CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose:
Compliance Evaluation Inspection

Facility:
Cold Springs Egg Farm
W2024 State Highway 59
Palmyra, Wisconsin 53156
Jefferson county, Wisconsin
42.288275, -88.64535
NPDES Permit Number: WI-0056537-06-0

Date of Inspection: Walk-through completed on September 27, 2022, and interview completed on October 5, 2022.

EPA Representatives:
Cheryl Burdett, CAFO Program Manager, 312-886-1463 burdett.cheryl@epa.gov
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Danielle Block danielle.block@wisconsin.gov
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Facility Representatives:
David Hill, Facility Manager, 262-495-6220 dhill@sreggfarm.com
Nina Carns, Consultant, ncarns1@outlook.com

Inspector Signature CHERYL BURDETT Digitally signed by CHERYL BURDETT Date: 2022.12.02 13:13:02 -06'00'

Approver Signature and Date:
Ryan Bahr Digitally signed by Ryan Bahr Date: 2022.12.05 08:54:20 -06'00'

1. BACKGROUND

The purpose of this report is to describe, evaluate and document S&R Egg Farm, Inc. compliance with their Wisconsin Pollutant Discharge Elimination System Permit (WI-0056537) and with the Clean Water Act (CWA) at their Cold Spring Egg facility located in Palmyra, Wisconsin on September 27, 2022, and October 5, 2022. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

S&R Egg Farm, Inc is comprised of four facilities: S&R Egg Farm., Cold Spring Egg , B Farm, and Genesee Farm. These four facilities are defined as a large CAFO covered under one permit WI-0056537.

Cold Spring Egg is an egg-laying operation. At the time of inspection, Cold Spring Egg was recovering from the Avian Flu.

Surface runoff from Cold Spring Egg flows into Spring Hollow which flows to Bark Creek. Bark Creek flows into Rock Creek, which flows to the Mississippi River, a traditional navigable waterway.

2. SITE INSPECTION

Table 1: Site Entry and Opening Conference

Arrival Time:	Arrived at Cold Spring Egg at 12:00 p.m.
Departure Time:	3:30 p.m.
Temperature:	65 degrees Fahrenheit
Precipitation:	No precipitation.
GPS Reading (at Parking Area)	East of the Generator Building. 42.883889, -88.643611
Presented credentials?	Yes.
Credentials presented to whom and at what time?	David Hill, S&R Egg Farm, Inc. Facility Manager.
EPA conducted their opening conference with Mr. David Hill, Facility Manager, Nina Carns, Consultant, and Wisconsin Department of Natural Resources (WDNR). EPA explained that they were there to conduct an inspection to determine compliance with the Clean Water Act and WPDES Permit WI-0056537. EPA was aware that because of their biosecurity procedures EPA would not be able to conduct an on-site records review at S&R Egg for 72 hours after conducting the inspection at Cold Spring Egg. EPA explained that we would conduct another inspection later to go over records and conduct walk-throughs of the two remaining facilities. EPA had already received documents through an Information Request submitted by S&R Egg Fam, Inc. in 2021 and information provided by WDNR. EPA explained that photographs would be taken of the walk-around of Cold Spring Egg. If Mr. Hill determined that any information that was collected during the walk-through was considered Confidential Business Information (CBI), EPA would protect the information as required under CBI.	
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?	No.

Which information does the facility consider to be CBI?	None at the time of the inspection.
EPA vehicle parked in approved location.	Yes. Approved by Mr. David Hill
Location where EPA vehicle was parked?	Photograph P9270062
Disposable boots worn?	Yes.
Other bio-security measures taken (state vet contacted, etc.):	Facility provided Tyvek suits that were worn at B Farm and removed along with our yellow rubber boots and left at B Farm. A new Tyvek Suit was provided and worn along with new yellow rubber boots when we arrived on site at Cold Spring Egg.

