

State of North Carolina
Department of Environment and Natural Resources
Division of Water Quality

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MAY 30 2012

Animal Waste Management Systems
Request for Certificate of Coverage
Facility Currently Covered by an Expiring NPDES General Permit

Aquifer Protection Section

On July 1, 2012, the North Carolina NPDES General Permits for Animal Waste Management Systems will expire. Facilities that have been issued Certificates of Coverage to operate under these NPDES General Permits must apply for renewal within 30 days of receipt of this application.

Please do not leave any question unanswered. Please make any necessary corrections to the data below.

- Facility Number: 90-1 and Certificate of Coverage Number: NCA490001
- Facility Name: Simpson's Eggs, Inc
- Landowner's name (same as on the Waste Management Plan): _____
- Landowner's mailing address: 5015 HWY 218 E
City/State: Morris NC Zip: 28110
Telephone Number (include area code): 704/223-1478 E-mail: simpsons.eggs@aol.com
- Facility's physical address: 5015 HWY 218 E
City/State: Morris NC Zip: 28110
- County where facility is located: Union
- Farm Manager's name (if different than the Landowner): Alex R. Simpson
- Farm Manager's telephone number (include area code): 704/221-3621
- Integrator's name (if there is not an integrator write "None"): None
- Lessee's name (if there is not a lessee write "None"): None
- Indicate animal operation type and number:

Swine

- Wean to Finish _____
- Wean to Feeder _____
- Farrow to Finish _____
- Feeder to Finish _____
- Farrow to Wean _____
- Farrow to Feeder _____
- Boar/Stud _____
- Gilts _____
- Other _____

Cattle

- Dairy Calf _____
- Dairy Heifer _____
- Milk Cow _____
- Dry Cow _____
- Beef Stocker Calf _____
- Beef Feeder _____
- Beef Brood Cow _____
- Other _____

Dry Poultry

- Non Laying Chickens _____
- Laying Chickens 1,200,000 dry litter operation
- Turkeys _____
- Other _____
- Pullets _____
- Turkey Poults _____

Wet Poultry

- Non Laying Pullets _____
- Layers Non-operative - 0

↳ egg wash-water collected in storage pond.

COPY

Submit two (2) copies of the most recent Certified Animal Waste Management Plan (CAWMP). The CAWMP must include the following components. Some of these components may not have been required at the time the facility was certified but should be added to the CAWMP for permitting purposes:

- The Waste Utilization Plan (WUP) must include the amount of Plant Available Nitrogen (PAN) produced and utilized by the facility
- The method by which waste is applied to the disposal fields (e.g. irrigation, injection, etc.)
- A map of every field used for land application
- The soil series present on every land application field
- The crops grown on every land application field
- The Realistic Yield Expectation (RYE) for every crop shown in the WUP
- The PAN to be applied to every land application field
- Phosphorous to be applied on every land application field with a "HIGH" PLAT rating.
- The waste application windows for every crop utilized in the WUP
- The required NRCS Standard specifications
- A site schematic
- Emergency Action Plan
- Insect Control Checklist with chosen best management practices noted
- Odor Control Checklist with chosen best management practices noted
- Mortality Control Checklist with the selected method noted. A mass mortality plan must also be included.
- Site-Specific Conservation Practices necessary to prevent runoff of pollutants to waters of the State.
- PLAT results including datasheets for each field.
- Lagoon/storage pond capacity documentation (design, calculations, etc.); please be sure to include any site evaluations, wetland determinations, or hazard classifications that may be applicable to your facility
- Operation and Maintenance Plan

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MAY 30 2012

Aquifer Protection Section

I attest that this application has been reviewed by me and is accurate and complete to the best of my knowledge. I understand that, if all required parts of this application are not completed and that if all required supporting information and attachments are not included, this application package will be returned to me as incomplete. Note: In accordance with NC General Statutes 143-215.6A and 143-215.6B, any person who knowingly makes any false statement, representation, or certification in any application may be subject to civil penalties up to \$25,000 per violation. (18 U.S.C. Section 1001 provides a punishment by a fine of not more than \$10,000 or imprisonment of not more than 5 years, or both for a similar offense.)

Printed Name of Signing Official (Landowner, or if multiple Landowners all landowners should sign. If Landowner is a corporation, signature should be by a principal executive officer of the corporation):

Name: Richard L Simpson Title: Vice Pres

Signature: [Signature] Date: 1/10/12

Name: _____ Title: _____

Signature: _____ Date: _____

THE COMPLETED APPLICATION SHOULD BE SENT TO THE FOLLOWING ADDRESS:

NCDENR - DWQ Animal Feeding Operations Unit
1636 Mail Service Center
Raleigh, North Carolina 27699-1636
Telephone Number: (919) 807-6300
Fax Number: (919) 807-6354



Michael F. Easley, Governor

William G. Ross Jr., Secretary
North Carolina Department of Environment and Natural Resources

Coleen H. Sullins, Director
Division of Water Quality

August 1, 2007

Simpson's Eggs
Simpson's Egg, Inc.
5015 Hwy 218 E
Monroe, NC 28110

Subject: Certificate of Coverage No. NCA490001
Simpson's Egg, Inc.
Animal Waste Management System
Union County

EXISTING COC

Dear Simpson's Eggs:

In accordance with your application received on January 3, 2007, we are hereby forwarding to you this Certificate of Coverage (COC) issued to Simpson's Eggs, authorizing the operation of the subject animal waste management system in accordance with NPDES General Permit NCA400000.

This approval shall consist of the operation of this system including, but not limited to, the management and land application of animal waste as specified in the facility's Certified Animal Waste Management Plan (CAWMP) for the Simpson's Egg, Inc., located in Union County, with an animal capacity of no greater than the following wet system poultry annual averages:

Non-Laying Pullets: 0
Layers: 140000

} All birds converted to a dry litter system. Has a total of 1,200,000 birds

The COC shall be effective from the date of issuance until June 30, 2012 and replaces the NPDES COC issued to this facility with an expiration date of July 1, 2007. Pursuant to this COC, you are authorized and required to operate the system in conformity with the conditions and limitations as specified in the General Permit, the facility's CAWMP, and this COC. An adequate system for collecting and maintaining the required monitoring data and operational information must be established for this facility. Any increase in waste production greater than the certified design capacity or increase in number of animals authorized by this COC (as provided above) will require a modification to the CAWMP and this COC and must be completed prior to actual increase in either wastewater flow or number of animals.

Please carefully read this COC and the enclosed General Permit. This General Permit contains many new requirements than the previous NPDES General Permit. Enclosed for your convenience is a package containing the new and revised forms used for record keeping and reporting. Please pay careful attention to the record keeping and monitoring conditions in this permit. The Animal Facility Annual Certification Form must be completed and returned to the Division of Water Quality by no later than March 1st of each year.

If your Waste Utilization Plan has been developed based on site-specific information, careful evaluation of future samples is necessary. Should your records show that the current Waste Utilization Plan is inaccurate you will need to have a new Waste Utilization Plan developed.

The issuance of this COC does not excuse the Permittee from the obligation to comply with all applicable laws, rules, standards, and ordinances (local, state, and federal), nor does issuance of a COC to operate under this permit convey any property rights in either real or personal property.

One North Carolina
Naturally

Upon abandonment or depopulation for a period of four years or more, the Permittee must submit documentation to the Division demonstrating that all current NRCS standards are met prior to restocking of the facility.

Per 15A NCAC 02T .0111(c) a compliance boundary is provided for the facility and no new water supply wells shall be constructed within the compliance boundary. Per NRCS standards a 100-foot separation shall be maintained between water supply wells and any lagoon, storage pond, or any wetted area of a spray field.

Per 15A NCAC 02T .1306, any containment basin, such as a lagoon or waste storage structure, shall continue to be subject to the conditions and requirements of the facility's permit until closed to NRCS standards and the permit is rescinded by the Division.

Please be advised that any violation of the terms and conditions specified in this COC, the General Permit or the CAWMP may result in the revocation of this COC, or penalties in accordance with NCGS 143-215.6A through 143-215.6C including civil penalties, criminal penalties, and injunctive relief.

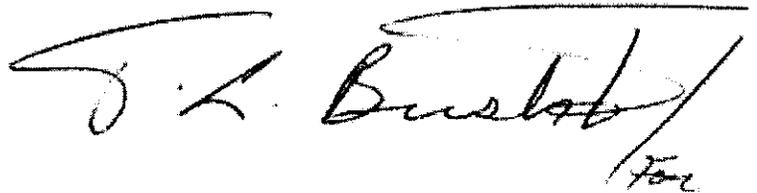
If you wish to continue the activity permitted under the General Permit after the expiration date of the General Permit, an application for renewal must be filed at least 180 days prior to expiration.

This COC is not automatically transferable. A name/ownership change application must be submitted to the Division prior to a name change or change in ownership.

