



**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	2/18/20		
Media:	Water		
Regulatory Program(s)	NPDES		
Company Name:	N/A		
Facility Name:	Ogle Cattle Co.		
Facility Physical Location:	312 Cattle Pen Rd,		
(city, state, zip code)	Bowie, TX 76230		
Mailing address:	PO Box 1449		
(city, state, zip code)	Bowie, TX, 76230		
County/Parish:	Montague		
Facility Contact:	Owner: Chris Ogle	Phone: 940-872-2250	
	Consultant email: manureisgood@yahoo.com		
	Facility email: oglecattle@aol.com		
FRS Number:	N/A		
Identification/Permit Number:	TXG920157		
Media Number:	N/A		
NAICS:	112111		
SIC:	0211		
Personnel participating in inspection:			
Collin Martin	6ECD-WA	Inspector	214-665-8380
Juan Ibarra	6ECD-WA	Inspector	214-665-8493
Jack Arias	6ECD-WA	Inspector	214-665-6672
Chelsey Sherwood	6ECD-WA	Inspector	254-233-9945
EPA Lead Inspector Signature/Date			
	{Inspector name}		Date
Supervisor Signature/Date			4/3/2020
	{Supervisor name}		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Collin Martin, Juan Ibarra, Jack Arias, and Chelsey Sherwood arrived at Ogle Cattle Co. at 9:50 AM on 02/18/20 for an unannounced inspection. The owner of the facility, Larry Ogle, was not available at the time of the inspection, so we dealt directly with his son, Chris Ogle. I presented my credentials to Mr. Ogle as we informed him that this was an EPA inspection to determine the facility's compliance with the Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) Concentrated Animal Feeding Operation (CAFO) regulations and the facility's Texas Commission on Environmental Quality (TCEQ) Permit. This inspection was initiated in response to inspector reconnaissance which documented an overflow of RCS #1 on 2/6/20. The scope of the inspection was a Compliance Evaluation Inspection and included an evaluation of the facility's compliance with their TCEQ CAFO permit. Following the opening conference, we proceeded unaccompanied for the entirety of the inspection.

FACILITY DESCRIPTION

Ogle Cattle Co is a Large CAFO feedlot permitted to confine up to 2999 cattle. At the time of the inspection, according to Chris Ogle, the facility was confining approximately 1200 head of beef cattle. The cattle were housed in approximately 25 acres of open lots. The facility had one (1) Retention Control Structure (RCS) which was designed to receive process wastewater from the facility's production area. Wastewater pumped out of this RCS was used to irrigate three (3) Land Management Units (LMUs). These three (3) LMUs total 393 acres and are irrigated via a reel gun and risers. Commodities were stored in a barn.

Section II - OBSERVATIONS

Wastewater & Solids Conveyance

On the day of the inspection, we observed that the northeast corner of the open lot nearest RCS #1 was inadequately graded [Area Of Concern (AOC) 1]. This approximately 0.7-acre area was sloped in such a way that any process wastewater emanating from it would not be conveyed to RCS #1. Instead, this area appeared to slope toward the low area between RCS #1 and HWY 287 which had a direct connection to Brier Creek. Additionally, we observed a large pile of manure being stored in an area just north of RCS #1 (Photo #14). This area was graded such that it was not contained within the watershed of RCS #1 [AOC 2]. We also observed tall grass growing on top of this pile which was evidence of storage for greater than the 30 days of temporary storage allowed per TXG920157.

Retention Control Structures

On the day of the inspection we observed a discharge emanating from the northwestern corner of RCS #1 [AOC 3] (Photo #6). We followed the flowpath of this discharge until it reached Brier Creek (Photos #11-12). We collected two samples of this discharge which are explained in Discharge Sampling Results

below. Additionally, we observed that the pole marker was totally submerged at the time of the inspection [AOC 4] and that woody vegetation had taken root within the northern embankment of RCS #1 [AOC 5] (Photo #18).

Silage and Commodities Storage

On the day of our inspection I observed the facility's commodity storage to be adequate. Hay and commodities were being stored covered in a barn.

Records Review

On 3/2/2020, the facility's consultant emailed us digital copies of the facility's records. I reviewed these records and found them to be accurate and up to date. However, records must be made readily available during the course of an inspection. Weekly lagoon level reading records showed that RCS #1 was consistently above its pump-out mark beginning December 21st, 2019 (one (1) foot above) until February 18th, 2020 (five (5) feet above) [AOC 6]. According to the facility irrigation records, there was no attempt made to land-apply effluent to an LMU between 10/25/2019 and 2/21/2020 [AOC 7].

Discharge Sampling Results

Water Samples were taken at the point of discharge from RCS #1 and just upstream of the point in which wastewater entered Brier Creek. All samples were analyzed for the following parameters: E. Coli, Total Coliforms, Total Kjeldahl Nitrogen (TKN), Nitrate/Nitrite as N, Ammonia as N, and Total Phosphorus. These samples contained high nutrient loading and high fecal content. The lab's analytical results are contained within Appendix 2 and summarized in the table below.

	E. Coli,	Total Coliforms	Total Kjeldahl Nitrogen (TKN),	Nitrate/Nitrite as N	Ammonia as N	Total Phosphorus
Lagoon Discharge	>24196 MPN/100mL	>24196 MPN/100mL	91.0 mg/L	ND mg/L	45.2 mg/L	27.8 mg/L
Brier Creek	>24196 MPN/100mL	>24196 MPN/100mL	58.5 mg/L	ND mg/L	27.1 mg/L	20.7 mg/L
Bacteria Blank	<1 MPN/100mL	<1 MPN/100mL	NA	NA	NA	NA

Section III – AREAS OF CONCERN

The following Areas of Concern were conveyed to facility's consultant, Noel Courts during the closing conference:

1. An area approximately 0.7 acres located in the northeast corner of the open lot nearest RCS #1 was not graded in a way that allowed for proper drainage to RCS #1 as required by TXG920157 Part III.A.6(c)(2).
2. Piles of manure were being stored uncovered adjacent to RCS #1. Per TXG920157 Part III.A.9(b) manure or sludge stored for more than 30 days must be stored within the drainage area of an RCS or stored in a manner (i.e. storage shed, bermed area, tarp covered area, etc.) that otherwise prevents contaminated storm water runoff from the storage area.
3. Process wastewater was discharging from the northwestern corner of RCS #1. Per TXG920157, the facility shall not discharge unless at least one of the criteria in Part III.A.5(3)(ii) is met.
4. The permanent pond marker in RCS #1 was completely submerged. Per TXG920157 Part III.A.10(c), permanent pond markers must be visible from the top of the embankment.
5. Small woody vegetation had taken root within the embankment of RCS #1. This vegetation will need to be removed to prevent the plant's root zone from intruding into the RCS liner per TXG920157 Part III.A.10(f)(3).
6. Weekly lagoon level readings showed that RCS #1 was above the pump-out mark for 60 consecutive days from 12/21/19 through 2/21/20. Per TXG920157 Part III.A.10(a), the normal operating wastewater level in the RCS shall be maintained in accordance with the design of the RCS and the permittee shall ensure that the required capacity in the RCS is available to contain rainfall and rainfall runoff from the design rainfall event.
7. No attempt was made to dewater in the event of imminent overflow as required by TXG920157 Part III.A.10(b)

Section IV – LIST OF APPENDICES

Appendix 1 – Photo Log – 18 photos taken 2/18/20 (Photos #1-18), 13 photos taken 2/6/20 (Photos #19-30) and 1 aerial image of significant photo locations

Appendix 2 – Pace Lab's analytical report of samples taken 2/18/20

Appendix 3 – Quality Assurance Project Plan

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 1.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken from the northern berm of RCS #1 facing west. Note the impression evident in the berm. The facility's consultant informed us that they believed them to be wild hog walk-line tracks.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 2.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken from base of the northern berm of RCS #1 facing south. Note the impression evident in the berm. The facility's consultant informed us that they believed them to be wild hog walk-line tracks.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 3.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken from the top of the northern berm of RCS #1 facing east. Note the impression which appears to run from the interior of RCS #1 directly to Brier Creek. The facility's consultant informed us that they believed them to be wild hog walk-line tracks.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 4.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken at the point where the impression meets the RCS #1 discharge conveyance.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 5.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken facing southeast toward the point at which the discharge from RCS #1 meets Brier Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 6 sample one.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken facing west across the discharge as it exited RCS #1 The sample containers in the photo were sitting just to the right of where they were collected.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 7 dup.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken facing east across the flowpath of the discharge.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 7.jpg

