CAFO FACILITY INSPECTION REPORT

OFFICE NO: PCA SYSTEM TASK NO:

INSPECTOR(S): Jared Richardson (PG Environmental, LLC) and Anthony D'Angelo (PG Environmental, LLC)

FACILITY INFORMATION

8365986001 WDID NUMBER	**Pat Carrigan** OWNER NAME	**American Beef Packers** FACILITY NAME
CAG018001 NPDES NUMBER	**Ex. 6 Personal Privacy (PP)** OWNER ADDRESS	FACILITY ADDRESS
R8-2007-0001 RWQCB ORDER NO.	**Chino, CA 91710** OWNER CITY AND STATE	**Ontario, CA 91762** FACILITY CITY AND STATE
03-06-2013 SCHEDULED INSPECTION DATE	**Pat Carrigan** OWNER CONTACT	**Sam Sousa** FACILITY CONTACT
03-06-2013 ACTUAL INSPECTION DATE	**Ex. 6 Personal Privacy (PP)** OWNER PHONE NO.	FACILITY PHONE NO.
Unknown RECEIVING WATER	Ex. 6 Personal Privacy (PP) FACILITY LATITUDE	Ex. 6 Personal Privacy (PP) FACILITY LONGITUDE

INSPECTION TYPE

- ☐ (A1) "A" type compliance -- (EPA Type S)
- ☒ (B1) "B" type compliance -- (EPA Type C)
- ☐ (02) Noncompliance follow-up - Correction of a previously identified violation
- ☐ (03) Enforcement follow-up - Enforcement action is being met
- ☐ (04) Complaint - Complaint
- ☐ (05) Pre-requirement
- ☐ (06) Miscellaneous

_____ (Type) NOTE: If this is an EPA inspection not mentioned above, please note type (e.g., biomonitoring, performance audit, diagnostic, etc.)

No	Was the inspection pre-announced?
Yes	Were potential violations noted during this inspection?
No	Was this a quality assurance-based inspection?
No	Were bioassay samples collected?
No	Were water quality samples collected?

INSPECTION SUMMARY

The overall Facility rating, on a 1 (Unreliable) to 5 (Very Reliable) scale, was determined to be: 2 = Marginal.

American Beef Packers (hereinafter, Facility) was rated "Marginal" due to the following items:

- **Depth markers were not installed in the three storage ponds, P1, P2, and P9, located in the southern portion of the Facility (refer to Photos 2, 4, and 10).**
- **Evidence of previous mortality disposal (skeletal remains) was observed inside P2 (refer to Photos 8 and 9)**
- **Annual Reports for the previous five (5) years were not retained or available for review at the time of the inspection**
- **Weekly (and daily) Storm Water Management Structure visual inspections were not conducted at the Facility**
- **Manure Tracking Manifests were not retained onsite or available for review at the time of the inspection**
- **The Engineered Waste Management Plan (EWMP) was not retained on-site or available for review at the time of the inspection**
- **The EWMP was not fully implemented onsite at the Facility (refer to Photos 2 through 7)**

- **The containment ponds are not cleaned annually as required by the EWMP**
- **Manure stockpiles located in the southern portion of the Facility had not been removed from the Facility within 180 days (refer to Photos 18 and19)**
- **Secondary containment was not provided for a 55-gallon drum of used petroleum product on the south side of the Facility, northwest of P2 (refer to Photos 20, 21, and 22). A bung cap was missing from the 55-gallon drum (refer to Photo 22)**
- **Accumulated manure solids and trash/debris was present in P1 and P2 (refer to Photos 2 through 7)**
- **The concrete spillway on the east side of P2 was observed deteriorated and undercut (refer to Photos 15 and 16)**

INSPECTOR DATA

INITIALS __JCR/AJD___ SIGNATURE _____ DATE__03/06/2013____

CIWQS DATA ENTRY DATE: _____ REGIONAL BOARD FILE NUMBER: _____

FOR INTERNAL USE: REVIEWED BY: (1)_____ (2) _____ (3) _____

REPORT PREPARED BY: Anthony D'Angelo (PG Environmental, LLC) ON 03/14/2013

EPA SUGGESTED INSPECTION CHECKLIST

☒ Permit	☐ Flow Measurement	☐ Pretreatment	☒ Operations & Maintenance
☒ Records/Reports	☐ Laboratories	☐ Compliance Schedules	☐ Sludge Disposal
☒ Facility Site Review	☐ Eff/Receiving Waters	☐ Self- Monitoring	☐ Other

POTENTIAL VIOLATIONS

1. Depth markers were not installed in the three storage ponds, P1, P2, and P9, located in the southern and south-western portion of the Facility as required by Permit Attachment B - Monitoring and Reporting Program, Section I.B.1 (refer to Photos 2, 4, and 10). This is a recurring issue identified in a previous inspection conducted on September 24, 2008.

Description of Potential Violation: **Refer to Item No. 1 of the 'Inspection Observations' section of this report for additional details.**

2. Evidence of previous mortality disposal (skeletal remains) was observed on the southern embankment of P2 located in the southern portion of the Facility (refer to Photos 8 and 9). Discharge Prohibition IV.F states that "the disposal of any mortality in any process wastewater system is prohibited."

Description of Potential Violation: **Refer to Item No. 2 of the 'Inspection Observations' section of this report for additional details.**

3. Weekly Storm Water Management Structure visual inspections are not conducted at the Facility as required by Permit Attachment B - Monitoring and Reporting Program, Section I.B.

Description of Potential Violation: **Refer to Item No. 1 of the 'Annual Report Review' section of this report for additional details.**

4. The EWMP was not retained onsite or available for review at the time of the inspection as required by Provision VII.C.3.c of the Permit.

Description of Potential Violation: **Refer to Item No. 1 of the 'Engineered Waste Management Plan Review' section of this report for additional details.**

5. The EWMP was not fully implemented onsite and the containment structures were not adequately maintained at the Facility, as required by Provisions VII.C.3.a-b of the Permit (refer to Photos 2 through 7).

Description of Potential Violation: **Refer to Item Nos. 2, 3, and 4 of the 'Engineered Waste Management Plan Review', section of this report for additional details.**

6. Manure stockpiles located in the southern portion of the Facility had not been removed from the Facility within 180 days as required by Provision VII.C.5.e of the Permit (refer to Photos 18 and 19).

Description of Potential Violation: **Refer to Item No. 1 of the 'Facility Housekeeping, Wastewater, and Manure Information' section of this report for additional details.**

7. Accumulated manure solids and trash/debris were observed in P1 and P2 in the southern portion of the Facility (refer to Photos 2 through 7). The Discharger must design and maintain all containment structures per the EWMP as required by Provision VII.C.3.a of the Permit.

Description of Potential Violation: **Refer to Item No. 3 of the 'Facility Housekeeping, Wastewater, and Manure Information' section of this report for additional details.**

8. The concrete spillway on the east side of P2 was observed deteriorated and undercut (refer to Photos 15 and 16). The Discharger must design and maintain all containment structures per the EWMP as required by Provision VII.C.3.a of the Permit.