If any parts, requirements, or limitations contained in this COC are unacceptable, you have the right to apply for an individual permit by contacting the staff member listed below for information on this process. Unless such a request is made within 30 days, this COC shall be final and binding.

This facility is located in a county covered by our Mooresville Regional Office. The Regional Office Aquifer Protection staff may be reached at (704) 663-1699. If you need additional information concerning this COC or the General Permit, please contact the Animal Feeding Operations Unit staff at (919) 733-3221.

Sincerely,

A handwritten signature in black ink, appearing to read "C. H. Sullins", with a large, sweeping flourish underneath. The signature is written over a horizontal line.

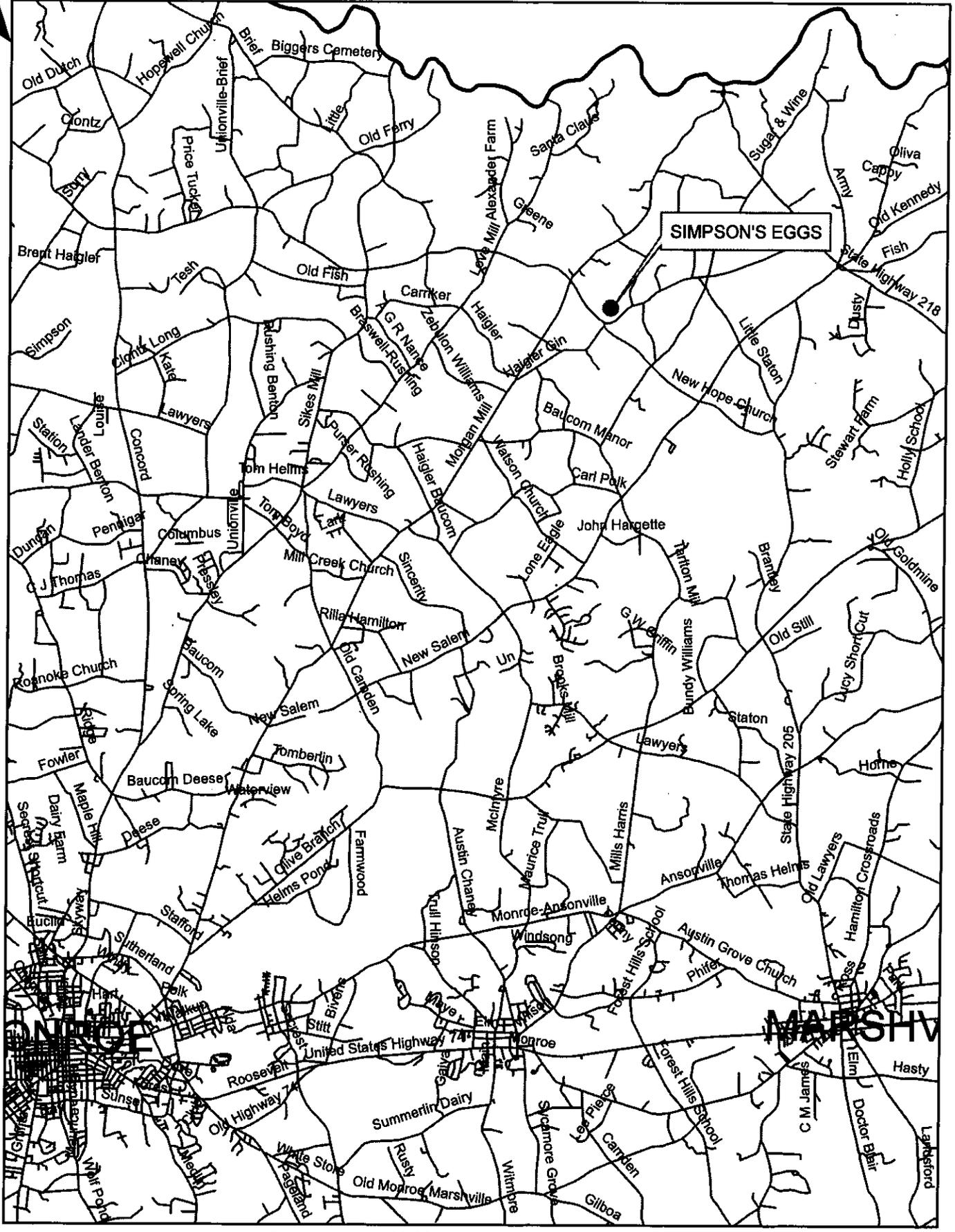
for Coleen H. Sullins

Enclosures (General Permit NCA400000, Record Keeping and Reporting Package)

cc: (Certificate of Coverage only for all cc's)
Union County Health Department
Union County Soil and Water Conservation District
Mooresville Regional Office, Aquifer Protection Section
AFO Unit Central Files
Permit File NCA490001

N

SIMPSON'S EGGS



20,000 10,000 0 20,000 Feet



MAY 30 2012

Aquifer Protection Section

Nutrient Management Plan For Animal Waste Utilization

04-05-2012

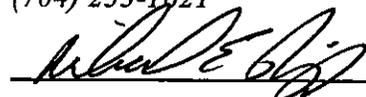
This plan has been prepared for:

Simpson Eggs
Simpson Eggs
5015 Hwy 218 East
Monroe, NC 28110
704-753-1478

This plan has been developed by:

Rick Pigg
NRCS
3230-B Presson Rd.
Monroe, NC 28110
(704) 233-1621

rpigg
@nc.usda.gov
@nc.mcbnet.net

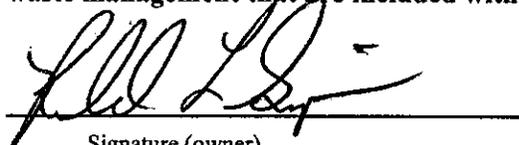


Developer Signature

Type of Plan: Nitrogen Only with Manure Only

Owner/Manager/Producer Agreement

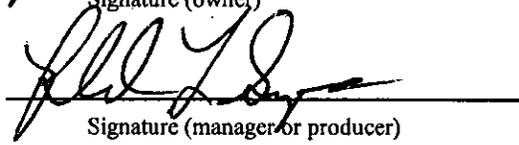
I (we) understand and agree to the specifications and the operation and maintenance procedures established in this nutrient management plan which includes an animal waste utilization plan for the farm named above. I have read and understand the Required Specifications concerning animal waste management that are included with this plan.



Signature (owner)

5/24/12

Date



Signature (manager or producer)

5/24/12

Date

This plan meets the minimum standards and specifications of the U.S. Department of Agriculture - Natural Resources Conservation Service or the standard of practices adopted by the Soil and Water Conservation Commission.

Plan Approved By:



Technical Specialist Signature

5/24/2012

Date

Nutrients applied in accordance with this plan will be supplied from the following source(s):

Commercial Fertilizer is not included in this plan.

U3	Wash Room waste generated 1,248,000 gals/year by a 1,200,000 animal Layer Lagoon Liquid operation. This production facility has waste storage capacities of approximately 120 days.				
Estimated Pounds of Plant Available Nitrogen Generated per Year					
Broadcast	335				
Incorporated	582				
Injected	648				
Irrigated	364				
	Max. Avail. PAN (lbs) *	Actual PAN Applied (lbs)	PAN Surplus/Deficit (lbs)	Actual Volume Applied (Gallons)	Volume Surplus/Deficit (Gallons)
Year 1	335	4576	-4,241	17,053,948	-15,805,948

Egg wash waste

U4	Simpson Egg Dry Waste waste generated 504.00 tons/year by a 1,200,000 animal Layer Paved Surface Scraped operation.				
Estimated Pounds of Plant Available Nitrogen Generated					
Broadcast	0				
Incorporated	0				
Injected	N/A				
Irrigated	N/A				
	Max. Avail. PAN (lbs) *	Actual PAN Applied (lbs)	PAN Surplus/Deficit (lbs)	Actual Quantity Applied (Tons)	Surplus/Deficit (Tons)
Year 1	0	0	0	0.00	504.00

Dry litter

This plan includes a User Defined Source to determine the total pounds of PAN in lieu of NRCS Standard values. Refer to North Carolina Cooperative Extension Service publication AG-439-42 entitled "Soil Facts: Use of On-Farm Records for Modifying a Certified Animal Waste Management Plan" for guidance on using on-farm records to develop a User Defined Source.

Note: In source ID, S means standard source, U means user defined source.

* Max. Available PAN is calculated on the basis of the actual application method(s) identified in the plan for this source.

Narrative

This plan is for Simpson Eggs poultry operation. This facility has approximately 1,200,000 layer hens. Two types of waste is produced, liquid and solid. The birds are housed in cages. The waste produced is collected in pits where it is combined with shavings to produce a solid waste. This waste is transferred to a commercial waste applicator who applies it to lands for which he has contracts. The eggs are conveyed to the "egg room" where they are processed for distribution. The wash water used in this process is conveyed to the lagoon. This waste is then applied to the fields shown in the waste plan (Tract 3998 Fld #1) via an in ground irrigation system. Owner/operator maintains adequate freeboard in this lagoon to prevent overflow from rainfall events. All application buffers are shown on the attached map as well as defined within the narratives of this plan and must be adhered to by the owner/operator. The dead bird mortality will be managed by rendering at an approved location. Owner/operator will keep all records as required by law and present when necessary to the necessary inspection personell.

