

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

**DATE:** July 17, 2014

**TO:** The Record

**FROM:** Dan Bratrud

**SUBJECT: Hawkeye Pride Egg Farm LLP Manure Complaint #17915**  
1275 Deer Ave, Corwith IA, Section 21, Magor Township

I received a page at 6:25 P.M. on Saturday June 14, 2014 about manure spilled over the wall of the manure containment building at Hawkeye Pride Egg Farm located south of Corwith, IA. The page stated heavy rain is falling and caller is concerned about run-off. The contact phone number was for the facility. I called the number left on the pager and talked to Mike Moss, an employee at Hawkeye Pride Egg Farm. I told Mr. Moss why I was calling and asked if he could check to see if there was in fact manure over the wall and whether or not there were any run-off concerns from the spilled manure.

Mike called me back at 6:45 P.M. He told me that he had observed manure contaminated water entering what he believed to be the storm drain. When I asked if he knew where the drain outlets and whether there would be any chance of the contaminated water getting into a water source he did not know. At this time I decided to visit the site and see if I could track the flow path.

I arrived at the facility at 8:05 P.M. I approached the facility from the west on 130<sup>th</sup> Street. As I approached the facility site I saw the manure storage shed and the manure that had been spilled over the wall. I proceeded to the gate on the north side of the facility. There I was met by Mr. Moss. I introduced myself and asked if we could look at the area of concern. Mr. Moss took me around the south end of the facility and back north up a road that led to an alley between the production buildings and the manure storage building where the storm drains are located.

Mr. Moss directed me to what he believed were the storm drain intakes. The intakes appeared to be more of a French drain intake as they were covered with large rock. There was very wet manure; approximately two inches thick, covering a large area in the alley. There was still some discolored water standing around the drain intake location but most of the water had drained down leaving just wet manure solids. I asked Mr. Moss if he knew where the outlet was for the drains. He said he had located the outlet in an open ditch to south which leads to the storm water pond.

We went to the outlet for the storm water pipe in the open ditch at the south end of the property. I observed discolored water that had the odor of chicken manure discharging

from the outlet pipe. We followed the open ditch to the east but the vegetation and poor lighting at dusk made it hard to see how far east the discolored water was flowing. We followed the ditch to where it dumped into the storm water basin. There were a few small areas of pooled water in the basin but the water did not appear to be discolored or have the manure odor.

While at the storm water basin I observed an intake in the pond. The intake had a perforated stand pipe with solid collar around the bottom of the pipe. The collar appeared to be only approximately 12-18 inches tall which would not give the storm water basin much storage space before the water would discharge to the road ditch. There was no discharge from the outlet at this time.

I drove south along the road and located what the flow path would be for discharging water. It flows under the road, Deer Avenue, through a large box culvert to the east/northeast and into a grassed waterway. There was no flow through the box culvert at that time. I also drove around the section to see where the grassed waterway/open ditch outlets into the Boone River. There was no flow from the outlet at that time.

I returned the facility at approximately 9:15 P.M. It was too dark to get any more pictures but I asked Mr. Moss to contact me if they did receive heavy rain overnight so I could come back the next day to get more pictures and do some sampling. He stated that he would contact me if that occurred. I told him that I would be in contact with someone at the facility on the following Monday one way or the other. He offered me his cell phone number and also the names of the plant manager, Randy Epting and the production manager, Nick Alt as contacts for future visits or questions. The heavy rain missed the area on Saturday night.

Heavy rain returned to the area late on Monday June 16, 2014 and overnight into Tuesday June 17, 2014. Suspecting that there had been enough rainfall to cause the storm water basin to discharge I made the decision to visit the Hawkeye Pride Egg facility on Tuesday morning June 17, 2014. Daniel Watterson, IDNR FO2, and I arrived at the facility at approximately 10:30 Tuesday morning. It was quite obvious the area had received heavy rain overnight.

We drove to the site where the storm water discharges from the storm water basin to the road ditch and found the outlet pipe was submerged but water was bubbling up in that area indicating that the pond was discharging. We took a HACH field sample of the discharge water and found that it read  $>3.0$  mg/L ammonia. We moved approximately 50 feet upstream from the discharge pipe in the road ditch and got a sample reading of 2.5 mg/L ammonia. We moved approximately 80 feet downstream where the water from the discharge pipe was flowing in the road ditch and got a reading of 3.0 mg/L.

ammonia. We took HACH field samples at several other sites upstream and downstream of the discharge and found a range of 0.0 – 1.0 mg/L ammonia. This indicated that the high ammonia readings were coming from the discharge water from the storm water basin.

At this time we contacted Trent Lambert, Iowa DNR FO2, and told him what we had found. Trent advised us to collect sample bottles to be sent to the state hygienic laboratory and that samples collected should be tested for ammonia and BOD. The following table shows the results of the samples collected.

Site Number	Sample Site	Ammonia	BOD
1	Hawkeye Pride discharge	4.0 mg/L	20 mg/L
2	132' south(downstream) of discharge	2.0 mg/L	17 mg/L
3	Culvert at SE driveway north of discharge	0.080 mg/L	4 mg/L
4	Wood box culvert south of discharge, east side of road	0.31 mg/L	3 mg/L
5	NW corner of Deer Ave & 130 <sup>th</sup> St.	0.17 mg/L	4 mg/L
6	Culvert west of facility on 130 <sup>th</sup> St.	0.80 mg/L	<2 mg/L

As we began to collect samples a passing car stopped to talk. The driver of the car was a neighbor to the facility, Thurman Gaskill. Mr. Gaskill reported that the area had received approximately four inches of rain overnight. He also stated that he questioned the design of storm water basin when it was designed and built. He told us that he had completed a large drainage project about the same time the storm water basin was built and that he offered Hawkeye Pride Egg a better solution for an outlet for the storm water pond but they turned him down. He also stated that he has had a number of discussions with the plant manager, Randy Epting, about the housekeeping and management of the facility. He expressed some of his concerns to us and thanked us for being there to check on things.

