



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JACKSON DISTRICT OFFICE



DAN WYANT  
DIRECTOR

December 12, 2014

Mr. Blaine Baker  
Bakerlads Farm  
10960 Cadmus Road  
Clayton, Michigan 49235

Dear Mr. Baker:

SUBJECT: National Pollutant Discharge Elimination System (NPDES)  
Permit No. MI0059009  
Designated Name: Bakerlads Farm-CAFO

Staff of the Department of Environmental Quality (DEQ), Water Resources Division (WRD), received a complaint alleging that Bakerlads Farm located at 10960 Cadmus, Clayton, Michigan, spread manure on frozen/snow-covered ground on a field not appropriate for manure applications to frozen or snow-covered ground.

Through discussion with yourself and review of the documents submitted in March 2014 to the DEQ for newly added fields, it was determined that in November 2014 manure was applied to snow-covered ground on a field for which The Natural Resources Conservation Service's Manure Application Risk Index (MARI) scores have not been submitted to the DEQ.

National Pollutant Discharge Elimination System (NPDES) CAFO Permit No. MI0059009, issued May 11, 2012, effective May 11, 2012 states: *On ground that is frozen or snow-covered, CAFO waste may be surface applied and not incorporated within 24 hours only if there is a field-by-field demonstration, in accordance with the Department 2005 Technical Standard for the Surface Application of CAFO Waste on Frozen or Snow-Covered Ground Without Incorporation or Injection (last page of this permit), showing that such land application will not result in a situation where CAFO waste may enter waters of the state.*

A copy of the complete 2005 Technical Standard for the Surface Application of Concentrated Animal Feeding Operations Waste on Frozen or Snow-Covered Ground Without Incorporation or Injection is included on page 30 of the permit enclosed with this letter. In accordance with the 2005 Technical Standard, a field must score a 37 or lower on the MARI to receive surface applied CAFO waste without incorporation within 24 hours while frozen or snow-covered (including no-till fields). At this time, the DEQ has not received documentation that the fields added to the farm in March of 2014 have been evaluated in accordance with the Technical Standard.

Please submit documentation of the MARI scores for the fields added to the farm in March 2014 (this should include fields: Beagle, Creger East, Creger North, Creger West, Creger-Townsend, Swartz, and Swartz2) to the DEQ by January 15, 2015.

Also enclosed with this letter is a copy of the complete NPDES CAFO Permit No. MI0059009 issued May 11, 2012, effective May 11, 2012 for your records. Please review this document as we have already identified a few differences between it and the draft document you have been using previously. Please feel free to contact me to discuss any additional differences you identify.

Mr. Blaine Baker  
Bakerlads Farm

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Thank you for your cooperation in these matters. Should you require further information, please contact me at 517-780-7917 or DEQ, WRD, Jackson District Office, 301 East Louis Glick Highway, Jackson, Michigan 49201-1556.

Sincerely,



Rachel Koleda  
Environmental Quality Analyst  
Water Resource Division

Enclosure

CC: File: Bakerlads Farm-CAFO, MI0059009, CAFO, Lenawee County