Date of Photo: 2/18/2020

Time of Photo: 9:20 AM

Photographer: Chelsey Sherwood

Description: This photo was taken facing southeast across the flowpath of the discharge from RCS #1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 9.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken facing southeast across the flowpath of the discharge from RCS #1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 10.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken facing the discharge from RCS #1. Note the ripples in the discharge which were evidence of active flow.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 11 sample two.jpg

Date of Photo: 2/18/2020

Time of Photo: 9:21 AM

Photographer: Chelsey Sherwood

Description: This photo was taken facing southeast towards Brier Creek at the second sampling location. The sample containers in the photo were sitting just to the right of where they were collected.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 12.jpg

Date of Photo: 2/18/2020

Time of Photo: 9:21 AM

Photographer: Chelsey Sherwood

Description: This photo was taken facing south across Brier Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 13.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken facing north towards Brier Creek as it passed under Hwy 287.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 14.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken facing west towards the manure pile that was stored outside of the watershed of RCS #1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 15.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken facing northwest. Note the lack of a berm below the gate. Any process wastewater which emanated from this 0.7-acre area would have flowed toward this low point and towards Brier Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 18.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken facing southwest toward the stomped-out pasture feeding area. Stomped out areas surrounding feed and watering areas are permitted, but as a best management practice, feed and water troughs should be rotated to minimize the size of the affected area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: 22.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken facing northwest toward the southernmost open lot on the west side of the production area. The very low berm present at this corner would likely be inadequate to channel and contain the 25 yr/24 hr rain event toward the RCS. Because of this, runoff from this area would likely go to the bar ditch and thence Brier Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: lagoon.jpg

Date of Photo: 2/18/2020

Photographer: Chelsey Sherwood

Description: This photo was taken facing south across RCS #1. Note the woody vegetation rooted within the berm.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic1-64783DC4-46AA-4FDA-AADF-F7A83F262A96.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge from the HWY 287 access road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic2_B5B5654B-23A3-4C33-AEA8-FF981BF50B6D.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge from the HWY 287 access road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic3_1B42063B-AEA3-45F1-B587-4E23C2C50E5B.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge from the HWY 287 access road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic4_2EAD272B-CF33-41A0-BC85-C47A0173A302.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge from the HWY 287 access road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic5_F8CF5E93-019F-456A-9F4F-FD33136F91DE.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge from the HWY 287 access road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic6_104B1882-AC25-4E98-8771-58842B3A4ED2.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge from the HWY 287 access road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic7_9B670862-5D32-4B00-B1F9-F8AB0ED6FBB4.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge from the HWY 287 access road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic8_4E26F438-65A5-49D7-A8C8-38EC90C0CEEA.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge from the HWY 287 access road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic9_8018C242-63F5-4883-89BF-326A4CD0406C.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge from the HWY 287 access road.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic10_71D459BF-A6DF-459B-8306-F56E32D306F8.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge by the property's northern fence line.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic12_D00F49F5-1F45-4806-B570-B895E2D8EBC0.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge by the property's northern fence line.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Photo File Name: Pic13_1BDDECD3-7E55-461B-B32F-F6E7FBBB244C.jpeg

Date of Photo: 2/6/2020

Photographer: Carl Wills

Description: Photo taken of the discharge by the property's northern fence line.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location: Ogle Cattle Co. 312 Cattle Pen Rd.		
City: Bowie	County/Parish: Montague	State: Texas



Appendix 2

Sample Results

February 27, 2020

Collin Martin
EPA Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202

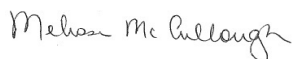
RE: Project: Ogle Cattle Co
Pace Project No.: 75125858

Dear Collin Martin:

Enclosed are the analytical results for sample(s) received by the laboratory on February 18, 2020. The results relate only to the samples included in this report. Results reported herein conform to the most current, applicable TNI/NELAC standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Melissa McCullough
melissa.mccullough@pacelabs.com
(972)727-1123
Project Manager

Enclosures



REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: Ogle Cattle Co

Pace Project No.: 75125858

Pace Analytical Services Kansas

9608 Loiret Boulevard, Lenexa, KS 66219

Missouri Inorganic Drinking Water Certification #: 10090

Arkansas Drinking Water

Arkansas Certification #: 19-016-0

Arkansas Drinking Water

Illinois Certification #: 004455

Iowa Certification #: 118

Kansas/NELAP Certification #: E-10116

Louisiana Certification #: 03055

Nevada Certification #: KS000212020-2

Oklahoma Certification #: 9205/9935

Florida: Cert E871149 SEKS WET

Texas Certification #: T104704407-19-12

Utah Certification #: KS000212018-8

Illinois Certification #: 004592

Kansas Field Laboratory Accreditation: # E-92587

Missouri SEKS Micro Certification: 10070

Pace Analytical Services Dallas

400 West Bethany Dr Suite 190, Allen, TX 75013

EPA# TX00074

Texas T104704232-19-29

Florida Certification #: E871118

Texas Certification #: T104704232-18-26

Kansas Certification #: E-10388

Arkansas Certification #: 88-0647

Oklahoma Certification #: 8727

Louisiana Certification #: 30686

Iowa Certification #: 408

Pace Analytical Services Fort Worth

2657 Gravel Dr, Fort Worth, Texas 76118

Texas Certification #: T104704232-18-24

Texas T104704232-19-29

EPA# TX00074

REPORT OF LABORATORY ANALYSIS

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SAMPLE SUMMARY

Project: Ogle Cattle Co

Pace Project No.: 75125858

Lab ID	Sample ID	Matrix	Date Collected	Date Received
75125858001	Lagoon Disch 6-301803	Water	02/18/20 10:29	02/18/20 15:10
75125858002	Lagoon Disch 6-410913	Water	02/18/20 12:14	02/18/20 15:10
75125858003	Lagoon Disch 6-301804	Water	02/18/20 10:29	02/18/20 15:10
75125858004	Brier Creek 6-301802	Water	02/18/20 10:47	02/18/20 15:10
75125858005	Brier Creek 6-410914	Water	02/18/20 10:47	02/18/20 15:10

REPORT OF LABORATORY ANALYSIS

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SAMPLE ANALYTE COUNT

Project: Ogle Cattle Co

Pace Project No.: 75125858

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
75125858001	Lagoon Disch 6-301803	SM 9223, Colilert	DHH	2	PASI-FTW
75125858002	Lagoon Disch 6-410913	SM 9223, Colilert	DHH	2	PASI-FTW
75125858003	Lagoon Disch 6-301804	EPA 351.2	AJS	1	PASI-K
		EPA 353.2	LVH	1	PASI-D
		SM 4500-NH3 H	LVH	1	PASI-D
		SM 4500-P E	RMB	1	PASI-D
75125858004	Brier Creek 6-301802	SM 9223, Colilert	DHH	2	PASI-FTW
75125858005	Brier Creek 6-410914	EPA 351.2	AJS	1	PASI-K
		EPA 353.2	LVH	1	PASI-D
		SM 4500-NH3 H	LVH	1	PASI-D
		SM 4500-P E	RMB	1	PASI-D

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: Ogle Cattle Co

Pace Project No.: 75125858

Sample: Lagoon Disch 6-301803		Lab ID: 75125858001	Collected: 02/18/20 10:29	Received: 02/18/20 15:10	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
MBIO Total Ecoli		Analytical Method: SM 9223, Colilert Preparation Method: SM 9223, Colilert						
Total Coliforms	> 24196	MPN/100mL	10.0	10	02/18/20 16:55	02/19/20 17:06		
Escherichia coli (E.coli)	> 24196	MPN/100mL	10.0	10	02/18/20 16:55	02/19/20 17:06		

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: Ogle Cattle Co

Pace Project No.: 75125858

Sample: Lagoon Disch 6-410913		Lab ID: 75125858002	Collected: 02/18/20 12:14	Received: 02/18/20 15:10	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
MBIO Total Ecoli		Analytical Method: SM 9223, Colilert Preparation Method: SM 9223, Colilert						
Total Coliforms	<1	MPN/100mL	1.0	1	02/18/20 16:55	02/19/20 17:07		
Escherichia coli (E.coli)	<1	MPN/100mL	1.0	1	02/18/20 16:55	02/19/20 17:07		

