum capacity necessary to contain the runoff and direct precipitation of the 25-year, 24-hour rainfall event. General permit condition S2.E.3 further requires that the depth marker indicate the maximum design volume. The federal regulations at 40 CFR 412.37(b)(2) and general permit condition S4.B.1(d) require permitted large CAFOs to maintain weekly records of the depth of wastewater in the impoundment as indicated by the depth marker. In a May 10, 2024, email, the facility representative Mr. Killion notified the inspectors that Lagoon 1 had been agitated and the

depth marker reset. Mr. Killion also provided photos of the depth markers in Lagoons 1, 2, 2a, 2b, and 2c (Photographs 1-5 in Attachment 1). On May 14, 2024, Mr. Killion provided the inspectors with a copy of its daily inspection form for 3/20/2024-5/13/2024 which included Lagoon 2c depth records and a new column "Date leak fixed".

- The facility was not maintaining adequate storage capacity to contain the stormwater runoff and direct precipitation from a 25-year, 24-hour storm. The photos of the lagoon depth markers provided by the facility to the inspectors in an email on May 10, 2024, showed that the depth markers indicate the freeboard levels. However, Mr. Killion noted in his email that the lines indicating the pumping levels were below the surface of the wastewater (Photographs 1-5 in Attachment 1). In addition, at the time of the inspection, wastewater in the Pasture Pond was also above the pumping level (Photograph 35). See question 34. General permit condition S2.E.2 requires that the permittee operate and maintain all waste storage facilities to contain all manure, litter, process wastewater, and stormwater runoff and precipitation from a 25-year, 24-hour rainfall event for the storage period established in the ODA-approved AWMP. General permit condition S2.E.1 requires that the permittee "provide adequate storage capacity for solid and liquid waste at all times…" The federal regulations at 40 CFR 122.42(e)(1)(i) require a permitted CAFO implement a NMP which ensures adequate storage of manure, litter, and process wastewater, including procedures to ensure proper operation and maintenance of the storage facilities.

- The facility could not provide copies of lagoon design documentation to the inspectors during the inspection. Mr. Killion provided this documentation on May 10, 2024, via email. See question 16. The federal regulations at 40 CFR 412.37(b)(5) require permitted CAFOs to maintain records documenting the current design of any manure or litter storage structures, including volume for solids accumulation, design treatment volume, total design volume, and approximate number of days of storage capacity.

- The facility's daily inspection checklist did not contain space to document deficiencies (with the exception of water leaks) and actions taken to address deficiencies. See questions 19.c and 21. The federal regulations at 40 CFR 412.37 require permitted large CAFOs to correct deficiencies found as a result of weekly visual inspections as soon as possible (paragraph (a)(3)) and to maintain records documenting the actions taken to correct the deficiencies (paragraph (b)(3)). The general permit includes equivalent requirements in condition S4.B.2.

- The AWMP does not accurately reflect onsite conditions. The AWMP states that there are no clean water diversions in the production area. However, according to the facility representatives, there is a berm along the north side of the facility and run-on from the east side of the facility is diverted from the production area by topography as well as two pumpstations that capture runoff. See question 4. The federal regulations at 40 CFR 122.42(e)(1)(iii) and the general permit at condition S3.C.2(d) require that permitted CAFOs implement a nutrient management plan (NMP) that includes best management practices (BMPs) to ensure that clean water is diverted, as appropriate, from the production area.

- The AWMP does not specifically address chemical disposal. According to the facility representatives, no chemicals are disposed of onsite. Used oil from the shop is hauled offsite by a third party. See question 6. The federal regulations at 40 CFR 122.42(e)(1)(v) require that a permitted CAFO's NMP must ensure proper disposal of chemicals and other contaminants.

- The AWMP instructs the operator to record "daily inspections, weekly inspections, corrective actions taken, explain those not corrected, and total amount of manure or wastewater transferred to other persons, including date and amount of each transfer and the name and address of each recipient with a copy of the nutrient analysis." The AWMP does not address recordkeeping for the implementation of the other minimum NMP elements that will be maintained. See question 10. The federal regulations at 40 CFR 122.42(e)(1)(ix) require that a permitted CAFO implement an NMP that identifies specific records that will be maintained to document the implementation and management of the minimum required elements of the nutrient management plan.

- The AWMP specifies the manure sampling parameters as required in the general permit, but does not specify manure sampling at the frequency required in the general permit. The federal regulations at 40 CFR 122.42(e)(1)(vii) require a permitted CAFO to implement an NMP that identifies protocols for appropriate testing of manure, litter, process wastewater, and soil. The facility does not land apply manure or process wastewater to land under its control. See question 12. The facility transfers solid manure to a third party. The federal regulations at 40 CFR 122.42(e)(3) and general permit condition S2.K.3 require the facility to provide recipients of transferred manure with the results of the most current manure nutrient analysis; therefore, the NMP should include protocols for manure testing as required by the general permit. The general permit condition S4.A.2 requires that manure be sampled annually for total nitrogen and total phosphorus.

