

WASHINGTON CAFO INSPECTION REPORT

GENERAL INFORMATION

Facility ID #: N/A – unpermitted CAFO Facility Name: Riverview Ranch Facility Owner: Gary Visser, DVM Facility Operator: Jason Smeenk Mailing Address: 1220 Vance Rd, Mabton, WA 98935 Physical Address: 1220 Vance Rd, Mabton, WA 98935 County: Yakima Contact Person: Jason Smeenk Phone: (office): (509) 728-5008 E-mail: smeenkdairy@gmail.com Persons Present During Inspection: Jason Smeenk (Riverview Ranch); Obadiah Sheriff (Washington State Department of Agriculture [WSDA]); Sirese Jacobson and Chris Pardo (Eastern Research Group [ERG], EPA contractors); Jon Klemesrud (U.S. EPA)	Inspector: Sirese Jacobson and Chris Pardo (ERG) Inspection Date: August 23, 2024 Time in: 8:40 AM Time out: 11:45 AM Weather: Cloudy, approx. 70 °F GPS Coordinates North: 46.229368 West: -119.983434 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: - Smeenk Brothers Dairy #1 – Sunnyside, WA - Smeenk Brothers Dairy #2 – Sunnyside, WA The inspection team did not determine whether these AFOs are CAFOs.												
Location and name of nearest surface water and description of flow path: The nearest surface water is the Yakima River, located approximately 0.2 miles north of the production area (see Figures 1 and 2 in the Site Map section below).													
Max. Animals Confined per Month: According to the facility representative, the number of animals confined on the day of the inspection is the average number of animals confined each month.													
Max. Capacity of Facility: The facility representative did not know the maximum facility capacity.													
Number of animals today (all animals in production area): <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th># confined</th> <th></th> <th># confined</th> </tr> </thead> <tbody> <tr> <td>Dairy mature</td> <td>~1,200</td> <td>Dairy heifers</td> <td>~400</td> </tr> <tr> <td>Other (calves)</td> <td>~5</td> <td>Other (goats)</td> <td>3-5</td> </tr> </tbody> </table>			# confined		# confined	Dairy mature	~1,200	Dairy heifers	~400	Other (calves)	~5	Other (goats)	3-5
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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

- The facility's land application records did not include calculations of pounds of nutrients applied. It is recommended that the facility operator consider revising its records to include space for calculating pounds of phosphorus and nitrogen applied to maintain the information necessary to demonstrate that nutrients are land applied in accordance with the nutrient management plan (NMP). The federal regulations at 40 CFR 122.23(e)(1) require records of land application at rates that ensure appropriate agricultural utilization of the nutrients for discharges from the land application area to a Water of the U.S. to meet the agricultural stormwater definition.
- During the site tour of the production area, the inspection team observed residual silage in the ditch along Vance Road. The ditch was dry at the time of the inspection and appeared to dead-end at the corner of the production area. The ditch did not appear to be connected to a WOTUS; however, the inspection team recommended the facility maintain residual silage within the production area and out of the ditch to prevent any process-generated wastewater from leaving the production area.

INSPECTION OBSERVATIONS**Nutrient Management Plan (NMP)***Required NMP Element [40 CFR 122.42(e)(1)]*

