

Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	01-20-2026	
Media Program:	Water	
Regulatory Program(s)	NPDES CAFO	
Company Name:	Sulphur Springs Livestock Auctions	
Facility Name:	Sulphur Springs Livestock Auctions	
Facility Physical Location:	1910 S Broadway St	
(city, state, zip code)	Sulphur Springs, Texas 75482(33.1025, -95.5964)	
Mailing address:	1910 S Broadway St	
(city, state, zip code)	Sulphur Springs, Texas 75482	
County/Parish:	Hopkins	
Facility Phone Number	(903) 885-2455	
Facility Contact:	Noe Courts	Consultant
	manureisgood@yahoo.com	
FRS Number:	110070379842	
Identification/Permit Number:	TX0144801	
Media Identifier Number:		
NAICS:	424520	
SIC:	5154	
Personnel participating in inspection:		
Noel Courts	Lowther Consulting	Consultant
Lucas Bomar	EPA R6	Inspector (Lead)
Kamilah Hutchinson	EPA R6	Inspector
Mason Tidmore	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, Kamilah Hutchinson, and Mason Tidmore arrived at Sulphur Springs Livestock Auctions at 8:36 AM on 01-20-2026 for an announced inspection. The facility is in a Dairy Outreach Program Area (DOPA). Inspectors met with the consultant, Mr. Noel Courts, at the Opening Conference. Inspectors presented their credentials to Mr. Courts and informed him that this was an EPA inspection to determine compliance with the facility's TCEQ CAFO Permit (TX0144801), 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 Nutrient Management Plan (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 and records required in the permit. The inspectors wore boot covers, parked the washed government vehicle at the facility parking lot, and toured the site on foot. The consultant for the facility, Mr. Courts, joined the inspection.

FACILITY DESCRIPTION

The TCEQ CAFO permit (TX0144801) was issued to Sulphur Springs Livestock Auctions on 07-25-2024, and it expires in five years on 07-25-2029. The facility was evaluated for its operation and compliance with their permit requirements, as well as for the terms found in their NMP. The auction has sales every Monday and sells beef cattle. In 2024, the auction averaged 473 head of cattle per sale. The cows are kept in open lot pens. Pens are cleaned via scraping as needed.

There are three RCSs (Retention Control Structures) located in the production area: CCRP (concrete retention pond), RCS 1, and RCS 2 (Appendix 1, Photos 2,5, & 12). CCRP and RCS 1 act in series where CCRP can pump directly to RCS 1. CCRP is on the west side of the pens and RCS 1 is on the east side of the pens. RCS 2 is on the north end of the facility. The facility has an agreement with their neighbor to land apply on a field designated as LMU 1.

Hay commodities are stored above drainage of RCS 2 (Appendix 1, Photo 13).

Section II – OBSERVATIONS

Lagoon Management:

All the RCSs for the facility are designed to receive the production area wastewater runoff. CCRP and RCS 1 have required capacity of 4.00 acre/ft and 8.10 acre/ft respectively for a combined required total of 12.1 acre/ft. The as-built capacity upon review was 12.70 acre/ft. The required capacity for RCS 2 is 4.41 acre/ft, and the as-built capacity is 6.7 acre/ft. RCS 1 and RCS 2 have a permeability rating greater than 1×10^{-7} and were certified on 06-09-2025. CCRP is going to be lined with concrete. Lagoon as-built

information was certified on 06-24-2025 by M. Berry P.E. Pole markers were installed directly after the inspection by the consultant and photo evidence was provided to EPA for follow-up (Appendix 2, Photos 1-7). A visual check of the lagoons showed adequate freeboard and are below the 25-yr/24-hr rain event mark. There were no signs of erosion and cattle did not have access to the lagoons. The facility is using berms, pumps, and land grading to route all runoff to RCS (Appendix 1, Photos 1, 3, 7, 11, 13, & 14). There was a break in the berm on the south perimeter of the facility (Appendix 1, Photo 4) (See Areas of Concern).

