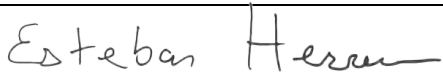


**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	5/28/19		
Media:	Water		
Regulatory Program(s)	NPDES		
Company Name:	N/A		
Facility Name:	Wildcat Dairy, LLC		
Facility Physical Location:	600 County Road 252 (31.78579, -98.43964)		
(city, state, zip code)	Gustine, TX 76455		
Mailing address:	600 County Road 252		
(city, state, zip code)	Gustine, TX 76455		
County/Parish:	Comanche County		
Facility Contact:	David Volleman	Son of Owner	
	david@wildcatmilk.com , frank@wildcatmilk.com , cmullin@enviroag.com		
FRS Number:	N/A		
Identification/Permit Number:	TXG921255		
Media Number:	N/A		
NAICS:	112120		
SIC:	0241		
Personnel participating in inspection:			
Juan Ibarra	EPA Region-6 ECD-WA	Inspector	214-665-8493
David Volleman	Wildcat Dairy	Son of Owner	325-667-7266
Corey Mullin	EnviroAg	Consultant	254-485-3892
EPA Lead Inspector Signature/Date			
	{Inspector name}		Date
Supervisor Signature/Date			7/3/2019
	{Supervisor name}		Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Juan Ibarra, arrived at Wildcat Dairy at 0945 on 05/28/2019 for an unannounced inspection. I met with the facility owner's son, David Volleman, and their consultant Corey Mullin (of EnviroAg) at the opening conference. I presented my credentials to Mr. Volleman 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) General 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. Mullin accompanied me for the entirety of the inspection.

FACILITY DESCRIPTION

Wildcat Dairy is a permitted facility that confines approximately 5891 cattle (of which 1256 are dry cows and 15 calves). At the time of the inspection, according to Mr. Volleman, the facility was milking 4620 cows. The cows are milked twice per day and between sessions most are kept inside of a large multi-lane ventilated freestall barn or in four traditional freestalls. Dry cows are kept in open lots which are located adjacent to the facility's ventilated freestall barns.

The freestall lanes are vacuumed with a honey wagon that dumps the manure slurry into either the Slurry/Manure Drying Area or into one of two settling basins (with certified clay liners) called Slurry Basin #2 or Surge Pond #3. The Slurry Manure Drying Area operates like a cattle pen with compacted manure base. Manure is temporarily stored within this area just long enough to dry and is then removed. This dried manure is given away and trucked off-site (see Attachment 1 Photolog, photo 4). Additionally, some wastewater is given to a neighboring property equipped with a center pivot.

The milk parlor is flushed with clean well water. This flush water discharges into the Settling Basin which is cleaned about once every three years. From the settling basin, wastewater flows into two Retention Control Structures (RCS) that operate in series. RCS 1 is followed by RCS 1-Expansion which have a total combined capacity of 111.07 acre-feet.

All wastewater is pumped out of RCS1-Expansion for land application via center pivot to Land Management Units (LMU)s 1, 2, 3 and 4. Three other LMUs (1A, 2A and 4A) are available for slurry application, however, these fields are rarely used. Composted manure is used to decompose mortalities. The compost area is located upslope of and within the drainage area of RCS 1-Expansion. Silage is stored in large plastic socks or in plastic covered bunkers (see photos 5 and 6), while commodities are stored under roofed bunkers.

Section II - OBSERVATIONS

Wastewater Management and Retention Control Structures

On the day of the inspection I found that the wastewater level in RCS 1-Expansion lagoon was one foot over the 25-yr/24-hr rain event mark as shown on the pole marker and based on site records of lagoon measurements. The two lagoons appeared to be very well constructed and managed, with RCS 1-Expansion having greater than six feet of freeboard. Additionally, the berms on the dairy site were well designed and constructed. Berms and lagoon embankments were well maintained and covered with dense vegetation. The entire dairy site including the lagoon embankments were well mowed.

While the milking parlor was flushed with fresh well water and discharged to the certified clay lined Settling Basin, freestall waste was picked-up with a vacuum truck and discharged either into one of the two slurry pits (Slurry Basin #2 and Surge Pond #3) or into the manure drying area. I saw a tractor cleaning out the manure drying area and piling up the dried manure to prepare it for off-site removal. The manure drying area was very well managed. Open pens were also contained within the watershed of RCS 1 and RCS 1-Expansion (photo 10). All of the production area was well designed and constructed to contain runoff within the waste management structures of the dairy.

Manure Composting and Mortality Management Area

Manure solids were stored as windrows in either the Slurry/Manure Drying Area or in the Composting Area located southeast of RCS 1-Expansion. Manure contained within the Slurry/Manure Drying Area was neatly arranged in dried windrows and I observed a tractor working this area during the inspection. The Slurry/Manure Drying Area appeared to be very well managed.

