

Waste Management Plan For The Henry Tosta Dairy at 20662 San Jose Road In Tracy

WMP Signed By Henry Tosta on 17 September 2010

WMP Received By Regional Board on 21 September 2010

MAJOR ISSUES:

Page 3, Section A. Herd and Milking:

- List an erroneous total maximum permitted cow number of 1375 (milking + dry, including 15%); true total maximum permitted cow number is 1196 (milking + dry, including 15%)

Page 4, Section E. Milk Barn and Equipment Summary:

- List 120 days as the critical storage period. Because Mr. Tosta does not export any wastewater and lacks the infrastructure to land-apply lagoon wastewater a more appropriate figure would be closer to a 365 day storage period.

Page 8, Pond or Basin Description:

- The WMP lists Lagoon 1 as 12 feet deep and Lagoon 2 as 17 feet deep. Lagoons 3 thru 7 are listed as 6 feet deep. Note that groundwater beneath the dairy is at approximately 7 feet below ground surface.
 - Lagoons are not plumbed to freely move/transfer wastewater between one another
 - Lagoon 1 sits at a lower elevation than Lagoon 2 and is not plumbed to transfer wastewater to Lagoon 2 even though the WMP states that wastewater in Lagoon 1 flows into Lagoon 2 (no piping, no pumps)
 - High solids accumulation within the lagoon system inhibits any ability to transfer/store wastewater
 - Lagoon embankments/boundaries are not clearly defined and nearly nonexistent
 - Lagoon 1 is accounted for twice, once as a solid separation facility (should not be included in storage calculations) and once as a storage lagoon (included in storage calculations)

Page 15, Storage Volume Assessment:

- WMP states that the dairy has 5.4 million gallons of storage capacity more than needed, using a 120 day storage period,
 - Note: No excess storage capacity has been observed.

Maps:

- Cropland managed by the dairy is not included on maps
- Monitoring wells are not listed, Note: Three monitoring wells exist onsite.

- Maps do not accurately reflect all onsite manure storage areas (including 3 to 4 acre manure storage area)
- Wastewater flow direction arrows shown on the maps do not reflect actual wastewater flow directions
- Maps do not identify surface waters located to the immediate north and east of the dairy production area
- Maps are not drawn on a published base map (like an air photo) as required by GO Attachment B, Section I, F, (5)
- Inconsistent nomenclature on the maps vs. the Rainfall and Runoff sections of the plan for features like buildings and corrals
- Maps missing storm water discharge points into the Naglee-Burk Canal from cropland
- Maps do not list crops grown on dairy cropland

Operation & Maintenance Plan:

- Lists Sisk Tallow as the mortality management service, but this is untrue
- Clean-out protocols have not been followed or are fictitious

Production Area Design & Construction Report:

- Production Area Design & Construction Report. Signed by Mr. Henry Tosta on 17 September 2010, Received on: 21 September 2010
 - Certifies entire production area drains into ponds and any modifications or improvements identified have been completed.
 - Note: Lack of Maintenance of current infrastructure inhibits any drainage to the ponds

Waste Management Plan Modification Progress Status Report:

- Waste Management Plan Modification Progress Status Report was signed by Mr. Henry Tosta on 13 December 2010 and received 15 December 2010
 - Certified that No Modifications were needed for : (1) Storage Capacity, (2) Flood Protection, or (3) Design of Production Area

MINOR ISSUES:

Page 3, Section A (Herd and Milking):

- "Daily Flush Hours" entered are inconsistent with the onsite dairy operation.
 - Manure from dry cows, heifers, and calves entering the lagoon system are underreported.

Page 3, Section B (Plate Cooler Type):

- "None" is listed. Typically dairies have a well water cooled plate cooler.

Page 3, Section C (Sprinklers Used):

- No Sprinklers used in the wash pen. Typically scraped dairies use sprinklers.

Page 4, Section A (Manure & Bedding Solids):

- No bedding volume is accounted for. Most freestall barns have bedding.

Page 6 & 7, Section D (Earthen Areas):

- *Production areas supposedly drain towards ponds, but this is untrue.*