After collecting the samples we contacted Randy Epting, Hawkeye Pride Plant Manager, to see if we could meet with him. We met with Mr. Epting in his office at the facility at approximately 1:30 P.M. I told him that I had visited the facility on Saturday evening June 14, 2014. While there I observed manure spilled over the west wall of the

containment building and a layer of manure on the gravel driveway between the containment building and the production buildings near the storm drain locations.

Mr. Epting was aware that someone had complained about manure being spilled over the wall of the containment building. He blamed the new manure handler/brokers for poor housekeeping procedures. He admitted that Hawkeye Pride staff had failed to clean up spilled manure on Friday June 13, 2014. He stated that usually someone from management checks to be sure that spilled manure is cleaned up before they go home but management staff had left early on Friday June 13, 2014. He said he had some of his staff cleaning up the spilled manure on Monday morning June 16, 2014.

I told Mr. Epting that on Saturday evening I had observed what I believed to be manure contaminated water discharging to the open ditch at the south end of the property. I asked him if this is where the storm water drains outlet and he confirmed that it was. I mentioned the location of the storm water drains between the manure containment building and the production buildings. The drains are located near if not directly under the conveyers that bring the manure from the production buildings to the manure containment building. If any manure spills off the conveyer and is not immediately cleaned up there is a risk of the manure getting into the storm water system. He told me that he was aware of the flaw in the design of the storm water drain system and he was talking to engineers about changing the location of the drains.

I told Mr. Epting that on Saturday evening I had looked at the storm water basin and observed a perforated intake pipe near the southeast corner of the pond. The pipe appeared to outlet to the road ditch east of the storm water pond. I observed a short section of solid pipe, approximately 12-18 inches tall, around the bottom of the perforated pipe. I asked if that would be the depth of the holding capacity of the pond. He said that is the way the outlet for the storm water pond was designed. I questioned if this was enough holding capacity for the storm water system. He told me he would ask the engineers to look into this.

I then told Mr. Epting that we had sampled water discharging from the storm water pond and found ammonia levels higher than 3 mg/L. He stated that he did not believe that this was being caused by any spilled manure at the facility. He had several ideas what might be causing the high ammonia levels ranging from someone deliberately dumping ammonia nitrate in the storm water basin to nitrogen running off from surrounding farm fields.

I asked Mr. Epting if he would allow us on the facility property to sample the outlet for the storm water drains and the water in the storm water basin. He denied us access to the facility and said he would have his guys do that sampling. I asked if they would be doing that sampling yet on Tuesday afternoon, June 17, 2014. At that time he called

Jason Butler from the I & S Group, the consultants and engineers for Hawkeye Pride Egg. He asked Mr. Butler if he would be able to come to the facility and do the sampling. Mr. Butler asked if he could come the next day and have IDNR FO2 staff available to split samples. I told him that I would have to consult senior staff about coming back to split samples. It was later decided that there would be no benefit to going back to split samples.

Mr. Epting assured us that he was already in the process of consulting engineers about redesign of the storm water system. He stated that since he was actively trying to "fix" things he did not feel there should be any enforcement action taken against Hawkeye Pride Egg, even though he denied any wrong doing in the first place. We told him that it would depend on what the laboratory samples showed for ammonia levels and that enforcement actions would have to be discussed with senior staff. We asked him to keep us informed about changes and improvements made to the storm water system.



Storm water drain between manure building and production buildings.



Storm water drain covered with manure.



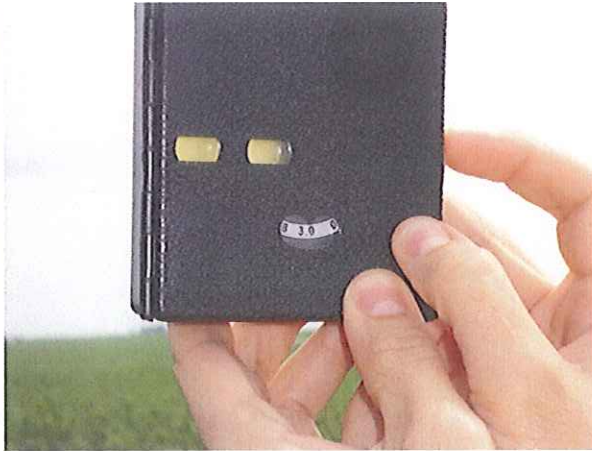
Storm water basin and outlet tube



Storm water basin and discharge pipe



Discharge from storm water basin  
sample site #1



HACH sample at discharge >3.0 mg/L



Looking south from discharge pipe



Sample site #2



Sample site #3



Sample site #4



Sample site #5



Sample site #6



West wall of manure containment building after clean up

Hawkeye Pride Egg Farm LLP, Facility #66173, Hancock County

Sample site #5

Approximate location of storm water drains

Storm water drain pipe

Sample site #3

Sample site #1

Sample site #2

Sample site #4

Open drainage ditch

Storm water basin outlet pipe

Sample site #6

Field water flow around the facility

