

National Pollutant Discharge Elimination System (NPDES) Permit Program

F A C T S H E E T

Regarding an NPDES Permit To Discharge to Waters of the State of Ohio
for the **Trillium Farm Holdings, LLC Croton Facilities**

Public Notice No.	12-08-083	OEPA Permit No.:	4IK00014*AD / OH0131121
	12-08-084		4IK00015*AD / OH0131130
	12-08-085		4IK00016*AD / OH0131148
	12-08-086		4IK00017*AD / OH0131156
	12-08-087		4IK00018*AD / OH0131164
	12-08-088		4IK00019*AD / OH0131172
	12-08-089		4IK00020*AD / OH0131181
	12-08-090		4IK00021*AD / OH0131199
	12-08-091		4IK00023*AD / OH0136077

Public Notice Date: August 24, 2012
Comment Period Ends: September 24, 2012

Name and Address of Applicant:

**Trillium Farm Holdings, LLC
10513 Croton Road
Johnstown, OH 43031**

Receiving Water: **See Table 1**

Name and Address of Facility Where
Discharge Occurs:

**See Table 1
Licking County**

Subsequent
Stream Network: **See Table 1**

Introduction

Development of a Fact Sheet for NPDES permits is mandated by Title 40 of the Code of Federal Regulations, Section 124.8 and 124.56. This document fulfills the requirements established in those regulations by providing the information necessary to inform the public of actions proposed by the Ohio Environmental Protection Agency, as well as the methods by which the public can participate in the process of finalizing those actions.

This Fact Sheet is prepared in order to document the technical basis and risk management decisions that are considered in the determination of water quality based NPDES Permit effluent limitations. The technical basis for the Fact Sheet may consist of evaluations of promulgated effluent guidelines, existing effluent quality, instream biological, chemical and physical conditions, and the relative risk of alternative effluent limitations. This Fact Sheet details the discretionary decision-making process empowered to the Director by the Clean Water Act and Ohio Water Pollution Control Law (ORC 6111). Decisions to award variances to Water Quality Standards or promulgated effluent guidelines for economic or technological reasons will also be justified in the Fact Sheet where necessary.

Procedures for Participation in the Formulation of Final Determinations

The draft action shall be issued as a final action unless the Director revises the draft after consideration of the record of a public meeting or written comments, or upon disapproval by the Administrator of the U.S. Environmental Protection Agency.

Within thirty days of the date of the Public Notice, any person may request or petition for a public meeting for presentation of evidence, statements or opinions. The purpose of the public meeting is to obtain additional evidence. Statements concerning the issues raised by the party requesting the meeting are invited. Evidence may be presented by the applicant, the state, and other parties, and following presentation of such evidence other interested persons may present testimony of facts or statements of opinion. Requests for public meetings shall be in writing and shall state the action of the Director objected to, the questions to be considered, and the reasons the action is contested. Such requests should be addressed to:

**Legal Records Section
Ohio Environmental Protection Agency
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049**

Interested persons are invited to submit written comments upon the discharge permit. Comments should be submitted in person or by mail no later than 30 days after the date of this Public Notice. Deliver or mail all comments to:

**Ohio Environmental Protection Agency
Attention: Division of Surface Water
Permits and Compliance Section
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049**

The OEPA permit number and Public Notice numbers should appear on each page of any submitted comments. All comments received no later than 30 days after the date of the Public Notice will be considered.

Citizens may conduct file reviews regarding specific companies or sites. Appointments are necessary to conduct file reviews, because requests to review files have increased dramatically in recent years. For requests to copy more than 250 pages, there is a five-cent charge for each page copied. Payment is required by check or money order, made payable to Treasurer State of Ohio.

