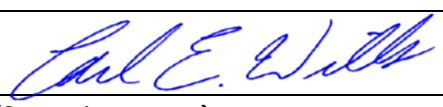


Del Oro Dairy
Inspection Date 06/07/2022



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	06/07/2022	
Media Program:	Water	
Regulatory Program(s)	CAFO	
Company Name:	Del Oro Dairy 32.026436, -106.598970	
Facility Name:	Del Oro Dairy	
Facility Physical Location:	1025 East O'Hara Road	
(city, state, zip code)	Anthony, NM 88021	
Mailing address:	same	
(city, state, zip code)	same	
County/Parish:	Dona Ana	
Facility Phone Number		
Facility Contact:	Linda Armstrong	Owner Partner and CNMP
	lindaarmstrong@zianet.com	
FRS Number:	110010622629	
Identification/Permit Number:	NMG010026	
Media Identifier Number:	N/A	
NAICS:	112120	
SIC:	0241	
Personnel participating in inspection:		
Linda Armstrong	Del Oro Dairy	CNMP
Lucas Bomar	EPA/6ECAD-WA	Inspector
Jack Arias	EPA/6ECAD-WA	Inspector
Juan Ibarra	EPA/6ECAD-WA	Inspector - Lead
EPA Lead Inspector Signature/Date	JUAN IBARRA Digitally signed by JUAN IBARRA DN: c=US, o=U.S. Government, ou=Environmental Protection Agency, cn=JUAN IBARRA, 0.9.2342.19200300.100.1.1=68001003637961 Date: 2022.07.26 13:05:48 -05'00'	
	{Inspector name}	Date
Supervisor Signature/Date	 {Supervisor name}	July 27, 2022 Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Juan Ibarra, Lucas Bomar and Jack Arias arrived at Del Oro Dairy at 0900 on June 7, 2022, for an announced inspection (due to Covid precautions and scheduling coordination). We met with Ms. Linda Armstrong/Facility Certified Nutrient Management Planner (CNMP) at the Opening Conference. I presented my credentials to Ms. Armstrong and informed her that this was an EPA inspection to determine the facility's compliance status with the requirements of the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) Concentrated Animal Feeding Operation (CAFO) regulations stipulated within the facility's EPA CAFO general permit. The scope of the inspection included a compliance evaluation of the facility's site operations, lagoon maintenance, nutrient management plan, and record keeping requirements of their permit. For biosecurity purposes, the inspectors toured the site in Ms. Armstrong's vehicle and wore over-boots.

FACILITY DESCRIPTION

Del Oro Dairy has a current permit and Nutrient Management Plan (NMP) for 3000 total mature cattle (including the number of heifers and bulls totaling 320), of which 2659 are milking head at the time of the inspection. The cows are milked twice daily and are all kept in open pens. The facility has two HDPE milking parlor process wastewater retention control structures (RCSs) which are preceded by solids separation. The solids separator consists of a pair of concrete settling basins and a single manure screen. The solids separator is located on the south side of the clean storm water diversion arroyo that cuts across the middle of the dairy on an east to west axis (see the aerial photograph and Photo 3 in Appendix 1). RCS A has a design capacity of 21.996 acre-feet. RCS A then flows into RCS B which has a design capacity of 44.498 acre-feet. The dairy also has two HDPE storm water RCSs to collect runoff from the open cattle pens. RCS C has a design capacity of 11.06 acre-feet, and RCS D has a design capacity of 6.82 acre-feet. All four RCSs are operated as evaporative lagoons as described within the NMP. The NMP also includes information on the design, construction/"As-Built", original engineer's certification (by Marvin McGee, P.E.), and latest "5-year No Hydrologic Connection" certification dated 3/5/2018 (also by Marvin McGee, P.E.).

The dairy reports that they use 12,000 gpd fresh ground water to operate the dairy and flush the milking parlor. They also use recycled water from the larger process wastewater RCS (RCS B) to flush the cattle holding pen that is located prior to the milking parlor. Ms. Armstrong stated that the dairy was originally designed to operate at a fresh water use rate of 60,000 gpd, but that has been reduced to the 12,000 gpd. She also indicated that due to the reduced fresh-water use, they now have excess capacity in the process wastewater RCSs A and B.

