

I am in receipt of your Dan Heacock's July 9th, 2012 letter of incompleteness and respond herein via this email to each of the corresponding numbered items. NPDES No. ILA010079.

1. The Nutrient management plan follows the waste management plan requirements of 8 IAC, subpart H. The maps provided show the setbacks of Special Condition 4c. We would still need to do more work to provide colored maps. The setback acres have already been subtracted from the total field acres to provide the spreadable acres for each field. The soil types are shown on the soil survey field maps provided in the plan in appendix A as the slope is indicated by the legend. If no letter is indicated for the soil type number, the slope is generally less than 1%, while the B slope soil is 1 to 5%, C slope is 5 to 10%, etc.
2. The conditions outlined in the May 1, 2002 consent order are being followed and those related consent order setbacks are indicated on the field maps.
3. As most of these fields were previously strip mined, there are very few if any subsurface drainage systems within the fields. The operator is not aware of any open tile intake structures within 100 feet of land application fields. Subsurface drainage system outlets are to be checked during and after land application of livestock wastes. Livestock waste is either immediately injected subsurface or incorporated on the same day for solid manure.
4. Fields are not targeted to receive livestock wastes during frozen, ice or snow covered ground conditions.
5. Livestock waste is either immediately injected subsurface or incorporated on the same day for solid manure.
6. We believe that the Emergency Response Plan and Odor Control Plan are accurate and up to date. The silage, feed area runoff plans are current and all contaminated runoff is still collected and transferred to the lagoon.
7. The waste water flows from the Milking center has not changed. The human wastes continue to be handled via the septic system and the process wastewater flows by gravity to the existing lift station from which it is pumped to the lagoon.
8. Livestock waste is either immediately injected subsurface or incorporated on the same day for solid manure. The lagoon is loaded regularly and kept pumped down to minimize surface area and odor. The waste strength in the lagoon is low enough so that odor emissions are minimized.

Please note that the facility believes that permanent changes have been made to reduce the drainage area by diverting more clean storm water so that less volume is produced than in the past. The current operator believes that these changes along with better management enable this farm to operate without a discharge and as such a NPDES permit is not needed nor desired by the applicant.

Please feel free to email any further questions.

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