EPA United States Environmental Protection Agency

Region 9 Enforcement Division
75 Hawthorne Street
San Francisco, CA 94105

Inspection Date(s):	9/29/2015		
Time:	**Entry:** 9:00 am	**Exit:** 10:00am	
Media:	Water		
Regulatory Program(s)	Clean Water Act NPDES /CAFO Dairy		
Company Name:	Bosch Dairy No. 2		
Facility or Site Name:			
Facility/Site Physical Location:	Ex. 6 Personal Privacy (PP)		
Geographic Coordinates:			
Mailing address:			
Facility/Site Contact:	Bernard Bosch	**Title**: Operator	
	Phone: Ex. 6 Personal Privacy (PP)	**Email**:	
Facility/Site Identifier:	NPDES CAG018001 / Order R8-2013-0001, General waste discharge requirements for CAFOs (dairies and related facilities)		
NAICS:	112120 Dairy Cattle and Milk Production		
SIC:	0241 Dairy Farms		
Facility/Site Personnel Participating in Inspection:			
Name	Affiliation	Title	Email
Bernard Bosch		Operator	
EPA Inspector(s):			
John Tinger	EPA	Engineer	Tinger.John@EPA.gov
Federal/State/Tribal/Local Representatives:			
Edward Kashak	WRCB-R8	Engineering Geologist	ekashak@waterboards.ca.gov
Jawed Shami	WRCB-R8	Engineer	jshmi@waterboards.ca.gov
Inspection Report Author:	John Tinger		415 972-3518
			Date:
Supervisor Review:			
	Ken Greenberg		415-972-3577
			Date:

SECTION I – INTRODUCTION

I.1 Purpose of the Inspection

The purpose of the inspection was to ensure compliance with the NPDES permit and applicable Federal regulations covering the discharge of wastewaters into waters of the United States.

Inspections were conducted jointly with the Regional Water Quality Control Board.

The facility has applied for coverage under NPDES CAG018001 / Order R8-2013-0001, General waste discharge requirements for CAFOs (dairies and related facilities) within the Santa Ana Region.

SECTION II – FACILITY / SITE DESCRIPTION

II.1 Facility Description

According to the EWMP, Bosch Dairy No. 2 is a 20 acre facility. Approximately 8.6 acres are corrals and 8.7 acres are disposal areas. The storage pond is 2 acres at 6 feet depth to provide 12 acre-ft of storage.

Stormwater generally flows in a southerly direction (see photo 1). Stormwater from the central/eastern portion of the facility first flows to the pond located in the center of the facility, and then may sheet flow to the disposal area and then to the pond in the south eastern portion of the facility.

Process area wastewater flows directly to the disposal area on the eastern portion of the facility, consisting of internal dikes flowing southward.

II.2 Compliance History

EPA issued Findings of Violation and Order for Compliance (CWA-309(a)-11-020) on September 22, 2011 based on compliance inspection conducted February 17, 2011. The inspectors' observations included:

- Storage calculations used in the EWMP appeared to significantly underestimate required wastewater storage volume
- A berm was not present at the west entrance to the feed lane from Whispering Lakes Lane
- Manure accumulation between six to eight inches observed in corral

SECTION III – OBSERVATIONS

- The concrete spillway had an accumulation of soil on top of the spillway which may block the spillway or cause erosion in event of overflow event.

- The amount of manure hauled from Dairy No 2 to Kellogg composting was not clear.

SECTION IV – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

- No potential violations
- The 2014 Manure Tracking Manifest and facility documentation did not appear to clearly document the destination of manure. Facility documentation of manure handling was not available on-site.
- The 2014 annual report did not contain nutrient analysis; the nutrient analysis was not available on-site.

