



## Iowa Department of Natural Resources AFO Desk-top Assessment Standard Operating Procedure

Following is the standard operating procedure (SOP) intended to provide guidance for Iowa DNR field staff in conducting desk-top assessments of medium-sized AFOs and large CAFOs.

### **Purpose**

A primary purpose of the desk-top assessment will be to determine whether an on-site inspection is necessary. Classifying a facility as not needing an on-site inspection means that the desk-top assessment conducted pursuant to this SOP is sufficient to support a determination that the AFO does not discharge to a water of the U.S. Also, the desk-top assessment will establish and document baseline conditions at the facility.

### **Procedure**

A desk-top assessment will consist of a review of all relevant currently available information about the facility to assess site-specific risk factors relevant to determining the likelihood of a discharge to a water of the U.S.

1. Gather available information. Sources of information that should be considered include, but are not limited to:

- AFO siting atlas
- Facility file, including permits, facility reports, citizen complaints, prior inspection reports, manure management plan, etc.
- Field Office Compliance database
- Animal Feeding Operation (AFO) database
- Manure management plan
- Public mapping information

2. Document baseline conditions at facility

- Print the map or image for file reference
- Note facility type (confinement, open lot, or combined)
- Note number of buildings/pens housing animals
- Note number of manure storage facilities, including the type for each
- Note geographical and topographical features including, but not limited to, surface waters, potential conduits or flow paths to surface waters, neighboring or adjacent facilities, and any other relevant information

- Known discharges to a water of the U.S. within the past 5 years, and information about measures taken to permanently remedy the conditions that gave rise to the discharge, evaluated according to the relevant criteria in the Comprehensive Survey SOP
- Known releases, including information about the pollutant concentration and volume of the release and whether the release posed a threat of discharging pollutants to a water of the U.S.
- Complaint investigations
- Whether an on-site inspection by Iowa DNR at the facility after November 1, 2011, enables Iowa DNR to determine the facility does not discharge to a water of the U.S. The inspection must have been functionally equivalent to the on-site inspections to be conducted using the Open Feedlot and Confinement Facility (Non-NPDES) On-Site Inspection SOPs, including having written documentation of findings.

3. Assess and document key information and risk factors relevant to the likelihood that the facility discharges. Factors to be considered include but are not limited to:

- Animal types and numbers
- Manure storage system used (covered vs. uncovered)
- Systems and practices for managing feed, silage, compost, and mortalities
- Distance to a water of the U.S.
- Topography, including slope, presence of runoff flow paths, ditches, culverts or other conduits and drainage features that would convey manure to a water of the U.S., land cover and other notable features in runoff areas
- Proximity of tile line intake structures to production area if visible
- Compliance and spill/release history, including any steps the facility has taken to permanently remedy the cause of the discharge

4. Determine appropriate classification of facility on the Iowa DNR Animal Feeding Operation Regulatory Status Form.

5. Based upon the desk-top assessment, it will be noted that:

- This facility will receive an on-site inspection. or
- This facility will not receive an on-site inspection.