



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

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 the enforcement checklist that satisfies Objective 6, item 2 due within 60 days of execution of the Work Plan.

Objective 6: To implement enforcement program that ensures penalties are sought in accordance with DNR's EMS and creates a stronger deterrent to noncompliance.

2: DNR agrees to develop checklists necessary to ensure consistent and appropriate enforcement responses by enforcement staff within 60 days of execution of this Work Plan.

Respectfully submitted to Region 7 on November 5, 2013.

A handwritten signature in blue ink, appearing to read "William A. Ehm".

William A. Ehm, Division Administrator

Iowa Department of Natural Resources

Environmental Services Division



IOWA DEPARTMENT OF NATURAL RESOURCES
ENFORCEMENT CHECKLIST FOR AFO/CAFO INSPECTIONS

INSPECTION DESCRIPTION

Date of Inspection
Facility Name Facility ID#
Facility Address
Inspector's Name

INSPECTION FINDINGS

Narrative Description of Investigation (evidence of current violations; indicators of past violations; future concerns):

- Photographs and/or Video
Water Samples (upstream and downstream)
Personal Interviews
Other

ACTION FOLLOWING INSPECTION

- No further action taken - no violation(s) observed
Informal Meeting Date
Letter of Inquiry Date
Letter of Noncompliance Date
Notice of Violation Letter Date

REFERRAL

- Fish kill/acute water quality degradation
Serious water quality degradation
Discharges of pollutants to state waters not authorized by an NPDES permit
Failure to obtain required NPDES permit

- Unauthorized construction
(Construction of AFO/CAFO structures (including open feedlots) without, or contrary to, a permit or other required documentation is also a DNR priority. Proper compliance with AFO siting and construction requirements is essential elements of the AFO program, which helps keep pollutants out of streams)
- Significant violations of NPDES permit and/or conditions in the permit
(Violations of a significant nature and/or repeated violations of operating or reporting requirements)
- Failure to submit MMP updates
(MMPs are the cornerstone of the animal feeding program. The MMP helps ensure that any proposed or current confinement feeding operation over 500 animal units has adequate land to use the manure nutrients it produces)
- Failure to obtain proper manure application certification
(The manure applicator certification program is an important component of the AFO regulations. The program ensures that manure is transported and applied properly)
- Other _____
- No referral warranted – does not meet referral criteria

Date of Referral to Legal _____