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: Ogle Cattle Co

Pace Project No.: 75125858

Sample: Lagoon Disch 6-301804	Lab ID: 75125858003	Collected: 02/18/20 10:29			Received: 02/18/20 15:10		Matrix: Water	
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
351.2 Total Kjeldahl Nitrogen	Analytical Method: EPA 351.2 Preparation Method: EPA 351.2							
Nitrogen, Kjeldahl, Total	91.0	mg/L	5.0	5	02/21/20 08:57	02/24/20 13:45	7727-37-9	
353.2 Nitrogen, NO2/NO3 pres	Analytical Method: EPA 353.2							
Nitrogen, NO2 plus NO3	ND	mg/L	0.050	1		02/25/20 11:58		
4500 Ammonia Water	Analytical Method: SM 4500-NH3 H							
Nitrogen, Ammonia	45.2	mg/L	0.50	5		02/21/20 14:52	7664-41-7	
SM4500P-E, Total Phosphorus	Analytical Method: SM 4500-P E Preparation Method: SM4500-P B							
Phosphorus	27.8	mg/L	2.5	50	02/20/20 14:29	02/20/20 17:03	7723-14-0	

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: Ogle Cattle Co

Pace Project No.: 75125858

Sample: Brier Creek 6-301802		Lab ID: 75125858004	Collected: 02/18/20 10:47	Received: 02/18/20 15:10	Matrix: Water			
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
MBIO Total Ecoli		Analytical Method: SM 9223, Colilert Preparation Method: SM 9223, Colilert						
Total Coliforms	>24196	MPN/100mL	10.0	10	02/18/20 16:55	02/19/20 17:06		
Escherichia coli (E.coli)	>24196	MPN/100mL	10.0	10	02/18/20 16:55	02/19/20 17:06		

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ANALYTICAL RESULTS

Project: Ogle Cattle Co

Pace Project No.: 75125858

Sample: Brier Creek 6-410914	Lab ID: 75125858005	Collected: 02/18/20 10:47	Received: 02/18/20 15:10	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
351.2 Total Kjeldahl Nitrogen	Analytical Method: EPA 351.2 Preparation Method: EPA 351.2							
Nitrogen, Kjeldahl, Total	58.5	mg/L	2.5	5	02/21/20 08:57	02/24/20 13:46	7727-37-9	
353.2 Nitrogen, NO2/NO3 pres	Analytical Method: EPA 353.2							
Nitrogen, NO2 plus NO3	ND	mg/L	0.050	1		02/25/20 12:00		
4500 Ammonia Water	Analytical Method: SM 4500-NH3 H							
Nitrogen, Ammonia	27.1	mg/L	0.50	5		02/21/20 14:53	7664-41-7	
SM4500P-E, Total Phosphorus	Analytical Method: SM 4500-P E Preparation Method: SM4500-P B							
Phosphorus	20.7	mg/L	1.2	25	02/20/20 14:29	02/20/20 16:51	7723-14-0	

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QUALITY CONTROL DATA

Project: Ogle Cattle Co

Pace Project No.: 75125858

QC Batch:	135459	Analysis Method:	SM 9223, Colilert
QC Batch Method:	SM 9223, Colilert	Analysis Description:	9223B MBIO Total Ecoli
Associated Lab Samples:	75125858001, 75125858002, 75125858004		

METHOD BLANK: 616671 Matrix: Water

Associated Lab Samples: 75125858001, 75125858002, 75125858004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Escherichia coli (E.coli)	MPN/100mL	<1	1.0	02/19/20 17:06	
Total Coliforms	MPN/100mL	<1	1.0	02/19/20 17:06	

SAMPLE DUPLICATE: 616672

Parameter	Units	75125847001 Result	Dup Result	RPD	Max RPD	Qualifiers
Escherichia coli (E.coli)	MPN/100mL	<1	<1			
Total Coliforms	MPN/100mL	93.3	83.9			

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QUALITY CONTROL DATA

Project: Ogle Cattle Co
 Pace Project No.: 75125858

QC Batch: 639572 Analysis Method: EPA 351.2
 QC Batch Method: EPA 351.2 Analysis Description: 351.2 TKN
 Associated Lab Samples: 75125858003, 75125858005

METHOD BLANK: 2600347 Matrix: Water
 Associated Lab Samples: 75125858003, 75125858005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Nitrogen, Kjeldahl, Total	mg/L	ND	0.50	02/24/20 11:59	

LABORATORY CONTROL SAMPLE: 2600348

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Nitrogen, Kjeldahl, Total	mg/L	5	5.2	103	90-110	

MATRIX SPIKE SAMPLE: 2600349

Parameter	Units	60328827006 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Nitrogen, Kjeldahl, Total	mg/L	0.62	5	6.0	107	90-110	

MATRIX SPIKE SAMPLE: 2600351

Parameter	Units	60328859001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Nitrogen, Kjeldahl, Total	mg/L	45.1	10	61.7	166	90-110	M1

SAMPLE DUPLICATE: 2600350

Parameter	Units	60328830002 Result	Dup Result	RPD	Max RPD	Qualifiers
Nitrogen, Kjeldahl, Total	mg/L	10.4	10.4	0	10	

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QUALITY CONTROL DATA

Project: Ogle Cattle Co

Pace Project No.: 75125858

QC Batch:	135882	Analysis Method:	EPA 353.2
QC Batch Method:	EPA 353.2	Analysis Description:	353.2 Nitrate + Nitrite, pres.
Associated Lab Samples:	75125858003, 75125858005		

METHOD BLANK: 618928 Matrix: Water

Associated Lab Samples: 75125858003, 75125858005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Nitrogen, NO2 plus NO3	mg/L	ND	0.050	02/25/20 11:52	

LABORATORY CONTROL SAMPLE: 618929

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Nitrogen, NO2 plus NO3	mg/L	2.5	2.5	101	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 618930 618931

Parameter	Units	75125630002 Result	MS	MSD	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
			Spike Conc.	Spike Conc.								
Nitrogen, NO2 plus NO3	mg/L	0.052	2.5	2.5	2.4	2.5	93	97	90-110	4	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 618932 618933

Parameter	Units	75126083001 Result	MS	MSD	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
			Spike Conc.	Spike Conc.								
Nitrogen, NO2 plus NO3	mg/L	0.14	2.5	2.5	2.6	2.6	99	99	90-110	0	20	

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QUALITY CONTROL DATA

Project: Ogle Cattle Co

Pace Project No.: 75125858

QC Batch: 135701 Analysis Method: SM 4500-NH3 H
 QC Batch Method: SM 4500-NH3 H Analysis Description: 4500 Ammonia
 Associated Lab Samples: 75125858003, 75125858005

METHOD BLANK: 617923 Matrix: Water

Associated Lab Samples: 75125858003, 75125858005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Nitrogen, Ammonia	mg/L	ND	0.10	02/21/20 12:40	

LABORATORY CONTROL SAMPLE: 617924

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Nitrogen, Ammonia	mg/L	5	5.0	101	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 617925 617926

Parameter	Units	75125634001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Nitrogen, Ammonia	mg/L	ND	5	5	4.9	4.9	98	97	80-120	1	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 617927 617928

Parameter	Units	75125672001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Nitrogen, Ammonia	mg/L	ND	5	5	5.0	4.9	98	97	80-120	0	20	

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QUALITY CONTROL DATA

Project: Ogle Cattle Co

Pace Project No.: 75125858

QC Batch:	135602	Analysis Method:	SM 4500-P E
QC Batch Method:	SM4500-P B	Analysis Description:	SM4500P-E, Total Phosphorus
Associated Lab Samples:	75125858003, 75125858005		

METHOD BLANK: 617432 Matrix: Water

Associated Lab Samples: 75125858003, 75125858005

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Phosphorus	mg/L	ND	0.050	02/20/20 16:15	

LABORATORY CONTROL SAMPLE: 617433

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Phosphorus	mg/L	0.5	0.51	102	80-120	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 617488 617489

Parameter	Units	20142302002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Phosphorus	mg/L	0.78	0.5	0.5	1.2	1.3	91	96	80-120	2	20	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 617490 617491

Parameter	Units	20142299002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Phosphorus	mg/L	0.31	0.5	0.5	0.78	0.78	94	95	80-120	1	20	

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QUALIFIERS

Project: Ogle Cattle Co
Pace Project No.: 75125858

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.
ND - Not Detected at or above adjusted reporting limit.
TNTC - Too Numerous To Count
J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.
MDL - Adjusted Method Detection Limit.
PQL - Practical Quantitation Limit.
RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.
S - Surrogate
1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.
Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.
LCS(D) - Laboratory Control Sample (Duplicate)
MS(D) - Matrix Spike (Duplicate)
DUP - Sample Duplicate
RPD - Relative Percent Difference
NC - Not Calculable.
SG - Silica Gel - Clean-Up
U - Indicates the compound was analyzed for, but not detected.
N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.
Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.
TNI - The Nelac Institute

LABORATORIES

PASI-D Pace Analytical Services - Dallas
PASI-FTW Pace Analytical Services - Fort Worth
PASI-K Pace Analytical Services - Kansas City

