

April 24, 2013

RESPONSIBLE TRANSPORTATION DOCUMENT

TABLE OF CONTENTS

SECTION	DESCRIPTION OF CONTENTS	COMMENTS
A	Facility History	A brief summary of the uses for the building since being built.
B	Sigourney City Council Meeting at which Responsible Transportation presented their Business Plan and Answered question.	No objections were made to the business plan of Responsible Transportation
C	Keokuk Board of Supervisors Meeting Minutes	Supervisors Presented no Objections
D	Aerial View of Facility and Surrounding Property	No Building Within a 1/2 miles Radius
E	State Historical Society Listing of Historical Places	No Historical Places Listed for the Area Surrounding Responsible Transportation
F	Public Water Supply Operational Application and Permit	Requested and Granted Through the State of Iowa
G	Water Use Permit (previously in name of WLF, renewed for Responsible Transportation	This water use permit only required when over 25,000 gallons of water used daily.
H	Storm Water Discharge General Permit	Issued by the State of Iowa
I	Operational Permit for Wastewater Land Application: Application Included	Issued by DNR
J	Statement from rivers.gov indicating no Wild or Scenic Rivers in Iowa	Operations at Responsible Transportation will not have wild rivers of scenic rivers to potentially negatively affect.
K	Iowa DNR Statement Indicating Threatened and Endangered Species in Keokuk County.	Operations will not have adverse affect on any of the listed species.
L	Chapter 77, Iowa Code Threatened Plant and Animal Species	No adverse affect can be identified by operations at Responsible Transportation
M	US Fish and Wildlife Service Endangered and Threatened Species in Iowa, listing.	Operations at Responsible Transportation should have no adverse affect.
N	Copy of Worksheet Officers are using to Develop a Food Defense Plan	This Program has not yet been completed but is a work in progress
O	Environmental Questionnaire and Disclosure Statement	Required for SBA Loan

April 24, 2013

RESPONSIBLE TRANSPORTATION DOCUMENT

P	Proposed Drug Residue Program for Phenylbutazone; Samples will be submitted to Iowa State University	Blood Drawn and Submitted for Determination of presence of absence of Phenylbutazone
Q	This is a packet of the documents which will be required for each horse received at the Sigourney Plant	APHIS will have a presence at the Establishment verifying transport documentation for the first two weeks of operation at least.
R	Humane Handling Written Program not yet finalized	This will be used to assure and verify compliance with 9 CFR 313
S	Application for Grant of Inspection submitted by Responsible Transportation	Application initially submitted in Dec. 2012. Background Check completed.
T	MOI Posted form EIAO visit to the establishment and review of SSOP, SPS, and HACCP Programs	EIAO's were able to provide ideas for plant management and HACCP Coordinator
U	MOI From Des Moines District Veterinary Medical Specialist regarding his visit and review of company written Humane Handling Program	Dr. King made some suggestions to stimulate plant management thoughts on Humane Handling.

History of Building owned by Responsible Transportation

EXHIBIT A

Company Name: RAWHIDE RANCH BAVARIAN MEAT, INC.
Status: Inactive Filing Date: 11/05/1976
Entity Type: Corporation
File Number: 34082
Filing State: Iowa (IA)
Company Age: 36 Years, 5 Months
Registered Agent: Howard W. Greiner, Rfd 3 Box 188, Sigourney, IA 52591

978 - 2 months Beef Naughton

986 Louis Rich

000 Kraft Food

702 WLF Iowa Porky Greiner

**SIGOURNEY CITY COUNCIL
MEETING: RESPONSIBLE
TRANSPORTATION Q&A**

EXHIBIT B

**CITY OF SIGOURNEY, IOWA
MINUTES OF REGULAR CITY COUNCIL MEETING OF
WEDNESDAY, JANUARY 16, 2013**

The Sigourney City Council met in regular session in the Council Chambers at City Hall on Wednesday, January 16, 2013 with Mayor Miletich presiding and the following Council members answering roll call: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Others present were: Keaton Walker, Chase Greiner and Travis Bouslog, Responsible Transportation; Robin Handy, Sigourney News Review; Don Northup, Water / Wastewater / Pool Supervisor; Brent Gilliland, City Services Director and Building Inspector; Allan Glandon, Police Chief; and Angie Alderson, City Clerk.

Mayor Miletich called the meeting to order at 6:02 p.m. Council member Hornback moved, seconded by Council member McLaughlin, to approve the tentative agenda. Upon the roll being called, the following voted Ayes: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Nays: None. Motion approved.

Council member Ballensky moved, seconded by Council member Conrad, to approve the following items on the consent agenda: minutes from the January 2, 2013 regular Council meeting; accounts payable claims totaling \$20,259.36; Memorial Hall Commission accounts payable claims totaling \$77.98; Library accounts payable claims totaling \$1,944.51; City Clerk and City Treasurer December 2012 financial reports; payroll expenses, other miscellaneous expenses, ACH and monthly transfers for December 2012; reappointment to Planning and Zoning Commission Board of Adjustments - Resolution No. 2013-01-01; liquor license application for Dollar General Store #2244 at 315 North Main Street for Class B Wine Permit (Carryout Wine), Class C Beer Permit (BC) and Sunday Sales; and cigarette/tobacco permit refund to Kum & Go LC in the amount of \$37.50. Upon the roll being called, the following voted Ayes: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Nays: None. Motion approved.

Other City Business: Keaton Walker, [REDACTED] with Responsible Transportation were present to introduce their business to the City Council and explained how they got started. They have purchased the [REDACTED] plant just outside of Sigourney and will process unwanted horses. They are planning to provide a service to horse owners who do not have an option to get rid of their horses. They will receive those horses into their facility and process them. This will be done humanely. They are hoping to have twenty employees by the end of this year. At this point in time they are not planning to use City water, except in an emergency. Mr. Walker, [REDACTED] answered several questions from the Council.

Park and Recreation: The Park and Recreation Committee reviewed the application for pool manager and would like to recommend Debbie Hinnah. They will review the assistant manager applications with the manager to hire at a later date. Council member Conrad moved, seconded by Council member Hornback, to approve hiring Debbie Hinnah as the pool manager for the summer of 2013 at a rate of \$10.00 per hour. Upon the roll being called, the following voted Ayes: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Nays: None. Motion approved.

Council member Conrad explained that at this point we are only hiring lifeguards as the Park and Recreation Committee is considering going to vending machines instead of operating a concession stand and may not need as many employees. Council member Hornback moved, seconded by Council member Johnson, to approve the display ad for the lifeguards. Upon the roll being called, the following voted Ayes: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Nays: None. Motion approved.

Alan Sellers has been the Flag Football and Soccer Director for several years and is asking for an additional \$1,000.00 per year. The current contract would be for Soccer Director for \$2,500.00. He has done this for several years and does a lot to keep these programs running. Council member Johnson moved, seconded by Council member McLaughlin, to approve the Soccer Director contract with Alan Sellers for 2013. Upon the roll being called, the following voted Ayes: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Nays: None. Motion approved.

Council member Conrad reviewed the list of flag football and soccer equipment being requested for the 2013 programs. Council member Conrad moved, seconded by Council member Schultz, to approve the expenditure of \$593.52 for the purchase of flag football and soccer equipment for the 2013 programs. Upon the roll being called,

the following voted Ayes: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Nays: None. Motion approved.

Water and Wastewater: A Water Committee meeting was set for Thursday, January 24th at Noon.

Public Safety: Mayor Miletich explained that there is a property that had received a CDBG housing grant in 1992. The property is being sold and it was brought to the City Clerk's attention that the City's mortgage against the property had never been released or the release had never been recorded. Clerk Alderson found the original mortgage with a note stating the City Clerk at that time thought the release of mortgage had been done and that the City had been paid. Council member Hornback moved, seconded by Council member Schultz, to approve Resolution No. 2013-01-02 authorizing the Mayor and City Clerk to execute release of mortgage(s) relating to previous CDBG Housing Mortgages if terms have been complied with. Upon the roll being called, the following voted Ayes: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Nays: None. Motion approved.

The update report for the energy grant included the windows being installed at City Hall and the VFDs are in at the sewer treatment plant. There are some small things to finish up.

Mayor Miletich shared a letter from Allant Energy with the Council regarding the gradual transformation of street lights to LED lights. This will take approximately seven (7) to nine (9) years. There should be a significant energy savings once this is completed.

Finance: Council member Ballensky moved, seconded by Council member Hornback, to approve the third and final reading to amend Ordinance 2-3-6 Powers and Duties of the Clerk. Upon the roll being called, the following voted Ayes: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Nays: None. Motion approved.

Council member Hornback explained that most of the departments budgeted through the General Fund were asked to take a decrease (most of those a twenty-eight percent decrease). He did not feel the Mayor should have a decrease as she is in the City offices every day. Council member McLaughlin stated that once the decrease is made it will be very hard to reinstate it. Council member Hornback moved, seconded by Council member Johnson, to recommend a twenty-eight percent salary decrease for all Council members with no decrease for the Mayor. Upon the roll being called, the following voted Ayes: Hornback. Nays: Schultz, Johnson, Conrad and McLaughlin. Abstain: Ballensky. Motion failed.

Council member Johnson stated that he would have voted yes had the motion included a decrease in the Mayor's salary as well. He reminded the Council that some tough decisions had to be made this fiscal year regarding the General Fund. The Finance Committee did state they were going to recommend a decrease for the Council members and Mayor. Council member Conrad stated he would have voted no either way and added that the Council does not receive annual increases. Council member Schultz stated that there has not been an increase for the Mayor and Council for at least ten years. Mayor Miletich reminded the Council that they do not get paid for any committee meetings and there are a lot of committee meetings. Council member Schultz had stated at the previous Council meeting that we could look at the possibility of reducing the Council to five (5) members. There are a few six (6) member Councils, but most are five (5). Council member Ballensky had concerns about losing representation if the Council were reduced.

Mayor Miletich explained the services provided by Area 15 Regional Planning Commission. Council member Hornback moved, seconded by Council member McLaughlin, to approve the Resolution No. 2013-01-03 providing for the financial support of the Area 15 Regional Planning Commission. Upon the roll being called, the following voted Ayes: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Nays: None. Motion approved.

City Clerk: Clerk Alderson explained that she used the City's Code of Ordinance to prepare the job description for the Treasurer position. The Council had requested a job description be in place should they decide to fill the position again in the future. Council member Hornback moved, seconded by Council member Conrad, to approve the job description for a City Treasurer position. Upon the roll being called, the following voted Ayes: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Nays: None. Motion approved.

Clerk Alderson stated she had eight (8) to ten (10) applications and had interviewed three (3) applicants and would like to recommend Jessica Dent. She currently lives in Des Moines and is moving here as soon as she has

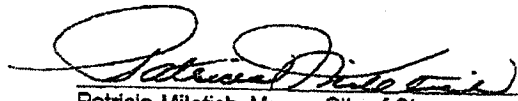
Page -3- Minutes of the Regular City Council Meeting of Wednesday, January 16, 2013

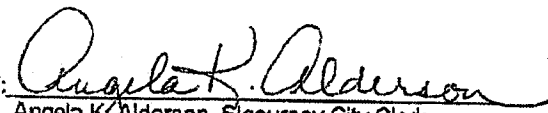
a job. Council member Ballensky moved, seconded by Council member Hornback, to hire Jessica Dent for a part-time position in the City Clerk's office at \$9.25 per hour and after a 60 day successful probationary period increase to \$9.75 per hour. Upon the roll being called, the following voted Ayes: Schultz, Hornback, Ballensky, Johnson, Conrad and McLaughlin. Nays: None. Motion approved.

The February 6, 2013 regular Council meeting will be held at City Hall at 6:00 p.m.

Public Input: There was no public input.

The meeting was adjourned by acclamation at 7:01 p.m.


Patricia Miletich, Mayor, City of Sigourney

ATTEST: 
Angela K. Alderson, Sigourney City Clerk

**MINUTES FROM KEOKUK COUNTY BOARD
OF SUPERVISORS MEETING:
RESPONSIBLE TRANSPORTATION
PRESENTS BUISNESS PLAN**

EXHIBIT C

**BOARD MINUTES
DECEMBER 17, 2012**

The Keokuk County Board of Supervisors met in regular session, Monday, December 17, 2012 in the Board Room of the Courthouse. Present were: Michael Berg, Michael C. Hadley, Daryl Wood and Christy Bates, County Auditor.

8:30 a.m.-Meeting was called to order. Motion was made by Mike Hadley to approve the tentative agenda. Daryl Wood seconded the motion. All ayes and motion carried. Also present was Mendy McAdams, Village Vine.

8:31 a.m.-Public hearing on proposed Keokuk County Ordinance #40 establishing special valuation of wind energy conversion property, adopting assessment schedule with respect thereto and application procedures and timelines for same was held. Also present were John Schroeder, County Attorney; Ron Richmond, GIS/Assessor; Calvin Knowler and Ione Wilkening. John informed Iowa Code provides the following options regarding said matter: Iowa Code Section 441.21 8 b. and c. - provides property tax relief by exempting property for the first five years and Iowa Code Section 427B.26 -provides by ordinance a schedule of taxation based on acquisition cost that increases by 5% following the first year to maximize at 30% on the seventh year and thereafter. Ron stated there is no actual application form to fill out, although interested individuals must submit a letter of intent prior to February 1st to be considered for said assessment schedule. Calvin Knowler requested clarification of the procedure. Ione Wilkening commented she had read about this matter in the paper and was concerned windmills would be placed throughout the County and property owners would be taxed to pay for them. Ron replied that a private individual had requested this matter be investigated. John stated as per statute, 30 days (January 16, 2013 or after) must pass prior to taking formal action on said ordinance. Christy Bates, County Auditor, stated oral or written objections were received.

8:43 a.m.-Minutes of the December 10, 2012 meeting were distributed for reading by the Board. Motion was made by Daryl Wood to approve the minutes of December 10, 2012. Mike Hadley seconded the motion. All ayes and motion carried.

8:45 a.m.-Meeting was held with Andy McGuire, Keokuk County Engineer, regarding the Keokuk County Highway Department. Michael Berg reported gravel is needed on 280th Avenue from the stop sign north near the Tony Gretter residence. Christy Bates shared a compliment from Marion and Reta Streigle regarding quick action and a job well done on a field entrance pipe replacement. Andy informed he and Jerome Winn have been having a discussion regarding finishing off the brush cutting along the 305th route. Board consensus was to allow the additional brush cutting to be paid from the Supervisors' budget.

1. Discussion and possible action on bridge restoration financing agreement for bridge #622105 was held. Engineer McGuire informed John Lane signed the agreement regarding said matter and attached a check for retainage fees. Calhoun-Burns reviewed/approved the correlating bridge rehab diagram. Daryl Wood inquired who will own the bridge. Andy replied the bridge and land would revert back to adjacent deed holders Dave & Michelle Herman and Charles Cassens with easement granted to John Lane to access said bridge. The County would agree to purchase and install the initial signs. If landowners do not agree to this as presented, the bridge will remain in the County's system. Motion was made by Daryl Wood to approve the bridge restoration financing agreement for bridge #622105 with John Lane as submitted and to authorize the Chairman of the Board of Supervisors to sign on behalf of Keokuk County. Mike Hadley seconded the motion. All ayes and motion carried.

2. Review and possible approval of proposal for professional engineering services for bridge #630950 on 170th Street in Section 4 of Washington Township over Coal Creek was held. Andy stated this bridge is located on the Lacey pavement, was built in 1961 and has wood pilings. The County has partnered with the City of What Cheer due to joint jurisdiction. The city bridge funding score indicates whether the bridge qualifies for use of matching farm to market funds. Andy recommended Calhoun-Burns do the preliminary design work. Motion was made by Mike Hadley to approve said engineering services as submitted. Daryl Wood seconded the motion. All ayes and motion carried.

3. Update on agreement for bridge #530635 on 230th Street in Section 6 of Warren Township was held. Andy informed Steve and Donna McAdams have removed the deck stringers and caps making the bridge nonfunctional, therefore now the claim for damages can be paid. Andy further stated he needs to work through the final order for road closure. Board consensus instructed payment for damages from the Supervisors' budget and procedure of the road closure process.

9:15 a.m.-Review and approval of claims was held. Motion was made by Daryl Wood to approve the claim listing dated December 17, 2012 as submitted. Mike Hadley seconded the motion. All ayes and motion carried.

CLAIM DATE: December 17, 2012

AGRILAND FS	733.42
ALL AM PEST CONTROL	65.00
ALLIANT ENERGY	420.38
BANCARD SERVICES	328.86
BARCO MUNICIPAL PRODUCTS	1,935.67
BARRON MOTOR SUPP	508.11
BLAIR, KEITH	14.25
BOND, RICHARD	19.95
BOS, JEANNINE	95.88
C J COOPER & ASSOC	96.00
CARPENTER UNIFORM	383.15
CLOUDBURST9	439.45
COBB OIL CO	24,952.92
COMM MENTAL HEALTH CTR	184.48
COUNTRY HAVEN	122.00
DAHLSTROM, PHYLLIS	98.60
DILL, RITA	65.25
DON'S TRUCK SALES	330.85
DOUDS STONE	13,087.28
ELLIOTT OIL CO	3,461.78
FARMERS SAVINGS BANK	25.00
FERRELL, JAMES	17.10
FIRST RESOURCES	338.58
FLEIG, JONI E	13.50
FRITCHEN, MARTHA	73.38
GATEWAY HOTEL	232.96

GENESIS DEVELOPMENT	1,523.70
GILBERT SEPTIC SERVICE	1,535.00
GILL, SUE	65.25
GRAHAM LAW OFFICE	1,386.25
GREENLEYS CORP	53.97
H & M FARM & HOME	925.34
HADLEY, MICHAEL C	380.25
HAMMES, VERNON	1,452.90
HANSELMAN, BETH	97.70
HILLCREST FAMILY SERV	679.30
HINSHAW TRAILER SALES	195.00
HORRAS, MARILYN	65.25
HOUSE, GEORGE	5.70
HUDSON, LORETTA	72.93
I M W C A	10,743.00
IACCBE	255.00
IDEAL READY MIX CO	337.50
IOWA BRIDGE & CULVERT	1,561.60
ISCTA	20.00
JACK'S CORNER DRUG	175.82
K AND L FOODS	1,399.80
KAPPLE DENTAL ASSOC	101.00
KEMPF, MARGARET	166.36
KENT, CHARLES	171.70
KEOKUK CO HEALTH CTR	173.63
KEOKUK CO HWY DEPT	585.45
KEOKUK CO IMPLEMENT	331.11
KEOKUK CO RECORDER	319.35
KRACHT, KATHRYN	66.60
LISCO/LTDS	320.16
LLOYD MCCONNELL DAVIS	31.00
MCCOY, MELVA L	72.50
MESSERSCHMITT, LAVADA	104.76
MID-AMERICA PUBLISHING	1,302.14
MIKE'S PARTS & SERVICE	116.64
MILLER, PAT SNAKENBERG-	300.99
MOORE, JANICE M	17.95
MOORE, KELLY A	132.00
MOSE LEVY CO	85.26
MULTI-COUNTY OIL CO	2,242.50
NEW DIRECTIONS	1,070.00
NO ENGLISH TELEPHONE	361.84
OFFICE CENTER	272.33
OFFICE DEPOT	19.34
PHELPS AUTO SUPPLY	391.15
PTL THE SHOP	44.40
QUILL CORPORATION	362.08

RENAISSANCE SAVERY HOTEL	215.04
RESERVE ACCOUNT	2,000.00
RICOH USA INC	139.78
RIVER PRODUCTS	7,281.70
SADLER POWER TRAIN	137.66
SANCHEZ, NORMA	75.20
SCHNEIDER CORPORATION	2,715.00
SEEBER, MARGARET	66.15
SHIELD TECHNOLOGY CORP	10,000.00
SIGOURNEY CLEANERS	103.10
SIGOURNEY COMM SCH DST	544.50
SIGOURNEY TRACTOR & IMP	368.59
SIGOURNEY, CITY OF	428.17
SINES, TRAVIS	195.94
SITLER'S SUPPLIES	86.43
SNYDER, ANN	65.25
SO EAST IA CASE MNGT	84.27
STRINGFELLOW, MARILYN	76.08
STROBELS INC	2,186.16
STULL, BEA	104.88
SWANSON, DORTHY JO ANN	72.48
T I P REC	880.79
TENCO INDUSTRIES	536.20
THOMAS, MARCHITA	19.40
THRELKELD-LARSON, VIRGINIA	104.76
TIGERDIRECT INC	193.83
TK CONCRETE	14,628.64
TRUE VALUE	141.71
US CELLULAR	548.42
VERDIN COMPANY	3,211.00
VERIZON WIRELESS	40.01
WALKER'S OFFICE SUPP	261.40
WAPELLO RURAL WATER	164.80
WARREN CO AUDITOR	551.10
WASTE MANAGEMENT	7,099.31
WEBER, JUDITH	110.25
WEST	101.87
WILLIAMS, DIANE	42.68
WILLIAMS, MICHAEL	90.45
WINDSTREAM	2,163.83
WINN J CONSTRUCTION	1,004.88
WOOD, DARYL K	198.45
YATES, MARGARET H	66.15
ZEE MEDICAL	77.70
TOTAL	\$139,321.31

9:25 a.m.-Meeting was held with Keaton Walker [REDACTED] regarding Responsible Transportation update. Keaton informed this began with a business plan to sell the idea of providing a higher quality of life for horses by transporting them humanly and has now progressed to a processing plant for animal consumption. The men commented they have surrounded themselves with great advisors that have helped in the overall process. The plan is to start out with ten (10) employees, five (5) of which are already on staff, with hopes to be operational in three (3) months.

9:35 a.m.-Meeting was held with Jesse Hornback, CPC/General Assistance, regarding monthly Community Services update. Jesse reviewed service authorizations, budget expenditures, fund balances, regional planning, Salvation Army and other related issues.

9:45 a.m.-Meeting with Rick Johnson, River Hills Community Health Center (RHCHC), regarding opening a behavioral health office in Sigourney and possible approval to proceed with planning was held. Also present was Larry Smith, Emergency Management Coordinator. Rick informed he and Jesse Hornback had been discussing the possibility of opening and housing a behavioral health office in the DHS/EOC building that would offer psychiatric and therapist services. Mike Hadley shared concerns regarding said services not being offered in the RHCHC Richland office. The Richland RHCHC has been in operation for 5 ½ years offering medical and dental services and is one (1) of fourteen (14) federally qualified health facility centers. Rick and Jesse stated central placement in Keokuk County would better serve our county residents. Rick initially requested use of two (2) offices spaces, but now would like to increase it to four (4), along with the reception area and conference room to include in the change in federal government scope application. This could revert to moving DHS in time. Larry interjected his concern regarding privacy and mixed cliental. Jesse encouraged partnership with RHCHC and utilization of unused building space for these essential services. Board consensus was to view the DHS/EOC building along with interested parties immediately following the meeting. No decision was made at this time.

10:05 a.m.-Certification of expenses for December 4, 2012 Indian Hills Community College Special Election was held. Motion was made by Daryl Wood to approve the certification of expenses for December 4, 2012 Indian Hills Community College Special Election in the amount of \$2, 170.81 as submitted and to authorize the Chairman of the Board of Supervisors to sign on behalf of Keokuk County. Mike Hadley seconded the motion. All ayes and motion carried.

10:08 a.m.-Acknowledgement of Personnel Report for Bruce Hudson, R.U.S.S. Executive Director, wage change was held. Motion was made by Daryl Wood to acknowledge the Personnel Report for Bruce Hudson, R.U.S.S. Executive Director, wage change from \$58,000 to \$63,000 per year as submitted. Mike Hadley seconded the motion. All ayes and motion carried.

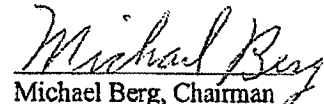
10:10 a.m.-Consideration and possible approval of Talleyrand Bar & Grill Class C Liquor License (LC) (Commercial) application with living quarters, outdoor service and Sunday Sales privileges was held. Motion was made by Mike Hadley to approve said application as submitted, authorize the Chairman of the Board of Supervisors to sign on behalf of Keokuk County and to authorize the Auditor's Office to approve said application on-line with the Alcoholic Beverages Division. Daryl Wood seconded the motion. All ayes and motion carried.

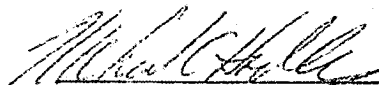
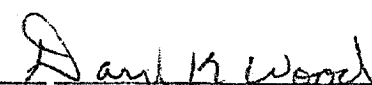
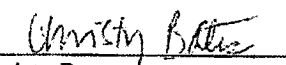
10:15 a.m.-Various board and committee reports were held. Daryl Wood attended RUSS and Crime Commission meetings. Mike Hadley attended an Emergency Planning meeting. Michael Berg attended Iowa Workforce Development, Criminal Justice and Empowerment meetings last week.

10:19 a.m.-Discussion of old/new business and public comment was held. The November ending fund balance report and Pathfinders RC&D monthly update was distributed for the Board to review.

There being no further business, motion to adjourn was made by Michael Berg. Daryl Wood seconded the motion. All ayes and the meeting adjourned at 10:20 a.m. The following individuals proceeded to view the DHS/EOC building: Michael Berg, Mike Hadley, Daryl Wood - Supervisors; Jesse Hornback - CPC/General Assistance; Christy Bates - Auditor and Rick Johnson, RHCHC. Larry Smith was initially present although exited within minutes to attend a meeting in Washington. Board consensus was to investigate said matter further prior to making a formal decision.

The Keokuk County Board of Supervisors adjourned to meet December 24, 2012.


Michael Berg, Chairman
Board of Supervisors

  
Michael C. Hadley Daryl Wood Christy Bates

AERIAL VIEW OF RESPONSIBLE
TRANSPORTATION BUILDING AND
SURROUNDING AREA: NO COMMERCIAL
PROPERTIES AND NO RESIDENCES
WITHIN A .5 MILE RADIUS

EXHIBIT D

As shown on the attached map, the closest occupied house is 0.5 miles from the facility. There are 8 houses within 1 mile of the facility.



**LISTING FROM STATE HISTORICAL
SOCIETY OF IOWA SHOWING NO
HISTORICAL PLACES LISTED ON
NATIONAL REGISTRY IN THE
VICINITY OF RESPONSIBLE
TRANSPORTATION FACILITY**

EXHIBIT E

Information provided by the National Register of Historic Places. The property owned by Responsible Transportation was not found of the list of historic place in Keokuk County, Iowa. The list of historic places in Keokuk County can be found below.



Keokuk County

Property	Address	City	Date Listed
Bruce Goldfish Fisheries	E of Thornburg off IA 22	Thornburg	09/20/1982
Hayesville Independent School	231 Washington Street	Hayesville	08/03/1990
Irwin, John N. and Mary L. (Rankin), House	633 Grand Ave.	Keokuk	10/14/1999
Keokuk County Courthouse	Main Street	Sigourney	07/02/1981
Lancaster School	SE of Sigourney	Sigourney	10/04/1984
Public Square Historic District	Roughly around Keokuk County Court House	Sigourney	4/29/99
Saints Peter and Paul Roman Catholic Church	SE of Harper	Harper	08/06/1985
Sigourney Public Library	203 N. Jefferson Street	Sigourney	05/23/1983
Singmaster C.F. and Mary House	32263 190th Street	Keota vicinity	1/16/98
What Cheer City Hall	Barnes and Washington Sts	What Cheer	08/27/1981
What Cheer Opera House	201 Barnes Street	What Cheer	06/04/1973
White Theodore House	Broadway Street	South English	07/14/1983

**PUBLIC WATER SUPPLY COMPLETED
APPLICATION FOR OPERATION PERMIT
AND OPERATION PERMIT AWARDED TO
RESPONSIBLE TRANSPORTATION**

EXHIBIT F



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIFF, DIRECTOR

February 25, 2013

RESPONSIBLE TRANSPORTATION LLC
ATTN: [REDACTED]
22034 200TH ST
SIGOURNEY, IA 52591

SUBJECT: Public Water Supply Operation Permit Renewal – PWSID# 5475101

Enclosed is the operation permit for RESPONSIBLE TRANSPORTATION LLC, classified as a non-transient non-community public water supply (PWS) by the Iowa Department of Natural Resources (IDNR).

After reviewing the permit, contact an IDNR-certified laboratory and verify that they can provide the testing services required by this operation permit. A copy of the DNR Certified Environmental SDWA Labs has been included with the permit for your use. All communications relating to your PWS should include your PWS identification number (PWSID).

Written sampling plans are required for the coliform bacteria and lead and copper monitoring. These sampling plans are to be kept on file at your facility and are subject to review by the IDNR. Review the attached Lead and Copper Monitoring packet to assist you in choosing the correct sampling sites.

A link to an informational website has been included. This site includes information on how to take samples for bacterial testing, and why it is so important to do so.

http://www.epa.gov/ogwdw000/disinfection/tcr/pdfs/stepguide_tcr_smallsys-3300.pdf

The IDNR is issuing this permit to assign Stage 2 Disinfection Byproduct Rule (DBPR) compliance monitoring for total trihalomethanes (TTHM) and haloacetic acids (HAA5). Please see page 3 of your permit for specific information regarding the monitoring locations and frequency. You are now required to sample at specific locations. If you are unable to use the listed site(s) complete the enclosed "Change of Sampling Site for Disinfection Byproducts" form and return to IDNR. In addition, pay particular attention regarding the labeling of samples submitted to your lab. Your samples must be labeled as Facility ID 950, 951, etc, and Sample Point as DB01, DB02, etc, per your permit. See the attached permit for labeling information specific to your PWS.

Please be advised that this permit does not address additional sampling requirements that may be assigned as a result of monitoring or maximum contaminant level violations. This includes, but is not limited to, "confirmation," "replacement" and "repeat" monitoring requirements.