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 Sulphur Springs Livestock wastewater. The facility is also tracking the required annual soil, wastewater, and manure solids nutrient concentrations. LMU 1 was evaluated for agronomic rate application in 2025, and the facility was found to be land applying below the agronomic rate in line with their NMP.

Mortality Management Area:

Mortalities are landfilled. No signs of carcasses at mortality management area.

Land Management Units:

The facility has an agreement with their neighbor to the east for land applying wastewater generated at the facility. This field is denoted as LMU 1 in their NMP. LMU 1 is 15 acres. There was no sign of ponding from land application. However, there was a drainage channel from the facility's lateral water line that was draining into the field at the time of the inspection (Appendix 1, Photos 8-10) (See Areas of Concern).

Section III – AREAS OF CONCERN

The Sulphur Springs Livestock Auctions is very well operated and maintained, with good implementation of the best management practices contained within the NMP and permit. There are, however, two areas of concern:

1. There is a break in the lateral water line that will allow for runoff from the pens to exit offsite. "Wastewater must be contained in RCSs properly, designed, constructed, operated, and maintained according to the provisions of this general permit" Part III.A 5.(a)(4) of the Texas Commission of Environmental Quality General Permit to Discharge Wastes.
2. There is a break in the berm on the south perimeter of the facility. "Stormwater runoff must be diverted from contact with feedlots and holding pens, and manure or process wastewater storage systems" Part III.A.6.(c)(2) of the Texas Commission of Environmental Quality General Permit to Discharge Wastes.

No other areas of concern were found at the time of the inspection. Inspectors exited the facility at 10:05 AM.

Section IV – FOLLOW UP

An offsite records review was conducted post inspection due to logistical concerns. Additionally, the consultant for the facility provided photos to show installation of pole markers in RCS 1 and RCS 2 (See Appendix 2).

Section V – LIST OF APPENDICES

Appendix 1: consists of fifteen photos taken 01-20-26.

Appendix 2: Aerial photograph sourced from Google Maps depicting facility and surrounding area.

Appendix 3: consists of seven photos provided by consultant received by EPA on 01-21-2026.

Appendix 1

Photograph Log

Photo No. 1

Facility/Location:		Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	SW	
Filename:	R0010685.JPG	Photo Date:		01/20/2026		Time:	08:52:55	
Photographer:	Luke Bomar			Witness Name:		Mason Tidmore, Kamilah Hutchinson		



Description:	View to the southwest. Berm along the west perimeter pens.		
Latitude:	33.101	Longitude:	-95.596



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Facility/Location:	Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	N
Filename:	R0010686.JPG	Photo Date:	01/20/2026	Time:	08:57:08		
Photographer:	Luke Bomar			Witness Name:	Mason Tidmore, Kamilah Hutchinson		



Description:	View to the north. CCRP#1 with pump to RCS#1.		
Latitude:	33.100	Longitude:	-95.597



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 3

Facility/Location:		Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	N	
Filename:	R0010687.JPG	Photo Date:		01/20/2026		Time:	09:10:38	
Photographer:	Luke Bomar			Witness Name:		Mason Tidmore, Kamilah Hutchinson		



Description:	View to the north. West perimeter of the pens with berm alongside S Broadway St.		
Latitude:	33.099	Longitude:	-95.597



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Photo No: 4

Facility/Location:		Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	S	
Filename:	R0010688.JPG	Photo Date:		01/20/2026		Time:	09:17:12	
Photographer:	Luke Bomar			Witness Name:		Mason Tidmore, Kamilah Hutchinson		



Description:	View to the south. Break in the berm along the southern perimeter of the facility.		
Latitude:	33.098	Longitude:	-95.596



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 5

Facility/Location:	Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	NW
Filename:	R0010689.JPG	Photo Date:	01/20/2026	Time:	09:29:23		
Photographer:	Luke Bomar			Witness Name:	Mason Tidmore, Kamilah Hutchinson		



Description:	View to the northwest. RCS#1 located on the east side of the facility with pens in background.		
Latitude:	33.099	Longitude:	-95.595



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Photograph Log

Photo No. 6

Facility/Location:	Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	N
Filename:	R0010690.JPG	Photo Date:	01/20/2026		Time:	09:29:37	
Photographer:	Luke Bomar			Witness Name:	Mason Tidmore, Kamilah Hutchinson		