ANALYTE QUALIFIERS

M1 Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: Ogle Cattle Co

Pace Project No.: 75125858

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
75125858001	Lagoon Disch 6-301803	SM 9223, Colilert	135459	SM 9223, Colilert	135460
75125858002	Lagoon Disch 6-410913	SM 9223, Colilert	135459	SM 9223, Colilert	135460
75125858004	Brier Creek 6-301802	SM 9223, Colilert	135459	SM 9223, Colilert	135460
75125858003	Lagoon Disch 6-301804	EPA 351.2	639572	EPA 351.2	640006
75125858005	Brier Creek 6-410914	EPA 351.2	639572	EPA 351.2	640006
75125858003	Lagoon Disch 6-301804	EPA 353.2	135882		
75125858005	Brier Creek 6-410914	EPA 353.2	135882		
75125858003	Lagoon Disch 6-301804	SM 4500-NH3 H	135701		
75125858005	Brier Creek 6-410914	SM 4500-NH3 H	135701		
75125858003	Lagoon Disch 6-301804	SM4500-P B	135602	SM 4500-P E	135671
75125858005	Brier Creek 6-410914	SM4500-P B	135602	SM 4500-P E	135671

REPORT OF LABORATORY ANALYSIS

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	Document Name: Sample Condition Upon Receipt	Document Revised: 01/03/20 Page 1 of 1
	Document No.: F-DAL-C-001-rev.12	Issuing Authority: Pace Dallas Quality Office

Sample Condition Upon Receipt

☐ Dallas ☒ Ft Worth ☐ Corpus CI

WO#: 75125858

Client Name: EPA Project Work order: _____Courier: FedEX ☐ UPS ☐ USPS ☐ Client ☐ LSO ☐ PACE ☐ Other: _____

Tracking #: _____

Custody Seal on Cooler/Box: Yes ☐ No ☒ Packing Material: Bubble Wrap/Bags ☐ Foam ☐ None ☒ Other ☐Received on ice: Yes ☒ No ☐ Type of Ice: Wet ☒ Blue ☐Thermometer Used: IR-12 Cooler Temp °C: 6.1 (Recorded) -0.3 (Correction Factor) 5.8 (Actual)

Temperature should be above freezing to 6°C

Triage Person: DHH Date: 02.18.20

Chain of Custody relinquished	Yes ☒ No ☐
Sampler name & signature on COC	Yes ☒ No ☐
Short HT analyses (<72 hrs)	Yes ☒ No ☐

Login Person: DHH Date: 02.18.20

Sufficient Volume received	Yes ☒ No ☐
Correct Container used	Yes ☒ No ☐
Container Intact	Yes ☒ No ☐
Sample pH Acceptable pH Strips: <u>159061</u> Residual Chlorine Present Cl Strips: _____ Sulfide Present Lead Acetate Strips: _____	Yes ☒ No ☐ NA ☐ Yes ☐ No ☐ NA ☒ Yes ☐ No ☐ NA ☒ <i>IL volume received - half of volume split to sub out for TKN. Already preserved by client.</i>
Are soil samples (volatiles, TPH) received in 5035A Kits (not applicable to TCLP VOA or PST Program TPH)	Yes ☐ No ☐ NA ☒
Unpreserved 5035A soil frozen within 48 hrs	Yes ☐ No ☐ NA ☒
Headspace in VOA (>6mm)	Yes ☐ No ☐ NA ☒
Project sampled in USDA Regulated Area: State Sampled: <u>TX</u>	Yes ☒ No ☐
Non-Conformance(s):	Yes ☐ No ☒ <i>*Client request to identify samples by tag numbers in remarks section of COC.</i>

Labeling Person (if different than log-in): _____ Date: _____

PROJ. NO.	PROJECT NAME	NO. OF CONTAINERS	REMARKS
2-18-20	1029	X	Disc 2-18-20 1029
2-18-20	1029	X	Disc 2-18-20 1029
2-18-20	1047	X	Disc 2-18-20 1047
2-18-20	1047	X	Disc 2-18-20 1047
W0#: 75125858 PM: MLM Due Date: 02/25/20 CLIENT: EPA Region 6			
2-18-20	1510	X	Disc 2-18-20 1510
2-19-20	0720	X	Disc 2-19-20 0720
2-19-20	0858	X	Disc 2-19-20 0858
Relinquished by: (Signature) Date / Time Received by: (Signature) Date / Time Relinquished by: (Signature) Date / Time Received by: (Signature) Date / Time Relinquished by: (Signature) Date / Time Received by: (Signature) Date / Time			
Remarks: Cell: 817 888 5441			

of 18

**Distribution: White Accompanies Shipment; Pink to Coordinator Field Files;
Green to Report; Yellow Returns with Warrant**

EPA 7500-53
(11/96)

6-08113

Appendix 3

Quality Assurance Project Plan

6EN QUALITY ASSURANCE PROJECT PLAN

Montague County, TX CAFOs

Feedlot and Livestock Auction in Montague County, Texas

Project Identifier: Feedlot and Livestock Auction in Montague County, TX - CAFO Sampling Inspections

Prepared by:

Juan Ibarra and Carl Wills

6ECD-WA

Prepared for:



U.S. Environmental Protection Agency
Region 6
Compliance Assurance and Enforcement Division (6EN)
1445 Ross Avenue
Dallas, TX 75202-2733

February 14, 2020

SECTION A – PROJECT MANAGEMENT

A.1 Title of Plan and Approval Quality Assurance Project Plan

Montague County, TX CAFOs

Prepared by:



Juan Ibarra and Carl Wills, (6ECD-WA)

Date: 02/14/2020

Approvals:



Collin Martin, Project Lead, (6ECD-WA)

Date: 2/14/20



Esteban Herrera, Section Chief, (6ECD-WA)

Date: 02/14/2020

Paul James, EPA R6 Quality Assurance Officer

Date: _____

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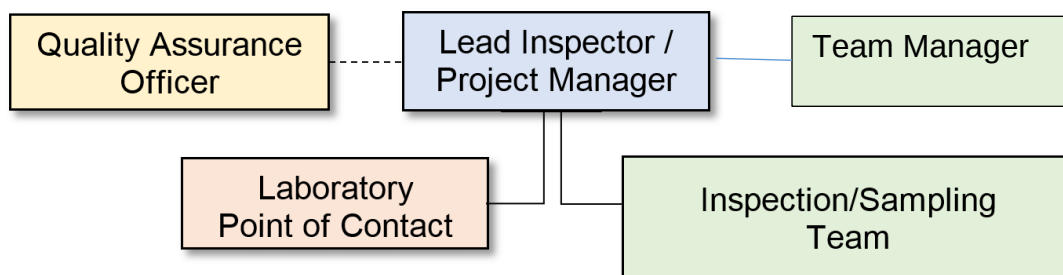
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A.3 A.4 Project Organization and Distribution List

The individuals participating in the project and their specific roles and responsibilities are shown below. These individuals will receive copies of the approved Quality Assurance Project Plan (QAPP) and subsequent revisions:

Table A.1 Roles & Responsibilities/Distribution List

Individual(s) Assigned:	Responsible for:	Authorized to:
Collin Martin EPA, Region 6 214-665-8380	Lead Inspector / Project Manager	Project Decisions, Lead and Assist Team Member(s), Collect and Assess Data
Paul James EPA, Region 6 214-665-6445	Quality Assurance Officer	Review and Approve QAPP
Melissa McCollough Pace Analytical 2657 Gravel Dr. Ft Worth, TX 76118 972-727-1123 817-335-1186	Laboratory Point of Contact / Project Manager	Water samples Lab coordination for scheduling, analyses, validation, and deliverables.
Barbara McCray-OSU SWFAL 048 Agricultural Hall Stillwater, OK 74078 Phone: 405-744-6630 FAX: 405-744-9575	Laboratory Point of Contact / Project Manager	Soil samples Lab coordination for scheduling, analyses, validation, and deliverables
Juan Ibarra EPA, Region 6 214-665-8380	Inspection/Sampling Team Member(s)	Inspect / Sample / Collect Data
Jack Arias EPA, Region 6 214-665-8154		
Chelsey Sherwood EPA, Region 6 214-665-6452		
Esteban Herrera, Section Chief, (6EN-WC)	Team Manager	Oversee Overall Project

Figure A.1 Project Organization Chart

For current 6EN Organization Chart, click on the following link:

<http://region6a.epa.gov/intranet/org/6en.pdf>

A.5 Problem Definition and Background

Problem(s) to be resolved, decision(s) to be made and/or hypothesis to be tested:

The objective of the inspection is to clearly understand and document each Confined Animal Feeding Operation's (CAFO) waste management practices and implementation of their Nutrient Management Plan (if applicable). If a discharge of liquid waste or contaminated storm water run-off to a waterway is observed, it will be sampled and submitted for analysis. Streams or ponds at a facility may also be sampled. The number of water samples taken during each inspection will be based on site specific conditions encountered at the time of the inspection. During the inspection, water bodies on and nearby the facility should be examined for their characteristics in order to define waters of the United States.

