



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/22/22	
Media Program:	Water	
Regulatory Program(s)	CAFO	
Company Name:	Morales Feedlots, Inc.	
Facility Name:	Morales Cattle Feedlot	
Facility Physical Location:	480 Private Road 7621 (29.1105, -98.9496)	
(city, state, zip code)	Devine, Texas 78016	
Mailing address:	PO Box 487	
(city, state, zip code)	Devine, Texas 78016	
County/Parish:	Medina	
Facility Phone Number	(830) 663-4441	
Facility Contact:	Ernie Morales	Owner
	Ernie@MoralesFeedlot.com	
FRS Number:	110021021080	
Identification/Permit Number:	TXG920533	
Media Identifier Number:	N/A	
NAICS:	112112	
SIC:	0211	
Personnel participating in inspection:		
Frank Rihn	Morales Cattle Feedlot	Employee
Lucas Bomar	EPA/6ECAD-WA	Inspector(lead)
Juan Ibarra	EPA/6ECAD-WA	Inspector
Anne-Marie Revenberg	TCEQ Region 13	Inspector
Ernie Morales	Morales Cattle Feedlot	Owner
EPA Lead Inspector Signature/Date		10/18/2022
	{Inspector name}	Date
Supervisor Signature/Date		
	{Supervisor name}	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors, Lucas Bomar and Juan Ibarra, arrived at Morales Cattle Feedlot at 9:31 a.m. on September 22nd, 2022, for an unannounced inspection. We were accompanied by Mrs. Anne-Marie Revenberg from TCEQ Region 13. We met with the owner, Mr. Ernie Morales, at the opening conference. I presented my credentials to Mr. Morales and informed him that this was an EPA inspection to determine the facility's compliance status with the requirements of the Clean Water Act (CWA) and the Texas Pollutant Discharge Elimination System (TPDES) Concentrated Animal Feeding Operation (CAFO) regulations stipulated within the facility's CAFO general permit. The scope of the inspection included a compliance evaluation of the facility's site operations, lagoon maintenance, nutrient management plan, and record keeping requirements of their permit. For biosecurity purposes, the inspectors wore over-boots and washed the vehicle after the inspection.

FACILITY DESCRIPTION

Morales Cattle Feedlot is permitted for 25,000 cattle. Currently Morales Cattle Feedlot is in the process of closing their facility. At the time of the inspection the facility was shipping out the last of their beef cattle. There were no beef cattle remaining on the facility during the site tour. All cattle had been kept in open lot pens. The facility was in the process of scraping out all the manure from the pens and processing the manure for compost. All open lot pens are graded and utilize drainage ditches to direct runoff. Runoff on the south end of the feedlot runs to a concrete settling pit that can flow to retention control structure (RCS) 1 if needed. The facility usually pumps from this settling pit directly for land application. Runoff on the northern end of the feedlot is directed to RCS 2. RCS 2 is also used for land application. There is a berm around the facility perimeter to contain and direct all runoff into one of the RCSs and to prevent the runoff from leaving the production area. In total, the dairy has two RCS and one solid settling structure that are part of the Nutrient Management Plan (NMP).

Both RCS are clay lined, fully fenced, free from erosion and contain depth markers. Both RCS have adequate freeboard. There is no evidence of any discharges at the time of the inspection. At the time of the inspection, RCS 1 was completely dry and cleared-out of manure and RCS 2 was still utilized and free of solids. RCS 1 has a capacity of 23.54 acre-feet and RCS 2 has a capacity of 22.62 acre-feet. The structures are designed to handle the 25-year/24-hour rainfall event of 7.6 inches. The clay liner certification was done by Mr. John Mercer, P.E. on 1/11/1994. The most recent 5-year evaluation of the RCS was done by Mr. Benjamin Weinheimer, P.E. on 02/25/2020.

Both manure and wastewater are applied on-site. The facility owns one dewatering pump and uses a big gun for land application. The feedlot has four land management units (LMUs) totaling 1585 acres that can be used for land application. These include: LMU 1, LMU 2, LMU 3, and LMU 4. LMU 1 has 410 acres, LMU 2 has 375 acres, LMU 3 has 400 acres, and LMU 4 has 400 acres. No manure or wastewater is transferred off-site to third parties. All mortalities are composted on-site and run through a screened tumbler.

The LMUs are cropped with coastal bermuda. This is used for grazing and hay. The last of the feed is in the process of being sold to Luckey Custom Feedlot. Feed commodities are stored in either silos or in covered barns. Hay is kept in a covered barn.

Section II – OBSERVATIONS

The feedlot is well managed and organized. The records for facility inspections and maintenance were complete and in good order. Land application records were copied for further review. Currently the facility is taking the appropriate measures to properly close.

Section III – AREAS OF CONCERN

No areas of concern were found during the inspection.

EPA Region 6 inspector, Lucas Bomar, conducted a closing conference for the inspection with Mr. Morales via telephone at approximately 12:00 p.m. on September 22nd, 2022. During the closing conference, the inspector informed Mr. Morales that there were no inspection concerns.

Section IV – FOLLOW UP

EPA R6 Inspectors, Lucas Bomar and Juan Ibarra, met with the Texas Cattle Feeders Association (TCFA) on 10/04/2022 at 1:30 p.m. to get clarification on the land application records that were copied during the inspection. TCFA was able to give further information on the field numbering and explain the discrepancies with the calculations. The facility was applying below the agronomic rate, however, the records did not reflect that information. TCFA will have the records amended to show the correct application rate.

Section V – LIST OF APPENDICES

Appendix 1 – Inspection Photo Log – Three photos taken 09/22/2022

Appendix 1

Inspection Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 1

Location: Morales Cattle Feedlot		
City: Devine	County: Medina	State: Texas



Photo File Name: P9220027.JPG

Date of Photo: 09/22/2022

Time of Photo: 11:38 a.m.

Photographer: Juan Ibarra

Description: This photo shows the concrete settling pit that receives runoff from the pens to the north and the manure composting area to the south. The manure composting area is shown in the background. RCS 1 is directly south. View is to the south.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 2

Location: Morales Cattle Feedlot		
City: Devine	County: Medina	State: Texas



Photo File Name: P9220028.JPG

Date of Photo: 09/22/2022

Time of Photo: 11:43 a.m.

Photographer: Juan Ibarra

Description: This photo shows RCS 1 with the pole marker visible in the center. This RCS has been cleared out in preparation for closure and contained no visible waste at the time of the inspection. View is to the southwest.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Photo No. 3

Location: Morales Cattle Feedlot		
City: Devine	County: Medina	State: Texas



Photo File Name: P9220029.JPG

Date of Photo: 09/22/2022

Time of Photo: 11:55 a.m.

Photographer: Juan Ibarra

Description: This picture shows RCS 2 with pole marker visible and the feed mill, commodity storage, and office in the background. Drainage channels are coming from the production areas directing flow to the RCS. View is to the southwest.