401 SW 7th St; Suite M; Des Moines, IA 50309-4611;
; Fax 515-725-0348; www.iowadnr.gov

AR0003343

RESPONSIBLE TRANSPORTATION LLC
February 25, 2013
Page 2

After reviewing the permit, feel free to contact me at [REDACTED] or E-mail me at [REDACTED] with questions about monitoring requirements. If you have questions relating to source entry points, sampling plans, or need other assistance, you may contact Field Office 6 in Washington at [REDACTED]

Sincerely,

[REDACTED]

Chris Spoelstra
Environmental Specialist, Water Supply Operations Section

cc:

- ☐ Field Office 6
- ☐ File: PWSID # 5475101

Attachments

OP
☒ [X]
☒ [X]

401 SW 7th St; Suite M; Des Moines, IA 50309-4611;
; Fax 515-725-0348; www.iowadnr.gov

AR0003344

IOWA DEPARTMENT OF NATURAL RESOURCES
WATER SUPPLY OPERATION PERMIT
RESPONSIBLE TRANSPORTATION LLC

Public Water Supply ID: 5475101

RESPONSIBLE TRANSPORTATION LLC
ATTN [REDACTED]
22034 200TH ST
SIGOURNEY, IA 52591

Effective Date: February 25, 2013

Expiration Date: January 31, 2016

The permittee is authorized to operate the public water system identified as RESPONSIBLE TRANSPORTATION LLC, subject to the applicable sections of Iowa Code including Chapter 455B and part 567 of the Iowa Administrative Code (IAC). This system is further subject to the monitoring requirements and general conditions of this permit and appendices when attached.

Appeal: Conditions of this permit may be appealed as provided in 561 IAC chapter 7, adopted by reference by 567 IAC chapter 7. The notice of appeal is required to be in writing and must be postmarked within 30 days of receipt of this permit. The written notice of appeal is required to be mailed to the Director with a copy to the Bureau Chief, Legal Services Bureau, Department of Natural Resources, 502 East 9th Street, Des Moines, Iowa 50319-0034.

Renewal: The permittee must file for renewal of this permit by December 02, 2015. The Iowa Department of Natural Resources (IDNR) will issue an application for renewal prior to this date. It is the permittee's responsibility to ensure that the application is completed and returned to the IDNR. Failure to make proper application or maintain compliance with the requirements of this operation permit may result in legal action pursuant to Iowa Code sections 455B.175 and 455B.191, and 567 IAC Chapter 10 (455B), including the possible assessment of monetary penalties.

FOR THE DIRECTOR,

By: [REDACTED] Date: February 25, 2013

cc: Field Office 6

File: PWSID:5475101, RESPONSIBLE TRANSPORTATION LLC

RESPONSIBLE TRANSPORTATION LLC

ATTN [REDACTED]
22034 200TH ST
SIGOURNEY, IA 52591

IOWA DEPARTMENT OF NATURAL RESOURCES
WATER SUPPLY OPERATION PERMIT
RESPONSIBLE TRANSPORTATION LLC

Date: February 25, 2013

Public Water Supply ID: 5475101

Responsible Transportation Llc is classified as a non-transient non-community public water supply with a groundwater source. You must have a certified operator in direct responsible charge of the treatment to have a Water Treatment Grade 1 Certification and of the distribution system to have a Water Distribution Grade 1 Certification. The current operating period is defined as January 1 to December 31. In case your operating period is different than these dates, you must notify the IDNR immediately.

The water supply must sample at the locations and frequencies specified in this permit during periods of normal operation and representative of all water sources and treatment.

Distribution System Monitoring Requirements

The following samples must be taken throughout the distribution system, according to written sampling plans, and analyzed by a laboratory certified by the IDNR.

Facility ID: 950

Distribution System Name : DISTRIBUTION SYSTEM

ANALYTE	MONITORING FREQUENCY	SAMPLE PERIOD
Colliform Bacteria	1 sample every quarter	
Lead and Copper	5 samples for 6 months	January 1 to June 30, 2013
Lead and Copper	5 samples for 6 months	July 1 to December 31, 2013

Source Entry Point Monitoring Requirements

The following samples must be taken at the source entry point and analyzed by a laboratory certified by the IDNR

Facility ID: 01

Source Entry Point Name: SEP FRM WELLS #2, 3, & 5 (PARALLEL)

ANALYTE	MONITORING FREQUENCY	SAMPLE PERIOD
Inorganic (IOC) Chemicals	1 sample every 9 years	July 1 to September 30, 2013
Nitrate	1 sample every year	July 1 to September 30
Synthetic (SOC) Chemicals	1 sample every 6 years	October 1 to December 31, 2013
Volatile (VOC) Chemicals	1 sample every 6 years	October 1 to December 31, 2013

Note: Samples may be collected before the sample period specified, for monitoring frequencies of a year or greater. However, the interval between samples must not exceed the frequency. If a yearly 3rd quarter sample is collected early, for example in the 2nd quarter, the next yearly sample must be collected before the end of the 2nd quarter of the next year.

IOWA DEPARTMENT OF NATURAL RESOURCES
WATER SUPPLY OPERATION PERMIT
RESPONSIBLE TRANSPORTATION LLC

Date: February 25, 2013

Public Water Supply ID: 5475101

Stage 2 Disinfectants and Disinfection Byproducts Rule (DBPR)

Stage 2 Disinfectants and Disinfection Byproducts Rule (DBPR) monitoring requirements are based on your source water type and system population. Compliance with this rule is based on each individual distribution system sampling location. If an individual location is sampled quarterly, then compliance is based on the average of the analytical results for the previous four calendar quarters.

A total of 1 samples must be collected per monitoring period, according to the approved sampling plan. Each sample from each location must be analyzed for both Total Trihalomethanes (TTHM) and Haloacetic Acids (HAA5). Samples must be collected at the following points and frequencies:

Sample location	Facility ID	Sample Point ID	Monitoring Frequency
OFFICE RESTROOM	950	DB01	every year in July

Monthly Operation Report (MOR) Self-Monitoring Requirements

Monthly records of operation must be signed by the certified operator in direct responsible charge or their designee, maintained at the system for a period of five years, and available for IDNR review. Analysis of analytical parameters by a laboratory certified by IDNR is not required; however, a reliable field test kit or laboratory method must be used. Monthly Operation Report Forms may be obtained by contacting Field Office 6 at 319-653-2135. When IDNR notification is required, use this same field office number. During evenings, weekends, and holidays, notify the IDNR through the 24-Hr Emergency Response Unit at 515-281-8694.

When indicated in the section(s) below, the permittee must report the signed results of the self-monitoring in an approved format to Field Office 6 in Washington within 10 days after the end of each month.

Routine Monitoring

Any parameter with an "X" in the report column below, must be submitted to the IDNR field office monthly as prescribed above. All parameters, whether reported to the field office or not, must be maintained at the system.

PARAMETER	FREQUENCY	LOCATION	REPORT	COMMENTS/RANGES
Pumpage or Flow	1/Week	Source Entry Point		
Pumpage or Flow	1/Week	Raw Water		
Static Water and Pumping Levels	1/Month	Each Active Well		

IOWA DEPARTMENT OF NATURAL RESOURCES
WATER SUPPLY OPERATION PERMIT
RESPONSIBLE TRANSPORTATION LLC

Date: February 25, 2013

Public Water Supply ID: 5475101

Mandatory Treatment Objectives and Operational Restrictions

You are required to adhere to the following treatment or restriction provisions. All parameters listed below must be monitored and reported to the IDNR Field Office. The permittee must report the signed results of the self-monitoring in an approved format to Field Office 6 in Washington within 10 days after the end of each month. You are required to achieve operational ranges when specified. You must notify the IDNR field office before any planned deviations and within 24 hours of any emergency deviations. Such circumstances are also to be reflected in the monthly operational reports.

Restricted Use Source (Consecutive Connection

**Consecutive Connection from Wapello
RWA & City of Sigourney**

You must notify the IDNR field office before any planned use, within 24 hours of any emergency use, and where use of the source exceeds 30 days per year. Upon notification by the PWS, the IDNR will assign appropriate monitoring and other requirements.

PARAMETER	FREQUENCY	LOCATION	COMMENTS/RANGES
Pumpage or Flow, each Connection	1/Day	Connection Point	

Chlorination Requirements (Field Office Report)

You are required to provide chlorination and ensure that the chlorine concentration or residual in the finished drinking water is continuously maintained above at least 0.3 mg/L free chlorine or 1.5 mg/L total available chlorine throughout the distribution system, except in low use areas.

PARAMETER	FREQUENCY	LOCATION	COMMENTS/RANGES
Disinfectant Residual	1/Day	Distribution System	
Disinfectant Residual	1/Day	Source Entry Point	
Disinfectant, Quantity Used	1/Day	Day Tank / Scale	
Pumpage or Flow, each Treatment	1/Day	Treatment Point	

Corrosion Control Treatment

You are required to provide Corrosion Control Treatment to ensure that the lead and copper concentrations at drinking water taps are continuously maintained below the 90th percentile action levels of 0.015 mg/L for lead and 1.3 mg/L for copper.

PARAMETER	FREQUENCY	LOCATION	COMMENTS/RANGES
Phosphate, Quantity Used	1/Week	Day Tank / Scale	
Phosphate, as PO ₄	1/Week	Source Entry Point	

Disinfection By-Product Requirements (DBPR)

Community and nontransient noncommunity public water supplies that add a chemical disinfectant or which provide water that contains a chemical disinfectant must monitor for the following to determine compliance with disinfection byproducts requirements. Total chlorine residuals must be used in the Maximum Residual Disinfectant Level (MRDL) calculations.

PARAMETER	FREQUENCY	LOCATION	COMMENTS/RANGES
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IOWA DEPARTMENT OF NATURAL RESOURCES
WATER SUPPLY OPERATION PERMIT
RESPONSIBLE TRANSPORTATION LLC

Date: February 25, 2013

Public Water Supply ID: 5475101

Calculated MRDL (Monthly Average)	1/Month	Distribution System	Calculated each calendar month from the total chlorine residuals measured with the routine and repeat coliform bacteria samples.
Calculated MRDL (Running Annual Average)	1/Quarter	Distribution System	Calculated each calendar quarter from the previous 12 monthly MRDL total chlorine residual averages.
Disinfectant Residual	At Sampling	Distribution System	The system must measure and record chlorine residuals on the sample data sheet when sampling in the distribution system for routine and repeat coliform bacteria samples.

IOWA DEPARTMENT OF NATURAL RESOURCES
WATER SUPPLY OPERATION PERMIT
RESPONSIBLE TRANSPORTATION LLC

Date: February 25, 2013

Public Water Supply ID: 5475101

GENERAL PERMIT CONDITIONS

1. ADMINISTRATIVE RULES

Rules of the IDNR which govern your facility operation, in connection with this permit, are published in 567 Iowa Administrative Code (IAC) Chapters 40, 41, 42, 43, and 81.

2. NOTICE OF CHANGED CONDITIONS

You are required to report any changes in existing conditions or information on which this permit is based. If any modification of, addition to, or construction of this water system is made, you must first obtain a written construction permit from the IDNR, in accordance with 567 Chapters 40, 41, and 43.

3. PERMIT MODIFICATION, SUSPENSION, OR REVOCATION

- a. This permit may be modified at any time as a result of changes to the Iowa Administrative Code.
- b. This permit may be modified due to changes in the conditions or information on which this permit is issued.
- c. This permit may be modified to include a compliance schedule.
- d. This permit may be modified, suspended, or revoked for causes specified in 567 IAC 43.2(8).

4. INSPECTION OF PREMISES, RECORDS, EQUIPMENT, AND METHODS

You are required to permit authorized IDNR personnel to survey and inspect any construction, operation, and records of your water supply system in accordance with Iowa Code, section 455B. 174, and 567 IAC 42.4(3)"a" and 42.5(1)"g" and 567 Chapter 44.

5. OPERATION AND MAINTENANCE

All facilities and control systems must be operated as efficiently as possible and maintained in good working order in accordance with 567 IAC Chapter 43. A sufficient number of staff, adequately trained and knowledgeable in the operation of your facility, must be retained to achieve compliance with the terms of this permit.

6. REPORTING, PUBLIC NOTIFICATION, AND RECORDKEEPING REQUIREMENTS

- a. You are required to report all test, measurement, or analytical results to the IDNR in accordance with 567 IAC 42.4(1)"a". This must include the reporting of all positive detects within the same analytical series.
- b. You are required to report to the IDNR within 48 hours any violation of the drinking water regulations or monitoring requirements in accordance with 567 IAC 42.4(1)"b".
- c. You are required to notify the public of any violation of the drinking water regulations or monitoring requirements in accordance with 567 IAC 42.1(455B).
- d. Within 10 days of notifying the public, you are required to provide proof of such action to the IDNR in accordance with 567 IAC 42.4(1)"c".
- e. You are required to maintain records of analyses, of actions to correct violations of any of the drinking water regulations, of correspondence, and of permits for periods of 5 to 12 years depending on the nature of the records, in accordance with 567 IAC 42.5(1).

7. TRANSFER OF TITLE, CHANGE IN OPERATION

If title to your facility or any part of it is transferred, the new owner shall be subject to this permit. You are required to notify the new owner of the requirements of this permit in writing within 30 days to such transfer of title. The Director of the IDNR must be notified in writing within 30 days of such transfer or of any other change in conditions identified in the permit application (567 IAC 43.2(455B)).

8. SEVERABILITY

If any provision or application of any provision to any circumstances is found to be invalid by the IDNR or by a court of law, all other provisions and conditions shall remain effective.

9. APPLICATION OF OTHER AUTHORITY

This permit does not relieve you of the responsibilities to comply with all local, state, and federal laws, ordinances, regulations, or other legal requirements applying to the operation of your facility.

FACILITY ID SUMMARY

RESPONSIBLE TRANSPORTATION LLC

PWSID 5475101

Facility ID	Facility Name	Status
Facility Type : Distribution System		Type Code : DS
950	DISTRIBUTION SYSTEM	Active
Stage 2 DBPR Sample ID Description		Status
DB01 OFFICE RESTROOM		A
DB02 ROOM 112A - PACKAGING		I
Facility Type : Source/Entry Point		Type Code : SS
01	S/EP FRM WELLS #2, 3, & 5 (PARALLEL)	Active
02	SS FROM SIGOURNEY WS, IA5475050	Inactive
03	SS FROM WAPELLO RWA, IA9000742	Inactive
Facility Type : Well		Type Code : WL
WL01	WELL # 1 (1977) PLUGGED Well Tag ID: 1060851	Inactive
WL02	WELL # 2 (1977) Well Tag ID: 1060487	Active
WL03	WELL # 3 (1977) Well Tag ID: 1060488	Active
WL04	WELL # 4 (1986) FIRE PROTECTION ONLY. Well Tag ID: 1060490	Inactive
WL05	WELL # 5 (1986) Well Tag ID: 1060489	Active
Facility Type : Consecutive Connection		Type Code : CC
CC01	CC FROM SIGOURNEY WS, IA5475050	Inactive
CC02	CC FROM WAPELLO RWA, IA9000742	Inactive
Facility Type : Treatment Plant		Type Code : TP
TP01	TREATMENT PLANT	Active
Facility Type : Storage		Type Code : ST
ST01	ABOVE GROUND STORAGE	Active
ST02	ABOVE GROUND STORAGE	Active



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

December 28, 2012

RESPONSIBLE TRANSPORTATION LLC

ATTN: [REDACTED]

22034 200TH ST

SIGOURNEY, IA 52591

SUBJECT: Water Supply Operation Permit Application, PWSID 5475101

The Iowa Administrative Code requires that all public water supply systems have an operation permit issued by the director. These rules require owners of public water systems to submit an application for a permit. Permits are effective for three years and serve as a direct link between each public water system and the Department by providing each water manager with the specific monitoring, reporting, and water quality standards applicable to that system.

Our records indicate that Responsible Transportation Llc is a Non-Transient Non-Community public water system. Iowa Administrative Code defines a Non-Transient Non-Community water system as one which has at least fifteen (15) service connections or regularly serves an average of at least twenty-five (25) individuals at least sixty days out of the year. If you believe your system does not satisfy this definition, please contact the Department and request a status change.

Your permit application is enclosed. Please return the completed application, postmarked no later than February 28, 2013, to the following address:

Iowa Department of Natural Resources
Water Supply Section
401 SW 7th St. Suite M
Des Moines, IA 50309-4611

If you have questions regarding the permit program or information required on the application, please contact [REDACTED]

Sincerely,

[REDACTED]

[REDACTED]

Environmental Specialist Senior, Water Supply Operations Section

cc: FILE: Responsible Transportation Llc, PWSID 5475101

**Iowa Department of Natural Resources
PUBLIC WATER SUPPLY OPERATION PERMIT APPLICATION**

Public Water Supply Name:

RESPONSIBLE TRANSPORTATION LLC

PWSID#: 5475101

Field Office 6

Owner / Authorized Agent Address	
RESPONSIBLE TRANSPORTATION LLC ATTN [REDACTED] 22034 200TH ST SIGOURNEY, IA 52591	Phone Number: [REDACTED] FAX Number: [REDACTED] E-mail Address: [REDACTED]
Operator Address	
Same as Owner	

PWS Type: Non-transient non-community

County: KEOKUK

Return the completed application by: 02/28/2013

CERTIFICATION	
I certify under penalty of law that I am the owner or the authorized agent of the owner and I have personally examined, and am familiar with the information submitted in this document, and I believe that the information is true, accurate, and complete.	
Name (print or type) _____	Title _____
Signature _____	Date _____
This certification must be executed by the official named below:	
(1) Corporation: the principal executive officer or at least the level of vice-president	
(2) Partnership: a general partner	
(3) Sole Proprietorship: the proprietor	
(4) Municipal, state, or other public facility: the principal executive officer or the ranking elected official	

OPERATOR CERTIFICATION	
Operator in Charge: _____	Operator Employment Date: _____
Operator ID #: _____	_____

TREATMENT	
(complete this section if you treat the drinking water provided to the public) Check one or more, as appropriate	
DISINFECTION (X) Chlorination () Other Disinfection: _____ STABILIZATION (corrosion control) (X) Phosphate Compounds () pH Adjustment () Other: _____ FLUORIDE ADDITION () Fluoride Compounds SURFACE WATER TREATMENT () Coagulation () Sedimentation () Filtration	SOFTENING () Water Softener (ion exchange) () Lime, Excess Lime or Soda Ash IRON AND MANGANESE TREATMENT () Iron and/or Manganese Removal () Phosphate Addition to Control Iron TASTE AND ODOR CONTROL () Aeration () Activated Carbon () Other: _____ OTHER TYPE OF TREATMENT () _____

GENERAL

POPULATION		(to be completed by all water supply applicants)
Residential		Residential population is calculated from the most recent official census.
Non-transient	25	Non-transient populations are the average daily number of people served on a routine basis at least six months each year (employees, students, etc.).
Transient		Transient populations are the average daily number of people served on a non-routine basis (customers, visitors, etc.).
Number of Metered Service Connections	3	Number of Non-Metered Service Connections
If open on a seasonal basis, indicate open and close dates:		
OPEN (month/day) 		CLOSE (month/day)
STORAGE CAPACITY (gallons) <small>(do not include pressure tank capacity)</small>	AVERAGE DAILY USAGE, ACTUAL OR ESTIMATE (gallons/day)	
30,000 (2 above ground storage tanks @ 15,000 each)	8,000	
MAXIMUM PRODUCTION CAPACITY IN 24 HOURS, ACTUAL OR ESTIMATE (gallons)	MAXIMUM DAILY USAGE, ACTUAL OR ESTIMATE (gallons/day)	
20,000	16,000	
IF YOU SELL WATER TO OTHER PUBLIC WATER SYSTEMS, PLEASE LIST	IF YOU PURCHASE WATER FROM OTHER PUBLIC WATER SYSTEMS, PLEASE LIST AND INDICATE TYPE OF USE	
	City of Sigourney () Primary (X)	
	Wapello RWA () Primary (X) Standby	
For Rural Water Systems Only:		
Miles of Pipe 		

SECTION I

SURFACE WATER SOURCE <small>(only if necessary)</small>		
Type of source: () River () Lake () Impoundment	Provide data on raw water pumps, if known:	
Name of source (river, lake, etc.)	Total Capacity (gpm)	Total Number

SECTION II

GROUNDWATER SOURCE <small>(only if necessary)</small>							
Well Name	Legal Description of Well Location	Type of Well (drilled, dug or artesian)	Well Number	Well Depth (feet)	Well Use (circle one)	Pump Capacity (gal/min)	Date of Construction
#2 Central Well	T76N R11W Sec. 30 NW NW NW NW NE	Drilled	39511	123	Primary Standby	5	January 1, 1977
#3 East Well	T76N R11W Sec. 30 NW NW NW NW NE	Drilled	39512	123	Primary Standby	30	January 1, 1977
#5 West Well	T76N R11W Sec. 30 NW NW NW NW NW	Drilled	28312	123	Primary Standby	20	June 17, 1985
#4 Fire Protection	T76N R11W Sec. 30 NW NW NW SW NW	Drilled	27990	842		400	June 11, 1985

STATE OF IOWA WATER USE PERMIT
RENEWAL APPLICATION PREVIOUSLY
IN THE NAME OF WEST LIBERTY
FOODS, NOW AWARDED TO
RESPONSIBLE TRANSPORTATION
(This permit required when over
25,000 gallons used each day)

EXHIBIT G

From: [REDACTED]
Sent: Tuesday, April 16, 2013 3:41 PM
To: [REDACTED]
Subject: RE: 5907 Water Use Permit Renewal

Thank you. I have a backlog of renewals and this may not get issued until next month. In the meantime, consider this email confirmation that this permit is active and in compliance.

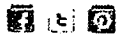
Please direct future correspondence regarding water use to [REDACTED]

[REDACTED] Water Use Allocation Compliance & Enforcement



Iowa Department of Natural Resources
515.725.0341 | [REDACTED]
401 SW 7th St., Ste M | Des Moines, IA 50309-4611

WWW.IOWADNR.GOV



Leading Iowans in Caring for Our Natural Resources.

From: [REDACTED]
Sent: Tuesday, April 16, 2013 2:28 PM
To: DNR Wateruse
Subject: 5907 Water Use Permit Renewal

Please find attached our application for the renewal of our water use permit.

Thank you.

[REDACTED]
Chief Operating Officer
Responsible Transportation LLC
[REDACTED]
[REDACTED]



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

WATER USE PERMIT RENEWAL APPLICATION			
Permit number	5907	Expiration date: 09/19/2011	The 2013 Annual Water Use Fee for this permit was paid on 12/03/2012.
Property located in Section 30 Township T76N Range 11W in KEOKUK County, Iowa. Maximum quantity of 18.25 Million Gallons per Year			
	Who will be the Permit Holder? <ul style="list-style-type: none">• reports water use• receives all other correspondence	Who is the current Property Owner?	(optional) Authorized Representative
Who pays annual permit fee?	Yes No	Yes No	Yes No
Business Name	Responsible Transportation	Responsible Transportation	
First name			
Last name			
Address 1	22034 200 th St	22034 200 th St	
Address 2			
City	Sigourney	Sigourney	
State	Iowa	Iowa	
Zip	52591	52591	
E-mail			
Primary Phone			
Secondary phone			
Tertiary phone			
Fax number			

Water Supply Engineering Section, 401 SW 7th Suite M, Des Moines, IA 50309-4611
Phone: 515-725-0282 Fax: 515-725-0348

AR0003357

WATER USE PERMIT RENEWAL APPLICATION						
SUMMARY						
Complete this section based on current or currently permitted water use. Attach additional pages if necessary.						
Water withdrawal site(s):	Quarter	Quarter	Section	Township	Range	County
Water use location(s):	Quarter	Quarter	Section	Township	Range	County
Water Source Type:			Groundwater		Surface Water	
Number of withdrawal points/intakes:						
Water source(s):			Aquifer name(s)		Surface water body name(s)	
Total annual permitted water use amt:			<input type="checkbox"/> acre-feet <input type="checkbox"/> gallons		<input type="checkbox"/> acre-feet <input type="checkbox"/> gallons	
Purpose(s) water used for (check all that apply):						
<input type="checkbox"/> Municipal / Public <input type="checkbox"/> Industrial <input type="checkbox"/> Commercial <input type="checkbox"/> Recreational <input type="checkbox"/> Quarry operations <input type="checkbox"/> Irrigation Total number of acres irrigated: <input type="checkbox"/> Other (indicate purpose): Crop type(s):						
SECTION A: Water Use Permit Renewal						
If conditions (e.g., number and location of wells, pumping rate, requested water allocation) have not changed from those described on your current permit, check the box below and return this signed form to the DNR. <input checked="" type="checkbox"/> Please RENEW the water use permit WITHOUT changes.						

Signature: _____

Date: 4/16/13

SECTION B: Water Use Permit Modification-if necessary
If conditions (e.g., number and location of wells, pumping rate, requested water allocation) have changed from those described on your current permit, check the box below and return this signed form to the DNR. The department will send you the appropriate form for requesting a simultaneous modification and renewal.
<input type="checkbox"/> Please send me the necessary form so that I can indicate the changes that need to be made in the water use permit, which must be simultaneously RENEWED and MODIFIED. The fee to modify this permit is \$350.00.

RECORD COPY

File Name _____

Senders Initials _____

IOWA DEPARTMENT OF NATURAL RESOURCES

WATER USE PERMIT

Permit issued to:

██████████
22034 - 200th Street
Sigourney, IA 52591

Permit Number: 5907-MR2

Effective: September 20, 2001

Expires: September 19, 2011

The permittee is authorized to:

withdraw water from 3 existing Mississippian wells, 103 to 123 feet deep, on land generally described as the NW ¼ of Section 30, T76N, R11W, Keokuk County, Iowa, in the maximum quantity of 18.25 million gallons per year at a maximum rate of 55 gallons per minute throughout each year for use in the operation of a meat processing plant on said land.

This authorization to withdraw water has been granted pursuant to the provisions of Part 4 of Division III of Chapter 455B, Code of Iowa, and Chapters 50, 51, and 52 of Part 567, Iowa Administrative Code, and is further subject to the general permit conditions within this permit.

Conditions of this permit may be appealed as provided in rule 567--50.9, Iowa Administrative Code. Appeal must be in writing and must be received at the Department of Natural Resources; Henry A. Wallace Building; 900 East Grand; Des Moines, Iowa 50319-0034 within thirty days of the date of the certification of the mailing of the permit.

FOR THE DIRECTOR:

By: ██████████
(tbv)

Date Executed: September 20, 2001

c: Field Office No. 6
CON 3-9, #5907

CERTIFICATE OF MAILING

On the date shown below, a copy of the foregoing permit was mailed to the permittee and to each person entitled to receive a copy as provided by rule 567--50.8(2), Iowa Administrative Code

████████████████████

20,886

AR0003359

GENERAL PERMIT CONDITIONS

1. Permittee shall maintain accurate and up-to-date records of water use from said sources and submit them annually to the department. Additional records on pumping rates from said sources, water levels in said wells and other data related to the regulation of this use of water shall be maintained and submitted as directed by the department.
2. Permittee shall be responsible for securing such other permits or approvals as may be required by this department, federal, or local governmental agencies for the operation of said meat processing plant or the discharge of water or other materials due to this operation.
3. Permittee is responsible for compliance with all applicable provisions of state law and the rules and regulations of this department and of federal and local health and water pollution control agencies in the operation of the said plant and in the disposal of its wastes.
4. Permittee shall construct, maintain, and monitor observation wells, as directed by the department to define the effects of permittee's water withdrawals on groundwater resources or on other water users who might be affected by the withdrawals authorized herein.
5. Once each spring prior to March 31, the permittee shall be responsible for accurately measuring the distance(s) to water (static water level) from the access port in all permitted wells. The distance to water shall be submitted to the department annually as part of the records of water use.
6. Existing wells shall not be replaced without notifying the Iowa Department of Natural Resources. Changes to the location, depth, source aquifer, or other physical features of said wells may require that this permit be modified to accommodate the changes.
7. Permittee shall submit to the department within 90 days of being notified by the department, or no later than the expiration date of this permit, whichever first occurs, a plan for implementing routine day-to-day water conservation measures and for implementing emergency water conservation measures during periods of water shortage. Until such a plan has been submitted to and approved by the department, permittee shall implement those emergency water conservation measures determined to be necessary by the department pursuant to Iowa Code Sections 455B.265 and 455B.266.
8. This permit supersedes Water Use Permit No. 5907-R1.

CAVEAT

Permittee is advised that pursuant to Section 455B.271, Code of Iowa, the authority to withdraw water provided by this permit may be modified, canceled or suspended in case of any breach of the terms or conditions herein, in case of any violation of state law pertaining to the permit, or if found necessary to prevent substantial injury to private or public interests.

SUMMARY REPORT

Permittee has applied to renew an existing permit that presently authorizes the requested withdrawals of water. The requested use of water conforms to the relevant criteria in Part 4 of Division III of Chapter 455B, Code of Iowa, and Chapter 52 of Part 567, Iowa Administrative Code. The department has received no allegations of public or private damage resulting from the use of water authorized under the predecessors to this permit since the original permit was granted.

STATE OF IOWA STORM WATER
DISCHARGE GENERAL PERMIT

EXHIBIT H



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

January 3, 2013

[REDACTED]
RESPONSIBLE TRANSPORTATION, LLC
22034 200TH ST.
SIGOURNEY, IA 52591

Re: Acknowledgement of Receipt of Permit Renewal Fee Payment
DNR Authorization Number: IA - 5609 - 5432
Facility Name and Location: RESPONSIBLE TRANSPORTATION, LLC SIGOURNEY, IA

Dear [REDACTED]

Enclosed you will find a revised discharge authorization sheet for your storm water NPDES General Permit. You will notice that your storm water discharge to be covered under the general permit has been authorized for additional year(s). The revised date is shown on the lower portion of the cover sheet following the phrase 'Coverage Provided Through.' If any of the information on this cover sheet is incorrect or if you have any questions, please contact me at [REDACTED]

Also enclosed is a separate sheet regarding the contact person for storm water correspondence for your project or facility. Please update our contact person sheet if any information on that sheet is incorrect. Send any revisions to:

Storm Water Coordinator
Iowa Department of Natural Resources
502 E. 9th Street
Des Moines, IA 50319-0034

Sincerely,

[REDACTED]
NPDES Section

Enclosure(s): Contact Information Sheet; Permit Authorization Sheet

File No. CON 11 - 34 -- 5609
IDNR Field Office # 6

DEPARTMENT OF NATURAL RESOURCES / DES MOINES, IOWA 50319 / 515-281-5145 / FAX 515-281-8895

AR0003363

DEAR STORM WATER DISCHARGER:

We are using the following contact person and address for correspondence relating to the storm water discharge general permit. If you prefer that correspondence be sent elsewhere, please make the appropriate changes below and return this form to us so that we can update our records.

