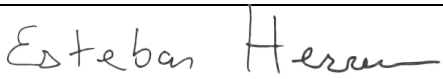




**Region 6 Compliance Assurance and Enforcement Division**  
**INSPECTION REPORT**

|                                        |                                                                                      |             |              |
|----------------------------------------|--------------------------------------------------------------------------------------|-------------|--------------|
| Inspection Date(s):                    | 4/17/19                                                                              |             |              |
| Media:                                 | Water                                                                                |             |              |
| Regulatory Program(s)                  | NPDES                                                                                |             |              |
| Company Name:                          | N/A                                                                                  |             |              |
| Facility Name:                         | Dutch Harvest Dairy                                                                  |             |              |
| Facility Physical Location:            | 12501 Hwy 36                                                                         |             |              |
| (city, state, zip code)                | Comanche, TX 76442                                                                   |             |              |
| Mailing address:                       | 12501 Hwy 36                                                                         |             |              |
| (city, state, zip code)                | Comanche, TX 76442                                                                   |             |              |
| County/Parish:                         | Comanche County                                                                      |             |              |
| Facility Contact:                      | Craig Hicks                                                                          | Owner       |              |
|                                        | Consultant email: manureisgood@yahoo.com                                             |             |              |
| FRS Number:                            | N/A                                                                                  |             |              |
| Identification/Permit Number:          | TXG921539                                                                            |             |              |
| Media Number:                          | N/A                                                                                  |             |              |
| NAICS:                                 | 112120                                                                               |             |              |
| SIC:                                   | 0241                                                                                 |             |              |
| Personnel participating in inspection: |                                                                                      |             |              |
| Collin Martin                          | 6EN-WC                                                                               | Inspector   | 214-665-8380 |
| Chris Lister                           | N/A                                                                                  | Inspector   | 214-665-6672 |
| Craig Hicks                            | N/A                                                                                  | Dairy Owner | 325-330-2697 |
| EPA Lead Inspector<br>Signature/Date   |                                                                                      |             |              |
|                                        | {Inspector name}                                                                     |             | Date         |
| Supervisor<br>Signature/Date           |  |             | 5/22/2019    |
|                                        | {Supervisor name}                                                                    |             | Date         |

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

EPA Region 6 inspectors Collin Martin and Christopher Lister arrived at Dutch Harvest Dairy at 11 A.M. on 04/17/19 for an unannounced inspection. We met with the owner of the facility, Craig Hicks at the opening conference. I presented my credentials to Mr. Hicks as I 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. 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, Mr. Hicks accompanied us for the entirety of the inspection.

**FACILITY DESCRIPTION**

Dutch Harvest Dairy is a permitted facility that confines approximately 1238 cattle. At the time of the inspection, according to Mr. Hicks, the facility was milking 1230 cows. The cows are milked twice per day and between sessions kept in freestall barns or open lots which are situated adjacent to the facility's two Retention Control Structures (RCSs) and one sand settling basin. The freestall lanes are flushed with recycled wastewater which flows into collection pits at the low end of the barns and is subsequently routed to the sand settling basin. Upon exiting the sand settling basin, wastewater is routed towards RCS #1 which functions in series with RCS #2. Wastewater is pumped out of RCS #2 for land application via reel gun or center pivot. Manure solids are scraped and stored next to the sand settling basin. Silage is stored in large plastic socks. Mortalities are composted in the lot scraping piles on the edge of the sand settling area.

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

On the day of the inspection, I observed a large manure pile adjacent to the waste bailing storage area. This manure was being stored outside the watershed of an RCS. (Photo #5). Mr. Hicks informed us that this manure was scraped out of the RCS and had been stored there for more than thirty days.

**Retention Control Structures**

On the day of the inspection I observed trees located within the berm of RCS #2. In addition to these trees, there was a fence line within the boundaries of RCS #2. The tree-line and fence-line ran east-west approximately fifteen feet north of the designed southern berm of RCS #2 (Photo #4).

**Land Management Units**

On the day of the inspection, I observed the Land Management Units to be in good condition and free from any evidence of overapplication such as ponding or puddling. I spoke with Mr. Hicks to confirm that he was adhering to the conditions set by his Nutrient Management Plan (NMP).