- | | |
|-----|--|
| No | <p>1. <u>Is the facility's NMP available on-site? Does it reflect the current operational characteristics and practices? [40 CFR 122.42(e)(2)(ii)]</u></p> <p><u>Date developed or last revised:</u> The Riverview Ranch NMP was not available onsite; however, the facility representative stated that the NMP was last revised in 2011. The inspection team requested the NMP from the facility after the inspection, but the NMP was not provided to the inspection team before the final report was submitted to the EPA. Therefore, the following questions regarding NMP elements could not be answered and are listed as "Unknown" (Unk).</p> |
| Unk | <p>2. <u>Ensure adequate storage of manure and process wastewater, including operation and maintenance procedures. [40 CFR 122.42(e)(1)(i)]</u></p> <p>The NMP was not provided to the inspection team for review.</p> |
| Unk | <p>3. <u>Ensure proper management of animal mortalities. [40 CFR 122.42(e)(1)(ii)]</u></p> <p>The NMP was not provided to the inspection team for review. According to the facility representative, mortalities are temporarily stored onsite before being hauled offsite by a rendering company.</p> |
| Unk | <p>4. <u>Ensure that clean water is diverted, as appropriate, from the production area. [40 CFR 122.42(e)(1)(iii)]</u></p> <p>The NMP was not provided to the inspection team for review. Based on the topography of the production area and surrounding areas, it did not appear to the inspection team that clean water needs to be diverted from the production area.</p> |
| Unk | <p>5. <u>Prevent direct contact of confined animals with surface waters. [40 CFR 122.42(e)(1)(iv)]</u></p> <p>The NMP was not provided to the inspection team for review. The inspection team did not observe surface waters flowing through the production area.</p> |
| Unk | <p>6. <u>Ensure proper disposal of chemicals and other contaminants. [40 CFR 122.42(e)(1)(v)]</u></p> <p>The NMP was not provided to the inspection team for review.</p> |
| Unk | <p>7. <u>Identify site-specific conservation practices to control runoff of pollutants. [40 CFR 122.42(e)(1)(vi)]</u></p> <p>The NMP was not provided to the inspection team for review. According to the facility representative, the facility maintains a 50–75-foot vegetated buffer between land application sites and the Yakima River.</p> |
| Unk | <p>8. <u>Identify protocols for manure, process wastewater, and soil sampling and testing. [40 CFR 122.42(e)(1)(vii)]</u></p> <p>The NMP was not provided to the inspection team for review. According to the facility representatives, manure and soils samples are collected in the spring and fall of each year for laboratory analysis.</p> |

Nutrient Management Plan (NMP) continued

Unk 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 NMP was not provided to the inspection team for review.

Unk 10. Identify specific records that will be maintained to document the implementation and management of the minimum NMP elements (#2-#9 above).

The NMP was not provided to the inspection team for review.

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

Unk 11. Application rates are calculated as required by 40 CFR 412.4(c)(2).

Unk 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 NMP was not provided to the inspection team for review. According to the facility representatives, manure and soils samples are collected in the spring and fall of each year for laboratory analysis.

Unk 13. Includes periodic inspection of land application equipment? [40 CFR 412.4(c)(4)]

The NMP was not provided to the inspection team for review.

Unk 14. Includes 100-foot setback or 35-foot vegetated buffer, or approved alternative? [40 CFR 412.4(c)(5)]

The NMP was not provided to the inspection team for review. According to the facility representative, the facility maintains a 50–75-foot vegetated buffer between land application sites and the Yakima River.

Monitoring, Documentation and Recordkeeping

Does the facility maintain the following records?

N/A 15. The completed permit application? [40 CFR 412.37(b)]

Riverview Ranch is an unpermitted CAFO.

No 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)]

The facility representative did not provide documentation of the current design of the manure storage structures. According to the facility representative, Lagoon 2 has a liner certification. However, liner certifications for the impoundments were not provided to the inspection team.

N/A 17. The date, time, and estimated volume of any overflow? [40 CFR 412.37(b)(6)]

According to the facility representative, no overflows from the facility's impoundments had ever been observed or recorded.

Monitoring, Documentation and Recordkeeping (continued)

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

No 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

According to the facility representative, the facility maintains documentation of liquid manure/slurry transferred to third parties, but this documentation was not provided to the inspection team. The facility representative stated that the facility provides a manure nutrient analysis to the third party only if requested.

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

No 19. Documentation of daily and weekly visual inspections of the production area, including:

No a. Weekly inspection of stormwater diversions, waste storage structures, and process wastewater channeling devices? [40 CFR 412.37(b)(1)]

No b. Daily inspection of water lines? [40 CFR 412.37(b)(1)]

According to the facility representative, they perform daily inspections of cattle drinking water lines; however, these inspections are not documented.