Description of Potential Violation: **Refer to Item No. 4 of the 'Facility Housekeeping, Wastewater, and Manure Information' section of this report for additional details.**

Date of Potential Violation: **N/A**

Date of Potential Violation Determination: **March 6, 2013**

INSPECTION OBSERVATIONS

On March 6, 2013, a Concentrated Animal Feeding Operation (CAFO) inspection was conducted for Santa Ana Water Board Order No. R8-2007-0001 - 'General Waste Discharge Requirements for Concentrated Animal Feeding Operations (Dairies and Related Facilities) within the Santa Ana Region', NPDES General Permit No. (CAG018001) at American Beef Packers in Ontario, California (refer to Photo 1). The inspectors met with Mr. Sam Sousa (Manager, American Beef Packers) at approximately 9:00 AM on March 6, 2013. Mr. Sousa did not participate in the Facility site visit. Records were not available for review at the time of the inspection. Mr. Sousa informed the inspectors that all records are maintained at the American Beef Packers packing house in Chino, CA. The inspectors held a closing conference with Mr. Sousa at the conclusion of the inspection. During the closing conference, the inspectors reviewed the preliminary inspection findings with the Facility representative.

The Facility is a 75-acre parcel divided between two active dairy operations: American Beef Packers (north) and P&D Dairy (south), owned by San Bernardino County. P&D Dairy was not inspected as a component of this inspection. American Beef Packers is a beef cattle ranch with an animal population of approximately 1,200 beef cattle at the time of the inspection. Milking and cow washing activities do not occur at the Facility; therefore, process wastewater is not generated at the Facility. Surface runoff from all corrals naturally flows south into P1 and P2 in the southern portion of the Facility (refer to Photos 11, 12, and 13). P1, P2, and P9 were dry at the time of the inspection. A pump station and floating pumps were present at P1 (refer to Photos 5, 6, and 14); however, Mr. Sousa stated that they were not operational. Depth markers were not present in P1, P2, and P9 (refer to Photos 2, 4, and 10). It should be noted that the EWMP identifies a fourth pond at American Beef Packers, P10, in the northeastern portion of the Facility; however, this appeared to be a pasture at the time of the inspection. P2 in the southeastern portion of the Facility was equipped with a concrete spillway on the eastern embankment slope of the pond; however, erosion, deterioation, and undercutting of the spillway was observed (refer to Photos 15 and 16). A concrete spillway was also observed on the southern embankment of P1 (refer to Photo 17). Mr. Sousa stated that he had not cleaned the ponds within the approximate three (3) years of operation at the Facility. Mr. Sousa also stated that the previous tenant of the Facility did not clean the existiing ponds prior to leaving the Facility, and that due to a lease agreement with San Bernardino County (Owner/Discharger), he is not responsible for cleaning the ponds. A large amount of accumulated manure solids was observed in P1 and P2 at the time of the inspection (refer to Photos 2 through 7).

Mr. Sousa stated that the corrals are cleaned of solids two (2) times per year and manure is typically hauled away immediately from the Facility following the cleaning event. In addition, the corral alleys are scraped weekly. The last manure hauling event at the Facility was in October 2012. A small manure stockpile was observed onsite at the time of the inspection in the southern portion of the Facility, adjacent to P2; however, Mr. Sousa stated that the stockpile was left over from the previous tenant. Manure is hauled offsite by Franco Transport to Marquez composting or an unknown farm cropland; however Mr. Sousa did not know the exact location of the cropland manure disposal site. Manure tracking manifests were not maintained onsite. All mortalities are removed from the Facility immediately by Stiles Animal Removal, Inc.

FACILITY

CAFO Size: **Large** (at time of inspection) | Total Acres: **Approx. 38** | Production Area Acres: **Unknown**

CONTAINMENT STRUCTURES

Wastewater Lagoons: **3** | Evaporation Ponds: **0** | Catch Basins: **0**

Depth Markers: **0** | Other: **1 pasture**

ANIMALS ONSITE DURING INSPECTION

Milk Cows: **0** | Dry Cows: **0** | Heifers: **0**

Calves: **0** | Other: **Approx. 1,200 beef cattle**

INSPECTION OBSERVATIONS

1. The inspectors observed, during the inspection, that depth markers were not installed in the three existing storage ponds, P1, P2, and P9, located in the southern and south-western portion of the Facility as required by Permit Attachment B - Monitoring and Reporting Program, Section I.B.1 (refer to Photos 2, 4, and 10). In addition, accumulated manure solids was observed inside P1 and P2; however, the inspectors could not determine the depth of the solids within each containment structure due to the lack of depth markers. This is a recurring issue identified in a previous inspection conducted on September 24, 2008.

2. The inspectors observed, during the inspection, evidence of previous mortality disposal (skeletal remains) on the southern embankment of P2 located in the southern portion of the Facility (refer to Photos 8 and 9). Mr. Sousa stated that all mortalities at the Facility are hauled away immediately by Stiles Animal Removal, Inc.; however, this had not been adequately implemented at the Facility. In addition, Mr. Sousa explained that he had not cleaned the ponds since he took operational control over the Facility approximately three (3) years prior to the inspection. Discharge Prohibition IV.F states that "the disposal of any mortality in any process wastewater system is prohibited."

ANNUAL REPORT REVIEW

ANNUAL REPORT

Monitoring Year: **N/A** Reviewed: **No** Signed & Certified: **Unknown**

Submittal Date: **N/A**

REPORTED ANIMAL POPULATION

Milk Cows: **N/A** Dry Cows: **N/A** Heifers: **N/A**

Calves: **N/A** Other: **N/A**

MANURE INFORMATION

Amount of manure spread on cropland at the Facility: **N/A**

Amount of manure hauled away from the Facility: **Unknown**

Name and location of the composting operation, or, if the manure was hauled to cropland, the owner or tenant, and the destination address: **Marquez composting and unknown croplands**

1. Weekly Storm Water Management Structure visual inspections are not conducted at the Facility as required by the Permit and as stated by Mr. Sousa. "All containment structures, including but not limited to, ponds, berms, and wastewater distribution lines, shall be inspected at least once a week during the entire year and at least once each 24-hour period during a storm event in which rainfall exceeds 0.5 inches in 24 hours. The findings of these inspections shall be documented on the attached CAFO Weekly Storm Water Management Structure Inspections Log Sheet (Attachment 1[of the Permit])," as required by Permit Attachment B - Monitoring and Reporting Program, Section I.B. In addition, Section V - 'Operation and Maintenance', Item G - 'Inspection and Maintenance' of the approved EWMP states that "inspections of all berms, basins, pond appurtenances, and pond depths shall be made by the Dairy Operator on a weekly basis….A log book shall be kept by the Dairy Operator with the results of each inspection and any necessary follow-up remedial actions taken, and such information shall be submitted to the proper agencies within required or requested;" however, this had not been implemented at the Facility.

2. Annual Reports for the previous five (5) years were not available for review at the time of inspection. Mr. Sousa stated that all records are maintained at the American Beef Packers packing house in Chino, CA. All monitoring

data shall be maintained for at least five (5) years and shall be made available upon request as required by Permit Attachment B - Monitoring and Reporting Program, Section I.A.