WPDES Permit Number	WI0056537
WPDES Issuance	2/1/2018
WPDES Expiration	12/31/2022
Facility Name	S&R Egg Farm, Inc.
Facility Owner	The owner information was obtained from the response to the Information Request. The following are co-owners of S&R Egg Farm, Inc. Al Schimpf Frank Schimpf Helga Schimpf
Facility Operator	David Hill, Facility Manager of S&R Egg Farm, Inc.
Mailing Address	N9416 Tamarack Road Whitewater, Wisconsin 53190
Physical Address	Cold Spring Egg W2024 State Highway 59 Palmyra, Wisconsin 53156
County	Jefferson County
Contact Person	David Hill
Phone Office **Phone Cell**	262-495-6234 920-723-4063
Email	dhill@sregg@farm.com

Person Present During the Inspection	David Hill, Facility Manager Nina Carns, Consultant
Does the Facility Owner/Operator own and/or operate any other animal feeding operations?	Yes.
All the poultry operations are covered under one permit S&R Egg Farm, Inc.	
Cold Spring Egg	
B Farm	
Genessee Farm	

2.1 Records Review (The following Records Review tables reflect information provided before the walk-through of the facility, unless otherwise noted.)

Table 2: Documents

Checklist(s) Used
R5 CAFO Inspection Checklist
Facility Documents Reviewed:
Following Documents received from 308 Information Request: –
Question 1-2: Owner information
Question 3: 20210729-SR Egg Tamarack Cooler Building
ACAD-16390-Genesee 2016-ALTA 1
Cold Spring EC SWMP Question 3
Question 4: Compliance Check Reports – only received 2018, but WDNR provided the other requested documents.
Question 5 – 2018
Annual Spreading Report
Application Rates
CAFO Calendar- 2018
Inspection Records
Manure Analysis
Manure Spill Report
Manure Totals
NMP Update 3400
Nutrient Management Report
Restriction Maps Statement
Restriction Maps
Soil Test Report
Wash Water Sales
Question 6:

CS DEC20
CS JAN2018
CS JAN2019
CS monthly August
NM Statement
SR DEC20.xls.
SR JAN2018.xls.
SR JAN2019.xls.
SR monthly August
Question 7, 8, 9:
Confidentiality Statement
Copy of CS and SR Sales 18-21 A. XLS.
Definition.docx

Table 3: Facility Description

Type of Animal	**Number of Animals**	**# Of Birds**	**Capacity**	**Type of Confinement**
Laying Hens	Barn 1	Under Construction no birds	Mr. Hill was not sure of the capacity of Barn 1.	Under roof
Laying Hens	Barn 2	Mr. Hill stated approximately 294,870.	Mr. Hill estimated total capacity of Barn 2 as 295,000.	Under roof
Laying Hens	Barn 3	Mr. Hill stated this Barn is empty	Mr. Hill was not sure of the capacity, at the time of the inspection.	Under roof
Laying Hens	Barn 4	Mr. Hill stated that Barn 4 had approximately 229,504 without specifying if it was for 4A or 4 B or total.	Mr. Hill estimated that the capacity of Barn 4 is 232,000.	Under roof

Laying Hens	Barn 5	Mr. Hill stated that it was empty on 9/27/2022.	Mr. Hill was not sure of the capacity, at the time of the inspection.	Under roof
Laying Hens	Barn 6	.	Mr. Hill was not sure of the capacity of this barn at the time of the inspection.	Under roof
Laying Hens	Barn 6A	Estimates approximately 242, 000	Mr. Hill was not sure of the capacity at time of the inspection.	Under roof
Laying Hens	Barn 7	On 9/27/202, I recorded that this barn was empty.	Mr. Hill was not sure of the capacity at the time of inspection.	Under roof
Laying Hens	Barn 8	On 9/27/2022, had approximately 215, 872.	Mr. Hill was not sure of the capacity at the time of inspection.	Under roof
Laying Hens	Barn 9	Mr. Hill stated this barn was empty	Mr. Hill was not sure of the capacity at the time of the inspection.	Under roof
Laying Hens	Barn 10	Mr. Hill stated this barn was empty.	Mr. Hill was not sure of the capacity at the time of the inspection.	Under roof
Laying Hens	Barn 11	Mr. Hill stated approximately 76,652 birds.	Mr. Hill was not sure of the capacity at the time of the inspection.	Under roof

Laying Hens	Barn 12A Barn 12 B Barn 12C	On 9/27/2022, Mr. Hill stated 12,746 birds. without specifying if that was on each floor of Barn 12 or just Barn 12 A.	Mr. Hill stated that each floor could hold approximately 55,000 birds.	Under roof
Minimum Number of Animals in previous 5 years:				The birds at Cold Spring Farm were exposed to the Avian Flu, so the facility in the spring of 2022 had zero birds. It was just starting to repopulate at the time of EPA's inspection.
Maximum Number of Animals in previous 5 years:				Mr. Hill estimated that the maximum capacity of egg-laying birds was 2.92 million birds.
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:				On September 27, 2022, Mr. Hill estimated that Cold Spring Egg had approximately 765,644. This was due to Cold Spring Egg having been hit with the Avian Flu in spring of 2022.
Amount of Liquid Manure Generated per year:				Currently, no liquid manure is generated at Cold Spring Egg.

