UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
Four Penn Center
1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

Report Title:	Clean Water Act Compliance Inspection Report
Inspection Date(s):	10/12/2022
Regulatory Program(s):	National Pollutant Discharge Elimination System (NPDES)
Type of Activity:	Concentrated Animal Feeding Operation (CAFO)
Site/Facility Name:	Dream Farms CAFO
Permittee(s):	Brian Brechbill & Allen Rice
Site/Facility Owner:	Allen Rice & Brian Brechbill
Site/Facility Operator:	Allen Rice
Site/Facility Address:	13689 Dream Highway Newburg, PA 17240
Latitude:	40.092158 **Longitude:** -77.593931
County/Parish:	Franklin County, PA
Permit Number:	PAG123743
NAICS Code:	121111 **SIC:** 0241
Unique Project #:	3E23WN009A

Site/Facility Representative(s)*: **Point of Contact**

Allen Rice ☒
Phone: (717) 477-0992 Email: allenr@dreamheifers.com

EPA Inspectors:

Mark Zolandz
Phone: (215) 814-2319 Email: zolandz.mark@epa.gov
Mike Greenwald
Phone: (215) 814-2398 Email: greenwald.michael@epa.gov

State/Local Inspectors*:

Krista Crone, Pennsylvania Department of Environmental Protection (DEP)
Phone: (717) 705-4761 Email: krcrone@pa.gov
Kate Bresaw, Pennsylvania Department of Environmental Protection (DEP)
Phone: (717) 772-5650 Email: kbresaw@pa.gov
Amy Scull, Pennsylvania Department of Environmental Protection (DEP)

*See Page 3 for a list of additional attendees

Report Preparer Signature/Date

MARK ZOLANDZ
Digitally signed by MARK ZOLANDZ
Date: 2023.01.04 11:34:14 -05'00'

Mark Zolandz, NPDES Section Date

Supervisor Signature/Date

STACIE PRATT
Digitally signed by STACIE PRATT
Date: 2023.01.04 16:49:55 -05'00'

Stacie Pratt, Chief, Water Branch Date

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List of Attachments

I. Introduction

On October 12, 2022, an inspection team composed of staff from the U.S. Environmental Protection Agency ("EPA") Region III and the Pennsylvania Department of Environmental Protection ("DEP") (hereinafter, "Inspection Team") conducted a Concentrated Animal Feeding Operation (CAFO) Inspection of the Dream Farms CAFO site (hereinafter, "the facility"). The purpose of the inspection was to observe compliance with the Clean Water Act (CWA) and to verify compliance with the site's coverage under National Pollutant Discharge Elimination System (NPDES) Permit No. PAG123743 (hereinafter, the "Permit") and applicable State and Federal regulations. NPDES Permit PAG-12 is Pennsylvania's NPDES General Permit for Operation of Concentrated Animal Feeding Operations.

A. Inspection Opening Conference

The Inspection Team arrived at the site at approximately 12:00 p.m. for the inspection. Inspectors met with the following site representatives:

Table 1: Inspection Attendee List

Name	Affiliation	Telephone	Email
EPA Region III Inspectors and Contractors			
Mark Zolandz	EPA Region III	(215) 814-2319	zolandz.mark@epa.gov
Mike Greenwald	EPA Region III	(215) 814-2398	greenwald.michael@epa.gov
Site/Facility Representatives			
Allen Rice	Dream Farms	(717) 477-0992	allenr@dreamheifers.com
Darren Shenk	DShenk Consulting, LLC	(717) 629-7737	darren@dshenkconsulting.com
State or County Representatives			
Krista Crone	PADEP	(717) 705-4761	krcrone@pa.gov
Kate Bresaw	PADEP	(717) 772-5650	kbresaw@pa.gov
Amy Scull	PADEP		
Jennifer Bratthauar	Franklin County Conservation District	(717) 264-5499, ext. 105	jbratthauar@franklinccd.org
Jonathan Ott	Franklin County Conservation District	(717) 264-5499	jott@franklinccd.org

Mark Zolandz displayed their credentials to Mr. Allen Rice at the outset of the inspection, and explained the purpose of the inspection was to assess the site's compliance with its NPDES Permit. A copy of the NPDES General Permit PAG123743 is provided in Attachment D.

