



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
JACKSON DISTRICT OFFICE



C. HEIDI GREETHER  
DIRECTOR

September 21, 2018

CC No. CC-001348

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

Dear Mr. Hart:

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

On August 27, 2018, 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, Lenawee County, 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. Brad Hart, with Hartland Farms, and Ms. Rachel Burns, with WRD, participated in the evaluation, which included an interview, records review, and site inspection. This evaluation was conducted in response to a complaint received by the WRD on August 15, 2018 regarding a suspected discharge of manure to a portion of the South Branch River Raisin near one of Hartland Farm's land application fields (field 60). WRD staff conducted an inspection of the suspected discharge location (near the road/stream crossing on Morey Highway, north of Beecher Road) on August 15, 2018. During that inspection the presence of unnatural turbidity, unnatural color and foul odor were noted within the water in the South Branch River Raisin, however, the source could not be positively identified. The recent application of CAFO waste to fields 60 by Hartland Farms was identified as a possible source and was further reviewed during the evaluation on August 27, 2018.

The following items were identified and/or discussed during the evaluation.

1. Hartland Farms acknowledged the presence of unnatural turbidity, color and odor within the water in the South Branch River Raisin on August 15, 2018, however, the farm stated they were not aware of any field conditions or conveyances that would have allowed CAFO waste applied to field 60 to reach the drain.
2. On August 27, 2018, Hartland Farms provided complete copies of daily land application records for the application of CAFO waste to fields 60 and 61. The records corroborated information that had been provided verbally by both the farm during the site inspection on August 15, 2018 and information that had been provided by the complainant when the suspected discharge was reported to the WRD. The daily land application records were complete and included all information as required in NPDES Permit No. MI0057536.

3. At the time of the inspection field 60 had been planted to alfalfa. Field tile (draining to a county tile to the southeast) was known to be present within the southern portion of the field, however, no field tile was known to be present in the northern section of the field. The farm indicated that farm staff had closely examined the field for any signs of broken or otherwise damaged tile during all field work occurring after August 15, 2018. No signs of damaged tile were found by farm staff and none were visible during the field inspection. During the field inspection, Mr. Brad Hart identified a tile riser located near the northeastern corner of the field (on the eastern field border) and draining to the South Branch River Raisin. The location of this tile riser was not included in field assessment maps within Hartland Farm's Comprehensive Nutrient Management Plan (CNMP). Upon further discussion, Hartland Farms indicated that this tile riser had not been included in their field assessment maps because it was not a riser or tile system that they own. The location and appropriate land application setbacks for this tile riser need to be added to Hartland Farm's CNMP. The tile riser collects surface runoff from a large portion of field 60 and will need to be monitored as required in NPDES Permit No. MI0057536 during all future applications of CAFO waste to the field.
4. To ensure that a complete and thorough field assessment has been completed for field 60, it was also discussed during the evaluation that the section of the drain (South Branch River Raisin) near the northern portion of field 60 needs to be inspected for any tile outlets. This was discussed during the inspection and Hartland Farms indicated that this inspection would be completed during the late fall or winter months when the vegetation is gone.
5. Hartland Farm's CNMP will need to be updated to accurately reflect all new information collected as part of the field assessment, including any newly identified tile outlets and additional portions of field 60 that are determined to be drained by field tile.

Please respond to items 3, 4, and 5, above, by providing an updated copy of the CNMP to the WRD by April 1, 2019. The updates to the CNMP should include the updated field assessment map for field 60 and any corresponding updates to the field summary information table. Along with the updated CNMP, please include a brief written summary of what changes were made to the CNMP and how the changes were identified (i.e. was a tile outlet identified during an inspection, was the location of field tile identified using aerial images, etc....) This response should be submitted through MiWaters.

Thank you for your cooperation in these matters. If you have any factual information you would like us to consider regarding the complaint response or schedule of compliance identified in this letter, please provide them as a written response.

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

cc: Ms. Beth Gruden, CNMP Provider, Blue Wing Consulting, LLC.  
Mr. Joe Kelpinski, MAEAP Program Manager, MDARD