The table shown below provides a summary of the crops or rotations included in this plan for each field. Realistic Yield estimates are also provided for each crop in the plan. In addition, the Leaching Index for each field is shown, where available.

Planned Crops Summary

Tract	Field	Total Acres	Useable Acres	Leaching Index (LI)	Soil Series	Crop Sequence	RYE
3998	1	44.50	32.00	1.0	Cid ✓	Fescue Pasture	4.4 Tons

PLAN TOTALS: 44.50 32.00

Leaching Index	Potential	Management
< 2	Low potential to contribute to soluble nutrient leaching below the root zone.	None
>= 2 & <= 10	Moderate potential to contribute to soluble nutrient leaching below the root zone.	Nutrient Management (590) should be planned.
> 10	High potential to contribute to soluble nutrient leaching below the root zone.	Nutrient Management (590) should be planned. Other conservation practices that improve the soils available water holding capacity and improve nutrient use efficiency should be considered. Examples are Cover Crops (340) to scavenge nutrients, Sod-Based Rotations (328), Long-Term No-Till (778), and edge-of-field practices such as Filter Strips (393) and Riparian Forest Buffers (391).

The Waste Utilization table shown below summarizes the waste utilization plan for this operation. This plan provides an estimate of the number of acres of cropland needed to use the nutrients being produced. The plan requires consideration of the realistic yields of the crops to be grown, their nutrient requirements, and proper timing of applications to maximize nutrient uptake.

This table provides an estimate of the amount of nitrogen required by the crop being grown and an estimate of the nitrogen amount being supplied by manure or other by-products, commercial fertilizer and residual from previous crops. An estimate of the quantity of solid and liquid waste that will be applied on each field in order to supply the indicated quantity of nitrogen from each source is also included. A balance of the total manure produced and the total manure applied is included in the table to ensure that the plan adequately provides for the utilization of the manure generated by the operation.

Waste Utilization Table

Year 1

Tract	Field	Source ID	Soil Series	Total Acres	Use, Acres	Crop	Applic. Period	Nitrogen PA Nutrient Req'd (lbs/A)	Comm. Fert. Applied (lbs/A)		Res. (lbs/A)	Applic. Method	Manure PA Nutrient Applied (lbs/A)	Liquid Manure Applied (acre)	Solid Manure Applied (acre)	Liquid Manure Applied (Field)	Solid Manure Applied (Field)
									N	N							
3998	1	U3	Cid	44.50	32.00	Fescue Pasture	8/1-7/31	143	0	0	0	Broad.	143	532.94	0.00	17,053.95	0.00
Total Applied, 1000 gallons													17,053.95				
Total Produced, 1000 gallons													1,248.00				
Balance, 1000 gallons													-15,805.95				
Total Applied, tons													0.00				
Total Produced, tons													0.00				
Balance, tons													0.00				

Notes: 1. In the tract column, ~ symbol means leased, otherwise, owned. 2. Symbol * means user entered data.

The Available Waste Storage Capacity table provides an estimate of the number of days of storage capacity available at the end of each month of the plan. Available storage capacity is calculated as the design storage capacity in days minus the number of days of net storage volume accumulated. The start date is a value entered by the user and is defined as the date prior to applying nutrients to the first crop in the plan at which storage volume in the lagoon or holding pond is equal to zero.

Available storage capacity should be greater than or equal to zero and less than or equal to the design storage capacity of the facility. If the available storage capacity is greater than the design storage capacity, this indicates that the plan calls for the application of nutrients that have not yet accumulated. If available storage capacity is negative, the estimated volume of accumulated waste exceeds the design storage volume of the structure. Either of these situations indicates that the planned application interval in the waste utilization plan is inconsistent with the structure's temporary storage capacity.

Available Waste Storage Capacity

Source Name	Wash Room	Design Storage Capacity (Days)
Start Date	3/1	120
Plan Year	Month	Available Storage Capacity (Days) *
1	1	89
1	2	120
1	3	120
1	4	120
1	5	89
1	6	59
1	7	28
1	8	47
1	9	120
1	10	89
1	11	59
1	12	28

* Available Storage Capacity is calculated as of the end of each month.

Required Specifications For Animal Waste Management

- 1. Animal waste shall not reach surface waters of the state by runoff, drift, manmade conveyances, direct application, or direct discharge during operation or land application. Any discharge of waste that reaches surface water is prohibited.**
- 2. There must be documentation in the design folder that the producer either owns or has an agreement for use of adequate land on which to properly apply the waste. If the producer does not own adequate land to properly dispose of the waste, he/she shall provide evidence of an agreement with a landowner, who is within a reasonable proximity, allowing him/her the use of the land for waste application. It is the responsibility of the owner of the waste production facility to secure an update of the Nutrient Management Plan when there is a change in the operation, increase in the number of animals, method of application, receiving crop type, or available land.**
- 3. Animal waste shall be applied to meet, but not exceed, the nitrogen needs for realistic crop yields based upon soil type, available moisture, historical data, climatic conditions, and level of management, unless there are regulations that restrict the rate of applications for other nutrients.**
- 4. Animal waste shall be applied to land eroding less than 5 tons per acre per year. Waste may be applied to land eroding at more than 5 tons per acre per year but less than 10 tons per acre per year provided grass filter strips are installed where runoff leaves the field (see USDA, NRCS Field Office Technical Guide Standard 393 - Filter Strips).**
- 5. Odors can be reduced by injecting the waste or by disking after waste application. Waste should not be applied when there is danger of drift from the land application field.**
- 6. When animal waste is to be applied on acres subject to flooding, waste will be soil incorporated on conventionally tilled cropland. When waste is applied to conservation tilled crops or grassland, the waste may be broadcast provided the application does not occur during a season prone to flooding (see "Weather and Climate in North Carolina" for guidance).**
- 7. Liquid waste shall be applied at rates not to exceed the soil infiltration rate such that runoff does not occur offsite or to surface waters and in a method which does not cause drift from the site during application. No ponding should occur in order to control odor and flies.**

- 8. Animal waste shall not be applied to saturated soils, during rainfall events, or when the soil surface is frozen.**
- 9. Animal waste shall be applied on actively growing crops in such a manner that the crop is not covered with waste to a depth that would inhibit growth. The potential for salt damage from animal waste should also be considered.**
- 10. Nutrients from waste shall not be applied in fall or winter for spring planted crops on soils with a high potential for leaching. Waste/nutrient loading rates on these soils should be held to a minimum and a suitable winter cover crop planted to take up released nutrients. Waste shall not be applied more than 30 days prior to planting of the crop or forages breaking dormancy.**
- 11. Any new swine facility sited on or after October 1, 1995 shall comply with the following: The outer perimeter of the land area onto which waste is applied from a lagoon that is a component of a swine farm shall be at least 50 feet from any residential property boundary and canal. Animal waste, other than swine waste from facilities sited on or after October 1, 1995, shall not be applied closer than 25 feet to perennial waters.**
- 12. Animal waste shall not be applied closer than 100 feet to wells.**
- 13. Animal waste shall not be applied closer than 200 feet of dwellings other than those owned by the landowner.**
- 14. Waste shall be applied in a manner not to reach other property and public right-of-ways.**
- 15. Animal waste shall not be discharged into surface waters, drainageways, or wetlands by a discharge or by over-spraying. Animal waste may be applied to prior converted cropland provided the fields have been approved as a land application site by a "technical specialist". Animal waste shall not be applied on grassed waterways that discharge directly into water courses, and on other grassed waterways, waste shall be applied at agronomic rates in a manner that causes no runoff or drift from the site.**
- 16. Domestic and industrial waste from washdown facilities, showers, toilets, sinks, etc., shall not be discharged into the animal waste management system.**

17. **A protective cover of appropriate vegetation will be established on all disturbed areas (lagoon embankments, berms, pipe runs, etc.). Areas shall be fenced, as necessary, to protect the vegetation. Vegetation such as trees, shrubs, and other woody species, etc., are limited to areas where considered appropriate. Lagoon areas should be kept mowed and accessible. Berms and structures should be inspected regularly for evidence of erosion, leakage, or discharge.**
18. **If animal production at the facility is to be suspended or terminated, the owner is responsible for obtaining and implementing a "closure plan" which will eliminate the possibility of an illegal discharge, pollution, and erosion.**
19. **Waste handling structures, piping, pumps, reels, etc., should be inspected on a regular basis to prevent breakdowns, leaks, and spills. A regular maintenance checklist should be kept on site.**
20. **Animal waste can be used in a rotation that includes vegetables and other crops for direct human consumption. However, if animal waste is used on crops for direct human consumption, it should only be applied pre-plant with no further applications of animal waste during the crop season.**
21. **Highly visible markers shall be installed to mark the top and bottom elevations of the temporary storage (pumping volume) of all waste treatment lagoons. Pumping shall be managed to maintain the liquid level between the markers. A marker will be required to mark the maximum storage volume for waste storage ponds.**
22. **Waste shall be tested within 60 days of utilization and soil shall be tested at least annually at crop sites where waste products are applied. Nitrogen shall be the rate-determining nutrient, unless other restrictions require waste to be applied based on other nutrients, resulting in a lower application rate than a nitrogen based rate. Zinc and copper levels in the soils shall be monitored and alternative crop sites shall be used when these metals approach excessive levels. pH shall be adjusted and maintained for optimum crop production. Soil and waste analysis records shall be kept for a minimum of five years. Poultry dry waste application records shall be maintained for a minimum of three years.**
Waste application records for all other waste shall be maintained for five (5) years.
23. **Dead animals will be disposed of in a manner that meets North Carolina regulations.**

Crop Notes

The following crop note applies to field(s): 1

Fescue: Piedmont

Adaptation: Well-adapted.

