

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	01-13-2025	
Media Program:	Water	
Regulatory Program(s)	NPDES CAFO	
Company Name:	Blue Sky Farms	
Facility Name:	Southland Dairy (TX0130907)	
Facility Physical Location:	4611 S FM 219	
(city, state, zip code)	Dublin, TX 76446 (32.0477, -98.3034)	
Mailing address:	4611 S FM 219	
(city, state, zip code)	Dublin, TX 76446	
County/Parish:	Erath	
Facility Phone Number	(806) 265-3310	
Facility Contact:	Cody Dewit	Dairy Manager
	CodyD@BlueSkyFarms.com	
FRS Number:		
Identification/Permit Number:	TX0130907	
Media Identifier Number:		
NAICS:	112120	
SIC:	0241	
Personnel participating in inspection:		
Cody Dewit	Blue Sky Farms	Manager
Corey Mullin	Enviro-Ag	Consultant
Lucas Bomar	EPA R6	Inspector (Lead)
Destinee Agwuna	EPA R6	Inspector
EPA Lead Inspector Signature/Date		Date
	Lucas Bomar	
Supervisor Signature/Date		Date
	Anthony Loston	

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Lucas Bomar and Destinee Agwuna arrived at Southland Dairy at 9:46 a.m. on 01-13-2025 for an announced inspection. The facility is in a Dairy Outreach Program Area (DOPA). Inspectors met with the dairy manager, Mr. Cody Dewit, at the Opening Conference. Inspectors presented their credentials to Mr. Dewit and informed him that this was an EPA inspection to determine compliance with the facility's TCEQ CAFO Permit (TX0130907) and the Concentrated Animal Feeding Operations (CAFO) requirements as found in the Clean Water Act (CWA). The scope of the inspection was a full compliance evaluation and includes an evaluation of the facility's compliance with its NMP.

The sequence for the inspection was an introductory overview conducted during the opening conference, followed by a site review, and review of the NMP paperwork. The inspectors wore boot covers, parked the washed government vehicle at the office parking lot, and toured the site in a company car for biosecurity. The consultant for the facility, Mr. Corey Mullin, joined the inspection.

FACILITY DESCRIPTION

The TCEQ CAFO permit (TX0130907) was issued to Southland Dairy on 10-13-2022, and it expires in five years on 10-13-2027. The farm was evaluated for its operation and compliance with their permit requirements, as well as for the terms found in their nutrient management plan (NMP). At the time of the inspection, the dairy had 3200 milking cows, 550 dry cows and 50 calves. The cows are milked twice daily and are kept in covered freestalls between milking sessions. Half of the dry cows are kept in covered freestalls, and half is kept in open lot pens.

There are two wastewater lagoons located in the production area: RCS (Retention Control Structure) 1 and RCS 2. RCS 1 is split up into three sections and RCS 2 has 2 sections, each in sequence. There is a RCS located down gradient from their manure storage and drying area. Five manure settling basins are present: 3,4,5,6, and 7 on the production area. Wastewater is applied to LMUs (Land Management Unit) 3,4,5,6 & 10 for 2023 and 2024 using center pivots. Slurry is applied to LMUs Bagley E, Bagley M, Bagley N, Big John, Faegan West, LMU 1, 4 5, 6, 7, 10, 11, 12, 13, 14, 15, 9, 8, Munoz, and Rodriguez 1 for 2023 and 2024.

All commodities were stored under cover or in silos.

All records were kept on site using CAFO PRO software and were digitally available when requested.

Section II – OBSERVATIONS

Lagoon Management:

All the RCSs for the facility are designed to receive the production area wastewater runoff. RCS 1 capacity was 51.95 acre/ft and RCS 2 capacity was 43.09 acre/ft. All the RCSs have a permeability rating greater than 1×10^{-7} and was certified by Norman Mullin from Enviro-Ag Engineering on 10/03/10. Fences were present. All pole markers showed adequate freeboard and are below the 25-yr/24-hr rain event mark. However, some small trees are growing on the perimeter of RCS 1 and RCS 2, and all the lagoon embankments need to be mowed to remove tall weeds to prevent liner intrusion (see Areas of Concern). The facility is using berms and drainage channels to route all runoff to RCS. All of these were adequate at the time of the inspection.