INSPECTION OBSERVATIONS

Nutrient Management Plan (NMP)

Required NMP Element [40 CFR 122.42(e)(1)]

No 1. *Is the facility's NMP available on-site? Does it reflect the current operational characteristics and practices? [40 CFR 122.42(e)(2)(ii)]*

Date developed or last revised: April 15, 2022

The facility maintains the most recent AWMP (signed by Wes Killion on 4/15/2022) on site. Refer to question 4 regarding the AWMP not reflecting current operational characteristics.

TBD* 2. *Ensure adequate storage of manure and process wastewater, including operation and maintenance procedures. [40 CFR 122.42(e)(1)(i)]*
To be evaluated as part of the detailed AWMP review that will be provided to EPA separately.

Yes 3. *Ensure proper management of animal mortalities. [40 CFR 122.42(e)(1)(ii)]*
The AWMP states that mortalities are hauled to a designated area to be composted by Columbia River Dairy or alternatively may be placed in a designated area for pickup for a rendering facility or hauled to landfill weekly.

No 4. *Ensure that clean water is diverted, as appropriate, from the production area. [40 CFR 122.42(e)(1)(iii)]*
The AWMP states that there are no clean water diversions in the production area. The facility representatives indicated that there is a berm along the north side of the facility and run-on from the east side of the facility is diverted from the production area by topography as well as two pumpstations that capture runoff.

N/A 5. *Prevent direct contact of confined animals with surface waters. [40 CFR 122.42(e)(1)(iv)]*
The AWMP does not address preventing direct contact of confined animals with surface waters; the inspectors did not observe any surface waters within the production area.

No 6. *Ensure proper disposal of chemicals and other contaminants. [40 CFR 122.42(e)(1)(v)]*
The AWMP does not specifically address chemical disposal. According to the facility representatives, no chemicals are disposed of onsite. Used oil from the shop is hauled offsite by a third party.

*Throughout, TBD = To Be Determined and refers to items that will be evaluated as part of the detailed AWMP review that will be provided to EPA separately on or before September 19, 2024.

Nutrient Management Plan (NMP) (continued)

N/A 7. *Identify site-specific conservation practices to control runoff of pollutants. [40 CFR 122.42(e)(1)(vi)]*
The facility does not land apply manure or wastewater. All wastewater and manure is contained onsite.

Yes 8. *Identify protocols for manure, process wastewater, and soil sampling and testing. [40 CFR 122.42(e)(1)(vii)]*
The AWMP includes a description of solid manure sample collection (Section 3.a.i) and specifies that solid manure will be tested for total nitrogen and total phosphorus, at a minimum. The AWMP does not identify protocols for liquid manure or soil sampling;

however, the facility does not land apply manure or wastewater to land under its operational control and does not transfer liquid manure to third parties. Wastewater in the facility's impoundments is evaporated.

N/A 9. *Establish protocols to land apply manure or process wastewater in accordance with site-specific nutrient management practices that ensure appropriate agricultural utilization of the nutrients in the manure, litter, or process wastewater. [40 CFR 122.42(e)(1)(viii)]*
The facility does not land apply manure or process wastewater.

No 10. *Identify specific records that will be maintained to document the implementation and management of the minimum NMP elements (#2-#9 above).*
The AWMP instructs the operator to record "daily inspections, weekly inspections, corrective actions taken, explain those not corrected, and total amount of manure or wastewater transferred to other persons, including date and amount of each transfer and the name and address of each recipient with a copy of the nutrient analysis." The AWMP does not address recordkeeping for the implementation of the other minimum NMP elements, which will be maintained.

Additional NMP Requirements for Large Dairy Cow, Cattle, Swine, Poultry, and Veal Calf CAFOs

N/A 11. *Application rates are calculated as required by 40 CFR 412.4(c)(2).*

No 12. *Specifies the manure, process wastewater, and soil sampling at the required frequencies and for the required parameters? [40 CFR 412.4(c)(3)] (manure/wastewater annually for P & N, soils at least every 5 years for phosphorus transport)*
The AWMP specifies the manure sampling parameters as required in the general permit (total nitrogen and total phosphorus), but the AWMP does not specify manure sampling at the frequency required in the general permit (i.e., annual sampling and analysis).

N/A 13. *Includes periodic inspection of land application equipment? [40 CFR 412.4(c)(4)]*
The facility does not have land application equipment because no land application of manure occurs to land under its operational control. The AWMP states that all manure is exported.

NA 14. *Includes 100-foot setback or 35-foot vegetated buffer, or approved alternative? [40 CFR 412.4(c)(5)]*
The facility does not land apply manure or process wastewater to land under its operational control. The AWMP states that all manure is exported.

Monitoring, Documentation and Recordkeeping

Does the facility maintain the following records?