In the Piedmont, tall fescue can be planted Aug. 20 to Oct. 10 (best) and Feb. 15 to Mar. 20. For pure-stand broadcast seedings use 20 to 30 lb/ac., for drilled use 15 to 20 lb/ac. seed. Use certified seed to avoid introducing weeds or annual ryegrass. Plant seed 0.25" to 0.5" deep for pure stands, 0.25" in mixture with clovers. Soil test for preplant and maintenance lime, phosphorus, and potassium recommendations. Apply 40 to 60 lb/ac nitrogen at planting for pure stands only. Do not apply N for mixtures with clovers but use proper legume inoculation techniques. Apply 150 to 200 lb/ac. N to pure-stand fescue for hay production; reduce N rates by 25% for grazing. Apply N Feb. 1 to Mar. 20 and Aug. 20 to Sept. 30, with equal amounts in each window. Refer to NCSU Technical Bulletin 305 *Production and Utilization of Pastures and Forages in North Carolina* for additional information or consult your regional agronomist or extension agent for assistance.

NCDA&CS Agronomic Division Phone: (919)733-2655 Web site: www.ncagr.gov/agronomi/

Report: W05683

Grower: Simpson Farms-Simpson, Alex Copies to:

5015 Hwy 218 East
Monroe, NC 28110



Waste Analysis Report

Farm: 90-1

Received: 03/08/2012 Completed: 03/21/2012 Links to Helpful Information Union County

Sample Information Laboratory Results (parts per million unless otherwise noted)

Sample ID:	Laboratory Results (parts per million unless otherwise noted)													
PLANT	N	P	K	Ca	Mg	S	Fe	Mn	Zn	Cu	B	Mo	Cl	C
Total	13.7	26.5	15.7	136	20.3	59.5	0.99	0.26	0.25	0.27	0.21			
IN-N														
-NH4														
-NO3														
OR-N														
Lagoon Liquid (Other)														
		Na	Ni	Cl	Pb	Al	Se	Li	pH	SS	CuN	DM%	CE%	ALE(kgal)
		305							9.5					
Recommendations:	Nutrients Available for First Crop													
Application Method	N	Ca	Mg	S	Fe	Mn	Zn	T	T	T	T	Mo	Cl	Other Elements
Irrigation	0.05	0.79	0.12	0.35	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	Na Ni Cu Pb Al Se Li
														2.5

Completed: March 16, 2012

Sample Information Laboratory Results (parts per million unless otherwise noted)

Sample ID:	Laboratory Results (parts per million unless otherwise noted)													
W2012	N	P	K	Ca	Mg	S	Fe	Mn	Zn	Cu	B	Mo	Cl	C
Total	69.9	52.5	779	85.8	55.8	30.5	1.15	0.08	0.27	0.27	1.04			
IN-N														
-NH4														
-NO3														
OR-N														
Lagoon Liquid														
		Na	Ni	Cl	Pb	Al	Se	Li	pH	SS	CuN	DM%	CE%	ALE(kgal)
		386							7.21					
Recommendations:	Nutrients Available for First Crop													
Application Method	N	Ca	Mg	S	Fe	Mn	Zn	T	T	T	T	Mo	Cl	Other Elements
Irrigation	0.28	0.70	0.33	0.18	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	Na Ni Cu Pb Al Se Li
														3.2



Reprogramming of the laboratory-information-management system that makes this report possible is being funded through a grant from the North Carolina Tobacco Trust Fund Commission.

Thank you for using agronomic services to manage nutrients and safeguard environmental quality.

- Steve Troxler, Commissioner of Agriculture



Soil Test Report

SERVING N.C. RESIDENTS FOR OVER 60 YEARS

Grower: Simpson Farms-Simpson, Alex
5015 Hwy 218 East
Monroe, NC 28110

Copies To:

Farms: 90-1

Received: 01/06/2011 **Completed:** 03/03/2011 **Links to Helpful Information** **Union County**

Agonomist Comments

12. \$

Field Information		Applied Lime		Recommendations	
Sample No.	Last Crop	Mo	Yr	T/A	Crop or Year
50151					1st Crop: Fes/OG/Tlm,E 2nd Crop: Fes/OG/Tlm,M
					Lime 1.5T N 50-70 P2O5 0 K2O 0 Mg 0 S 0 Cu 0 Zn 0 B 0 Mn 0

Test Results

Soil Class	HM%	W/V	CEC	BS%	Ac	pH	P-I	K-I	Ca%	Mg%	Mn-I	Mn-AI(1)	Mn-AI(2)	Zn-I	Zn-AI	Cu-I	S-I	SS-I	NO3-N	NH4-N	Na
MIN	0.46	0.99	15.5	88.0	1.8	6.0	226	108	74.0	11.0	233	149	149	261	261	87	68				0.3

Field Information

Applied Lime		Recommendations			
Sample No.	Last Crop	Mo	Yr	T/A	Crop or Year
50152					1st Crop: Fes/OG/Tlm,E 2nd Crop: Fes/OG/Tlm,M
					Lime 0 N 50-70 P2O5 0 K2O 0 Mg 0 S 0 Cu 0 Zn 0 B 0 Mn 0

Test Results

Soil Class	HM%	W/V	CEC	BS%	Ac	pH	P-I	K-I	Ca%	Mg%	Mn-I	Mn-AI(1)	Mn-AI(2)	Zn-I	Zn-AI	Cu-I	S-I	SS-I	NO3-N	NH4-N	Na
MIN	0.22	1.00	17.4	94.0	1.0	6.6	329	186	75.0	14.0	197	126	126	328	328	96	71				0.3

Field Information

Applied Lime		Recommendations			
Sample No.	Last Crop	Mo	Yr	T/A	Crop or Year
50153					1st Crop: Fes/OG/Tlm,E 2nd Crop: Fes/OG/Tlm,M
					Lime 0 N 50-70 P2O5 0 K2O 0 Mg 0 S 0 Cu 0 Zn 0 B 0 Mn 0

Test Results

Soil Class	HM%	W/V	CEC	BS%	Ac	pH	P-I	K-I	Ca%	Mg%	Mn-I	Mn-AI(1)	Mn-AI(2)	Zn-I	Zn-AI	Cu-I	S-I	SS-I	NO3-N	NH4-N	Na
MIN	0.22	0.98	16.7	97.0	0.5	7.1	315	227	77.0	13.0	249	150	150	364	364	103	43				0.2



Reprogramming of the laboratory-information-management system that makes this report possible is being funded through a grant from the North Carolina Tobacco Trust Fund Commission.

Thank you for using agronomic services to manage nutrients and safeguard environmental quality.

