



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

**Report Title:** Clean Water Act Compliance Inspection Report  
**Inspection Date(s):** 09/22/2021  
**Regulatory Program(s):** National Pollutant Discharge Elimination System (NPDES)  
**Type of Activity:** CAFO  
**Site/Facility Name:** Casa Grande Farm  
**Permittee(s):** Casa Grande Farm  
**Site/Facility Operator:** Casa Grande Farm  
**Site/Facility Address:** 3667 Freedomtown Road  
 Crisfield, MD 21817  
**Latitude:** 37.982616 **Longitude:** -75.830881  
**County/Parish:** Somerset  
**Permit Number:** MDG01-0053  
**NAICS Code:** 112320 **SIC:** 0251  
**Unique Project #:** 3E21WN033A

**Site/Facility Representative(s):** **Point of Contact**  
 Tracy Chen   
 Phone: (609)601-0183 Email: Tracychan1@msn.com  
 Enter the name and title of the site/facility rep present for the inspection

**EPA Inspectors:**  
 Peter Gold  
 Phone: (215) 814-5236 Email: Gold.Peter@epa.gov  
 Shane McAleer  
 Phone: (215) 814-5456 Email: McAleer.Shane@epa.gov

**State/Local Inspectors:**  
 Richard Stewart, Maryland Department of the Environment (MDE)  
 Phone: (443) 630-9562 Email: Richard.Stewart@maryland.gov  
 John Sullivan III, Maryland Department of the Environment (MDE)  
 Phone: (410) 537-3314 Email: John.Sullivan1@maryland.gov

---

**Report Preparer** Report preparer name/( & mail code if EPA Inspector) **Date**  
**Signature/Date** Preparers' address

---

**Supervisor** Enter Supervisor's Name and Mail Code **Date**  
**Signature/Date**

**Table of Contents**

I. Introduction ..... 3  
    A. Inspection Opening Conference ..... 3  
    B. Weather and Precipitation Conditions..... 4  
    C. Summary of the Site/Facility..... 4  
II. Site/Facility Activity ..... 4  
III. Observations ..... 5  
IV. Records Review ..... 6  
V. Closing Conference..... 6

**List of Attachments**

- Attachment A: Maryland NPDES General Permit for Animal Feeding Operations
- Attachment B: Photo Log
- Attachment C: Checklist

**I. Introduction**

On September 22, 2021, an inspection team composed of staff from the U.S. Environmental Protection Agency (“EPA”) Region III (hereinafter, “EPA Inspection Team”) conducted a CAFO Inspection of the Casa Grande Farm site (hereinafter, “the site”). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the site’s coverage under National Pollutant Discharge Elimination System (NPDES) Permit No. MDG01 (hereinafter, the “Permit”) and applicable State and Federal regulations. NPDES Permit MDG01 is Maryland’s General Discharge Permit for Animal Feeding Operations.

**A. Inspection Opening Conference**

The EPA Inspection Team arrived at the site at est. 10:00 a.m. for the inspection. Inspectors met with the following site representatives:

**Table 1: Inspection Attendee List**

Name	Affiliation	Telephone	Email
<b>EPA Region III Inspectors and Contractors</b>			
Peter Gold	EPA Region III	(215) 814-5236	<a href="mailto:Gold.Peter@epa.gov">Gold.Peter@epa.gov</a>
Shane McAleer	EPA Region III	(215) 814-5616	<a href="mailto:McAleer.Shane@epa.gov">McAleer.Shane@epa.gov</a>
<b>Site/Facility Representatives</b>			
Tracy Chan	Casa Grande Farm	(609) 601-0183	<a href="mailto:Tracychan1@msn.com">Tracychan1@msn.com</a>
<b>State or County Representatives</b>			
Richard Stewart	MDE	(443) 630-9562	<a href="mailto:Richard.Stewart@maryland.gov">Richard.Stewart@maryland.gov</a>
John Sullivan III	MDE	(410) 537-3314	<a href="mailto:John.Sullivan1@maryland.gov">John.Sullivan1@maryland.gov</a>

Peter Gold and Shane McAleer displayed their credentials to Tracy Chan at the outset of the inspection, and explained the purpose of the inspection was to observe the site compliance with its Permit. A copy of the Permit is provided in Appendix A. The EPA Inspection Team informed Tracy Chan that any information that the Facility deemed to be confidential business information (“CBI”) should be identified to EPA representatives during the inspection and it would be handled as CBI according to EPA’s CBI procedures. There were 3 Amick representatives who refused to provide their names for the inspection.

**B. Weather and Precipitation Conditions**

During the inspection, weather was mix of cloud and rain. The nearest National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in the Table 2 below:

**Table 2. Precipitation Data**

Station Name	Date	Precipitation Amount (inches) <sup>1</sup>
Crisfield 0.9 ENE, MD US US1MDSS0018	09/17/2021	Trace
Crisfield 0.9 ENE, MD US US1MDSS0018	09/18/2021	0.0
Crisfield 0.9 ENE, MD US US1MDSS0018	09/19/2021	0.0
Crisfield 0.9 ENE, MD US US1MDSS0018	09/20/2021	0.0
Crisfield 0.9 ENE, MD US US1MDSS0018	09/21/2021	0.0
Crisfield 0.9 ENE, MD US US1MDSS0018	09/22/2021	0.0

**C. Summary of the Site/Facility**

The site is a poultry farm located in Crisfield, Maryland. The site was composed of seven poultry houses, two active poultry waste storage structures (PWSSs), two active composters, two former PWSSs that are used for storage and two former composters that are no longer used.