Yes 15. *The completed permit application? [40 CFR 412.37(b)]*
The facility representative noted that they maintain a copy of the renewal application for the 2016 permit. The inspectors did not view the document.

Yes 16. *The current design of manure storage structures, including volume of solids accumulation, design treatment volume, total design volume, and approximate number of days of storage capacity? [40 CFR 412.37(b)(5)]*
According to the facility representatives, design documentation for the wastewater impoundments is maintained on-site. Documentation was not provided to the inspectors during the inspection, but was provided by Mr. Killion in a follow-up email on May 10, 2024.

N/A 17. *The date, time, and estimated volume of any overflow? [40 CFR 412.37(b)(6)]*
The Inspection Team was not provided overflow records to review because the facility operator stated there have been no overflows from the facility's impoundments.

Yes 18. *Manure and process wastewater transfers, including the most current nutrient analysis of the manure or wastewater that was provided to the recipient, the date and approximate amount transferred, and the name and address of the recipient? [40 CFR 122.42(e)(3)]*

Yes *a. Name of recipient*

Yes *b. Address of recipient*

Yes *c. Date of transfer*

Yes *d. Approximate amount transferred (tons/gallons)*

No *e. Recent (12 months or less) manure nutrient analysis provided*

The facility transfers manure to one recipient, Cascade Agronomics. The facility representative stated that both the facility and the recipient collect a sample of the manure. The facility does not provide the results to the recipient. The recipient provides a copy of their results to the facility.

Additional Production Area Records for Large Dairy Cow, Cattle, Swine, Poultry, and Veal Calf CAFOs

Yes 19. *Documentation of daily and weekly visual inspections of the production area, including:*

Yes a. *Weekly inspection of stormwater diversions, waste storage structures, and process wastewater channeling devices? [40 CFR 412.37(b)(1)]*

Yes b. *Daily inspection of water lines? [40 CFR 412.37(b)(1)]*

Yes c. *Weekly inspection of impoundments and tanks? [40 CFR 412.37(b)(1)]*

According to the facility representatives, they maintain records for approximately 10 years. The facility provided examples of their general daily inspection checklists (3/23/21-4/18/21 and 2/28/24 – 3/27/24) where the facility documented ditches and pipe repair, settling cells and lift pumps, wastewater levels in Lagoon 1 and Lagoon 2, water leaks. The checklist did not contain space for the facility to document deficiencies (with the exception of water leaks) and actions taken to address deficiencies.

No 20. *Weekly records of the depth of manure and process wastewater in liquid impoundments and terminal tanks? [40 CFR 412.37(b)(2)]*
All of the facility's lagoons contain depth markers. According to the facility representatives, Lagoons 2, 2a, and 2b are connected via a pipe between each lagoon. Each pipe contains a gate valve to allow the facility to isolate each lagoon. Lagoon 2c receives runoff from 2 rows of cattle pens and is not connected to any other lagoons. The facility records included daily staff gauge readings for Lagoons 2 and the Pasture Pond. Staff gauge readings for Lagoon 1 were not documented for the period from February 2023 through February 2024. The facility was not maintaining records of the depth of manure and process wastewater in Lagoon 2c.

No 21. *Documentation of actions taken to correct deficiencies found as a result of production area inspections? [40 CFR 412.37(b)(3)]*
As noted in question 19.c., the facility was documenting instances of water leaks at the facility and the facility representative stated that leaks are corrected immediately. However, the facility was not documenting other deficiencies and actions taken to correct deficiencies in the checklist reviewed. The facility representative stated that deficiencies are noted and immediately addressed.

Yes 22. *Documentation of mortalities management? [40 CFR 412.37(b)(4)]*
The facility representative stated that they maintain herd records documenting all animal mortalities.

Land Application Area Records for Large Dairy Cow, Cattle, Swine, Poultry, and Veal Calf CAFOs

N/A 23. *Expected crop yields? [40 CFR 412.37(c)(1)]*

N/A 24. *Date(s) manure or process wastewater is applied to each land application site? [40 CFR 412.37(c)(2)]*

N/A 25. *Weather conditions at the time of, and for 24 hours prior to and following, land application? [40 CFR 412.37(c)(3)]*

Monitoring, Documentation and Recordkeeping (continued)

N/A 26. *Test methods used to sample and analyze manure, process wastewater, and soil? [40 CFR 412.37(c)(4)]*
The inspectors requested these records at the time of the inspection and the facility representative provided the methods in a follow-up email on May 10, 2024. However, the inspectors acknowledge, upon further review of the regulations, that the regulatory requirements at 40 CFR 412.4(c) apply to CAFOs that land apply manure, which Beef Northwest Feeders does not do.

Yes 27. *Results from manure, process wastewater, and soil analyses? [40 CFR 412.37(c)(5)]*
The facility representatives provided copies of manure analyses to the inspection team for review while onsite. The inspectors observed manure test results for samples collected on 5/19/2021 and 9/14/2023. The facility does sample soil or process wastewater.