No c. Weekly inspection of impoundments and tanks? [40 CFR 412.37(b)(1)]

According to the facility representative, they perform inspections of lagoons and pits; however, these inspections are not documented.

No 20. Weekly records of the depth of manure and process wastewater in liquid impoundments and terminal tanks? [40 CFR 412.37(b)(2)]

The lagoons and pits did not contain depth markers and the facility was not maintaining records of the depth of manure and process wastewater in these impoundments.

N/A 21. Documentation of actions taken to correct deficiencies found as a result of production area inspections? [40 CFR 412.37(b)(3)]

Yes 22. Documentation of mortalities management? [40 CFR 412.37(b)(4)]

The facility representative stated that they maintain records documenting all animal mortalities. However, the inspectors did not observe these records.

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

No 23. Expected crop yields? [40 CFR 412.37(c)(1)]

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

Monitoring, Documentation and Recordkeeping (continued)

- No 25. Weather conditions at the time of, and for 24 hours prior to and following, land application? [40 CFR 412.37(c)(3)]
According to the facility representative, they maintain records of weather at the time of land application, but not prior to and following land application.
- No 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. The facility did not provide the NMP, therefore any sample collection methodology contained in the NMP was not reviewed. The facility representative provided soil analyses and a liquid manure analysis in a follow-up email on 9/13/2024. The soil test results include the analytical methods used; however, the liquid manure test results do not specify the analytical methods used.
- Yes 27. Results from manure, process wastewater, and soil analyses? [40 CFR 412.37(c)(5)]
The inspectors requested these records at the time of the inspection and the facility representative provided soil analyses and a liquid manure analysis in a follow-up email on 9/13/2024. The inspectors observed test results for liquid manure samples received on 11/8/2023, and for soil samples dated 10/31/2022, 5/26/2023, 10/16/2023, and 5/13/2024.
- Unk 28. Manure and process wastewater application rates determined in accordance with the technical standards? [40 CFR 412.37(c)(6)]
- Unk 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)]
- No 30. Total amount of N and P actually applied to each land application site, including calculations? [40 CFR 412.37(c)(8)]
The land application records received by the inspection team did not include calculations of the total N and P applied to Wheeler Pivot.
- Yes 31. Method used to apply manure and process wastewater? [40 CFR 412.37(c)(9)]
According to the facility representative, they use a tanker or drag hose with a splash plate.
- No 32. Date(s) of manure application equipment inspections for leaks? [40 CFR 412.37(c)(10)]
According to the facility representative, land application equipment is checked for leaks; however, the facility does not maintain documentation of these inspections.

Land Application Sites

Yes 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: 3 fields (~ 250 acres)
- Irrigation type(s): Pivot
- Furrow/flood irrigation sites – what is fate of applied wastewater and tailwater? N/A

Unk 34. Was manure/wastewater applied in accordance with the procedures and protocols identified in the NMP? If no, describe: The information in the table below is for crop year 2023, based on records provided by the facility following the inspection. The inspection team was not provided a copy of the NMP and therefore cannot determine whether actual application rates exceeded planned rates. The inspection team based the information included below on application records provided by the facility representative, liquid manure test results, and an estimation of the acreage of Wheeler Pivot based on Google Earth aerial imagery.

Field ID: Wheeler Pivot Acreage: ~120 (based on Google Earth imagery) Crop: Hay and corn		Phosphorus Index: Not determined		Calculations based on: ☒ N or ☐ P	
		Calculated ^b		Applied	
		Gal. or tons/acre	PAN lbs/acre	Gal. or tons/acre	PAN lbs/acre
Rates of application:	Liquid/Slurry	-	-	14,187	142
	Solid	-	-	37	Not determined
	Commercial	-	-	-	-
Total Lbs. N or P that may be applied and that were applied:			Not provided		Not determined