If unlawful discharges of pollutants under Section 301(a) of the Act, 33 U.S.C. § 1311(a) or other permit violations are documented, appropriate orders for corrective action will be issued.

Historical & background information:

CAFOs in Montague County (including a Livestock Auction), Texas are suspected contributors of pathogen (E. coli and other bacteria) and nutrient contamination to waters. Many streams and rivers in these areas are impacted for bacteria and are listed on the State's 303 (d) list. Potentially impacted waterways include Brier Creek and Lake Amon G. Carter which serves as a drinking water source for 801 people in Montague County.

Prior inspections conducted by EPA and TCEQ have shown that CAFO operations can mismanage lagoon wastewaters, manure storage, and land application in such a way as to discharge nutrient and pathogen laden wastewater runoff to Waters of the U.S. Other CAFO operations have been found to have unpermitted discharges from cattle pens, employee mobile home site septic lines, land application sites, and various production areas located at the sites. Other general issues common to CAFOs include manure and wastewater misapplication (violation of the best management practices), mortality mismanagement, the lack of adequate lagoon storage facilities, and unpermitted discharges from the production areas. These CAFO waste mismanagement issues can result in off-site discharges with elevated concentrations of bacteria and nutrients, such as phosphorus and nitrogen (NO_3 and NH_4). Other problems include inadequately maintained or unutilized nutrient management plans, over application to the land application fields resulting in high nutrient levels, and a lack of recent soil analysis contributing to land application that does not meet the requirements of a nutrient management plan.

A.6 Project/Task Description

Samples of discharges from either a CAFO or Livestock Auction that reach a waterway will be taken as part of the facility inspections. The samples will be analyzed for the wastewater parameters, and possibly the soil parameters, listed in Table B. 4. The site names and locations are listed in Appendix A.

This QAPP has been prepared to address:

These samples will provide information to aid in determining if lagoon mismanagement, land application or any other operation at these facilities could or have adversely affected surface water quality within Waters of the U.S. The results of the sampling inspections may be used to compel producer compliance agreements and to provide compliance assistance by EPA, in cooperation with other State and Federal partners. The potential for future enforcement actions are also possible.

The work to be performed includes:

Objectives include the collection of wastewater discharge samples from cow pens, manure storage areas, production areas, lagoons, at the point that the discharge would potentially impact Waters of the U.S. with nutrients (i.e. nitrogen components and phosphorus) or bacteria. We may also collect contaminated runoff samples that enter a waterway from areas to which manure or wastewater has been improperly applied or improperly stored. Additionally, soil samples may be collected in areas where past discharge impact has been noted or at runoff discharge routes toward a waterway.

All enforcement wastewater samples will be hand delivered by EPA Region 6 staff to Pace Analytical Services (laboratory) Gravel Drive, Fort Worth, Texas. The laboratory

will provide proper storage, extraction, analysis, reporting and disposal of the samples provided. Soil samples will be shipped to the OSU laboratory for proper storage, extraction, analysis reporting and disposal of the samples provided.

List samples/measurements to be collected/made and data to be obtained:

All wastewater sample analyses will be performed per the requirements of 40 CFR 136, by Pace Analytical. Parameters to be analyzed include TKN, Ammonia-N, Nitrate/Nitrite-N, Total Nitrogen, Total Phosphorus and E. coli. During this EPA field mobilization, it is assumed that around 4 sample sets will be collected for laboratory analyses. Samples will be taken if an unpermitted discharge enters a stream, river or other waterway.

Soil samples will be collected based on field observations and records (e.g., visible staining, topography, release reports, other facility records and possible flowpath(s)). Soil samples will be collected from the surface (0.0 to 0.01-foot interval) with each being a grab of enough material to fill a soil sampling bag provided by the excepting laboratory for each location. Each grab sample be collected with a properly decontaminated stainless-steel spoon or an unused and individually wrapped plastic scoop with each only being used only for each grab sample location. Then each scoop or spoon full will be placed in the soil sampling until enough soil is collected to fill the bag. Additionally, the grab samples be collected both up- and down-gradient of the discharge location. Additional, locations will be determined in the field, if necessary.

All soil sample analyses will be performed for the analytes listed in Table B.1 per the requirements by methods established in the QA Plan for Oklahoma State University – Soil, Water and Forage Analytical Laboratory (SWFAL).

Special personnel or equipment requirements:

Equipment used for sample collection will be EPA sterile bacteria bottles and certified clean containers, or containers provided by the laboratory. Personnel will be Credentialed Inspectors that meet the training requirements for CAFO Inspections, and the Safety Requirements required for field inspection work.

Proposed work schedule:

0700-1600 during one work-week in February 2020.

Products to be produced:

Laboratory data that is supported by appropriate QA/QC which will be included into a facility inspection report.

A.7 Quality Objectives & Criteria

This inspection will be conducted under the authority of Section 308 of the Clean Water Act, and in accordance to 40 CFR 136 - Guidelines Establishing Test Procedures for the Analysis of Pollutants. The soil sample analyses will be performed per the requirements by methods established in the QA Plan for Oklahoma State University - SWFAL.

To support this requirement, EPA has developed a systematic planning process based on a graded approach for environmental decision making called the Data Quality Objectives (DQO) Process. The DQO Process is the Agency's preferred planning process and provides quality objectives and performance criteria based on the user's determination of tolerable error in the results. For details on the DQO Process and guidance on how and when it may be used, see the "[Guidance on Systematic Planning Using the Data Quality Objectives Process \(EPA QA/G-4\) \(EPA, February 2006\)](#)." This process has limited applicability to most enforcement inspection activities, since generally only Special Projects lend themselves to development of formal DQOs and defining of error limits, hypothesis testing, etc.

All data collected shall be in accordance with the appropriate EPA methodologies and protocols found in the appropriate regulatory guidance. The data shall be used to determine the following:

1. The potential water quality impact by a CAFO or Livestock Auction that is discharging process wastewater to a Water of the U.S.

The data must meet the approved method accuracy requirements such as those found in Industry-specific methods (40 CFR 136). The soil sample analyses will be performed per the requirements by methods established in the QA Plan for Oklahoma State University - SWFAL. All supporting QA/QC information shall be provided. The data may be used to support any future enforcement actions.

A.8 Special Training/Certification

Field personnel should have completed the Health and Safety 8-Hour Training that meets the 29 CFR 1910.120(e)(8) requirement of 8-hours of refresher training for hazardous waste site workers. Field personnel should also have completed the mandatory training under EPA Order 3500.1 for Inspectors required to hold Clean Water Act Inspector credentials. All non-credentialed personnel (e.g. inspectors in training) must meet the 29 CFR 1910.120(e)(8) requirements, and should be accompanied by credentialed personnel while inspecting/sampling at the facility/site. Inspection personnel must be familiar with and follow bio-security procedures.

Additional Special Training:

EPA course on Defensible Sampling and on the job training with senior inspectors.

A.9 Documents and Records

The records for this project will include miscellaneous correspondence, field notes, laboratory analytical reports, photo logs, and inspection reports. All laboratory reports will be submitted to the EPA Lead Inspector/Project Manager. Field notes will include observations about facility conditions at the site(s) where samples are collected. Any noteworthy deviation from the procedures specified in the QAPP will be recorded in the field activity logs. Laboratory analytical reports will be generated for all of the samples received by the laboratory. Each set of samples will include a chain of custody form signed by the samplers and the laboratory recipient. All samples will be delivered by an EPA Field Team Member.

The EPA Project Manager will disseminate copies of the QAPP to the people listed in the distribution list once it is approved. Any revisions to the QAPP will be numbered sequentially. It will be the responsibility of the EPA Project Manager to ensure that each person on the distribution list receives copies of any revisions.

All EPA records and documents from this project will be handled according to the following EPA Region 6 Field Activities Quality System Procedures:

- Records Management - R6PROC-003
- Management of Sampling and Environmental Data - R6PROC-004
- Field Documentation - R6PROC-005
- Field Equipment Inventory and Management - R6PROC-006
- Field Inspections and Investigations - R6PROC-007
- Field Activities Report Preparation and Distribution- R6PROC-008

The designated and/or contracted laboratory will manage the testing and original raw data from this project (both hard copy and electronic) in accordance with their established and accredited procedures. Any deviations from these procedures shall be approved by the EPA Project Manager before implementation.