The manure windrows being used for mortality composting were bermed to direct wastewater into RCS 1. This manure/mortality composting area also appeared to be well managed (photo 9).

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. LMU 2 was the last field to which wastewater was land applied on 5/16/2019, approximately 12 days prior to the EPA site inspection.

Silage and Commodities Storage

On the day of the inspection I observed the commodity storage barns to be in good condition. I also observed the covered silage bunkers and silage socks. Additionally, at the time of the inspection a new silage bunker was being constructed from the recently harvested winter wheat (photos 5 – 6).

Records Review

During the site inspection, I reviewed the Nutrient Management Plan records to verify that the lagoons were properly designed and constructed, that they were recently certified, the lagoon level records were maintained, and that the land application records were accurate. The previous two years of LMU

records showed that all the soils had a P2O5 concentration below 188 ppm for 2017, and below 160 ppm in 2018. Additionally, the dairy consultant (EnviroAg) maintained land application records for the applied wastewater on a per field and per application basis to show that these were being done at the crop's agronomic rate. Other records on manure and wastewater transferred off-site, crop harvest, rainfall, site maps and maintenance were also being appropriately managed and recorded.

Section III – AREAS OF CONCERN

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

1. The wastewater level in RCS 1-Expansion was approximately one foot above the 25-yr/24-hr rain event mark per TXG 921255 Part III.A.10 (a)(1).

Section IV – LIST OF APPENDICES

Appendix 1 – Photo Log – 11 photos taken 05/28/2019 and 1 aerial image of significant photo locations

Appendix 1

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Wildcat Dairy, LLC		
City: Gustine	County: Comanche	State: Texas



Photo File Name: DSCN4636.JPG

Date of Photo: 05/28/2019

Time of Photo: 1140

Photographer: Juan Ibarra

Description: Looking north inside the ventilated freestall. The barn had curtains to help channel the air for cross ventilation.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Wildcat Dairy, LLC		
City: Gustine	County: Comanche	State: Texas



Photo File Name: DSCN4637.JPG

Date of Photo: 05/28/2019

Time of Photo:

Photographer: Juan Ibarra

Description: Looking south at the dairy's Surge Pond 3. This is a clay lined lagoon which is cleaned out approximately every three years.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Wildcat Dairy, LLC		
City: Gustine	County: Comanche	State: Texas



Photo File Name: DSCN4638.JPG

Date of Photo: 05/28/2019

Time of Photo:

Photographer: Juan Ibarra

Description: Looking south at the dairy's Slurry Basin 2. This is the second of two slurry pits which was located east of Surge Pond 3.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Wildcat Dairy, LLC		
City: Gustine	County: Comanche	State: Texas



Photo File Name: DSCN4639.JPG

Date of Photo: 05/28/2019

Time of Photo:

Photographer: Juan Ibarra

Description: Looking southwest at the windrow preparation occurring at the manure drying area.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Wildcat Dairy, LLC		
City: Gustine	County: Comanche	State: Texas



Photo File Name: DSCN4640.JPG

Date of Photo: 05/28/2019

Time of Photo:

Photographer: Juan Ibarra

Description: Looking south at freshly harvested silage being built into a stockpile.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Wildcat Dairy, LLC		
City: Gustine	County: Comanche	State: Texas



Photo File Name: DSCN4641.JPG

Date of Photo: 05/28/2019

Time of Photo:

Photographer: Juan Ibarra

Description: Looking northeast at the new silage stockpile.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 7

Location: Wildcat Dairy, LLC		
City: Gustine	County: Comanche	State: Texas



Photo File Name: DSCN4642.JPG

Date of Photo: 05/28/2019

Time of Photo:

Photographer: Juan Ibarra

Description: Looking south at the Settling Basin with RCS 1 and RCS 1-Expansion in the background.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 8

Location: Wildcat Dairy, LLC		
City: Gustine	County: Comanche	State: Texas



Photo File Name: DSCN4643.JPG

Date of Photo: 05/28/2019

Time of Photo:

Photographer: Juan Ibarra

Description: Looking north at RCS 1-Expansion. Note the pole marker and the greater than six feet of freeboard. Note the well mowed and maintained embankment.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 9

Location: Wildcat Dairy, LLC		
City: Gustine	County: Comanche	State: Texas



Photo File Name: DSCN4644.JPG

Date of Photo: 05/28/2019

Time of Photo:

Photographer: Juan Ibarra

Description: Looking east-southeast at the mortality/composting area. This area is bermed to drain to RCS 1. Note the well mowed RCS 1- Expansion embankment seen in the foreground.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 10