Amount of Solid Manure Generated per year:	Mr. Hill stated that when Cold Spring Farm is at maximum bird capacity (approximately 2.92 egg-laying birds) and manure is at 75% moisture - 96,500 wet tons. When the manure is dry and at 16-18% moisture - 44,412 dry tons of manure.
Does the facility have an NPDES Permit?	Yes
SIC or NAICS code:	025
CAFO Designation/Defined Date (If a designated CAFO)	CAFO
Do animals have direct access to WOUS?	No
Are crops, vegetation, forage growth, or post-harvest residues sustained in the normal growing season over any portion of the lot or facility where animals are kept?	No
What is the area (acres) of the production area?	Approximately 50 acres.
What is the area (acres) of the pasture?	No.
How many employees (not counting family members)?	At the time of inspection, they had approximately 30 employees at cold spring egg. However, when they start the egg-processing plant back up they have approximately 60 employees.

Table 4: Permitted Manure and Process Wastewater Storage Structures

Storage ID	Wastewater Type	Size	Wastewater Source	Capacity	Changes since 2020 Fire
009	Manure storage ST1 Constructed in 2002 Last evaluated Jan 2016	152' x 80'	Roofed manure storage	182,400 cubic feet of dry manure	This storage area is still in use.
010	Manure Storage ST2 Constructed in 2007 Last Evaluated in Jan 2016	300' x 85'	Unroofed compost storage. This was roofed until fire burned the roof and walls and left the concrete floor and side walls.	510,000 cubic feet of dry manure	Still used as an unroofed solid manure composting area.
011	Manure Storage ST3 – Slab ST3 Constructed in 1997 Last evaluated on January 11, 2016	133' x 278'	Unroofed	367,000 cubic feet	Removed. After the fire, this was taken out and a new Manure Storage Building and Pellet operation is replacing it.
012	Manure Storage ST4 Constructed in 2000 Last evaluated by January 11, 2016	95' x 200'	Roofed	3000 tons (141,000 cubic feet)	Removed. After the fire, this was taken out and a new Manure Storage Building and Pellet operation is replacing it.
013	Leachate Pond L1 – Collected manure runoff from ST3 Constructed 1997	Not sure of the dimension.	earthen manure storage structure.	430,000-gals	Removed. After the fire, this was taken out and a new Manure Storage Building and Pellet operation is replacing it.

	Last evaluated on December 19, 2016.				
014	Biofilter Process Wastewater	25,000-gal ply tanks.	Water reclaimed from biofilter which is land applied.	Roofed structure near the bio-filter.	Still in place. The wastewater is land applied.
015 Installed in 2002	Egg wash water and wash water	20,000-gallon tanks	Generated from the cleaning and processing of the eggs prior to packaging and stored under roof	– Poxy steel-lined tanks – process plant.	Still being used for egg wash water. It has approximately four days of storage.

Records at site of storage structure design?	EPA reviewed storage structure design plans submitted during the Information Request.
Is manure stored for the short term? If yes, describe where it is stored, how it is drained and where it drains to.	Yes, there are approved fields for headland stacking.
Are records kept of the level of manure in the storage structures?	No. It does not apply for solid manure. There are no liquid manure storage structures on-site.
When was the last time a storage structure was emptied, either partially or completely?	It is partially emptied in the spring and fall or as it sold.
What amount of manure or process wastewater was removed the last time the storage structure was emptied, either partially or completely?	At the time of inspection, Mr. Hill was not sure of the amount of manure that was sold as organic fertilizer in the spring. It is recorded on the sale invoices.
Do the facility personnel inspect and keep records of all diversion devices?	Yes. They conduct and record their weekly inspections of their stormwater controls.

