



Iowa Department of Natural Resources Comprehensive Survey Standard Operating Procedure

Following is a Comprehensive Survey standard operating procedure (SOP) intended to provide guidelines for Iowa DNR field staff. Iowa DNR will conduct a comprehensive survey of all large CAFOs and medium-sized AFOs that currently do not have NPDES permits to identify CAFOs that discharge to a water of the U.S. and have failed to obtain an NPDES permit or comply with other Iowa AFO program requirements.

Summary

The Comprehensive Survey involves establishing a baseline inventory of all large CAFOs and medium-sized AFOs using the Iowa DNR AFO database. All facilities will be subject to a desk-top assessment and some will also be subject to an on-site inspection, as described below.

Classifying a large or medium-sized facility as not needing an on-site inspection means that the desk-top assessment conducted pursuant to the AFO Desk-top Assessment SOP or findings from a qualifying prior on-site inspection is sufficient to support a determination that the CAFO or AFO does not discharge to a water of the U.S.

For facilities that require an on-site inspection, the inspection shall be performed utilizing the Open Feedlot (Non-NPDES) On-Site Inspection SOP and/or Confinement Facility (Non-NPDES) On-Site Inspection SOP, as appropriate. In addition, Iowa DNR will comply with any facility bio- security protocols when conducting on-site inspections, or, where there are no facility-specific protocols Iowa DNR bio-security protocols will be followed.

Process for Conducting Comprehensive Survey

Prioritize Assessments

This guidance is intended to prioritize the desktop assessments that will be conducted for all facilities included in the baseline inventory. The prioritization scheme is based on potential threats to water quality to best utilize Iowa DNR staff resources in the protection of the environment. The assessments will generally be performed in the order of the following priorities:

1. AFOs that have had spills, significant releases or legally sufficient complaints that involve discharges to a water of the U.S. Facilities that have had spills or releases since August, 2008 will be assessed. Part of the assessment will include whether the conditions that gave rise to a discharge to a water of the U.S. at an unpermitted large CAFO or a medium-sized AFO have been changed or corrected to eliminate the likelihood of repeated discharge.¹

¹ In determining whether a facility has eliminated the cause of a discharge or release, Iowa DNR will consider all relevant factors, including the following, as appropriate: physical changes in equipment, repairs or replacement; construction of manure storage, berms or other structures; establishment of standard operating procedures to institute changes in facility operation (e.g., schedule for equipment maintenance or calibration); training of new staff on new procedures and/or use of new equipment; and establishment of new contractual agreements (e.g., for mortality management, leasing of land for land application).

2. Large open feedlot CAFOs and medium-sized open feedlot AFOs, including combined facilities, which have both open feedlots and confinement facilities.
3. Confinement facilities that meet the definition of a large CAFO.
4. Medium-sized confinement AFOs.

Determine Whether On-site Inspections are Necessary

The following criteria will be used to make facility-specific determinations for all of the facilities included in the baseline inventory whether an on-site inspection will be conducted (in addition to completion of a desk-top assessment).

1. Large CAFOs: All large CAFOs (confinement, open lot, & combined) will require an on-site inspection. These inspections will occur in conjunction with on-site reviews of manure management plans, earthen basin reviews, or other routine activities for which the Iowa DNR has responsibility. An on-site inspection is not necessary for a large CAFO if 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.
2. Medium-sized confinement AFOs (by animal type and number): On-site inspections for medium-sized confinement AFOs, as determined by the AFO database, will be conducted in the following circumstances:
 - a. Desk-top assessment determines that the AFO discharged to a water of the U.S. within the last 5 years.
 - b. Desktop assessment determines that the AFO has had a significant release within the last 5 years, and the release presented a substantial threat of discharging pollutants to a water of the U.S.
 - c. Facilities that are less than ¼ mile from and draining toward a water of the U.S. AND utilize uncovered manure or litter storage.

For all other medium-sized confinement AFOs, the Iowa DNR will conduct a desk-top assessment pursuant to the AFO Desk-top Assessment SOP to determine whether an on-site inspection is needed.

3. Combined (open lot and confinement) medium-sized AFOs:

On-site inspections will be conducted if any portion of the open lot facility is less than ¼ mile from and draining toward a water of the U.S. and the open lot has more than 300 animal units. Desk-top assessments will be conducted on all other facilities pursuant to the AFO Desk-top Assessment SOP to determine if an on-site inspection will be conducted.
4. Open lot medium-sized AFOs:

On-site inspections will be conducted if any portion of the facility is less than ¼ mile

from and draining toward a water of the U.S. Desk-top assessments will be conducted pursuant to the AFO Desk-top Assessment SOP to determine if an on-site inspection will be conducted on all other medium-sized open lot AFOs.

Note: in some cases, small open lots may be visited to determine size threshold if information is not otherwise available. If it is determined that a facility is below medium-sized AFO threshold levels, no further investigations or inspections will be performed at that facility unless obvious environmental violations are observed.

September 11, 2013