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FUGITIVE DUST CONTROL PLAN

SIMPLOT FEEDERS LIMITED PARTNERSHIP

December 1, 2003

INTRODUCTION

Simplot Feeders Limited Partnership developed this Fugitive Dust Control Plan ("Plan") to implement Best Management Practices ("BMP") at our cattle feedlot operation. This Plan has been developed in order to implement reasonable precautions to minimize emissions of fugitive dust from the feedlot. The following BMP's were developed incorporating site specific characteristics of our operations.

SITE DESCRIPTION

Simplot Feeders is a Confined Animal Feeding Operations (CAFO) located in Walla Walla County, approximately 3.5 miles north of Wallula, Washington. The feedlot was constructed in 1970 and has been in operation since that time. Simplot Feeders purchased the operation in October, 1992. The feedlot and ancillary facilities are found principally on 705 acres within the E ½ of Section 34 and all of Section 35, less a portion of the SE ¼ thereof, within Township 8N., Range 31 E.W. M..

The facility is composed of open air fenced pens which are constructed on dirt and covered with manure to maintain moisture while providing a base for animals. Total pen area is approximately 294 acres or ~145 square feet per animal. Roadways are constructed with pit run gravel. Traffic roadways around the feed mixing mill, repair shops and office are covered with crushed rock. Feedlot conditions are affected by many variables including, but not limited to weather and operations.

METEOROLOGICAL DATA

Average precipitation from September 15 through April 15 is 6.97 inches, and April 16 to September 14 is 2.82 inches. The total yearly precipitation is 9.79 inches. (US Weather Service Station Data located at Ice Harbor Dam). Estimated annual average class "A" pan evaporation rate is approximately 44 inches per year.

DESCRIPTION OF BEST MANAGEMENT PRACTICES

PEN MAINTENANCE

Through out the year, Simplot Feeders performs pen floor maintenance. During the winter months, excess manure is removed from the pen. The rest of the year, Simplot Feeders use tractors with box scrapers for shaping and grooming the mounds and pen floor. As needed, excess manure is removed to maintain minimal loose manure. At times, cattle carve out wallows in the pen floor. When these occur, they are filled with a compacted clay type soil and covered with manure.

SPRINKLER SYSTEM

Simplot Feeders' Plan includes a computer controlled sprinkler system which is operational April 1st through October 15th. The system includes full and part circle sprinklers and allows individual sprinkler run times to be adjusted to maximize water application to minimize dust emissions. Run time for each sprinkler is based on several factors including but not limited to: visual pen floor condition, past and current weather conditions including rainfall, temperature, evapotranspiration. If necessary, the system may be operated 24 hours per day during hot, dry weather situations.

SPRINKLER SYSTEM DATA

- Approximately 3 hours per cycle (if full circles operate 4 minutes, half circles operate 2 minutes).
- Approximately 250,000 gallons applied per cycle.

WATER RIGHTS

Simplot Feeders has a water right issued by the state of Washington that provides a maximum diversion of 1,500 gallons per minute and a volume restriction of 525 million gallons per year. This is the water right that provides the water for the implementation of the BMP's contained in our plan.

WATER TRUCKS

Simplot Feeders' Plan includes the utilization of water trucks to control roadway dust. The roadway is constructed with pit run gravel providing an effective road base. Feed trucks traveling less than 15 miles an hour will make approximately 8 round trips per day. A water truck traveling less than 15 miles per hour will apply water to roadways using a rear-mounted splash plate to distribute the water. The water truck has a capacity of 3000 gallons and averages a load every 25 minutes. Roadways are watered according to conditions and usage.

Water trucks will be operated in a reasonable manner to control fugitive dust and emissions caused by feedlot weather, site and operational conditions. Generally, they start approximately one hour before other traffic usage occurs on the roads.