SECTION B – DATA GENERATION & ACQUISITION

B.1 Sampling Process Design (Experimental Design)

Describe the experimental data generation or data collection design for the project:

The decision on whether or not to collect a sample will be contingent upon the following factors:

1. If the CAFO or Livestock Auction is discharging process wastewater from the production area (including the lagoon, milking parlor or land application site) into a creek, stream or river, then a sample will be taken of that discharge as it enters the waterway.

Because these samples are to be the result of an inspection and a one-time inspection/sampling event, a detail process design is not feasible or appropriate. However, the procedures to be followed from initiation to final report could be described as followed:

- Step 1: Lead Inspector assembles sampling equipment, chain of custody forms, pre-inspection plan, QAPP, sampling equipment/containers, ice chests, etc. and notifies laboratory to expect samples of a particular matrix for a specific analysis (see Table B.1).
- Step 2: Inspection Team proceeds to field for observation, sample collection if the situation warrants.
- Step 3: Inspection Team transports or ships sample(s) along with chain of custody forms to the laboratory for analytical testing.
- Step 4: Analytical results received from laboratory, inspector evaluates data, attaches to report, and takes any required action.

Types and number of samples required:

See Table B.1.

Sampling network design & rationale for design:

To be determined in the field.

Sampling locations & frequency of sampling:

To be determined in the field. Each CAFO site will be individually evaluated based on their operational condition at the time of the inspection. If the CAFO is discharging to a Waters of the U.S., then the Table B.1. Samples by Matrix will be initiated for those sites. The total number of samples is unknown until a determination is made in the field.

Sample matrices:

See Table B.1.

Classification of measurement parameters:

Critical – For environmental compliance and potential subsequent Enforcement Action.

Validation study information, for non-standard situations:

N/A: Standard validation

Table B.1 Samples by Matrix

Matrix	# of Matrix Samples	# of Field Blank**	# of Trip Blank*	# of Blind Duplicate	# of MS/MSD	Total # of Samples	Analysis <i>Example:</i> TCLP RCRA 8 Metals SW846 6010C/7471
Water	≤6	1	0	0	***	≤7	E coli
Water	≤6	0	0	0	***	≤6	TKN
Water	≤6	0	0	0	***	≤6	Ammonia - N
Water	≤6	0	0	0	***	≤6	Nitrate/Nitrite - N
Water	≤6	0	0	0	***	≤6	Total N
Water	≤6	0	0	0	***	≤6	Total Phosphorus
Soil	≤10	0	0	0	***	≤10	Routine Analysis
Soil	≤10	0	0	0	***	≤10	Ammonium - N
Soil	≤10	0	0	0	***	≤10	Organic Matter
Soil	≤10	0	0	0	***	≤10	Organic Carbon and Total Nitrogen

Note: *Trip blanks are for VOC analyses only. ** Field blanks column may also include rinsate blanks. Samples include one sample upgradient of the facility and one sample downgradient of the facility. *** Lab will perform MS/MSD as part of their required QA/QC.

Typical Analytical Method No.

Volatile Organics by GC/MS

SW846 - 8260B
EPA500 - 524.2
EPA600 - 624
CLP - VOA - MC
CLP - VOA - LC
Std. Methods 6210B
Std. Methods 6210C
Std. Methods 6210D

Volatile Organics by GC

SW-846 - 8021B
EPA500 - 502.2
EPA600 - 601
EPA600 - 602
Std. Methods 6220B
Std. Methods 6220C
Std. Methods 6230B
Std. Methods 6230C

Semi-Volatile Organics

by GC/MS

SW846 - 8270D
EPA500 - 525.2
EPA600 - 625
CLP - SVOA - MC
CLP - SVOA - LC
CLP - PEST - LC
Std. Methods 6410

PAH

SW846 - 8310 (HPLC)

Inorganic Analytes

SW- 846 7000 Series (AA)
SW- 846 6010C (ICP)
SW- 846 6020A (ICP-MS)
EPA 200 Series (AA)
EPA 200.7 (ICP)
EPA 200.8 (ICP-MS)
CLP Inorganic Method (ICP)
CLP Inorganic Method (AA)
Std Methods 3000 Series (AA)
Std. Method 3120 (ICP)

Herbicides

SW846 - 8151A
EPA 500 - 515.4
EPA 500 - 515.2
Std. Methods 6640

Pesticides & PCBs

SW846 - 8081B
SW846 - 8082A
EPA500 - 508
EPA600 - 608
CLP-PEST- MC
Std. Methods 6630

Std. Methods 6230D

B.2 Sampling Methods

Identify sample collection procedures:

Samples will be collected from the production area discharge point into the waterway. Samples will be collected directly into the sample container.

Identify sampling methods and equipment:

Sampling methods and regulatory citation: The analytical methods, sample containers, holding times, and sample preservation requirements are presented in Table B.4 and apply to EPA Sampling Methods: 40 CFR 136

Sampling equipment available during the inspection/sampling event:

None required, as samples will be collected directly into the sample containers at the point of the production area discharge into the waterway (creek, stream or river).

Implementation requirements: Will be based on the Lead Inspector's field observations, field conditions, facility operations and/or timing.

Sample preservation requirements: See Table B.4 – Analytical Methods, Preservatives and Containers for Samples

Decontamination procedures: Decon not required, as we will use disposable PPE and dedicated (One-Time-Use) sampling containers.

Any support facilities needed: At this time, no support appears to be needed.

Specific performance requirements for the sampling methods:

Detection limits are defined in contract laboratory's QA manual.

Reporting limits are defined in contract laboratory's QA manual.

These limits will be verified to assure that they will not exceed the regulatory limit of no discharge for CAFOs.

If a failure in the sampling or measurement system occurs, the Lead Inspector/Project Manager must be notified. The Quality Assurance Officer and/or Laboratory Point of Contact will act as advisors to the Lead Inspector/Project Manager. The Lead Inspector/Project Manager will be responsible for any decision concerning corrective action. Corrective action in the field or in the laboratory will be documented in the field notes and/or in the final laboratory analytical report based on the action(s) required.

B.3 Sampling Handling & Custody

The date and time of sample collection will be recorded on the field activity log and on all samples: additionally, that information will be recorded on the Chain of Custody (COC) form. The desired analytical tests to be performed and any preservatives used will also be noted on the COC form. An example COC format is attached in Figure B.3.

Prior to shipment, all samples shall be in custody with the inspection/sampling team. Sample team shall keep all samples in an environment that maintain its preservation (e.g., inside cooler(s) with double bagged ice and packing material) In lieu of tied on tags, stick on sample labels may be used as long as they contain the following information: sampler name, date, time, station location, sampler signature, sample # and analysis requested. Custody seals shall be used on each sample container and sample coolers, unless samples are hand delivered to the designated laboratory by a member of the inspection/sampling team as long as the custody chain is not breached.

B.4 Analytical Methods

Identify analytical methods to be followed (with all options) & required equipment:
See Table B.4 – Analytical Methods, Preservatives and Containers for Samples.

Specify any specific method performance criteria:

The laboratory's NELAC Certification defines all sample parameter performance criteria, as well as the laboratory's QA manual.

Provide validation information for non-standard methods:
N/A

Identify procedures to follow when failures occur:

If failure(s) occur during the analysis, the Laboratory Point of Contact will contact the Lead Inspector/Project Manager within 24-hours, and communicate the failure and identify potential corrective remedies. The Lead Inspector/Project Manager will make the determination on the remedy. The failure(s) and corrective remedies will be document via email and cc: the first-line supervisor and the QA Officer.

Identify individuals responsible for corrective action and appropriate documentation:
Juan Ibarra (EPA Project Manager), and Melissa McCullough (Laboratory Project Manager).