ENGINEERED WASTE MANAGEMENT PLAN (EWMP) REVIEW

Did the inspector review the EWMP in the RWQCB file?	**Yes**
Did the Facility have a copy of the EWMP on-site and available for review?	**No**
EWMP preparation date:	**June 13, 2005**
EWMP prepared by:	**Associated Engineers**
Santa Ana RWQCB EWMP acceptance date:	**June 20, 2005**
EWMP was certified by the Facility's engineer/consultant on:	**Unknown**

1. The EWMP was not retained onsite or available for review at the time of the inspection as required by Provision VII.C.3.c of the Permit. Mr. Sousa stated that all records, including the EWMP, are maintained at the American Beef Packers packing house in Chino, CA. A copy of the EWMP in the RWQCB file was reviewed by the inspectors prior to the inspection. At the time of the EWMP preparation date, the maximum animal population capacity at the Facility was 1,480 animal units; however, that number is the combined total for both operations (American Beef Packers and P&D Dairy) onsite. The EWMP was orginially designed for one dairy to be operating at the Facility. At the time of the inspection the animal population at American Beef Packers was approximately 1,200 beef cattle.

2. The EWMP was not fully implemented onsite at the Facility as required by the Permit. Section V - 'Operation and Maintenance', Item G - 'Inspection and Maintenance' of the EWMP states that "inspections of all berms, basins, pond appurtenances, and pond depths shall be made by the Dairy Operator on a weekly basis. These inspections shall be made daily during the wet season after the beginning of the significant rainfall. An inspection shall also be made following any rainfall at any time which causes runoff. A log book shall be kept by the Dairy Operator with the results of each inspection and any necessary follow-up remedial actions taken, and such information shall be submitted to the proper agencies withn required or requested." Mr. Sousa stated that weekly storm water management structure visual inspections are not conducted at the Facility. Permit Attachment B - Monitoring and Reporting Program, Section I.B requires "All containment structures, including but not limited to, ponds, berms, and wastewater distribution lines, shall be inspected at least once a week during the entire year and at least once each 24-hour period during a storm event in which rainfall exceeds 0.5 incehs in 24 hours. The findings of these inspections shall be documented on the attached CAFO Weekly Storm Water Management Structure Inspections Log Sheet (Attachment 1[of the Permit])." As a result, the Discharger was not fully implementing the approved EWMP. The Discharger shall fully implement the EWMP as required by Provision VII.C.3.b of the Permit, and shall conduct weekly inspections in accordance with Permit Attachment B - Monitoring and Reporting Program, Section I.B.

3. The EWMP was not fully implemented onsite and the containment structures were not adequately maintained at the Facility as required by the Permit. Section V - 'Operation and Maintenance', Item E - 'Solids Removal' states "as soon as practicable following the ending of the wet season, solids shall be removed from the containment basins to restore the minimum required available capacity of the basins prior to the next wet season." Accumulated manure solids and trash/debris was observed in P1 and P2 (refer to Photos 2 through 7). Mr. Sousa stated that per the Facility lease agreement with San Bernardino County (Owner/Discharger), he is not required to clean the ponds of any solids that accumulate in the bottom and that the ponds had not been cleaned of manure solids since American Beef Packers began operating at the Facility approximately three (3) years prior to the inspection. As a result, the Discharger had not adequately maintained the containment structures and was not fully implementing the approved EWMP. Provision VII.C.3.a of the Permit states that "the discharger shall design, construct, and maintain containment structures to retain all wastewater within the facility, including all process wastewater and all precipitation on, and drainage through, manure areas resulting from rainfall up to and including a 25-year, 24-hour rainfall event." Provision VII.C.3.b of the Permit states that "the discharger shall develop and fully implement an Engineered Waste Management Plan (EWMP) acceptable to the Executive

Officer." The Discharger shall design, construct, and maintain containment structures and fully implement the EWMP as required by Provisions VII.C.3.a and VII.C.3.b of the Permit.

4. The EWMP was not fully implemented onsite at the Facility as required by the Permit. Section V - 'Operation and Maintenance', Item A - 'Preparation for Winter' states "the ponds and disposal areas shall be plowed and upturned to a depth of 18 inches to maintain maximum infiltration into the ground. This procedure should be performed once at the end of the wet season and once prior to the beginning of the wet season, or twice per year at a minimum." Mr. Sousa stated that per the Facility lease agreement with San Bernardino County (Owner/Discharger), he is not required to maintain the existing ponds in the southern portion of the Facility. As a result, the Discharger was not fully implementing the approved EWMP. The Discharger shall fully implement the EWMP as required by Provision VII.C.3.b of the Permit.

NUTRIENT MANAGEMENT PLAN (NMP) REVIEW (IF APPLICABLE)

Did the Facility have a copy of the NMP on-site and available for review?	**N/A**
Date NMP was prepared:	**N/A**
NMP prepared by:	**N/A**
Santa Ana RWQCB NMP acceptance date:	**N/A**

1. The Discharger does not apply manure, litter, or process wastewater to croplands under their ownership or operational control; therefore, the Discharger is not required to develop, implement, and retain onsite a Nutrient Management Plan as stated in Provision VII.C.3.d of the Permit.

FACILITY HOUSEKEEPING, WASTEWATER, AND MANURE INFORMATION

Typical Depth of Manure in Corrals (in inches):	**8-30**
Estimated Freeboard in Fullest Lagoon (in feet):	**Dry - but capacity was diminished due to accumulated manure solids (refer to Photos 2 and 4)**
Date of Last Lagoon Solids Removal, per Facility Representative:	**Never cleaned**
Disposal Location for Lagoon Solids:	**N/A**

REVIEW OF FACILITY HOUSEKEEPING

1. The inspectors observed, during the inspection, a manure stockpile with vegetation growth located in the southern portion of the Facility, northeast of P2 (refer to Photos 18 and 19). Mr. Sousa stated that the manure stockpile was leftover from the previous tenant and most likely had been stored at that location for multiple years. As a result, the manure stockpile had not been removed from the Facility within 180 days as required by Provision VII.C.5.e of the Permit.

2. The inspectors observed, during the inspection, that secondary containment was not provided for a 55-gallon drum of used petroleum product in the southern portion of the Facility, in between P1 and P2 to the north (refer to Photos 20). Petroleum staining was observed on the sides of the drum and on the ground surface underneath. In addition, a bung cap was not in place for the drum (refer to Photos 21 and 22). Provisions VII.C.5.h of the Permit states that "chemicals and other contaminants handled onsite shall not be disposed of in any manure, littler, process wastewater, or storm water storage or treatment systems." The inspectors did not observe a disposal of chemical into any of the areas outlined above; however, the lack of secondary containment and visible staining on the ground surface creates a potential for petroleum to be spilled and/or released into the adjacent existing ponds.