Do the facility personnel inspect and keep records of all impoundments?	No. They do not have impoundments.
Do the facility personnel inspect and keep records of all the water lines?	Yes. They provided their daily waterline inspections as part of the Information Request and asked again during the walk-through.
Do the facility personnel perform routine visual inspections and keep records of the production area?	Yes. This information was provided in the Information Request and asked again during the walk-through
Does the waste storage system have a managed outfall or discharge point? If yes, provide a description of the outfall and a description of the area receiving the discharge.	No. The site does not have a managed outfall point.
Has the facility had any documented discharges of livestock waste to surface water in the past year?	No. According to Mr. Hill this Facility has not had a discharge.
Are there safety devices installed around any manure storage ponds? (Barriers at the end of manure push off platforms, fences around pond, signage.)	There are no manure ponds on-site, but there is a clean water pond that has fence around it.

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:
Each of the barns' manure is collected using the manure transfer system. These are belts that run under the bird cages in the barn. The manure stays on these belts which have side dryers blowing on the manure to dry it. The manure stays on the belts for approximately 13 days which will use covered belts to move it to the Silo. It is currently removed manually from the silo, but when the Manure Storage Building is done the bucket elevator in the silo will take the manure to another covered belt which will move it to the Manure Storage Building. In the Manure Storage Building, the manure will be put into Pellet Operation. The Pellets will be put into one-ton bags or crumbled into 1-ton totes.

Barn 11 or Barn 12 have a separate system where the manure goes into a truck and then is dumped into the Silo. The Silo will then convey the manure to the Manure Storage Building as described above. However, an entire Barn is cleaned out when the birds reach 86 to 112 weeks of age. Clean-out requires a front end-loader that puts the manure on the belts to dry and a dry disinfectant.	
Describe the way used bedding is collected and disposed of at the facility:	
No bedding is used in any of the barns.	
Are mortality records kept?	Yes.
Describe the way mortalities are managed at the facility: Check daily and record	
The employee working in the Barn goes through and pulls mortalities every day. The person has a clip board where he records by floor and by row. During the inspection, some of the birds were being composted, but they also landfill the birds.	
What type of method is used to provide drinking water for the animals? **(Drinkers with float system? Nipple waterers? If nipple waterers, is backflow prevention installed?)**	Nipple waterers.
Describe the way spilled drinking water is collected and disposed of at the facility:	
Any water that spilled from the nipple waterers is collected with the manure.	
Describe the way mist cooling water is collected and disposed of at the facility:	
No misting systems.	
Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:	
There is a chemical storage building. Any spill would remain in the building. There are no storage ponds or drains for it to flow into.	
Describe the way water that has been used to wash/flush barns are collected and disposed of at the facility:	
No water is used in the cleaning of the barns. However, the egg processing plant is washed down with hoses daily. This process wastewater goes into the poxy steel lined tanks.	
Describe where water comes from that is used to clean and/or flush. (Wells, city, etc.)	

Wells are used for watering the birds.	
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:	
Feed is contained in silos.	
If a dairy, describe how process wastewater from the plate cooler water is collected and disposed of at the facility:	
Not applicable.	
If a dairy, describe how process wastewater from the cleaning of the milking parlor is collected and disposed of at the facility:	
Not applicable.	
If a dairy, describe how process wastewater from the cleaning of the milk tanks is disposed of at the facility:	
Not applicable.	
If a dairy, how many times per day are cows milked?	Not applicable

Table 6: Land Application and Disposal of Manure and Process Wastewater (Discussed with David Hill on a phone call)

Does the facility perform and keep records of the manure testing?	Yes. This information was provided to EPA as part of the Information Request. The process for manure testing changed due to a fire at the Pellet Building, which burnt down in 2021. Manure is now tested at the ST2 compost site.
When was the last time a sample was taken of the manure and/or process wastewater?	It was last sampled on August 23, 2022.
Describe the process to take the manure and/or process wastewater sample.	The process for sampling the process wastewater was to take samples twice a month by collecting egg wash water from the spigot on the Poxy steel lined tanks. During the

