

REPORT OF CONCENTRATED ANIMAL FEEDING OPERATION INSPECTION

At

Kollasch Farms, Inc. #1
(b) (6)
Whittemore, Iowa 50598

ON

September 17, 2024

BY

U. S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division (ECAD)

1.0 INTRODUCTION

I performed a Concentrated Animal Feeding Operation (CAFO) inspection at the Kollasch Farms, Inc. #1 facility on September 17, 2024. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended. This narrative report and Attachments present the findings and observations made during the inspection.

2.0 PARTICIPANTS

Mike Kollasch, Owner/Operator

U.S. Environmental Protection Agency (EPA):
Stephen Pollard, (Lead Inspector) (913) 551-7582
Email: pollard.stephen@epa.gov
Zachary Leibowitz, Physical Scientist
Email: leibowitz.zachary@epa.gov

3.0 INSPECTION PROCEDURES

I contacted Mike Kollasch via telephone on Friday, September 13, 2024, and stated that I was planning to perform an inspection of the Kollasch Farms, Inc. #1 facility on Tuesday, September 17, 2024. Mr. Kollasch stated that he would be available, and we agreed to meet at 11:00 am. I also stated that I would have another EPA employee with me during the inspection.

Prior to entering the facility, I conducted a visual reconnaissance of the property and its land application areas, searching for areas of concern observable from the county roads such as discharges, drainage patterns, flow directions, distance and direction of nearest perennial waters, visual condition of perennial waters, facility location and layout. The facility is located approximately 3.5 miles west of Whittemore, Iowa. The nearest receiving waterbody is Prairie

Creek and is located approximately 350 yards north of the facility. Prairie Creek was flowing at the time of the inspection and is identified as a perennial water per the USGS topography maps.

I arrived at the facility at approximately 11:00 am and met with Mr. Kollasch. I presented my credentials and explained both the purpose of the inspection and the procedures I would follow during the inspection. Mr. Kollasch stated that he was the operator of the facility and took care of day-to-day operations. I asked Mr. Kollasch if the facility had a bio-security protocol and he asked that we wear disposable boot covers while on the property and to not enter the buildings. I informed Mr. Kollasch that since the facility did not have a formal bio-security protocol, I would also be following the EPA Region VII bio-security protocol (SOP No. 2332.09C). Mr. Kollasch accompanied us during the entire inspection of the production area. He did not accompany us during our evaluation of the land application areas and sampling of tile outlets.

I explained to Mr. Kollasch that I would be conducting the CAFO inspection under the authority of Section 308(a) of the Federal Water Pollution Control Act to evaluate the facility's compliance status with the requirements of the Clean Water Act (CWA). I explained that the inspection would consist of a review of facility operations, required records, waste generation and management practices, and a visual inspection of the facility. I stated that I would document my findings and observations by taking photographs and/or videos, obtaining statements from facility staff, obtaining land application/inventory records, and collecting samples of any observed discharges. I conducted this inspection in accordance with the most current procedures described herein and following all applicable EPA Region 7 Standard Operating Procedures (SOPs), unless otherwise noted.

I completed my inspection, and I summarized the findings and recommendations with Mr. Kollasch during the exit briefing. I did not issue a Notice of Preliminary Findings at the time of the inspection. Twenty-five digital images were taken the day of the inspection. See Attachment 1 for the digital images chain of custody/image log and images #1 - #25. See Attachment 2 for the facility layout and image locations. See Attachment 7 for my observations of Prairie Creek.

4.0 FACILITY DESCRIPTION

4.1 Facility Operations

The main facility is located approximately 3.5 miles west of Whittemore, Iowa in the Prairie Creek Watershed (HUC12 071000020601). The facility's physical address is (b) (6), Whittemore, Iowa 50598. The legal description for the facility is the (b) (6), in Township 95N, Range 31W, in Palo Alto County, Iowa.

Mr. Kollasch stated that the facility receives piglets, and they are then fed out to approximately 280-320 pounds. The facility will have two turns per year with placements typically occurring in spring and fall.

