Message

From: Burdett, Cheryl [burdett.cheryl@epa.gov]
Sent: 4/6/2018 6:40:54 PM
To: Atkinson, Benjamin [atkinson.ben@epa.gov]; Burdett, Cheryl [burdett.cheryl@epa.gov]
Subject: Conversation with Benjamin Atkinson

Burdett, Cheryl 12:08 PM:

Did any of your farms put on their SnapPlus Spreading report for manure source as Generic?

Benjamin Atkinson 12:09 PM:
I've not seen that, but el na did use either book values or other values for manure applied by small farms that they also applied on.

Benjamin Atkinson 12:10 PM:
por que?

Burdett, Cheryl 12:13 PM:
Ahh, was that allowed.

Benjamin Atkinson 12:18 PM:
It seems so. Since the small are not under the CAFO rules, the CAFO simply has to do their best to account of rall nutrients applied to field.

Burdett, Cheryl 12:49 PM:
Would you know if they applied more manure than what was approved under it planned spreading plan is that a violation? Since that was the approved application rate

Benjamin Atkinson 12:51 PM:
unclear. The feeling that I got was that

Benjamin Atkinson 12:51 PM:
One the one had the permit does state that...

Benjamin Atkinson 12:51 PM:
The permitte shall land apply manure and process wastewater in compliance with the departmetn approved nutrient management plan.....

Benjamin Atkinson 12:52 PM:
and that

Benjamin Atkinson 12:52 PM:
The management plan may be amended at any time provided the proposed amendements are approved in writing by the department...

Benjamin Atkinson 12:52 PM:
Changes requiring a plan amendment include, but are not limited to, changes to application rates...

Burdett, Cheryl 12:53 PM:
So they would have to get approval?

Benjamin Atkinson 12:53 PM:
on the other hand if the application is not over application then what are we really complaining about.

Benjamin Atkinson 12:53 PM:
slash

Burdett, Cheryl 12:53 PM:

I don't know yet. It might be a requirement because of the condition of the soil type.

Burdett, Cheryl 12:53 PM:
To have to apply less

Benjamin Atkinson 12:54 PM:
You could argue that that the a2809 application rate is listed in the NMP and should be considered the upper limit of what they could spread.

Burdett, Cheryl 12:55 PM:
Yes correct I could argue that.

Benjamin Atkinson 12:55 PM:
I suspect that technically, yes, it is a violation, but that WDNR wouldn't/doesn't interpret it that way.

Benjamin Atkinson 12:55 PM:
But I don't know that.

Benjamin Atkinson 12:55 PM:
I don't think you would get management to sign off on an order with that being the only violation.

Benjamin Atkinson 12:56 PM:
but again I don't know that.

Burdett, Cheryl 12:56 PM:
Ok. I know that because CSD is in sandy soil they may be required to apply less manure because of it leaching past the root zone into the groundwater.

Benjamin Atkinson 12:56 PM:
is that in the regs?

Burdett, Cheryl 12:57 PM:
I'm not sure yet. I know that following the NMP is part of the regs.

Burdett, Cheryl 1:07 PM:
Do you have access to ArcGis

Benjamin Atkinson 1:10 PM:
I think so

Burdett, Cheryl 1:11 PM:
Could I send you some photos with GPS coordinates that you could put on a map.

Burdett, Cheryl 1:15 PM:
If you are to busy don't worry, I can try and do it Monday. I just cannot seem to get ArcMaps to load.

Benjamin Atkinson 1:19 PM:
I'm trying to load arc now.

Burdett, Cheryl 1:20 PM:
Ok. Good Luck.

Benjamin Atkinson 1:28 PM:
send the photos

Burdett, Cheryl 1:28 PM:
Ok. Great.