Table 1. List of Trillium Farm Holdings, LLC Croton Facilities

Facility	OEPA Permit No.	Application No.	Address	Receiving Water	Subsequent Network	Permitted Capacity*
Layer Site 1	4IK00014*AD	OH0131121	11995 Croton Rd. Croton, OH 43013	Unnamed Trib of Otter Fork	Otter Fork, North Fork, Licking River, Muskingum River, Ohio River	2,401,727 layers
Layer Site 2	4IK00015*AD	OH0131130	9300 Croton Rd. Croton, OH 43013	Unnamed Trib of Raccoon Creek	Raccoon Creek, South Fork, Licking River, Muskingum River, Ohio River	0 layers
Layer Site 3	4IK00016*AD	OH0131148	11652 Clover Valley Rd. Croton, OH 43013	Unnamed Trib of Otter Fork	Otter Fork, North Fork, Licking River, Muskingum River, Ohio River	2,489,066 layers
Layer Site 4	4IK00017*AD	OH0131156	11492 Westley Chapel Rd. Croton, OH 43013	Unnamed Trib of Raccoon Creek	Raccoon Creek, South Fork, Licking River, Muskingum River, Ohio River	2,314,284 layers
Pullet Site 1	4IK00018*AD	OH0131164	9550 Parsons Rd. Croton, OH 43013	Bowl Run	Otter Fork, North Fork, Licking River, Muskingum River, Ohio River	884,520 pullets
Pullet Site 2	4IK00019*AD	OH0131172	12280 Croton Rd. Croton, OH 43013	Otter Fork	North Fork, Licking River, Muskingum River, Ohio River	1,061,424 pullets
Pullet Site 3 (formerly Pullet Site 4)	4IK00021*AD	OH0131199	10127 Benner Rd. Croton, OH 43013	Unnamed Trib of Lobdell Creek	Raccoon Creek, South Fork, Licking River, Muskingum River, Ohio River	884,520 pullets
Breeder Layer 2 (formerly Pullet Site 3)	4IK00020*AD	OH0131181	9559 Jacob White Rd. Croton, OH 43013	Lobdell Creek	Raccoon Creek, South Fork, Licking River, Muskingum River, Ohio River	125,000 layers
Hatchery/ Breeder Pullet	4IK00023*AD	OH0136077	Hatchery - 10214 Crouse-Willison Rd. Breeder – 8251 Benner Rd. Johnstown, OH 43031	Bowl Run	Otter Fork, North Fork, Licking River, Muskingum River, Ohio River	125,000 layers 75,000 pullets

*The numbers of birds listed are the numbers provided by Trillium Farm Holdings, LLC in NPDES applications received by Ohio EPA in January, 2012.

Background

The National Pollutant Discharge Elimination System (NPDES), created under the Clean Water Act of 1972, provides a means for monitoring, tracking, and preventing discharges of pollutants to waters of the states. Section 301 of the Clean Water Act and 40 CFR 122.1(b) requires NPDES permits for the discharge of pollutants from any point source into waters of the State. Pursuant to Section 502(14) of the Clean Water Act and 40 CFR 122.2, a Concentrated Animal Feeding Operation (CAFO) is listed in the definition of a point source. A discharge can be considered any addition of any pollutant or combination of pollutants to water of the United States. This includes runoff from feedlots, stock piled manure, silage bunkers, overflow from storage ponds, overflow from animal watering systems, and runoff from fields on which manure is not applied in accordance with proper agricultural practices.

Waters of the United States not only include rivers, streams, intermittent streams and lakes, but also irrigation ditches, laterals, canals, etc. which eventually flow into rivers, streams, and lakes.

Other federal regulations require concentrated animal feeding operations to acquire an NPDES permit. These include, but are not limited to the following:

- 40 CFR 122.3: Establishes concentrated animal feeding operations as “point sources subject to the NPDES permit program”.
- 40 CFR 122.21: States that CAFOs which discharge have a duty to seek coverage under an NPDES permit.
- 40 CFR 122.23: Details the fact that CAFOs are point sources that require NPDES permits for discharges. Once an operation is defined as a CAFO, best management practices for CAFOs apply to all animals in confinement at the operation and all manure, litter and process wastewater generated by those animals or the production of those animals, regardless of the type of animal.

Based on 40 CFR 122.23, the Ohio Fresh Eggs, LLC Croton facilities meet the definition of large CAFOs and are required to obtain coverage under NPDES permits.