Mail changes to: Storm Water Coordinator
Iowa Department of Natural Resources
502 E. 9th St.
Des Moines, IA 50319-0034

DNR Permit Number: IA - 5609 - 5432

Contact Person: [REDACTED]

Company Name: RESPONSIBLE TRANSPORTATION, LLC

Address: 22034 200TH ST.

SIGOURNEY, IA 52591

Telephone: [REDACTED]



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

DEPARTMENT OF NATURAL RESOURCES
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
NOTICE OF GENERAL PERMIT COVERAGE UNDER
GENERAL PERMIT NO. 1

STORM WATER DISCHARGE ASSOCIATED WITH INDUSTRIAL ACTIVITY

This notice of general permit coverage for a storm water discharge associated with industrial activity is issued pursuant to the authority of section 402 (b) of the Clean Water Act (U.S.C. 1342(b)), Iowa Code 455B.174, and subrule 567--64.4(2), Iowa Administrative Code. A Notice of Intent has been filed with the Iowa Department of Natural Resources that this storm water discharge complies with the terms and conditions of NPDES General Permit No. 1. Authorization is hereby issued to discharge storm water associated with industrial activity as defined in Part VIII of the Iowa Department of Natural Resources NPDES General Permit No. 1 in accordance with the terms and conditions set forth in the permit.

Owner: RESPONSIBLE TRANSPORTATION, LLC
22034 200TH ST.
SIGOURNEY IA 52591
[REDACTED]

Permit Coverage Issued To:

RESPONSIBLE TRANSPORTATION, LLC
22034 200TH ST.
in SIGOURNEY, KEOKUK COUNTY
located at

1/4 Section	Section	Township	Range
NW	30	76	11W

Coverage Provided Through: 11/19/2013
Standard Industrial Classification Code: 2011
NPDES Permit Discharge Authorization Number: 5609 - 5432
Discharge Authorization Date: 11/19/2002

DEPARTMENT OF NATURAL RESOURCES / DES MOINES, IOWA 50319 / 515-281-5145 / FAX 515-281-8895

AR0003365

**DEPARTMENT OF NATURAL RESOURCES
OPERATION PERMIT FOR WASTEWATER
LAND APPLICATION SYSTEM**

EXHIBIT I

Iowa Department of Natural Resources

Operation Permit for a Land Application System

PERMITTEE:

Responsible Transportation, LLC
22034 200th Street
Sigourney, IA 52591

IDENTITY AND LOCATION OF FACILITY:

Responsible Transportation
NW ¼ of Section 30, T76N, R11W
Keokuk County, Iowa

OPERATION PERMIT NUMBER: 5475100

DATE OF ISSUANCE: March 1, 2013

DATE OF EXPIRATION: February 28, 2018

Land Application System:

No waste discharge into waters of the
State of Iowa shall be caused, allowed
or permitted from the wastewater
land application system.

**YOU ARE REQUIRED TO FILE FOR RENEWAL
OF THIS PERMIT BY:** September 1, 2017

This permit is issued pursuant to the authority of Iowa Code section 455B.174 and rule 567--64.3, Iowa Administrative Code. You are authorized to operate the disposal system in accordance with the terms set forth in this permit.

You may appeal any condition of this permit by filing a written notice of appeal and request for administrative hearing with the director of this department within 30 days of your receipt of this permit.

Any existing unexpired Iowa operation permit previously issued by the department for the facility identified above is revoked by the issuance of this Iowa operation permit.

DESCRIPTION

Wastewater from a meat processing facility is treated in a lagoon system consisting of an anaerobic lagoon and two aerobic storage lagoon cells. The treated wastewater is disposed of by land application using a center pivot irrigation system. The 40-acre land application area is in the NW ¼ of Section 30, T76N, R11W, Keokuk County, Iowa. No discharge to a water of the state from the storage lagoon or the land application area is permitted.

FOR THE DEPARTMENT OF NATURAL RESOURCES

By _____

Environmental Specialist
NPDES Section
ENVIRONMENTAL SERVICES DIVISION

Facility Name: Responsible Transportation
Iowa Operation Permit Number: 5475100

OPERATING REQUIREMENTS FOR THE LAND APPLICATION SYSTEM FOR DISPOSAL OF WASTEWATER

The permittee is authorized to operate the disposal system described on page 1 in accordance with the conditions set forth below:

1. The permittee shall report to this department any direct discharge of waste into a watercourse from the land disposal operations. Such notification shall be given by telephone call to our Washington office at (319) 653-2153 within twenty-four (24) hours of the discharge occurrence. In addition, the permittee shall provide the following information, in writing, within five (5) days of such discharge.
 - a) A description of the cause of discharge;
 - b) The period of discharge, including the exact dates and times of discharge. If the discharge has not ceased, notification shall include the anticipated duration of the discharge.
 - c) The estimated volume of water that was discharged.
 - d) The steps being taken to reduce, eliminate and prevent occurrence of any discharge.

2. Approved Land Application Areas

You are authorized to land apply wastewater only to the following site owned by the permittee:

40 acres in the NW ¼ of Section 30, T76N, R11W in Keokuk County, Iowa

The approved land application area is shown on page 6 of this permit.

3. Operational Conditions

- a) Wastewater must be treated in the lagoons prior to being land applied. This permit prohibits bypassing the treatment lagoons and directly applying wastewater onto any of the approved land application areas.
- b) No wastewater generated off-site may be accepted for disposal.
- c) A minimum of 2 feet of freeboard shall be maintained in the lagoons at all times.
- d) Wastewater shall not be applied within 300 feet of dwellings or public use areas (not including public roads).
- e) Wastewater shall not be applied within 50 feet of the property lines of an application field.
- f) Wastewater shall not be applied within 400 feet of potable water supply wells not located on the application field.
- g) Wastewater shall not be surface applied within 200 feet of potable water supply wells

Facility Name: Responsible Transportation
Iowa Operation Permit Number: 5475100
located on the application field.

- h) Wastewater shall not be applied within 300 feet of a continuous flowing stream or any physiographic feature that may provide direct connection to the groundwater.
- i) Wastewater shall not be applied within 1000 feet of a shallow public well.
- j) Wastewater shall not be applied within 500 feet of a public lake or impoundment.
- k) Wastewater shall not be applied within one-half mile of a public lake or impoundment used as a source of water by a potable water supply.
- l) If wastewater is spray irrigated, the spraying shall be limited to daylight hours when winds are 15 mph or less.
- m) No ponding of the applied wastewater shall be allowed to occur.
- n) Wastewater shall not be applied to flooded areas until the ground has sufficient time to dry.
- o) Wastewater shall not be land applied during periods of ground frost.
- p) Land application of wastewater is not allowed while it is raining.
- q) Land application of wastewater shall be stopped if runoff occurs.
- r) The wastewater application rate shall not exceed one inch/hour.
- s) If rainfall occurs, the amount of rainfall shall be subtracted from the allowable wastewater application rate listed in item "r" above.
- t) The total annual application of nitrogen from all sources (including any application of commercial fertilizer or animal wastes) shall not exceed 200 lbs/acre/year.
- u) The grass or crops on the land application area shall be harvested and removed, if necessary, so the nutrient requirement is not exceeded.
- v) The disposal area shall be posted along public roads and public use areas. A minimum of one sign shall be placed on each side of each disposal area. The perimeter distance between any two signs shall not exceed 500 feet. Each sign shall clearly identify the nature of the facility and advise against trespassing in letters not less than 2 inches high. Signs shall be posted a minimum of seven consecutive days prior to using a site for land application and shall remain in place for a minimum of fourteen consecutive days following each application.

4. Monitoring and Reporting Requirements

You must monitor as specified on page 5 of this permit and report the results to the department

Facility Name: Responsible Transportation
Iowa Operation Permit Number: 5475100
or the samples were collected.

- a) Samples and measurements taken shall be representative of the volume and nature of the monitored wastewater.
- b) Analytical and sampling methods specified in 40 CFR Part 136 or other methods approved in writing by the department shall be utilized. Samples collected for operational testing need not be analyzed by approved analytical methods; however, commonly accepted test methods should be used.
- c) You are required to report all data including calculated results needed to determine compliance with the limitations contained in this permit. The results of any monitoring not specified in this permit performed at the compliance monitoring point and analyzed according to 40 CFR Part 136 shall be included in the calculation and reporting of any data submitted in accordance with this permit. This includes daily maximums and minimums and 30-day and 7-day averages for all parameters that have concentration (mg/l) and mass (lbs/day) limits. In addition, flow data shall be reported in million gallons per day (MGD).
- d) Results of all monitoring shall be recorded on forms provided by, or approved by, the department, and shall be submitted to the appropriate regional field office of the department by the fifteenth day following the close of the reporting period. Your reporting period is on a MONTHLY basis, ending on the last day of each reporting period.
- e) Any records of monitoring activities and results shall include for all samples: the date, exact place and time of the sampling; the dates the analyses were performed; who performed the analyses; the analytical techniques or methods used; and the results of such analyses.
- f) Chapter 63 of the Iowa Administrative Code contains further explanation of these monitoring requirements.

Definition of Terms

The term *Nitrogen, Total (as N)* means the sum of the measured values of Total Kjeldahl Nitrogen plus Nitrate Nitrogen plus Nitrite Nitrogen.

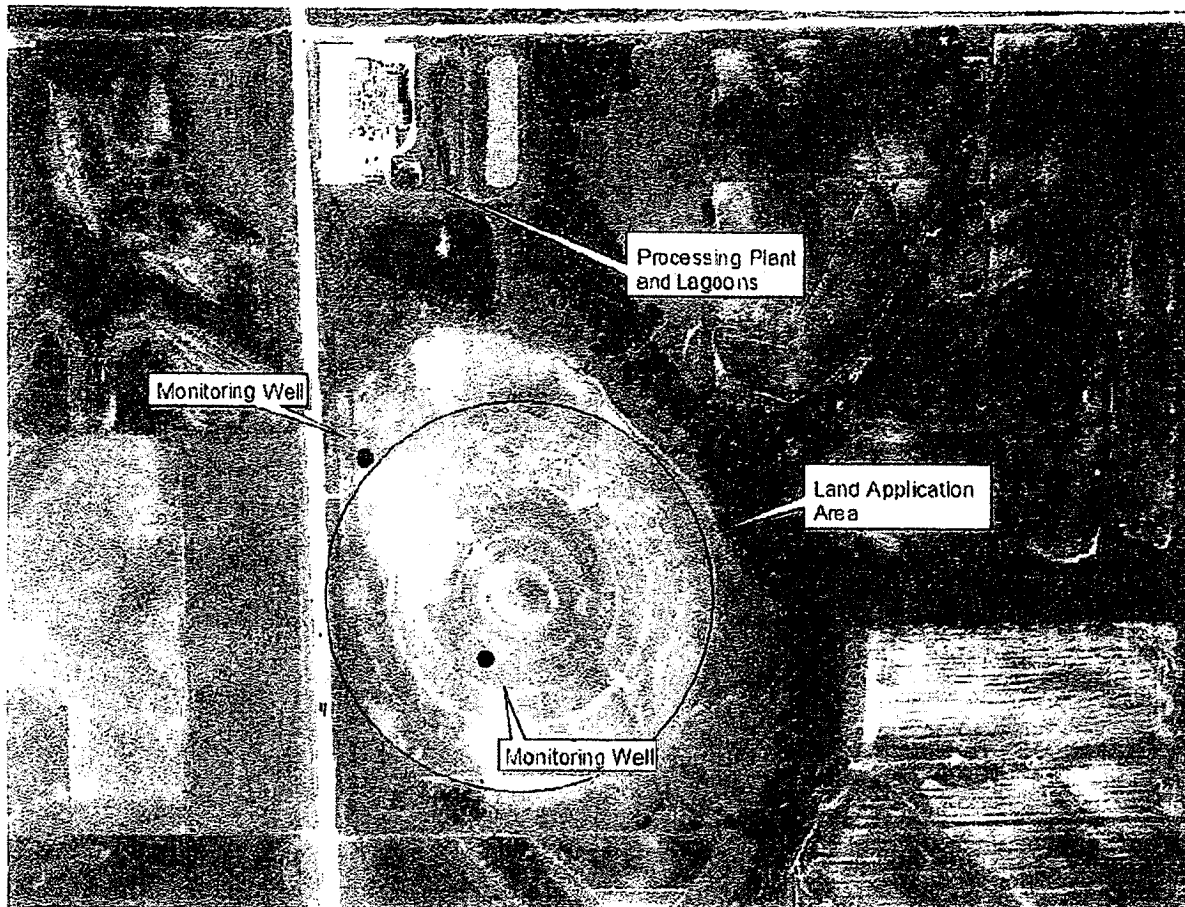
The term *Flow (Volume Land Applied)* means the total volume of wastewater applied to any individual land application area during a calendar year.

Facility Name: Responsible Transportation
Iowa Operation Permit Number: 54751100

Outfall	Wastewater Parameter	Sample Frequency	Sample Type	Monitoring Location
The following monitoring requirements shall be in effect from March 1, 2013 to February 28, 2018				
001	NITROGEN, TOTAL (AS N)	7/WEEK OR DAILY	CALCULATED	YEAR TO DATE TOTAL POUNDS PER ACRE APPLIED
001	FLOW	7/WEEK OR DAILY	24 HOUR TOTAL	RAW WASTEWATER TO THE STORAGE LAGOONS
001	FLOW (VOLUME LAND APPLIED)	7/WEEK OR DAILY	24 HOUR TOTAL	PRIOR TO LAND APPLICATION
001	NITROGEN, TOTAL (AS N)	1 EVERY 3 MONTHS	24 HOUR COMPOSITE	WASTEWATER FROM STORAGE FINAL LAGOON CELL, PRIOR TO LAND APPLICATION
001	PHOSPHORUS, TOTAL (AS P)	1 EVERY 3 MONTHS	24 HOUR COMPOSITE	WASTEWATER FROM STORAGE FINAL LAGOON CELL, PRIOR TO LAND APPLICATION
001	COLIFORM, FECAL	1 EVERY 3 MONTHS	GRAB	DOWNGRAIENT MONITORING WELL
001	NITRATE NITROGEN (AS N)	1 EVERY 3 MONTHS	GRAB	DOWNGRAIENT MONITORING WELL
001	SOLIDS, TOTAL DISSOLVED	1 EVERY 3 MONTHS	GRAB	DOWNGRAIENT MONITORING WELL
001	COLIFORM, FECAL	1 EVERY 3 MONTHS	GRAB	UPGRAIENT MONITORING WELL
001	NITRATE NITROGEN (AS N)	1 EVERY 3 MONTHS	GRAB	UPGRAIENT MONITORING WELL
001	SOLIDS, TOTAL DISSOLVED	1 EVERY 3 MONTHS	GRAB	UPGRAIENT MONITORING WELL
001	CELL DEPTH	2 TIMES PER WEEK	MEASUREMENT	AEROBIC LAGOON 2
001	CELL DEPTH	2 TIMES PER WEEK	MEASUREMENT	AEROBIC LAGOON 1

Facility Name: Responsible Transportation
Iowa Operation Permit Number: 54751100

APPROVED LAND APPLICATION AREA



STANDARD CONDITIONS

1. ADMINISTRATIVE RULES

Rules of this Department that govern the operation of your facility in connection with this permit are published in Part 567 of the Iowa Administrative Code (IAC) in Chapters 60-65, 67 and 121. Reference to the term "rule" in this permit means the designated provision of Part 567 of the IAC.

2. DEFINITIONS

- (a) 7 day average means the sum of the total daily discharges by mass, volume or concentration during a 7 consecutive day period, divided by the total number of days during the period that measurements were made. Four 7 consecutive day periods shall be used each month to calculate the 7-day average. The first 7-day period shall begin with the first day of the month.
- (b) 30 day average means the sum of the total daily discharges by mass, volume or concentration during a calendar month, divided by the total number of days during the month that measurements were made.
- (c) daily maximum means the total discharge by mass, volume or concentration during a twenty-four hour period.

3. DUTY TO COMPLY

You must comply with all conditions of this permit. Any permit noncompliance is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Issuance of this permit does not relieve you of the responsibility to comply with all local, state and federal laws, ordinances, regulations or other legal requirements applying to the operation of your facility. *{See 567 IAC 64.7(4)"e"}*

4. DUTY TO REAPPLY

If you wish to continue to discharge after the expiration date of this permit, you must file a complete application for reissuance at least 180 days prior to the expiration date of this permit. *{See 567 IAC 64.8(1)}*

5. NEED TO HALT OR REDUCE ACTIVITY

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. *{See 567 IAC 64.7(5)"j"}*

6. DUTY TO MITIGATE

You shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment. *{See 567 IAC 64.7(5)"i"}*

7. PROPERTY RIGHTS

This permit does not convey any property rights of any sort or any exclusive privilege. *{See 567 IAC 64.4(3)"b"}*

8. SIGNATORY REQUIREMENTS

Applications, reports or other information submitted to the Department in connection with this permit must be signed and certified as required by 567 IAC 64.3(8).

9. EFFECT OF A PERMIT

Compliance with a permit during its term constitutes compliance, for purposes of enforcement, with the limitations and standards set out in 567 IAC Chapters 61 and 62. *{See 567 IAC 64.4(3)"a"}*

10. TRANSFER OF TITLE OR OWNER ADDRESS CHANGE

If title to your facility, or any part of it, is transferred the new owner shall be subject to this permit. You are required to notify the new owner of the requirements of this permit in writing prior to any transfer of title. The Director shall be notified in writing within 30 days of the transfer. No transfer of the authorization to discharge from the facility represented by the permit shall take place prior to notifying the department of the transfer of title. Whenever the address of the owner is changed, the department shall be notified in writing within 30 days of the address change. Electronic notification is not sufficient; all title transfers or address changes must be reported to the department by mail. *{See 567 IAC 64.14}*

11. PROPER OPERATION AND MAINTENANCE

All facilities and control systems shall be operated as efficiently as possible and maintained in good working order. A sufficient number of staff, adequately trained and knowledgeable in the operation of your facility shall be retained at all times and adequate laboratory controls and appropriate quality assurance procedures shall be provided to maintain compliance with the conditions of this permit. *{See 567 IAC 64.7(5)"f"}*

12. DUTY TO PROVIDE INFORMATION

You must furnish to the Director, within a reasonable time, any information the Director may request to determine compliance with this permit or determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, in accordance with 567 IAC 64.3(1)(c). You must also furnish to the Director, upon request, copies of any records required to be kept by this permit.

13. PERMIT MODIFICATION, SUSPENSION OR REVOCATION

- (a) This permit may be modified, suspended, or revoked and reissued for cause including but not limited to those specified in 567 IAC 64.3(11).
- (b) This permit may be modified due to conditions or information on which this permit is based, including any new standard the department may adopt that would change the required effluent limits. *{See 567 IAC 64.3(11)}*
- (c) If a toxic pollutant is present in your discharge and more stringent standards for toxic pollutants are established under Section 307(a) of the Clean Water Act, this permit will be modified in accordance with the new standards. *{See 567 IAC 64.7(5)"g"}*

The filing of a request for a permit modification, revocation or suspension, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

14. SEVERABILITY

The provisions of this permit are severable and if any provision or application of any provision to any circumstance is found to be invalid by this department or a court of law, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected by such finding.

15. FAILURE TO SUBMIT FEES

This permit may be revoked, in whole or in part, if the appropriate permit fees are not submitted within thirty (30) days of the date of notification that such fees are due. *{See 567 IAC 64.16(1)}*

STANDARD CONDITIONS

16. REPORTING A DISCHARGE (TWENTY-FOUR HOUR REPORTING)

You shall report any noncompliance that may endanger human health or the environment, including, but not limited to, violations of maximum daily limits for any toxic pollutant or hazardous substance. Information shall be provided orally within 24 hours from the time you become aware of the circumstances. A written submission including a description of noncompliance and its cause; the period of noncompliance including exact dates and times, whether the noncompliance has been corrected or the anticipated time it is expected to continue; and the steps taken or planned to reduce, eliminate, and prevent a recurrence of the noncompliance must be provided within 5 days of the occurrence.

(See 567 IAC 63.12)

17. OTHER NONCOMPLIANCE

You shall report all instances of noncompliance not reported under Condition #13 at the time monitoring reports are submitted. You shall give advance notice to the appropriate regional field office of the department of any planned activity which may result in noncompliance with permit requirements.

(See 567 IAC 63.14)

18. PLANNED CHANGES

The permittee shall give notice to the appropriate regional field office of the department 30 days prior to any planned physical alterations or additions to the permitted facility. Notice is required only when:

- (a) Notice has not been given to any other section of the department. (Note: Facility expansions, production increases or process modifications which may result in new or increased discharges of pollutants must be reported to the Director in advance. If such discharges will exceed effluent limitations, your report must include an application for a new permit. If any modification of, addition to, or construction of a disposal system is to be made, you must first obtain a written permit from this Department.) *(See 567 IAC 64.7(5) "a" and 64.2)*
- (b) The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source as defined in 567—60.2(455B);
- (c) The alteration or addition results in a significant change in the permittee's sludge use or disposal practices; or
- (d) The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants that are not subject to effluent limitations in the permit.

(See 567 IAC 63.13 and 63.14)

19. NOTICE OF CHANGED CONDITIONS

You are required to notify the director of any changes in existing conditions or information on which this permit is based. This includes, but is not limited to, the following:

- a) If your facility is a publicly owned treatment works (POTW) or otherwise may accept waste for treatment from an indirect discharger or industrial contributor (see 567 IAC 64.3(5) for further notice requirements).
- (b) If your facility is a POTW and there is any substantial change in the volume or character of pollutants being introduced by a source introducing pollutants into the POTW at the time of issuance of the permit.

- (c) As soon as you know or have reason to believe that any activity has occurred or will occur which would result in the discharge of any toxic pollutant which is not limited in this permit.
- (d) If you have begun or will begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the permit application.
- (e) No construction activity that will result in disturbance of one acre or more shall be initiated without first obtaining coverage under NPDES General Permit No. 2 for "Storm water discharge associated with construction activity".

20. MONITORING AND RECORDS OF OPERATION

- (a) Maintenance of records. You shall retain for a minimum of three years all paper and electronic records of monitoring activities and results including all original strip chart recordings for continuous monitoring instrumentation and calibration and maintenance records. *(See 567 IAC 63.2(3))*
- (b) Any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment for not more than two years, or both.

21. USE OF CERTIFIED LABORATORIES

Effective October 1, 1996, analyses of wastewater, groundwater or sewage sludge that are required to be submitted to the department as a result of this permit must be performed by a laboratory certified by the State of Iowa. Routine, on-site monitoring for pH, temperature, dissolved oxygen, total residual chlorine and other pollutants that must be analyzed immediately upon sample collection, settleable solids, physical measurements, and operational monitoring tests specified in 567 IAC 63.3(4) are excluded from this requirement.

22. INSPECTION OF PREMISES, RECORDS, EQUIPMENT, METHODS AND DISCHARGES

You are required to permit authorized personnel to:

- (a) Enter upon the premises where a regulated facility or activity is located or conducted or where records are kept under conditions of this permit.
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- (c) Inspect, at reasonable times, any facilities, equipment, practices or operations regulated or required under this permit.
- (d) Sample or monitor, at reasonable times, to assure compliance.

23. OTHER INFORMATION

Where you become aware that you failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, you must promptly submit such facts or information. Where you become aware that you failed to submit any relevant facts in the submission of in any report to the director, including records of operation, you shall promptly submit such facts or information.

(See 567 IAC 60.4(2) "a" and 567 IAC 63.7)



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

February 14, 2013

CERTIFIED MAIL

██████████ President/CEO
Responsible Transportation, LLC
22034 200th Street
Sigourney, IA 52591

RE: NPDES Final Permit # 54-75-1-00

Dear ██████████

Enclosed is the final NPDES permit that authorizes the land application of wastewater from Responsible Transportation, LLC. This permit contains operational conditions and monitoring and reporting requirements. The issuance date of this permit is March 1, 2013; please become familiar with all requirements in the enclosed final permit.

The facility is required to use new monthly operation report forms once a final permit is issued. Paper and electronic monthly operating report forms are available from your regional DNR field office. The facility is encouraged to use the electronic reporting form. Please contact ██████████ at Field Office 6, ██████████ for more information.

If you have any questions, please contact me at ██████████ or ██████████.

Sincerely,

██████████

Karen Lodden
Environmental Specialist
NPDES Permits Section

Enclosures

c: Field Office 6

502 EAST 9th STREET / DES MOINES, IOWA 50319-0034
PHONE 515-281-5918 FAX 515-281-8895 www.iowadnr.gov

AR0003375



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

February 25, 2013

CERTIFIED MAIL

[REDACTED] President/CEO
Responsible Transportation, LLC
22034 200th Street
Sigourney, IA 52591

RE: State Operation Permit Amendment for Facility #5475100

Dear [REDACTED]

Enclosed is a copy of the State Operation Permit amendment for permit no. 5475100 for Responsible Transportation. The permit is amended to correct the numbering of the Monitoring and Reporting Requirements paragraph. Please remove page #3 from the State Operation Permit and replace it with the enclosed page #3.

If you have any questions regarding this amendment, please contact me at [REDACTED] or [REDACTED]

Sincerely,

[REDACTED]

[REDACTED]
Environmental Specialist
NPDES Permits Section

c: Field Office 6

Enclosures

502 EAST 9th STREET / DES MOINES, IOWA 50319-0034
PHONE 515-281-5918 FAX 515-281-8895 www.iowadnr.gov

AR0003376

Memorandum

DATE: February 14, 2013
TO: Wastewater File # 6-54-75-1-00
Responsible Transportation, LLC
FROM: [REDACTED]
RE: NPDES Permit Rationale

Responsible Transportation is a processor of equine meat. The facility is located at 22034 200th Street near Sigourney, Keokuk County Iowa in Township 76N, Range 11W, Section 30. The land application area is owned by the facility. The facility location and the location of the approved land application area are shown on page 6 of the permit.

Wastewater from the processing facility piped to the anaerobic lagoon, which is the first cell of a three cell lagoon system. The anaerobic lagoon has a storage capacity of 744,000 gallons. Wastewater is piped from the anaerobic lagoon to the aerobic lagoons. The storage capacity of the aerobic lagoons are 3.4 and 4.4 million gallons. Following treatment, the wastewater is piped to the center pivot irrigation system. The land application area available for disposal of the wastewater consists of 40 acres located in the NW ¼ of S30, T76N, R11W.

Operation Requirements

The permit specifies a number of requirements applicable to the operation of the storage lagoon and land application sites. Most of these requirements were contained in the previous wastewater operation permit issued November 2, 2005. The new or revised requirements will ensure that wastewater is properly disposed in a manner that will not adversely impact surface or groundwater.

The permit prohibits any discharge of sewage, industrial waste or other waste from the storage lagoons or land application operations. Requirement #1 specifies the reporting requirements should a discharge into surface waters occur. Requirement #2 prohibits the disposal of any sanitary sewage either into the storage lagoons or directly via land application.

New requirement #3 contains the legal description for the site approved for land application of wastewater. The approved site is further identified on the aerial photo on page 6 of the permit. The facility is the owner of the land application site.

Requirement #4 of the permit contains the operational conditions. These conditions are specified in IAC 567-64.2(3), Iowa's Wastewater Facilities Design Standards for Land Application of Wastewater, Chapter 21, or are based on best professional judgment for the type and operation of the wastewater treatment system.

Monitoring Requirements

The monitoring requirements are in accordance with IAC 567-63.3(3)(1), Table IV, which requires

sampling and analysis of the applied wastewater for total nitrogen and total phosphorus and measurement of the volume of wastewater applied, and IAC 567-63.3(3)(1), Table IV requires sampling and analysis of groundwater from monitoring wells for nitrate nitrogen, dissolved solids, and fecal coliform. IAC 567-63.3(4), Table II requires measurement of cell depth.

Reporting Requirements

Monthly reporting is required in accordance with IAC 567-63.8(455B).

Memorandum

DATE: February 14, 2013, revised February 25, 2013
TO: Wastewater File # 6-54-75-1-00
Responsible Transportation, LLC
FROM: [REDACTED]
RE: NPDES Permit Rationale

Responsible Transportation is a processor of equine meat. The facility is located at 22034 200th Street near Sigourney, Keokuk County Iowa in Township 76N, Range 11W, Section 30. The land application area is owned by the facility. The facility location and the location of the approved land application area are shown on page 6 of the permit.

Wastewater from the processing facility piped to the anaerobic lagoon, which is the first cell of a three cell lagoon system. The anaerobic lagoon has a storage capacity of 744,000 gallons. Wastewater is piped from the anaerobic lagoon to the aerobic lagoons. The storage capacity of the aerobic lagoons are 3.4 and 4.4 million gallons. Following treatment, the wastewater is piped to the center pivot irrigation system. The land application area available for disposal of the wastewater consists of 40 acres located in the NW ¼ of S30, T76N, R11W.

Operation Requirements

The permit specifies a number of requirements applicable to the operation of the storage lagoon and land application sites. Most of these requirements were contained in the previous wastewater operation permit issued November 2, 2005. The new or revised requirements will ensure that wastewater is properly disposed in a manner that will not adversely impact surface or groundwater.

The permit prohibits any discharge to surface water of sewage, industrial waste or other waste from the storage lagoons or land application operations. Requirement #1 specifies the reporting requirements should a discharge into surface waters occur. New requirement #2 contains the legal description for the site approved for land application of wastewater. The approved site is further identified on the aerial photo on page 6 of the permit. The facility is the owner of the land application site.

