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Doc # 46565

94-SDP-16-02X-com  
Converp, File  
STATE OF IOWA

THOMAS J. VILSACK, GOVERNOR  
SALLY J. PEDERSON, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES  
JEFFREY R. VONK, DIRECTOR

JC AUG 2002

August 9, 2002

Rodney Kern  
Fort Dodge Animal Health  
PO Box 518  
Fort Dodge, Iowa 50501

Re: Compost/Manure Storage Pile

Dear Mr. Kern:

I'm writing to follow-up on our visit of 30 July concerning the complaint this office received. The complainant alleged improper handling of manure at Fort Dodge Labs. I found that there is a large pile of manure stored in the field west of the lab buildings. According to Miles Van Patten there have been several animals incorporated into the pile for composting. He also said the pile is turned a couple of times a year with a bull dozer to enhance composting. It does not appear that finished compost is land applied regularly.

As you know the Department is reviewing the issue of whether a permit is required for this type of activity under the new Composting Rules of Chapter 105. It appears you will be working with Paul Lundy of our Solid Waste Permitting Section to resolve this issue.

When we toured the compost area I found leachate puddles in several areas. In addition I don't believe the current pile is manageable as compost because of the large continuous pile. We located one tile intake about 40 yards from the edge of the compost pile and there is another storm water intake further to the south of this area. There certainly is a possibility for leachate to flow to these intakes with rainfall.

Because you have dead animals in the compost you are subject to the regulations under 567 IAC105.6. I've already provided a copy of these rules to you. These are new rules and are less restrictive than the previous regulations. One regulation you should take a look at is 105.6(4) which states that compost is applied to cropland or pastureland in a manner that prevents the runoff to a water of the state and it recommends that it not be applied in excess of crop's nitrogen or phosphorus utilization requirements.

Although I did not document any violations of the Iowa Administrative Code during this visit you would have been in violation of the Composting Regulations in existence in April of this year. However, I do have a concern about proper management of the manure/compost pile as it exists today. There is the potential for leachate and manure solids runoff since there is a tile intake close to the pile and other stormwater drainage nearby.

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If leachate or manure solids enter a tile intake or stormwater intake you could violate the General Water Criteria of 567 IAC 61.3(2) (copy enclosed). In addition, the minimum level of manure control for any open feedlot shall be the removal of settleable solids from the manure prior to discharge into a water of the state, 567 IAC 65.2(1) (copy enclosed). The Department considers water in tile systems as waters of the state.

You showed me a copy of a composting plan that you developed but have not yet implemented. If you would implement this plan and manage the compost pile you probably could prevent any water quality problems.

Please call me when you have implemented the composting plan and I will inspect the site again. Because you have numerous open lots of various farm animals you should also be aware of any runoff of manure from these facilities. We can discuss any of those issues on my next visit.

Should you have any questions please call this office.

Sincerely,

**FIELD SERVICES AND COMPLIANCE BUREAU**



Dennis Ostwinkle  
Environmental Specialist

DO  
Enclosure(s)

cc: Solid Waste Section