WATER TRUCK DATA

- 3000 gallon capacity
- Coverage per load: 10' x 4000', 0.12' water applied
- Truck operates as necessary to minimize fugitive emissions up to 20 hours per day, average a load every 25 minutes.
- 20 hours operation = 48 loads or 129,000 gallons

SITE-SPECIFIC FEATURES AND/OR CHARACTERISTICS

The following are several factors which complicate or affect the implementation of BMP's at our cattle feedlot operation:

- Simplot Feeders balances water application in relationship to animal health, which is affected by moisture and ambient air temperature. Low ambient temperatures can create health and/or respiratory problems for the cattle.
- Water application requires balancing effective dust control with control of odors and fly management program.
- Water application must be managed in conjunction with maintaining appropriate floor conditions for cattle.
- Water application at the Simplot Feeders site is complicated by wind conditions, pen size, and the necessity to ensure that the feed bunk area is protected from excessive moisture applications.
- Pens are sized to provide optimum livestock performance while minimizing emissions.
- Water application needs to be managed in conjunction with maintaining appropriate mound conditions for cattle.
- Water quality concerns created by runoff must be taken into consideration when using water for emission control.
- The sprinkler systems water distribution is affected by operational limitations. These include but are not limited to water pressure and system capacity.
- Feedlot terrain complicates the operation of some BMP's. The feedlot is located in an area where the landscape is rough and uneven. These physical factors affect water application rates and distribution uniformity. With the uneven pen surface, it is difficult to maintain minimal depth of loose manure.

RECORD KEEPING AND REPORTING DATA

Simplot Feeders will maintain the sprinkler system to assure reasonable performance and operation as designed. This includes:

Record Keeping And Reporting Data Cont'.

- Maintain, for one year, work orders documenting outside labor performed on the system and replacement parts used on the system.
- Will maintain a computer log of system operation and will mail a copy of the logs each month to Department of Ecology.
- Will maintain a daily log of water truck operation, (hours of operation, loads hauled) and will mail a copy of the logs each month to Department of Ecology.
- Will notify Department of Ecology Air Quality Program, within 5 working days, of operational concerns and non-typical conditions that may affect the ability to control the formation of fugitive dust.

GENERAL FACTORS

Cattle are fed a high moisture-content ration which produces above normal moisture-content in feces and increased amount of urine. Feces and urine will add additional .03 inches moisture each day at pen capacity. Normal cattle operations have cattle moving during morning hours, however, cattle will be moved at various times as required by feedlot operations, including doctoring or shipping.

OPERATIONAL CRITERIA

GENERAL OPERATIONAL PLAN

Simplot Feeders Fugitive Dust Control Plan includes a computer-controlled sprinkler system. The system is started approximately April 1, prior to conditions that create the formation of fugitive dust, and continues until October 15, assuming a normal weather year. The sprinkler system operational plan may utilize historical weather data from the LEGROW (USBR) REMOTE STATION "LEGROW" as a water application guide. The water application capacity of the sprinkler system provides Simplot Feeders' with the flexibility to apply sufficient water to mitigate impacts and to maintain adequate soil moisture in relationship to evapotranspiration.

Operation parameters will be affected by the following conditions:

- Daily weather conditions including ambient temperature factors associated with cool nights and warm days;
- Past weather data including evapotranspiration;
- Weather forecasts including but not limited to temperature, precipitation, and wind;
- Proper mound condition to maintain and promote animal health;
- Pen floor moisture and general condition of pens determined by physical checking of the site;
- Cattle inventory in relationship to moisture added by the number of cattle in pens;
- Extent of manure cover over the areas receiving water; and
- Odor and fly management.

General Operational Plan, Cont'.

- The Plan will be implemented to control formation of fugitive dust.
- The Plan will be implemented if fugitive dust is generated.
- Annual startup evaluation of the system and correct and/or repair performance deficiencies.
- Throughout the season, maintain and repair the system within a reasonable time to ensure proper sprinkler system performance and that the system is operating at the maximum designed pressure.
- Throughout the season, as necessary, use tractors with box scrapers for shaping and grooming the mounds and pen floor and as needed, excess manure is removed to maintain minimal loose manure.
- Time of day and frequency of water application will vary depending on weather, soil and feedlot conditions, including but not limited to pen conditions, recent and forecasted weather and cattle inventory.
- Simplot Feeders, within the limitations of the sprinkler system, has the capacity to maintain adequate soil moisture in relationship to evapotranspiration and rainfall factors
- Simplot Feeders may make modifications to the Plan as long as the effectiveness of the Plan is not compromised. Simplot Feeders will notify Ecology of changes to the Plan
- The Department will notify Simplot Feeders if they have any concerns, issues and/or modifications regarding our Plan

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BMP Plan Submittal for Simplot Feeders



Ron Parks
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(Date)