- Steve Troxler, Commissioner of Agriculture

PLAT Results For: Union 4/5/2012 2:16:04 PM

INPUTS

Calendar Year: 2012
 County: Union
 Producer Identifier: Simpson Eggs
 Tract Number: 3998
 Field Number: 1
 Soil Series: CmB: Cid channery silt loam, 1 to 5 percent slopes
 Crop: Fescue (Pasture) :
 Fertilizers: Layer-Lagoon liquid
 Yearly Applied Amount: 1.5 ac in
 Lb P2O5: 52 lb
 Application Method: All other surface applications

Soil Loss: .013 t/ac/yr
 Receiving Slope Distance 50-99 ft
 Soil Test 0" - 4" 315
 WV_Factor (DATABASE) 1.1
 Artificial Drainage System: NO
 Hydrologic Condition: GOOD

OUTPUTS

PARTICULATE P = 0
 SOLUBLE P = 23
 LEACHATE P = 0
 SOURCE P = 5

TOTAL P RATING = 28 (MEDIUM)

Simpsons
Application

Eggs

Lagoon

HeadQuarter

25' No Waste
Buffer Zone

FLD 1A
6.8 Acres

FLD 1C
18.6 Acres

Non Owned
Residence

Owned Residence

200' No Waste
Buffer Zone

WELL

FLD 1B
6.6 Acres

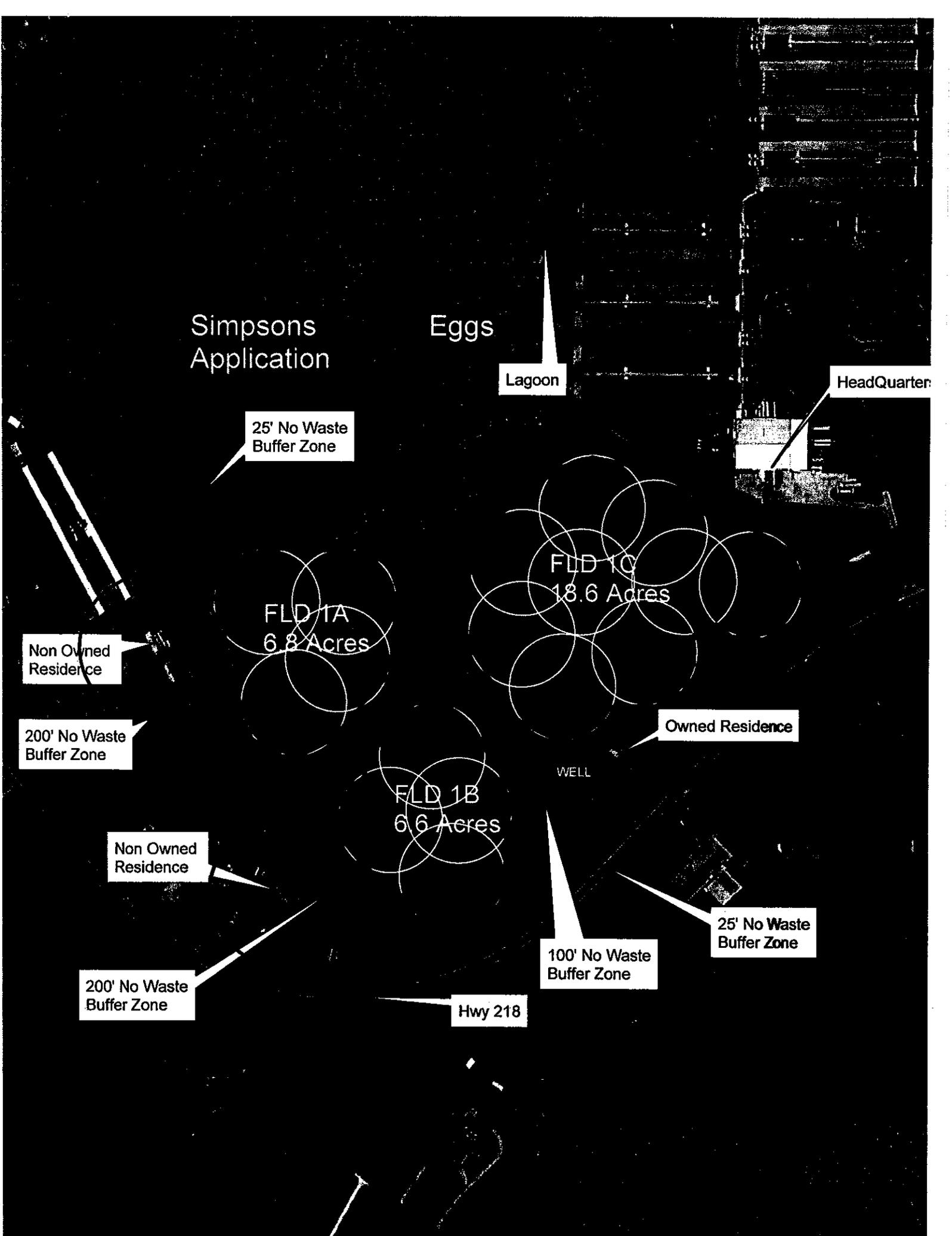
Non Owned
Residence

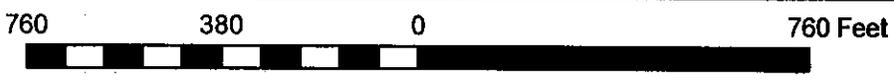
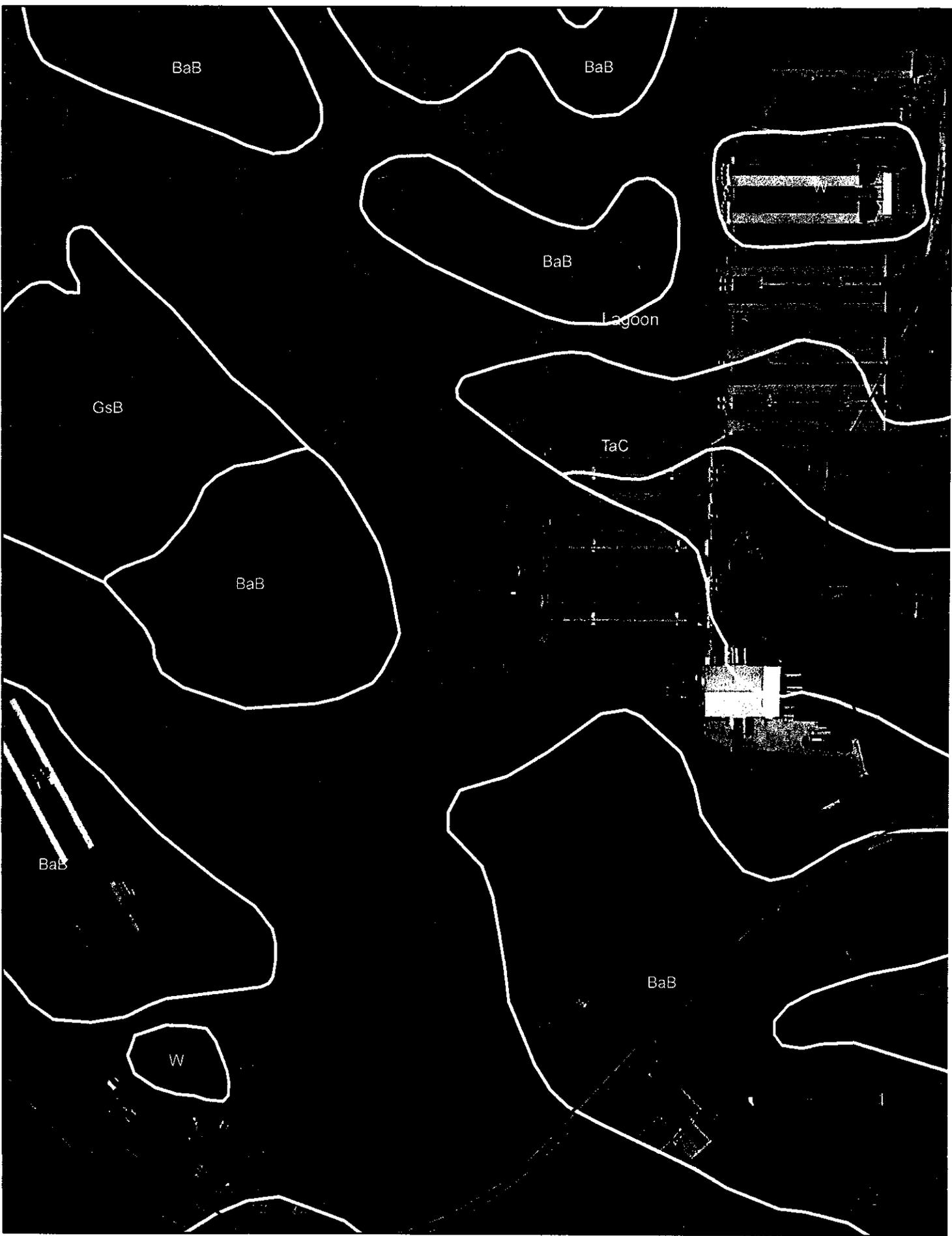
25' No Waste
Buffer Zone