There are several pollutants associated with discharges from CAFOs, including: nutrients (particularly nitrogen and phosphorus), organic matter, solids, pathogens, and odorous/volatile compounds. Additional pollutants also include salts and trace elements and to a lesser degree antibiotics, pesticides, and hormones. These pollutants can enter the environment through a number of pathways, including: surface runoff and erosion, overflows from lagoons, spills and other dry-weather discharges, leaching into soil and groundwater, and volatilization of compounds and subsequent redeposition to the landscape. These discharges of pollutants can originate from animal confinement areas, manure handling and containment systems, manure stockpiles, and cropland where manure is applied. However, the NPDES permit will generally prohibit discharge of these to waters of the State.

Ohio Fresh Eggs, LLC Croton Layer Sites 1-4, Pullet Sites 1-3, Hatchery/ Breeder Layer 1, and Breeder Layer Site 2 are also permitted under the Ohio Department of Agriculture, Livestock Environmental Permitting Program (ODA, LEPP). In the June, 2011 Consent Order, agreed to by the previous owner, Ohio Fresh Eggs, LLC, the Croton facilities are limited to a maximum capacity of 7.2 million laying hens. The Consent Order also required the submittal of CAFO NPDES permit applications for all of the Croton and northwest facilities. The terms of the Consent Order carry over to the new operator, Trillium Farm Holdings, LLC. The northwest Ohio egg production facilities are covered under a separate fact sheet and separate permits.

Location of CAFO/Receiving Water Use Classification

The Trillium Farm Holdings, LLC Croton Layer Sites 1-4, Pullet Sites 1-3, Hatchery/Breeder Layer 1, and Breeder Site 2 are located around Croton, Ohio, Licking County in Hartford, Bennington, and Monroe Townships. See Table 1 for a description of the receiving stream and subsequent stream network for each facility. Figure 1 depicts the locations of the Croton sites along with the surrounding stream networks. Table 2 lists the designated uses for the receiving streams as stated in Ohio Water Quality Standards (OAC 3745-1-09 and 3745-1-24).

Table 2. Croton Facilities Receiving Stream Use Designation

Facility	Receiving Stream	Use Designation
Layer Site 1	Unnamed Tributary of Otter Fork (Otter Fork RM 11.72)	Limited Resource Water (small drainageway maintenance), Agricultural Water Supply, Industrial Water Supply, Secondary Contact Recreation
Layer Site 2	Unnamed Tributary of Raccoon Creek (Raccoon Creek RM 27.39) All Other Segments	Warmwater Habitat, Agricultural Water Supply, Industrial Water Supply, Primary Contact Recreation
Layer Site 3	Unnamed Tributary of Otter Fork	Limited Resource Water (small drainageway maintenance), Agricultural Water Supply, Industrial Water Supply, Secondary Contact Recreation
Layer Site 4	Unnamed Tributary of Raccoon Creek (Raccoon Creek RM 27.39) headwaters to Hartford Township Line (RM 2.2)	Limited Resource Water (small drainageway maintenance), Agricultural Water Supply, Industrial Water Supply, Secondary Contact Recreation
Pullet Site 1	Bowl Run	Warmwater Habitat, Agricultural Water Supply, Industrial Water Supply, Secondary Contact Recreation
Pullet Site 2	Otter Fork	Warmwater Habitat, Agricultural Water Supply, Industrial Water Supply, Primary Contact Recreation
Breeder Site 2 (formerly Pullet Site 3)	Lobdell Creek (From RM 13.79 to Crouse-Willison Rd)	Modified Warmwater Habitat (EOLP ecoregion – channel modification), Agricultural Water Supply, Industrial Water Supply, Secondary Contact Recreation
Pullet Site 3 (formerly Pullet Site 4)	Unnamed Tributary (Lobdell Creek RM 13.79)	Limited Resource Water (small drainageway maintenance), Agricultural Water Supply, Industrial Water Supply, Secondary Contact Recreation
Hatchery/ Breeder Layer 1	Bowl Run	Warmwater Habitat, Agricultural Water Supply, Industrial Water Supply, Secondary Contact Recreation

