



July 2, 2019

Craig Ambrose
Cargill, Inc.
17540 Monroe-Wapello Road
Eddyville, IA 52553-5000

RE: Solid Waste Land Application Inspection
Cargill, Inc., 17540 Monroe-Wapello Road, Eddyville, IA
Sanitary Disposal Project Permit # 68-SDP-12-11P-LAN; Complaint No. 26929

Dear Mr. Ambrose:

Enclosed is the report completed by Bill Gross of the Field Office #5 staff following the inspection of the Cargill land application operation near Eddyville.

The report should be self-explanatory. Please take note of the reminders and recommendations listed near the end, and address them as soon as possible.

You may contact Bill Gross (515-725-0271; bill.gross@dnr.iowa.gov) or this office with any questions or comments. We appreciate the assistance of Messrs. Snyder and Phillips during this inspection.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ted Petersen", with a stylized flourish at the end.

Ted Petersen
Supervisor, Field Office #5

c: Theresa Stiner, Iowa DNR Land Quality Bureau (w/encl. via email)
Kurt Levetzow, Iowa DNR Field Office 6 (w/encl. via email)
Chris Snyder, Cargill, Inc., chris_snyder@cargill.com (w/encl. via email)

**IOWA DEPARTMENT OF NATURAL RESOURCES
LAND APPLICATION (LAN) INSPECTION FORM**

Permit No.: 68-SDP-12-11P-LAN	County: Monroe
Facility Name: Cargill Corn Milling	Facility Address: 17540 Monroe-Wapello Road Eddyville, IA 52553-5000
Phone Number: 641-969-4500	
Responsible Official: Craig Ambrose Phone Number: 641-969-4500 Person(s) Present: 1) Steve Phillips (641-969-3918) 2) Chris Snyder 3)	Mailing Address: Cargill, Inc. 17540 Monroe-Wapello Road Eddyville, IA 52553-5000
Date of This Inspection: 6/14/2019	Date of Last Inspection: NA

IAC 567 Chapter 121.7(1) "c": Permitted Land Application Operating Requirements		Yes	No	NA
Land Application Permit Operating Requirements	121.7(1) "c" (1) Are the general public and livestock restricted from the site during sludge disposal and a minimum of two months after land application of solid waste? - Note: This requirement is waived if a permit condition specifies otherwise.	☒ ?	☐	☐
	121.7(1) "c" (2) Can the permit holder provide evidence that the pH of the surface horizon or plow layer is maintained above 6.5? - Note: This requirement is waived if a permit condition specifies otherwise.	☒ ?	☐	☐
	121.7(1) "c" (3) Was the land application site used for disposal of solid waste during or immediately preceding expected: rains or other occasions when runoff may result (unless subsurface injection methods are utilized); high groundwater conditions; or flooding?	☒	☐	☐
	121.7(1) "c" (4) Were special precautions taken to avoid runoff if land application took place on frozen or snow covered ground?	☐	☐	☒
	121.7(1) "c" (7) Were laboratory analyses of the solid waste and site soils performed and submitted as stipulated in the permit?	☒	☐	☐
	121.7(1) "c" (8) Were records and reporting requirements of site usage maintained and submitted to the department as stipulated in the permit? Note: This may include an annual Certified Professional Agronomist Report due on November 1 st .	☒	☐	☐
	Were all other general and special provisions in the land application permit complied with? [storage pile runoff]	☐	☒	☐

Comments

- On June 6, 2019, the Iowa DNR received a complaint (No. 26929) about the land application activities pertaining to this permit.
- The current permit was issued September 14, 2018, and expires September 14, 2021. Fields located in Monroe, Mahaska, Wapello, Keokuk, Appanoose, Davis, and Jefferson counties are included in the permit and amendment.
- The permit allows for the annual land application of up to eight dry tons of diatomaceous earth (precoat) or mycelium and five dry tons of scrap feed by-products.
- Mr. Snyder reported that 4000-6000 tons of waste for land application are generated monthly at the Cargill facility. If waste cannot be disposed of properly by land application, it is taken to a sanitary landfill.
- Extended Ag Services is the contractor that oversees the land application process. An agronomist is employed to determine proper application rates. Environmental Land Management applies the waste. Landowners / farmers are responsible for incorporation (when necessary) and future land use. Mr. Snyder reported that Cargill audits these activities quarterly.
- From the records provided, soil in a few fields have a pH below 6.0.
- Scrap feed is somewhat putrescible so its prompt incorporation is important to prevent odor problems. I noticed no significant odors at the sites we visited.
- We examined three nearby storage sites: Harris Cargill 95 (Wapello Co.), Walker Farm (Monroe Co.), and Henderson Shop (Monroe Co.). There was some evidence of waste runoff from previous precipitation events at each site. At the Harris site, waste residue had reached the county road ditch to the north.
- We examined two recent application sites in Monroe County: Harris Teno and Harris Magee. Land at these sites is fairly level and there was no evidence of runoff.

Summary of Reminders:

- 1) Ensure that waste runoff from storage sites is adequately controlled.
- 2) Where necessary, make sure that applied waste is being incorporated in a timely manner.
- 3) Ensure that soils where land application occurs have a pH of 6.5 or higher.
- 4) Regularly review storage, land application, and land use requirements with contractor(s) and landowners.
- 5) The land application permit has a September 14, 2021, expiration date.

Summary of Recommendations:

- 1) Install earthen berms or other runoff control devices around waste storage piles.
- 2) Inspect storage and land application sites frequently to ensure compliance.
- 3) Incorporate all solid waste within 48 hours of application.
- 4) Apply ag. lime on low pH soils

AUTHENTICATION

INSPECTOR: Bill Gross



DATE: 7/1/2019

REVIEWER: Ted Petersen



DATE: 7/1/2019

Harris Cargill 95



Walker Farm



Henderson Shop