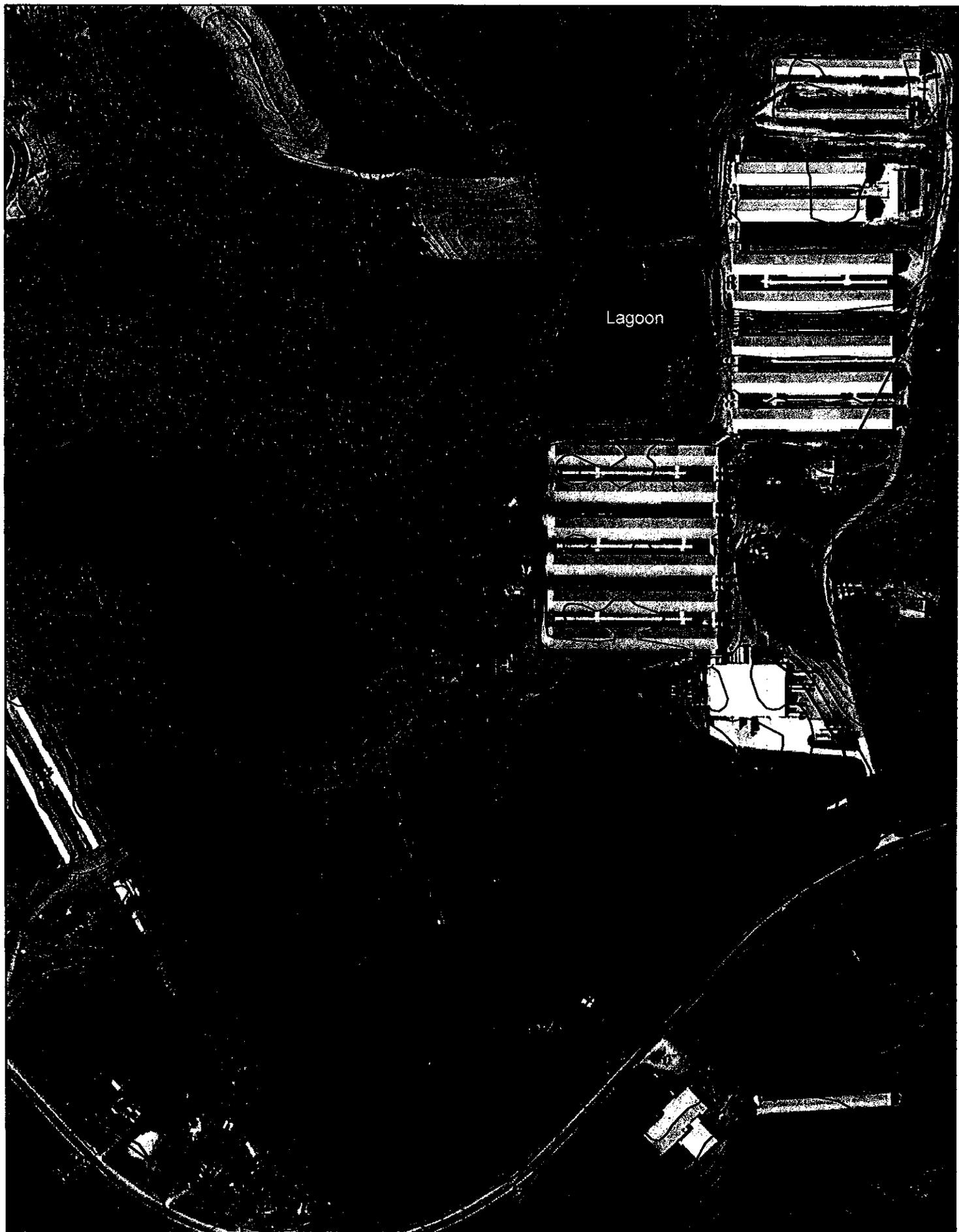
200' No Waste
Buffer Zone

100' No Waste
Buffer Zone

Hwy 218







Lagoon

760

380

0

760 Feet



VOLUME TO BE REMOVED

Length (Top)
Width (Top)
Total Depth
Side Slopes
Liquid Depth (ft)
Sludge Depth (ft)
Freeboard (ft)

400.00
 400.00
 38.00
 3.00
 3.00
 2.00

Note: Enter back-slope # for side slopes

Example: 1:1 = 1:1 slope, back-slope = 1

	<u>Length</u>	<u>Width</u>
Lagoon Dims. @ Liquid Level	392.00	392.00
Lagoon Dims. @ Sludge Level	380.00	380.00
Lagoon Dims. @ Bottom	368.00	368.00

	<u>Cubic Feet</u>	<u>Gallons</u>
Liquid Depth	447024.00	3343739.52
Sludge Depth	419664.00	3139086.72
Total	866688.00	6482826.24

EXISTING LAGOON

WASTE INLET PIPE

Top of Ben
 PRELIMINARY
 DESIGN STUDY
 STORMWATER STORAGE

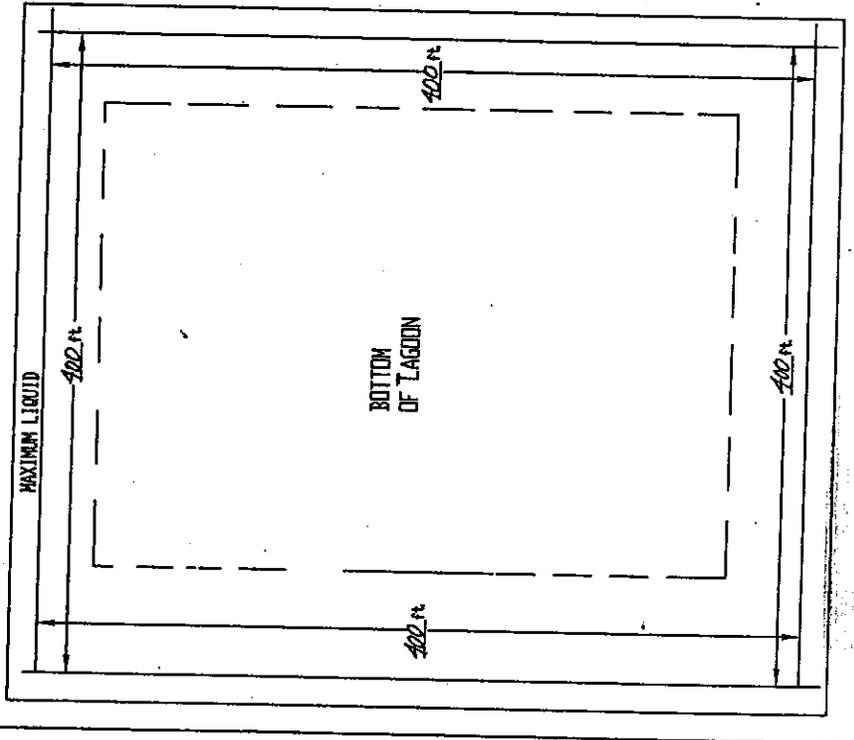
1'P
 1'P

PLANNED FRESH WATER LEVEL

3,343,740 GALLONS EXISTING WASTEWATER CAPACITY
 (1,248,000 GALLONS WASHWATER PRODUCED ANNUALLY)

3,139,086 GALLONS EXISTING SLUDGE CAPACITY

TOTAL LAGOON LIQUID VOLUME: 3343740 Gallons
 TOTAL LAGOON SLUDGE VOLUME: 3,139,086 Gallons
 WASHWATER PRODUCED ANNUALLY: 1,248,000 Gallons
 DISPOSAL FIELD LOCATIONS: (See Attached Maps)



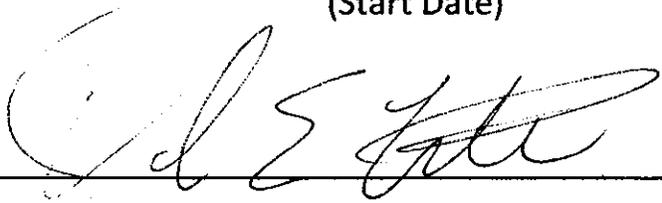
SIMPSON'S EGGS LAGOON DETAILS
 USDA - NATURAL RESOURCES
 CONSERVATION SERVICE

Simpson's Eggs, Inc.

Litter Agreement

I Dale Little (Full Name), of Dale Little Farms (Farm Name), do hereby agree to remove and dispose of a portion of the dry litter produced by Simpson's Eggs, Inc. This litter consist of the waste of approximately 1,100,000 layer hens and 320,000 pullets and will total approximately 32,000 tons annually. I agree to apply the waste in an agronomic manner as required by the State of North Carolina. I understand it is my responsibility to maintain adequate land to apply the waste at a rate that is appropriate as determined by soil and waste sampling. This agreement will be in effect as outlined below.

Term of Agreement 1/1/12 to 12/31/17
(Start Date) (End Date)

 1-3-12
(Farmer's Signature) (Date)

 1/3/12
(Waste Producer's Signature) (Date)

Simpson's Eggs, Inc.

Litter Agreement

I Alex Simpson (Full Name), of Triple S Cattle, LLC (Farm Name), do hereby agree to remove and dispose of a portion of the dry litter produced by Simpson's Eggs, Inc. This litter consist of the waste of approximately 1,100,000 layer hens and 320,000 pullets and will total approximately 32,000 tons annually. I agree to apply the waste in an agronomic manner as required by the State of North Carolina. I understand it is my responsibility to maintain adequate land to apply the waste at a rate that is appropriate as determined by soil and waste sampling. This agreement will be in effect as outlined below.

Term of Agreement 1/1/12 to 12/31/17
(Start Date) (End Date)

[Signature]
(Farmer's Signature) 1/1/12
(Date)

[Signature]
(Waste Producer's Signature) 1/1/12
(Date)

Simpson's Eggs, Inc.