The main facility is approximately 4 acres in size and consists of three confinement barns with a total capacity of 3,300 head and accompanying feed bins. Manure is stored in earthen storage basin located west of the confinement barns. The basin is approximately 350 feet long and 100 feet wide. Mortalities are picked up by a local rendering service. The State of Iowa requires Kollasch Farms to have a Manure Management Plan (MMP) that identifies how and where manure will be land

applied. The 2021 MMP identifies 525 acres on 15 fields available for land application. The facility uses commercial applicators for manure application in the spring and fall.

4.2 CAFO Status

Mr. Kollasch stated that the facility has confined at least 2,500 swine weighing over 55 pounds for more than 45 days during the last 12-month period. All animals are confined in areas where crops, vegetation, forage growth or post-harvest residues are not sustained. Mr. Kollasch stated that the number of swine currently at the facility was approximately 2,600 head. A review of inventory records submitted to EPA after the inspection confirmed that the facility has been confining at least 2,500 swine weighing over 55 pounds for more than 45 days during the last 12-month period (Attachment 3). As a result of my observations, I determined that the facility meets the definition of a large CAFO as it is defined in Title 40 of the Code of Federal Regulations (CFR), Part 122.23.

4.3 Regulatory History

The facility does not have an NPDES permit and prior to this inspection had never been inspected by EPA. IDNR's last onsite inspection was performed on November 15, 2023. Prior to that inspections were performed on December 1, 2022, October 10, 2022, October 15, 2021, and July 7, 2020. No informal or formal enforcement actions were associated with these inspections.

5.0 FINDINGS AND OBSERVATIONS

The weather conditions at the time of the inspection were partly cloudy and mild (80°F). I met with Mr. Kollasch and discussed operational processes being performed at the facility. I performed a visual inspection of the facility and reviewed MMP records maintained onsite. The facility has been operating as a large CAFO since it began operations in 1990.

5.1 Production Areas

During the visual inspection of the production area, I observed three confinement barns and feed bulk bins (Images 4-12). As discussed above, manure and process wastewater are stored in an earthen basin adjacent to the confinement barns (Images 1-3). The site was well maintained, and I did not observe any uncontrolled manure, feed, or process wastewater. Land application records provided after the inspection indicate the last time manure was pumped from the basin was on October 17, 2024. Mortalities at the facility are placed on the ground outside of the barns and picked up by a rendering company on routine basis. There were no mortalities present at the time of the inspection.

I did observe a poultry litter stockpile located in the northeast corner of field F3-8 that was uncontrolled and located within 50 yards of a tile inlet (Images 22-24). I estimated the pile to have been 250 yds³ in size. During significant precipitation events, runoff from this stockpile will flow into the tile outlet. Mr. Kollasch indicated that this tile inlet is connected to an existing tile that flows west under 550th street and into the neighbor's property. Mr. Kollasch stated that the litter was brought in by a farmer renting the ground and that it was not generated by Kollasch Farms, Inc. #1 and not under his direct control. He also stated that he did not know when the stockpile was placed in the field but thought it would likely be land applied before winter. I told Mr. Kollasch

that manure or litter stockpiles should not be placed near tile inlets unless runoff from the stockpile can be controlled or diverted away from the inlet.

5.2 Land Application Areas

The discharge of manure, litter, or process wastewater from a land application area under the control of an unpermitted CAFO is a discharge subject to NPDES permitting requirements, unless the discharge is an agricultural stormwater discharge. To be considered an agricultural stormwater discharge, the CAFO must land apply manure, litter, or process wastewater in accordance with site-specific nutrient management practices that ensure appropriate agricultural utilization of the nutrients in the manure, litter, or process wastewater, as specified in § 122.42(e)(1)(vi)–(ix). Nutrient management practices and rates of application meet these requirements when they are done in accordance with state technical standards. To ensure that CAFOs meet these technical standards, the State of Iowa requires a site-specific MMP be developed that identifies the nutrient management practices the CAFO will follow.

The IDNR requires all facilities that confine greater than 1,250 head of swine weighing greater than 55 pounds to submit a complete “original” or “long form” version of their MMP every four years to IDNR and an annual update or “short form” each of the remaining three years that identifies any changes to the existing MMP. The facility’s last “long form” MMP was received by IDNR on March 30, 2021 (Attachment 4), and annual updates were submitted for 2022 through 2024. None of the updates on file with IDNR indicated changes to land application fields and/or crop rotations from the original 2021 MMP. Pumping and spreading records were provided to me via email and are included as Attachment 5.