B. Weather and Precipitation Conditions

During the inspection, the weather was sunny and warm. The nearest National Oceanic and Atmospheric Administration (NOAA) National Weather Service precipitation data for the date of the inspection and 5 days prior are provided in Table 2 below:

Table 2. Precipitation Data

Station Name	Date	Precipitation Amount (inches)[1]
CARLISLE 7.2 SSW, PA US	10/07/2022	0.0
CARLISLE 7.2 SSW, PA US	10/08/2022	0.0
CARLISLE 7.2 SSW, PA US	10/09/2022	0.0
CARLISLE 7.2 SSW, PA US	10/10/2022	0.0
CARLISLE 7.2 SSW, PA US	10/11/2022	0.0
CARLISLE 7.2 SSW, PA US	10/12/2022	0.0

C. Summary of the Site/Facility

The facility is a heifer raising operation located in Newburg, Pennsylvania. The facility consists of numerous calf hutches, multiple calf barns, and 6 heifer barns (referred to as Big Barns 1-6). The facility also includes multiple manure conveyance and treatment systems, including the solids separator building and equipment, settling cells, stage 1 lagoon, and stage 2 lagoon. The facility also includes a mortality composting area, solids stacking pads and drainage collection systems, feed bunkers, and silage storage area.

II. Site/Facility Activity

The facility is a heifer raising operation that is contracted to raise calves and heifers from other dairy operations to breeding age. The facility raises approximately 1,800 dairy heifers and approximately 1,800 dairy calves at a time. Each week, approximately 100 calves are brought to the facility and approximately 100 pregnant heifers leave the facility. Calves are raised in individual pens with calf hutches as well as calf barns. Heifers are raised in six heifer barns. After approximately 20 months, the bred heifers leave the facility and return to their owner's farms. Mortalities are composted on-site.

The Inspection Team conducted a walkthrough of the facility to determine compliance with the CAFO Permit requirements. The observations from the inspection are described below in the Observations section. Photographs were taken during the inspection by Mike Greenwald and are provided in Attachment B.

[1] Source: NOAA National Climatic Data Center (http://www.ncdc.noaa.gov/).

III. Observations

The facility is permitted for 1,800 dairy heifers and 1,800 dairy calves (2,562.30 AEUs).

> **Observation #1:** At the time of the inspection, the facility was raising approximately 1,877 dairy heifers and 1,923 dairy calves (2,684.66 AEUs).

The production area consists of numerous calf hutches, multiple calf barns, and 6 heifer barns (referred to as Big Barns 1-6). The production area also includes multiple manure conveyance and treatment systems, including the solids separator building and equipment, settling cells, stage 1 lagoon, and stage 2 lagoon. The production area also includes the mortality composting area, solids stacking pads and drainage collection systems, feed bunkers, silage storage area, and sawdust storage shed.

Calves are brought to the facility at approximately 2-7 days old, once per week. Calves are placed in individual pens with calf hutches (Photographs 17-18) where they spend approximately 68-70 days. Calves are kept on sawdust bedding in summer and straw bedding in winter. Spent bedding is cleaned out and stacked on the spent bedding stacking pad located between the calf barns and the heifer barns (Photographs 6 and 9).

After approximately 70 days, calves are moved from the individual pens into group pens in the calf barns (Photographs 5, 10 and 15-16). Calves are kept on sawdust bedding in summer and straw bedding in winter. The calf barn alleys are scraped and the manure and bedding are stacked on a stacking pad at the end of each calf barn (Photographs 7-8 and 13-14). The calf barn alleys are scraped five times per week in summer and three times per week in winter.

> **Observation #2:** Each stacking pad has an inlet (Photograph 14) that drains to the stage 1 lagoon (Photograph 29).

After approximately 120 days, calves are moved to the heifer barns, starting at Big Barn 1 and moving through sequentially to Big Barn 6 as the heifers age (Photographs 2-4 and 54). Heifers are kept on separated solids for bedding, with bedding being refreshed once per week. The Big Barns are flushed four times per day, and the flushed manure is sent to the solids separator.

After approximately 20 months, the bred heifers leave the facility and return to their owners' farms.

Liquid manure from the stage 2 lagoon is used to flush the six heifer barns into a center drain (Photograph 41). The liquid manure from the heifer barns flows by gravity to the solids separator building (Photograph 24). Solids are separated from the liquid manure and stacked on a concrete pad outside the solids separator building where it is dried for bedding (Photograph 34). Once it is dry, solids are stack on a solids stacking pad at the east end of Big Barn 3 until it is placed inside the barns.