Additional Land application Site Comments

- The inspection team requested the NMP from the facility after the inspection, but the NMP was not provided to the inspection team before the final report was submitted to the EPA. Therefore, the methodology used to determine planned application rates could not be reviewed to compare with the actual land application rates in crop year 2023.
- Based on the Northwest Agricultural Consultants soil test results and Nutrient Range Guidelines included on the test results, soil phosphorus is listed as “High” in all results; soil nitrogen is listed as “Low” or “Medium”.
- On September 13, 2024, the facility representative provided application records for Wheeler Pivot showing manure applied (listed as “tons” applied) on 5/24/2023, 10/12/2023, and 10/13/2023. The 5/24/2023 application records show that 485 tons of manure were applied. The October 2023 application records show that a total of 3,919 tons were applied over two days. The inspection team assumes that these records show the amount of solid manure applied.
- The facility also provided an invoice from Northwest Liquid Transport 1, Inc. showing 1,702,464 gallons applied to Wheeler Pivot on 11/20/2023-11/22/2023. The inspection team assumes that this is the amount of liquid manure applied.
- The inspection team received liquid manure test results for a manure sample dated as received by the laboratory on 11/8/2023. These results do not specify the source (i.e., impoundment) of the

sample. Based on these results, the amount of 'N' in the liquid manure applied was 10.0 lb/1,000 gal.

- The inspection team did not receive solid manure test results. Therefore, the inspection team cannot determine the lbs N/acre applied via solid manure.
- Based on the amount of liquid manure applied, and the soil test results provided, the manure nitrogen application rate appears reasonable; however, the inspection team does not have solid manure nutrient analyses, nor any field risk assessment information to be able to make a determination of whether the facility is applying manure at agronomic rates.

Production Area35. List impoundments (attach additional sheet(s), if needed)

Impoundment ID	Wastewater Type	Wastewater Source(s)	Pumping level¹	Wastewater below pumping level?²	Max. recorded level	Date of max. recorded level
Lagoon 1	☒ process generated ☒ runoff	Lagoon 2	N/A	N/A	N/A	N/A
Lagoon 2	☒ process generated ☒ runoff	Settling Pit, Lagoon 1	N/A	N/A	N/A	N/A
Milking Parlor Pit	☒ process generated ☐ runoff	Milking parlor	N/A	N/A	N/A	N/A
West Silage Pit	☒ process generated ☒ runoff	Silage storage area	N/A	N/A	N/A	N/A
East Silage Pit	☒ process generated ☒ runoff	Silage storage area	N/A	N/A	N/A	N/A
Pen 8 Pit	☐ process generated ☒ runoff	Pen 8 and eastern cattle pens	N/A	N/A	N/A	N/A
Pen 4 Pit	☐ process generated ☒ runoff	Pen 4 and adjacent cattle pens	N/A	N/A	N/A	N/A
Pen 3 Scrape Pit	☐ process generated ☒ runoff	Pen 3 and adjacent cattle pens	N/A	N/A	N/A	N/A
Settling Pit	☒ process generated ☒ runoff	Pen 3 Scrape Pit, Milking Parlor Pit	N/A	N/A	N/A	N/A
Dry Cow Pit	☐ process generated ☒ runoff	Dry cow pen	N/A	N/A	N/A	N/A

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.

Production Area (continued)

36. Impoundment(s) collect all runoff from:

Yes Animal confinement areas?³

The facility has four manure pits located along the northern end of the cattle pens. Runoff from the pens and manure scraped from the feed alleys flow or are scraped into these pits. However, there was one area, located west of the Settling Pit, that the facility representative pointed out as a low spot which captures runoff from the adjacent cattle pens (Photographs 28-29).

No Manure storage areas?⁴

According to the facility representative, manure is either stored in the cattle pens, or removed and stored in an area in the northeast portion of the production area, or hauled directly to a field to be stockpiled in the corner of a pivot. The inspection team observed the manure storage area in the northeast portion of the production area. Runoff from this area would flow south towards the cattle pens. According to the facility representative, runoff from this manure storage area collected in a low spot directly north of the Pen 4 pit. The inspection team did not observe any stockpiling of manure at the Dairy Pivot or Wheeler's Pivot.