Facility Description

The nine Ohio Fresh Eggs, LLC Croton facilities are all large Concentrated Animal Feeding Operations. The following paragraphs describe each of the facilities. The facilities that have backflush wastewater from the drinking water treatment system discharge this wastewater into the egg wash water/wastewater ponds. The sanitary wastewater at the layer facilities is pre-treated in package wastewater treatment plants and is then discharged into the egg wash water ponds. The sanitary wastewater at Pullet Sites 1 and 2 is stored in holding tanks. The Breeder Site 2 utilizes a septic system at a house located at the site. Pullet Site 3 has an onsite septic system. The Hatchery/Breeder Layer 1 Sites utilizes a sand filter which then discharges to an egg wash water lagoon. The discharge of storm water associated with industrial activity (including contaminated stormwater) at the CAFOs will be authorized under the NPDES permits if the effluent maintains Ohio Water Quality Standards in the receiving waters. Construction of enhanced treatment systems for treating contaminated stormwater prior to its discharge is planned at all of the Croton Sites.

Layer Site 1

Layer Site 1 is designed to confine 2,401,727 laying hens. The facility contains 16 barns and an egg

washing facility. Layer 1 has been converted from the old high rise type of housing into belt battery housing. As stated in the NPDES permit application, approximately 27,365 tons of manure and 4.05 million gallons of egg wash water are produced annually. A manure storage building has been constructed to provide 250 days of solid manure storage with a total capacity of 1,259,200 cubic feet. The egg wash water lagoons have 440 total days of storage with a total capacity of 3.518 million gallons. The contaminated storm water pond has 278 days of storage with a total capacity of 17.6 million gallons. All of the solid layer manure is sold/gifted to crop farmers. The egg wash water is land applied through a center pivot system onto 29.1 acres of cropland.

Layer Site 2

Layer Site 2 is currently confining zero laying hens. The facility contains 16 barns and an egg washing facility. Construction is planned at Layer 2 to convert the old high rise type of housing into belt battery housing. An updated NPDES application will be required if the facility resumes animal production at the site. The egg wash water lagoons have a total capacity of 1.76 million gallons. The high rise barns have a total storage capacity of 2,645,760 cubic feet. The contaminated storm water pond has 88 days of storage with a total capacity of 5.62 million gallons. No manure or egg wash water is currently produced at the facility.

Layer Site 3

Layer Site 3 is designed to confine 2,489,066 laying hens. The facility contains 16 barns and an egg washing facility. Two manure storage buildings provide a combined total of 241 days of manure storage. As stated in the NPDES permit application, approximately 28,360 tons of manure and 2.9 million gallons of egg wash water are produced annually. The egg wash water lagoons have a combined 433 days of storage with a total capacity of 3.467 million gallons. The contaminated storm water pond has 170 days of storage with a total capacity of 14.1 million gallons. All of the solid layer manure is sold/gifted to crop farmers. The egg wash water and contaminated storm water are land applied through a center pivot system onto 40 acres of cropland.

Layer Site 4

Layer Site 4 is designed to confine 2,314,384 laying hens. The facility contains 16 barns and an egg washing facility. Two manure storage buildings provide a combined total of 212 days of manure storage. As stated in the NPDES permit application, approximately 34,478 tons of manure and 2.9 million gallons of egg wash water are produced annually. The egg wash water lagoons have 322 total days of storage with a total capacity of 2.582 million gallons. The contaminated storm water pond has 134 days of storage with a total capacity of 10.4 million gallons. All of the solid layer manure is sold/gifted to crop farmers. The egg wash water and contaminated storm water are land applied through a center pivot system onto 36.8 acres of cropland.

Pullet Site 1

Pullet Site 1 is designed to confine 884,520 pullets. The facility contains 5 barns. As stated in the NPDES permit application, approximately 3,284 tons of manure is produced annually. A manure storage barn has 337 days of storage with a total storage capacity of 250,560 cubic feet. The contaminated storm water pond has 218 days of storage with a total capacity of 3.78 million gallons. All of the solid manure is sold/gifted to crop farmers. The contaminated storm water is land applied through a center pivot system onto 9.9 acres of cropland.