**ENVIRONMENTAL PROTECTION AGENCY
OFFICIAL
CHAIN OF CUSTODY RECORD**

[illegible]

Table B.4 – Analytical Methods, Preservatives and Containers for Samples

Sample Matrix	# of Samples	Analyte / Analyte Sweep	Analytical Method No.	Holding Time (Days)	TCLP	Size and Type of Containers	# of Containers per Sample	Preservatives
Water	≤6	E. coli	SM 9223 B	8 hours		100-mL sterile coliform bottle	1	Ice (≤6°C)
Water	1	E. coli (blank)	SM 9223 B	8 hours		100-mL sterile coliform bottle	1	Ice (≤6°C)
Water	≤6	TKN	SM 4500 N-organic B	28		250-ml Polyethylene	1 Combined	H2SO4 w/ Ice (≤6°C)
Water	≤6	Ammonia - N	SM 4500 NH3-H	28		250-mL polyethylene	1 Combined	H2SO4 w/ Ice (<6 °C)
Water	≤6	Nitrate/Nitrite - N	EPA 353.2	28		250-mL polyethylene	1 Combined	H2SO4 w/ Ice (<6 °C)
Water	≤6	Total Nitrogen	calculation	28		250-ml Polyethylene	1 Combined	H2SO4 w/ Ice (≤6°C)
Water	≤6	Total Phosphorus	SM 4500 P-E	28		250-mL polyethylene	1 Combined	H2SO4 w/ Ice (≤6°C)
Soil	≤10	Routine Analysis	QA Plan OSU-SWFAL	28		Lab. Provided Soil Sampling Bag	1 – Soil Combined	Ship Dry
Soil	≤10	Ammonium-N	QA Plan OSU-SWFAL	28		Lab. Provided Soil Sampling Bag	1 – Soil Combined	Ship Dry
Soil	≤10	Organic Matter	QA Plan OSU-SWFAL	28		Lab. Provided Soil Sampling Bag	1 – Soil Combined	Ship Dry
Soil	≤10	Organic Carbon & Total Nitrogen	QA Plan OSU-SWFAL	28		Lab. Provided Soil Sampling Bag	1 – Soil Combined	Ship Dry

Typical Analytical Method No.**Volatile Organics by GC/MS**

SW846 - 8260B
EPA500 - 524.2
EPA600 - 624
CLP - VOA – MC
CLP - VOA – LC
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Std. Methods 6210C
Std. Methods 6210D

Volatile Organics by GC

SW846 - 8021B
EPA500 - 502.2
EPA600 - 601
EPA600 - 602
Std. Methods 6220B
Std. Methods 6220C
Std. Methods 6230B
Std. Methods 6230C
Std. Methods 6230D

Semi-Volatile Organics by GC/MS

SW846 - 8270D
EPA500 - 525.2
EPA600 - 625
CLP - SVOA - MC
CLP - SVOA - LC
CLP - PEST - LC
Std. Methods 6410
PAH (HPLC)
SW846 - 8310

Inorganic Analytes

SW- 846 7000 Series (AA)
SW- 846 6010C (ICP)
SW- 846 6020A (ICP-MS)
EPA 200 Series (AA)
EPA 200.7 (ICP)
EPA 200.8 (ICP-MS)
CLP Inorganic Method (ICP)
CLP Inorganic Method (AA)
Std Methods 3000 Series (AA)
Std. Method 3120 (ICP)

Herbicides

SW846 - 8151A
EPA 500 - 515.4
EPA 500 - 515.2
Std. Methods 6640

Pesticides & PCBs

SW846 - 8081B
SW846 - 8082A
EPA500 - 508
EPA600 - 608
CLP-PEST- MC
Std. Methods 6630

B.5 Quality Control

Identified below are a number of quality control samples that will be collected.

Trip Blanks: N/A

Field Blanks

Number of Blank(s): Each day, one or more samples will be taken by the sampling team for E. coli analysis. Type II reagent grade deionized water from the Addison COOP wet lab and placed into a certified clean cubitainer, and taken into the field in this container.

Equipment Rinsate Blanks

None required as no equipment is planned to be used.

Rinsate Type: N/A

Describe Preparation: N/A

Blind Replicate or Duplicate Samples

Duplicate samples will be selected by the laboratory for their QC analysis as required by their QA program and protocols, and selected at their choosing.

Sample Matrix: Water

Location: N/A

Matrix Spike (MS) / Matrix Spike Duplicate (MSD) Samples

MS/MSD samples will be selected by the laboratory for their QC analysis as required by their QA program and protocols, and selected at their choosing.

Sample Matrix: Water

Location: To be determined by the laboratory QA Manager.

B.6 Instrument/Equipment Testing, Inspection, and Maintenance

EPA field personnel will not utilize any field instruments during these inspections.

B.7 Instrument/Equipment Calibration and Frequency

Identify all tools, gauges, instruments, and other sampling, measuring, and test equipment used for data generation or collection activities affecting quality that must be controlled and calibrated:

None

Describe or reference how calibration will be conducted using certified equipment and/or standards with known valid relationships to nationally recognized performance standards. If no such nationally recognized standards exist, document the basis for the calibration:

N/A

B.8 Inspection/Acceptance of Supplies & Consumables

The EPA Project Manager will be responsible for inspecting sample containers prior to leaving for the inspection. Only new sample containers accompanied by the manufacturer's certification of pre-cleaning will be used. The sample containers will be inspected for cracks, ill-fitting lids, or other defects prior to use and will be discarded if defects are found.

B.9 Data Acquisition Requirements for Non-Direct Measurements

Records may be collected during the inspection/sampling event to document activities at the facility. Documents may be requested for a period of up to five years prior to the inspection/sampling event. These records will be used for determining the facility's compliance with the requirements of CWA.

B.10 Data Management

Data for this project will be produced both onsite and at the designated/approved Laboratory. Laboratory data will be submitted to the EPA Project Manager and will be included in the subsequent inspection report. Data collected during the inspection may be designated as Confidential Business Information (CBI) by representatives of CRS. For any information for which a CBI claim is made that information will be handled in accordance with the provisions specified for CWA CBI. All records and documents generated during this project will be handled in accordance with EPA's "Standard Operating Procedures for Record and Information Management"

SECTION C – ASSESSMENT AND OVERSIGHT

C.1 Assessments and Response Actions

Documentation and analytical results collected during this project will be evaluated to determine the compliance status as it applies to the facility's requirements under CWA. Results of this evaluation will determine what action, if any, the Agency should take in response to any Areas of Concern identified during the inspection. The magnitude and breadth of any concerns identified will determine the appropriate response on the part of the Agency which includes but is not limited to the issuance of administrative orders, administrative penalty orders, or judicial referral.

C.2 Reports to Management

This project will result in the generation of an inspection report which will include an inspection narrative, a photographic log, documents collected during the inspection, and analytical reports for all samples collected, if any.

SECTION D – DATA VALIDATION AND USABILITY

D.1 Data Review, Verification, and Validation

Data will be accepted if they meet the following criteria:

1. Field logs are complete.
2. Prior to releasing the analytical data, the laboratory staff will review both the sample and QC data to verify sample identity, instrument calibration, quantitation limits, dilution factors, numerical computations, accuracy of transcriptions, and chemical interpretations. In addition, the QC data are tabulated and the results reviewed to ascertain whether they were within the project-required limits for accuracy and precision. Any non-conforming data will be discussed in the data package case narrative. If necessary, qualifiers are applied based on this information. The laboratory staff review will consist of a Peer review, a Senior Chemist review, a Point of Contact review, and a QA Officer review. The review will follow the US EPA National Functional Guidelines for Organic Methods Data Review (SOM02.2), US EPA National Functional Guidelines for Inorganic Data Review (ISM02.2).
3. Field data is reviewed to ensure that they are complete; that sample collection information is thoroughly documented; and that any deviations from the QAPP are noted.
4. Actual sampling locations are documented in the inspection logbook. Locations were determined using GPS instrumentation, linear measurements, and/or photographic references, and will be verified against DigitalGlobe aerial photos and USGS Topographic maps.

5. Sample handling procedures are documented on chain of custody forms.

Any deviations from the QAPP are to be reported in the field logs. The Lead Inspector/Project Manager will verify the contents of these logs. If the data fails to meet the criteria they will be flagged as estimated. Any flagged data will be discussed with management to determine if the data point will be rejected and re-sampling done.

D.2 Verification and Validation Methods

Field data will be validated by the Lead Inspector/Project Manager, and any problems identified during this project will be documented in the field logs. The laboratory supervisor will validate laboratory data according to methods established in their QA Plan.

The Lead Inspector/Project Manager will review and verify field logs and analytical data reports. Any problems or deviations identified will be discussed with the project team and the first-line supervisor to determine corrective action measures.

D.3 Reconciliation with User Requirements

The designated laboratory will provide a final laboratory report along with the supporting electronic data in a usable spreadsheet format. All laboratory bench sheets and equipment calibrations will be maintained by the designated laboratory and will be available upon request. The data will be used to support any future enforcement actions or litigation.

Appendix A: Facility Maps

Ogle Cattle Co and Bowie Texas Livestock Sale Barn

Inspection Date 02/18/2020

Fig 1. USGS Aerial Map showing Ogle Cattle Co and Bowie Texas Livestock Sale Barn.