	inspection, they stated that the egg-processing plant was not operating because they were just starting to get birds back in the barns.
Number of acres available for land application:	Mr. Hill estimated that approximately 5200 available, but have a total of 14000 acres in S&R Egg Farm, Inc.
Are land application records kept?	Yes.
Who applies the manure, liquid Manure, and process wastewater to the fields?	S&R Egg Farm, Inc. employees applies process wastewater.
Methods of Liquid Manure application on the fields	Cold Spring Egg does not generate liquid manure.
Method of Solid Manure application on the fields	Solid manure from Cold Spring Egg is either sold as organic fertilizer or as pellets.
Method of Process Wastewater application on the fields	S&R Egg Farm, Inc. uses a truck irrigation gun or a pan spreader.
Are weather conditions at time of application kept? (24 before – 24 after)	This is recorded on the Daily Log Form.
Does the facility perform and keep records of the soil testing?	Yes. This information was provided in the documents with the Information Request and the WDNR provided the 2022 soil test records.
Is manure transferred off-site to another party?	It is sold as fertilizer.
Are manure transfer records maintained?	Invoice records are kept for the sale of the fertilizer.
Do facility personnel perform periodic inspection of land application equipment?	Yes.

Table 7: Receiving Surface Waters

Describe the surface flow pathways:	
Surface Runoff from Cold Spring Egg flows into an unnamed tributary that flows into Spring Creek which flows Scuppernong River which flows to the Bark River and the Rock River that flows to the Mississippi River, a traditional navigable waterway.	
How many months out of the year is there flow in the nearest surface water pathway:	The waterways have consistent flow year-round.

Are there any storm water pathways entering the facility?	There is a perimeter ditch surrounding Cold Spring Egg, so no storm water pathways enter Cold Spring Egg.
Are there any clean water ponds on site?	Yes.
What is the name of the first waterway that is identified as a Traditional Navigable Water (TNW) for surface flow from the facility?	Rock River.
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent, or perennial?	Perennial
Has the surface water pathway nearest to the facility been assessed for water quality?	Yes, Spring Creek has been assessed and is impaired for Total Phosphorus.

Table 8: Nutrient Management Plan

NMP on site?	The NMP is done electronically in Snap+ at S&R Egg, the main facility. The NMP documents all information from the four facilities named above and covered under one WPDES Permit WI-0056537.
Date NMP Submitted:	It was submitted to WDNR around September 2022.
Planner Name/Company:	The NMP is signed by their consultant, Nina Carns with NC Nutrient Management.
Date that the NMP was last updated:	The permit renewal was submitted in September 2022.
Storage Description:	This information was provided in the WPDES Permit.
Amount of Manure Generated:	Mr. Hill was not sure but would look up this information during the records review.
Capacity of Storage:	The manure storage capacity is for over 180 days. The process wastewater storage is four days.
Duration of Storage:	Store the solid manure all year but are consistently removing solid manure and selling it as organic fertilizer.
Amount of Spreadable Land:	Mr. Hill was not sure but could look up the information.
Mortality Management Plan:	It is included as a statement in S&R Egg Farm, Inc. permit.
Clean Water Diversion System:	It is included as a statement in S&R Egg Farm, Inc. permit.
Direct Contact Prevention Plan:	It is included as a statement in S&R Egg Farm, Inc. permit.

Chemical Management Plan:	It is included as a statement in S&R Egg Farm, Inc. permit.
Conservation Practices:	It is included as a statement in S&R Egg Farm, Inc. permit.
Manure Testing Protocols:	It is included as a statement in S&R Egg Farm, Inc. permit.
Soil Testing Protocols:	Yes, the permit identifies requirements for soil testing.
Land Application Protocols:	This is provided in S&R Eggs Nutrient Management Plan.
Does the NMP reflect the current operational characteristics?	The NMP was changing with the Permit renewal, which was going to be different then the NMP provided in the Information Request for years 2017-2021. The new NMP will reflect the changes made to Cold Spring Egg due ot the fire in 2020.
Are the number of acres owned/leased consistent with what is listed in the NMP?	This information was the same.