**Silage and Commodities Storage**

On the day of our inspection I observed the commodity storage barns to be in good condition. I observed hay in bails and silage which was stored securely in large plastic bags on the eastern edge of the production area.

**Records Review**

At the time of the inspection, the facility's required records were not available on site. After contacting the facility's consultant, I received digital copies of the records on 5/13/2019. I reviewed these records and found them to be accurate and up to date.

**Section III – AREAS OF CONCERN**

The following Areas of Concern were conveyed to Mr. Hicks during the closing conference:

1. Piles of manure were being stored uncovered adjacent to the waste bailage area. Per TXG921539 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.
2. Trees and woody vegetation had taken root within the interior of RCS #2. This vegetation will need to be removed to prevent the root zone from intruding upon the RCS liner per TXG921539 Part III.A.10(f)(3).

**Section IV – LIST OF APPENDICES**

Appendix 1 – Photo Log – Seven (7) photos taken 04/17/19 and one (1) aerial image of significant photo locations

## Appendix 1

### Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 1

|                               |                         |           |
|-------------------------------|-------------------------|-----------|
| Location: Dutch Harvest Dairy |                         |           |
| City: Comanche                | County/Parish: Comanche | State: TX |



Photo File Name: P4170088.JPG

Date of Photo: 4/17/19

Photographer: Chris Lister

Description: This photo was taken facing east across the facility's sand separating basin.



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 2

|                               |                         |           |
|-------------------------------|-------------------------|-----------|
| Location: Dutch Harvest Dairy |                         |           |
| City: Comanche                | County/Parish: Comanche | State: TX |



Photo File Name: P4170089.JPG

Date of Photo: 4/17/19

Photographer: Chris Lister

Description: This photo was taken facing northeast across the facility's sand separating basin.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 3

|                               |                         |           |
|-------------------------------|-------------------------|-----------|
| Location: Dutch Harvest Dairy |                         |           |
| City: Comanche                | County/Parish: Comanche | State: TX |



Photo File Name: P4170092.JPG

Date of Photo: 4/17/19

Photographer: Chris Lister

Description: This photo was taken facing northwest toward the facility's reel gun.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 4

|                               |                         |           |
|-------------------------------|-------------------------|-----------|
| Location: Dutch Harvest Dairy |                         |           |
| City: Comanche                | County/Parish: Comanche | State: TX |



Photo File Name: P4170094.JPG

Date of Photo: 4/17/19

Photographer: Chris Lister

Description: This photo was taken facing southwest from the northeast corner of RCS #2. Note the trees are rooted within the interior of the RCS.



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 5

|                               |                         |           |
|-------------------------------|-------------------------|-----------|
| Location: Dutch Harvest Dairy |                         |           |
| City: Comanche                | County/Parish: Comanche | State: TX |



Photo File Name: P4170106.JPG

Date of Photo: 4/17/19

Photographer: Chris Lister

Description: This photo was taken facing the facility's compost pile. The facility's mortalities are composted in this pile.



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 6

|                               |                         |           |
|-------------------------------|-------------------------|-----------|
| Location: Dutch Harvest Dairy |                         |           |
| City: Comanche                | County/Parish: Comanche | State: TX |



Photo File Name: P4170112.JPG

Date of Photo: 4/17/19

Photographer: Chris Lister

Description: This photo was taken facing southwest toward the manure pile which was located outside of the watershed of an RCS. Note the vegetation which has grown on the surface of the pile which indicates it has been stored for longer than thirty days.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## Photograph Log

Photo No. 7

|                               |                         |           |
|-------------------------------|-------------------------|-----------|
| Location: Dutch Harvest Dairy |                         |           |
| City: Comanche                | County/Parish: Comanche | State: TX |



Photo File Name: P4170113.JPG

Date of Photo: 4/17/19

Photographer: Chris Lister

Description: This photo was taken facing northwest across one of the facility's Land Management Units.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
**Photograph Log**

Photo No. 8

|                               |                         |           |
|-------------------------------|-------------------------|-----------|
| Location: Dutch Harvest Dairy |                         |           |
| City: Comanche                | County/Parish: Comanche | State: TX |

### Approximate Locations of Significant Photos

Dutch Harvest Dairy