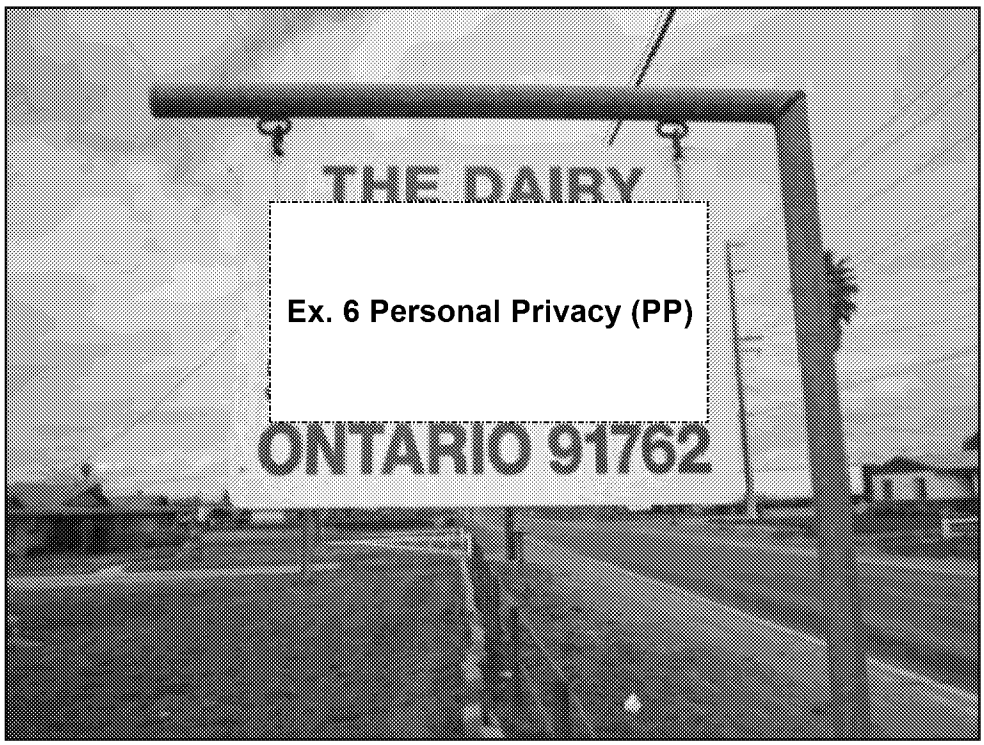
CONDITION OF BERMS AND CONTAINMENT STRUCTURES

3. The inspectors observed, during the inspection, accumulated manure solids and trash/debris in containment structures P1 and P2 in the southern portion of the Facility (refer to Photos 2 through 7). Mr. Sousa stated that per the Facility lease agreement with San Bernardino County (Owner/Discharger), he is not required to clean the ponds of any solids that accumulate in the bottom and that the ponds had not been cleaned of manure solids since American Beef Packers began operating at the Facility approximately three (3) years prior to the inspection. P1 and P2 did not contain depth markers; therefore, the inspectors were unable to determine the depth of accumulated manure solids in the ponds; however, an out of service floating pump was observed partially buried by the manure solids (refer to Photos 5 and 6). Section V - 'Operation and Maintenance', Item E - 'Solids Removal' states "as soon as practicable following the ending of the wet season, solids shall be removed from the containment basins to restore the minimum required available capacity of the basins prior to the next wet season." The Discharger must design and maintain all containment structures per the EWMP as required by Provision VII.C.3.a of the Permit.

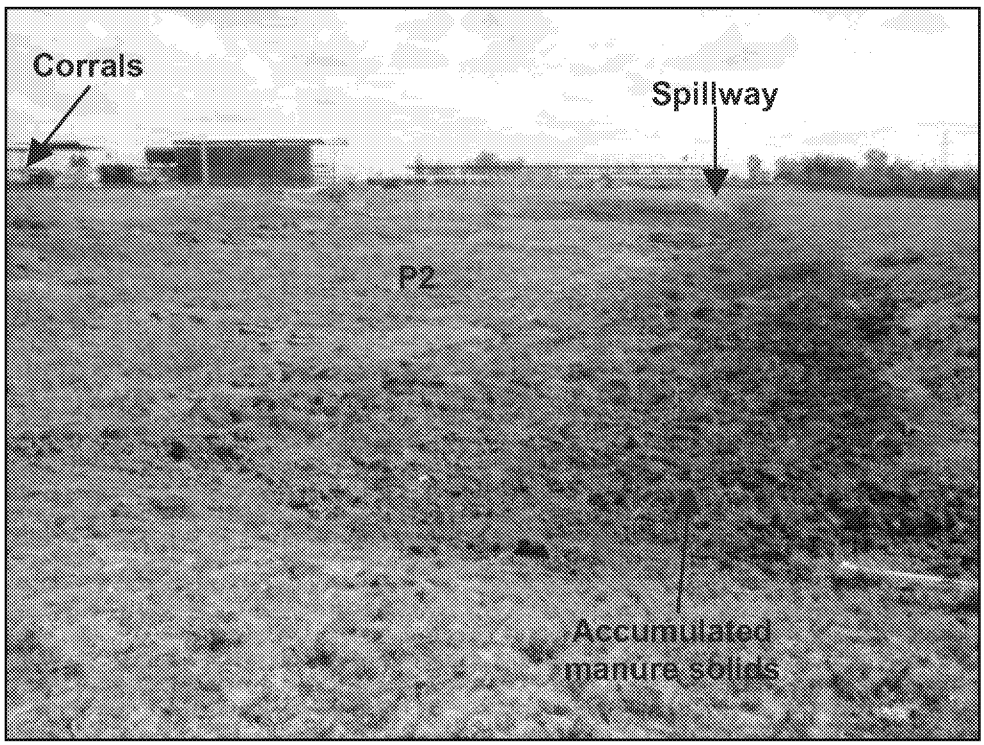
4. The inspectors observed, during the inspection, that the concrete spillway on the eastern side of P2 had become deteriorated and undercut, compromising the spillway's flow pathway (refer to Photos 15 and 16). Mr. Sousa stated that per the Facility lease agreement with San Bernardino County, he is not required to maintain the existing ponds in the southern portion of the Facility. As a result, the Discharger was not adequately maintaining all containment structures at the Facility. The Discharger must design and maintain all containment structures to retain all process wastewater and precipitation from a 25-year, 24-hour rainfall event at the Facility, as required by Provision VII.C.3.a of the Permit.

ITEMS FOR FOLLOW UP ON FUTURE INSPECTIONS

1. The EWMP is retained onsite
2. The EWMP is reflective of current Facility conditions
3. Weekly and daily inspections are being conducted and documented
4. Manure Tracking Manifests are documented and retained
5. Facility containment structures and berms are designed and maintained in accordance with the EWMP and Permit
6. Depth markers are present in the containment structures

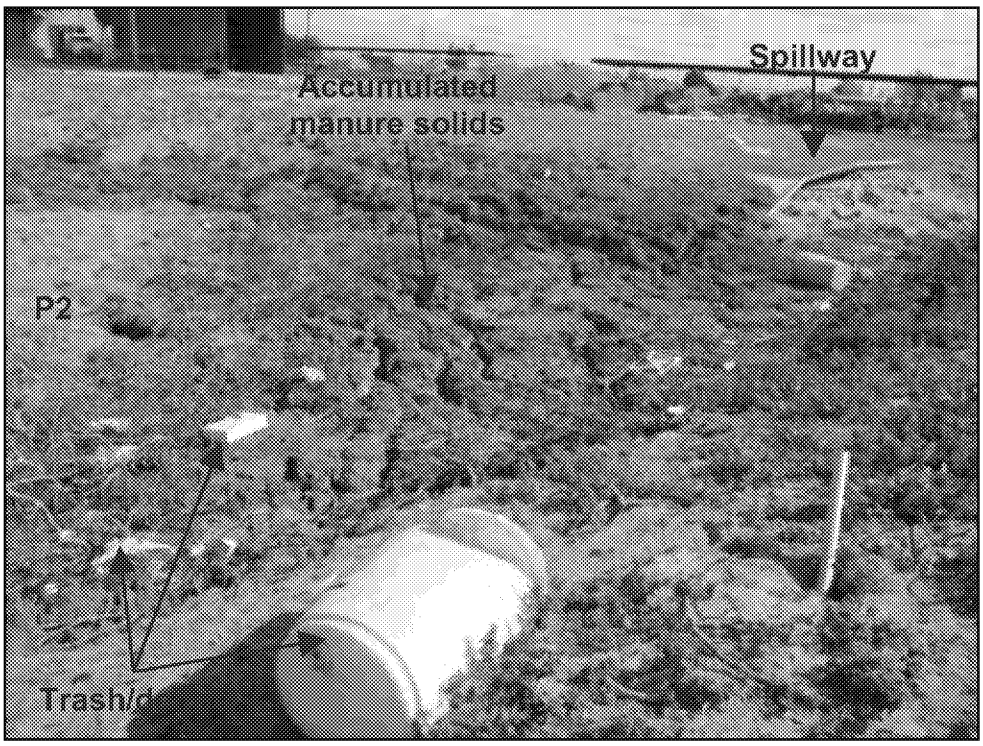


Photograph 1. American Beef Packers Facility address sign.

