



Work Plan Agreement 9/11/13

Between

The Iowa Department of Natural Resources and the Environmental Protection Agency Region 7

Attached to this correspondence is – Plan to locate unknown large CAFOs and medium-sized AFOs - This satisfies Objective 4, item A.1. (second part) due within 90 days of execution of the Work Plan.

Objective 4 – Compliance Evaluation and Inspections

- A. To implement a comprehensive survey to identify AFOs that are CAFOs that discharge to waters of the U.S. and have failed to apply for NPDES permits.
  - 1. Within 30 days of execution of this Work Plan, DNR will establish a baseline inventory of all known large CAFOs and medium-sized AFOs in Iowa based on up-to-date information contained in DNR's AFO database and provide this number to Region 7. Within 90 days of the execution of this Work Plan, DNR will provide Region 7 a written plan to systematically locate and/or identify any unknown large and medium-sized AFOs to supplement the baseline inventory. Private or personally identifiable information will not be included as part of these submittals.

Respectfully submitted to Region 7 on December 6, 2013.

for

Bill Ehm, Division Administrator

Iowa Department of Natural Resources

Environmental Services Division

## Plan to locate unknown large CAFOs and medium-sized AFOs

### Identification/Location

Including but not limited to:

1. Observe and examine latest available photos readily available on public mapping information, township by township, section by section, county by county. Document open lots and confinement buildings and compare findings with the AFO database.
2. Record unknown AFOs on a section map and date for future reference. Establish ownership utilizing plat maps and county assessor's webpage.
3. Prioritize according to potential size (number and size of confinement buildings, area of open lots or a combination of the two). Owners may be contacted by telephone or in person to determine facility capacity.
4. Goal of having desk-top identification done by **March 30, 2015**. This plan may be adjusted as needed and as technology changes. Track and record facilities per procedure yet to be developed.
5. Facilities identified as large CAFOs or medium AFOs by this plan will supplement the baseline inventory. They will receive a desk-top assessment and will be evaluated according to the desk-top SOP.
6. Other means of observation or identification: DNR drive-by, referral from other agencies, reports from the general public, etc.