Requirement #3 of the permit contains the operational conditions. These conditions are specified in IAC 567-64.2(3), Iowa's Wastewater Facilities Design Standards for Land Application of Wastewater, Chapter 21, or are based on best professional judgment for the type and operation of the wastewater treatment system.

Monitoring Requirements

The monitoring requirements are in accordance with IAC567-63.3(3)(1), Table IV, which requires sampling and analysis of the applied wastewater for total nitrogen and total phosphorus and

measurement of the volume of wastewater applied, and IAC 567-63.3(3)(1), Table IV requires sampling and analysis of groundwater from monitoring wells for nitrate nitrogen, dissolved solids, and fecal coliform. IAC 567-63.3(4), Table II requires measurement of cell depth.

Reporting Requirements

Monthly reporting is required in accordance with IAC 567-63.8(455B).



TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

STATE OF IOWA

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

STATE OF IOWA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROGRAM
AMENDMENT TO STATE OPERATION PERMIT

Iowa State Operation Permit #	5475100
Date of Issuance:	March 1, 2013
Date of Expiration:	February 28, 2018
Date of this Amendment:	<u>March 1, 2013</u>
EPA NUMBER:	IA0073474

Name and Mailing Address of Applicant:

Responsible Transportation
22045 200th Street
Sigourney, IA 52591

Identity and Location of Facility:

Responsible Transportation
Township 76N, Range 11W, Section 30, Keokuk County

Pursuant to the authority Iowa Code Section 455B.174, and of Rule 567-64.3, Iowa Administrative Code, the Director of the Iowa Department of Natural Resources has issued the above referenced permit:
Pursuant to the same authority, the Director hereby amends said permit as set forth below:

The State Operation Permit is amended to correct the numbering of the Monitoring and Reporting Requirements paragraph. Please remove page #3 from the permit and replace it with the enclosed page #3.

For the Department of Natural Resources:

By _____

Environmental Specialist
NPDES Section

ENVIRONMENTAL SERVICES DIVISION

502 EAST 9th STREET / DES MOINES, IOWA 50319-0034
PHONE 515-281-5918 FAX 515-281-8895 www.iowadnr.gov

AR0003381

Facility Name: Responsible Transportation
Iowa Operation Permit Number: 5475100
located on the application field.

- h) Wastewater shall not be applied within 300 feet of a continuous flowing stream or any physiographic feature that may provide direct connection to the groundwater.
- i) Wastewater shall not be applied within 1000 feet of a shallow public well.
- j) Wastewater shall not be applied within 500 feet of a public lake or impoundment.
- k) Wastewater shall not be applied within one-half mile of a public lake or impoundment used as a source of water by a potable water supply.
- l) If wastewater is spray irrigated, the spraying shall be limited to daylight hours when winds are 15 mph or less.
- m) No ponding of the applied wastewater shall be allowed to occur.
- n) Wastewater shall not be applied to flooded areas until the ground has sufficient time to dry.
- o) Wastewater shall not be land applied during periods of ground frost.
- p) Land application of wastewater is not allowed while it is raining.
- q) Land application of wastewater shall be stopped if runoff occurs.
- r) The wastewater application rate shall not exceed one inch/hour.
- s) If rainfall occurs, the amount of rainfall shall be subtracted from the allowable wastewater application rate listed in item "r" above.
- t) The total annual application of nitrogen from all sources (including any application of commercial fertilizer or animal wastes) shall not exceed 200 lbs/acre/year.
- u) The grass or crops on the land application area shall be harvested and removed, if necessary, so the nutrient requirement is not exceeded.
- v) The disposal area shall be posted along public roads and public use areas. A minimum of one sign shall be placed on each side of each disposal area. The perimeter distance between any two signs shall not exceed 500 feet. Each sign shall clearly identify the nature of the facility and advise against trespassing in letters not less than 2 inches high. Signs shall be posted a minimum of seven consecutive days prior to using a site for land application and shall remain in place for a minimum of fourteen consecutive days following each application.

4. Monitoring and Reporting Requirements

You must monitor as specified on page 5 of this permit and report the results to the department



Print Form

FORM 6 - OPERATION PERMITS

IOWA DEPARTMENT OF NATURAL RESOURCES NPDES PERMIT APPLICATION
FORM 6 - OPERATION PERMITS

FACILITY INFORMATION	NAME Responsible Transportation		STREET ADDRESS 22034 200th St	
	TELEPHONE [REDACTED]	CITY Sigourney	STATE IA	ZIP CODE 52591
OWNER INFORMATION	NAME Responsible Transportation, LLC		STREET ADDRESS 22034 200th St	
	TELEPHONE [REDACTED]	CITY Sigourney	STATE IA	ZIP CODE 52591
CONTACT PERSON	NAME [REDACTED]	TITLE President/CEO	MAILING ADDRESS 22034 200th St	
	TELEPHONE [REDACTED]	CITY Sigourney	STATE IA	ZIP CODE 52591
FACILITY LOCATION	COUNTY: Keokuk			
	30 SECTION	76N TOWNSHIP	11W RANGE	
NATURE OF FACILITY	<p><i>Describe briefly the nature of the facility where the waste is generated (e.g. meat processing, livestock trucking, sewage treatment plant) and the process(es) that generate wastewater (domestic sewage, process tank cleanout, etc.).</i></p> <p>The Facility Will Process Equine Meat. Major Contributions To The Total Wastewater Load Include The Production Of Blood (Blood Is Produced During The Killing, Bleeding and Skinning Phases) And Paunch Manure. Minor Contributions To The Total Wastewater Load Include Waste Results From Urine And Manure, Feed, Livestock Dirt, Sanitizers And Cleaning Agents In The Pens; Blood And Tissue Produced During The Hide Removal As Well As External Contamination Of The Hide With Dirt And Manure; Intentional Overflow From Scalding Tanks Which Contain Blood, Dirt, Manure And Hair; Slime And Casing From Intestines; And Inedible Offals.</p>			
TREATMENT SYSTEM	<p><i>Briefly describe the treatment system and/or storage system including type of treatment or storage (e.g. lagoon, tank, etc.), location of the treatment or storage, and the volume of the treatment or storage system.</i></p> <p>Storage System Includes Three Lagoons. The First Lagoon Is An [REDACTED] Lagoon With A Storage Capacity Of [REDACTED] Gallons. The Second Lagoon Is An [REDACTED] Lagoon With A Storage Capacity Of [REDACTED] Gallons. The Third Lagoon Is An [REDACTED] Lagoon With A Storage Capacity Of [REDACTED] Gallons. The Total Area Of Lagoons Is [REDACTED] Square Feet. The Lagoons Are Located To The Southeast And East Of The Facility On The Property Of The Facility. Please See The Attached Site Plan</p>			
OTHER PERMITS	<p><i>List all environmental permits from federal, state or local agencies required for this disposal system. If a permit has been applied for but has not yet been issued write "applied for" under issue date.</i></p>			
	TYPE OF PERMIT	PERMIT NO.	ISSUE DATE	ISSUING AGENCY



FORM 6 - OPERATION PERMITS

WASTEWATER TRANSPORT	How is wastewater transported from the source at which it is generated to the final disposal site (pipe, truck, etc.)?				
	Wastewater moves by pipe from the facility to the anaerobic lagoon and from there is moves from pipe to the aerobic lagoons. Finally, the wastewater is transported via pipe to the irrigation system.				
WASTEWATER TRANSPORT BY OTHER ENTITY	If wastewater is transported by someone other than the system that generates the wastewater, provide the following information for each person:				
	PERSON 1:	NAME		STREET ADDRESS	
		TELEPHONE	CITY	STATE	ZIP CODE
	PERSON 2:	NAME		STREET ADDRESS	
		TELEPHONE	CITY	STATE	ZIP CODE
	DISPOSAL METHODS	Describe the method(s) used for disposal (land application, underground injection, total retention lagoon, etc.).			
Land Application					
WASTEWATER VOLUME	Specify the volume of wastewater to be disposed of per year. If wastewater will be land applied, specify the volume per acre to be applied per year.				
	Volume of wastewater disposed of per year:		[REDACTED] ft ³ /Year		
	Volume of wastewater land applied per acre per year (if land applied):		[REDACTED] ft ³ /Acre/Yea		
DESCRIPTION OF LAND APPLICATION	If wastewater will be land applied how will it be applied (center pivot, traveling gun, mobile equipment, etc.)? Will wastewater be surface applied or injected?				
	Wastewater Will Be Applied With A Center Pivot Irrigation System. Wastewater Will Be Surface Applied.				
LAND APPLICATION BY OTHER ENTITY	If wastewater is land applied by someone other than the system that generates the wastewater, provide the information for each person who land applies the wastewater:				
	PERSON 1:	NAME		STREET ADDRESS	
		TELEPHONE	CITY	STATE	ZIP CODE
	PERSON 2:	NAME		STREET ADDRESS	
		TELEPHONE	CITY	STATE	ZIP CODE



FORM 6 - OPERATION PERMITS

DISPOSAL SITE INFORMATION	Provide the following information for each disposal site. Attach additional sheets if necessary. Please note, if wastewater will be applied on any land owned by a party other than the person applying for this permit you must provide a signed copy of a document (Land Owner Agreement) with each land owner that establishes your legal right to use the land for a period of not less than five (5) years. Land Owner Agreements shall include provisions for renewal options that specify that at least one year's notice be provided, in writing, to the applicant if the land owner does not intend to renew the agreement.					
	SITE NUMBER (1, 2, 3...)					
	COUNTY: Keokuk					
	LEGAL DESCRIPTION: The west forty acres of the northwest fractional quarter of the northwest quarter					
	QUARTER SECTION Northwest	QUARTER SECTION Northwest Fractional	SECTION 30	TOWNSHIP 76N	RANGE 11W	
NUMBER OF ACRES (for land application sites): 40						
NAME OF PROPERTY OWNER: Responsible Transportation LLC						
LAND OWNER AGREEMENT ATTACHED (if necessary): YES <input type="checkbox"/> NO <input type="checkbox"/>						
LOCATION MAP	SITE NUMBER (1, 2, 3...)					
	COUNTY:					
	LEGAL DESCRIPTION:					
	QUARTER SECTION	QUARTER SECTION	SECTION	TOWNSHIP	RANGE	
	NUMBER OF ACRES (for land application sites):					
	NAME OF PROPERTY OWNER:					
	LAND OWNER AGREEMENT ATTACHED (if necessary): YES <input type="checkbox"/> NO <input type="checkbox"/>					
	SITE NUMBER (1, 2, 3...)					
	COUNTY:					
	LEGAL DESCRIPTION:					
	QUARTER SECTION	QUARTER SECTION	SECTION	TOWNSHIP	RANGE	
	NUMBER OF ACRES (for land application sites):					
NAME OF PROPERTY OWNER:						
LAND OWNER AGREEMENT ATTACHED (if necessary): YES <input type="checkbox"/> NO <input type="checkbox"/>						
SITE NUMBER (1, 2, 3...)						
COUNTY:						
LEGAL DESCRIPTION:						
QUARTER SECTION	QUARTER SECTION	SECTION	TOWNSHIP	RANGE		
NUMBER OF ACRES (for land application sites):						
NAME OF PROPERTY OWNER:						
LAND OWNER AGREEMENT ATTACHED (if necessary): YES <input type="checkbox"/> NO <input type="checkbox"/>						
Provide a map or photo showing the location of the facility generating wastewater, each treatment or storage system, each disposal site, and the location(s) of each existing groundwater monitoring well.						



FORM 6 - OPERATION PERMITS

EFFLUENT
SAMPLING:
WASTEWATER
TO TREATMENT
OR STORAGE

For the wastewater directed to your treatment or storage unit, you must do the following:
Existing Sources - You must provide measurements for the pollutants listed in the left-hand column below.
New Discharges - You must provide estimates for the pollutants listed in the left-hand column below.
In the blank spaces in the left hand column, you are required to list each pollutant that you know or have reason to believe is present. See the instructions for additional details and requirements.

Pollutant	Maximum Daily Value - Concentration (include units)	Average Daily Value (last year) - Concentration (include units)	Number of Measurements Taken (past 12 months)	Source of Estimate (if new discharger)	Certified Laboratory Number
				Food & Livestock	
				Food & Livestock	
				Food & Livestock	

EFFLUENT
SAMPLING:
WASTEWATER
PRIOR TO LAND
APPLICATION

For wastewater directed to land application (this section is only required if you land apply wastewater):
Existing Sources - You must provide measurements for the pollutants listed in the left-hand column below.
New Discharges - You must provide estimates for the pollutants listed in the left-hand column below.
In the blank spaces in the left hand column, you are required to list each pollutant that you know or have reason to believe is present. See the instructions for additional details and requirements.

Pollutant	Maximum Daily Value - Concentration (include units)	Average Daily Value (last year) - Concentration (include units)	Number of Measurements Taken (past 12 months)	Source of Estimate (if new discharger)	Certified Laboratory Number
				Food & Livestock	
				Food & Livestock	
				Food & Livestock	



FORM 6 INSTRUCTIONS DO NOT SUBMIT THESE PAGES – FOR APPLICANT USE ONLY

FORM 6 – OPERATION PERMITS INSTRUCTIONS

Page 1

Facility Information - Enter the name and full address of the facility that generates the wastewater for which the permit is being requested.

Owner Information - Enter the name and address of the owner of the facility.

Contact Person - Give the name, title, address and telephone number of the person who is thoroughly familiar with the operation of the facility and with the information reported in this application.

Facility Location - List the location of the facility by county, section, township, and range.

Nature of Facility – self-explanatory.

Treatment System – self-explanatory.

Other Permits - List each environmental permit required to operate this facility, the permit number, issue date and issuing agency (e.g. UIC, water use, wastewater construction). If a permit has been applied for but has not yet been issued enter "Applied For" and the date the application was submitted.

Page 2

Wastewater Transport – Describe how the wastewater is transported to the final disposal site.

Wastewater Transport by Other Entity – If wastewater is transported by someone other than the facility that generates the wastewater, provide the name, address, and phone number for the person, or persons, who transport the wastewater. Attach additional sheets if necessary.

Disposal Methods – Describe the method(s) used for disposal of the wastewater.

Wastewater Volume – Specify the volume of wastewater that will be disposed of per year and the volume of wastewater to be land applied per acre per year, if the wastewater will be land applied.

Description of Land Application – Describe the land application method(s) that will be used to apply the wastewater, if the wastewater will be land applied.

Land Application by Other Entity – If the wastewater is land applied by someone other than the facility that generates the wastewater provide the name, address and phone number for the person, or persons, who land applies the wastewater.

Page 3

Disposal Site Information – For each disposal site, provide the legal description, the county, the number of acres that will be used for land application (if the wastewater is land applied), and the name of the property owner. Complete all of the information for every disposal site, and attach additional sheets if necessary.

If wastewater will be applied on any land owned by a party other than the person applying for this permit you must provide a signed copy of a document (Land Owner Agreement) with each land owner that establishes your legal right to use the land for a period of not less than five (5) years. Land Owner Agreements shall include provisions for renewal options that specify that at least one year's notice be provided, in writing, to the applicant if the land owner does not intend to renew the agreement. Attach any Land Owner Agreements to the permit application, and check the "yes" box to indicate that the agreement has been attached. If the person applying for the permit is the land owner for the site, no Land Owner Agreement is needed.



Location Map - Provide a map no larger than 8½" x 11" of the area which clearly shows the location of the facility, the location of each treatment or storage system, the location and number of each disposal site, and the location(s) of each existing groundwater monitoring well. An aerial photo or copy of the appropriate section of a 7½ minute series topographic map published by the U.S. Geological Survey is preferable.

Page 4

Effluent Sampling: Wastewater to Treatment or Storage -

Existing Dischargers: You are required to report the concentration in mg/l (milligrams per liter) for each of the listed pollutants for the wastewater sent to the storage facility (5-Day Biochemical Oxygen Demand, Total Nitrogen, and Total Phosphorus).

You are required to provide at least one analysis for each pollutant listed. Data reported must be representative of your current operation. The analysis of these pollutants must be done in accordance with EPA approved procedures listed in 40 CFR Part 136. For the listed pollutants, 24-hour composite samples must be used. Samples must be analyzed by a laboratory certified in the State of Iowa to perform the required analysis except for any pollutant that must be analyzed immediately upon collection of the sample.

In the blank spaces, you must provide sampling results for any pollutant that you know or have reason to believe is present. Base your determination of whether a pollutant will be present in your discharge on your knowledge of the proposed facility's raw materials, maintenance chemicals, intermediate and final products, byproducts, and any analyses of your effluent or of any similar effluent. You may also provide the determination based on available in-house reports, contractor's engineering reports, or any other studies performed on the proposed facility. If you expect a pollutant to be present solely as a result of its presence in your intake water, please state this information on the form.

New Dischargers: You are required to provide an estimate of the maximum daily and average daily value for each of the listed pollutants (5-Day Biochemical Oxygen Demand, Total Nitrogen, and Total Phosphorus). Estimates may be based on actual data from pilot plants, estimates from engineering studies, data from similar plants, best professional estimates, or other sources. You must state the basis for your estimates using the following codes:

- | | |
|-------------------------------|--|
| 1. Pilot Plant Data | 4. Best Professional Judgment |
| 2. Engineering Study | 5. Other (specify on form or separate sheet) |
| 3. Data from similar facility | |

In the blank spaces, you must provide estimates for any pollutant that you know or have reason to believe is present. Base your determination of whether a pollutant will be present in your discharge on your knowledge of the proposed facility's raw materials, maintenance chemicals, intermediate and final products, byproducts, and any analyses of your effluent or of any similar effluent. You may also provide the estimate based on available in-house reports, contractor's engineering reports, or any other studies performed on the proposed facility. If you expect a pollutant to be present solely as a result of its presence in your intake water, please state this information on the form.

A new discharger will be required to test and report the actual rather than the estimated data for the listed pollutants after the permit is issued and the system is operating.

Effluent Sampling: Wastewater Prior to Land Application - If you land apply wastewater generated at this facility (or you plan to land apply the wastewater), you are required to either report or provide estimates of the concentration for each of the listed pollutants (5-Day Biochemical Oxygen Demand, Total Nitrogen, and Total Phosphorus). Wastewater samples must be taken after treatment or storage and prior to land application. Perform the required sampling (existing dischargers) or estimations (new dischargers) based on the instructions for effluent sampling for wastewater to treatment or storage listed above.

STATEMENT FROM rivers.gov
WEBSITE SHOWING NO WILD OR
SCENIC RIVERS IN IOWA; NONE WILL
BE AFFECTED BY RESPONSIBLE
TRANSPORTATION OPERATIONS

EXHIBIT J



[HOME](#) | [NATIONAL SYSTEM](#) | [MANAGEMENT](#) | [RESOURCES](#) | [PUBLICATIONS](#) | [CONTACT US](#) | [KID'S SITE](#) |

IOWA

Iowa has approximately 70,247 miles of river, but no designated wild & scenic rivers.

Iowa does not have any designated rivers.

Choose a State ▾	Go
Choose a River ▾	Go

*Nourished by the fertile soils of the region,
rivers of the Midwest explode with life, from
great avian migrations to ancient fishes*

[NATION-WIDE RIVERS INVENTORY](#) | [KID'S SITE](#) | [CONTACT US](#) | [PRIVACY NOTICE](#) | [Q & A SEARCH ENGINE](#) | [SITE MAP](#)

4/19/13

Iowa

Designated Rivers

About WSR Act
State Listings
Profile Pages

National System

WSR Table
Study Rivers
Stewardship
WSR Act Legislation

River Management

Council
Agencies
Management Plans
GIS Mapping

Resources

Q & A Search
Bibliography
Publications
GIS Mapping
Logo & Sign Standards
Display

STATEMENT FROM IOWA DEPARTMENT
OF NATURAL RESOURCES REGARDING
KEOKUK COUNTY, SHOWING SPECIAL
CONCERN, THREATENED AND
ENDANGERED SPECIES IN THE
COUNTY. OPERATIONS AT
RESPONSIBLE TRANSPORTATION WOULD
HAVE NO DETRIMENTAL AFFECT ON
ANY LISTED SPECIES.

EXHIBIT K



Natural Areas Inventory

The Iowa Department of Natural Resources

[Back To Query](#)

KEOKUK County, IA

Summary by Species Report

Total Unique Listed Species In This County: 11

County	Common Name	Scientific Name	Class	State Status	Federal Status	Link To Species Profile
KEOKUK	Bald Eagle	Haliaeetus leucocephalus	BIRDS	S		PDF
KEOKUK	Barn Owl	Tyto alba	BIRDS	E		PDF
KEOKUK	Indiana Bat	Myotis sodalis	MAMMALS	E	E	PDF
KEOKUK	Southern Bog Lemming	Synaptomys cooperi	MAMMALS	T		PDF
KEOKUK	Earleaf Foxglove	Tomanthera auriculata	PLANTS (DICOTS)	S		PDF
KEOKUK	Hill's Thistle	Cirsium hillii	PLANTS (DICOTS)	S		PDF
KEOKUK	Spring Avena	Geum vernum	PLANTS (DICOTS)	S		PDF
KEOKUK	Fringed Sedge	Carex crinita	PLANTS (MONOCOTS)	S		PDF
KEOKUK	Slender Ladies'-tresses	Spiranthes lacera	PLANTS (MONOCOTS)	T		PDF
KEOKUK	Virginia Spiderwort	Tradescantia virginiana	PLANTS (MONOCOTS)	S		PDF
KEOKUK	Smooth Green Snake	Liophorophis vernalis	REPTILES	S		PDF

ADDITIONAL LISTING, CHAPTER 77,
IOWA CODE, THREATENED PLANT AND
ANIMAL SPECIES. OPERATIONS AT
RESPONSIBLE TRANSPORTATION
OPERATIONS SHOULD HAVE NO
NEGATIVE AFFECTS ON ANY OF THE
LISTED PLANTS OR ANIMALS

EXHIBIT L

CHAPTER 77
ENDANGERED AND THREATENED PLANT AND ANIMAL SPECIES
[Prior to 12/31/86, Conservation Commission[290], Ch 19]

571—77.1(481B) Definitions. As used in this rule:

"*Endangered species*" means any species of fish, plant life, or wildlife which is in danger of extinction throughout all or a significant part of its range.

"*Special concern species*" means any species about which problems of status or distribution are suspected, but not documented, and for which no special protection is afforded under this rule.

"*Threatened species*" means any species which is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

571—77.2(481B) Endangered, threatened, and special concern animals. The natural resource commission, in consultation with scientists with specialized knowledge and experience, has determined the following animal species to be endangered, threatened or of special concern in Iowa:

77.2(1) Endangered animal species:

Mammals

Indiana Bat	Myotis sodalis
Plains Pocket Mouse	Perognathus flavescens
Red-backed Vole	Clethrionomys gapperi
Spotted Skunk	Spilogale putorius

Birds

Red-shouldered Hawk	Buteo lineatus
Northern Harrier	Circus cyaneus
Piping Plover	Charadrius melodus
Common Barn Owl	Tyto alba
Least Tern	Sterna antillarum
King Rail	Rallus elegans
Short-eared Owl	Asio flammeus

Fish

Lake Sturgeon	Acipenser fulvescens
Pallid Sturgeon	Scaphirhynchus albus
Pugnose Shiner	Notropis anogenus
Weed Shiner	Notropis texanus
Pearl Dace	Semotilus margarita
Freckled Madtom	Noturus nocturnus
Bluntnose Darter	Etheostoma chlorosomum
Least Darter	Etheostoma microperca

Reptiles

Yellow Mud Turtle	Kinosternon flavescens
Wood Turtle	Clemmys insculpta
Great Plains Skink	Eumeces obsoletus
Copperbelly Water Snake	Nerodia erythrogaster neglecta

Western Hognose Snake	Heterodon nasicus
Copperhead	Agkistrodon contortrix
Prairie Rattlesnake	Crotalus viridis
Massasauga Rattlesnake	Sistrurus catenatus

Amphibians

Blue-spotted Salamander	Ambystoma laterale
Crawfish Frog	Rana areolata

Butterflies

Dakota Skipper	Hesperia dacotae
Ringlet	Coenonympha tullia

Land Snails

Iowa Pleistocene Snail	Discus macclintocki
Minnesota Pleistocene Ambersnail	Novisuccinea new species A
Iowa Pleistocene Ambersnail	Novisuccinea new species B
Frigid Ambersnail	Catinella gelida
Briarton Pleistocene Vertigo	Vertigo briarensis
Bluff Vertigo	Vertigo merameccensis
Iowa Pleistocene Vertigo	Vertigo new species

Fresh Water Mussels

Spectacle Case	Cumberlandia monodonta
Slippershell	Alasmodonta viridis
Buckhorn	Tritogonia verrucosa
Ozark Pigtoe	Fusconia ozarkensis
Bullhead	Plethobasus cyphus
Ohio River Pigtoe	Pleurobema sintoxia
Slough Sandshell	Lampsilis teres teres
Yellow Sandshell	Lampsilis teres anodontoides
Higgin's-eye Pearly Mussel	Lampsilis higginsii

77.2(2) Threatened animal species:

Mammals

Least Shrew	Cryptotis parva
Southern Bog Lemming	Synaptomys cooperi

Birds

Long-eared Owl	Asio otus
Henslow's Sparrow	Ammodramus henslowii

Fish

Chestnut Lamprey	Ichthyomyzon castaneus
American Brook Lamprey	Lampetra appendix
Grass Pickerel	Esox americanus
Blacknose Shiner	Notropis heterolepis
Topeka Shiner	Notropis topeka
Western Sand Darter	Ammocrypta clara
Black Redhorse	Moxostoma duquesnei
Burbot	Lota lota
Orangethroat Darter	Etheostoma spectabile

Reptiles

Slender Glass Lizard	Ophisaurus attenuatus
Common Musk Turtle	Sternotherus odoratus
Blanding's Turtle	Emydoidea blandingii
Ornate Box Turtle	Terrapene ornata
Diamondback Water Snake	Nerodia rhombifera
Western Worm Snake	Carphophis amoenus vermis
Speckled Kingsnake	Lampropeltis getulus

Amphibians

Mudpuppy	Necturus maculosus
Central Newt	Notophthalmus viridescens

Butterflies

Poweshiek Skipperling	Oarisma poweshiek
Byssus Skipper	Problema byssus
Mulberry Wing	Poanes massasoit
Silvery Blue	Glaucopsyche lygdamus
Baltimore	Euphydryas phaeton

Snails

Midwest Pleistocene Vertigo	Vertigo hubrichti
Occult Vertigo	Vertigo occulta

Fresh Water Mussels

Cylinder	Anodontoidea ferrussacianus
Strange Floater	Strophitus undulatus
Creek Heelsplitter	Lasmigona compressa
Purple Pimpleback	Cyclonaias tuberculata
Butterfly	Ellipsaria lineolata
Ellipse	Venustaconcha ellipsiformis

77.2(3) *Special concern animal species:*

Mammals

Southern Flying Squirrel

Glaucomys volans

Birds

Forster's Tern

Sterna forsteri

Black Tern

Chlidonias niger

Peregrine Falcon

Falco peregrinus

Bald Eagle

Haliaeetus leucocephalus

Fish

Pugnose Minnow

Notropis emiliae

Pirate Perch

Aphredoderus sayanus

Reptiles

Smooth Green Snake

Opheodrys vernalis

Bullsnake

Pituophis catenifer sayi

Butterflies

Creamy Duskywing

Erynnis icelus

Sleepy Duskywing

Erynnis brizo

Columbine Duskywing

Erynnis lucilius

Wild Indigo Duskywing

Erynnis baptisiae

Ottoe Skipper

Hesperia ottoe

Leonardus Skipper

Hesperia l. leonardus

Pawnee Skipper

Hesperia leonardus pawnee

Beardgrass Skipper

Atrytone arogos

Zabulon Skipper

Poanes zabulon

Broad-winged Skipper

Poanes viator

Sedge Skipper

Euphyes dion

Two-spotted Skipper

Euphyes bimacula

Dusted Skipper

Atrytonopsis hianna

Salt-and-pepper Skipper

Amblyscirtes hegon

Pipevine Swallowtail

Battus philenor

Zebra Swallowtail

Eurytides marcellus

Olympia White

Euchloe olympia

Purplish Copper

Lycena helloides

Acadian Hairstreak

Satyrium acadicum

Edward's Hairstreak

Satyrium edwardsii

Hickory Hairstreak

Satyrium caryaevorum

Striped Hairstreak

Satyrium liparops

Swamp Metalmark

Calephelis mutica

Regal Fritillary

Speyeria idalia

Baltimore

Euphydryas phaeton ozarkae

[ARC 8105B, IAB 9/9/09, effective 10/14/09]

571—77.3(481B) Endangered, threatened, and special concern plants. The natural resource commission, in consultation with scientists with special knowledge and experience, determined the following plant species to be endangered, threatened, or of special concern in Iowa.

