



## Iowa Department of Natural Resources Open Feedlot (non-NPDES) On-Site Inspection Standard Operating Procedure

### **Purpose**

The purpose of this Standard Operating Procedure (SOP) is to establish uniform procedures for conducting and reporting results of Clean Water Act compliance on-site inspections and compliance with the laws of the State of Iowa at large and medium open feedlot animal feeding operations that are operating **without** a National Pollutant Discharge Elimination System (NPDES) permit.

### **Pre-inspection Planning**

#### **A. File Review**

Utilizing available information from Iowa DNR facility file information, Iowa DNR databases and/or any mapping information that is readily available to the public, inspectors shall:

1. Review file information (if any) including correspondence, Notices of Violation (NOV), compliance schedules, site maps, complaints, spills, and any other pertinent information
2. Note facility capacity (if known), pen numbers, animals in a confinement feeding operation (if any)
3. Identify potential discharge flow paths, conduits, conveyances, tile intakes and outlets and other features of interest
4. Identify nearest water of the United States (U.S.)
5. Review Field Office Compliance Database (FOCD) for that facility

#### **B. Set Inspection Date**

1. Contact facility owner/manager one (1) to three (3) working days prior to the inspection
2. Request that the owner/manager have facility records available for inspection
3. State purpose and time needed for the inspection
4. Record contact information (date, time, person contacted)
5. Enter inspection date and time on inspector's Outlook calendar
6. Ask if there are any facility bio-security protocols (if not, explain you will follow Iowa DNR bio-security protocol)

### **Inspection Procedures**

#### **A. Materials/supplies needed**

1. Files
2. Site map/aerial and engineering drawing/plans if available
3. Pre-inspection notes
4. Sample bottles/cooler with ice packs, test kits (oxygen, pH, ammonia)

5. Notebook, camera, GPS device, copy of IAC rules, pens/pencils, boots/plastic booties

## **B. Facility Drive-by**

1. Document (observations, photographs, etc.) site topography, drainage, neighboring property, and/or any special areas of interest identified during pre-inspection planning
2. Locate/identify closest water of the U.S. in drainage area of potential feedlot runoff
3. Document any potential points of discharge of manure, litter or process wastewater

## **C. Pre-inspection meeting**

1. Present credentials (business card, state employee ID)
2. Introductions of all persons present during the inspection (include in record)
3. State purpose/scope of the inspection (facility record review, tour of facility, etc.)
4. Ask about facility capacity, maximum number of head confined at one time over the last 12 months, number of pens (make sure all head on-site and within 2500 feet are counted, including animals in a confinement feeding operation, and all other animal types)
5. Make sure site address and contact information (mailing address, phone numbers) are correct (include in record)

## **D. Facility Inspection**

1. Tour of facility including all pens, manure control and storage structures, clean water diversions, and any manure application equipment including pumps and irrigation units
2. If a discharge was noted during file review, document whether the conditions that gave rise to the discharge to a water of the U.S. at the facility have been changed or corrected such that the facility does not discharge to a water of the U.S. Please note in detail
3. Inspect manure control structures (if any) for integrity of berms, areas of erosion concern and freeboard (are structures being maintained, dewatered, and functioning as designed?)
4. Determine if runoff from production areas, including feed storage areas and stockpiles are contained
5. View areas downhill of feedlot to ascertain if there are any discharges to the surface of the ground, wells, sinkholes, tile line intakes, or waters of the U.S.
6. Determine if there are discharges of manure, litter or process wastewater from the facility into a water of the U.S. through a man-made ditch, flushing system, or similar man-made device
7. Determine if there are discharges of manure, litter or process wastewater into a water of the U.S. which originates outside of and passes over, across or through the facility or otherwise comes into contact with animals confined in the facility
8. Ask owner/manager about removal of settable solids, pen scraping, stockpiles, and dewatering schedule (if liquid manure is stored)
9. Review manure and process wastewater land application practices and all available land

application records

10. Observe any on-site or off-site stockpiles of manure or litter to determine if runoff discharges to a water of the U.S.
11. Record and document conditions and facilities
12. If discharges are observed or evidence is present that shows discharges have occurred in the past, document in detail, including photographs, and sample as appropriate
13. Take GPS coordinates at driveway entrance, if needed

#### **E. Exit Interview**

1. Review preliminary findings of inspection and provide a copy of inspection notes
2. Cover any violations or potential violations discovered during inspection or pre- inspection
3. Ask for any additional information not available but related to and needed for the inspection
4. Go over any requirements and recommendations based on the inspection
5. Explain the timeline for receiving a written report and copies of any samples taken
6. Ask owner/operator/manager if they have any questions

#### **F. Samples and other inspection information**

1. Fill out chain of custody form
2. Mail or hand deliver samples taken (if any)
3. Print and label all photos that were taken
4. Database update – Compare head numbers, animal types and housing type to database and update
5. Note and update facility name, addresses, contact information, etc., in AFO database

### **Post-Inspection**

#### **A. Written Report**

1. Complete inspection report within two weeks of inspection or receipt of sample results using standard DNR Open Feedlot Inspection Report – *see Appendix A*
2. Fill out facility description on the report including Facility ID number, name and address of the facility, person interviewed, inspection date and time, size and type of facility
3. Fill out inspection information section on the report including inspection date, purpose of inspection, persons interviewed, and receiving watercourse
4. Fill out compliance summary section including observations of manure control structures or types, man-made conveyances or contact with surface water and AFO/CAFO status: Large CAFO (NDPES status), medium CAFO, medium-sized AFO, or small AFO. Provide description and documentation to support conclusions
5. General Facility Description should include a brief description of facility, including capacity,

number of pens, manure control structures, and methods of land application. Also include manure control system type, its storage capacity, and legal description including number of acres included in the runoff control system

6. Summary should include major points outlined from the pre-inspection, inspection, record review and exit interview
7. Facility Evaluation should include comments about other supportive portions of the facility including stockpiles, feed storage and mortality areas
8. Document, based on all the information from the file review and the inspection, whether the facility discharges (continuously, intermittently or sporadically) to a water of the U.S. and requires an NPDES permit at this time. Document that an NPDES permit is not required at this time if, based on all the information from the file review and the inspection, it is determined that the facility does not discharge to a water of the U.S. Provide description and documentation to support conclusions
9. Requirements and Recommendations – Requirements are items that are violations or potential violations or areas of non-compliance. These may be violations of the Code of Iowa, Iowa Administrative Code or NPDES permit requirements. Each violation must be noted by the appropriate citation. Included in requirements are facility structure maintenance items. Requirements would normally include specific timeframes for correction of violations. Recommendations are suggested items noted or observed that are not necessarily violations but may be suggestions to improve record-keeping and/or operational aspects to improve environmental performance of the facility
10. Print and label all photos that were taken and note at appropriate location in the report

## **B. Report Submittal to Facility**

1. Transmit letter and Iowa DNR Open Feedlot inspection Report, including appropriate appendixes, photos, sample results and maps/diagrams
2. Letter should be a standard letter, letter of non-compliance, NOV, or notice of referral, as appropriate. Letter should include citation for rule or NPDES violation
3. If there is a referral based on the inspection, the violation(s) must meet the enforcement criteria identified in the DNR Enforcement Management System Manual and approval from the Field Office Supervisor and AFO Enforcement Coordinator
4. Complete and include AFO Regulatory Status Form.

## **C. Office/Database Updates**

1. Update all information in AFO database and FOCD
2. Add inspection report and any updates to the file
3. Mark Outlook calendar for any subsequent follow-up or due dates