



# 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 – develop a CAFO NPDES training curriculum for staff conducting NPDES Evaluations & Inspections at Animal Feeding Operations (AFO)/Concentrated Animal Feeding Operations (CAFOs) - This satisfies Objective 4, item C.2 part 1.

Objective 4 – Compliance Evaluation and Inspections

C. Resources and Training

2. Within 180 days of execution of this Work Plan, DNR will develop a CAFO NPDES training curriculum for staff conducting NPDES Evaluations & Inspections at Animal Feeding Operations (AFO)/Concentrated Animal Feeding Operations (CAFOs).

Respectfully submitted to Region 7 on December 17, 2013.

A handwritten signature in black ink that reads "William A. Ehm".

Bill Ehm, Division Administrator

Iowa Department of Natural Resources

Environmental Services Division

## **Iowa Department of Natural Resources CAFO NPDES Training Curriculum**

The Iowa DNR convened the below team to accomplish Objective 4, Section C, Action #2 of developing a CAFO NPDES training curriculum for staff conducting NPDES Evaluations & Inspections at Animal Feeding Operations (AFO)/Concentrated Animal Feeding Operations (CAFOs).

The team began in October 2013 and met approximately every other week to develop a training curriculum.

Sponsor – Bill Ehm, Division Administration – Iowa DNR

Team Lead – Barb Lynch, Bureau Chief – Field Services & Compliance

Team Facilitator – Ken Hessenius, Supervisor – Spencer Field Office

Program Inspector – Tom McCarthy, Environmental Specialist Senior – Manchester Field Office

Program Inspector – Trent Lambert, Environmental Specialist Senior – Mason City Field Office

Program Inspector – Alison Manz, Environmental Specialist – Atlantic Field Office

Program Inspector – Jeff Theobald, Environmental Specialist – Des Moines Field Office

Program Inspector – Jeff Prier, Environmental Specialist Senior – Washington Field Office

EPA Federal Partner – Stephen Pollard, AFO/CAFO Enforcement Coordinator – EPA Region 7

Support – Jerah Sheets, Executive Officer – Iowa DNR Central Office

### **Course Name: Iowa AFO Work Plan and SOP Session**

**Contact/Instructor:** Ken Hessenius

**Course Description:** The course goal is to acquaint participants with the contents of the updated AFO/CAFO program including:

- Summary of the relevant historical events of the Delegation Petition for Rulemaking
- Review of the Objectives and Actions of the National Pollutant Discharge Elimination System (NPDES) Work Plan signed September 11, 2013
- Analysis of the Standard Operating Procedures (SOPs) for:
  - AFO Desk-top Assessment
  - Comprehensive Survey
  - Animal Feeding Operation NPDES On-Site Inspection
  - Confinement Facility (non-NPDES) On-Site Inspection
  - Open Feedlot (non-NPDES) On-Site Inspection
- Review of updated forms, checklists, and report/response letters
- Statewide Consistency
- Participant dialogue, discussion, and situational examples

**Course Hours:** 3 hours classroom training (required by all AFO Field Office Inspectors) and 2 hours field site visit (required for Senior AFO Inspector)

**Attendees:** Required – All AFO Field Office Inspectors and Supervisors

Optional – Field Office inspectors in program areas other than AFO and Non-Field Office Staff including but not limited to AFO Permit Writers, Communications Staff, Legal Advisory, and other Iowa DNR interested employees.

### **Course Name: Hazardous Waste Operations and Emergency Response Standard (HAZWOPER)**

**Contact/Instructor:** Rodney Tucker with Contractors/DNR EHS Staff

**Course Description:** The HAZWOPER Program provides the principles and methodologies used to identify hazards and conduct work at hazardous waste sites which is required by 29 CFR 1910.120. The initial training consists of 40 hours of classroom and field exercises. DNR EHS staff will be able to assist in registering for this class. Annual 8 hour refresher classes are required to maintain the certification. DNR EHS staff conducts refresher classes in various locations throughout the year.

**Course Hours:** 40 hours one-time initial session with annual 8 hour refresher

**Attendees:** Required – All Field Office Inspectors and Supervisors

Optional – Non-Field Office Staff including but not limited to AFO Permit Writers, Communications Staff, Legal Advisory, and other Iowa DNR interested employees.

## **Course Name: AFO/CAFO NPDES Inspection/Case Development Training**

**Contact/Instructor:** EPA

**Course Description:** This training course will cover both basic and advanced inspection techniques related to CWA/NPDES inspections at animal feeding operations. Specific areas covered will include, documenting site conditions to determine if a facility has discharged, evidence collection and report writing. The course will also cover case development techniques related to penalty and economic benefit calculations and a discussion of recent court decisions and their impact on the NPDES program for CAFOs.

**Course Hours:** 8 hours

**Attendees:** Required – All AFO Field Office Inspectors and Supervisors

Optional – Field Office inspectors in program areas other than AFO and Non-Field Office Staff including but not limited to AFO Permit Writers, Communications Staff, Legal Advisory, and other Iowa DNR interested employees.

## **Course Name: Federal & State Rules and Enforcement Procedures**

**Contact/Instructor:** Ed Tormey

**Course Description:** Participants will explore the Federal and State code & laws, court decisions, and enforcement processes and calculations.

**Course Hours:** 6 hours

**Attendees:** Required – All Field Office Inspectors and Supervisors

Optional – Non-Field Office Staff including but not limited to AFO Permit Writers, Communications Staff, Legal Advisory, and other Iowa DNR interested employees.

## **Course Name: Safety and Water Quality Testing**

**Contact/Instructor:** State Hygienic Laboratory at the University of Iowa

**Course Description:** Introduction to field sample collection and sample submission to the laboratory. Participants will receive both classroom and field training. Laboratory analyst staff provide engaging demonstrations and discussion regarding defensible sample collection methodologies. Topics included but not limited to inorganic analyses (BOD, TSS, metals, N & P series), microbiological analyses (fecal coliform, E. coli, enterococci) and organic analyses (BTEX, herbicides). Chain of custody, data reporting, and web access resources are also covered.

**Course Hours:** 8 hours

**Attendees:** Required – All new AFO Field Inspectors and existing AFO Field Inspectors and Field Supervisors who have not attended in the past 5 years.

Optional – Non-Field Office Staff including but not limited to AFO Permit Writers, Communications Staff, Legal Advisory, and other Iowa DNR interested employees.

## **Course Name: AFO Field Inspector On-the-job training (OJT)**

**Contact/Instructor:** Field Office Supervisor will coordinate

**Course Description:** During the first 3 months of the start of a new employee in the feedlot program, they will obtain basic inspector training in various topics like sampling technique, rules, and other items. The following months after basic training will incorporate specific training within their program field.

- Training of at least 3 shadowed inspections with experienced team members and at least 3 co-inspections where the new inspector leads the inspection with experienced team members. After the shadowed and co-inspections, a consultation with the supervisor will determine if additional shadowed and co-inspections would be needed prior to sending newer AFO inspectors into the field on their own.
- Experienced team members will assist new feedlot team members with pre-site inspection materials, desktop assessment, and follow up reports. A consultation with the supervisor will determine if additional assistance would be needed prior to sending newer AFO inspectors into the field on their own.

**Course Hours:** Determined by Field Officer Supervisor in conjunction with inspector

**Attendees:** Required – New AFO Field Inspectors

Optional – None