



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
JACKSON DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

January 18, 2018

Mr. Brad Hart
Hartland Farms
1580 Hughes Highway
Clayton, Michigan 49235

CC No. CC-000957

Dear Mr. Hart:

SUBJECT: NPDES Permit No. MI0057536
Designated Name: Hartland Farms-CAFO

On September 29, 2017, staff of the Michigan Department of Environmental Quality (MDEQ), Water Resources Division (WRD), conducted an evaluation of Hartland Farms-CAFO, located at 1580 Hughes Road, Clayton, Michigan, to evaluate the facility's compliance with Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; National Pollutant Discharge Elimination System (NPDES) Permit No. MI0057536, issued and effective October 23, 2012.

Mr. Chad Hart participated in the inspection, which included an inspection of the facility, a complete review of permit required reports and records, and a review of facility operation and maintenance. Hartland Farms is a concentrated animal feeding operation (CAFO) with approximately 950 mature dairy cows, 80 dry cows, 235 bred heifers and 230 calves. The facility collects and stores production area wastewater within waste storage structures located on the farmstead and then land applies the material to agricultural fields at agronomic rates. A copy of the full inspection report can be obtained through the MiWaters database by going to the Documents section and typing "E-A6E4-CF-A4D9" into the search filter at the top of the Source Name Column. No significant operation or maintenance issues were noted, however, the following items were identified and/or discussed during the inspection.

1. The facility is currently keeping land application records, however, the current MDEQ approved form is not being used and not all permit required information is being recorded. A copy of the current MDEQ approved daily land application form is enclosed with this letter. This form should be used to record all future land applications completed by the farm; the form should be filled out completely for each day that manure application occurs. Utilization of these record forms will be reviewed in greater detail during the next inspection; but to verify that the form is being used, **please provide a copy of a recently completed land application record form to the WRD by June 1, 2018.**

During the inspection, the application of manure to fields where soybeans have recently been harvested was also discussed. The farm identified soil erosion as a significant management concern on these fields and outlined their method for manure application to mitigate this concern. The farm's manure application method on these fields consists of surface applying manure on the field in the fall, followed by vertical tillage just prior to planting the following spring. When managed in this way, these fields are considered as locations where no-till practices are being used and meet the incorporation exceptions listed in Part I. A. 4. B. 7. F (page 12) of the facility's

permit. As noted during this discussion, the land application must still meet all other permit requirements and this practice should not be used on fields where CAFO waste may enter waters of the state.

In addition to the inspection on September 29, 2017, WRD staff have also completed a review of the 2016 annual report submitted for Hartland Farms. Below is a summary of the review; **the items below should be reviewed and requested responses should be provided to the WRD by March 1, 2018.**

- The total phosphorus application for fields 92 and 93 appears to be high for two year removal rate based on the listed crop. Please provide a summary of how the agronomic rate was calculated for these fields.
- The 2016 annual report indicates that the nutrient application rate for field 91 was based on a two year utilization rate for phosphorus, however, this field also appears on the spread plan for 2017 to receive 10,000 gallons per acre of manure. Please provide a summary of nutrient application and removal on this field demonstrating how these nutrients will be utilized.

Thank you for your cooperation in these matters. Should you require further information, please contact me at 517-416-4073; burns6@michigan.gov; or MDEQ, WRD, Jackson District Office, 301 East Louis Glick Highway, Jackson, Michigan 49201-1535.

Sincerely,



Rachel Burns
Environmental Quality Analyst
Water Resources Division

Enclosure

cc/enc: Mr. Chad Hart, Hartland Farms
Ms. Beth Gruden, Blue Wing Consulting