SECTION V – DOCUMENTS REQUESTED DURING INSPECTION AND ANALYTICAL RESULTS

✓ Engineered Waste Management Plan was available on-site
✓ Weekly Storm Water Management Structure Inspections Log Sheets were available on-site
✓ Annual Report was available on-site
Manure Tracking Manifests was not available on-site
Manure nutrient analysis was not available on-site
N/a - Nutrient Management Plan Not required

APPENDICES

Appendix 1 – Inspection checklist
Appendix 2 – Photograph Log

Appendix 1- INSPECTION CHECKLIST

SANTA ANA REGIONAL WATER QUALITY CONTROL BOARD
INSPECTION REPORT

OFFICE NO: _____
INSPECTOR:_____ PCA SYSTEM TASK NO.: _____

WDID No.	OWNER NAME	FACILITY NAME
CAG018001 NPDES No.	OWNER ADDRESS	FACILITY ADDRESS
Site ID	OWNER CITY, STATE & ZIP	FACILITY CITY, STATE & ZIP
Actual Date Inspected	OWNER CONTACT	FACILITY CONTACT
	OWNER PHONE NO.	FACILITY PHONE NO.

J Inspection Agency (S=STATE, J=JOINT STATE/USEPA)

INSPECTION TYPE (Check One)

A1___ "A" type compliance--Comprehensive inspection in which samples are taken. (EPA Type S)
B1 **X** "B" type compliance--A routine nonsampling inspection. (EPA Type C)
02___ Noncompliance follow-up--Inspection made to verify correction of a previously identified violation.
03___ Enforcement follow-up--Inspection made to verify that conditions of an enforcement action are being met.
04___ Complaint--Inspection made in response to a complaint.
05___ Pre-requirement--Inspection made to gather info. relative to preparing, modifying, or rescinding requirements.
06___ Miscellaneous--Any inspection type not mentioned above. If this is an EPA inspection not mentioned above please note type. (e.g. biomonitoring, performance audit, diagnostic, etc.)

N Were violations noted during this inspection? (Yes/No/Pending Sample Results)
N Was this a Quality Assurance-Based inspection?
N Were bioassay samples taken? (N=no) If YES then, S= Static or F= Flow through.
N Were water quality samples collected?

INSPECTION SUMMARY

The overall facility rating, on a 1 (unreliable) to 5 (reliable) scale, was determined to be 3 = Satisfactory.

HISTORICAL INFORMATION (MOST RECENT):

Order No.	Adopted Date	Permit Type	Inspect Date	Inspection Type	Inspection Violations	Inspection Violation Type	Violation Date
R8-2013-0001	**6-7-13**	**NPDES**					

REVIEW OF FACILITY'S MOST RECENT ANNUAL REPORT

MANURE INFORMATION

Amount of manure spread on cropland at the facility: 0 tons

Amount of manure hauled away from the facility: 420 tons

Name(s) and address(es) of manure destination:

The 2014 annual report states that 1883 tons of manure were produced in 2014, and that 1463 tons were stockpiled on site as of 12/31/14 and 420 tons of manure were hauled away. The annual Manure Tracking Manifest states that Bosch hauls their own manure. The Manure Tracking Manifest states that 1883 tons were removed, and that 420 tons were delivered to Kellogg composting.

At the time of the inspection, documentation of manure hauling was not available. The operator stated the facility contact who hauls and tracks the loads was not available. Per the request of the inspectors, the operator provided two documents via email after the inspection to RWQCB Inspector Mr. Ed Kashask, who forwarded email to EPA Inspector John Tinger. The 2 documents were excel spreadsheets titled "Manure 2014" and "hauled Manure 2014". The spreadsheet titled "Manure 2014" indicates 70 loads totaling 420 tons were hauled from Dairy #1, and that, under the title "Dairy #1 stockpile", 266 loads totaling 1463 tons were hauled. The spreadsheet titled "hauled Manure 2014" indicates 420 tons of manure were hauled from Dairy #1, 630 tons from Dairy #2, and 534 tons from the Heifer ranch.

The operator indicated manure is hauled away almost immediately and that no manure is stored on-site. From the documentation, it is unclear how 1463 tons of manure was handled. No stockpiles of manure were observed on site during the inspection.