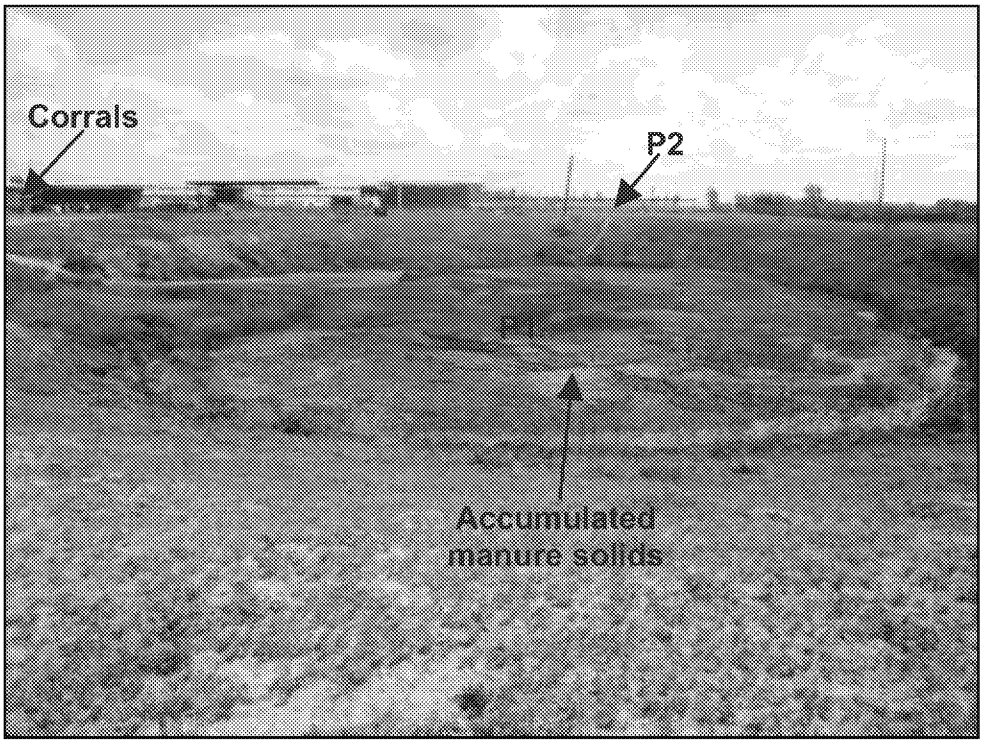


Photograph 2. View facing east of P2 in the southeast portion of the Facility. The pond did not contain a depth marker. Note the accumulated manure solids in the pond.

Inspection and Photograph Date: March 6, 2013

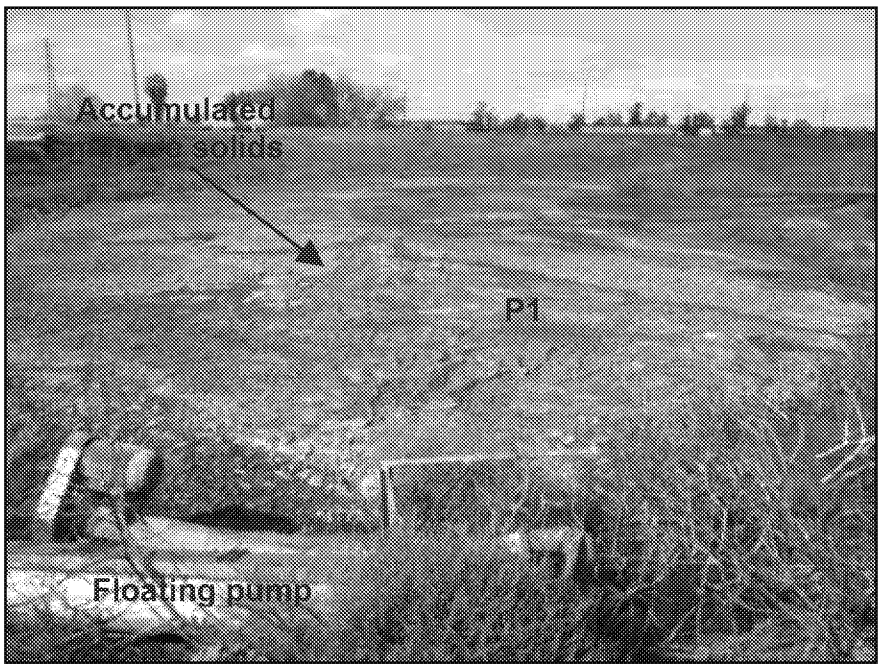


Photograph 3. View facing northeast of P2. Note the accumulated manure solids and trash/debris in the pond.

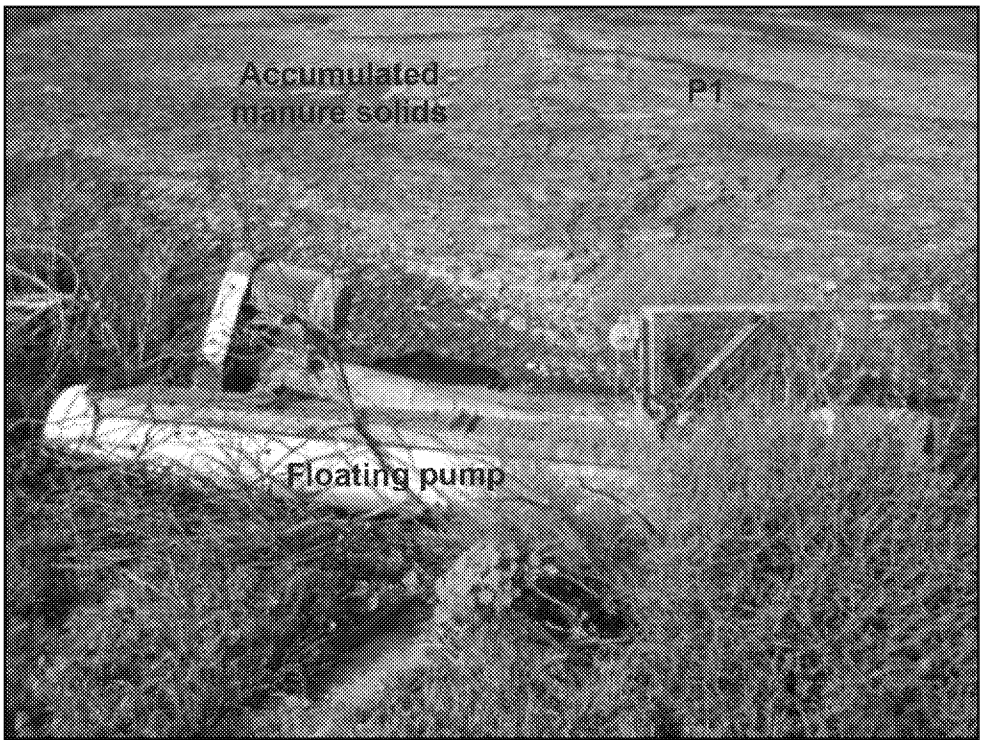


Photograph 4. View facing east of P1. Note the accumulated manure solids and lack of depth marker in the pond.