To determine if precipitation-related runoff from the facility meets the definition of agricultural stormwater discharge and therefore exempt from the NPDES permitting requirements, I reviewed the MMP, annual updates, pumping/spreading records, manure analysis and soil analysis records that were provided by the facility.

Based on my review of the above listed documents, I made the following findings:

1. The 2021 long form MMP identifies 525 acres on fifteen fields available for manure application.
2. Manure was applied to fields F14-1 and F3-8 during crop year 2021 when the MMP planned for soybeans and no planned land application.
3. The 2021 long form MMP identified corn being grown on F3-8 during crop year 2022 but soybeans were grown, and manure was applied.
4. Manure was applied to field F3-8 during crop year 2023 when the MMP did not plan on any application.
5. Poultry litter was stockpiled for 2025 crop year land application on field F3-8, but MMP does not account for this additional nutrient source when determining application rates.

6.0 Water Sampling

Land application field F3-8 contained subsurface drainage tiles. Mr. Leibowitz and I observed at least three tile outlets along Prairie Creek. See attachment 2 for the specific location of these outlets. Outlets #1 and #2 were discharging into Prairie Creek on the day of the inspection. Outlet #3 was not discharging. According to the facilities land application records, this field had manure applied on October 22, 2022, and then again on October 15-17, 2024 (after inspection). Water samples were collected from outlets #1 and #2 along with corresponding up and downstream samples. A summary of the analytical results from these two samples is included in Table 1 below. The complete analytical results are included as Attachment 6.

Table 1. Analytical Result Summary – Kollasch Farms, Inc – Site #1

Analyte	KOL-1 UP	KOL-1 OULET	KOL-1 DOWN	KOL-2 UP	KOL-2 OULET	KOL-2 DOWN
N, Nitrate+Nitrite (mg/L)	0.971	9.06	1.68	0.603	9.15	0.707
Total Kjeldahl Nitrogen (mg/L)	0.81	4.92	1.77	0.92	0.23	1.52
Ammonia (mg/L)	0.047	2	0.24	0.052	0.021	0.039
Phosphorus (mg/L)	<0.05	0.7	0.09	<0.05	0.18	0.08
Chloride (mg/L)	23.8	182	36.6	24	21.5	23.9
BOD5 (mg/L)	<2	53.9	5.54	2.33	<2	2.43
E. coli (MPN/100mL)	121	>24,196	>24,196	52	<10	52
Total Coliforms (MPN/100mL)	7,701	>24,196	>24,196	11,199	161	8,664
Total Suspended Solids (mg/L)	4	11.3	4.67	1.67	0.75	11.7

6.0 SUMMARY

Kollasch Farms is located approximately 3.5 miles west of Whittemore, Iowa. The site has three confinement barns with a total capacity of 3,300 head and an earthen manure storage basin. The facility is operating as a large CAFO confining greater than 2,499 head of swine weighing greater than 55lbs. The Facility does not have an NPDES permit.

I did not observe any uncontrolled manure, feed, or process wastewater in the main production area. However, I did observe a large poultry litter stockpile located in the northwest corner of field F3-8 that was uncontrolled and located within 50 yards of a tile inlet.

My review of the MMP and associated land application documentation identified several fields that had crops and manure application that was not in accordance with the MMP. There also appears to be application of poultry litter (not generated at facility) to field F3-8 that is not accounted for in the MMP.

I collected six water samples associated with two tile outlets discharging from land application field F3-8 into Prairie Creek.

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Stephen Pollard
Environmental Scientist

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Melissa Bagley
Acting Branch Supervisor

ATTACHMENTS:

1. Digital Image Chain of Custody/Image Log and Images #1 - #25 (27 pages)
2. Facility Layout-Image Locations-Land App Areas (2 pages)
3. Inventory Record (1 page)
4. 2021 Manure Management Plan “Long Form” (218 pages)
5. Manure Application Records (13 Pages)
6. Stream Sampling Results (12 Pages)
7. Stream Characteristics Form (1 page)