Yes Raw material storage areas?⁵

Yes Waste containment areas?⁶

N/A Egg washing or egg processing facility?

No Mortality storage, handling, treatment or disposal area?

The inspection team observed mortalities in the temporary storage location near the northern production area boundary (Photograph 13). Based on the local topography, it does not appear to the inspectors that runoff would enter an impoundment.

N/A Other?

No 37. Was manure or wastewater observed in a waterway? If yes, describe: N/A

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)).

Production Area (continued)

- No 38. 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 (NMP storage capacity information could not be evaluated as the inspection team did not receive the NMP before the report was submitted to EPA).
- Yes 39. Confined animals do not have direct contact with waters of the United States? [40 CFR 122.42(e)(1)(iv)]
- No 40. Clean water is diverted from the production area? [40 CFR 122.42(e)(1)(iii)]
- The inspection team did not observe any clean water diversions during the site tour. Based on the flat topography of the production area and surrounding areas, it did not appear that clean water needs to be diverted from the production area.
- Yes 41. 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. 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 42. 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 impoundments did not contain depth markers.
- Yes 43. 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)]
- The inspection team observed mortalities in the temporary storage location near the northern production area boundary (Photograph 13), northeast of Lagoon 2.

Additional Production Area Comments:

Runoff from the silage storage area drains to the east or west silage pits (Photographs 2, and 6-8).

The inspection team observed residual silage in the ditch along Vance Road (Photographs 3 and 4). The ditch was dry at the time of the inspection and appeared to dead-end at the corner of the production area. It did not appear to be connected to a WOTUS; however, the inspection team recommended the facility keep residual silage out of the ditch to prevent any process-generated wastewater from leaving the production area.

According to the facility representative, in general, runoff from the cattle pens flows north towards pits located at the northern corners of the pens. These pits include the Pen 8 Pit, Pen 4 Pit, Pen 3 Scrape Pit, the Scrape Pit, and another pit located near the northeast corner of Pen 3.

Milking parlor wash water is collected in the Milking Parlor Pit (Photographs 34), where it is then pumped to the concrete Settling Pit (Photographs 25 and 27). From the Settling Pit, wastewater is pumped into Lagoon 2 (Photographs 15-18).

Immediately west of the Settling Pit, the inspection team observed a low spot and an excavator positioned in this area (Photographs 28-29). According to the facility representative, the facility was planning to make this area into a new impoundment.

Wastewater can flow between Lagoon 1 (Photographs 19-20) and Lagoon 2 via an overflow pipe.

The inspection team observed heavy vegetation on multiple impoundments, including the east silage pit, Lagoon 1, and Lagoon 2 (Photographs 6-8, 15, and 19-20). The east silage pit had a plastic liner and the vegetation was growing on top of or through the liner (Photographs 6-8). The inspection team also observed a tear in the plastic liner in the Pen 4 Pit (Photograph 22). Following the inspection, on September 13, 2024, the facility representative emailed the inspection team the photos in Attachment 1 below of impoundments where vegetation had been removed.

Inspector: Chris Pardo Date: 12/18/2024

Site Map



Figure 1. Aerial image of the Riverview Ranch production area.



Figure 2. Aerial image of the Riverview Ranch production area and nearby land application sites.

Photo Log



Photograph 1. View looking east along the southern production area boundary and Vance Road from a point near the facility driveway.



Photograph 2. View looking northeast at the concrete-lined West Silage Pit.



Photograph 3. View looking west along the southern production area boundary and Vance Road, from a point near the southeast corner of the production area.



Photograph 4. View looking west along the southern production area boundary and Vance Road, from the southeast corner of the production area.



Photograph 5. View looking south along Ferry Rd from the southeast corner of the production area. The inspection team observed that the swale next to Ferry Rd, which contained stormwater runoff, was upgradient of the production area, and it did not appear to be connected to the ditch along the north side of Vance Road.



Photograph 6. View looking northwest of the East Silage Pit located at the southeast corner of the production area. The East Silage Pit was lined with a plastic liner, however, the inspection team heavy vegetation growing within the pit.