Description:	View to the north. Eastern edge of the facility on the berm between RCS#1 and neighboring field used for land application.		
Latitude:	33.099	Longitude:	-95.595



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Facility/Location:	Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	W
Filename:	R0010691.JPG	Photo Date:	01/20/2026		Time:	09:29:43	
Photographer:	Luke Bomar			Witness Name:	Mason Tidmore, Kamilah Hutchinson		



Description:	View to the west. South perimeter of the facility.		
Latitude:	33.098	Longitude:	-95.594



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 8

Facility/Location:	Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	W
Filename:	R0010692.JPG	Photo Date:	01/20/2026	Time:	09:43:55		
Photographer:	Luke Bomar			Witness Name:	Mason Tidmore, Kamilah Hutchinson		



Description:	View to the west. Break in lateral water line exposing line to runoff from the facility. Pipe outfall leads to field on east perimeter of facility directly behind photo.		
Latitude:	33.102	Longitude:	-95.594



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Facility/Location:	Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	W
Filename:	R0010693.JPG	Photo Date:	01/20/2026		Time:	09:05:57	
Photographer:	Luke Bomar			Witness Name:	Mason Tidmore, Kamilah Hutchinson		



Description:	View to the west. Culvert outfall from the lateral water line that leads into field to the east.		
Latitude:	33.102	Longitude:	-95.594



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Facility/Location:	Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	E
Filename:	R0010694.JPG	Photo Date:	01/20/2026		Time:	09:19:50	
Photographer:	Luke Bomar			Witness Name:	Mason Tidmore, Kamilah Hutchinson		



Description:	Drainage path of lateral water line into the neighboring field to the east.		
Latitude:	33.102	Longitude:	-95.594



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Facility/Location:	Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	E
Filename:	R0010695.JPG	Photo Date:	01/20/2026	Time:	09:44:59		
Photographer:	Luke Bomar			Witness Name:	Mason Tidmore, Kamilah Hutchinson		



Description:	View to the east. On top of berm between RCS#2 and Rock Creek.		
Latitude:	33.104	Longitude:	-95.595



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 12

Photo No: 12

Facility/Location:		Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	S	
Filename:	R0010696.JPG	Photo Date:		01/20/2026		Time:	09:49:48	
Photographer:	Luke Bomar			Witness Name:		Mason Tidmore, Kamilah Hutchinson		



Description:	View to the southeast. RCS#2 with pens in background.		
Latitude:	33.103	Longitude:	-95.595



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 13

Facility/Location:	Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	W
Filename:	R0010697.JPG	Photo Date:	01/20/2026		Time:	09:52:08	
Photographer:	Luke Bomar			Witness Name:	Mason Tidmore, Kamilah Hutchinson		



Description:	View to the west. Hay storage in drainage of RCS#2.		
Latitude:	33.103	Longitude:	-95.595



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 14

Photo No: 24

Facility/Location:		Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	S	
Filename:	R0010698.JPG	Photo Date:		01/20/2026		Time:	09:52:16	
Photographer:	Luke Bomar			Witness Name:		Mason Tidmore, Kamilah Hutchinson		



Description:	View to the south. Manure stockpile within drainage of RCS#2.		
Latitude:	33.103	Longitude:	-95.595



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 1

Photograph Log

Photo No. 15

Photo No: 13

Facility/Location:		Sulphur Springs Livestock Auction						
City:	Sulphur Springs	County:	Hopkins County	State:	TX	Direction:	N	
Filename:	R0010699.JPG	Photo Date:		01/20/2026		Time:	09:52:16	
Photographer:	Luke Bomar			Witness Name:		Mason Tidmore, Kamilah Hutchinson		



Description:	View to the north. Drainage path leading from manure stockpile to RCS#2.		
Latitude:	33.103	Longitude:	-95.595

Appendix 2

Aerial Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Photograph Log



Photo 1: Aerial photo, sourced from Google Maps, depicting the facility and surrounding areas.

Appendix 3

Follow-Up Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