ENGINEERED WASTE MANAGEMENT PLAN (EWMP) REVIEW

Did the inspector review the most recent EWMP on file? Yes

Did the facility operator have a copy of the EWMP available onsite? Yes

Date EWMP originally prepared: 4/7/03

EWMP prepared by: Michael J Fox

Regional Board EWMP Acceptance Date: 9/30/09

EWMP Certification Letter Date and Source:

Was EWMP fully implemented? Yes

If not, list structures missing or deficient:

Other information related to the EWMP:

OPERATOR INSPECTION PARTICIPATION AND INPUT, AND DESCRIPTION OF WATER CONTAINMENT SYSTEM

EPA Inspector presented credentials and a short introduction meeting was held. The operator accompanied inspectors through the facility. A short close-out meeting was held to discuss preliminary findings. Operator was not provided advanced notice of inspection.

INSPECTION OBSERVATIONS

ANIMALS ONSITE DURING INSPECTION;

Milk Cows:	500	Dry Cows:	100	Heifers:	100	Calves:		Other:	#

INSPECTION SPECIFIC MANURE AND WASTEWATER INFORMATION:

DISCUSSION OF FACILITY HOUSEKEEPING:
No issues noted. No stockpiles of manure were observed on site.

TYPICAL DEPTH OF MANURE IN CORRALS: < 6”
DATE CORRALS WERE LAST SCRAPED:
ESTIMATED FREEBOARD IN FULLEST LAGOON: All EWMP freeboard available.
DATE OF LAST LAGOON SOLIDS REMOVAL, PER FACILITY REPRESENTATIVE: Operator did not know the last time solids were removed.
DISPOSAL LOCATION FOR LAGOON SOLIDS: No known disposal of solids.

CONDITION OF BERMS AND CONTAINMENT STRUCTURES:

The southern ponds were dry. The operator did not know the last time solids were removed from the ponds. There was no evidence of accumulation of manure or solids in the southern ponds.

No evidence of significant rodent damage, erosion, or excess vegetation along berms was observed. Ponds generally clear of vegetation.

POTENTIAL VIOLATIONS (IF APPLICABLE)

DATE OF POTENTIAL VIOLATION:_____
DATE OF POTENTIAL VIOLATION DETERMINATION:_____
DESCRIPTION OF VIOLATION:

ADDITIONAL COMMENTS, SPECIAL INSTRUCTIONS, FUTURE INSPECTION FOLLOW UP ETC.

None.

Appendix 2 – Photograph Log

The photographs were taken during the inspection by John Tinger. Original copies of the photos are maintained by EPA Region 9.

Photo 1: Facility overview google earth.