N/A 28. *Manure and process wastewater application rates determined in accordance with the technical standards? [40 CFR 412.37(c)(6)]*

N/A 29. *Calculations showing the total N and P to be applied to each land application site, including sources other than manure or process wastewater? [40 CFR 412.37(c)(7)]*

N/A 30. *Total amount of N and P actually applied to each land application site, including calculations? [40 CFR 412.37(c)(8)]*

N/A 31. *Method used to apply manure and process wastewater? [40 CFR 412.37(c)(9)]*

N/A 32. *Date(s) of manure application equipment inspections for leaks? [40 CFR 412.37(c)(10)]*

Land Application Sites

No 33. *Does the facility apply manure or wastewater to land owned by or under the operational control of the CAFO?*

- *Number of land application sites:* None
- *Irrigation type(s):* N/A
- *Furrow/flood irrigation sites – what is fate of applied wastewater and tailwater?* N/A

Production Area

34. *List impoundments (attach additional sheet(s), if needed)*

Impoundment ID	Wastewater Type	Wastewater Source(s)	Pumping level[1]	Wastewater below pumping level?[2]	Max. recorded level	Date of max. recorded level
Lagoon 1	☒ process generated ☒ runoff	Feed mill area and boiler; manure handling area; silage area; runoff from cattle pens	3.10 ft	No; approximately 5.8 ft on May 10, 2024	4.25 ft	3/7/24 - 3/27/24
Lagoon 2	☐ process generated ☒ runoff	Runoff from cattle pens; Lagoon 2a and 2b	2.00 ft	No; approximately 5.0 ft on May 10, 2024	6.25 ft	3/23/21 – 4/15/21
Lagoon 2a	☐ process generated ☒ runoff	Runoff from cattle pens; Lagoons 2 and 2b	2.15 ft	No; approximately 4.5 ft on May 10, 2024	N/A	N/A
Lagoon 2b	☐ process generated ☒ runoff	Lagoons 2 and 2a	2.90 ft	No; approximately 5.8 ft on May 10, 2024	N/A	N/A
Lagoon 2c	☐ process generated ☒ runoff	Runoff from cattle pens	4.60 ft	No; approximately 5.6 ft on May 10, 2024	N/A	N/A
Pasture Pond	☐ process generated ☒ runoff	Runoff from cattle pens; composting area	6.40 ft	No; at the time of the inspection, wastewater was at approximately 6.7 ft	6.5 ft	3/25/24

[1] The pumping level represents the minimum capacity necessary to contain runoff and direct precipitation from the 25-year, 24-hour rainfall event (40 CFR 40 CFR 412.37(a)(2)).

[2] The wastewater levels for Lagoons 1, 2, 2a, 2b, and 2c shown here were observed from photos of the lagoon depth markers taken by the facility representatives and provided to the inspectors on May 10, 2024.

35. Impoundment(s) collect all runoff from:

Yes *Animal confinement areas?*[3]

No *Manure storage areas?*[4]

Manure is generally stored in the pens until being removed for export. Runoff from the pens in the main production area flows to conveyance ditches and/or settling cells which convey flow to the lagoons. Runoff from the pens in the pasture production area flows to a collection pit located at the east end of the pens. Wastewater in the collection pit is pumped to the Pasture Pond.

Some manure is placed in windrows and turned several times until dry. Runoff from the manure handling area at the main production area flows to a pump station and then into Lagoon 1. During the inspection, the composting area at the pasture production area did not appear to drain to the Pasture Pond. Instead, the inspectors observed water impounding in this composting area. According to the facility representative, the composting area in the pasture production area has been tested for compliance with ODA's soil compaction and permeability requirements. The inspectors did not observe evidence of runoff exiting this area.

Yes *Raw material storage areas?*[5]

Yes *Waste containment areas?*[6]

N/A *Egg washing or egg processing facility?*

Production Area (continued)

Yes *Mortality storage, handling, treatment or disposal area?*

N/A *Other?*

No 36. *Was manure or wastewater observed in a waterway? If yes, describe:*

No 37. *Adequate storage available for manure, litter, and process wastewater, and procedures are in place to ensure proper operation and maintenance of the storage facilities? [40 CFR 122.42(e)(1)(i)]*

The inspectors did not observe evidence of overtopping, leakage, or other indications that the storage capacity of the impoundments is not adequate (AWMP storage capacity information to be evaluated as part of the detailed AWMP review that will be provided to EPA separately).

[3] Animal confinement area includes but is not limited to open lots, housed lots, feedlots, confinement houses, stall barns, free stall barns, milkrooms, milking centers, cowyards, barnyards, medication pens, walkers, animal walkways, and stables (40 CFR 40 CFR 122.23(b)(8)).

