

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	03/26/2024	
Media Program:	Water	
Regulatory Program(s)	NPDES CAFO	
Company Name:	Cobb Vantress, LLC	
Facility Name:	Three Springs Farm (OKU002201)	
Facility Physical Location:	17804 E. 606 Road	
(city, state, zip code)	Rose, OK 74364	
Mailing address:	17804 E. 606 Road	
(city, state, zip code)	Rose, OK 74364	
County/Parish:	Cherokee	
Facility Phone Number	918-868-3005	
Facility Contact:	Ken Hanson	Assoc. Director of Production
	ken.hanson@cobbgenetics.com	
FRS Number:	110028146851	
Identification/Permit Number:	OKU002201	
Media Identifier Number:		
NAICS:	1123	
SIC:	0259	
Personnel participating in inspection:		
Ken Hanson	Cobb Vantress	Assoc. Dir. of Production
Thomas Wiley	Cobb Vantress	EHS Manager
Scott Hanan	Cobb Vantress	EHS
Nick Clark	Cobb Vantress	EHS
Keith Smith	ODAFF	Inspector Supervisor
Paul Juarez	EPA R6	Inspector
Juan Ibarra	EPA R6	Inspector
EPA Lead Inspector Signature/Date	<i>Juan Ibarra</i>	05/09/2024
	Juan Ibarra	Date
Supervisor Signature/Date	<i>Anthony Loston</i>	05/09/2024
	Anthony Loston	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Juan Ibarra and Paul Juarez arrived at the Cobb Vantress, LLC/Three Springs Farm at 0910 on 03/26/2024 for an announced inspection. The reason for the inspection announcement was due to recent and on-going cases of poultry Avian Influenza and biosecurity concerns in the States of Arkansas and Missouri. We were accompanied by the Oklahoma Department of Agriculture, Food, and Forestry (ODAFF) inspector supervisor Keith Smith. We met with Cobb Vantress/Three Springs Farm representatives Ken Hanson/Associate Director of Production, Thomas Wiley/EHS Manager, Scott Hanan/EHS, and Nick Clark/EHS at the Opening Conference. I presented my credentials to Mr. Hanson and informed him that this was an EPA inspection to determine compliance with the facility's ODAFF CAFO License (No. 1371) and the Concentrated Animal Feeding Operations (CAFO) requirements as found in the Clean Water Act (CWA). The scope of the inspection was a full compliance evaluation and includes an evaluation of the facility's compliance with its ODAFF operating permit requirements and nutrient management plan (NMP).

The sequence for the inspection was an introductory overview conducted during the opening conference, followed by a review of the NMP paperwork. The inspectors were then required to follow the farm's biosecurity procedures of showering-in and wearing clothing provided by Cobb Vantress, including boots and jackets. The inspectors and facility staff (listed above) then toured the site in facility provided vehicles, leaving our vehicles in the large common employee parking area.

FACILITY DESCRIPTION

The ODAFF CAFO license was issued to Three Springs Farm, but it also includes an adjacent farm called Sweetwater Farm. Both farms are chicken poultry farms which were evaluated for compliance and operation under their permit's license, as well as for the requirements of their nutrient management plan (NMP). The license allows for a maximum of 140,000 chickens total at both farms, and the Three Springs farm is considered a Grade A Pedigree farm. The chickens at Three Springs are the grandparent (first generation genetic stock) chickens that produce the eggs that make the hens (second generation genetic stock) that will then produce the eggs which either become broilers (third generation genetic stock) or are shipped out to other farms as eggs. Hence, there is an egg washing and incubation facility on-site which produces process wastewater that is stored within a single process wastewater lagoon located at the Three Springs Farm. Additionally, there are three in-series domestic wastewater lagoons located in the same area as the process wastewater lagoon. All process wastewater generated at Three Springs Farm is land applied onto an adjacent 3.3 acres, while the domestic wastewater from the restrooms and showers are land applied onto an adjacent 11 acres of land. The Sweetwater Farm's domestic sewage is stored within a single total retention lagoon (no irrigation occurs out of this lagoon).

