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LIVESTOCK ENVIRONMENTAL PERMITTING PROGRAM



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FOR IMMEDIATE RELEASE

November 5, 2003

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FACT SHEET: Ohio Fresh Eggs **Draft Permits to Install and Draft Permits to Operate for Croton Egg Farm**

General overview of the farm

Ohio Fresh Eggs has been issued four draft Permits to Install and nine draft Permits to Operate for the current Buckeye Egg Farm facilities located in Licking County, Hartford, Monroe, and Bennington townships. The business address is 11212 Croton Road in Croton. Ohio Fresh Eggs is owned and operated by Ohio Ag Investors LLC, which is owned by Don Hershey and by Hillandale Farms LLC, which is owned by Orland Bethel.

The total facilities include four layer sites, four pullet sites, and a hatchery and breeder pullet site. The four layer sites have 64 barns. The previous owner agreed in March 2001 to a Consent Order limiting capacity to 5.6 million laying hens, or 56,000 animal units. However, because renovations were not completed as also required by the Consent Order, the layer farms currently have only 45 barns open housing 3,717,806 million laying hens. Ohio Fresh Eggs plans to complete proposed remodeling, and their draft permits would allow them to stock up to 5.6 million laying hens.

There are four pullet sites at Croton Egg Farm with 21 barns, of which 11 are currently open. Closed barns have not undergone court-ordered renovations. The pullet site currently houses 1,096,000 pullets. The hatchery consists of five laying barns with 118,250 birds. The breeder pullet site consists of two buildings that house a total of 50,000 birds.

The Croton Egg Farm is located in several watersheds. Pullet sites 1 and 2 and Layer site 1 are located in the Otter Fork of North Fork of the Licking River; Layer site 2 is located at the Headwaters of Raccoon Creek; Layer site 3 is located at the East Fork of Rattlesnake Creek to Big Walnut; Layer site 4 is located at the Headwaters of Raccoon Creek; Pullet sites 3 and 4 are located in the Lobdell Creek watershed; and the hatchery and breeder pullet site is located in Bowl Run to Otter Fork of North Fork of the Licking River.

Overview of the Layer Sites

There are four layer sites at Ohio Fresh Egg's Croton Egg Farm, each with 16 barns. All barns measure 530 feet long by 52 feet wide. Currently, the farm has a combination of high-rise barns (where manure is stored below the birds), high-rise barns with pit fans (to circulate air around the manure to help the drying process), belt battery barns (where manure is conveyed to a separate storage structure or building), and empty barns. All high-rise barns have 72,576 birds per house, and the high-rise barns with pit fans have 102,850 birds per house. The remodeled belt battery barns currently house 107,533 birds.

Layer site 1 has eight high-rise barns and two high-rise barns with pit fans in operation. Layer site 1 has six empty barns. Layer site 2 has nine high-rise barns and two high-rise barns with pit fans in operation. Layer site 2 also has five empty barns. Layer site 3 has ten high-rise barns and two high-rise barns with pit fans in operation. There are also four empty barns at Layer site 3. (As described in the permit to operate, Ohio Fresh Eggs plans to place pit fans in nine of the high-rise barns at Layer site 3 this year until those barns are converted to belt battery barns or emptied in 2006.) Layer site 4 currently has six barns that have been remodeled to seven-tier belt battery

systems that are 332 feet long with 160 feet of manure storage in the end of the building. Layer site 4 also has four high-rise barns and two high-rise barns with pit fans in operation. Layer site 4 currently has four empty barns.

Ten layer barns at Layer sites 1-3 would be remodeled to belt battery barns on a rotating schedule. Layer site 4 would have five barns remodeled, because six barns at that site are already remodeled to belt battery systems. In a belt battery system, the hens are housed in wire cages stacked from floor to ceiling and manure is deposited on belts below each cage row. The manure would be dried on the belts as air is forced over them, and manure would be removed to two separate manure storage buildings that would be built at each layer site. The total number of birds at the farm would not increase to more than 5.68 million birds, as required by a Consent Order signed in March 2001 and required in their draft permits. Ohio Fresh Eggs proposes that the remodeling at Layer site 1 and 4 would be completed in 2004, Layer site 2 would be completed in 2005, and Layer site 3 would be completed in 2006.

Draft Permits to Install

The two new manure storage buildings at each layer site are outlined in each of the draft Permits to Install. They are 100 feet wide by 325 feet long with concrete walls 10 feet high. Manure from the belt battery barns would be conveyed to the manure storage buildings and stored in three piles throughout the building. The buildings would be naturally ventilated.