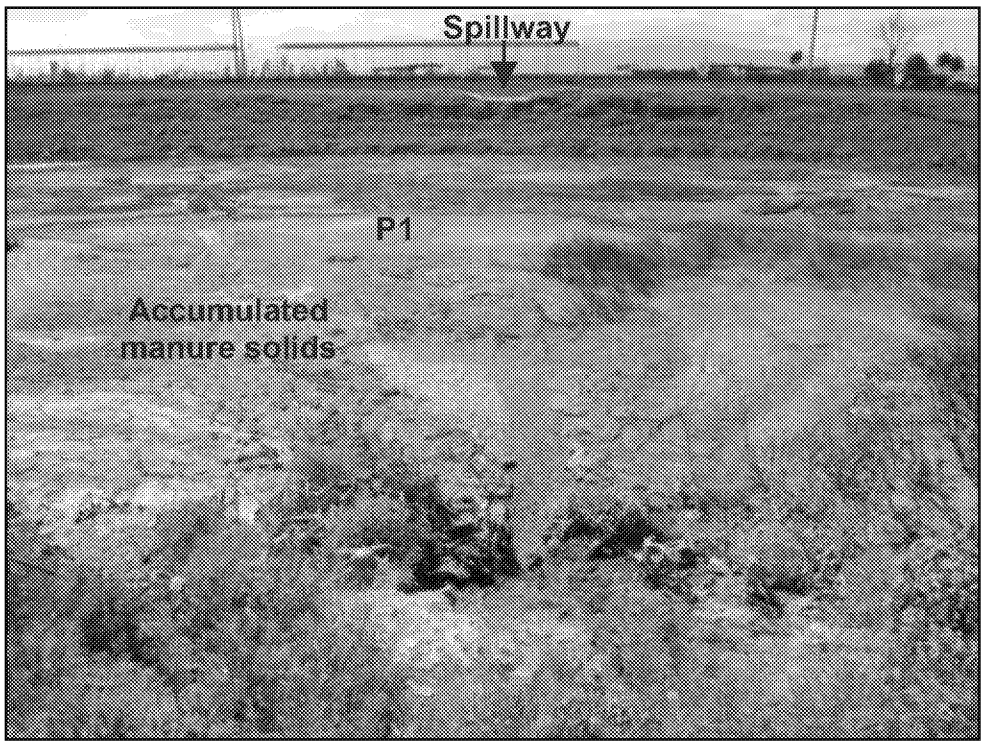
Inspection and Photograph Date: March 6, 2013



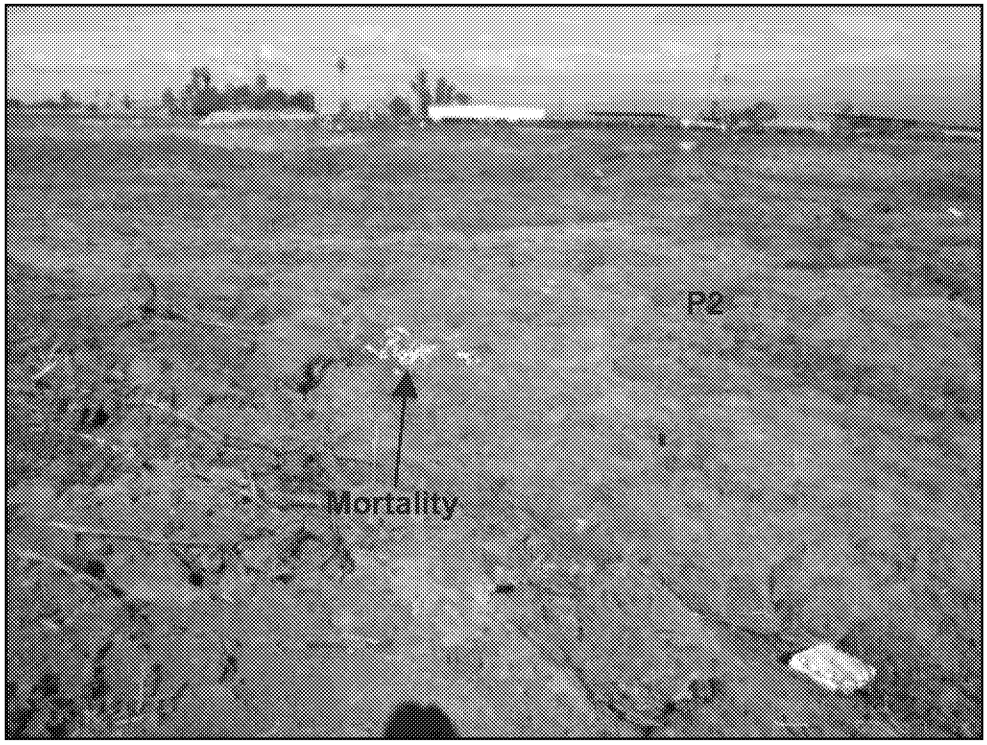
Photograph 5. View facing west of P2. Note the accumulated manure solids in the pond.



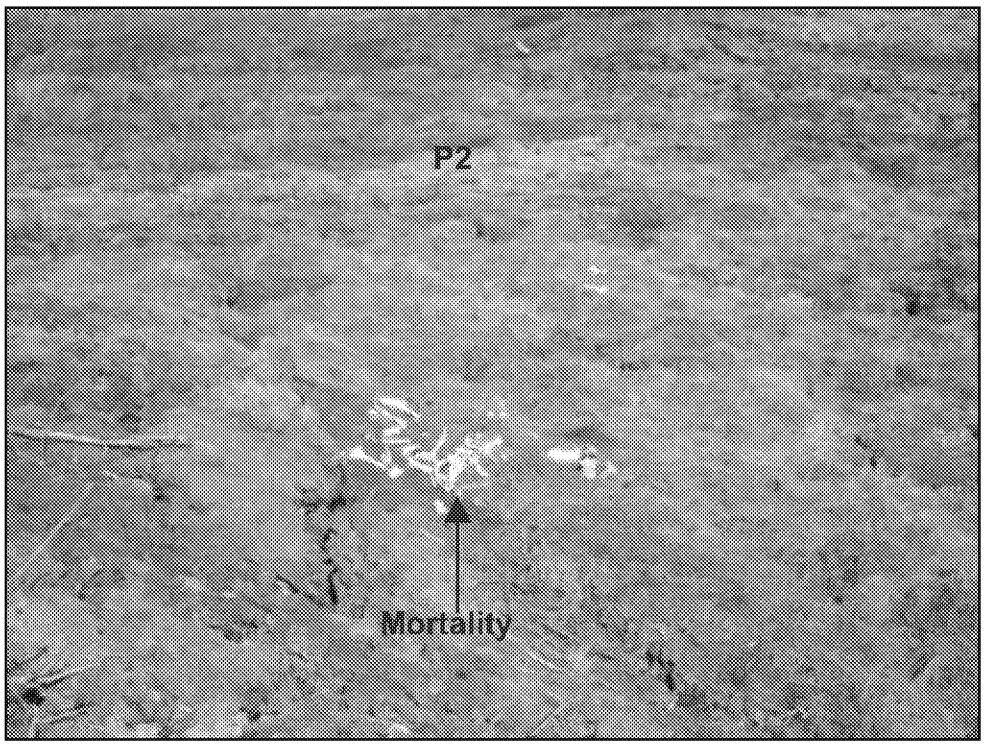
Photograph 6. Additional view of P1. Note the out of service floating pump partially buried in the accumulated manure solids.



