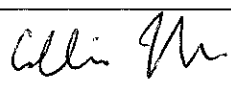
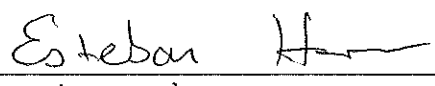




**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	10/23/18		
Media:	Water		
Regulatory Program(s)	NPDES		
Company Name:	Dublin Livestock Auction, LLC		
Facility Name:	Dublin Livestock Auction		
Facility Physical Location:	9862 Hwy 6, (32.085423, -98.255287)		
(city, state, zip code)	Dublin, TX 76446		
Mailing address:	PO Box 158		
(city, state, zip code)	Dublin, TX 76446		
County/Parish:	Erath County		
Facility Contact:	Noel Courts	Consultant	
	Consultant email: manureisgood@yahoo.com		
FRS Number:	N/A		
Identification/Permit Number:	WQ0004136000		
Media Number:	N/A		
NAICS:	11299		
SIC:	5154		
Personnel participating in inspection:			
Collin Martin	6EN-WC	Inspector	214-665-8380
EPA Lead Inspector Signature/Date	 {Inspector name}		12/13/18 Date
Supervisor Signature/Date	 {Supervisor name}		12/13/18 Date

Section I – INTRODUCTION**PURPOSE OF THE INSPECTION**

EPA Region 6 inspector Collin Martin arrived at Dublin Livestock Auction at 9:40 A.M. on 10/23/2018 for an unannounced inspection. I met with the secretary for the facility, Melonie Curry at the opening conference. I presented my credentials to Ms. Curry as I informed her 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. The scope of the inspection was a Compliance Evaluation Inspection and included an evaluation of the compliance of the facility with their TCEQ CAFO permit. Following the opening conference, I proceeded unaccompanied for the duration of the inspection. I corresponded with the facility's consultant after the inspection to gather the remaining information needed to determine the facility's compliance with its TCEQ Individual CAFO Permit (WQ0004136000).

FACILITY DESCRIPTION

Dublin Livestock Auction is a permitted facility that temporarily houses approximately 1,000 cattle per week and is permitted for a maximum of 5,000 total head. According to Ms. Curry, the facility has a weekly sale on Fridays. On a typical week the animals are housed in both covered and uncovered pens from Thursday to Friday, while some animals may stay until Saturday. Mr. Courts informed us that the pens are scraped biweekly and the manure solids are consolidated into a pile on the southeast edge off the pens. The facility's manure solids are transferred offsite to land in Mineral Wells, TX every two to five years or as needed. The facility has five Land Management Units (LMUs) to which it can land apply wastewater. Dublin Livestock Auction is located within the drainage area of the North Bosque River in Segment No. 1226 of the Brazos River Basin.

Section II - OBSERVATIONS**Wastewater & Solids Conveyance**

On the day of the inspection, I observed that the open lots and lot scraping stockpile area all drained toward the facility's Retention Control Structure (RCS). The berm which conveys this wastewater appeared to be in good shape and functioning as intended. I observed three piles just northeast of the stockpile which appeared to be lot scrapings not contained within the watershed of the RCS (Photo #8).

Retention Control Structure

On the day of the inspection I observed that RCS #1 had less than two feet of freeboard and pole marker which was intact and readable (Photo #10).

Land Management Units

On the day of our inspection, I was not able to access any of the facility's LMUs. I spoke with Mr. Courts to confirm that the facility was adhering to the conditions set by his Nutrient Management Plan (NMP).

Records Review

I received and reviewed the required records from the facility's consultant Noel Courts on 11/28/18. I was not able to access these records at the time of the inspection since the facility owner was not available when I was onsite.

Section III – AREAS OF CONCERN

The following Areas of Concern were conveyed to Mr. Courts after leaving the facility:

- Piles of lot scrapings were being stored outside the watershed of an RCS. Per WQ0004136000 VII.A.5(d)(2), manure or sludge areas must be located within the drainage area of the RCS.

Section IV – LIST OF APPENDICES

Appendix 1 – Photo Log – 10 photos taken 10/23/18 and 1 Aerial Images of Significant Photos

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Dublin Livestock Auction		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: DSCN3736.JPG

Date of Photo: 10/23/18

Time of Photo: 2:21 PM

Photographer: Collin Martin

Description: This photo was taken facing southeast toward the uncovered pen area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Dublin Livestock Auction		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: DSCN3737.JPG

Date of Photo: 10/23/18

Time of Photo: 2:24 PM

Photographer: Collin Martin

Description: This photo was taken facing east across RCS #1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Dublin Livestock Auction		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: DSCN3739.JPG

Date of Photo: 10/23/18

Time of Photo: 2:30 PM

Photographer: Collin Martin

Description: This photo was taken facing north towards the inlet in RCS #1 which receives wastewater from the compost area and lots.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Dublin Livestock Auction		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: DSCN3740.JPG

Date of Photo: 10/23/18

Time of Photo: 2:31 PM

Photographer: Collin Martin

Description: This photo was taken facing southwest towards the bermed drainage ditch which conveys wastewater from the end of the pens and compost area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Dublin Livestock Auction		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: DSCN3742.JPG

Date of Photo: 10/23/18

Time of Photo: 2:33 PM

Photographer: Collin Martin

Description: This photo was taken facing the wastewater sitting in the drainage ditch which conveys wastewater from the end of the pens and compost area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Dublin Livestock Auction		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: DSCN3743.JPG

Date of Photo: 10/23/18

Time of Photo: 2:34 PM

Photographer: Collin Martin

Description: This photo was taken facing southwest toward the facility's compost and solids storage area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Dublin Livestock Auction		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: DSCN3745.JPG

Date of Photo: 10/23/18

Time of Photo: 2:38 PM

Photographer: Collin Martin

Description: This photo was taken facing north towards the facility's compost area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Dublin Livestock Auction		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: DSCN3747.JPG

Date of Photo: 10/23/18

Time of Photo: 2:34 PM

Photographer: Collin Martin

Description: This photo was taken facing northwest toward what appears to be piles of lot scrapings being stored outside the watershed of the RCS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Dublin Livestock Auction		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: DSCN3748.JPG

Date of Photo: 10/23/18

Time of Photo: 2:42 PM

Photographer: Collin Martin

Description: This photo was taken facing northeast toward the berm which contains and directs effluent from the compost storage area to RCS #1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Dublin Livestock Auction		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: DSCN3754.JPG

Date of Photo: 10/23/18

Time of Photo: 3:02 PM

Photographer: Collin Martin

Description: This photo was taken facing southeast toward the pole marker in RCS #1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Dublin Livestock Auction		
City: Dublin	County/Parish: Erath	State: Texas