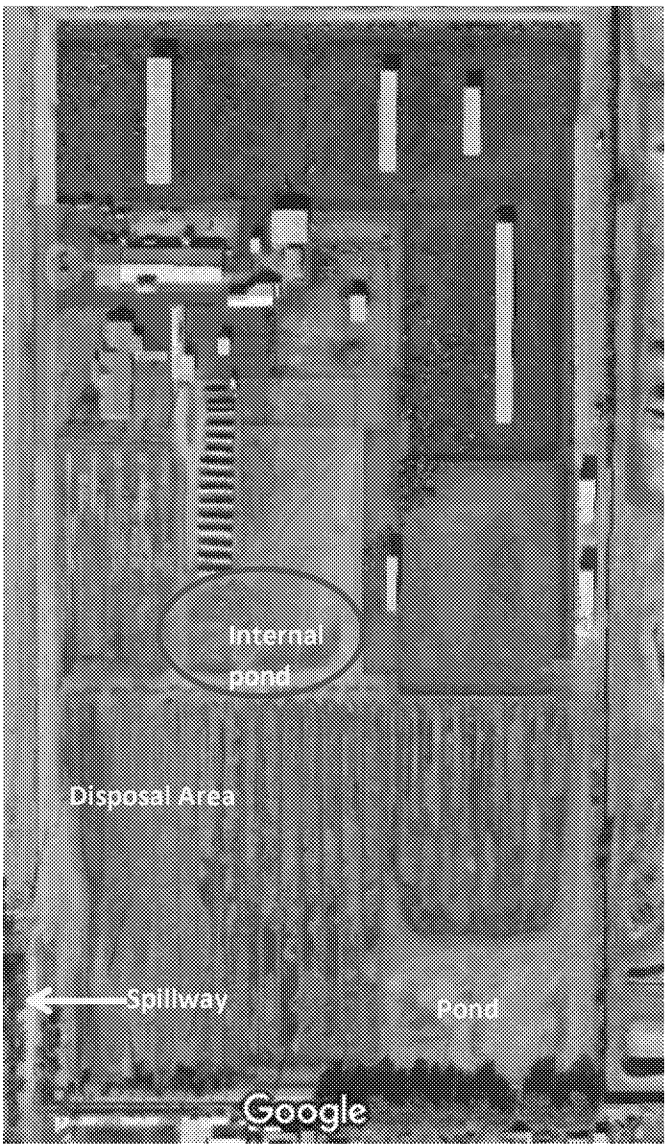

Photo 2: northern boundary of facility looking west.

Photo 3: Pit dug in northwest section of facility to prevent discharge of feed materials onto roadway.

Photo 3: Pit dug in northwest section of facility to prevent discharge of feed materials onto roadway.

Photo 4: Corrals

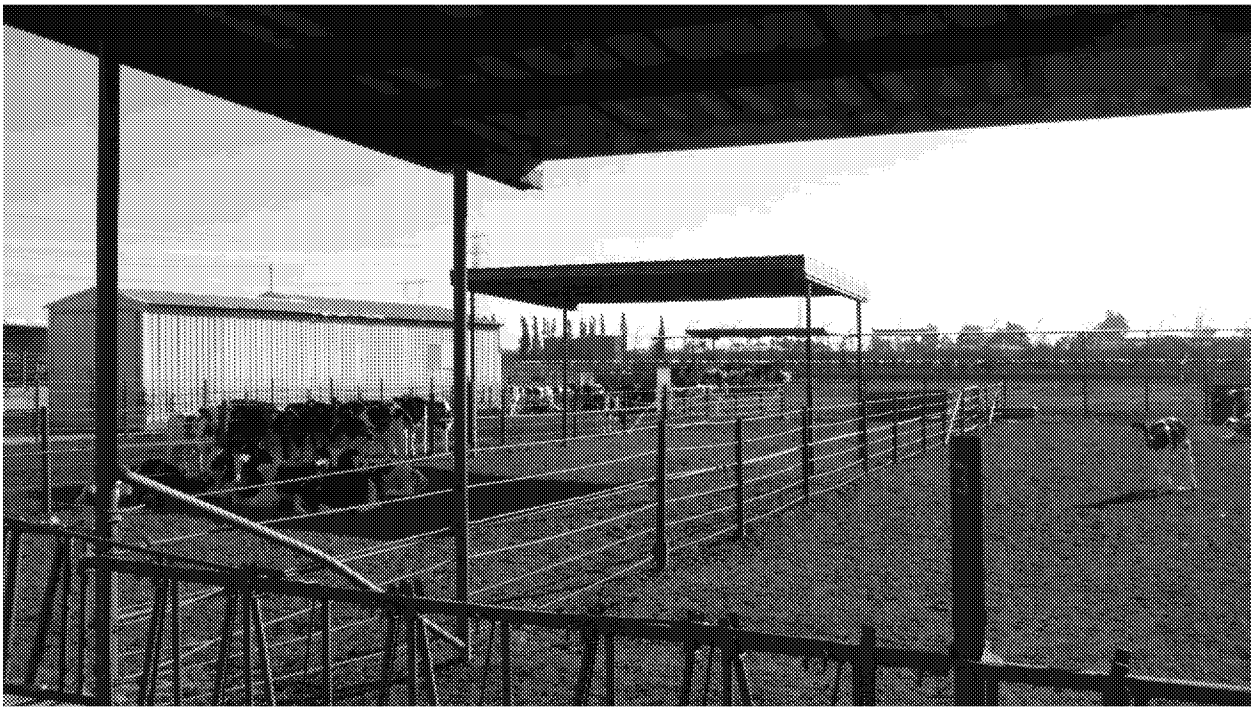

Photo 5: pond / berm at southeast corner of facility, looking southeast

Photo 6: View of pond berm at southern edge of facility; looking west.

Photo 7: Berm along western edge of facility, looking north.

Photo 8: Spillway; sediment accumulation on top of concrete.