> **Observation #3:** Runoff from the solids stacking pad is collected through a pit (Photograph 35) and an inlet (Photographs 36-37) and sent to the stage 1 lagoon.

The remaining liquid manure from the solids separator flows to one of two settling cells (Photographs 25-26, 33, and 38) for additional solids settling and removal. After the settling cells, the liquid manure flows into the stage 1 lagoon.

The stage 1 lagoon is a clay-lined earthen lagoon with a capacity of approximately 1 million gallons (Photograph 27). When the manure level reaches 8 feet in the stage 1 lagoon, a float pump is activated and manure is pumped to the stage 2 lagoon. The stage 1 lagoon has an underdrain pipe but does not have a leak detection system.

Observation #4: Stage 1 lagoon did not have depth marker.

Observation #5: Stage 1 lagoon is set to pump to stage 2 lagoon once stage 1 lagoon reaches 8 feet of manure. At the time of the inspection, the stage 1 lagoon had recently been pumped out and the pump float had not been placed back into position (Photograph 28).

Observation #6: Stage 1 lagoon has an underdrain system (Photographs 30-32). At the time of the inspection, the liquid coming from the underdrain pipe was clear.

The stage 2 lagoon is a clay-lined earthen lagoon with a capacity of approximately 10 million gallons (Photographs 42 and 46). Manure in the stage 2 lagoon is pulled off the top to fill the flush tanks for the heifer barns. Manure in the stage 2 lagoon is pulled from the bottom for land application. The stage 2 lagoon does not have an underdrain or a leak detection system.

Observation #7: Stage 2 lagoon has a depth marker consisting of grindings in a concrete curb along the ramp (Photographs 47-48). At the time of the inspection, there was approximately 4 feet of freeboard in the stage 2 lagoon.

Observation #8: Stage 2 lagoon does not have an underdrain system.

Mortalities are composted on-site on the concrete pad next to the solids separator building using separated solids.

Observation #9: Runoff from the composting area is collected through a pit (Photograph 35) and an inlet (Photographs 36-37) and sent to the stage 1 lagoon.

Mortality compost and other solids to be exported off site are stacked in a solids stacking area located to the north of Big Barn 1 until it is picked up and exported (Photograph 43).

Silage is stored in several covered piles in the feed storage area (Photographs 49 and 52-53). Other types of feed are stored in feed storage bins adjacent to the silage storage area (Photographs 50-51).

There are two stormwater ponds located at the facility. One stormwater pond is located to the south of the heifer barns and receives runoff from the driveways and around the buildings on the south side of the facility. The other stormwater pond (Photographs 20 and 23) is located to the north of the calf barns and receives runoff from around the calf barns and from a drainage pathway on the south side of the stage 1 lagoon, settling cells, and solids separator building (Photograph 21).

IV. Records Review

During the inspection, the Inspection Team requested and/or reviewed the Facility's nutrient management plan (NMP), land-application records, CAFO self-inspection reports, manure test results, soil test results, and agricultural erosion and sediment control plans (Ag E&S Plans) and conservation plans.

Observation #10: The facility's current Ag E&S Plan/Conservation Plan was not available on-site at the time of the inspection. An older Ag E&S Plan dated November 8, 2010 was on-site (Photograph 55).

Observation #11: The facility did not maintain records of daily inspections of drinking water lines. The facility stated that they do these inspections, but no records are maintained. The facility was using an older inspection form. DEP provided a newer form for the Facility to use moving forward which includes daily inspections of drinking water lines.

Observation #12: The facility's land application records do not identify the weather conditions at the time of land application and for 24 hours prior to and following application.

Observation #13: The facility's land application records do not identify the method used to apply manure.

Observation #14: It is unknown whether or not the facility completes a CAFO Manure Exportation Report form following manure transfers off-site.

V. Closing Conference

After the facility inspection, the Inspection Team met with the site representatives for a closing conference. The Inspection Team shared preliminary observations with the site representatives. The EPA inspector also requested that the facility provide electronic copies of the following documents to EPA:

- Crop Year 2021-2022-2023 NMP
- Current Ag E&S Plan/ Conservation Plan (which was not available on-site)

The inspection concluded at approximately 3:00 p.m.