Pullet Site 2

Pullet Site 2 is designed to confine 1,061,424 pullets. The facility contains 6 barns. As stated in the NPDES permit application, approximately 5,697 tons of manure is produced annually. A manure storage barn has 281 days of storage with a total storage capacity of 250,560 cubic feet. The contaminated storm water pond has 192 days of storage with a total capacity of 3.75 million gallons. All of the solid manure is sold/gifted to crop farmers. The contaminated storm water is land applied through a center pivot system onto 9.9 acres of cropland.

Pullet Site 3

Pullet Site 3 is designed to confine 884,520 pullets. The facility contains 5 barns. A manure storage barn provides 337 days of storage with a total capacity of 250,560 cubic feet. As stated in the NPDES permit application, approximately 3,284 tons of manure is produced annually. The contaminated storm water pond has 189 days of storage with a total capacity of 2.789 million gallons. All of the solid manure is sold/gifted to crop farmers. The contaminated storm water is land applied through a center pivot system onto 10 acres of cropland.

Breeder Site 2

Breeder 2 is designed to confine 125,000 layers. The facility contains 5 high rise barns. Manure is stored within the barns and they provide a combined total of 1,476 days of storage. As stated in the NPDES permit application, approximately 1,267 tons of manure are produced annually. The old high rise barns have 1,143 days of storage with a total storage capacity of 570,000 cubic feet. The contaminated storm water pond has 236 days of storage with a total capacity of 3.66 million gallons. All of the solid manure is sold/gifted to crop farmers. The contaminated storm water is land applied through a center pivot system onto 10.1 acres of cropland.

Hatchery/Breeder Pullet Site

The Hatchery Site is designed to confine 125,000 layers and 75,000 pullets in 5 high rise barns. Approximately 1,542 dry tons of manure are produced annually at this site with 2,284 days of storage available in the barns. The wastewater pond has 274 days of storage with a total capacity of 7.40 million gallons. Cockerels and eggshells from the hatchery are removed from the building by a vacuum system and stored in an overhead stainless steel tank until picked up by a rendering company, which is twice per week. The Breeder Site is designed to confine 75,000 pullets in two barns that are two-story with solid floors. The buildings are cleaned and bedding and manure removed every 18 weeks as pullets are moved into the hatchery barns. All of the solid manure is sold/gifted to crop farmers. The wastewater is land applied through a center pivot system onto 19.84 acres of cropland.

Description of Land Application Procedures and Available Land

As mentioned above, the solid manure generated at the facilities is sold/gifted to other individuals for land application. The egg wash water and contaminated storm water is land applied under the control of Trillium Farm Holdings, LLC. Trillium Farm Holdings, LLC currently has manure management plans developed through the Ohio Department of Agriculture in accordance with their Permits to Operate for each of the Croton facilities. These plans are available by contacting Ohio EPA. Please note that a portion of the manure management plan conditions become effective upon permit coverage, such as monitoring and inspection requirements, setbacks, timing restrictions, etc. See Section “Additional Effluent Limitations and Monitoring Requirements” below. As stated in Part II, Ohio EPA can notify Trillium Farm Holdings LLC at any time that the plans do not meet the minimum requirements of the permits and request plan modifications, which are required to be completed within 30 days of notification. It should be noted that comments regarding manure management plan requirements contained in the permit conditions should be made during this public notice period of the draft permits.

The NPDES permits will require Trillium Farm Holdings, LLC to manage and transport manure in such a fashion as to prevent leaks, spills, and runoff. For manure that is sold to another party, the buyer must be notified of nutrient properties contained in the manure as determined from laboratory manure analysis. Land applied egg wash water and contaminated storm water shall be managed in accordance with the Manure Management Plans (MMPs) and requirements of the NPDES permit. Storm water runoff discharges are allowed from land application fields to surface water, provided the egg wash water/contaminated storm water is applied in accordance with the MMP and the conditions of the permit. The discharge of contaminated stormwater after its treatment through enhanced treatment systems will be permitted at all of the Croton Sites provided the discharges meet Ohio Water Quality Standards, the effluent

limitations in the NPDES permits, and good housekeeping is practiced as required by the permit.