Litter Agreement

I Everette Medlin (Full Name), of Medlin Farms (Farm Name), do hereby agree to remove and dispose of a portion of the dry litter produced by Simpson's Eggs, Inc. This litter consist of the waste of approximately 1,100,000 layer hens and 320,000 pullets and will total approximately 32,000 tons annually. I agree to apply the waste in an agronomic manner as required by the State of North Carolina. I understand it is my responsibility to maintain adequate land to apply the waste at a rate that is appropriate as determined by soil and waste sampling. This agreement will be in effect as outlined below.

Term of Agreement 1/1/12 to 12/31/17
(Start Date) (End Date)

Everette Medlin - Medlin Farms 5-9-12
(Farmer's Signature) (Date)

[Signature] 1/3/12
(Waste Producer's Signature) (Date)

Simpson's Eggs, Inc.

5015 Hwy. 218 E. Monroe, NC 28110 *Quality Eggs Produced & Packed Daily* (800) 726-1330 Fax: (704) 753-4762

Fax Cover Sheet:

RECEIVED/DENR/DWQ

MAY 30 2012

Aquifer Protection Section

To: Rick Pegg
From: Richard Simpson
Date: 9/2/12
Time: _____
Pages: 2

Comments:

Rick,

Sorry for being late!

Wastewater is listed 1st and the
lagoon water is listed 2nd

The gallons is approx. 1.25 million gallon/year

104, thousand gallon/month

3,450 gallon/day

If you need more information or have any
question call me (704/221-4676)

Thank you,
Richard Simpson

STORAGE POND

WASTE INLET PIPE

Top of Inlet Elev. 82.0

10 ft. Freeboard
 Crest of Encroachment
 25yr/24hr. Storm Event
 Heavy Rainfall Event (5yr/24hr)
 Precipitation Loss Evaporation

1.0
 0.9
 0.7
 0.9
 0.7

3.0 ft.

Max. Start Pump Elev. 88.0

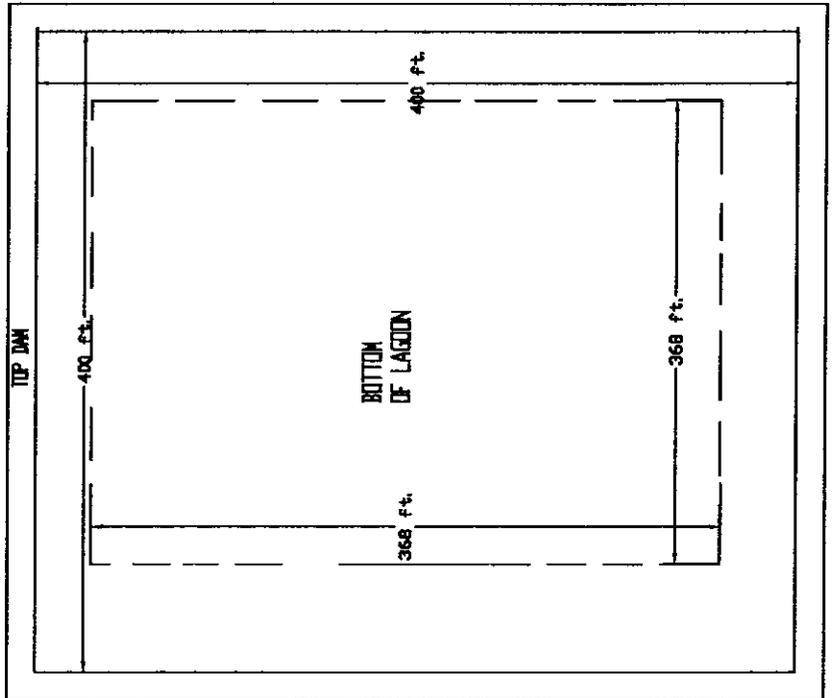
5,236,984 GALLONS EXISTING WASTEWATER CAPACITY
 1,248,000 GALLONS WASHWATER PRODUCED ANNUALLY
 (Maximum of 50 months storage)

4.9 ft.

Site Pump Elev. 84.1

OPERATION AND MAINTENANCE OF WASTE STORAGE POND

The storage pond will receive the waste from the wash water of the existing poultry egg production packing room, all other waste produced on farm will be dry litter. All waste will be land applied according to the attached waste utilization plan. A highly visible marker will be placed to indicate the maximum storage level of the liquid. Operator will be responsible for anticipating the needed timing of application to prevent encroachment into the storm water volume zones. Storage pond may be pumped partially or completely as need to utilize the existing waste contained. Waste will be agitated prior to pumping to facilitate a homogenous mix and to prevent the buildup of sludge due to settling. Operator will keep all records on the analysis and volumes of waste removed from the storage pond. All samples will be taken in accordance with NC State law and as indicated on the attached Waste Utilization plan. Operator will periodically inspect the dam for muskrat holes and other dam safety problems. Dam will be mowed regularly to encourage adequate ground level vegetation and to prevent canopying of woody vegetation. Dam will be kept free on woody vegetation such as trees and shrubs. Waste samples will be taken and analyzed prior to application as described in waste utilization plan.



SIMPSON'S EGGS STORAGE POND

USDA - NATURAL RESOURCES CONSERVATION SERVICE

EMERGENCY ACTION PLAN

PHONE NUMBERS

DWQ 704-663-1699
EMERGENCY MANAGEMENT SYSTEM 919-733-3867
SWCD 704-233-1621
NRCS 704-233-1621

This plan will be implemented in the event that wastes from your operation are leaking, overflowing, or running off site. You should not wait until wastes reach surface waters or leave your property to consider that you have a problem. You should make every effort to ensure that this does not happen. This plan should be posted in an accessible location for all employees at the facility. The following are some action items you should take.

1. Stop the release of wastes. Depending on the situation, this may or may not be possible. Suggested responses to some possible problems are listed below.

A. Lagoon overflow-possible solutions are:

- a. Add soil to berm to increase elevation of dam.
- b. Pump wastes to fields at an acceptable rate.
- c. Stop all flows to the lagoon immediately.
- d. Call a pumping contractor.
- e. Make sure no surface water is entering lagoon.

B. Runoff from waste application field-actions include:

- a. Immediately stop waste application.
- b. Create a temporary diversion to contain waste.
- c. Incorporate waste to reduce runoff.
- d. Evaluate and eliminate the reason(s) that caused the runoff.
- e. Evaluate the application rates for the fields where runoff occurred.

C. Leakage from the waste pipes and sprinklers-action include:

- a. Stop recycle pump.
- b. Stop irrigation pump.
- c. Close valves to eliminate further discharge.
- d. Repair all leaks prior to restarting pumps.

D. Leakage from flush systems, houses, solid separators-action include:

- a. Stop recycle pump.
- b. Stop irrigation pump.
- c. Make sure no siphon occurs.
- d. Stop all flows in the house, flush systems, or solid separators.
- e. Repair all leaks prior to restarting pumps.

E. Leakage from base or sidewall of lagoon. Often this is seepage as opposed to

- a. Dig a small sump or ditch away from the embankment to catch all seepage, put in a submersible pump, and pump back to the lagoon.
- b. If holes are caused by burrowing animals, trap or remove animals and fill holes and compact with a clay type soil.
- c. Have a professional evaluate the condition of the side walls and lagoon bottom as soon as possible.

2. Assess the extent of the spill and note any obvious damages.

- a. Did the waste reach any surface waters?
- b. Approximately how much was released and for what duration?
- c. Any damage noted, such as employee injury, fish kills, or property damage?
- d. Did the spill leave the property?
- e. Does the spill have the potential to reach surface waters?
- f. Could a future rain event cause the spill to reach surface waters?
- g. Are potable water wells in danger (either on or off of the property)?
- h. How much reached surface waters?

3. Contact appropriate agencies.

- a. During normal business hours, call your DWQ (Division of Water Quality) regional office; Phone - - -. After hours, emergency number: 919-733-3942. Your phone call should include: your name, facility, telephone number, the details of the incident from item 2 above, the exact location of the facility, the location or direction of movement of the spill, weather and wind conditions. The corrective measures that have been under taken, and the seriousness of the situation.
- b. If spill leaves property or enters surface waters, call local EMS phone number - - -
- c. Instruct EMS to contact local Health Department.
- d. Contact CES, phone number - - -, local SWCD office phone number - - -, and local NRCS office for advice/technical assistance phone number - - -.

4. If none of the above works call 911 or the Sheriff's Department and explain your problem to them and ask that person to contact the proper agencies for you.

5. Contact the contractor of your choice to begin repair of problem to minimize off-site

damage.

- a. Contractors Name: _____
- b. Contractors Address: _____
- c. Contractors Phone: _____

6. Contact the technical specialist who certified the lagoon (NRCS, Consulting Engineer, etc.

- a. Name: _____
- b. Phone: _____

7. Implement procedures as advised by DWQ and technical assistance agencies to rectify the damage, repair the system, and reassess the waste management plan to keep problems with release of wastes from happening again.