77.3(1) *Endangered plant species:*

COMMON NAME	SCIENTIFIC NAME
Pale false foxglove	<i>Agalinus skinneriana</i>
Blue giant-hyssop	<i>Agastache foeniculum</i>
Bearberry	<i>Arctostaphylos uva-ursi</i>
Black chokeberry	<i>Aronia melanocarpa</i>
Eared milkweed	<i>Asclepias engelmanniana</i>
Mead's milkweed	<i>Asclepias meadii</i>
Narrow-leaved milkweed	<i>Asclepias stenophylla</i>
Ricebutton aster	<i>Aster dumosus</i>
Large-leaved aster	<i>Aster macrophyllus</i>
Schreber's aster	<i>Aster schreberi</i>
Fern-leaved false foxglove	<i>Aureolaria pedicularia</i>
Matricary grape fern	<i>Botrychium matricariifolium</i>
Poppy mallow	<i>Callirhoe triangulata</i>
Cordroot sedge	<i>Carex chordorrhiza</i>
Large-bracted corydalis	<i>Corydalis curvisiliqua</i>
Silky prairie-clover	<i>Dalea villosa</i>
Swamp-loosestrife	<i>Decodon verticillatus</i>
Northern panic-grass	<i>Dichanthelium boreale</i>
Roundleaved sundew	<i>Drosera rotundifolia</i>
False mermaid	<i>Floerkea proserpinacoides</i>
Bog bedstraw	<i>Galium labradoricum</i>
Povertygrass	<i>Hudsonia tomentosa</i>
Northern St. Johnswort	<i>Hypericum boreale</i>
Pineweed	<i>Hypericum gentianoides</i>
Winterberry	<i>Ilex verticillata</i>
Black-based quillwort	<i>Isoetes melanopoda</i>
Water-willow	<i>Justicia americana</i>
Dwarf dandelion	<i>Krigia virginica</i>
Cleft conebca	<i>Leucospora multifida</i>
Whiskbroom parsley	<i>Lomatium foeniculaceum</i>
Running clubmoss	<i>Lycopodium clavatum</i>
Bog clubmoss	<i>Lycopodium inundatum</i>
Annual skeletonweed	<i>Lygodesmia rostrata</i>
Water marigold	<i>Megalodonta beckii</i>
Northern lungwort	<i>Mertensia paniculata</i>
Bigroot pricklypear	<i>Opuntia macrorhiza</i>
Clustered broomrape	<i>Orobanche fasciculata</i>
Ricegrass	<i>Oryzopsis pungens</i>
Cinnamon fern	<i>Osmunda cinnamomea</i>
Purple cliffbrake	<i>Pellaea atropurpurea</i>

Arrow arum	Peltandra virginica
Pale green orchid	Platanthera flava
Eastern prairie fringed orchid	Platanthera leucophaca
Clammyweed	Polansia jamesii
Crossleaf milkwort	Polygala cruciata
Purple milkwort	Polygala polygama
Jointweed	Polygonella articulata
Douglas' knotweed	Polygonum douglasii
Three-toothed cinquefoil	Potentilla tridentata
Canada plum	Prunus nigra
Frenchgrass	Psoralea onobrychis
Pink shinleaf	Pyrola asarifolia
Prickly rose	Rosa acicularis
Meadow spikemoss	Selaginella eclipses
Rough-leaved goldenrod	Solidago patula
Bog goldenrod	Solidago uliginosa
Yellow-lipped ladies-tresses	Spiranthes lucida
Pickering morning-glory	Stylisma pickeringii
Rough-seeded fameflower	Talinum rugospermum
Waxy meadowrue	Thalictrum revolutum
Long beechfern	Thelypteris phegopteris
Large-leaved violet	Viola incognita
Rusty woodsia	Woodsia ilvensis
Yellow-eyed grass	Xyris torta

77.3(2) Threatened plant species:

Northern wild monkshood	Aconitum noveboracense
Round-stemmed false foxglove	Agalinus gattingerii
Nodding wild onion	Allium cernuum
Fragrant false indigo	Anorpha nana
Virginia snakeroot	Aristolochia serpentaria
Woolly milkweed	Asclepias lanuginosa
Showy milkweed	Asclepias speciosa
Forked aster	Aster furcatus
Rush aster	Aster junciformis
Flax-leaved aster	Aster linariifolius
Water parsnip	Berula erecta
Kittentails	Besseyia bullii
Bog birch	Betula pumila
Pagoda plant	Blephilia ciliata
Leathery grapefern	Botrychium multifidum
Little grapefern	Botrychium simplex
Sweet Indian-plantain	Cacalia suaveolens
Poppy mallow	Callirhoe alcaeoides
Pipsissewa	Chimaphila umbellata

Golden saxifrage	<i>Chrysosplenium toowense</i>
Dayflower	<i>Commelina erecta</i>
Spotted coralroot	<i>Corallorhiza maculata</i>
Bunchberry	<i>Cornus canadensis</i>
Golden corydalis	<i>Corydalis aurea</i>
Pink corydalis	<i>Corydalis sempervirens</i>
Showy lady's-slipper	<i>Cypripedium reginae</i>
Slim-leaved panic-grass	<i>Dichanthelium linearifolium</i>
Jeweled shooting star	<i>Dodecatheon amethystinum</i>
Glandular wood fern	<i>Dryopteris intermedia</i>
Marginal shield fern	<i>Dryopteris marginalis</i>
Woodland horsetail	<i>Equisetum sylvaticum</i>
Slender cottongrass	<i>Eriophorum gracile</i>
Yellow trout lily	<i>Erythronium americanum</i>
Queen of the prairie	<i>Filipendula rubra</i>
Blue ash	<i>Fraxinus quadrangulata</i>
Black huckleberry	<i>Gaylussacia baccata</i>
Oak fern	<i>Gymnocarpium dryopteris</i>
Green violet	<i>Hybanthus concolor</i>
Twinleaf	<i>Jeffersonia diphylla</i>
Creeping juniper	<i>Juniperus horizontalis</i>
Intermediate pinweed	<i>Lechea intermedia</i>
Hairy pinweed	<i>Lechea villosa</i>
Prairie bush clover	<i>Lespedeza leptostachya</i>
Twinflower	<i>Linnaea borealis</i>
Western parsley	<i>Lomatium orientale</i>
Wild lupine	<i>Lupinus perennis</i>
Tree clubmoss	<i>Lycopodium dendroideum</i>
Rock clubmoss	<i>Lycopodium porophyllum</i>
Hairy waterclover	<i>Marsilea vestita</i>
Bog buckbean	<i>Menyanthes trifoliata</i>
Winged monkeyflower	<i>Mimulus alatus</i>
Yellow monkeyflower	<i>Mimulus glabratus</i>
Partridge berry	<i>Mitchella repens</i>
Pinesap	<i>Monotropa hypopithys</i>
Small sundrops	<i>Oenothera perennis</i>
Little pricklypear	<i>Opuntia fragilis</i>
Royal fern	<i>Osmunda regalis</i>
Philadelphia panic-grass	<i>Panicum philadelphicum</i>
Slender beardtongue	<i>Penstemon gracilis</i>
Hooker's orchid	<i>Platanthera hookeri</i>
Northern bog orchid	<i>Platanthera hyperborea</i>
Western prairie fringed orchid	<i>Platanthera praecleara</i>
Purple fringed orchid	<i>Platanthera psycodes</i>
Pink milkwort	<i>Polygala incarnata</i>

Silverweed	Potentilla anserina
Shrubby cinquefoil	Potentilla fruticosa
Pennsylvania cinquefoil	Potentilla pensylvanica
One-sided shinleaf	Pyrola secunda
Meadow beauty	Rhexia virginica
Beaked rush	Rhynchospora capillacea
Northern currant	Ribes hudsonianum
Shining willow	Salix lucida
Bog willow	Salix pedicellaris
Low nutrush	Scleria verticillata
Buffaloberry	Shepherdia argentea
Scarlet globemallow	Sphaeralcea coccinea
Slender ladies-tresses	Spiranthes lacera
Oval ladies-tresses	Spiranthes ovalis
Hooded ladies-tresses	Spiranthes romanzoffiana
Spring ladies-tresses	Spiranthes vernalis
Rosy twisted-stalk	Streptopus roseus
Fameflower	Talinum parviflorum
Large arrowgrass	Triglochin maritimum
Small arrowgrass	Triglochin palustre
Low sweet blueberry	Vaccinium angustifolium
Velvetleaf blueberry	Vaccinium myrtilloides
False hellebore	Veratrum woodii
Kidney-leaved violet	Viola renifolia
Oregon woodsia	Woodsia oregana

77.3(3) *Special concern plant species:*

Balsam fir	Abies balsamea
Three-seeded mercury	Acalypha gracilens
Three-seeded mercury	Acalypha ostryifolia
Mountain maple	Acer spicatum
Moschatel	Adoxa moschatellina
Water plantain	Alisma gramineum
Wild onion	Allium mutabile
Amaranth	Amaranthus arenicola
Lanceleaf ragweed	Ambrosia bidentata
Saskatoon serviceberry	Amelanchier alnifolia
Low serviceberry	Amelanchier sanguinea
Raccoon grape	Annelopsis cordata
Pearly everlasting	Anaphalis margaritacea
Sand bluestem	Andropogon hallii
Broomsedge	Andropogon virginicus
Purple angelica	Angelica atropurpurea
Purple rockcress	Arabis divaricata
Green rockcress	Arabis missouriensis

Lakecress	<i>Amoracia lacustris</i>
Fringed sagewort	<i>Artemisia frigida</i>
Common mugwort	<i>Artemisia vulgaris</i>
Pawpaw	<i>Asimina triloba</i>
Curved aster	<i>Aster falcatus</i>
Hairy aster	<i>Aster pubentior</i>
Prairie aster	<i>Aster turbinellus</i>
Standing milkvetch	<i>Astragalus adsurgens</i>
Bent milkvetch	<i>Astragalus distortus</i>
Missouri milkvetch	<i>Astragalus missouriensis</i>
Blue wild indigo	<i>Baptisia australis</i>
Yellow wild indigo	<i>Baptisia tinctoria</i>
Prairie moonwort	<i>Botrychium campestre</i>
Watershield	<i>Brasenia schreberi</i>
Buffalograss	<i>Buchloe dactyloides</i>
Poppy mallow	<i>Callirhoe papaver</i>
Water-starwort	<i>Callitriche heterophylla</i>
Grass pink	<i>Calopogon tuberosus</i>
Low bindweed	<i>Calystegia spithamea</i>
Clustered sedge	<i>Carex aggregata</i>
Back's sedge	<i>Carex backii</i>
Bush's sedge	<i>Carex bushii</i>
Carey's sedge	<i>Carex careyana</i>
Flowerhead sedge	<i>Carex cephalantha</i>
Field sedge	<i>Carex conoides</i>
Crawe's sedge	<i>Carex crawei</i>
Fringed sedge	<i>Carex crinita</i>
Double sedge	<i>Carex diandra</i>
Douglas' sedge	<i>Carex douglasii</i>
Dry sedge	<i>Carex focka</i>
Thin sedge	<i>Carex gracilescens</i>
Delicate sedge	<i>Carex leptalea</i>
Mud sedge	<i>Carex limosa</i>
Hoplike sedge	<i>Carex lupuliformis</i>
Yellow sedge	<i>Carex lurida</i>
Intermediate sedge	<i>Carex media</i>
Backward sedge	<i>Carex retroflexa</i>
Richardson's sedge	<i>Carex richardsonii</i>
Rocky Mountain sedge	<i>Carex saximontana</i>
Sterile sedge	<i>Carex sterilis</i>
Soft sedge	<i>Carex tenera</i>
Deep green sedge	<i>Carex tosa</i>
Tuckerman's sedge	<i>Carex tuckermanii</i>
Umbrella sedge	<i>Carex umbellata</i>
Wild oats	<i>Chasmanthium latifolium</i>

Pink turtlehead	<i>Chelone obliqua</i>
Fogg's goosefoot	<i>Chenopodium foggii</i>
Missouri goosefoot	<i>Chenopodium missouriensis</i>
Coast blite	<i>Chenopodium rubrum</i>
Bugbane	<i>Cimicifuga racemosa</i>
Hill's thistle	<i>Cirsium hillii</i>
Swamp thistle	<i>Cirsium muticum</i>
Wavy-leaved thistle	<i>Cirsium undulatum</i>
Western clematis	<i>Clematis occidentalis</i>
Blue-eyed Mary	<i>Collinsia verna</i>
Cancer-root	<i>Conopholis americana</i>
Fireberry hawthorn	<i>Crataegus chrysocarpa</i>
Red hawthorn	<i>Crataegus coccinea</i>
Two-fruited hawthorn	<i>Crataegus disperma</i>
Hawthorn	<i>Crataegus pruinosa</i>
Hawksbeard	<i>Crepis runcinata</i>
Prairie tea	<i>Croton monanthogynus</i>
Crotonopsis	<i>Crotonopsis elliptica</i>
Waxweed	<i>Cuphea viscosissima</i>
Dodder	<i>Cuscuta indecora</i>
Small white lady's-slipper	<i>Cypripedium candidum</i>
Carolina larkspur	<i>Delphinium carolinianum</i>
Sessile-leaved tick trefoil	<i>Desmodium sessilifolium</i>
Fingergrass	<i>Digitaria filiformis</i>
Buttonweed	<i>Diodia teres</i>
Purple coneflower	<i>Echinacea purpurea</i>
Waterwort	<i>Elatine triandra</i>
Purple spikerush	<i>Eleocharis atropurpurea</i>
Green spikerush	<i>Eleocharis olivacea</i>
Oval spikerush	<i>Eleocharis ovata</i>
Dwarf spikerush	<i>Eleocharis parvula</i>
Few-flowered spikerush	<i>Eleocharis pauciflora</i>
Wolf's spikerush	<i>Eleocharis wolffii</i>
Interrupted wildrye	<i>Elymus interruptus</i>
Dwarf scouring rush	<i>Equisetum scirpoides</i>
Ponygrass	<i>Eragrostis reptans</i>
Tall cottongrass	<i>Eriophorum angustifolium</i>
Tawny cottongrass	<i>Eriophorum virginicum</i>
Upland boneset	<i>Eupatorium sessilifolium</i>
Spurge	<i>Euphorbia commutata</i>
Missouri spurge	<i>Euphorbia missurica</i>
Slender fimbriatylis	<i>Fimbristylis autumnalis</i>
Umbrella grass	<i>Fuirena simplex</i>
Rough bedstraw	<i>Galium asprellum</i>
Small fringed gentian	<i>Gentianopsis procera</i>

Northern cranesbill	<i>Geranium bicknellii</i>
Spring avens	<i>Geum vernum</i>
Early cudweed	<i>Gnaphalium purpureum</i>
Limestone oak fern	<i>Gymnocarpium robertianum</i>
Bitterweed	<i>Helenium amarum</i>
Mud plantain	<i>Heteranthera limosa</i>
Water stargrass	<i>Heteranthera reniformis</i>
Hairy goldenaster	<i>Heterotheca villosa</i>
Common mare's-tail	<i>Hippuris vulgaris</i>
Canadian St. Johnswort	<i>Hypericum canadense</i>
Drummond St. Johnswort	<i>Hypericum drummondii</i>
White morning glory	<i>Ipomoea lacunosa</i>
Sumpweed	<i>Iva annua</i>
Alpine rush	<i>Juncus alpinus</i>
Toad rush	<i>Juncus bufonius</i>
Soft rush	<i>Juncus effusus</i>
Green rush	<i>Juncus greenii</i>
Edged rush	<i>Juncus marginatus</i>
Vasey's rush	<i>Juncus vaseyi</i>
Potato dandelion	<i>Krigia dandelion</i>
Pinweed	<i>Lechea racemulosa</i>
Duckweed	<i>Lemna perpusilla</i>
Creeping bush clover	<i>Lespedeza repens</i>
Silvery bladder-pod	<i>Lesquerella ludoviciana</i>
Wild flax	<i>Linum medium</i>
Brook lobelia	<i>Lobelia kalmii</i>
False loosestrife	<i>Ludwigia peploides</i>
Crowfoot clubmoss	<i>Lycopodium digitatum</i>
Adder's-mouth orchid	<i>Malaxis unifolia</i>
Globe mallow	<i>Malvastrum hispidum</i>
Two-flowered melic-grass	<i>Melica nutica</i>
Ten-petaled blazingstar	<i>Mentzelia decapetala</i>
Millet grass	<i>Milium effusum</i>
Rock sandwort	<i>Minuartia michauxii</i>
Naked mitrewort	<i>Mitella nuda</i>
Scratchgrass	<i>Muhlenbergia asperifolia</i>
Water milfoil	<i>Myriophyllum heterophyllum</i>
Rough water milfoil	<i>Myriophyllum pinnatum</i>
Water milfoil	<i>Myriophyllum verticillatum</i>
Glade mallow	<i>Napaea dioica</i>
Showy evening primrose	<i>Oenothera speciosa</i>
Northern adders-tongue fern	<i>Ophioglossum vulgatum</i>
Louisiana broomrape	<i>Orobanche ludoviciana</i>
Mountain ricegrass	<i>Oryzopsis asperifolia</i>
Gattinger's panic-grass	<i>Panicum gattingeri</i>

White beardtongue	<i>Penstemon albidus</i>
Cobaea penstemon	<i>Penstemon cobaea</i>
Tube penstemon	<i>Penstemon tubiflorus</i>
Cleft phlox	<i>Phlox bifida</i>
Annual ground cherry	<i>Physalis pubescens</i>
Heart-leaved plantain	<i>Plantago cordata</i>
Wood orchid	<i>Platanthera clavellata</i>
Green fringed orchid	<i>Platanthera lacera</i>
Plains bluegrass	<i>Poa arida</i>
Chapman's bluegrass	<i>Poa chapmaniana</i>
Weak bluegrass	<i>Poa languida</i>
Bog bluegrass	<i>Poa paludigena</i>
Meadow bluegrass	<i>Poa wolffii</i>
Hairy Solomon's-seal	<i>Polygonatum pubescens</i>
Large-leaved pondweed	<i>Potamogeton amplifolius</i>
Ribbonleaf pondweed	<i>Potamogeton epihydrus</i>
White-stemmed pondweed	<i>Potamogeton praelongus</i>
Spiralled pondweed	<i>Potamogeton spirillus</i>
Tussock pondweed	<i>Potamogeton strictifolius</i>
Vasey's pondweed	<i>Potamogeton vaseyi</i>
Bird's-eye primrose	<i>Primula mistassinica</i>
Prionopsis	<i>Prionopsis ciliata</i>
Mermaid weed	<i>Proserpinaca palustris</i>
Dwarf cherry	<i>Prunus besseyi</i>
Hortalan plum	<i>Prunus hortulana</i>
Sand cherry	<i>Prunus pumila</i>
Lemon scurpea	<i>Psoralea lanceolata</i>
Crowfoot	<i>Ranunculus circinatus</i>
Gmelin's crowfoot	<i>Ranunculus gmelinii</i>
Buckthorn	<i>Rhamnus alnifolia</i>
Dwarf sumac	<i>Rhus copallina</i>
Northern gooseberry	<i>Ribes hirtellum</i>
Yellow cress	<i>Rorippa sinuata</i>
Swamp rose	<i>Rosa palustris</i>
Tooth-cup	<i>Rotala ramosior</i>
Dewberry	<i>Rubus hispidus</i>
Western dock	<i>Rumex occidentalis</i>
Widgeon grass	<i>Ruppia maritima</i>
Prairie rose gentian	<i>Sabatia campestris</i>
Sage willow	<i>Salix candida</i>
Sassafras	<i>Sassafras albidum</i>
Tumblegrass	<i>Schedonnardus paniculatus</i>
Scheuchzeria	<i>Scheuchzeria palustris</i>
Sensitive briar	<i>Schrankia nuttallii</i>
Hall's bulrush	<i>Scirpus hallii</i>

Prairie bulrush	<i>Scirpus maritimus</i>
Pedicelled bulrush	<i>Scirpus pedicellatus</i>
Smith's bulrush	<i>Scirpus smithii</i>
Torrey's bulrush	<i>Scirpus torreyi</i>
Veiny skullcap	<i>Scutellaria nervosa</i>
Wild stonecrop	<i>Sedum ternatum</i>
Rock spikemoss	<i>Selaginella rupestris</i>
Butterweed	<i>Senecio glabellus</i>
False golden ragwort	<i>Senecio pseud aureus</i>
Knotweed bristlegrass	<i>Setaria geniculata</i>
Virginia rockcress	<i>Sibara virginica</i>
Prairie dock	<i>Silphium terebinthinaceum</i>
Burreed	<i>Sparganium angustifolium</i>
Great plains ladies-tresses	<i>Spiranthes magnicamporum</i>
Clandestine dropseed	<i>Sporobolus clandestinus</i>
Rough hedge-nettle	<i>Stachys aspera</i>
Needle-and-thread	<i>Stipa comata</i>
White coralberry	<i>Symphoricarpos albus</i>
Eared false foxglove	<i>Tomanthera auriculata</i>
Spiderwort	<i>Tradescantia virginiana</i>
Humped bladderwort	<i>Utricularia gibba</i>
Flat-leaved bladderwort	<i>Utricularia intermedia</i>
Small bladderwort	<i>Utricularia minor</i>
Valerian	<i>Valeriana edulis</i>
American brookline	<i>Veronica americana</i>
Marsh speedwell	<i>Veronica scutellata</i>
Maple-leaved arrowwood	<i>Viburnum acerifolium</i>
Black arrowwood	<i>Viburnum molle</i>
Black haw	<i>Viburnum prunifolium</i>
Spurred violet	<i>Viola adunca</i>
Lance-leaved violet	<i>Viola lanceolata</i>
Macloskey's violet	<i>Viola macloskeyi</i>
Pale violet	<i>Viola striata</i>
Summer grape	<i>Vitis aestivalis</i>
Frost grape	<i>Vitis vulpina</i>

571—77.4(481B) Exemptions. Notwithstanding the foregoing list and the prohibitions in Iowa Code chapter 481B, a person may import, export, possess, transport, purchase, barter, buy, sell, offer to sell, hold for processing or process a species of animal or plant which is listed as endangered or threatened on the state list or as listed in the Code of Federal Regulations, Title 50, part 17, as amended to December 30, 1991, according to the following rules:

77.4(1) Trophies lawfully taken by persons licensed to hunt or fish (not including trapping or commercial harvest licenses) in another state, country or territory may be brought into this state and possessed, held for processing and processed but may not be sold or offered for sale.

77.4(2) Furs or skins of wildlife species appearing on the state list of endangered and threatened species which were lawfully taken or purchased in another state, country or territory may be imported,

exported, purchased, possessed, bartered, offered for sale, sold, held for processing, or processed in this state if they are tagged or permanently marked by the state, country, or territory of origin.

77.4(3) Species of live animals appearing on the state list of endangered and threatened species may be imported, exported, possessed, purchased, bartered, offered for sale, or sold under the terms of a scientific collecting permit or educational project permit issued pursuant to Iowa Code section 481A.6 and administrative rules adopted by the department.

77.4(4) Plants, seeds, roots, and other parts of plants which appear on the state list of endangered and threatened plants which were lawfully taken or purchased in another state, country or territory may be imported, exported, purchased, possessed, offered for sale or sold in this state.

77.4(5) A part or product of a species of fish or wildlife appearing on the state list of endangered or threatened species which enters the state from another state or from a point outside the territorial limits of the United States may enter, be transported, exported, possessed, sold, offered for sale, held for processing or processed in accordance with the terms of a permit issued by the agency of jurisdiction in the state of origin or, if entering from outside the United States, a federal permit issued by the United States government. If proper documentation is available, a person may buy or offer to buy a part or product of a species of fish or wildlife appearing on the state or federal lists as long as it is imported from a legal source outside this state and proper documentation is provided.

77.4(6) If a person possesses a species of fish or wildlife or a part, product or offspring of such a species, proper documentation such as receipt of purchase and the permit from the state of origin or the U.S. government must be presented upon request of any conservation officer. Failure to produce such documentation is a violation of this chapter and will constitute grounds for forfeiture to the Iowa DNR.

77.4(7) A species of plant, fish or wildlife appearing on the state list of endangered and threatened species may be collected, held, salvaged and possessed under the terms of a scientific collecting permit issued pursuant to Iowa Code section 481A.6 and administrative rules adopted by the department.

77.4(8) Drainage district repairs and improvements to existing open ditch facilities are excluded from the department's protection efforts for the Topeka shiner. This includes facilities of levee and drainage districts established and maintained under Iowa Code chapter 468. This exclusion does not apply to new channelization, deepening, or leveeing of existing streams and rivers with permanent flow or existing streams with off-channel water areas capable of supporting fish.

77.4(9) The department may enter into an agreement with a private landowner for habitat improvements that benefit endangered and threatened species while limiting the potential impacts to the landowner arising when a covered species becomes more numerous due to the voluntary improvements to the habitat. If any covered species becomes more numerous as a result of the landowner's voluntary actions, a private landowner who commits to implement voluntary conservation measures for a listed species will not be required to implement additional measures, and additional land, water, or resource use restrictions will not be imposed.

a. The department will provide participating landowners with technical assistance to develop landowner incentive program agreements. Each agreement shall include the following:

1. Landowner's name.
2. Legal description of the property covered by the agreement.
3. Length of agreement period.
4. Species covered by the agreement.
5. Baseline conditions: the estimated number of listed species and the size and condition of habitat for each species covered.
6. Conservation measures to be implemented and implementation schedule.
7. Financial commitment of the department and the landowner.
8. Measures to determine if the agreement has been fulfilled.
9. Any property use restrictions.
10. Terms for the termination of the agreement prior to its scheduled expiration.

b. The landowner, through normal lawful activities, may return the property to the baseline or a mutually agreed-upon condition above the baseline at any time after expiration of the landowner incentive program agreement.

This rule is intended to implement Iowa Code chapter 481B.

[Filed 8/31/77, Notice 7/27/77—published 9/21/77, effective 10/26/77]

[Filed 11/2/84, Notice 8/1/84—published 11/21/84, effective 1/1/85]

[Filed without Notice 12/12/86—published 12/31/86, effective 2/4/87]

[Filed 11/10/88, Notice 8/24/88—published 11/30/88, effective 1/4/89]

[Filed 2/11/94, Notice 10/27/93—published 3/2/94, effective 4/6/94]

[Filed 12/10/99, Notice 6/2/99—published 12/29/99, effective 2/2/00]

[Filed 12/19/01, Notice 10/31/01—published 1/9/02, effective 2/13/02]

[Filed 11/19/03, Notice 9/3/03—published 12/10/03, effective 1/14/04]

[Filed 5/20/04, Notice 3/31/04—published 6/9/04, effective 7/14/04]

[Filed ARC 8105B (Notice ARC 7856B, IAB 6/17/09), IAB 9/9/09, effective 10/14/09]

ADDITIONAL LISTING, U.S. FISH AND
WILDLIFE SERVICE ENDANGERED AND
THREATENED SPECIES IN IOWA. NONE
WILL BE ADVERSELY AFFECTED BY
OPERATIONS AT RESPONSIBLE
TRANSPORTATION

EXHIBIT M



Species Reports

Environmental Conservation Online System

(<http://www.fws.gov>)
Listings and occurrences for Iowa

Notes:

- This report shows the listed species associated in some way with this state.
- This list does not include experimental populations and similarity of appearance listings.
- This list includes non-nesting sea turtles and whales in State/Territory coastal waters.
- This list includes species or populations under the sole jurisdiction of the National Marine Fisheries Service.
- Click on the highlighted scientific names below to view a Species Profile for each listing.

Summary of Animals listings

Animal species listed in this state and that occur in this state (9 species)

Status

([javascript:launch\('/tess_public/html/db-Species
status.html'\)](#));

E	Bat, Indiana Entire (<i>Myotis sodalis</i>) (/speciesProfile/profile/speciesProfile.action?scode=A000)
E	Higgins eye (pearlymussel) Entire (<i>Lampsilis higginsii</i>) (/speciesProfile/profile/speciesProfile.action?scode=F009)
E	Mussel, sheepnose (<i>Plethobasus cyphus</i>) (/speciesProfile/profile/speciesProfile.action?scode=F046)
T	Plover, piping except Great Lakes watershed (<i>Charadrius melodus</i>) (/speciesProfile/profile/speciesProfile.action?scode=B079)
E	Shiner, Topeka Entire (<i>Notropis topeka (=tristis)</i>) (/speciesProfile/profile/speciesProfile.action?scode=E07R)
E	Snail, Iowa Pleistocene Entire (<i>Discus macclintocki</i>) (/speciesProfile/profile/speciesProfile.action?scode=G00T)
E	Spectaclecase (mussel) (<i>Cumberlandia monodonta</i>) (/speciesProfile/profile/speciesProfile.action?scode=F00X)
E	Sturgeon, pallid Entire (<i>Scaphirhynchus albus</i>) (/speciesProfile/profile/speciesProfile.action?scode=E06X)
E	Tern, least interior pop. (<i>Sterna antillarum</i>) (/speciesProfile/profile/speciesProfile.action?scode=B07N)

Animal species listed in this state that do not occur in this state (7 species)

Status

([javascript:launch\('/tess_public/html/db-Species
status.html'\)](#));

E	Beetle, American burying Entire (<i>Nicrophorus americanus</i>)
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[\(/speciesProfile/profile/speciesProfile.action?scode=I028\)](/speciesProfile/profile/speciesProfile.action?scode=I028)

Mapleleaf, winged Entire; except where listed as experimental populations

[\(*Quadrula fragosa* \(/speciesProfile/profile/speciesProfile.action?scode=F00C\)\)](/speciesProfile/profile/speciesProfile.action?scode=F00C)

Mussel, scaleshell (*Leptodea leptodon*

[\(/speciesProfile/profile/speciesProfile.action?scode=F00W\)\)](/speciesProfile/profile/speciesProfile.action?scode=F00W)

Mussel, snuffbox (*Epiblasma triquetra*

[\(/speciesProfile/profile/speciesProfile.action?scode=F03J\)\)](/speciesProfile/profile/speciesProfile.action?scode=F03J)

Pimpleback, orangefoot (pearlymussel) (*Plethobasus cooperianus*

[\(/speciesProfile/profile/speciesProfile.action?scode=F00R\)\)](/speciesProfile/profile/speciesProfile.action?scode=F00R)

Pocketbook, fat Entire (*Potamilus capax*

[\(/speciesProfile/profile/speciesProfile.action?scode=F00T\)\)](/speciesProfile/profile/speciesProfile.action?scode=F00T)

Wolf, gray U.S.A.: All of AL, AR, CA, CO, CT, DE, FL, GA, KS, KY, LA, MA, MD, ME, MO, MS, NC, NE, NH, NJ, NV, NY, OK, PA, RI, SC, TN, VA, VT and WV; those portions of AZ, NM, and TX not included in an experimental population; and portions of IA, IN, IL, ND, OH, OR, SD, UT, and WA. Mexico. (*Canis lupus*

[\(/speciesProfile/profile/speciesProfile.action?scode=A00D\)\)](/speciesProfile/profile/speciesProfile.action?scode=A00D)

Summary of Plant listings

Plant species listed in this state and that occur in this state (5 species)

Status

[\(javascript:launch\('/tess_public/html/db-Species/status.html'\)\)](#)

Bush-clover, prairie (*Lespedeza leptostachya*

[\(/speciesProfile/profile/speciesProfile.action?scode=Q2CB\)\)](/speciesProfile/profile/speciesProfile.action?scode=Q2CB)

Milkweed, Mead's (*Asclepias meadii*

[\(/speciesProfile/profile/speciesProfile.action?scode=Q1T6\)\)](/speciesProfile/profile/speciesProfile.action?scode=Q1T6)

Monkshood, northern wild (*Aconitum noveboracense*

[\(/speciesProfile/profile/speciesProfile.action?scode=Q1SN\)\)](/speciesProfile/profile/speciesProfile.action?scode=Q1SN)

Orchid, eastern prairie fringed (*Platanthera leucophaea*

[\(/speciesProfile/profile/speciesProfile.action?scode=Q2GG\)\)](/speciesProfile/profile/speciesProfile.action?scode=Q2GG)

Orchid, western prairie fringed (*Platanthera praecleara*

[\(/speciesProfile/profile/speciesProfile.action?scode=Q2YD\)\)](/speciesProfile/profile/speciesProfile.action?scode=Q2YD)

Last updated: April 19, 2013

[ECOS Home \(/ecos/indexPublic.do\)](/ecos/indexPublic.do) | [Contact Us \(/ecos/helpdesk.do?version=TESS_PUBLIC-1_1_13\)](/ecos/helpdesk.do?version=TESS_PUBLIC-1_1_13)

RESPONSIBLE TRANSPORTATION
DEVELOPING FOOD DEFENSE PLAN.
(INCOMPLETE AT THIS TIME)

EXHIBIT N



**U.S. Department of Agriculture
Food Safety and Inspection Service**

**DEVELOPING A FOOD DEFENSE PLAN
FOR
MEAT AND POULTRY
SLAUGHTER AND PROCESSING PLANTS**

**JANUARY 2007
(UPDATED JUNE 2008)**

**BY COMPLETING PAGES 13 THROUGH 16 IN THIS GUIDE, SLAUGHTER
AND PROCESSING PLANTS WILL HAVE A FOOD DEFENSE PLAN FOR
THEIR OPERATION**

What is Food Defense?