[4] Manure storage area includes but is not limited to lagoons, runoff ponds, storage sheds, stockpiles, under house or pit storages, liquid impoundments, static piles, and composting piles (40 CFR 40 CFR 122.23(b)(8)).

[5] Raw materials storage area includes but is not limited to feed silos, silage bunkers, and bedding materials (40 CFR 40 CFR 122.23(b)(8)).

[6] The waste containment area includes but is not limited to settling basins, and areas within berms and diversions which separate uncontaminated storm water (40 CFR 40 CFR 122.23(b)(8)).

Yes 38. *Confined animals do not have direct contact with waters of the United States? [40 CFR 122.42(e)(1)(iv)]*

Yes 39. *Clean water is diverted from the production area? [40 CFR 122.42(e)(1)(iii)]*

Yes 40. *Chemicals and other contaminants handled on-site are not disposed of in any manure, litter, process wastewater, or storm water storage or treatment system? [40 CFR 122.42(e)(1)(v)]*

The facility representatives stated that no chemicals are disposed of onsite. Used oil from the shop is hauled offsite by a third party. The inspectors did not view the chemical storage area.

Additional Production Area Requirements for Large Dairy Cow, Cattle, Swine, Poultry, and Veal Calf CAFOs (Subparts C and D)

No 41. *All open surface impoundments and terminal storage tanks have depth markers which clearly indicate the minimum capacity necessary to contain the runoff and direct precipitation of the 25-year, 24-hour rainfall event? [40 CFR 412.37(a)(2)]*

The facility maintains depth markers in all lagoons. At the time of the inspection, the depth markers did not clearly indicate the minimum capacity necessary to contain the runoff and direct precipitation of the 25-year, 24-hour rainfall event. On May 10, 2024, the facility representative Mr. Killion provided the inspectors with photos of depth markers in each lagoon. Mr. Killion noted that each depth marker indicates the minimum capacity necessary to contain runoff from the 25-year, 24-hour storm; however, because the wastewater levels were above the pumping levels in each lagoon, these marks were not visible. The depth markers in the photos provided by the facility were marked with the maximum impoundment capacity.

Production Area (continued)

Yes 42. *Mortalities remain in the production area until disposal, are not disposed in liquid manure or process wastewater treatment systems, and are handled to prevent discharge of pollutants to surface waters? [40 CFR 412.37(a)(4)]*

According to the facility representatives, a necropsy is performed at the facility hospital barn before mortalities are moved to the mortality holding area located near SC-12. Mortalities are composted by Columbia River Dairy.

Additional Production Area Comments:

Generally, runoff from the pens in the main production area flow to conveyance ditches (Photographs 2-4, 13, 15, 28, and 29) and then into settling cells [Photographs 12, 14, 17, 18, 19, and 21-25). As described in the AWMP, wastewater from the settling cells flows to either pump stations or to Lagoon 2a (Photographs 7 and 9). The facility has three pump stations which pump collected runoff to Lagoon 1 (Photograph 16).

The facility representatives stated that the settling cells and conveyance ditches throughout the main production area are lined with bentonite clay. In addition, the lagoons are lined as follows:

- Lagoon 1: HDPE liner

- Lagoon 2: Concrete and HDPE liner
- Lagoon 2a: Earthen clay liner
- Lagoon 2b: Concrete liner
- Lagoon 2c: Concrete and HDPE liner
- Pasture Pond: Compacted clay liner

During the site tour, there appeared to be approximately 1.5 feet of freeboard in Lagoon 1. Wastewater was at approximately 4.5 feet on the depth marker. The facility representatives stated that the total depth of Lagoon 1 is 7 feet. Therefore, the depth marker does not appear to be accurate and may be showing more available capacity than is actually there.

During the site tour, the inspection team observed buildup of solids in settling cell SC-12 which did not allow wastewater to flow east into the subsequent conveyance ditches and settling cells, as designed (Photograph 12).

Inspector: _____ **Date:** 8/09/2024

Site Maps

Figure 1. Aerial image showing the approximate boundary of the main production area at Beef Northwest Feeders.

Figure 2. Aerial image of the main production area at Beef Northwest Feeders taken from the facility's April 15, 2022 AWMP.

Figure 3. Aerial image of the pasture production area at Beef Northwest Feeders.

Photograph Log

Photograph 1. View looking south along the western border of north pens at the main production area toward the silage storage area.

Photograph 2. View looking southeast along conveyance ditch CD-6 near the shipping and receiving building.

Photograph 3. Alternative view of wastewater within conveyance ditch CD-6, view looking north.

Photograph 4. Alternative view of wastewater in conveyance ditch CD-6, view looking south.

Photograph 5. View looking southeast across Lagoon 2b.

Photograph 6. View looking north toward the depth marker in Lagoon 2b.

Photograph 7. View looking northwest over Lagoon 2a.

Photograph 8. View looking southwest over Lagoon 2c.