Nutrient Management Plan Review:

The facility has an up-to-date Nutrient Management Plan (NMP). A review of the nutrient application data showed that the facility was keeping appropriate records for the amounts of nitrogen and phosphorus applied to the land application sites at the Southland Dairy for both the lagoon process wastewater and slurry. The facility is also tracking the required annual soil, wastewater, and manure solids nutrient concentrations. Fields were evaluated for agronomic rate application and both land application sites are land applying below the agronomic rate.

Mortality Management Area:

Mortalities are composted on site. No signs of carcasses at mortality management area. Composting is occurring within the drainage of an RCS.

Composting:

Manure composting occurs on site in dry yard. Composting was within the drainage of an RCS with the ability to pump to RCS 1 as needed.

Dewatering Equipment:

A check of LMU 10 and LMU 5 center pivots showed no leaks or ponding present. Check valves were also present to prevent backflow.

Section III – AREAS OF CONCERN

The Southland Dairy is very well operated and maintained, with good implementation of the best management practices contained within the NMP. There is, however, one area of concern.

1) Small trees are growing around the perimeter of RCS 1 and RCS 2, and all the lagoon embankments need to be mowed to remove tall weeds to prevent liner intrusion. The TCEQ CAFO General Permit Part IIIA.10(f)(3) requires that “No tree shall be allowed to grow such that the root zone would intrude or compromise the structure of the liner or embankment.”

No other areas of concern were found at the time of the inspection. Inspectors exited the facility at 12:53 PM.

Section IV – FOLLOW UP

An offsite records review was conducted post inspection. All requested records requested were received by EPA R6 on 01/16/2025.

Section V – LIST OF APPENDICES

Appendix 1: consists of thirty-four photos taken 01/13/25.

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010455.JPG

Date of Photo: 01-13-25

Time of Photo: 10:35 AM

Photographer: Lucas Bomar

Description: Commodities storage bunkers under cover.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010456.JPG

Date of Photo: 01-13-25

Time of Photo: 10:35 AM

Photographer: Lucas Bomar

Description: Hay bale piles under roof.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010457.JPG

Date of Photo: 01-13-25

Time of Photo: 10:38 AM

Photographer: Lucas Bomar

Description: Shot of covered free stalls with slope to drainage channel.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010458.JPG

Date of Photo: 01-13-25

Time of Photo: 10:30 AM

Photographer: Lucas Bomar

Description: Drainage channel next to covered free stalls. Routes to RCS 1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010459.JPG

Date of Photo: 01-13-25

Time of Photo: 10:40 AM

Photographer: Lucas Bomar

Description: Shot of culvert in drainage channel. Diverts water to RCS 1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010460.JPG

Date of Photo: 01-13-25

Time of Photo: 10:44 AM

Photographer: Lucas Bomar

Description: Berm on perimeter between road and silage bunkers.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010461.JPG

Date of Photo: 01-13-25

Time of Photo: 10:44 AM

Photographer: Lucas Bomar

Description: Perimeter berm extending south.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010462.JPG

Date of Photo: 01-13-25

Time of Photo: 10:44 AM

Photographer: Lucas Bomar

Description: Covered silage storage bunkers.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010463.JPG

Date of Photo: 01-13-25

Time of Photo: 10:44 AM

Photographer: Lucas Bomar

Description: Covered silage storage with only working end open.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010464.JPG

Date of Photo: 01-13-25

Time of Photo: 10:49 AM

Photographer: Lucas Bomar

Description: Berm around perimeter of silage storage bunkers diverting runoff to silage storage basin.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010465.JPG

Date of Photo: 01-13-25

Time of Photo: 10:50 AM

Photographer: Lucas Bomar

Description: Silage storage basin with silage bunkers in background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010466.JPG

Date of Photo: 01-13-25

Time of Photo: 10:53 AM

Photographer: Lucas Bomar

Description: Drainage channel next to calf hutches. Routes to RCS 1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010467.JPG

Date of Photo: 01-13-25

Time of Photo: 10:55 AM

Photographer: Lucas Bomar

Description: Drainage channel extending with RCS 1 in background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010468.JPG