Food defense is *not* the same as food safety. Food defense focuses on protecting the food supply from intentional contamination, with a variety of chemicals, biological agents or other harmful substances by people who want to do us harm. These agents could include materials that are not naturally-occurring or are not routinely tested for. An attacker's goal might be to kill people or disrupt our economy. Intentional acts are generally not reasonable and are hard to predict.

Food safety addresses the accidental contamination of food products during processing or storage by biological, chemical or physical hazards. The main types of food safety hazards are microbes, chemicals and foreign objects. This unintentional contamination of food products can be reasonably anticipated based on the type of processing. This principle is the foundation of the Hazard Analysis Critical Control Point (HACCP) process used to ensure food safety.

Who Might Adulterate a Food Product?

The table below lists some examples of the types of individuals who might be motivated to adulterate food products. You should contact your local law enforcement community for additional information about potential local threats to your facility.

Examples of Potential Internal and External Threats

Internal	External
Disgruntled employee	Organized terrorist or activist groups
Cleaning crew	Truck drivers (shipping and receiving)
Contractors	Contractors
Temporary employees	Suspect suppliers
Members of terrorist groups posing as employees	Visitors

Individuals motivated to attack a plant/product that do not have authorized access are considered to be intruders. Another threat may come from an internal source, such as disgruntled employees and other insiders, who typically know what procedures are followed in the plant and often know how to bypass many security controls that would detect or delay an outside intruder.

Why Develop a Food Defense Plan?

A Food Defense Plan helps you identify steps you can take to minimize the risk that food products in your establishment will be intentionally contaminated or tampered with. A plan increases preparedness. Although the plan should be in place at all times, it may be particularly helpful during emergencies. During a crisis, when stress is high and response time is at a premium, a documented set of procedures improves your ability to respond quickly. **A Food Defense Plan will help you maintain a safe working environment for your employees, provide a quality product to your customers, and protect your bottom line.**

Note that because of the differences between food safety and food defense your plant's HACCP plan should not be used as a substitute for a Food Defense Plan because not all of the Critical Control Points will be the same. **However, creating a Food Defense Plan does not require development of another HACCP-type document. Some of the information you may use to create a plan will possibly exist in your HACCP plan, SSOPs, and other documents such as emergency response procedures.** Make sure to consult these documents for information. There is no need to "reinvent the wheel" when developing your Food Defense Plan.

To help plants, USDA's Food Safety Inspection Service (FSIS) has created this guide to assist you in developing a cost-effective Food Defense Plan for your facility. This guide was developed in consultation with very small, small and large meat and poultry processing establishments in an attempt to ensure that the information presented is beneficial, practical and achievable.

By using this guide, you will be able to develop a food defense plan specific to your facility. **Complete Pages 13 through 16 and you will have your functional plan.** Keep in mind that not all of the guidance contained in this document may be appropriate or practical for every FSIS regulated facility. FSIS recommends you review the guidance and assess which preventive measures are suitable for your operation. You should determine the most cost-effective way to achieve food defense goals based on your plant's situation. **It is important to remember that there is no "one size fits all" approach to creating your Food Defense Plan. The plan can be as long or as short as is appropriate for your operation.**

Steps in Developing a Food Defense Plan

FSIS recommends using the following three steps when developing a Food Defense Plan. If you follow and complete these steps and use the forms provided as a template, you will have developed a food defense plan for your facility.

Should you need help using or have questions about this guidance, please contact the FSIS Policy Development Division at 1-800-233-3935 or AskFSIS@fsis.usda.gov.

Step 1 – Conduct a Food Defense Assessment

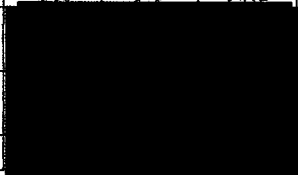
Begin by choosing a person or team to be responsible for the security of your plant. The team or responsible person will answer the questions in the assessment below to help you understand which parts of your facility may be more vulnerable. When completing this assessment remember to consider both potential internal and external threats. The results of the assessment should be kept confidential so that they do not provide a roadmap for future attacks.

To use the following Facility Food Defense Assessment, read each question and check the response that best describes how your process operates. **Keep in mind that not all questions will be appropriate for all facilities.** If a question does not apply, check "N/A". For example, if your plant only conducts processing activities, then questions that ask about live animals or slaughter operations would not apply. A "Yes" response for every question is desirable but not expected. A "No" answer on a question does not necessarily mean there is a serious problem with security at your plant. A "No" should trigger some thinking about whether

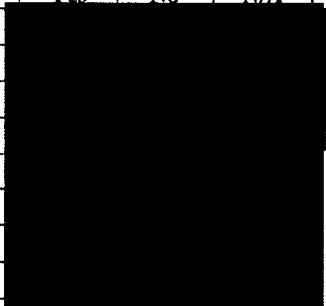
additional security measures are needed. Some questions provide a website address for additional information that might help you formulate your plan.

Outside Security


1. What food defense measures does your plant have in place for the exterior of the building?

	Yes	No	N/A
Is the plant's exterior secured to prevent entry by unauthorized persons (e.g., by locked fence, gate or entry/exit doors)?			
Is there enough lighting outside the building to properly monitor the plant at night/early morning?			
Do emergency exits have self-locking doors and/or alarms?			

2. Are the following secured with locks, seals, or sensors when unattended (after hours/weekends) to prevent entry by unauthorized persons?

	Yes	No	N/A
Outside doors and gates?			
Windows?			
Roof openings?			
Vent openings?			
Trailer (truck) bodies?			
Tanker truck hatches?			
Railcars?			
Bulk storage tanks/Silos?			

3. Does your facility have food defense procedures for people and/or vehicles entering the plant and/or parking in your lot?

	Yes	No	N/A
Does the property have a controlled or guarded entrance?			
Are <u>employee</u> vehicles identified using placards, decals, or some other form of visual identification?			
Are authorized <u>visitor/guest</u> vehicles identified using placards, decals, or some other visual identification?			

General Inside Security

4. Does your facility have food defense measures inside the establishment?

	Yes	No	N/A
Is there an emergency lighting system in the facility?			
Does your plant have monitored security cameras (CCTV)?			
Does your plant have an emergency alert system that is tested regularly?			
Are the locations of controls for emergency alert systems clearly marked?			
Are all restricted areas (i.e., areas where only authorized employees have access) clearly marked?			
Are visitors, guests, and other non-employees (e.g., contractors, salespeople, truck drivers) restricted to non-product areas unless accompanied by an authorized employee?			
Does local law enforcement (including the fire department) have up-to-date copies of facility layouts/blueprints?			
Are procedures in place to check toilets, maintenance closets, personal lockers, and storage areas for suspicious packages?			
Do you regularly take inventory of potentially dangerous tools and utensils (e.g., knives)?			
Do you regularly take inventory of keys to secured/sensitive areas of the facility?			
Are ventilation systems constructed in a manner that provides for immediate isolation of contaminated areas or rooms?			

5. Are the controls for the following systems restricted (e.g., by locked door/gate or limiting access to designated employees) to prevent access by unauthorized persons? (Helpful information is provided at the following website: www.cdc.gov/niosh/bldvent/2002-139.html).

	Yes	No	N/A
Heating, Ventilation, and Air Conditioning systems?			
Propane Gas?			
Water systems?			
Electricity?			
Disinfection systems?			
Clean-in-place (CIP) systems or other centralized chemical systems?			

6. Does your plant collect and analyze samples in-house for microbiological, chemical or physical hazards?



Go to Question 8]

7. Which of the following food defense procedures does your facility have in place for its in-plant laboratory facilities, equipment, and operations?

	Yes	No	N/A
Is access to the in-plant laboratory facility restricted to authorized employees? (e.g., by locked door, pass card, etc.)			
Is a procedure in place to control receipt of samples received from other establishments?			
Is a procedure in place to receive and securely store reagents?			
Is a procedure in place to control and dispose of reagents?			

8. Does your facility use a computer system to monitor processing operations?



[Go to Question 10 under Slaughter and Processing Security]

9. Does your facility have food defense procedures in place for its computer systems?

	Yes	No	N/A
Is the access to the system password-protected? (Helpful information is provided at the following website: http://www.umich.edu/~policies/pw-security.html)			
Are firewalls built into the computer network?			
Is the system using a current virus detection system?			

Slaughter and Processing Security

10. Which of the following food defense procedures does this facility have in place for its slaughter and processing operations?

	Yes	No	N/A
Is access to product production/slaughter and holding pen areas restricted to establishment employees and FSIS inspection personnel only?			
Are lines that handle and transfer products, water, oil, or other ingredients monitored to ensure integrity?			
Are packages of ingredients examined for evidence of tampering before use?			
Is access to in-plant irradiation equipment and materials restricted?			
Are records maintained to allow easy trace-back of raw materials to suppliers?			
Are records maintained so as to allow easy trace-forward of finished products to vendors?			

Storage Security

11. Which of the following food defense procedures does your facility have in place for its storage areas?

	Yes	No	N/A
Is access to raw product storage areas, including cold and dry storage areas restricted (e.g., by locked door/gate or other) to designated employees?			
Is an access log maintained for raw product storage areas?			
Is access to non-meat ingredient storage areas restricted to designated employees only?			
Is an access log maintained for non-meat ingredient storage areas?			
Is access to finished product storage areas restricted to designated employees?			
Is access to external storage facilities restricted to designated employees only?			
Do you conduct regular security inspections of storage facilities (including temporary storage vehicles)?			
Do you maintain records on facility security inspections results?			
Is the inventory of restricted ingredients (i.e., nitrites, etc) checked against the actual use of such ingredients on a regular basis?			
Are product labels and packaging held in a controlled manner to prevent theft and misuse?			
Is the inventory of finished products regularly checked for unexplained additions and withdrawals from existing stock?			

12. Which of the following food defense procedures does your facility have in place for the storage of hazardous materials/chemicals such as pesticides, industrial chemicals, cleaning materials, sanitizers, and disinfectants?

	Yes	No	N/A
Is the access to inside and outside storage areas for hazardous materials/chemicals such as pesticides, industrial chemicals, cleaning materials, sanitizers, and disinfectants restricted in some manner to allow use by designated employees only?			
Is a regular inventory of hazardous materials/chemicals maintained?			
Are discrepancies in daily inventory of hazardous materials/chemicals immediately investigated?			
Are the storage areas for hazardous materials/chemicals constructed and safely vented in accordance with national or local building codes?			
Is a procedure in place to receive and securely store hazardous chemicals?			
Is a procedure in place to control disposition of hazardous chemicals?			

Shipping and Receiving Security

13. Does your facility have food defense procedures in place for its shipping and receiving operations? (Helpful information is provided at the following website:
<http://www.fsis.usda.gov/oa/topics/transportguide.htm>)

	Yes	No	N/A
Are trailers on the premises maintained under lock and/or seal when not being loaded or unloaded?			
Are tanker trucks on the premises maintained under lock and seal when not being loaded or unloaded?			
Is the loading and unloading of vehicles transporting raw materials, finished products, or other materials used in food processing closely monitored?			

14. Does your facility have food defense procedures in place for handling outgoing shipments?

	Yes	No	N/A
Are outgoing shipments sealed with tamper-evident seals?			
Are the seal numbers on outgoing shipments documented on the shipping documents?			
Are tanker trucks and/or rail cars inspected to detect the presence of any material, solid or liquid, in tanks prior to loading liquid products?			
Do you keep records of the above-referenced inspections of tanker trucks and/or rail cars?			
Are chain-of-custody records maintained for tanker trucks and/or rail cars?			

15. Which of the following food defense procedures does your facility have in place for handling incoming shipments?

	Yes	No	N/A
Is access to loading docks controlled to avoid unverified or unauthorized deliveries?			
Is advance notification from suppliers (by phone, e-mail, or fax) required for all incoming deliveries?			
Are suspicious alterations in the shipping documents immediately investigated?			
Are all deliveries checked against the roster of scheduled deliveries?			
Are unscheduled deliveries held outside facility premises pending verification?			
Are off-hour deliveries accepted?			
If off-hour deliveries are accepted, is prior notice of the delivery required?			
If off-hour deliveries are accepted, is the presence of an authorized individual to verify and receive the delivery required?			
Are less-than-truckload (LTL) or partial load shipments vehicles checked?			
Are incoming shipments of raw product, ingredients, and finished products required to be sealed with tamper-evident or numbered seals (and documented in the shipping documents)? Are these seals verified prior to entry?			
Do you check incoming shipments of raw product, ingredients, and finished products at the receiving dock for evidence of tampering?			
Is the FSIS Public Health Veterinarian notified immediately when animals with unusual behavior and/or symptoms are received?			
Are the feed and drinking water supplies for live animals protected from possible intentional contamination?			
Are transportation companies selected with consideration of the company's ability to safeguard the security of product/animals being shipped?			
Do the transportation companies perform background checks on drivers and other employees who have access to product/animals?			
Have your ingredient suppliers taken steps to strengthen food defense in their facilities and during transport?			
When choosing your compressed gas vendor do you consider whether or not they have implemented food defense measures?			
When choosing your packaging materials and labels vendor do you consider whether or not they have implemented food defense measures?			

16. Does this facility allow returned goods, including returns of U.S. exported products, to enter the plant?



GO Question 18 under Water and Ice Security]

17. Which of the following food defense procedures does this facility have in place for returned goods?

	Yes	No	N/A
Arc all returned goods examined at a separate designated location in the plant for evidence of possible tampering before salvage or use in rework?			
Are records maintained of returned goods used in rework?			
Does the plant follow the procedures outlined in FSIS Directive 9010.1 for return of U.S. exported products? (Helpful information is provided at the following website: http://www.fsis.usda.gov/opped/rdad/fsisdirectives/9010-1.pdf)			

Water and Ice Security

18. Which of the following food defense procedures does your facility have in place for its water and ice supply? (Helpful information is provided at the following website:
<http://www.epa.gov/region1/eco/drinkwater/pdfs/drinkingH2Ofactsheet.pdf>)

	Yes	No	N/A
Is access to water wells restricted? (e.g., by locked door/gate or limiting access to designated employees)			
Is access to ice-making equipment restricted?			
Is access to ice storage facilities restricted?			
Is access to storage tanks for potable water restricted?			
Is access to water reuse systems restricted?			
Are <u>potable</u> water lines periodically inspected for possible tampering? (i.e., visual inspection for physical integrity of infrastructure etc.)?			
Are <u>non-potable</u> water lines inspected for possible tampering (i.e., visual inspection for physical integrity of infrastructure, connection to potable lines, etc.)?			
Have arrangements been made with local health officials to ensure immediate notification of the plant if the potability of the public water supply is compromised?			

Mail Handling Security

19. Which of the following food defense procedures does this facility have in place to ensure mail handling security?

	Yes	No	N/A
Is mail handling activity conducted in a separate room or facility away from in-plant food production/processing operations?			
Are mail-handlers trained to recognize and handle suspicious pieces of mail using U.S. Postal Service guidelines? (Helpful information is provided at the following website: http://www.usps.com/news/2001/press/serviceupdates.htm)			

Personnel Security

20. Which of the following food defense procedures does your facility have in place for ensuring that personnel adhere to the security requirements?

	Yes	No	N/A
Are background checks conducted on all employees and contractors (both permanent and seasonal) who will be working in sensitive operations?			
Do all plant employees receive training on security procedures as part of their orientation training?			
Are employees, visitors, and contractors (including construction workers, cleaning crews, and truck drivers) identified in some manner at all times while on the premises?			
Does your plant control access by employees and contractors entering the plant during <u>working</u> hours (e.g. coded doors, receptionist on duty, swipe card, etc.)?			
Does your plant control entry of employees and contractors into the plant during <u>non-working</u> hours (e.g. access limited by key card or code number)?			
Does your plant have a way to restrict temporary employees and contractors (including construction workers, cleaning crews, and truck drivers) to areas of the plant relevant to their work?			
Is there some manner to identify personnel with their specific functions/assignments/departments (e.g., corresponding colored uniforms)?			
Is an updated shift roster (i.e., who is absent, who the replacements are, and when new employees are being integrated into the workforce) kept by management for each shift?			
Does your plant allow personal items within production areas?			
Do you inspect employee lockers?			
Are employees and/or visitors restricted as to what they can bring (cameras, etc.) into the plant?			
Are employees prohibited from removing company-provided clothing or protective gear from the premises?			

Step 2 – Develop a Food Defense Plan

Now that you have identified some areas outside or inside your plant, or procedures used in daily operations that may be more vulnerable than others, you will need to **identify cost-effective preventive actions that can be taken to minimize those vulnerabilities.**

At a minimum, your Food Defense Plan should address:

- ☐ processing security
- ☐ storage security
- ☐ shipping and receiving security
- ☐ water and ice security

Some examples of potential vulnerabilities and food defense measures are listed below. Additional defense measures may be found in trade association guidance material.

Processing Security	
Sample Vulnerabilities	Potential Food Defense Measures
Threat agents introduced at critical points in the process	Restrict access at critical operations to employees that receive additional training and/or background investigations. Increase employee food defense awareness. Monitor process at ballast tanks, grinding/emulsification of meat and poultry products, meat storage coolers, and solution injection. Routinely calibrate equipment such as temperature gauges, pH meters, and scales.
Access from retail shop to critical areas	Monitor customer activity and restrict access to receiving, storage, processing and shipping areas.
In-house analytical laboratory access unsecured	Utilize interior access controls to restrict all but authorized and trained personnel.
Temporary employees with access to critical process areas	Train permanent employees on food defense to raise their food defense awareness. Consider the use of color-coded uniforms, hats, jackets, etc. (e.g. blue uniforms only in raw product area).

Storage Security	
Sample Vulnerabilities	Potential Food Defense Measures
Threat agents placed in non-meat ingredients (spices, additives) and non-food items (disinfectants, cleaners, packaging materials)	Secure access to all points of building entry during non-operating hours. Keep storage areas locked and limit access based on job function. Monitor access to storage areas by issuing keys to only those who should have access. Consider use of logs for inventory material control. Make periodic checks of inventories and examine integrity of packaging.
Threat agents placed in combo bins containing trim, variety meats, or parts destined for further processing	
Cleaning supplies, pest control chemicals and other hazardous material may become agents.	Secure access to all points of building entry during non-operating hours. Control use and storage of hazardous materials by locking in area away from other inventory. Allow access to only those who should have access.

Shipping and Receiving Security	
Sample Vulnerabilities	Potential Food Defense Measures
Unscheduled deliveries	Purchase materials only from recognized vendors. Accept receipt of only scheduled deliveries. Inventory packages against manifest and order forms and examine package integrity. Request that vendors ship materials in tamper-evident packaging.
Products shipped in unsecured trucks, or multiple deliveries per shipment (less-than-truckload)	All truck shipments should be secured by use of tamper-evident seals. Drivers should be trained regarding proper shipping documentation.
Truck drivers on dock with access to plant	Have drivers sign in and escort them at all times while inside the facility.

Water and Ice Security	
Sample Vulnerabilities	Potential Food Defense Measures
Threat agents are put into well water	Lock well house and restrict access.
Threat agents are introduced into ice used in emulsification or other applications.	Secure ice storage facilities.
Threat agents placed in water supply used to prepare marinade	Secure potable water lines and storage tanks.

Using the above information, you are now ready to complete your plan. After completing the following pages you will have successfully developed a Food Defense Plan for your specific operation. Congratulations!

FOOD DEFENSE PLAN

Date of completion of this document: 3/20.2013

Food Defense Plan team members involved in completing this document:
Keaton Walker [REDACTED]

BACKGROUND INFORMATION ON ESTABLISHMENT

Establishment # 45099

Establishment name: Responsible Transportation LLC

Establishment location: 22034 200th Street, Sigourney IA 52591

Contact 1 – Establishment Food Defense Plan

Name: Keaton Walker

Phone number (daytime): 319-461-4580

Phone number (off-hours): 319-461-4580

Contact 2 – Establishment Food Defense Plan

Name: [REDACTED]

Phone number (daytime): [REDACTED]

Phone number (off-hours): [REDACTED]

Primary products produced and shelf lives

Products -- High to Low Volume	Approximate shelf life (days)	Regulatory Authority (FSIS or FDA)

Number of Full and Part-time Employees (check one)

0 – 10 _____ 11 – 100 _____ 101 – 1,000 _____ > 1,000 _____

ADDITIONAL BACKGROUND INFORMATION ON ESTABLISHMENT

Do you have a select supplier program in place? A select supplier program includes such criteria as sampling and testing by a long-term (one year) supplier, auditing to verify their use of critical control points appropriately, documentation that indicates that the supplier has a food defense plan, signed specification agreements, crisis management programs, and stock recovery plans.

No: _____

Yes _____

If yes, approximate % raw material supply covered by select supplier program _____

Primary Raw Materials & Ingredients

Raw material or ingredient ⁽¹⁾	Package type ⁽²⁾	# lbs. finished product/package ⁽³⁾	QA checks on raw material/ingredient ⁽⁴⁾

(1) List your raw materials & ingredients, including water. It may be helpful to begin with major raw materials and ingredients and work toward minor ones; however, note that sometimes minor raw materials or ingredients can impact a large volume of finished products (this is important to understand in developing food defense and is captured in column 3)

(2) Package type should define how the raw material or ingredient is received, e.g., 2,000-pound combo bin, 40-pound frozen block, 50-pound paper sack, 25-pound plastic pail, 5,000-pound bulk liquid

(3) Estimate the number of pounds of finished product that could contain the raw material or ingredient, using one package, e.g., 10,000 pounds raw ground beef from 2,000-pound combo, 500 pounds cooked meat balls from 40-pound frozen block, 25,000 pounds of cooked chicken from 50-pound sack of corn flour

(4) Capture the QA checks done on the raw material and ingredients here, e.g., visual check for package integrity, temperature reading, visual check for extraneous material

ADDITIONAL BACKGROUND INFORMATION ON ESTABLISHMENT

Cleaning and Sanitation Chemicals

Chemical ⁽¹⁾	Package type ⁽²⁾	Storage ⁽³⁾

(1) List your chemicals being as specific as possible.

(2) Package type should define how the chemical is received, e.g., 5,000-gallon bulk liquid, 55-gallon drum; 40-pound liquid pail, 40-pound powder in plastic bag

(3) Provide details on product storage, e.g., locked in cage, unlocked in storage room, locked in bulk-storage tank

Cleaning & Sanitation Staff (check one)

Internal _____ External (contracted) _____ Both internal & external _____

If you use an external company for cleaning & sanitation, how many years have you used this service? _____ How many persons on the crew? _____

Controlling Access to the Establishment & Operations

Question	Yes	No
Do employees undergo background checks?		
Do employees have identification badges for entry?		
Are non-employees always escorted in the establishment?		
Are truck drivers kept out of food storage & preparation areas?		
Are barriers (locked doors, fences) in place to prevent unauthorized entry into the grounds, building and operations areas?		
Are limited-access areas secured?		

ADDITIONAL BACKGROUND INFORMATION ON ESTABLISHMENT

Processing Steps & QA Checks

Step	Yes or No ⁽¹⁾	QA check ⁽²⁾	No QA check
Raw material receiving			
Ingredient receiving			
Raw material storage			
Ingredient storage			
Pre-mixing ingredients			
Mixing, blending, tumbling raw materials & ingredients			
Grinding			
Handling of raw materials by people			
Handling of ingredients by people			
In-process holding, e.g., surge tank, hopper			
Product forming/shaping			
Product injection or tenderizing			
Partial cooking			
Full cooking (CCP)			
Freezing			
Packaging & boxing			
Frozen storage			
Refrigerated storage			

⁽¹⁾ Indicate whether or not your establishment has the processing step in any of your manufacturing processes. Add additional steps as needed.

⁽²⁾ Capture the QA checks done at the specific processing step, if any, e.g., temperature reading, fat analysis, visual check for extraneous material; if no QA check is done, check column 4

ANALYSIS OF BACKGROUND DATA FOR FOOD DEFENSE PLAN

After documenting the background information on employees, access to your facility and operations, raw materials and ingredients, finished products, chemicals and sanitation operations, and processing steps, you are now ready to answer some additional questions in developing your food defense plan.

What are those areas or procedures in your facility and operation that you believe are more vulnerable to possible attack by a terrorist (*i.e.*, critical nodes)?

Area	Reason for vulnerability	Critical Node Yes or No
Employees	Lack of identification	
	Uncontrolled access within plant	
	Unsupervised activities	
Non-employees	Lack of identification	
	Uncontrolled access within plant	
	Unsupervised activities	
Raw materials	Suppliers not part of select supplier program	
	Opportunity for unsupervised access during receiving or storage	
Ingredients	Suppliers not part of select supplier program	
	Opportunity for unsupervised access during receiving or storage	
Processing	Unsupervised access to raw materials during processing	
	Unsupervised access to ingredients during processing	
	Unsupervised access to open hoppers, tanks or other vessels during operations	
Chemicals & Sanitation	Unsupervised crew	
	Unsupervised access to raw materials, ingredients & finished products during cleaning operations	
	Unlocked storage of chemicals	
Other	Access to water supply	

REDUCING RISKS AT CRITICAL NODES FOR THE FOOD DEFENSE PLAN

Now that you have identified some areas outside or inside your establishment, or procedures used in daily operations that are more vulnerable than others, you can think of ways to reduce the risk at that area or processing step. In order to do that, copy those critical nodes identified above into column 2 below and complete the table. You may not have vulnerabilities in all areas listed in the table (add additional rows if needed).

Area	Vulnerability	Possible means to reduce the vulnerability (countermeasures, mitigation strategies) ⁽¹⁾
Employees		
Non-employees		
Raw materials		
Ingredients		
Processing		
Chemicals & Sanitation		
Other		

⁽¹⁾ There currently is no list of countermeasures you may use; although industry task forces have addressed common vulnerabilities; and these may be obtained through trade associations for the meat and poultry industries. It is recommended that a team from the establishment evaluate the vulnerabilities identified and think of the best way in their operation to reduce the risk. This is important because each operation can be unique in terms of its physical design, number and types of employees, hours of operation, raw materials and ingredients used in the operation, et cetera.

FUNCTIONAL FOOD DEFENSE PLAN

The Food Safety and Inspection Service has an expectation that each federally-inspected meat and poultry establishment will have a functional food defense plan. What you have just completed is a simplified vulnerability assessment and the beginning of work to implement countermeasures against those vulnerabilities where such a mitigation strategy is possible.

There are five key characteristics of a functional food defense plan:

Written: You are nearly complete as you answer the following questions and place this completed document in a folder, electronic file or notebook entitled Food Defense Plan.

_____ check here once the plan is written and filed

Implemented: This means you are doing those written procedures in your plan that help reduce the risk or vulnerability (e.g., checking name badges, wearing color-coded hats).

_____ check here if an Implementation Monitoring Schedule exists
(see following pages for example Implementation Monitoring Schedule)

Tested: Testing your plan means that someone challenges (e.g., by moving around the plant without clearance) a component of the written plan to determine whether an employee challenges the activity based on their training and understanding of food defense.

_____ check here if an Test Schedule exists
(see following pages for example Test Schedule)

Assessed: The assessment of the plan may be best accomplished by a third-party (from within or outside the company) expert that can help to determine if the plan is adequate.

_____ check here if a third-party has assessed the plan

Maintained: You need to review the plan at some frequency (e.g., quarterly) to ensure it covers the establishment's activities, signing off on the review to demonstrate the maintenance schedule for the plan.