Insect Control Checklist for Animal Operations

Source	Cause	BMPs to Minimize Insects	Site Specific Practices
Liquid Systems			
Flush Gutters	● Accumulation of Solids	<input type="checkbox"/> Flush system is designed and operated sufficiently to remove accumulated solids from gutters as designed;	N/A
		<input type="checkbox"/> Remove bridging of accumulated solids at discharge	
Lagoons and Pits	● Crusted Solids	<input checked="" type="checkbox"/> Maintain lagoons, settling basins and pits where pest breeding is apparent to minimize the crusting of solids to a depth of no more than 6 - 8 inches over more than 30% of surface.	
		<input checked="" type="checkbox"/> Maintain vegetative control along banks of lagoons and other impoundments to prevent accumulation of decaying vegetative matter along water's edge on impoundment's perimeter.	
Dry Systems			
Feeders	● Feed Spillage	<input checked="" type="checkbox"/> Design, operate and maintain feed systems (e.g., bunkers and troughs) to minimize the accumulation of decaying wastage.	
		<input checked="" type="checkbox"/> Clean up spillage on a routine basis (e.g., 7 - 10 day interval during summer; 15-30 day interval during winter).	
Feed Storage	● Accumulation of feed residues	<input type="checkbox"/> Reduce moisture accumulation within and around immediate perimeter of feed storage areas by insuring drainage away from site and/or providing adequate containment (e.g., covered bin for brewer's grain and similar high moisture grain products).	N/A
		<input type="checkbox"/> Inspect for and remove or break up accumulated solids in filter strips around feed storage as needed.	
Animal Holding Areas	● Accumulations of animal wastes and feed wastage	<input checked="" type="checkbox"/> Eliminate low areas that trap moisture along fences and other locations where waste accumulates and disturbance by animals is minimal.	
		<input type="checkbox"/> Maintain fence rows and filter strips around animal holding areas to minimize accumulations of wastes (i.e. inspect for and remove or break up accumulated solids as needed).	

Source	Cause	BMPs to Minimize Insects	Site Specific Practices
Dry Manure Handling Systems	● Accumulations of animal wastes	<input type="checkbox"/> Remove spillage on a routine basis (e.g., 7-10 day interval during summer; 15-30 day interval during winter) where manure is loaded for land application or disposal. <input checked="" type="checkbox"/> Provide fo adequate drainage around manure stockpiles. <input checked="" type="checkbox"/> Inspect for an remove or break up accumulated wastes in filter strips around stockpiles and manure handling areas as needed.	

For more information contact the Cooperative Extension Service, Department of Entomology, Box 7613, North Carolina State University, Raleigh, NC 27695-7613

Poultry Layer Farm Waste Management Odor Control Checklist

Source	Cause	BMPs to Minimize Odor	Site Specific Practices
Farmstead	● Poultry Production	<input type="checkbox"/> Vegetative or wooded buffers;	
		<input checked="" type="checkbox"/> Recommended best management practices;	
		<input checked="" type="checkbox"/> Good judgement and common sense	
Floor surfaces (walk aisles)	● Wet dirty surfaces	<input checked="" type="checkbox"/> Scrape manure, dust, feathers into collection alleys;	
		<input checked="" type="checkbox"/> Splash boards along upper ends of collection alleys;	
		<input checked="" type="checkbox"/> Proper ventilation	
Cage manure dropping boards	● Manure-covered surface	<input checked="" type="checkbox"/> Scrape manure into collection alleys	
Manure collection alleys	● Partial microbial decomposition	<input checked="" type="checkbox"/> Frequent manure removal by flush or scrape;	
		<input checked="" type="checkbox"/> Frequent checks and maintenance on waterers and water pipes	
Ventilation exhaust fans	● Volatile gases;	<input checked="" type="checkbox"/> Fan maintenance;	
	● Dust	<input checked="" type="checkbox"/> Efficient air movement	
	● Dust	<input checked="" type="checkbox"/> Vacuum or washdown between flocks;	
Manure conveyors	● Partial microbial decomposition	<input type="checkbox"/> Keep mechanical equipment in good repair;	N/A
		<input type="checkbox"/> Remove manure accumulations promptly	
Storage tank or basin surface	● Partial microbial decomposition;	<input type="checkbox"/> Bottom or midlevel loading;	
		<input type="checkbox"/> Tank covers;	N/A
		<input type="checkbox"/> Basin surface mats of solids;	
		<input type="checkbox"/> Proven biological additives or oxidants	
Manure slurry or sludge spreader outlets	● Agitation when spreading;	<input type="checkbox"/> Soil injection of slurry/sludges;	N/A
	● Volatile gas emissions	<input type="checkbox"/> Wash residual manure from spreader after use;	
		<input type="checkbox"/> Proven biological additives or oxidants	
Uncovered manure slurry or sludge on field surfaces	● Volatile gas emissions while drying	<input type="checkbox"/> Soil injection of slurry/sludges;	N/A
		<input type="checkbox"/> Soil incorporation within 48 hrs.	
Outside drain collection or junction boxes	● Agitation during wastewater conveyance	<input checked="" type="checkbox"/> Box covers	

Site Specific Practices

BMPs to Minimize Odor

Cause

Source

N/A

Source	Cause	BMPs to Minimize Odor	Site Specific Practices
Lift stations	<ul style="list-style-type: none"> ● Agitation during sump tank filling and drawdown 	<input type="checkbox"/> Sump tank covers	N/A
End of drainpipes at lagoon	<ul style="list-style-type: none"> ● Agitation during wastewater conveyance 	<input type="checkbox"/> Extend discharge point of pipes underneath lagoon liquid level	
Lagoon surfaces	<ul style="list-style-type: none"> ● Volatile gas emission; ● Biological mixing; ● Agitation 	<input type="checkbox"/> Proper lagoon liquid capacity; <input type="checkbox"/> Correct lagoon startup procedures; <input type="checkbox"/> Minimum surface area-to-volume ratio; <input type="checkbox"/> Minimum agitation while pumping; <input type="checkbox"/> Mechanical aeration; <input type="checkbox"/> Proven biological additives	
Irrigation sprinkler nozzles	<ul style="list-style-type: none"> ● High pressure agitation; ● Wind drift 	<input checked="" type="checkbox"/> Irrigate on dry days with little or no wind; <input type="checkbox"/> Minimum recommended operating procedure; <input type="checkbox"/> Pump intake near lagoon liquid surface; <input type="checkbox"/> Pump from second-stage lagoon	
Dead birds	<ul style="list-style-type: none"> ● Carcass decomposition 	<input checked="" type="checkbox"/> Proper disposition of carcasses	
Dead bird disposal pits	<ul style="list-style-type: none"> ● Carcass decomposition 	<input type="checkbox"/> Complete covering of carcasses in burial pits; <input type="checkbox"/> Proper location/construction of disposal pits; <input type="checkbox"/> Disposal pit covers tight fitting	N/A
Standing water around facilities	<ul style="list-style-type: none"> ● Improper drainage ● Microbial decomposition of organic matter 	<input checked="" type="checkbox"/> Grade and landscape such that water drains away from facilities	
Mud tracked onto public roads from farm access	<ul style="list-style-type: none"> ● Poorly maintained access roads 	<input type="checkbox"/> Farm access road maintenance	

Additional Information:

Available From:

Source	Cause	BMPs to Minimize Odor	Site Specific Practices
Poultry Manure Management; .0200 Rule/BMP Packet	Poultry Layer Production Facility Manure Management: High Rise, Deep Pit; EBAE 131-88	Poultry Layer Production Facility Manure Management: Undercage Flush - Lagoon Treatment; EBAE 130-88	NCSU, County Extension Center
Lagoon Design and Management for Livestock Manure Treatment and Storage; EBAE 103-83	Calibration of Manure and Wastewater Application Equipment; EBAE Fact Sheet	Proper Disposal of Dead Poultry; PS&T Guide No. 19	NCSU - BAE
Nuisance Concerns in Animal Manure Management: Odors and Flies; PRO107, 1995 Conference Proceedings			NCSU - BAE
			NCSU - BAE
			NCSU - BAE
			NCSU - Poultry Science
			Florida Cooperative Extension

Mortality Management Methods
(check which method(s) are being implemented)

- Burial three feet beneath the surface of the ground within 24 hours after knowledge of the death. The burial must be at least 300 feet from any flowing stream or public body of water.
- Rendering at a rendering plant licensed under G.S. 106-168.7.
- Complete incineration
- In the case of dead poultry only, placing in a disposal pit of a size and design approved by the Department of Agriculture.
- Any method which in the professional opinion of the State Veterinarian would make possible the salvage of part of a dead animal's value without endangering human or animal health. (Written approval of the State Veterinarian must be attached)

December 18, 1996