Receiving Water Quality / Environmental Hazard Assessment

Published biological and water quality information for the receiving streams of the Croton facilities is not currently available. However, a summary table of the biological sampling conducted in 1998 of streams in the vicinity of the Croton egg production facilities indicated that the headwaters of Otter Fork were in partial attainment of Warmwater Habitat and the lower portion was in full attainment, Bowl Run was in full attainment of Warmwater Habitat, Lobdell Creek was in non-attainment of Warmwater Habitat, and Raccoon Creek was in full attainment of Warmwater Habitat. Ohio EPA's *2010 Integrated Report* lists Lobdell Creek, North Fork Licking River (headwaters), and Raccoon Creek as impaired and a TMDL was predicted to have been completed in 2011.

Effluent Limitations and Monitoring Requirements

Part I, A of the NPDES permits contains an effluent limitation of no discharge of manure pollutants from the production area to waters of the State, including manure, egg wash water, and contaminated storm water. This limitation is in accordance with the March 2001 Consent Order.

Effluent limitations and monitoring requirements contained in Parts II and VII of the permit are based on 40 CFR Parts 122, 123, 412, OAC Chapters 901:10-2, United States Department of Agriculture Natural Resources Conservation Service (USDA-NRCS) Practice Standards, and best professional judgment.

The NPDES permits require the submission of an annual report to Ohio EPA in Part II that shall include at a minimum the following information:

1. The number and type of animals confined in the previous year.
2. Estimated amount of manure generated in the previous year in gallons or tons.
3. Total amount of manure removed from the facility for land application and/or distribution or utilization in gallons or tons.
4. Total number of acres for land application covered by MMP.
5. Total number of acres under the control of the permittee that were used for land application in the previous year.
6. Manure distribution or utilization records.
7. Summary of the number of discharges from the production area and the number of discharges from land application areas that were not composed of agricultural storm water runoff for the past year, including date, time and approximate volumes.
8. Information on any non-compliance not previously reported to Ohio EPA. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.
9. A statement indicating if the MMP was developed by a certified manure management planner.
10. A copy of the training/seminar attendance documentation as required by Part II, G of the permits.
11. The actual crop(s) planted and actual yield(s) for each field, the actual nitrogen and phosphorus content of the manure, the results of calculations conducted in accordance with Part II, "Annual Calculations" and the amount of manure applied to each field during the previous twelve months.

The NPDES permits include manure land application requirements in Part VII. These requirements include the development of a total nutrient budget for the operation, determination methods for appropriate manure application rates, record keeping requirements, application restrictions, and application timing restrictions.

The NPDES permits require specific monitoring and inspection requirements. The following table from

Part VII of the permit contains the requirements along with the justification for inclusion of the requirements in the permit.

A wasteload allocation is the portion of receiving water's loading capacity that is allocated to one of its existing or future point sources of pollution. Wasteload allocations were performed for the ammonia parameter for the proposed discharges from the Croton Ohio Fresh Eggs sites. The wasteload allocations take several factors into account including effluent flow rate, receiving stream flow rate, TMDL requirements, drainage areas, and temperature and pH of the receiving water. The instream water quality standard must be met at the edge of the mixing zone. Therefore, since the facilities are different with regard to the factors above they will have different NH_3 concentrations and loading rates.