Photograph 9. View of the depth marker in Lagoon 2a, view looking northeast.

Photograph 10. View of depth markings on the side of Lagoon 2c, view looking southeast.

Photograph 11. View of depth markings on the side of Lagoon 2, view looking north.

Photograph 12. Settling cell SC-12 receives runoff from adjacent cattle pens, view looking east.

Photograph 13. Conveyance ditch CD-2a conveys cattle pen runoff to settling cell SC-13, view looking east.

Photograph 14. Settling cell SC-13 receives runoff from the adjacent cattle pens, view looking east.

Photograph 15. Conveyance ditch CD-2b conveys cattle pen runoff to settling cell SC-14, view looking east.

Photograph 16. View of the depth marker in Lagoon 1.

Photograph 17. Alternative view of settling cell SC-14, looking west.

Photograph 18. Settling cell SC15 receives runoff from the adjacent cattle pens, view looking east.

Photograph 19. Settling cell SC-16 receives runoff from the adjacent cattle pens, view looking west.

Photograph 20. View of compost rows in the portion of the manure handling area located north of Lagoon 1.

Photograph 21. Settling cell SC-5 and settling cell SC-11 receive runoff from the adjacent cattle pens, view looking north.

Photograph 22. Settling cell SC-4 and settling cell SC-10 receive runoff from the adjacent cattle pens, view looking northeast.

Photograph 23. Settling cell SC-3 and settling cell SC-9 receive runoff from the adjacent cattle pens, view looking northeast.

Photograph 24. Settling cell SC-2 and settling cell SC-9 receive runoff from the adjacent cattle pens, view looking northeast.

Photograph 25. Settling cell SC-1 receives runoff from the adjacent cattle pens, view looking north.

Photograph 26. View of potato and hopper waste in the feed mill area.

Photograph 27. View looking west toward the feed mill and wastewater from the feed mill and boiler blowdown.

Photograph 28. View of point in conveyance ditch CD-3 where wastewater from the mill and boiler blow down enter the ditch. Conveyance ditch CD-3 flows south to settling cell SC-7 and then to a pump station which pumps wastewater to Lagoon 1.

Photograph 29. Alternative view of conveyance ditch CD-3, immediately downstream of Photograph 28, view looking south.

Photograph 30. View looking east at vegetated “pivot pens” (fenced grazing areas located within irrigated fields) located near the pasture production area.

Photograph 31. View looking north across an actively grazed, vegetated dryland pasture pen and feed trough.

Photograph 32. View looking west along the northern border of the composting area.

Photograph 33. View looking north at the Pasture Pond collection pit which receives runoff from the adjacent cattle pens. Wastewater is pumped from the collection pit to the Pasture Pond.

Photograph 34. View looking north across the Pasture Pond. The depth marker is visible in the center of the photograph.

Photograph 35. The depth marker in the Pasture Pond.

Photograph 36. View looking south at the potato slurry tank at the facility's pasture production area. Potato processing waste is hauled to the facility and stored in this tank for feeding the cattle. Spills or overflows from this tank would flow to the Collection Pit.

Attachment 1. Photos Provided by the Facility Following the Inspection

On May 10, 2024, the facility representative Mr. Killion emailed the inspection team the following photos of lagoon depth markers and the regraded settling cell SC-12, taken by the facility representative on May 10, 2024.