The dairy does not land apply any process wastewater from any of the lagoons, as they function as total evaporative units. As such, there are no land application fields or nutrient management records for this facility. Additionally, all manure solids are given away to third-party farmers, and mortalities are picked up daily by Karl Schneider for rendering. Very good records are kept for the disposal of these wastes.

Section II – OBSERVATIONS

There is a significant accumulation of manure solids in RCS A as shown in Photo 1 of Appendix 1 (see AOC 1). There are also two areas where berm maintenance is required to ensure that storm water runoff from the cattle pens is directed into one of the storm water RCSs during the 25-yr/24-hr rain event.

The south side of the clean storm water diversion arroyo shown in Photo 3 of Appendix 1 requires berm improvement and maintenance to ensure that pen area runoff does not enter the arroyo, and the other area is at the south-west corner of the cattle pens which should direct production area storm water runoff into RCS D (see AOC 2).

The dairy has excellent record keeping and a thoroughly documented NMP, and aside from the two issues described above, the dairy is well managed and operated.

No other issues were found during the inspection.

Section III – AREAS OF CONCERN

AOC 1 - A significant amount of manure solids has accumulated in RCS A. RCS A either needs to be assessed by an engineer to ensure that sufficient wastewater capacity still exists within RCS A and B, and that the solids accumulation has not exceeded the units design limits. Or, the dairy can remove the excess manure solids from the unit and give them to a third party. Part III.A.3.a. of the EPA permit requires “...adequate storage of manure.....including procedures to ensure proper operation and maintenance of the storage facilities. All wastewater and manure containment structures shall at a minimum be designed, constructed, operated, and maintained in accordance with the standards of the Natural Resources Conservation Service, Field Office Technical Guide.” Additionally, Part III.D.2 also requires that “The operator shall restore the storage capacity as soon as possible after any rainfall event or accumulation of wastes reduces such storage capacity...”. This would include manure solids accumulation within an RCS.

AOC 2 - Berm maintenance is required at two locations to ensure that storm water runoff from the cattle pens is directed into one of the RCSs during the 25-yr/24-hr rain event. The south side of the clean storm water diversion arroyo (see Photo 3) requires berm improvement/maintenance to ensure that pen area runoff does not enter the arroyo. The second location is at the south-west corner of the cattle pens which should direct production area storm water runoff into RCS D. The dairy shall prevent any discharge of manure or process wastewater pollutants into waters of the U.S. by ensuring proper design, construction, operation of maintenance to contain all manure and process wastewater from the 25-yr/24-hr storm event as described in Part II.A.1.a.i.

Section IV – FOLLOW UP

None

Section V – LIST OF APPENDICES

Appendix 1 – Photo Log – Three photos taken 6/07/2022 and Google Maps aerial with locations of significant photographs

Appendix 1

Photograph Log and Site Aerial



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Del Oro Dairy		
City: Anthony	County: Dona Ana	State: New Mexico



Photo File Name: DSCN0734.JPG

Date of Photo: 06/07/2022

Time of Photo: 0929

Photographer: Lucas Bomar

Description: RCS A receives influent flows from the manure screen. This lagoon then overflows into RCS B from which recycle water is drawn to flush the cow holding area prior to the cows going into the milking parlor. RCS A is full of solids and either needs to be assessed by an engineer for wastewater capacity and solids accumulation, or have solids removed from the unit and give them to a third party. The view is toward the north.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Del Oro Dairy		
City: Anthony	County: Dona Ana	State: New Mexico



Photo File Name: DSCN0735.JPG

Date of Photo: 06/07/2022

Time of Photo: 0958

Photographer: Lucas Bomar

Description: RCS C is shown, and RCS D is in the distant background. All the RCS units have depth markers and are fully fenced. The HDPE liners were in good condition with regular annual maintenance. The view is toward the south.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Del Oro Dairy		
City: Anthony	County: Dona Ana	State: New Mexico



Photo File Name: DSCN0736JPG

Date of Photo: 06/07/2022

Time of Photo: 1026

Photographer: Lucas Bomar

Description: Berm maintenance is needed on the south side of the clean storm water diversion arroyo to ensure that runoff from the 25-yr/24-hr rain event is kept out of the arroyo and that it is channeled to one of the storm water RCSs. The view is toward the west.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Del Oro Dairy		
City: Anthony	County: Dona Ana	State: New Mexico

Del Oro Dairy Google Map aerial and significant photo locations