Table 3. Monitoring and Inspection Requirements

Action	Frequency	Record Keeping Requirements	Justification
Grab samples shall be taken of all discharges from the production area. Clean storm water that has been diverted does not need to be sampled.	Each time they occur	Date and time of sample, results of analysis, and the information required in Part III, 5 and 6.	Best Professional Judgment – To ensure compliance with Part I, A of the permit.
All discharges from the production area and land application area shall be recorded in the operating record.	Each time they occur	Cause, volume, and duration of discharge and any corrective actions needed and the dates those actions were taken.	40 CFR Part 122.42 and 40 CFR Part 412.37 requires these records to be maintained.
In accordance with Part VII, B, 5 of this permit, grab samples shall be taken of discharges from land application areas where manure was applied on frozen and/or snow covered ground.	Each time they occur	Date and time of sample, results of analysis, and the information required in Part III, 5 and 6.	Best Professional Judgment – To ensure compliance with Part I, A and Part VII of the permit.
Representative samples of the manure to be land applied shall be taken from each source (e.g., each lagoon, storage tank, or permanent stockpile area must be sampled).	1/year	The information required in Part III, 5 and 6.	40 CFR Part 412.4 and 40 CFR Part 412.37 requires the sampling and records to be maintained.
Representative soil samples of the manure land application fields.	Every 3 years	The information required in Part III, 5 and 6.	40 CFR Part 412.4 and 40 CFR Part 412.37 requires the sampling and records to be maintained.
Monitor operating level of all manure storage or treatment facilities (including storm water ponds).	1/week	Date and time of observation, manure level in each structure.	40 CFR Part 412.37 requires the inspections and record keeping.
Inspect manure storage or treatment facilities, including devices channeling contaminated storm water to the manure storage or treatment facility for evidence of erosion, leakage, animal damage or discharge.	1/week	Date and time of inspection, structural integrity, vegetation condition, and any corrective actions needed and the dates those actions were taken.	40 CFR Part 412.37 and Best Professional Judgment require the inspections and record keeping.
Inspect storm water diversion devices or runoff diversion structures.	1/week	Date and time of inspection, observations of flow quantity and color, structural integrity (e.g. signs of cracks, sparse or stressed vegetation, erosion, etc.), any corrective actions needed and the dates those actions were taken.	40 CFR Part 412.37 and Best Professional Judgment require the inspections and record keeping.
Inspect drinking and cooling water lines that are located above ground, readily visible or accessible for daily inspection.	Daily	Date and time of inspection, number of leaks, any corrective actions needed and the dates those actions were taken.	40 CFR Part 412.37 requires the inspections and record keeping.
Monitor forecast at the CAFO location.	Every land application event	Date, weather conditions (including percentage chance of rain) 24 hours prior to application, at the time of application, and 24 hours after application.	40 CFR Part 412.37 and Best Professional Judgment require the monitoring and record keeping.
Inspect land application fields.	In accordance with MMP	Date and signs of discharge or runoff into surface waters and/or conduits to surface waters of the State.	Best Professional Judgment requires the monitoring and record keeping to document compliance with 40 CFR Part 412.4.
Inspect land application equipment.	In accordance with MMP	List of equipment, date of inspections, corrective actions, calibration dates.	40 CFR Part 412.4 and Best Professional Judgment require the inspections and record keeping.

Table 4. Discharge flow rates for Croton Ohio Fresh Eggs facilities

Facility	Discharge Flow Rate (Gallons Per Day)
Layer Site 1	63,400
Layer Site 2	63,600
Layer Site 3	83,000
Layer Site 4	77,500
Pullet Site 1	17,300
Pullet Site 2	19,900
Pullet Site 3	20,000
Breeder Layer 2	15,500
Hatchery/Breeder Pullet	23,000

Table 5. Detention Basin monitoring requirements for Croton Ohio Fresh Eggs sites and the basis for their recommendations.