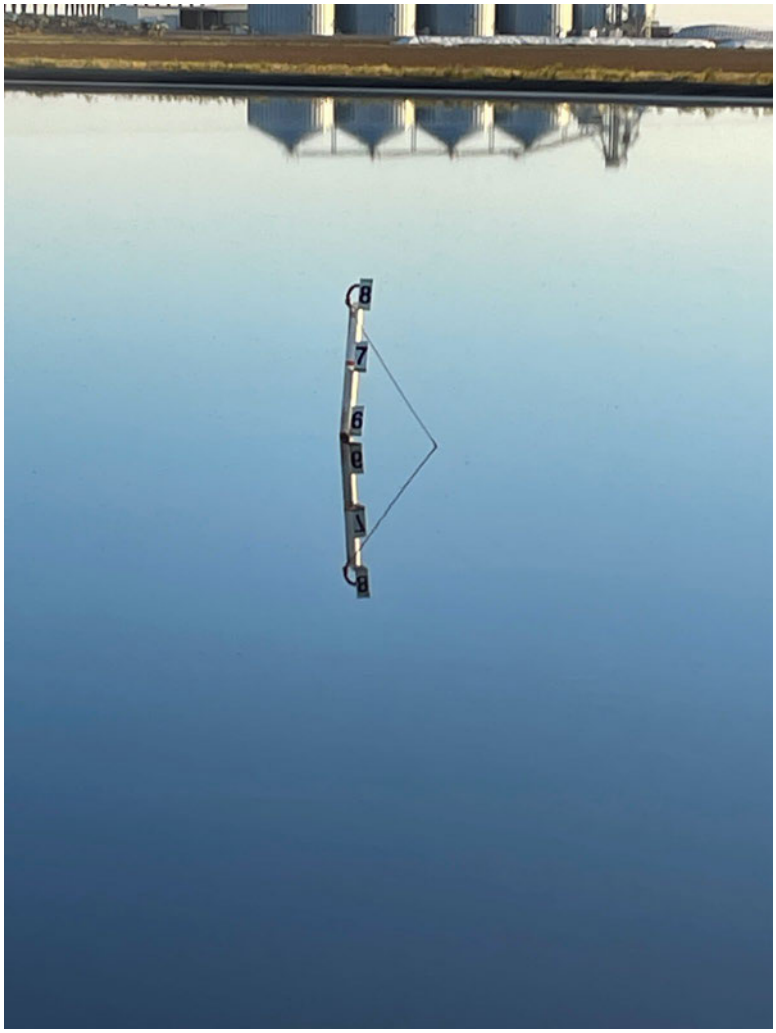

Photo 1. The depth marker in Lagoon 2B with a mark identifying the freeboard level at 7.0 feet. The pumping level mark is below the surface of the wastewater.

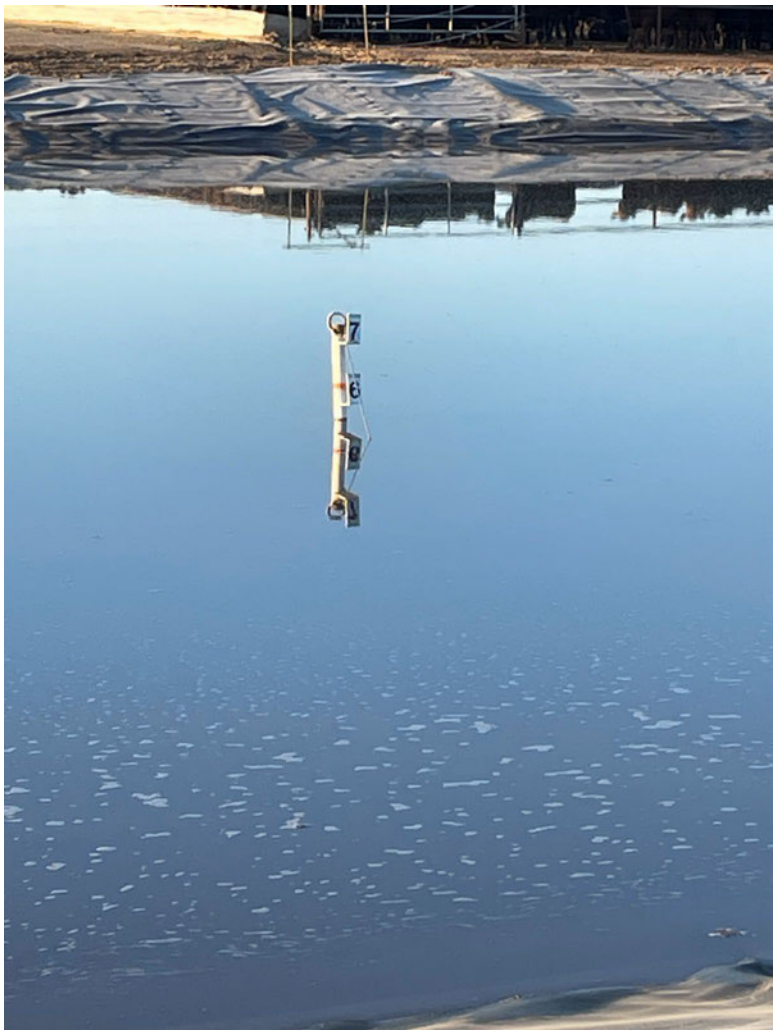

Photo 2. The depth marker in Lagoon 2C with a mark identifying the freeboard level at 6.3 feet. The pumping level mark is below the surface of the wastewater.

Photo 3. The depth marker in Lagoon 2A with a mark identifying the freeboard level at 5 feet. The pumping level mark is below the surface of the wastewater.