Photograph 7. View looking north along the eastern production area boundary from the southeast corner of the site. The East Silage Pit shown in [Photograph 6](#) is visible at the left side of the photograph.



Photograph 8. Additional view looking west across the East Silage Pit shown in [Photographs 6 & 7](#). Note the heavy vegetation growing within the pit.



Photograph 9. View looking south along the eastern production area boundary from the northeast corner of the cattle pens. The buildings visible at the left side of the photograph are on adjacent property and are not part of the production area.



Photograph 10. View looking southwest across the Pen 8 Pit.



Photograph 11. View looking south across the Pen 8 Pit and the Pen 8 feed alley.



Photograph 12. View looking east towards the facility's lime storage area located near the northeast corner of the cattle pens.



Photograph 13. View looking northeast at the temporary mortality storage area.



Photograph 14. View looking south towards the solid manure storage area and cattle pens. This photograph was taken from the same spot as [Photograph 13](#).



Photograph 15. View looking southwest across Lagoon 2. Note the heavy vegetation growing on the embankments.



Photograph 16. View looking south, along the eastern edge of Lagoon 2.



Photograph 17. View looking west across the southern portion of Lagoon 2. The PVC pipe (circled) is the overflow pipe between Lagoon 1 and Lagoon 2.



Photograph 18. View looking west towards the pipe (circled) that conveys wastewater from the Settling Pit to Lagoon 2.



Photograph 19. View looking southwest across Lagoon 1. Note the heavy vegetation growing on the embankments.



Photograph 20. View looking west along the northern edge of Lagoon 1. Note the heavy vegetation growing on the embankments.



Photograph 21. View looking east across the Pen 4 Pit.



Photograph 22. View looking south along the western edge of the Pen 4 Pit and the Pen 4 feed alley. The inspection team observed a tear in the plastic liner (circled).



Photograph 23. View looking south at the Pen 3 Scrape Pit, located at the northeast corner of Pen 3.



Photograph 24. View looking north across the Scrape Pit, located at the northwest corner of Pen 3.



Photograph 25. View looking northwest across the Settling Pit.



Photograph 26. View looking north at the PVC pipe (circled), also shown in [Photograph 18](#), that conveys wastewater from the Settling Pit to Lagoon 2.



Photograph 27. View looking northeast across the Settling Pit. The PVC pipe shown in the photograph conveys wastewater from the Milk Parlor Pit to the Settling Pit.



Photograph 28. View looking southwest at the low spot located west of the Settling Pit.



Photograph 29. Additional view looking southwest of the low spot shown in [Photograph 27](#).



Photograph 30. View looking east along the northern production area boundary from the northwest corner of the site.



Photograph 31. View looking south at the Dry Cow Pit.



Photograph 32. View looking east at the runoff conveyance from the cow pens to the Dry Cow Pit shown in [Photograph 30](#).



Photograph 33. View looking north along the western production area boundary from a point near the southwest corner of the cattle pens.



Photograph 34. View looking northeast at the Milk Parlor Pit.



Photograph 35. View looking northwest at the silage storage area located between the Dairy Pivot and Wheeler's Pivot.



Photograph 36. View looking northeast along the Wheeler's Pivot northern field boundary. The Yakima River is located approximately 1800 feet north of the field boundary behind the trees in the background.



Photograph 37. View looking southwest along the Wheeler's Pivot field boundary. The Yakima River is located approximately 1800 feet north of the field boundary.

Attachment 1. Photos Provided by the Facility Following the Inspection

On September 13, 2024, the facility representative Scott Smeenk emailed the inspection team the following photos of impoundments where vegetation had been removed.



Photograph 1. View of the East Silage Pit. Note the absence of vegetation compared to the photographs taken during the inspection site tour.



Photograph 2. View of Lagoon 2. Note the absence of vegetation compared to the photographs taken during the inspection site tour.



Photograph 3. View of Lagoon 1. Note the absence of vegetation compared to the photographs taken during the inspection site tour.