Draft Permits to Operate – Manure Management Plan

Ohio Fresh Eggs has also been issued four draft Permits to Operate for the four layer farms. These permits are drafted to regulate operations with plans for manure management, insect and rodent control, mortality management, and emergency response. They would be valid for a five-year period, at which time the owner would be required to renew the operating permit.

Each farm has 16 barns in varying stages of operation as described above. The high-rise barns have approximately two years manure storage. The high-rise barns with pit fans have approximately 16 months of manure storage. The existing belt battery houses at Layer 4 have manure storage in the ends of the buildings and have approximately 7 months of storage. The new manure storage barns that would be constructed would allow for 1 year of manure storage at each site. Upon completion of the new manure storage buildings, the manure from the newly remodeled belt battery buildings would be transferred to the storage building via conveyor. Currently, between 5,000 and 10,000 dry tons of manure are produced at each layer site. Approximately 12,000 dry tons of manure would be produced at each layer site after conversion to belt battery. The manure tonnage estimates for the high-rise barns were obtained from published data from OSU Extension and the belt battery barn estimates were obtained from a similar type facility.

All of the solid manure from the Croton Layer facilities would be sold to local farmers and land applied by contract applicators. The estimated manure nutrient analysis for this farm was calculated based on manure samples from the facility. The solid manure nutrient analysis utilized for the Croton layer sites is as follows:

Total N per dry ton manure = 102 lbs.

P₂O₅ per dry ton of manure = 96.2 lbs.

K₂O per dry ton of manure = 49.7lbs.

The estimated eggwash/stormwater nutrient analysis for this farm was calculated based on samples from the facility. The eggwash/stormwater analysis utilized for the Croton layer sites is as follows:

Total N per 1,000 gallons = 0.143 lbs.

P₂O₅ per 1,000 gallons = 0.0409 lbs.

The layer sites all generate approximately 30,000,000 gallons a year of eggwash/stormwater, which would be disposed of primarily through center pivot irrigation and dragline irrigation to other land.

Overview of the Pullet Sites

There are four pullet sites at Ohio Fresh Egg's Croton Egg Farm, with a total of 21 barns and 1,096,000 pullets. Pullet sites 1, 3, and 4 have five barns each measuring 392 feet long by 52 feet wide. Pullet site 2 has six barns measuring 392 feet long by 52 feet wide. Of the 21 barns, 11 are currently in operation. All high-rise barns house 86,000 pullets, and belt battery barns hold 150,000 pullets.

Pullet site 1 has one barn in operation. It is a remodeled belt battery barn, with manure stored in the end of the building. All of the other barns are closed; they are the high-rise barns. Pullet site 2 has three high-rise barns in

operation and three high-rise barns empty. Pullet site 3 has three high-rise barns in operation and two high-rise empty. Pullet site 4 has five high-rise barns in operation.

According to Ohio Fresh Eggs' plans, by 2006, 16 of the 21 pullet barns would be remodeled on a rotating schedule to belt battery systems. All barns at Pullet sites 1 and 2 would be converted to belt battery and fully operational. Pullet site 3 would have five barns converted, but only one in operation. Because all converted pullet houses would house 150,000 pullets each, by 2006 there would be a total of 1.8 million birds at Pullet sites 1-3. This is below the maximum number of pullets as required by a Consent Order signed in March 2001. However, Pullet site 4 would be fully renovated in 2007 but left empty to meet the requirements of the Consent Order.

Permits to Operate – Manure Management Plan

Ohio Fresh Eggs has also been issued four draft Permits to Operate for the four pullet farms. These permits are drafted to regulate operations with plans for manure management, insect and rodent control, mortality management, and emergency response. They would be valid for a five-year period, at which time the owner would be required to renew the operating permit.

The estimated manure nutrient analysis for the pullet sites was calculated based on manure samples from the facility. The solid manure nutrient analysis utilized for the pullet sites is as follows:

Total N per dry ton manure = 91.4 lbs.

P₂O₅ per dry ton of manure = 122 lbs.

K₂O per dry ton of manure = 71.8 lbs.

Approximately 1,400 dry tons of manure is currently generated at the pullet sites. All of the manure would be sold to local farmers and land applied by contract applicators.

The estimated stormwater analysis for this farm was calculated based on water samples from the facility. The stormwater analysis used is as follows:

Total N per 1,000 gallons = 0.0984 lbs.

P₂O₅ per 1,000 gallons = 0.0561 lbs.

The four pullet sites generate approximately 4.6 million gallons a year at each site, which would be disposed of primarily through center pivot irrigation and dragline irrigation to other land.

