

Wyoming Department of Environmental Quality

WYPDES CAFO Inspection

“What to Expect When You’re Inspected”



Since its inception in 1973, the Wyoming Department of Environmental Quality, Water Quality Department has been charged with the mission of monitoring and protecting the Waters of the State of Wyoming. One of the key constituents of this mission is the limiting of the impact of animal wastes in our streams and rivers. Due to the large amounts of wastes generated by Concentrated Animal Feeding Operations (CAFO’s), Chapter 2 of the State of Wyoming Water Quality Rules and Regulations (WQRR) requires that CAFO’s that fall into the “large” category are required to seek Wyoming Pollutant Discharge and Elimination System (WYPDES) coverage. Further information can be found in appendix G of the Water Quality Rules and Regulations Chapter 2.

If your operation is determined by the guidelines issued in appendix G of the Water Quality Rules and Regulation to fall into the “large” CAFO category, a site specific water discharge permit will be issued by the WYPDES Permitting Program to the operator. In order for a facility to receive permit coverage, the operator must provide WDEQ with a completed WYPDES discharge permit application and a site specific Nutrient Management Plan (NMP) illustrating the production and utilization of animal wastes generated onsite.

Once permitted, the WYPDES Compliance Program is charged with the mission of monitoring these facilities and determining compliance of the operation with the facility’s WYPDES permit and Chapter 2 of the Wyoming Water Quality Rules and Regulations. Inspection of permits are routinely performed on a 3 year cycle with the exceptions of facilities that have the potential to be major contributors of wastes to Waters of the State of Wyoming, or to facilities that have complaints issued to Wyoming DEQ about unacceptable discharges or conditions. The WYPDES CAFO permit differs from other discharge permits in that it only allows for the discharges of wastes to Waters of The State of Wyoming under very specific conditions depending on the type of livestock confined onsite. These criteria can be found in Chapter 2 of the WQRR appendix G.

This guideline is directed to a formal inspection of a “large” CAFO facility permitted by the Wyoming DEQ WYPDES Program.

Inspection scheduling

In most instances, the inspection process is initiated by the WYPDES Inspector contacting the permit contact. Notice is not required, but usually inspections are scheduled 2 to 3 days ahead of time.

Records review

Once onsite, it is routine to commence the inspection with a review of the permit, NMP, and other associated documents to determine operational status of the inspected facility and compliance with permit and WQRR requirements.

1. Items in the current WYPDES Permit
 - a) Duration of the permit.
 - i. Permits are usually issued for a period of 5 years.
 - ii. Date the permit expires.
 - b) Facility location
 - i. Section, Township, Range
 - ii. Latitude and Longitude in decimal degrees of the facility entrance
 - c) Type and number of animals allowed onsite at any given time.
 - d) Indicates receiving water affected by potential discharges.
 - i. If the facility discharges to waters that are impaired and type of impairment.
 - e) Containment system type and size.
 - f) Storm event type and size that the facility must contain.
 - g) Acreage utilized for waste management.

2. Nutrient Management Plan

The main purpose of a site specific NMP, is to indicate the amount of animal wastes generated through normal production practices and to designate a procedure to utilize the waste in a manner that does not impair the application areas and receiving waters of the CAFO facility. The NMP must be available for review at the time of inspection. Items required in the NMP include:

- a) Waste water and manure calculations
- b) Facility maps indicating production areas, feed storage, waste water retention facilities, manure storage, and clean water diversion structures.
- c) Application area maps with field identification, soil type, and topography
 - i. Must include any waste management measures such as setbacks, physical barriers, filter strips, etc.
- d) Phosphorus and nitrogen leaching indexes for any field designated as potential recipients of animal wastes
- e) Potential crops utilized during the life of the permit

3. Certification of Containment

Due to the containment requirement of the WYPDES CAFO permit under normal operating conditions, to receive permit coverage, the facility must provide proof of the ability to handle the storm event associate by livestock type. In most cases, waste retention facilities are constructed under the guideline issued by the WDEQ Water and Waste Water (W&WW)

program. Certification of completion is issued to the facility when all W&WW requirements are fulfilled. Please have these documents available for review.

Facilities that predate the W&WW program or utilize an existing structure can still certify that the containment requirements of the WYPDES permit are met with as-built drawings and a certification of containment letter from an engineer. Again have these available for review.

4. Required records

The WYPDES CAFO permit record keeping of the facility operation during the duration of the permit, which must be available at the time of inspection. These include:

- a) Weekly log of waste water levels within retention structures
- b) Weekly self-inspections of structures: diversions, berms, ditches
- c) Daily inspections of water lines
- d) Manure and waste water application log
 - i. The amount of manure/waste water applied and the fields applied to
- e) Manure and waste water transfer log
 - i. The amount of manure/waste water transferred to another entity and the contact information of the person receiving the wastes
- f) Precipitation log
- g) Manure and waste water applicator calibration
 - i. This must be performed once during the life of the permit.

Site Evaluation

Upon completion of the review of permit documents and records, an evaluation of the site is generally undertaken by the Inspector. The site evaluation normally consists of three separate areas:

1. Production Area

The site evaluation of the production area is performed to insure that all wastes are contained onsite and that the facility is not discharging under normal operating conditions. The evaluation includes all the confinement areas, feed storage areas, alleys, retention structures, waste water berms and ditches, and clean water diversion structures.

2. Manure and Waste Water Application Area

In most cases, a vast majority of animal wastes are utilized as fertilizer on agricultural ground operated by the CAFO facility. The site evaluation is performed to insure that application of wastes is performed as outlined in the NMP. The inspector confirms that the proper setbacks are observed and that barriers, filter strips, etc. are in place and in good working order.

If the facility transfers all waste, an evaluation of the applied acreage is not performed.

3. Mortality Disposal Area

If mortality disposal is performed onsite, the inspector will visit the disposal area to insure that animal carcasses are handled in the manner outlined in the NMP and the method of disposal is compliant with WDEQ guidelines.

Inspection Termination and Bio-Security

When the site evaluation is complete, the inspection is continued with an exit interview with the permittee at which time any questions that arose during the inspection are discussed.

Once finished, the Inspector is required to decontaminate any clothing that contacted the facility livestock or wastes before entering another facility. Also, the WYPDES CAFO Program has determined it necessary to limit inspections so that a single facility of any type of livestock will be visited in a 24 hour period with certain facility types requiring multiple days between visits. Clothes worn onsite must also be laundered daily.