Ogle Cattle Co and Bowie Texas Livestock Sale Barn

Inspection Date 02/18/2020

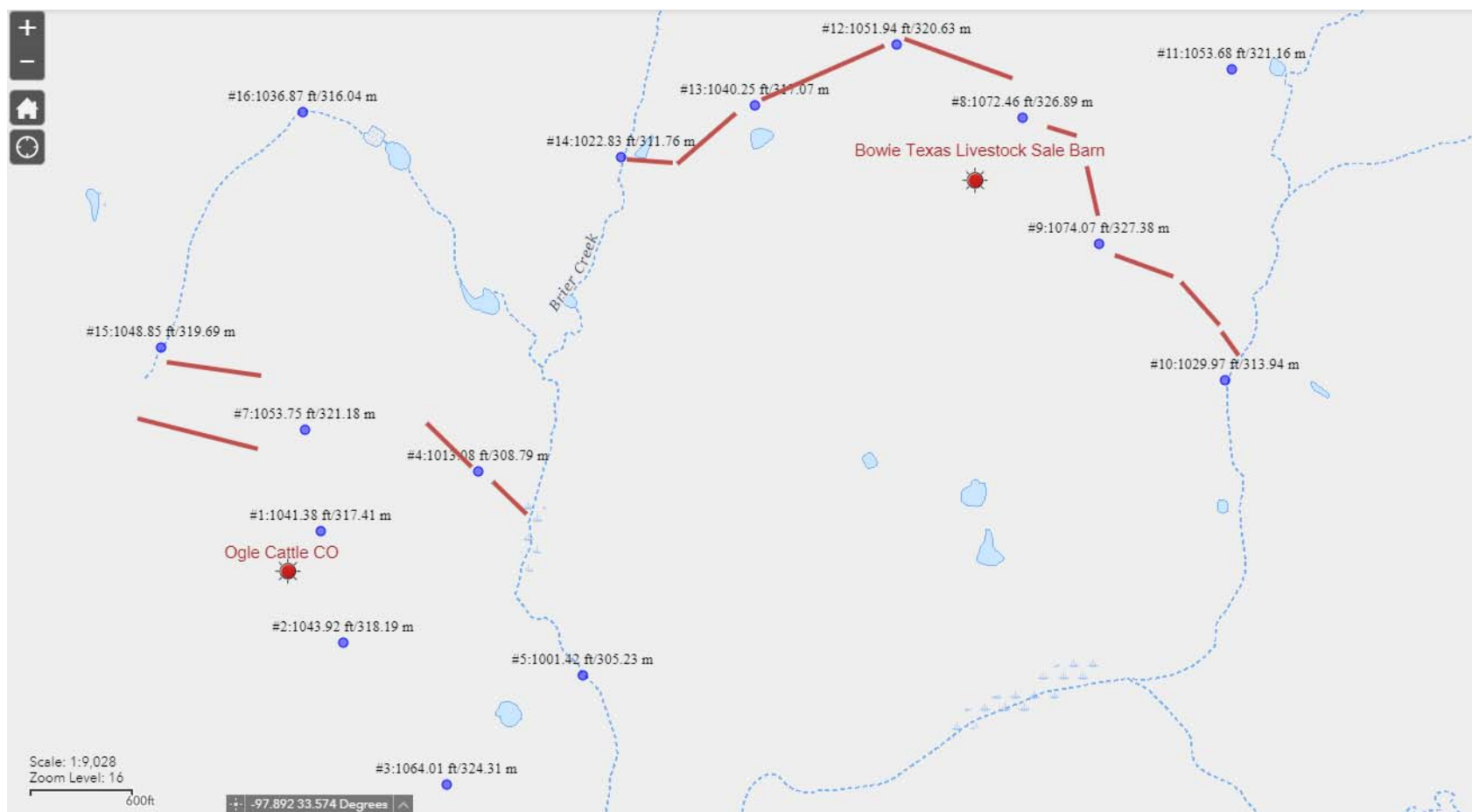
Fig 2. USGS Aerial Map showing Ogle Cattle Co and Bowie Texas Livestock Sale Barn. The red colored pin indicates the location of facilities, blue line indicates intermittent stream and a relative permanence, red lines indicates potential pathways of discharge, and blue dots indicates elevation.



Ogle Cattle Co and Bowie Texas Livestock Sale Barn

Inspection Date 02/18/2020

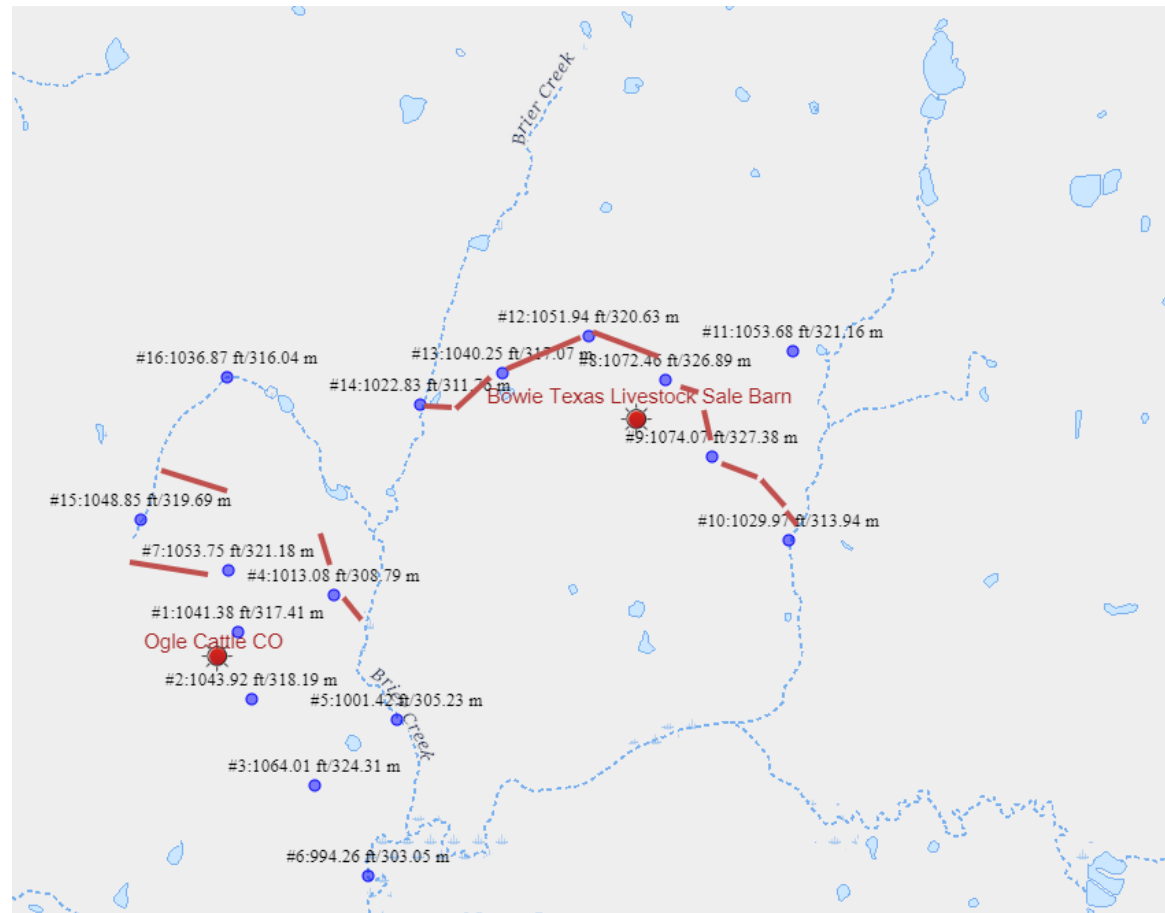
Fig 3. USGS Topographic Map showing Ogle Cattle Co and Bowie Texas Livestock Sale Barn. The red colored pin indicates the location of facilities, blue line indicates intermittent stream and a relative permanence, red lines indicates potential pathways of discharge, and blue dots indicates elevation.



Ogle Cattle Co and Bowie Texas Livestock Sale Barn

Inspection Date 02/18/2020

Fig 4. USGS Topographic Map showing Ogle Cattle Co and Bowie Texas Livestock Sale Barn. The red colored pin indicates the location of facilities, blue line indicates intermittent stream and a relative permanence, red lines indicates potential pathways of discharge, and blue dots indicates elevation.



Ogle Cattle Co and Bowie Texas Livestock Sale Barn

Inspection Date 02/18/2020

Fig 5. USGS Hydro-NHD Map showing Ogle Cattle Co and Bowie Texas Livestock Sale Barn. The red colored pin indicates the location of facilities, blue line indicates intermittent stream and a relative permanence, and blue dots indicates elevation.