**II. Site/Facility Activity**

At the time of the inspection the facility was permitted for 190,000 birds per flock. The facility was on an 11-week flock cycle with birds being housed for 8-weeks and 3-weeks between flocks. Windrowing was occurring three times per year in houses between flocks, and a total cleanout was being conducted once every four years with the most recent cleanout conducted in 2021. A cakeout was conducted in 2019 and 2020. A fire in April of 2021 consumed Poultry House #1 and representatives of Maryland Department of the Environment (MDE) were on site discussing the permits and control measures needed for the construction of the new poultry house. This inspection did not evaluate the construction activities occurring on site, as MDE was taking the lead. Poultry Houses 2 & 3 are each 40 feet wide and 500 feet long and have a capacity of 23,000 birds, Poultry Houses 4 & 5 are each 50 feet wide and 500 feet long with a capacity of 28,500 birds. Poultry House #6 is the largest house and measures 60 feet in width and 560 feet in length and has a capacity of 38,600 birds. Poultry House #7 which is located across the street from the five active houses is the smallest house measuring 40 feet in width and 400 feet in length and has a capacity of 18,400 bird. The observations from the inspection are described in detail below in the Observations section. Photographs were taken during the inspection by Shane McAleer and are provided in Attachment B.

<sup>1</sup> Source: NOAA National Climatic Data Center (<http://www.ncdc.noaa.gov/>).

### **III. Observations**

The following section summarizes the EPA Inspection Team's observations relative to the Permit requirements and the Nutrient Management Plan (NMP) and Comprehensive Nutrient Management Plan (CNMP).

#### **Animal Waste Containment**

General Requirement: Permit Part IV.B.1 "Ensure adequate storage capacity. Design, construct, operate, and maintain the production area and all animal waste storage structures to contain all animal removed from the animal confinement areas, and, in the case of liquid manure, including any runoff or direct precipitation from a 25-year, 24-hour storm. Store dry manure in a way that prevents polluted runoff."

##### **Observation #1**

At the time of the inspection a small amount of litter and/or compost was spilling out from the composter beyond the roofed area (photograph DSCN2657 of the photo log). This was addressed and rectified by site representatives during the inspection.

Litter from inside of the poultry house appeared to be deposited on the ground just outside of a wall fan of Poultry House #7. The ground in the area around this wall fan was discolored and was documented in photograph DSCN2727 of the photo log.

#### **Pollutant/Chemical Handling**

General Requirement: Permit Part IV.B.5 Chemical Handling. "Ensure that chemicals and other contaminants handled on-site are not disposed in any manure, litter, process wastewater, or storm water storage treatment system unless specifically designed to treat such chemicals and other contaminants...."

##### **Observation #2**

A sealed paint can was observed outside a site structure where it could be exposed to storm water (photograph DSCN 2608). Facility representatives moved the can to a covered storage structure during the inspection.

A potential leak of a hydraulic line on equipment was observed in former PWSSs #3, and there was significant staining of the dirt floor in the area around the equipment. The stained area was under the roof of the structure, but the equipment could potentially leak when being moved to poultry houses. The staining is documented in photographs DSCN2696 and DSCN2697.

#### **Diversion of Clean Water**

General Requirement: Permit Part IV.B.3 "Divert clean water, as appropriate, from production area to keep it separate from process wastewater. For CAFOs, conduct daily inspections of water lines, including drinking and cooling water lines, on all days the CAFO is in operation. Correct any deficiencies found as a result of the inspections as soon as possible, and maintain a log of deficiencies found and corrected."

**Observation #3:**

At the time of the inspection a potential water leak was observed in the outdoor portion of the evaporator cooling system of Poultry House #4. There was standing water beneath the PVC piping that was used to collect the condensate. Photographs DSCN2616 and DSCN2617 document this condition. The facility did have documentation of their daily waterline inspections; the facility began conducting these inspections approximately one week before the EPA's inspection on September 14, 2021.

**IV. Records Review**

During the inspection, the EPA Inspection Team requested and/or reviewed all self-inspection reports, CNMP, NMP, litter export records and mortality records. MDE provided a copy of the CNMP shortly after the inspection.

**V. Closing Conference**

After the site walk, the EPA Inspection Team met with the site representatives for a closing conference. The EPA Inspection Team shared preliminary observations with the site representatives. The EPA Inspection Team reiterated to the site representatives that all preliminary observations discussed were not compliance determinations. Any preliminary observations shared were subject to further investigation by EPA upon the additional review of records and documentation. Additional observations may be contained in this inspection report that were not identified at the time of the closing conference after EPA reviewed additional materials following the inspection.

The inspection concluded at approximately 11:50 a.m.