Photograph 7. View facing south of P1. Note the accumulated manure solids in the pond.



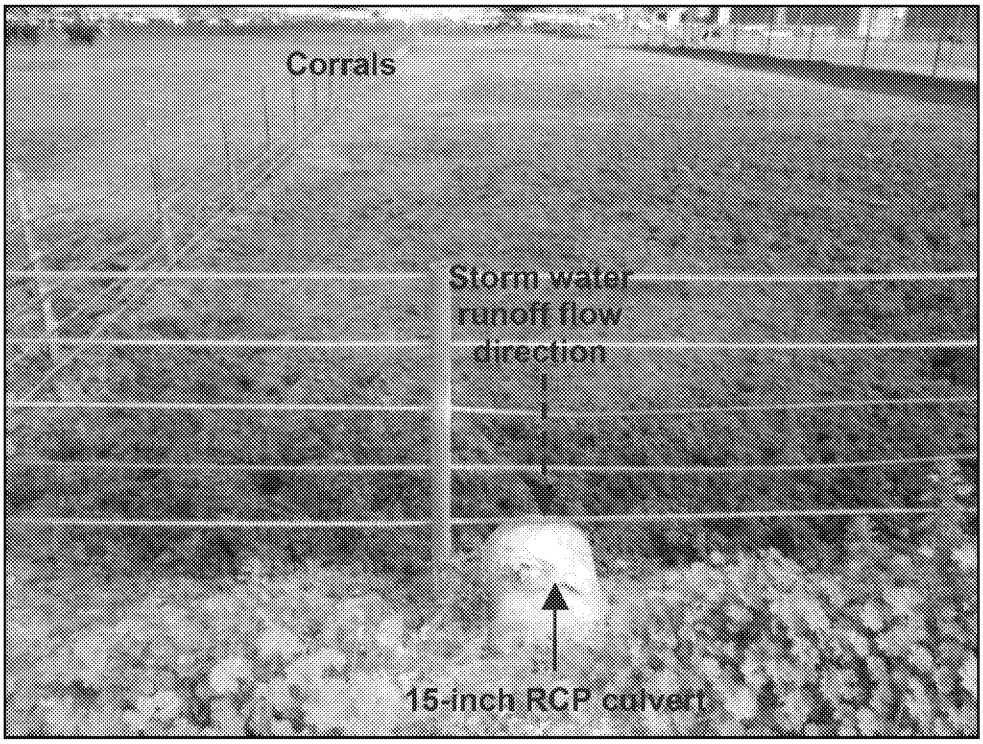
Photograph 8. View facing northwest of P2. Note the evidence of a previous mortality disposal (skeletal remains) on the south side of P2.



Photograph 9. Additional view of evidence of a previous mortality disposal in P2 shown in Photograph 8.

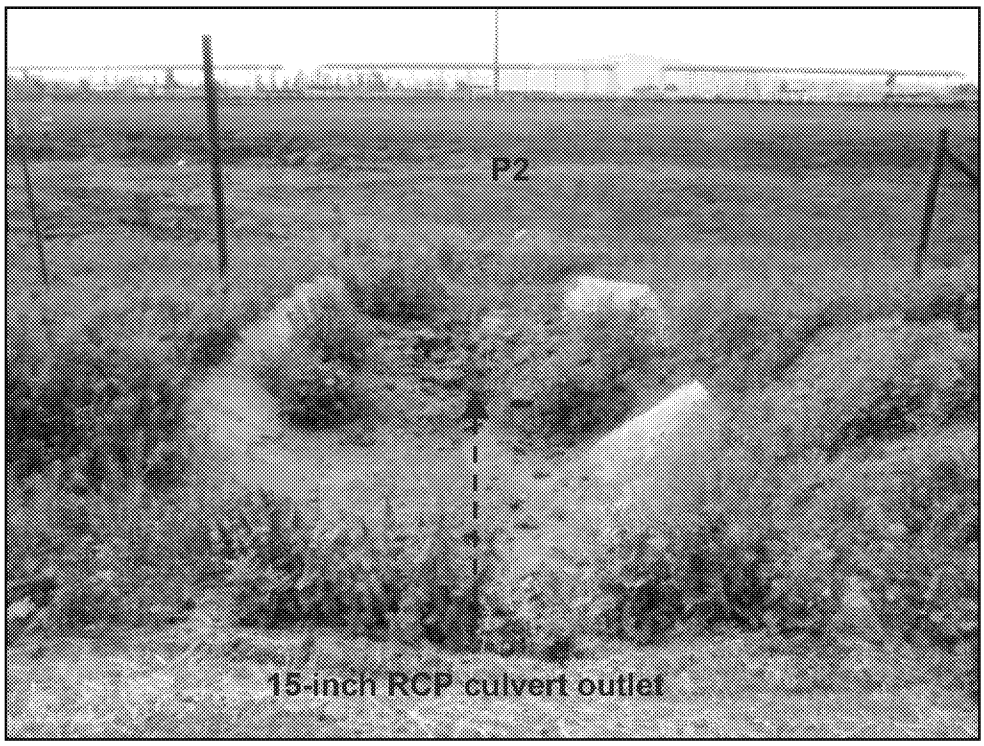
Photograph 10. View facing northwest of P9. Note the pond did not contain a depth marker.

Photograph 11. View facing east of the 15-inch Reinforced Concrete Pipe (RCP) culvert which conveys storm water runoff from the corrals into P2.



Photograph 12. View facing north of the 15-inch RCP shown in Photograph 11. Note this culvert conveys storm water runoff from the corrals into P2.