_____ check here if a Maintenance Schedule exists
(see following pages for example Maintenance Schedule)

FOOD DEFENSE PLAN - IMPLEMENTATION MONITORING SCHEDULE

Date	Identification of Observed Risk-Reduction Procedure ⁽¹⁾	Acceptable (A) Needs Improvement (NI) ⁽²⁾	Sign-off Signature

⁽¹⁾ Write in the activity that is observed, e.g., badge checking, personnel only in designated area, outdoor door secured

⁽²⁾ Acceptable = activity was occurring according to the written plan; Needs Improvement = activity was not occurring according to the written plan – in this case, an action plan should be included to improve the risk-reduction activity (see below)

NEEDS IMPROVEMENT ACTION PLAN - IMPLEMENTATION

Date	Observed Risk-Reduction Procedure Needing Improvement	Needs Improvement Plan ⁽¹⁾	Sign-off Signature

⁽¹⁾ Write in the planned activity to strengthen the risk-reduction activity that was observed to need improvement

FOOD DEFENSE PLAN – TEST/CHALLENGE SCHEDULE

Date	Risk-Reduction Procedure or Method that is Challenged in the Test ⁽¹⁾	Acceptable (A) Needs Improvement (NI) ⁽²⁾	Sign-off Signature

⁽¹⁾ Write in the procedure or method that is challenged, e.g., outside door, personnel in designated area only, secured ingredients or chemicals

⁽²⁾ Acceptable = risk-reduction procedure or method that was physically challenged; Needs Improvement = procedure was not occurring as it should – in this case, an action plan should be included to improve the risk-reduction procedure or method (see below)

NEEDS IMPROVEMENT ACTION PLAN – TEST/CHALLENGE

Date	Challenged Risk-Reduction Procedure Needing Improvement	Needs Improvement Plan ⁽¹⁾	Sign-off Signature

⁽¹⁾ Write in the planned activity to strengthen the risk-reduction activity that was challenged and found to need improvement

FOOD DEFENSE PLAN - MAINTENANCE SCHEDULE

[illegible]

(1) Write in the reason for the review, e.g., quarterly scheduled review, new product lines changing risk profile, FSIS recommendations following audit

Resources contact information in the event that a terrorist activity does occur. Having these resources identified in advance will decrease the reaction time.

Local Law Enforcement:

Keokuk County Sheriff Department, (641) 622-2727
Sigourney Police Department Non Emergency: (641) 622-2345

FBI Office:

Charles (Chris) Gregorski, (202) 324-4294
24-hour operation center, (202) 323-3300

State Health Agency

Iowa Department of Public Health, (515) 281-7689
Keokuk County Public Health, 641-622-3575

USDA Contact:

Randy York (Front Line Supervisor), (515) 491-3052
Meat & Poultry Hotline, (800) 535-4555

FDA Contact:

Chicago Field Office: (630) 769-5520
Headquarters: (301) 294-4030
Office of Emergency Operations: (301) 443-1240

Trade Association Contact:

American Meat Association, (202) 587-4200

**ENVIORNMENTAL QUESTIONNAIRE AND
DISCLOSURE STATEMENT**

EXHIBIT 0



COMMERCIAL APPRAISAL SERVICES
Environmental Questionnaire and Disclosure Statement

Borrower: Responsible Transportation Loan Amount: \$ [REDACTED]
Property Street Address: 22034 200th St
City: Spanaway State: WA Zip Code: 98291
County: Kootenai Cross Street: _____
Contact Name: Keaton Walker
Phone: (360) 461 4580 Email: keaton@responsible-transportation.com

1. Original year/construction of the property: 1977
2. Date of previous rehabilitation: 2001
3. What is the land area: 80.64 Acre
4. Describe the building (number of stories, rooms, square feet, etc): Single Story
34,600 square ft, Masonry Brick walls
5. Current use(s) of the property: Vacant
6. Activities that take place on site: Manufacturing ready to eat meat products
7. Previous use(s) of the property: Cattle Processing Facility
8. Source of building heat: Gas
9. Is there a maintenance area? ☒ YES ☐ NO
10. Are there drains inside the building? ☒ YES ☐ NO
11. Has asbestos survey been performed in building?
~If YES, attach copy of any survey report ☒ YES ☐ NO
12. Is there asbestos in the building?
~If YES, state basis for opinion ☐ YES ☒ NO
13. Have polychlorinated biphenyls (PCB's) been used in electrical transformers, capacitors or other equipment at the property? ☐ YES ☒ NO
14. Have you verified this? ☒ YES ☐ NO
15. Are there or have there been any above ground or underground gasoline, diesel, fuel oil or other chemical storage tanks on the property?
~If YES, attach copies of tank removal reports and closure letters if applicable ☒ YES ☐ NO
16. Number of tanks: 2 Contents: Fuel Oil Tank size: _____
17. Have the tanks been inspected or tested for leakage? ☒ YES ☐ NO
18. Were these tanks removed? ☐ YES ☒ NO
19. Was the piping removed? ☐ YES ☒ NO

Environmental Questionnaire and Disclosure Statement (continued)

- | | | |
|---|--------------------------------------|-------------------------------------|
| 20. Did the site receive closure? | YES | <input checked="" type="radio"/> NO |
| 21. Are other chemicals stored on property in drums/other containers? | <input checked="" type="radio"/> YES | NO |
| 22. Have there been spills, leaks, or any release of chemicals on property?
<i>-Attach copies of any permits or licenses pertaining to the use, storage, handling, release, discharge or disposal of chemicals on the property</i> | YES | <input checked="" type="radio"/> NO |
| 23. Other than bathrooms and kitchens, is wastewater discharged from site? | YES | <input checked="" type="radio"/> NO |
| 24. Is there an oil/grease separator, grease trap, or sump on site? | YES | <input checked="" type="radio"/> NO |
| 25. Are liquid/solid wastes (other than wastewater) generated at the property? | YES | <input checked="" type="radio"/> NO |
| 26. Has the property been used for disposal of any liquid or solid waste? | <input checked="" type="radio"/> YES | NO |
| 27. Has evaporation or storage ponds been located on the property? | <input checked="" type="radio"/> YES | NO |
| 28. Have wastewater treatment facilities been located on the property? | <input checked="" type="radio"/> YES | NO |
| 29. Has there ever been a septic system on site? | YES | <input checked="" type="radio"/> NO |
| 30. Have pesticides, herbicides or other agricultural chemicals been applied to the property? | YES | <input checked="" type="radio"/> NO |
| 31. Have pesticides, herbicides or other agricultural chemicals been mixed, formulated, rinsed or disposed of on the property? | YES | <input checked="" type="radio"/> NO |
| 32. Have environmental investigations or work been performed at the property? | <input checked="" type="radio"/> YES | NO |
| 33. Has the property or a business who has operated (or is operating at the site) been named in any investigation as a potentially responsible party for environmental contamination? | YES | <input checked="" type="radio"/> NO |
| 34. Have there been any past, threatened or pending law suits or administrative proceedings concerning a release or threatened release of any hazardous substance involving the property? | YES | <input checked="" type="radio"/> NO |

I hereby certify, to and for the benefit of the Lender, the information disclosed above is accurate to the best of my knowledge and belief.

x Zeaton Walker x President x 8/31/2012
Signature Title Date

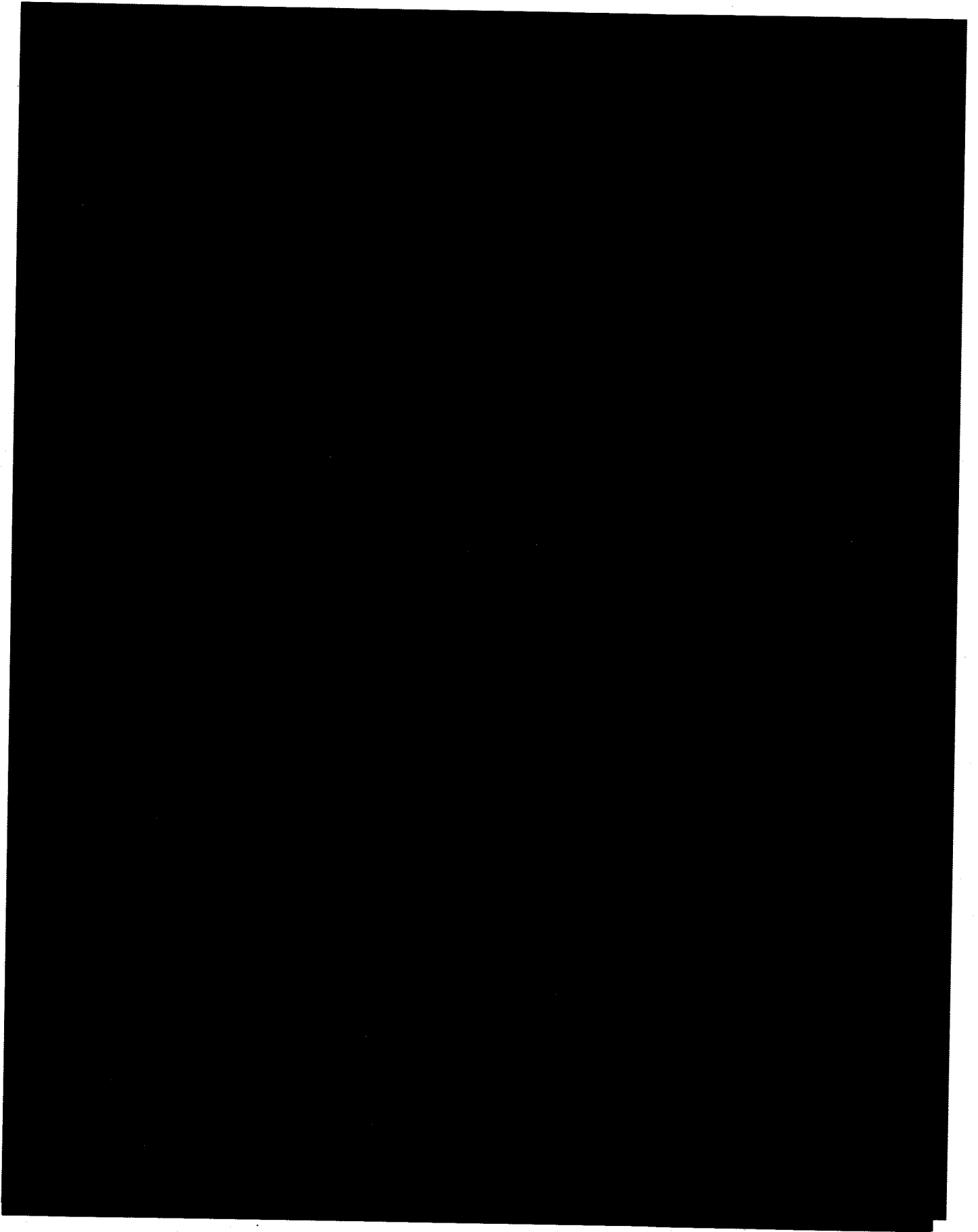
Community 1st Credit Union • www.c1stcreditunion.com • Toll Free (866) 360-5370

This credit union is federally insured by the National Credit Union Administration.

AR0003439

**PROPOSED PHENYLBUTAZONE DRUG
RESIDUE PROGRAM BY RESPONSIBLE
TRANSPORTATION**

EXHIBIT P



DOCUMENTS REQUIRED TO ACCOMPANY
ALL HORSES RECEIVED BY
RESPONSIBLE TRANSPORTATION

1. Written and Visual
Identification form
2. Transient Agent Declaration
3. Medical History
4. Owner Declaration
5. VS Form 10-13A and
VS Form 10-13

EXHIBIT Q



Equine Information Documents

Written and Visual Identification

Version 1.0

Last updated: 4/9/2013

Updated by: Keaton Walker

Location: Responsible Transportation LLC\Permitting\FSIS Grant of Inspection\Equine Information
Documents



Responsible

Transportation

Information Documents Written and Visual Identification

4/9/2013 V1.0

Approved by: _____

A. Written Information

Primary location of the animal _____

(Land location or legal address or Premise Identification Number)

Primary use(s) of the animal. Circle one or more of the following: recreation/companion animal/ pleasure riding, breeding, ranch/farm work, public work, private industry work, performance/sport/show, racing, rodeo, urine production, food production, If other please specify _____

Sex - Mare/Filly, Gelding, Stallion/Colt (Circle one)

Month and year of birth _____ (if known)

Country of Birth _____ (if known)

Height in hands (1 hand = 4 inches) _____

Body Color _____

Markings: Head _____

Body _____

Limbs: Right Front _____

Right Hind _____

Left Front _____

Left Hind _____

The following supplemental identification items may be completed if applicable.

List visible acquired marks (brands, tattoos, scars, etc.) and location

//

Pedigree registry and registration number _____

Microchip number and location _____

Passport ID number _____

Unique Equine Life Number _____

Or other unique identifier _____

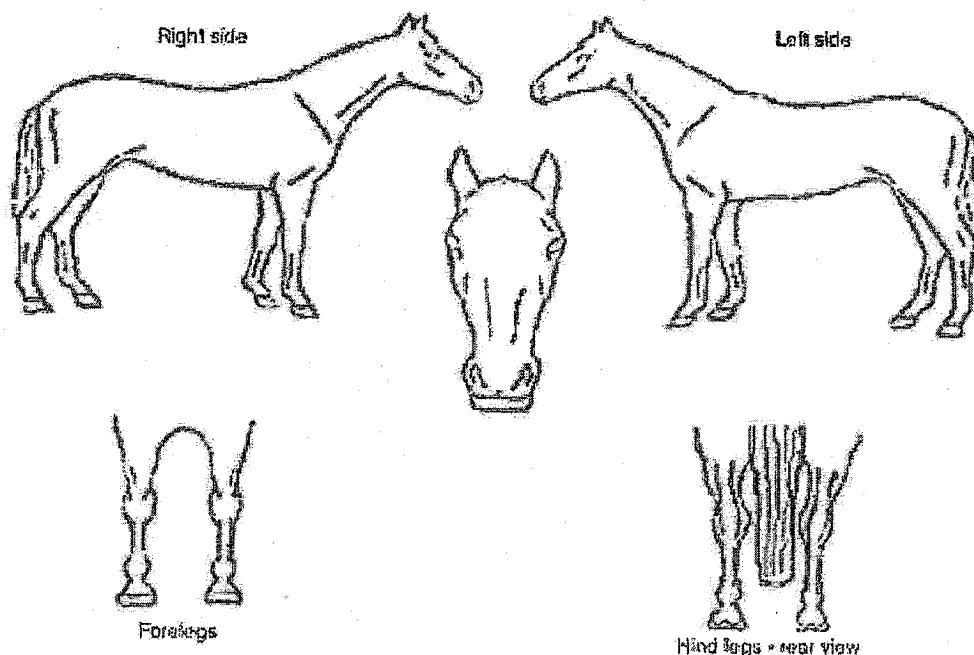
In the case of an Equine Information Document completed by the previous owner, name of previous owner: _____

Location: Responsible Transportation LLC\Permitting\FSIS Grant of Inspection\Equine Information Documents



b) Picture Identification

Attach one or more pages containing color pictures of the animal showing the details contained in each of the views of the silhouettes below. The pictures shall be clear and large enough to see the detail required. If applicable, take close ups of any visible acquired marks such as tattoos and attach. **Owners should ensure that the written description and pictures agree.**



Alternatives to Written and Picture Identification

The following are acceptable alternative means of providing written and/or visual identification information. **Note that the primary location of the animal and the primary use of the animal as indicated in part 1a) Written Identification is also required information.**

1. As a substitute for pictures, the above silhouette is completed, preferably by a licensed Veterinarian or an authorized person ***.Ensure that the written description (part 1a) and the completed silhouette agree.**
* Authorized persons include those authorized under the *Animal Pedigree Act*, those recognized by Equine Canada to issue identification passports, and provincial brand inspectors.
2. Official pedigree registration papers with written description and visual identification. A copy of the registration papers shall be attached to the EID.
3. An official passport. The passport shall be attached to the EID.
4. A complete Equine Information Document (EID) (including part 1) provided by a previous owner(s). The previous complete EID shall be attached to the current EID. The name of the previous owner must appear in part 1a) of the current EID.

Equine Information Documents

Transient Agent Declaration

Version 1.0

Last updated: 4/9/2013

Updated by: Keaton Walker

Approved by: _____

Location: Responsible Transportation LLC\Permitting\FSIS Grant of Inspection\Equine Information Documents

1

AR0003446



Responsible

Transportation

Equine Information Documents Transient Agent Declaration

4/9/2013 V1.0

Transient Agent Declaration(s)

A Transient Agent is a person who maintains responsibility for the care of equine from the time of purchase for slaughter until their arrival at a meat processing establishment in Sigourney, Iowa.

A transient agent declaration is applicable for an animal destined for slaughter shortly (the time needed to assemble, schedule, and move to slaughter) and may not be used in lieu of an ownership declaration. The transient agent declaration may be repeated on the EID as many times as necessary to cover the time period prior to slaughter.

Name of Agent _____

Phone Number (____) ____-____

Address _____

The animal identified on this document has been under my care and control from _____ (date) to _____ (date).
During this time period:

- Has this animal shown signs of any illness or deviation from normal behavior or appearance?
Yes or No. If yes, provide details. _____
- Have any drugs or vaccines been administered to or consumed by the animal? Yes or No. If yes, provide details.

Drug or vaccine	Drug Identification Number (DIN)	Last date of use	Withdrawal period	Amount used (dose) per treatment
-----------------	----------------------------------	------------------	-------------------	----------------------------------

Signature of Agent _____



**Responsible
Transportation**

INTERNAL USE ONLY

Equine Information Documents

Medical History

Version 1.0

Last updated: 4/9/2013

Updated by: Keaton Walker

Approved by: _____

Location: Responsible Transportation LLC\Permitting\FSIS Grant of Inspection\Equine Information Documents

1

AR0003448

Medical History

I, _____ (name of owner) of _____

_____, state your full contact address, [street number or post office box number/city/province or state/postal code or zip code, phone number] am the owner ** of the animal identified on this document and have had uninterrupted possession, care or control of the animal identified below

from _____ (indicate date care or control started)

to _____ (indicate end date).

1. Have any drugs or vaccines been administered to or consumed by the animal during the shorter of the following 2 periods: in the last 180 days, or during the time you owned the animal? Circle Yes or No. If yes, write the name the drug(s) or vaccine(s), Drug Identification Number (DIN) if indicated on the label, last date of use, withdrawal period(s) *** and for drugs, the amount used (dose) per treatment if the label does not indicate a dose or if drug is used at a dosage different than the label indicates.

2. Has the animal identified on this document shown signs of any illness or deviation from normal behavior or appearance during the shortest of the following 2 periods: in the last 180 days, or during the time you owned the animal? Are there any additional items that may impact food safety that should be declared such as broken needles? Circle Yes or No. If yes, provide details.

3. Has the animal identified on this document to your knowledge been treated with a substance listed under the table named substances not permitted for use in food producing equine found in the Meat Hygiene Manual of Procedures, Chapter 17, Annex E, section E.5 during the shortest of the following 2 periods: in the last 180 days, or during the time you owned the animal? Circle Yes or No.

** An owner is a person who owns or has the possession, care or control of an animal.

*** Indicate the withdrawal period (number of days/hours before the animal can be slaughtered) for vaccines and drugs when listed on the product label. For information on withdrawal periods for drugs safe for use in food producing animals but without a withdrawal period for equine listed on the label, please consult the Meat Hygiene Manual of Procedures, Chapter 17, Annex E, section E.6 and section E.7. Alternatively you may contact your veterinarian for assistance to obtain withdrawal information and attach the withdrawal period determination from a recognized veterinary body.

Equine Information Documents

Owner Declaration

Version 1.0

Last updated: 4/9/2013

Updated by: Keaton Walker

Approved by: _____

Location: Responsible Transportation LLC\Permitting\FSiS Grant of Inspection\Equine Information Documents

1

AR0003450

Owner Declaration

As the owner of the animal identified on this document, I hereby certify that the information stated in this Equine Information Document is accurate and complete.

I understand that at least six continuous months of documented acceptable history covering the time period before slaughter is required for an equine presented for processing in an establishment inspected by the Canadian Food Inspection Agency. As such, I have the option of attaching to this document, completed Equine Information Document(s) from previous owner(s) in order to cover the required six continuous months of documented history.

(Signature of owner)

____/____/____
(Date DD/MM/YY)

**OWNER/SHIPPER CERTIFICATE
FITNESS TO TRAVEL TO A SLAUGHTER FACILITY**
(Please type or print in ink)

are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0160. The time required to complete this information collection is estimated to average 5 min. per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

FORM
APPROVED
OMB NO.
0579-0160

HORSES LOADED ON CONVEYANCE		DATE	CITY AND STATE WHERE HORSES WERE LOADED ON CONVEYANCE
VEHICLE LICENSE NO. AND DRIVER'S NAME		NAME OF AUCTION/MARKET	
CONSIGNOR (OWNER/SHIPPER) NAME		CONSIGNEE (RECEIVER/DESTINATION) NAME	
STREET ADDRESS		STREET ADDRESS	
CITY, STATE, ZIP CODE		CITY, STATE, ZIP CODE	
AREA CODE & TELEPHONE NO.		AREA CODE & TELEPHONE NO.	

CHECK THE BOX THAT INDICATES THE FOLLOWING IS TRUE FOR ALL THE HORSES ON THIS CERTIFICATE

- ☐ Pregnant mares are not likely to foal (give birth) during the trip.
 ☐ Horses are able to bear weight on all 4 limbs.
 ☐ Horses are able to walk unassisted.
- ☐ Foals are older than 6 months of age.
 ☐ Horses are not blind in both eyes.

	TAG PREFIX	Tag NO.	COLOR DESCRIPTION						BREED/TYPE					SEX			BRANDS Tattoos, etc.	REMARKS Include existing conditions
			Bay	Grey	Blk.	Pinto	Chestn	Other	TB	QT	Draft	Pony	Other	Mare	Stall	Geld		
1																		
2																		
3																		
4																		
5																		
6																		
7																		
8																		
9																		
10																		
11																		
12																		
13																		
14																		
15																		

HORSES HAVE HAD ACCESS TO FOOD, WATER, AND REST FOR A MINIMUM OF 6 CONSECUTIVE HOURS IMMEDIATELY BEFORE LOADING INTO CONVEYANCE.

SIGNATURE _____

I HEREBY AUTHORIZE THE CFIA TO DISCLOSE THIS DOCUMENT AND THE INFORMATION IN IT AS COMPLETED BY THE CFIA OR DGIF TO THE USDA. FALSIFICATION OF THIS FORM OR KNOWINGLY USING A FALSIFIED FORM IS A CRIMINAL OFFENSE AND MAY RESULT IN A FINE OF NOT MORE THAN \$10,000 OR IMPRISONMENT FOR NOT MORE THAN 5 YEARS OR BOTH (18 U.S.C. SECTION 1001).

SIGNATURE OF OWNER/SHIPPER (I certify that the information contained in this form is true and correct to the best of my knowledge.) _____

CANADIAN FOOD INSPECTION AGENCY (CFIA)

EST. _____

DATE _____

TIME _____

DIRECCION GENERAL DE INSPECCION EN FRONTERAS (DGIF)

EST. _____

DATE _____

TIME _____

**OWNER/SHIPPER CERTIFICATE
FITNESS TO TRAVEL TO A SLAUGHTER FACILITY**
(Please type or print in ink)

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0160. The time required to complete this information collection is estimated to average 5 min. per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

FORM
APPROVED
OMB NO.
0579-0160

HORSES LOADED ON CONVEYANCE	DATE	CITY AND STATE WHERE HORSES WERE LOADED ON CONVEYANCE
VEHICLE LICENSE NO. AND DRIVER'S NAME	NAME OF AUCTION/MARKET	
CONSIGNOR (OWNER/SHIPPER) NAME	CONSIGNEE (RECEIVER/DESTINATION) NAME	
STREET ADDRESS	STREET ADDRESS	
CITY, STATE, ZIP CODE	CITY, STATE, ZIP CODE	
AREA CODE & TELEPHONE NO.	AREA CODE & TELEPHONE NO.	

CHECK THE BOX THAT INDICATES THE FOLLOWING IS TRUE FOR ALL THE HORSES ON THIS CERTIFICATE

- ☐ Pregnant mares are not likely to foal (give birth) during the trip. ☐ Horses are able to bear weight on all 4 limbs.
☐ Foals are older than 6 months of age. ☐ Horses are not blind in both eyes. ☐ Horses are able to walk unassisted.

	TAG PREFIX	Tag NO.	COLOR DESCRIPTION						BREED/TYPE					SEX			BRANDS Tattoos, etc.	REMARKS Include existing conditions
			Bay	Grey	Blk.	Pinto	Chestn	Other	TB	QT	Draft	Pony	Other	Mare	Stal	Geld		
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HORSES HAVE HAD ACCESS TO FOOD, WATER, AND REST FOR A MINIMUM OF 6 CONSECUTIVE HOURS IMMEDIATELY BEFORE LOADING INTO CONVEYANCE.

SIGNATURE

I HEREBY AUTHORIZE THE CFIA TO DISCLOSE THIS DOCUMENT AND THE INFORMATION IN IT AS COMPLETED BY THE CFIA OR DGIF TO THE USDA. FALSIFICATION OF THIS FORM OR KNOWINGLY USING A FALSIFIED FORM IS A CRIMINAL OFFENSE AND MAY RESULT IN A FINE OF NOT MORE THAN \$10,000 OR IMPRISONMENT FOR NOT MORE THAN 5 YEARS OR BOTH (18 U.S.C. SECTION 1001).

SIGNATURE OF OWNER/SHIPPER (I certify that the information contained in this form is true and correct to the best of my knowledge.)

CANADIAN FOOD INSPECTION AGENCY (CFIA)

EST.

DATE

TIME

**DIRECCION GENERAL DE INSPECCION EN
FRONTERAS (DGIF)**

EST.

DATE

TIME

**OWNER/SHIPPER CERTIFICATE
FITNESS TO TRAVEL TO A SLAUGHTER FACILITY
(CONTINUATION SHEET)**
(Please type or print in ink)

displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0160. The time required to complete this information collection is estimated to average 5 min. per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

FORM
APPROVED
OMB NO.
0579-0160

	TAG PREFIX	Tag NO.	COLOR DESCRIPTION						BREED/TYPE					SEX			BRANDS Tattoos, etc.	REMARKS Include precondition
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**OWNER/SHIPPER CERTIFICATE
FITNESS TO TRAVEL TO A SLAUGHTER FACILITY**
(Please type or print in ink)

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FORM
APPROVED
OMB NO.
0579-0160

HORSES LOADED ON CONVEYANCE		DATE	CITY AND STATE WHERE HORSES WERE LOADED ON CONVEYANCE
VEHICLE LICENSE NO. AND DRIVER'S NAME		NAME OF AUCTION/MARKET	
CONSIGNOR (OWNER/SHIPPER) NAME		CONSIGNEE (RECEIVER/DESTINATION) NAME	
STREET ADDRESS		STREET ADDRESS	
CITY, STATE, ZIP CODE		CITY, STATE, ZIP CODE	
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SIGNATURE OF OWNER/SHIPPER (I certify that the information contained in this form is true and correct to the best of my knowledge.)

CANADIAN FOOD INSPECTION AGENCY (CFIA)

EST. _____
DATE _____
TIME _____DIRECCION GENERAL DE INSPECCION EN
FRONTERAS (DGIF)EST. _____
DATE _____
TIME _____

**OWNER/SHIPPER CERTIFICATE
FITNESS TO TRAVEL TO A SLAUGHTER FACILITY
(CONTINUATION SHEET)**
(Please type or print in ink)

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SIGNATURE OF OWNER/SHIPPER(I certify that the information contained in this form is true and correct to the best of my knowledge.)