Record Keeping Requirements for Land application Activities	
Daily Logs recorded using 3200-123A or department approved equivalent	
The dates manure or process wastewater is applied to each field	Yes. This is recorded on the Daily Log Form and entered Snap +.
Fields used	Fields that have been land applied are recorded at the time of the land application on the Daily Log Form and entered into Snap+.
Acres Applied	This is documented on the Daily Log Form.
Manure source or waste type	This is documented on the Daily Log Form.
Spreader volume	This is documented on the Daily Log Form.
Number of Loads	This is documented on the Daily Log Form.
Whether the soils were dry, wet, saturated, frozen or snow covered at the time of application	This is documented on the Daily Log Form.
Weather conditions at time of application	This is documented on the Daily Log Form.
Whether manure was injected, incorporated, or surface applied	This is documented on the Daily Log Form.
Dates of emergency application in winter	This is documented on the Daily Log Form.
For surface application on frozen or snow-covered ground, whether any applied manure or process wastewater ran off the application site	Inspections are completed and documented and entered to Snap+.

A weather log for all dates that manure and process wastewater is spread, including weather 24 hours prior to, and following application	Yes. This is documented on the Daily Log Form.
Total amount of nitrogen and phosphorus actually applied to each field, including documentation of calculations for the total amount applied	The manure and process wastewater nutrient results are entered into Snap +. This information is used along with the soil tests and crop information to calculate the nitrogen and phosphorus amount applied to each field.
Results from manure, process wastewater, and soil sampling	The labs send copies of the results to S&R Egg Farms, Inc.
Dates of manure application equipment inspection	Yes. This is documented and entered to Snap+.

For each manure, process wastewater, and soil sample the permittee shall record the following information	
The date, exact place, method, and time of sampling or measurements	The time of sampling is not recorded.
The individual or lab that performed the sampling or measurements.	No. It just reads S&R Egg Farm, Inc.
The date the analysis performed.	Yes. the date is on the Analytical Report provided by the laboratory.
The individual who performed the analysis.	Yes. The Analytical Report has the initials of the Analyst.
The analytical techniques or methods used.	Yes. The Analytical Report has the method used for the analysis.
The results of the analysis.	Yes. The Analytical Report has the results which are sent to S&R Egg Farm.

For each inspection conducted by the permittee, the permittee shall record the following information:	
The date and name of persons performing the inspection	The person performing the inspections initials and dates.
An inspection description including components inspected	This is filled out as part of a checklist and is initialed and dated by the inspector.
Details of what was discovered during the inspection	Yes.
Recommendations for repair or maintenance	Yes. This is recorded on the checklist.
Any corrective actions taken.	Yes. This is recorded on the checklist.

Table 9: Land Application Records (details of the records reviewed)

Fields available for application this year:	Yes. This information was provided by WDNR.
Timing limitation on fields:	Yes. This is provided in the Permit and provided in S&R Egg Farm, Inc.'s NMP.
Precipitation Records	This is in the Daily Log Forms.
Annual manure analysis for N and P	Yes. Samples are taken from different manure sources approved in the permit. This information was provided in the Information Request and 2022 data that was provided by WDNR.
Soil tests for fields (for P) less than 5 years old?	Yes. S&R Egg Farm, inc. provided this information as requested in the Information Request and WDNR provided additional 2022 information.
Inspection of land application equipment documentation:	Yes. This was provided as part of the Information Request.
Crop:	Yes. This information was on the Annual Spreading Report that is generated from Snap + and was provided to EPA as part of the Information Request.
Application Rate:	Yes. This information was on the Annual Spreading Report that is generated from Snap + and was provided to EPA as part of the Information Request.
Crop Yield Goals:	Yes. This information was on the Annual Spreading Report that is generated from Snap + and provided to EPA as part of an Information Request.
Timing of land application:	Yes. This information was on the Annual Spreading Report that is generated from Snap + and was provided to EPA as part of the Information Request.
Method of land application:	This is on the Daily Log Form.

Table 10: Facility Records (details of the records reviewed)

Diversion devices:	Yes. This is recorded under the facility's weekly stormwater control inspections.
Impoundments:	No impoundments.
Depth marker observations:	No.
Water Lines:	Yes.

