


**IOWA DEPARTMENT OF NATURAL RESOURCES  
FIELD SERVICES AND COMPLIANCE BUREAU  
FIELD OFFICE #2 - MASON CITY IOWA**

**DATE:** June 13, 2013  
**TO:** The Record  
**FROM:** Jeremy Klatt   
**SUBJECT:** Hawkeye Pride Egg Farm Land Application Complaint  
Permit No. 4100201; Hancock County

On Thursday, May 30 this office received a complaint about runoff from Hawkeye Pride's land application field adjacent to the lagoon site. Hawkeye Pride has an NPDES permit for land application of the wastewater from their industrial wastewater lagoon. The field adjacent to the lagoon site is permitted for land application however; the permit contains the following conditions:

- "k" - Careful operation of the irrigation system shall be practiced to assure that there will be no ponding of the applied wastewater.
- "l" - Wastewater shall not be applied to flooded areas until the ground has sufficient time to dry.
- "o" - Land application of wastewater shall be stopped if runoff occurs.

I was at the facility on May 28, 2013 to conduct a site survey for the addition of five new buildings. No application of wastewater was observed at that time. It was noted that the farm ground in the area of the facility was too wet for field work.

On May 30, 2013 I investigated the complaint. Before stopping at the facility I observed the application field from the road. While I was observing the field, a Hawkeye Pride employee was observed driving a four wheeler through the application field. It was apparent that there was ponded water in the field, as I could see water splashing up from the tires as he drove.

I stopped at the facility and spoke with Randy Epting, the complex manager. Mr. Epting indicated that they had been applying to the grass area on their property to prevent the wastewater from overflowing the berms. He indicated that the owner of the other permitted application field is not allowing application on that field due to the wet conditions. I asked to see Hawkeye Pride's field and the lagoon. Mike Novotny, a Hawkeye Pride employee drove me out to the lagoon.

The lagoon had about one foot of free board (see attached). This is a violation of the permit that requires a minimum of two foot of freeboard. From the lagoon berm it was evident that the application field was very wet. I asked Novotny to drive me out to the area where runoff would occur (on the southwest portion of the field). We were unable to get to that spot because the application field was too wet. Mr. Novotny's four wheel drive pick up nearly got stuck in the application field due to the wet conditions.

I returned to the office to speak with Mr. Epting. I told him that I observed violations of the permit (freeboard, ponding of wastewater, applying to flooded areas). I was unable to observe whether or not water was running off of the property, but with the saturated conditions, any precipitation or application would likely result in runoff. Epting indicated that he had no other choice but to apply to that field or the lagoons would overflow. We discussed that the facility is in need of the control of more acres or additional storage capacity. I agreed that application to the saturated field was preferable to letting the lagoons overflow.

The following morning I sent Mr. Epting an email indicating that he could also reduce/eliminate influent flows to the lagoon or contact neighboring wastewater plants to see if they would be willing to take the water (see attached).

When talking to the complainant on May 30, I indicated that it would be beneficial if he could take pictures of the land application occurring. When I returned to the office after investigating the complaint, he had dropped photos off at the office for me (attached). He told me that these photos were taken on May 30.

I received a call on June 5 from Ron Covert, City of Algona WW Superintendent. He indicated that they were planning on taking wastewater from Hawkeye Pride. He indicated that it would be about five loads a day during business hours.

On June 10 Mr. Epting indicated that they had not started hauling to Algona and that they were waiting for a trucking company to become available to haul the wastewater. He also reported that no application had occurred between June 6-10.

Storage Cell with 1 foot of freeboard remaining