Effluent Limits		Concentration		Loading (kg/day)		Justification
Parameter		30 Day	Daily	30 Day	Daily	
Flow Rate	GPD	-----	Monitor ^b	-----		BPJ ^a
Dissolved Oxygen	mg/L	-----	Monitor	-----		BPJ
Nitrogen Kjeldahl, Total	mg/L	-----	Monitor	-----		BPJ
Nitrite + Nitrate, Total	mg/L	-----	Monitor	-----		BPJ
E. Coli	#/100 mL	-----	Monitor	-----		BPJ
BOD ₅	mg/L	-----	Limits	-----		BPJ
Ammonia –N (NH ₃ -N)	mg/L	-----	Limits	-----		WLA ^a
Phosphorus, Total	mg/L	-----	Limits	-----		BPJ
pH	s.u.	-----	Limits	-----		BPJ
Suspended Solids, Total	mg/L	-----	Limits	-----		BPJ

^aDefinitions: BPJ = Best Professional Judgment, WLA = Waste Load Allocation

^bMonitoring of flow and other indicator parameters is specified to assist in the evaluation of effluent quality, frequency, and facility performance.

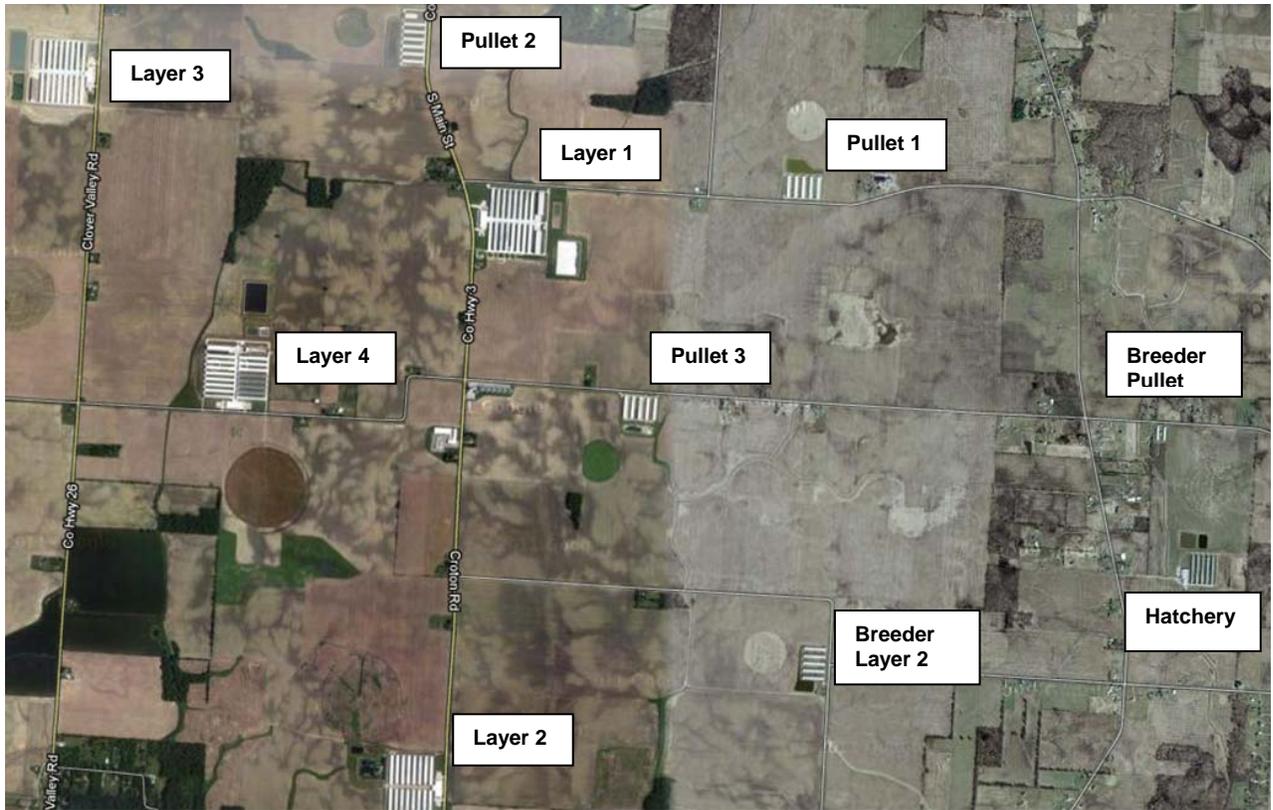


Figure 1. Location of Ohio Fresh Eggs, LLC Croton Facilities