Date of Photo: 01-13-25

Time of Photo: 10:58 AM

Photographer: Lucas Bomar

Description: Concrete settling structures between drainage channel and maternity stalls.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 15

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010469.JPG

Date of Photo: 01-13-25

Time of Photo: 11:02 AM

Photographer: Lucas Bomar

Description: RCS 1.1 Some woody vegetation in embankment in foreground.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 16

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010470.JPG

Date of Photo: 01-13-25

Time of Photo: 11:03 AM

Photographer: Lucas Bomar

Description: RCS 1.2. Some small trees in embankment in foreground.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 17

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010471.JPG

Date of Photo: 01-13-25

Time of Photo: 11:06 AM

Photographer: Lucas Bomar

Description: RCS 1.2. Small tree in embankment. Free stalls in background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010472.JPG

Date of Photo: 01-13-25

Time of Photo: 11:15 AM

Photographer: Lucas Bomar

Description: Slurry pit with truck wash and free stalls in background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 19

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010473.JPG

Date of Photo: 01-13-25

Time of Photo: 11:18 AM

Photographer: Lucas Bomar

Description: Second slurry pit in series. Routes to RCS 1.2.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 20

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010474.JPG

Date of Photo: 01-13-25

Time of Photo: 11:18 AM

Photographer: Lucas Bomar

Description: Slurry pit channel to RCS 1.2.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 21

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010475.JPG

Date of Photo: 01-13-25

Time of Photo: 11:27 AM

Photographer: Lucas Bomar

Description: Berm between lagoon 1.2 and 1.3 with pumps. Woody vegetation in embankments.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 22

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010476.JPG

Date of Photo: 01-13-25

Time of Photo: 11:27 AM

Photographer: Lucas Bomar

Description: RCS 1.3. Woody vegetation in embankment in foreground. Pole marker visible in background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010477.JPG

Date of Photo: 01-13-25

Time of Photo: 11:34 AM

Photographer: Lucas Bomar

Description: Berm between RCS 1.3 and manure dry yard.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 24

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010478.JPG

Date of Photo: 01-13-25

Time of Photo: 11:34 AM

Photographer: Lucas Bomar

Description: RCS 1.3. RCS 1.2 and 1.1 in background with free stalls.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 25

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010479.JPG

Date of Photo: 01-13-25

Time of Photo: 11:40 AM

Photographer: Lucas Bomar

Description: Composting on site with dry yard in background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 26

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010480.JPG

Date of Photo: 01-13-25

Time of Photo: 11:40 AM

Photographer: Lucas Bomar

Description: Manure dry yard with RCS in background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010481.JPG

Date of Photo: 01-13-25

Time of Photo: 11:43 AM

Photographer: Lucas Bomar

Description: Drainage channel from dry yard to RCS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 28

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010482.JPG

Date of Photo: 01-13-25

Time of Photo: 11:44 AM

Photographer: Lucas Bomar

Description: RCS below dry yard with pump shown. Has the ability to pump to RCS 1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 29

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010483.JPG

Date of Photo: 01-13-25

Time of Photo: 11:44 AM

Photographer: Lucas Bomar

Description: Composting and dry yard showing grading to RCS.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 30

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010484.JPG

Date of Photo: 01-13-25

Time of Photo: 11:49 AM

Photographer: Lucas Bomar

Description: Pens graded toward RCS 2.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 31

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010485.JPG

Date of Photo: 01-13-25

Time of Photo: 11:58 AM

Photographer: Lucas Bomar

Description: RCS 2 with pole marker. Woody vegetation present in embankment in foreground.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 32

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010486.JPG

Date of Photo: 01-13-25

Time of Photo: 11:52 AM

Photographer: Lucas Bomar

Description: RCS 2. Woody vegetation in embankment and growing in lagoon.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 33

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010487.JPG

Date of Photo: 01-13-25

Time of Photo: 11:56 AM

Photographer: Lucas Bomar

Description: RCS 2 with woody vegetation in embankment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 34

Location: Southland Dairy		
City: Dublin	County/Parish: Erath	State: Texas



Photo File Name: R0010488.JPG

Date of Photo: 01-13-25

Time of Photo: 11:56 AM

Photographer: Lucas Bomar

Description: RCS 2 with pens in background.