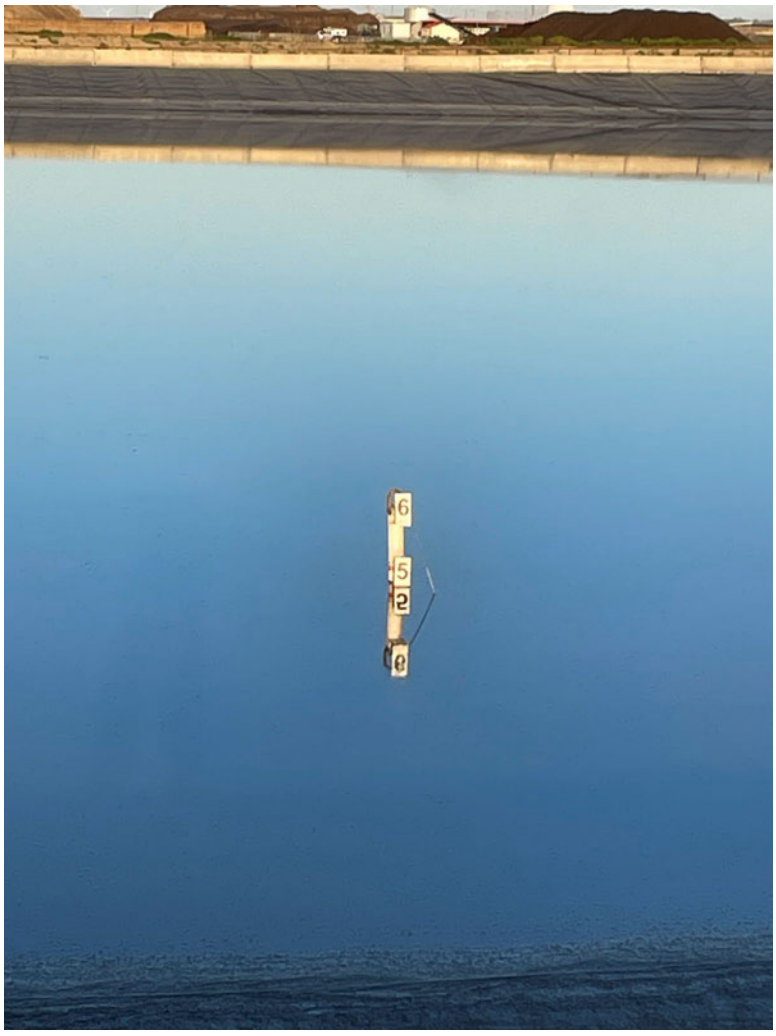

Photo 4. The depth marker in Lagoon 2 with a mark identifying the freeboard level at 5.25 feet. The pumping level mark is below the surface of the wastewater.

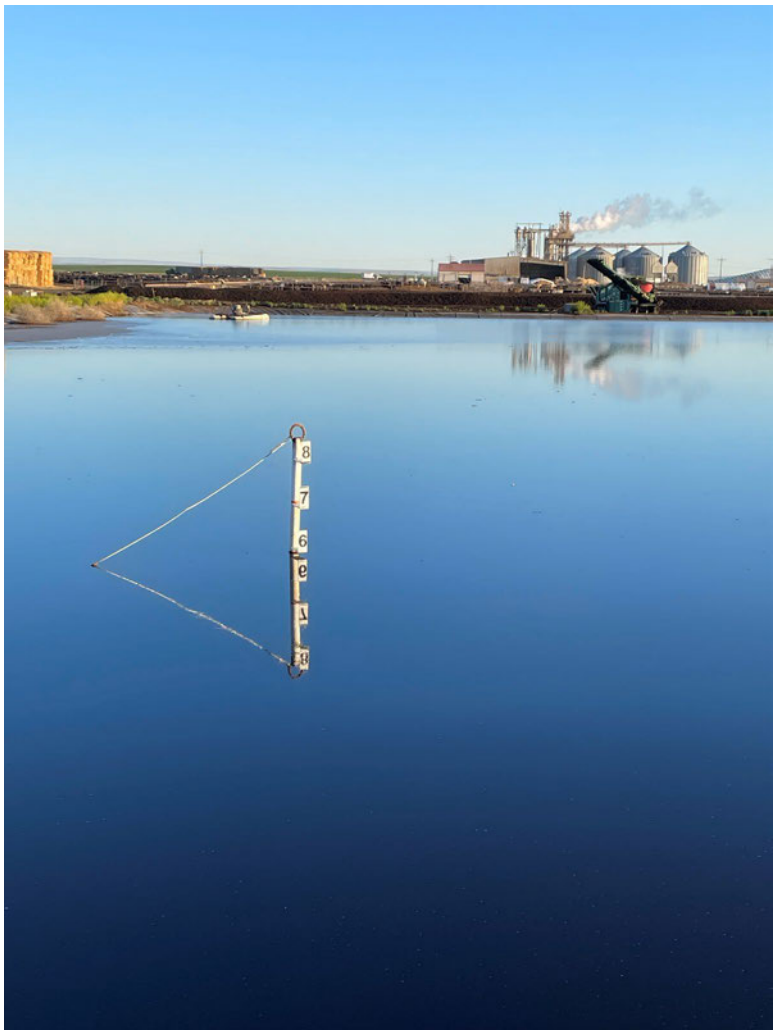

Photo 5. The depth marker in Lagoon 1 with a mark identifying the freeboard level at 7.0 feet. The pumping level mark is below the surface of the wastewater.

Photo 6. View of settling cell SC-12 after the facility regraded the settling cell.