Mortality management practices used by the permittee to meet the requirements of NR 243.13(8), including the dates and methods of disposal:	Yes.
Current design of any manure storage structures, including volume for solids accumulation, design treatment volume,, total design volume and appropriate number of days of storage capacity:	Yes. This was provided as part of the Information Request.
Overflow records:	Not applicable.
Crop Yields:	Yes. This was provided to EPA as part of the Information Request.
Land Application Dates:	Yes. This is first recorded on the Daily Log Form.
Weather Conditions at time of application (24 before-24 after):	Yes. This is recorded on the Daily Log Form.
Test Methods for Manure Testing:	According to Mr. Hill, they follow what is required in their WPDES Permit.
Test Methods for Soil Testing:	According to Mr. Hill, they follow what is required in their WPDES Permit.
Manure Test Results:	Yes. EPA reviewed manure test results provided in the Analytical Report and provided to EPA as part of the Information Request.
Soil Test Results:	Yes. EPA reviewed manure test results provided an Analytical Report as requested in the Information Request.
Calculations of N and P applied:	This is calculated in the Snap + program.
Application Methods:	This was in the NMP.
Application Equipment Inspection Dates:	These documents were provided to EPA as part of the Information Request.
Inspection records each time manure or process wastewater is surface applied on frozen or snow-covered ground to determine if applied materials have run off the application site. Inspections shall occur during and shortly after application.	Yes. EPA received some of the inspection records for process wastewater land applied to frozen ground as part of the Information Request.

Table 11: NPDES Permit

Type of permit (General, individual)	Individual
Is a copy of the permit on site?	EPA did not review records at this site.
Date that the permit was issued:	February 1, 2018
Date that the permit will expire:	December 31, 2022.
Permitted number of animal units:	Permitted as large CAFO under an individual permit.
Does the permit contain a compliance schedule? If yes, provide a detailed description of the requirements and the status.	Yes. Submit Annual Report, January 2023. Submittal of Nutrient Management Plan – Management Plan update #1 March 31, 2023.
Have there been any changes made to the production area since the permit was issued? If yes, provide a detailed description.	Yes, barns have been added to Cold Spring Egg. New Manure Storage Building and Pellet Operation.
Are there any practices in the permit that are not being done at the facility? (Records kept, inspections performed, etc.)	Yes. Since the fire at Cold Spring Egg in 2020, S&R Egg Farm, Inc has had to change the manure storage areas at Cold Spring Egg.

2.2 Walkthrough of the Facility

EPA started the walkthrough of the facility around the new Manure Storage Building on the northeast side of the production area. EPA walked around the building and to the west. EPA observed the open manure composting site and stormwater pond. The manure storage area is a temporary structure until the pellet operation is completed. EPA asked how runoff from this structure is collected and was told that the manure is so dry that precipitation would be absorbed, but if any runoff would leave the structure, it would flow into the stormwater pond that infiltrates into the ground.

EPA continued the walk-through of the facility to the biofilter. The facility does have an air permit for the bio-filter. EPA continued its walk around of the barns 1-12. Between the barns, EPA observed some dust on the barns that had the exhaust fans, but not many feathers. It is set up between the buildings, so that drains are under rocks between the buildings. The tiles drain to a perimeter ditch surrounding Cold Spring Egg. Any water collected within the ditch infiltrates into the ground.

EPA walked around earthen pond located in the corn field. It is not used for any part of the operation but had been in the past. Mr. Hill was not sure the last time it was used for anything but collecting precipitation.

EPA continued the walk-around of the feed grain areas where some feed was observed on the ground. There was a berm around the area. The areas between the building and the feed areas are cleaned up regularly.

At the time of the inspection, EPA did not observe the egg processing building because it was not in operation. Due to the Avian Flu, Cold Spring Egg had just started repopulating the barns and the birds had not started laying eggs.

EPA observed a perimeter ditch and a berm that prevented any runoff from leaving the site. So, EPA did not walk any waterways.

2.3 Closing Conference and Post-Inspection

EPA mentioned that we would need to set up a date to inspect the other two facilities and conduct a records review.

Table 12: Post Walk-Through

Were specific Areas of Concern discussed with facility personnel?	EPA mentioned that the NMP would need to reflect changes made to Cold Spring Egg.
Who were the Areas of Concern discussed with? David Hill and Nina Carns.	
Were any deficiencies or areas of concern addressed or fixed during the inspection? If so, list what was done. No.	
Compliance assistance materials given to facility personnel: No**.**	
Exit Time:	3:30 p.m.
Disposable Boots Left at Facility?	Yes.
Vehicle Washed after leaving facility?	Yes.
Date and Time that vehicle was washed:	9/27/2022 at approximately 4:00 p.m.

Table 14a: Sampling Information

Were samples taken?	No