Location: Wildcat Dairy, LLC		
City: Gustine	County: Comanche	State: Texas



Photo File Name: DSCN4645.JPG

Date of Photo: 05/28/2019

Time of Photo:

Photographer: Juan Ibarra

Description: Looking north at the dry cow pens, which like the manure/mortality composting area, drains by bermed channel into RCS 1.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 11

Location: Wildcat Dairy, LLC		
City: Gustine	County: Comanche	State: Texas



Photo File Name: DSCN4646.JPG

Date of Photo: 05/28/2019

Time of Photo:

Photographer: Juan Ibarra

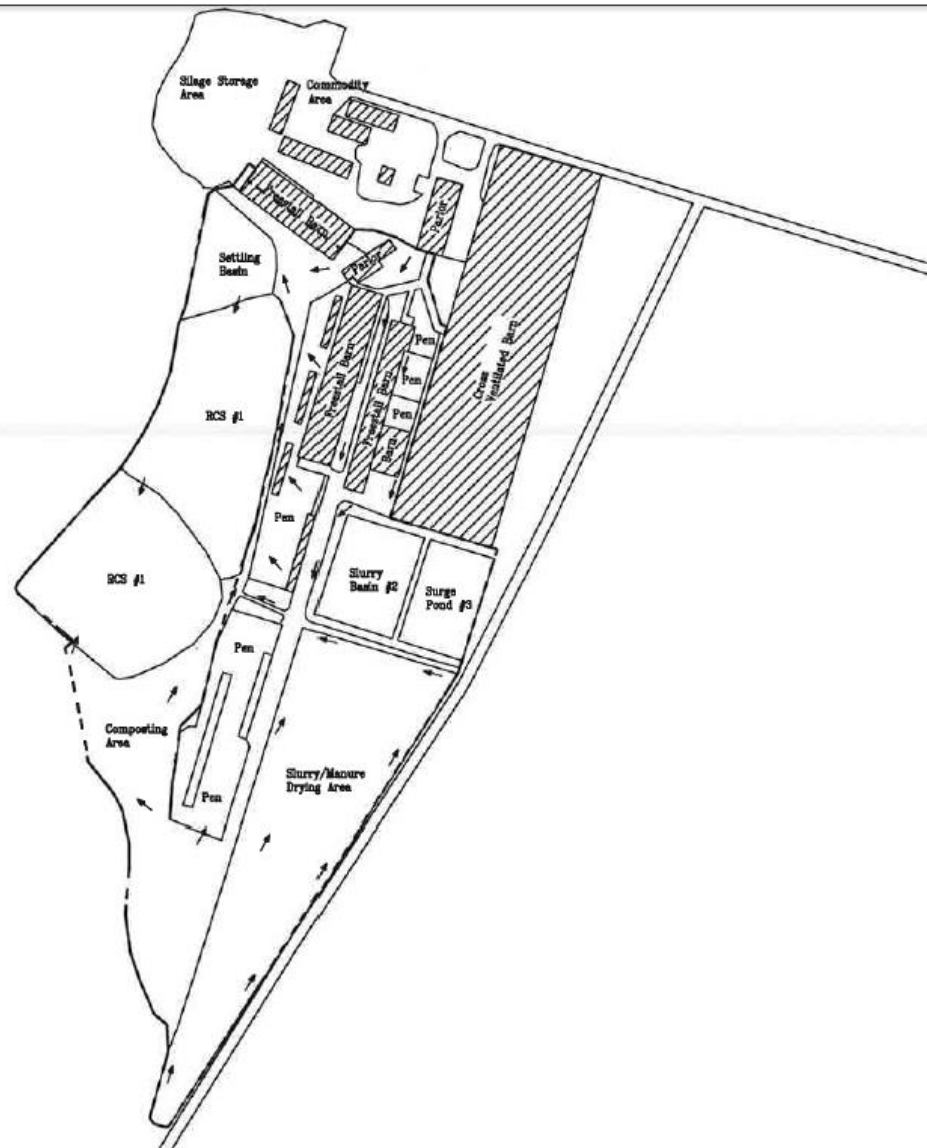
Description: Looking southwest at LMU 2 which is equipped with a center pivot. This is the last field to which wastewater was applied on 5/16/2019. A small drainage way is located in the foreground, upslope of the grade of the land and buffered from the application pivot.

Wildcat Dairy, LLC

Site Map with Significant Photo Locations



Wildcat Dairy, LLC Schematic



Map Revised 1/26/2016

LEGEND:

- Denotes Drainage Area/Berm
- //// Denotes Barns/Roofed Areas

