



May 3, 2021

Responsible Transportation, LLC dba Keokuk Hills Beef, LLC
Attn: Keaton Walker & Bruce Levi - Owners / Managers
22034 200th Street
Sigourney, Iowa 52591

Notice of Violation: Improper Dead Animal/Solid Waste Disposal, 455B.307, Iowa Code,
and 567 IAC 100.4(2)"b"
Air Quality Control Equipment Maintenance, 567 IAC 24.2(1)

RE: Dead Animal Complaint Investigation (Complaint No. 29421)
Facility No. 54-01-008

Dear Mr. Walker and Mr. Levi:

On April 28, 2021, this office received a complaint stating that Responsible Transportation, LLC, had three dead cows and their incinerator is generating odors and air pollution. On April 30, 2021, I investigated the complaint. I met with Mr. Walker regarding the nature of the complaint. Mr. Walker stated that the incinerator was operating and that it takes about 30 hours to consume a full cow. He stated that the facility has several cows and that it has created a back log of dead animals to be incinerated. The incinerator was cleaned in between reloading the dead animals. He stated that they no longer compost animal waste, and that all animal waste material is taken to SEMCO landfill on a daily basis. I asked why he doesn't dispose of the dead cattle in that fashion, he said that SEMCO will not accept full dead animals. I told him that I would visit with SEMCO staff regarding that. I documented a 20-yard roll off dumpster half full of animal waste, including cattle heads. The incinerator was operating and generating a fair amount of smoke, the temperature monitor indicated 1432°F, which is lower than the 1600°F afterburner minimum temperature, except for startup or shutdown.

On May 3, 2021, I contacted Bill Sloop, SEMCO Landfill Supervisor, regarding Mr. Walker's concerns. Mr. Sloop stated that SEMCO will accept dead animals, but they have some criteria they prefer recently dead, early delivery of the dead animals and prior notification of the delivery to ensure they have a place to receive the dead animals. Mr. Sloop stated that he does not want dead animals coming in every day from a particular facility, he stated that was willing to assist infrequent situations where an animal needs to be disposed of.

Air Quality

Subrule 567 IAC 24.2(1) specifies that equipment and control equipment must be maintained and operated in a manner consistent with good practice for minimizing emissions and that any cause of excess emissions must be remedied expeditiously. Therefore, your incinerator should be utilized to minimize emissions from your business operation.

Stated below is a brief summary of additional rules that apply to you and your facilities.

Solid Waste

Subrule 567 IAC 100.4(455B) states a private or public agency shall not dump or deposit or permit the dumping or depositing of any solid waste at any place other than a sanitary disposal project approved by the director, or pursuant to a permit granted by the department which allows the disposal of solid waste on land owned or leased by the agency.

Please submit a written plan of action by **May 31, 2021**, to help ensure you have a contingency plan that negates numerous dead animals from becoming backlogged at your facility again. Be advised that due to your open dumping violations has resulted in a further review of the situation and potential referral of this matter to DNR Legal Services Bureau in Des Moines for appropriate enforcement action with monetary penalty.

I will conduct a follow up visit to verify your continued compliance in this matter. If you have any questions or would like further explanation of any part of this report, please contact me.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU



Ryan Stouder
Environmental Specialist Senior

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Encl. Solid waste Rules, Dead Animal Rules factsheet

xc: - IDNR AQ Bureau via email
- Dr. Jeff Kaisand, IDALS, Wallace State Office Building, 502 E. 9th St.,
Des Moines, Iowa 50319
- Responsible Transportation - AQ File