Inspection and Photograph Date: March 6, 2013

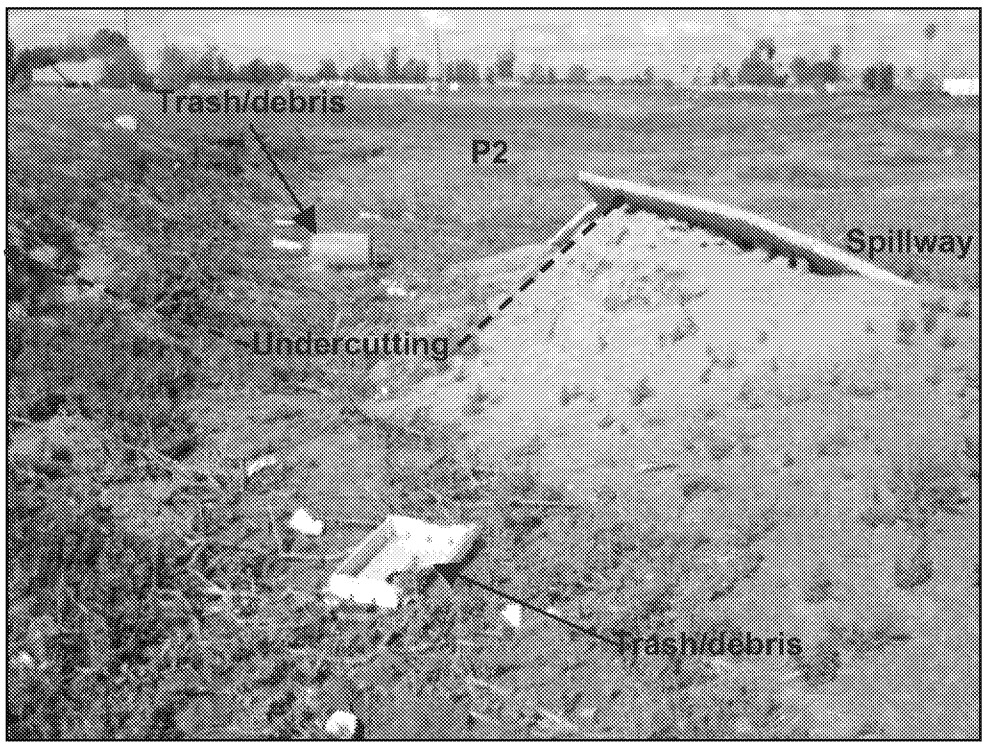


Photograph 13. View facing south of the 15-inch RCP culvert outlet into P2. Note this culvert conveys storm water runoff from the corrals into P2.

Photograph 14. Close-up view of the pump station adjacent to P1 and P2. The Facility representative stated that this pump station was not operational.

Inspection and Photograph Date: March 6, 2013

Photograph 15. View facing west of the concrete spillway on the east side of P2. Note the spillway was deteriorated and previous evidence of undercutting was observed.



Photograph 16. View facing west of the concrete spillway on the east side of P2. Note the spillway was deteriorated and previous evidence of undercutting was observed. Note the accumulated trash/debris within the pond.

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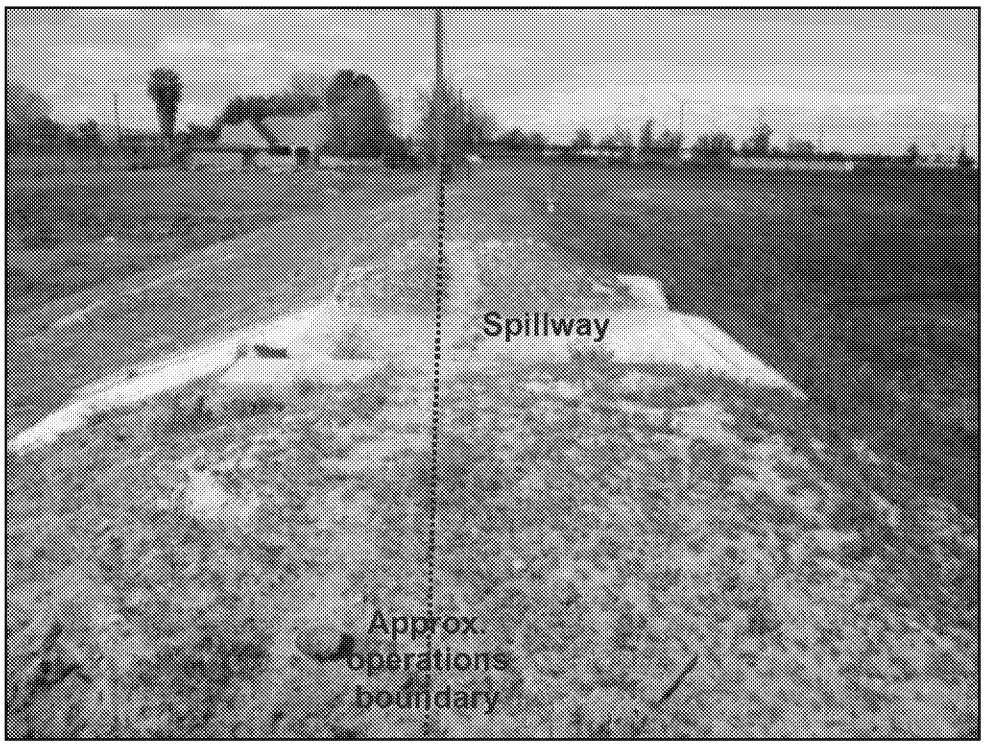
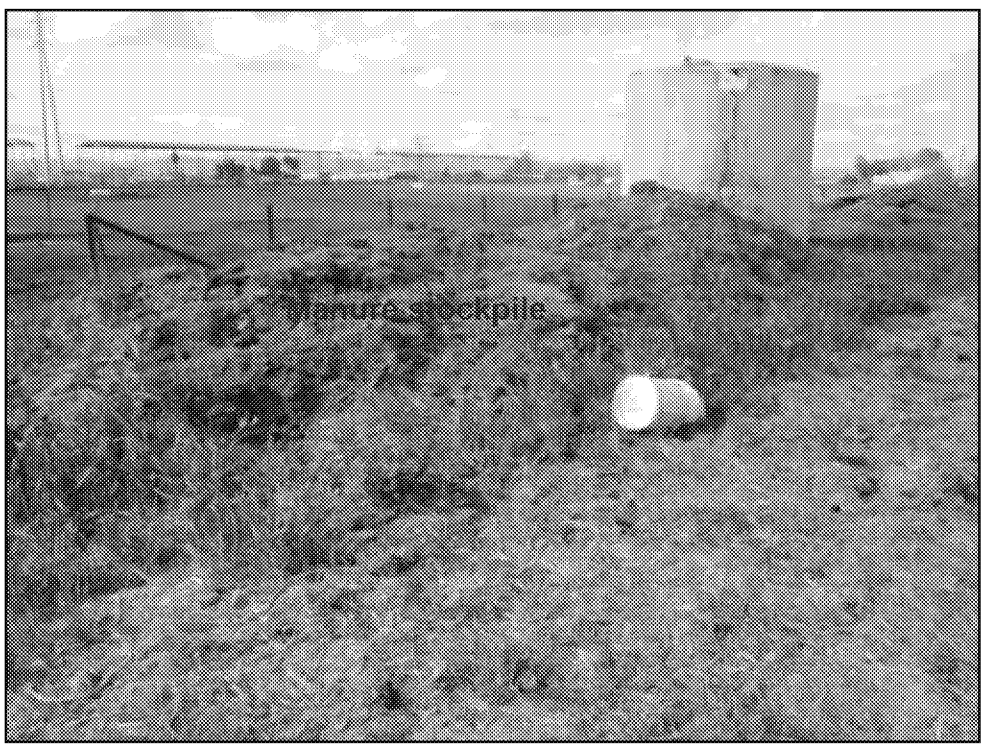


Photograph 17. View facing west of the concrete spillway on the south side of P1.



Photograph 18. View facing southwest of an old manure stockpile located in the south-eastern portion of the Facility.

Photograph 19. Close-up view of the manure contents in the manure stockpile shown in Photograph 18.

Photograph 20. View facing southwest of a 55-gallon drum of used petroleum product located north of P1 and P2. Note the drum did not have adequate secondary containment or a bung cap.

Photograph 21. View facing south of a 55-gallon drum of used petroleum product located north of P1 and P2, shown in Photograph 20. Note the staining on the sides of the drum and on the ground underneath.

Photograph 22. Close-up view of the missing bung cap in the 55-gallon drum of used petroleum product shown in Photographs 20 and 21.

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