Overview of the Hatchery and Breeder Pullet Site

There is a hatchery and breeder pullet site at Ohio Fresh Egg's Croton Egg Farm. The hatchery site has five laying hen barns measuring 488 feet long by 40 feet wide with 23,650 birds each. All five barns are high-rise barns with manure stored in deep pits under the open slatted floors. The breeder site has two, two-story solid floor barns measuring 250 feet long by 40 feet wide containing 25,000 birds each. Wood shavings are used for bedding, and the buildings are cleaned and bedding and manure removed every 18 weeks as pullets are moved into the hatchery barns.

Permits to Operate – Manure Management Plan

Ohio Fresh Eggs has also been issued a draft Permit to Operate for the hatchery and breeder site. This permit is drafted to regulate operations with plans for manure management, insect and rodent control, mortality management, and emergency response. They would be valid for a five-year period, at which time the owner would be required to renew the operating permit.

The estimated manure nutrient analysis for this farm was calculated based on manure samples from the facility. The solid manure nutrient analysis utilized for the hatchery and breeder pullet site is as follows:

Total N per dry ton manure = 94.4 lbs.

P₂O₅ per dry ton of manure = 91.6 lbs.

K₂O per dry ton of manure = 48.6 lbs.

Approximately 167 dry tons of manure is generated at the breeder pullet site and about 1,000 dry tons of manure is generated at the hatchery site. All of the manure from the facility would be sold to local farmers and land applied by contract applicators. Broken eggshells are collected by vacuum to a tank for pick-up and rendering.

The estimated manure nutrient analysis for this farm was calculated based on wastewater samples from the facility. The wastewater nutrient analysis utilized for the hatchery and breeder pullet site is as follows:

Total N per 1,000 gallons = 0.51 lbs.

P₂O₅ per 1,000 gallons = .0267 lbs.

The hatchery and breeder pullet site generates approximately 10 million gallons of wastewater a year, which would be disposed of primarily through center pivot irrigation and dragline irrigation to other land.

Draft Permits to Operate (continued) – all sites

Ohio Fresh Eggs would keep land application records for all wastewater applications and would keep distribution and utilization records for land applied manure. Because Ohio Fresh Eggs is a Major Concentrated Feeding Facility (having more than 10,000 animal units), they are required by Ohio law to have a Certified Livestock Manager, and they do have one on staff. Any contract applicators used by Ohio Fresh Eggs who applies more than 4,500 dry tons of manure per year would also be required to become Certified Livestock Managers through the Livestock Environmental Permitting Program and would be responsible for proper land application and maintaining records of manure that they apply.

The Insect and Rodent Control Plan is required as part of each draft Permit to Operate to minimize the presence and negative effects of insects and rodents. The Ohio Fresh Eggs Insect and Rodent Control Plans include checking and repairing feed systems daily; checking, repairing, and recording water leaks daily; immediately cleaning any spilled manure during removal; and keeping buildings and manure dry. Flies and fly larvae are monitored daily. Flies and fly larvae are also monitored two times per week by either the farm manager, compliance officer, and/or upper management using an insect ranking system developed by the Ohio Department of Health. Actions are taken based on fly and fly larvae levels. Flyspeck cards are also used with actions taken when one card has more than 50 specks. Control of vectors (such as flies and beetles) at the application site will be the responsibility of Ohio Fresh Eggs.

Fly control should become easier as barns are renovated to belt battery systems. Manure would be dried on belts and held in a storage separate storage structure or building apart from flock housing. The manure storage structures would not be exposed to water leaks or spilled feed and would not rely on beneficial insects to help control flies. Fly control would be achieved by running the belts approximately 100 feet (20 percent) per day, allowing for drying of manure via forced air and conveyor transfer to storage. When the manure is in storage, additional insect control would be gained from the piles via self-heating. Chemical sprays would be used in the manure storage area if necessary.

For rodents, bait stations would be placed along the perimeter of the barns and checked weekly. Bait is replaced as needed. Bait packages are used both in the pits and upstairs in the chicken housing area at least every two weeks. The facility is inspected daily for rodent activity, spilled feed is cleaned up daily, and grass around barns is mowed as needed. The Insect and Rodent Control Plan was developed based on requirements in the Consent Order from March 2001.

A Mortality Management Plan is required for the disposal of dead chickens. Approved methods for disposal are burying, burning, rendering, or composting. At the Croton facilities, the barns are walked daily, and dead birds are collected. They are then placed in barrels and picked up at least every other day in a refrigerated truck and taken to rendering. A landfill would be used as a backup plan.

Finally, an Emergency Response Plan is required to ensure accidents or emergencies are handled quickly and efficiently to maintain the safety of the environment, wildlife, and water supplies. Any manure spills would be stopped, contained, and cleaned up immediately. In case of a manure spill, equipment and prearranged emergency response agreements are in place. In case of a fire, there is a fire emergency response information sheet to assist farm personnel in contacting local fire protection districts.