Section II – OBSERVATIONS

Lagoon Management:

The farm's synthetically lined lagoons only contain domestic and process wastewater generated by the egg washing operation. The only other water entering the lagoons comes from the direct rainfall that includes the 7.1" rain from the 25-year/24-hour rain event. The process wastewater lagoon at Three Springs Farm also had a pole marker showing 4'3" of wastewater depth and 2'1" of freeboard. The three in-series domestic wastewater lagoons at Three Springs Farm had a pole maker in the third lagoon, showing 4'8" of wastewater depth and 3'4" of freeboard. The Sweetwater Farm lagoon did not have the required pole marker but appeared to have sufficient freeboard. All lagoons had well vegetated and maintained outside embankments.

Nutrient Management Plan Review:

The facility has a Nutrient Management Plan (NMP) that was updated on 2/9/2024 by the consultant (Sheri Herron of Herron Soil Interpretations, LLC). A review of the nutrient application showed that the facility was keeping proper records for the amounts of nitrogen and phosphorus applied to the land application sites at the Three Springs Farm for both the process and domestic wastewater lagoons. They were also tracking the required annual soil and wastewater nutrient concentrations. Recommended amounts of nitrogen and phosphorus applications were provided by Oklahoma State University (OSU) for a grass crop. However, as total annual nutrient application was based on the tons of grass harvested per acre, and at this farm the grass was cut but never bailed/harvested (it is left on the ground and not removed), it was not possible to determine if the amount of nutrients applied (nitrogen was the limiting nutrient) may have exceeded crop nutrient requirements. The farm must harvest and weigh the grass crop after each cutting to determine tons/acre/year to ensure that all the nitrogen and phosphorus applied was utilized by the crop.

The farm does not land apply any poultry litter. The litter is given away for use by other farmers. Additionally, for a third party to receive the litter, ODAFF requires that the recipient be licensed as a Poultry Waste Applicator, which includes annual reporting requirements.

Production Area Housekeeping and Best Management Practices:

The Three Springs farm has 48 poultry houses, and the Sweetwater farm has 9 poultry houses. During a tour of the production area by the inspectors, I noted that the facility is very well maintained. There was no spilled litter outside of the poultry houses nor spilled feed beneath the feed silos. Additionally, no chicken feather accumulations were seen anywhere outside of the poultry houses beneath the ventilation fans. The grounds were noticeably clean, including the areas where the incinerators were located. Most mortality management is handled by incineration, but the facility also uses a rendering company out of Russellville, AR.

Section III – AREAS OF CONCERN

The Three Springs and Sweetwater farms were very well operated and maintained, with good implementation of the best management practices contained within the NMP. There were, however, two areas of concern that should be addressed.

1) The grass on the land application fields was cut but never bailed/harvested. The cut grass is left on the ground and not removed, so it was not possible to determine if the amount of nutrients applied (nitrogen was the limiting nutrient) may have exceeded crop nutrient requirements. The farm must harvest and weigh the grass crop after each cutting to determine tons/acre/year to ensure that all the nitrogen and phosphorus applied was utilized by the crop as recommended by OSU. This requirement is found in the ODAFF CAFO regulations per 35:17-4-12 Animal Waste Management Plans (AWMPs) part (b)(3) that states in part that the AWMP shall include "All calculations and all factors and assumptions used in determining land application rates, acreage, and crops for both solid and liquid animal wastes."

2) The Sweetwater Farm lagoon did not have the required pole marker as required by the ODAFF CAFO regulation 35:17-4-9 (h)(C)(vi) which states that "A permanent measuring device shall be maintained in the wastewater retention structure to show the volume required to contain the 25-year, 24-hour rainfall event."

EPA Region 6 and ODAFF inspectors (listed above in Purpose of the inspection) conducted a closing conference at the Cobb Vantress Three Springs Farm at 1200 on 3/28/2024. During the closing conference, I reviewed the two Areas of Concern noted during the inspection.

Section IV – FOLLOW UP

None

Section V – LIST OF APPENDICES

There are no appendices attached to this report. No photographs were taken due to the absence of significant areas of concern during the inspection.