**TRANSPORTATION WRITTEN HUMANE
HANDLING PROGRAM IN THE
DEVELOPMENTAL STAGES. PROGRAM
BASED UPON EQUINE CANADIAN
PROGRAM**

EXHIBIT R



Responsible
Transportation

INTERNAL USE ONLY

Animal Welfare Guidelines

Version Draft 1

Last updated: 3/27/2013

Updated by:

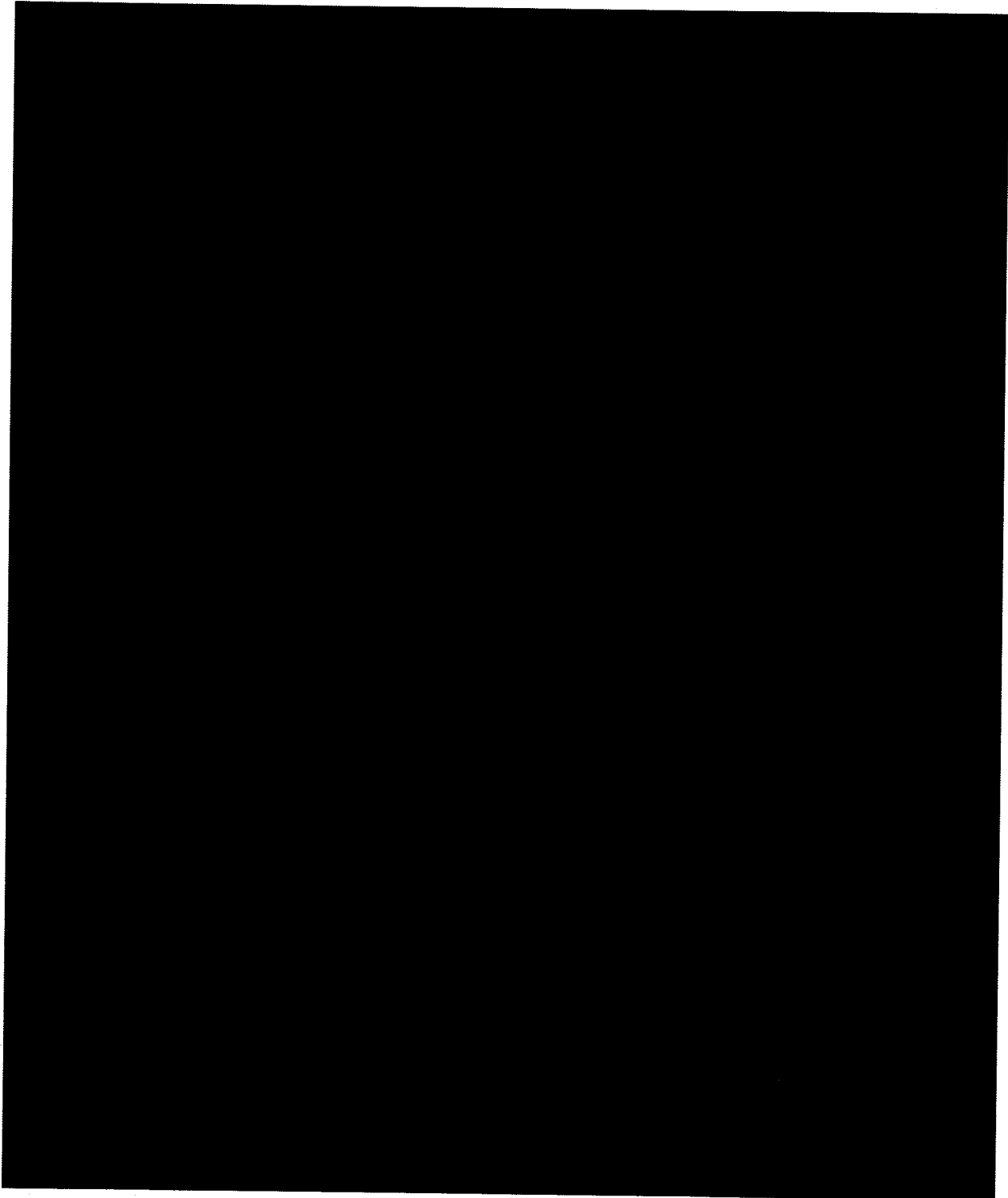
Approved by: _____

Location: /Permitting/FSIS/Pre-Requisites



Responsible Transportation

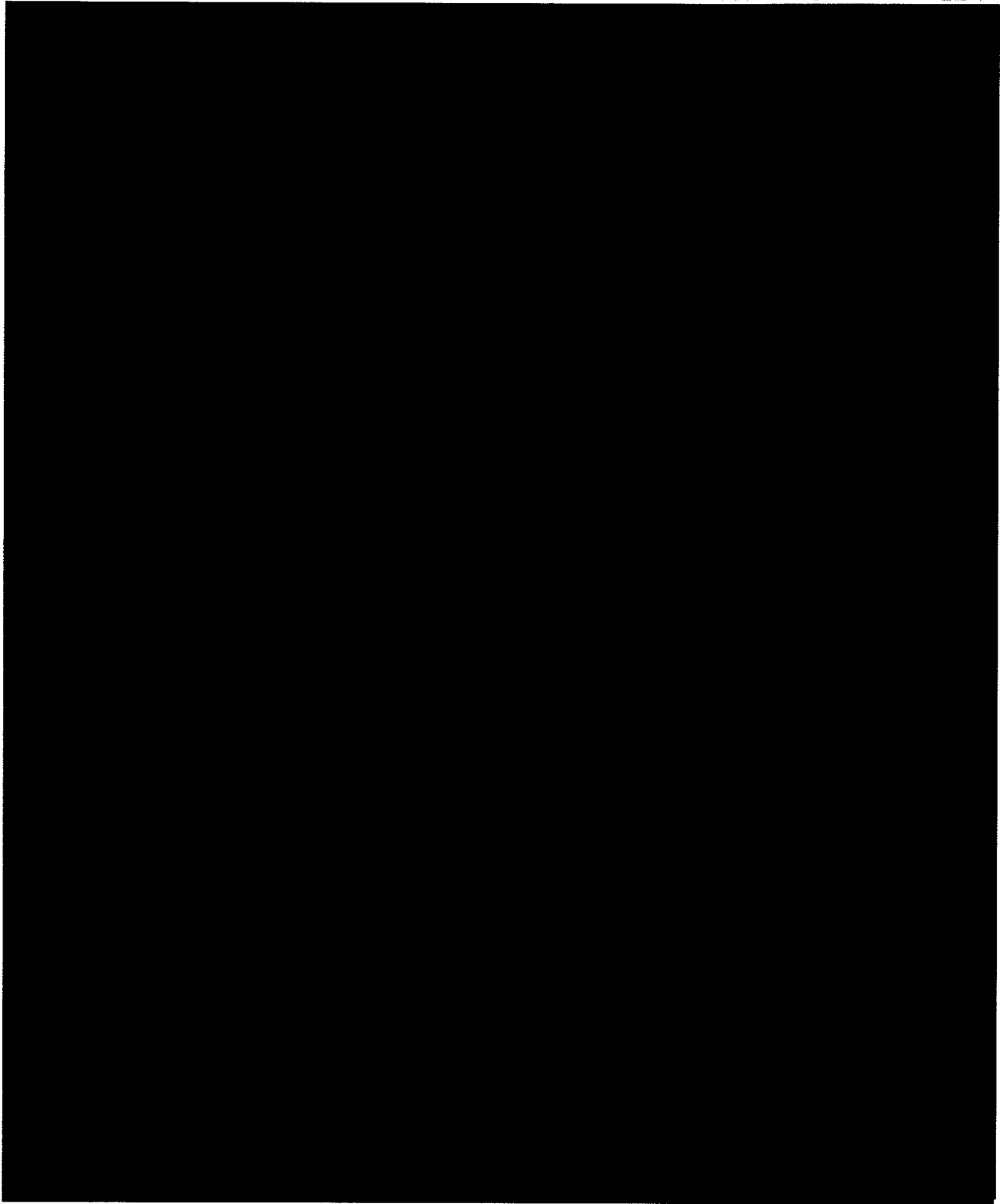
Animal Welfare Guidelines
3/27/2013 V1.0





Responsible Transportation

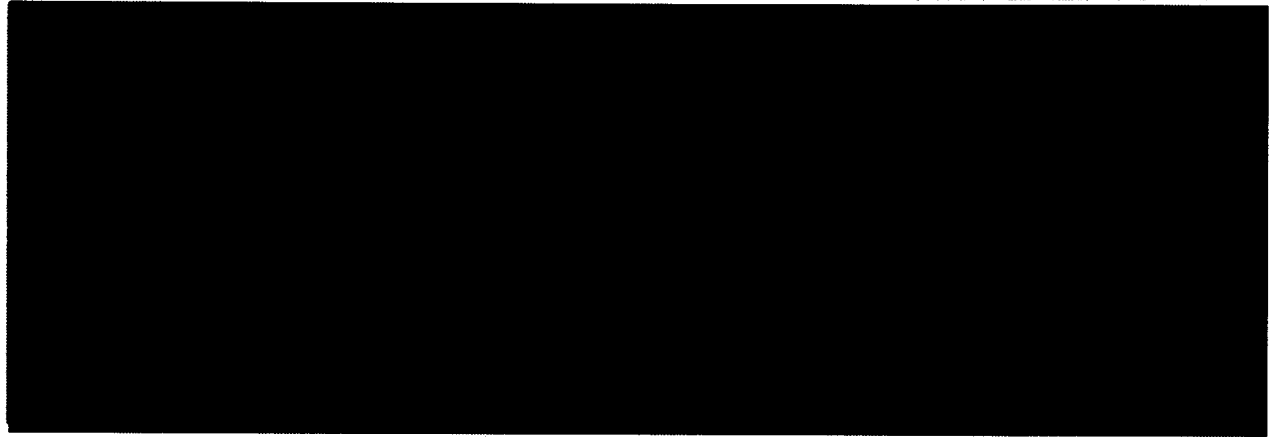
Animal Welfare Guidelines
3/27/2013 V1.0





Responsible Transportation

Animal Welfare Guidelines
3/27/2013 V1.0



Application for Grant of
Inspection from Responsible
Transportation: Including
Associated Correspondences



According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0583-0153. The time required to complete this information collection is estimated to average 10 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE		Instructions: Submit this application to the District/Regional Office, Food Safety and Inspection Service, U.S. Department of Agriculture for import inspection requests. Complete all sections. If a section is not applicable, enter "N/A" or "None." If additional space is needed for any item, attach sheet and number the item.	
APPLICATION FOR FEDERAL INSPECTION (Meat, Poultry, Egg Product, Catfish and Import Inspection)			
SECTION I.		ESTABLISHMENT INFORMATION	
1. Date of Application 12-13-2012	2. Type of Application <input checked="" type="checkbox"/> New <input type="checkbox"/> Change of Ownership <input type="checkbox"/> Change of Location <input type="checkbox"/> Application Extension		
3. Type of Inspection Required (Check box) <input checked="" type="checkbox"/> Meat <input type="checkbox"/> Poultry <input type="checkbox"/> Egg Product <input type="checkbox"/> Import		4. Form of Organization (Check box) <input type="checkbox"/> Individual <input type="checkbox"/> Cooperative Association <input type="checkbox"/> Partnership <input type="checkbox"/> Corporation <input checked="" type="checkbox"/> LLC	
5. If Corporation, Name of State Where Incorporated Iowa	6. Address of Corporate Headquarters 22034 200th Street, Sigourney, IA 52591		7. Date Incorporated 5/21/2010
8. Name of Applicant and Mailing Address (include zip code) Responsible Transportation LLC 22034 200th Street Sigourney, IA 52591	9. Federal Employer ID# [REDACTED]		11. Area Code and Telephone Number (319) 804-9024
	10. Dun & Bradstreet # 962162397		12. Firm's Code (Import Only)
13. Actual Name of and Physical Address of Plant Responsible Transportation LLC 22034 200th Street Sigourney, IA 52591	14. Mailing Address if Different from Item 8 (include zip code) <i>same</i>		15. Area Code and Telephone Number (319) 804-9024
16. Attach Limits or Establishment Premises to be under Federal Inspection (for egg plants attach blueprint) Please find facility layout drawing attached			
17. Name and Establishment Number of other official establishments located in the same facility <i>None</i>		18. Doing Business As <i>None</i>	
19. Month and Year when establishment will be ready to operate under inspection March 2013		20. Comments Currently renovating facility	

- c. ☒ Raw - Not Ground (Intact Products)
- d. ☐ Thermally Processed Commercially Sterile
- e. ☐ Not Heat Treated - Shelf Stable
- f. ☐ Heat Treated - Shelf Stable
- g. ☐ Fully Cooked - Not Shelf Stable
- h. ☐ Heat Treated but Not Fully Cooked - Not Shelf Stable
- i. ☐ Product with Secondary Inhibitors - Not Shelf Stable

EGG PRODUCTS INSPECTION

N/A

21 B. Check the type of product intended for inspection at the establishment (Check all that apply)

- a. ☐ Shell Egg Breaking
- b. ☐ Thermally Processed (Pasteurized heat treated)
 - ☐ Cans/Pails ☐ Flexible Pouches ☐ Jars ☐ Cartons ☐ Bag-in-Box ☐ Totes ☐ Tankers ☐ Other
- c. ☐ Not Heat Treated - Unpasteurized egg product only
- d. ☐ Heat Treated - Shelf Stable (Dried egg product, 50% Sugar Yolk)
- e. ☐ Heat Treated But Not Fully Cooked - not shelf stable (liquid and frozen egg products)

IMPORT INSPECTION

N/A

21 C. Species (Check all that apply)

- ☐ Meat ☐ Poultry ☐ Egg Products ☐ Catfish

22. Check the type of product intended for inspection at the establishment (Check all that apply)

- a. ☐ Raw - Non-Intact
 - ☐ Ground ☐ Other Non-Intact
- b. ☐ Raw - Intact
 - Carcasses: ☐ Beef ☐ Veal ☐ Veal Hide On ☐ Goats ☐ Pork ☐ Lamb
 - ☐ Mutton ☐ Equine ☐ Poultry ☐ Retites
 - Other: ☐ Cuts ☐ Boneless Manufacturing Meats ☐ Other Intact
- c. ☐ Thermally Processed Commercially Sterile
 - ☐ Cans ☐ Flexible Pouches ☐ Trays ☐ Jars
- d. ☐ Not Heat Treated - Shelf Stable

f. ☐ Heat Treated But Not Fully Cooked - Not Shelf Stable

h. ☐ Product with Secondary inhibitors - Not Shelf Stable

i. ☐ Shelf Eggs/Egg Products


- ☐ Shell Eggs ☐ Liquid ☐ Frozen ☐ Dried

23. Mode of Transportation - Import Inspection Only (Check all that apply)

- ☐ Tankers ☐ Rail Cars ☐ Trucks ☐ Ocean Vessel ☐ Airline ☐ Other (Specify) _____

SECTION III OWNERSHIP AND MANAGEMENT INFORMATION

24. List all persons responsibly connected with the applicant. Include all owners, partners, officers, directors, holders or owners of 10 per centum or more of voting stock and employees in a managerial or executive capacity in the business. Notify the Division Director or Import Inspection Division Director of any changes in the listing given.

Name and Title (Title - Indicate if partner or manager)	Present Home Address (Street and Number, City, State, Zip Code)	HOLDER OF 10% OR MORE VOTING STOCK (If Corp.)	
Keaton Walker - President & CEO		YES	NO
Chase Greiner - CFO		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Travis Bouslog - Secretary		<input type="checkbox"/>	<input checked="" type="checkbox"/>
		<input type="checkbox"/>	<input checked="" type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>

25. Enter the name of each person listed under item 24 who has been convicted in any Federal or State court of any felony. Enter the name of each person listed under item 24 who has been convicted in any Federal or State court of more than one violation of any law, other than a felony, based upon the acquiring, handling, or distributing of unwholesome, mislabeled, or deceptively packaged food or upon fraud in connection with transactions in food. Include the nature of the crime, the date of conviction and the court in which convicted. If none write "None."

None

26. List each conviction against the applicant (person, firm or corporation) in any Federal or State court of any felony. List each conviction against the applicant (person, firm or corporation) in any Federal or State court of more than one violation of any law, other than a felony, based upon the acquiring, handling, or distributing of unwholesome, mislabeled, or deceptively packaged food or upon fraud in connection with transactions in food. Include the nature of the crime, the date of conviction and the court in which convicted. If none write "None."

None

27. Sanitation Standard Operating Procedures have been developed for the establishment in accordance with §416.12 of the regulations. (Check one)

☒ YES ☐ NO

28. Applicant has been provided with a copy of this Privacy Act Notice. (Check one)

☒ YES ☐ NO

29. Typed Name of Person Signing Application
Keaton Walker

30. Signature



31. Title

President & CEO

TO BE COMPLETED BY USDA-FSIS

rec'd 12-17-12



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Office of Field
Operations

Des Moines
District
Office

Neal Smith Federal Building
210 Walnut Street
Room 985
Des Moines, IA 50309-2123
515-727-8960
Fax: 515-727-8991

December 26, 2012

Keaton Walker
President & CEO
Responsible Transportation LLC
22034 200th Street
Sigourney, IA 52591

Dear Mr. Walker:

Establishment number 45099 (EST 45099) has been reserved for your federal operations located at the above address. Your facility is not entitled to use this number until it receives a Conditional Grant of Inspection.

Please be advised that processing cannot start until horse slaughter is initiated in the United States or a foreign system is deemed equivalent. Horse meat cannot enter the United States for human consumption, including processing of the meat, until the slaughter issues are resolved.

Please continue to work with Frontline Supervisor Dr. [REDACTED] to make sure your establishment meets Federal requirements, and the Hazard Analysis and Critical Control Point

[REDACTED]

If you need further assistance, do not hesitate to contact [REDACTED] or this office.

Sincerely,

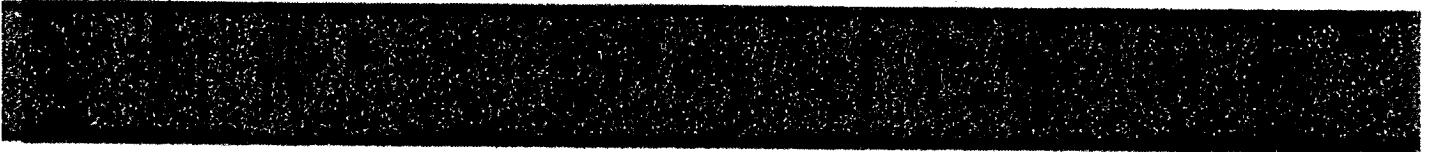
Dawn Sprouls, D.V.M.
District Manager

cc:

[REDACTED] FLS

Financial Processing Center, Des Moines, IA
DMDO Management Team

FSIS:OFO:DMDO:DSprouls:ew:515-727-8960:12-26-12





United States
Department of
Agriculture

Food Safety
and Inspection
Service

Office of Field
Operations


Des Moines
District
Office

Neal Smith Federal building
210 Walnut Street
Room 985

Des Moines, IA 50309-2123
515-727-8960
Fax: 515-727-8991

TO: [REDACTED] FLS

December 26, 2012

FROM: 
Ellen Wade
Management Analyst

SUBJECT: Est. 45099, Responsible Transportation LLC, Sigourney, IA

Please be advised that Est. 45099 cannot begin its operations until a Conditional Grant of Inspection is issued. FSIS Form 5200-4, and the enclosed worksheet, need to be faxed, mailed, or emailed to the district office. Copies are enclosed for your use.

Please forward the enclosed worksheet to the IIC (or designated individual) to complete at some point before or during the walk-through. Please also indicate if the establishment is *Large*, *Small*, or *Very Small*.

Should you have any questions, please contact me.

Enclosures

cc:





United States
Department of
Agriculture

Food Safety
and Inspection
Service

Office of Field
Operations

Des Moines
District
Office

Neal Smith Federal Building
210 Walnut St., Room 985
Des Moines, IA 50309-2133

515-727-8960
Fax: 515-727-8991

March 28, 2013

Keaton Walker
Responsible Transportation LLC
22034 200th Street
Sigourney, IA 52591

Dear Mr. Walker:

This office received your company's new Application for Federal Inspection on December 4, 2012. In accordance with FSIS Directive 5220.1, Revision 1, dated January 30, 2013, your company's application was scanned and emailed to the Office of Program Evaluation, Enforcement, and Review (OPEER). They will conduct a compliance background inquiry and notify this office whether or not it can move forward with processing your application.

If you have any questions regarding this, please contact this office. Thank you.

Sincerely,

cc:

FLS
RMS Staff

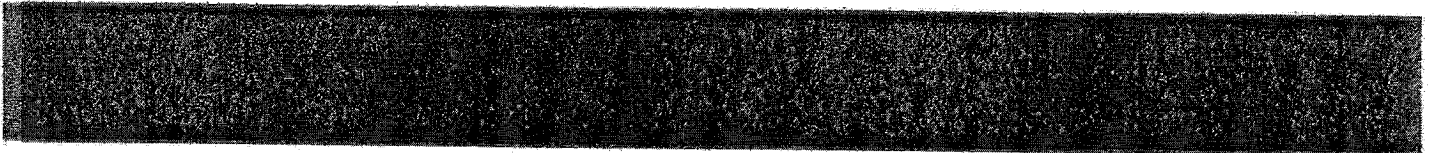
FSIS:OFO:DMDO:DSprouls:ew:515-727-8960:3-28-13

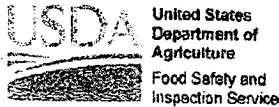
MOI Documenting EIAO Visit to
Responsible Transportation and
Review of:

SPS

SSOP

HACCP





Field
Operations

Des Moines District
Neal Smith Federal Building
210 Walnut, Room 985
Des Moines, IA 50309-2133

Date: March 28, 2013

RE: Review at Responsible Transportation LLC

Reviewers: EIAOs [REDACTED] & [REDACTED]

Documents included for Review: HACCP plans (Slaughter and Processing) and SSOPs

Disclaimer: Only the written plan that was submitted was reviewed (no supporting documentation, decision-making documents, or documents supporting the monitoring and verification procedures were reviewed). The documents reviewed were reviewed from the perspective of meeting current regulatory requirements and comments should be viewed in that light. Since these plans have not been implemented yet, it is up to the establishment to ensure that regulatory requirements are met once it is implemented.

Comments from Review

The establishment is responsible for ensuring that the HACCP plans are implemented and maintained.

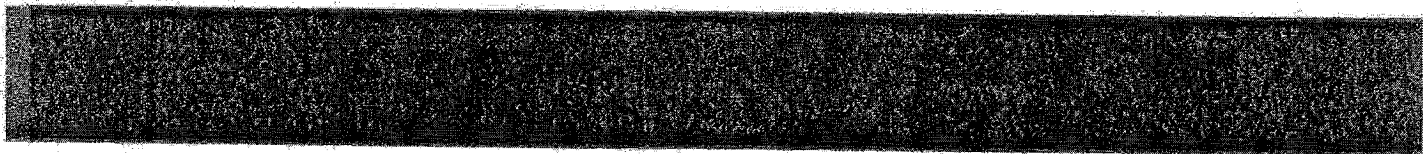
Chase Greiner, Keaton Walker, and Travis Bouslog. There were various items discussed including:

1. Slaughter HACCP plan hazards identified. Physical hazards included string and the plastic bags used in bunging. The definition of a physical hazard was shared with the FDA resource referred to as a possible guide for their use. Pathogens identified were *Salmonella* and *E coli* O157:H7. Discussed was how they had selected those as biological hazards and the support expected for the CCPs

3. The SSOPs were reviewed. The monitoring for operational sanitation had an ambiguous frequency statement so it was suggested this be clarified. The preoperational monitoring was described as being performed after sanitizing and it was described how application of the sanitizer would be better after the inspection of equipment instead of prior. Earlier we had discussed the sanitation requirements related to breaking production in case of a need to retain or hold product. They were informed that we would not consider less than a complete clean up adequate.

We did a walk through of the facility with most areas found to have active construction going on. FLS [REDACTED] did state they had made significant progress since his last visit. We ended with a short discussion of the final review process needed for the food safety plans and the facility.

MOI Documenting DVMS Visit to
Responsible Transportation and
his review of the Humane
Handling Program



Memorandum of Interview

Report of Site Visit: Responsible Transportation, Sigourney, IA
Date: 4/5/2013

Purpose: Facility Pre-Evaluation Related to Humane Handling for Slaughter

Participants: Dr. [REDACTED] FSIS, Front Line Supervisor
Dr. [REDACTED] FSIS, District Veterinary Medical Specialist
Mr. Keaton Walker, President/CEO, Responsible Transportation
Mr. Chase Greiner, CFO, Responsible Transportation
Mr. Travis Bouslog, COO, Responsible Transportation

Results:

[REDACTED] and Dr. [REDACTED] read and reviewed the written animal welfare program presented by the management of Responsible Transportation. The program was based on the Canadian Food Inspection Agency's, "Horse Transport and Slaughter/Handling Requirements." Much of the document described the shipping, receiving, and examination of transport vehicles. Dr. [REDACTED] and [REDACTED] both discussed the requirements for humane handling in the FSIS regulations and referred the management representatives to the appropriate references, 9 CFR 313 and FSIS Directive 6900.2 revision 2. The development of a systematic approach to humane handling of animals for slaughter was also discussed and included the four requirements described in the Federal Register Notice of September 9, 2004, concerning the systematic approach. Dr. [REDACTED] also provided a general overview of the regulatory requirements contained in 9 CFR 313 for the management of Responsible Transportation.

At the request of the managers Dr. [REDACTED] walked through the animal handling facilities in the plant. These facilities were currently under construction and fabrication. The management members informed Dr. [REDACTED] that the dimensions and design of the pens and drive alleys were

[REDACTED]

humane handling requirements.

As a follow-up to the review Dr. [REDACTED] provided electronic copies of FSIS Directive 6900.2 revision 2, Firearms and Captive Bolt Stunner Placement reference documents, FSIS Directive 6100.1, and the AMI Guidelines for Animal Welfare to the management of Responsible Transportation.

Masood, Khalid - FSIS

From: [REDACTED] FSIS
Sent: Monday, July 01, 2013 10:18 PM
To: Sorouls, Dawn - FSIS; Masood, Khalid - FSIS; Turner, Rosemary - FSIS; Gerwig, Todd - FSIS
Cc: [REDACTED] FSIS; [REDACTED] FSIS; [REDACTED] FSIS; Wade, Ellen - FSIS; [REDACTED] FSIS
Subject: Recommendation Conditional Grant Be Issue Est. 49055; Responsible Transportation
Importance: High

Good Evening All,

Attached please find the file I have put together recommending a conditional grant be issue Est. 45099, Responsible Transportation, Sigourney, IA. Should you have any suggestions, corrections, or need any further information, please do not hesitate to contact me and I will be happy to incorporate them into the file. Thanks to FLS [REDACTED] EIAO [REDACTED] and DVMS [REDACTED] for their expertise and time in completing this walk through and file today. All their efforts and hard work are really appreciated. Tanks! [REDACTED]



Est 45099
onditional Grant Re.

DVM

Frontline Supervisor, Iowa City Circuit
Des Moines District
USDA/FSIS/FO
2430 Sunflower Ridge
Muscatine, IA 52761
Blackberry 515-[REDACTED]
email [REDACTED]k@fsis.usda.gov

OFO---"Verifying Food Safety and Animal Welfare Every Day"

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U. S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE

HOURS OF OPERATION REQUEST/APPROVAL

1. NAME OF APPLICANT <i>Responsible Transportation</i>	2. DATE OF REQUEST <i>1 July 2013</i>	3. DISTRICT / IID-HEADQUARTER OFFICE <i>Des Moines</i>
4. MAILING ADDRESS OF APPLICANT <i>22034 200th St. Sigourney, IA 52591</i>		<input checked="" type="checkbox"/> New (Attach to application form) <input type="checkbox"/> Update or Revision

HOURS OF OFFICIAL INSPECTION OPERATIONS REQUESTED - SHIFT 1

DAY OF WEEK	SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
Start Time		7:00	7:00	7:00	7:00	7:00	
Lunch Break Start		10:00	11:00	11:00	11:00	11:00	
Lunch Break End		11:30	11:30	11:30	11:30	11:30	
End Time		3:30	3:30	3:30	3:30	3:30	

HOURS OF OFFICIAL INSPECTION OPERATIONS REQUESTED - SHIFT 2

DAY OF WEEK	SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
Start Time							
Lunch Break Start							
Lunch Break End							
End Time							

5. SIGNATURE OF APPLICANT <i>[Signature]</i>	6. PRINTED NAME <i>Kenton Walker</i>
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HOURS OF OFFICIAL INSPECTION OPERATIONS GRANTED - SHIFT 1

DAY OF WEEK	SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
Start Time							
Lunch Break Start		Above hours of official inspection operations requested are granted.					
Lunch Break End							
End Time							

HOURS OF OFFICIAL INSPECTION OPERATIONS GRANTED - SHIFT 2

DAY OF WEEK	SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
Start Time							
Lunch Break Start							
Lunch Break End							
End Time							

7. PRINT NAME OF DISTRICT / IID - HEADQUARTER MANAGER <i>Dawn Spradick D.V.M., Dist. Mgr.</i>	8. SIGNATURE OF DISTRICT / IID-HEADQUARTER MANAGER <i>[Signature]</i>	9. DATE <i>07/02/2013</i>
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FSIS FORM 5200-15 (4/19/2012)

8. Facility Supervisor:



Current:
2505

Date:
1 July 2013

DIST: 7/2/13
cc: Plant Owner/Operator
IIC, Est. 45099 FLS, Cir. 25-05
RMS Staff DMDO File

AR0003477



United States
Department of
Agriculture

Food Safety
and Inspection
Service

Field
Operations

Des Moines District
Federal Bldg., Room 985
210 Walnut Street
Des Moines, IA 50309

March 28, 2013

To: Dr. Dawn Sprouls, District Manager
Des Moines District
Federal Building; Room 985
210 Walnut
Des Moines, Iowa 50309

From: [REDACTED] FLS 2505
Iowa City Circuit
Des Moines District

RE: Update on Responsible Transportation, Sigourney, Iowa

On Thursday, March 28, 2013, I made my second visit to Sigourney, Iowa, to meet with Mr. Keaton Walker and Mr. Chase Greiner who have applied for a federal grant for equine slaughter under the business, Responsible Transportation. Accompanying me today were EIAO's [REDACTED] and [REDACTED] Ms. [REDACTED] and Ms. [REDACTED] reviewed the written programs presented by Mr. Walker and Mr. Greiner, which they propose to implement and validate when a conditional grant is awarded and when they are able to begin operations. After reviewing the programs and discussing some issues all parties proceeded on a tour of the facilities (memo describing EIAO findings attached).

The tour revealed significant progress since my visit two weeks ago. The day of the tour refrigeration contractors were installing the cooling units. Review of the unloading docks and holding pens showed the knock box to be installed. the drive alleys and holding pens are nearing

[REDACTED]

Since my visit two weeks ago.

My next visit is scheduled for Friday, April 5th. Dr. [REDACTED], Des Moines DVMS, is planning to accompany me on this visit to review the written Humane Handling program (patterned after Canadian programs) Responsible Transportation proposes to implement at the onset of operations. Should you have any questions or require any further information, please do not hesitate to contact me. Thank you.

[REDACTED] FSIS

From: [REDACTED] - FSIS
Sent: Monday, April 08, 2013 8:55 AM
To: Turner, Rosemary - FSIS
Cc: [REDACTED] FSIS; Sprouls, Dawn - FSIS
Subject: Sigourney Operations

Good Morning Dr. Turner,

Dr. [REDACTED] and I visited Responsible Transportation on Friday, April 5, 2013. At that time we reviewed the written humane handling program plant management has developed and intends to implement when operations begin. This program is based upon Canadian Equine Humane Handling requirements and is the form of a written program, self assessment daily audit, and a quarterly plant management or designee audit. Dr. [REDACTED] had several comments and discussions with plant management regarding their program. He advised me he will be providing you a separate report on his aspect of today's visit.

Construction continues daily at the facility. Work in the carcass cooler area and cut floor continues and appears to be nearing completion. The work on the (un)loading dock area, holding pens, and drive alley leading to the knock box is nearing completion as well. This week distraction prevention panels have been installed on the drive alley. The holding pens are equipped with [REDACTED] and the corrals appear complete. Plant management is now assessing the lighting in the area from both the perspective of providing ample light on cloudy and overcast days, as well as implementing ideas for lighting to decrease balking in the drive alleys. Gates are already installed in the drive alleys to prevent backing up and the issues that would create. New waffling of the floor to prevent slips and falls has been completed in the holding corrals as well as the unloading dock and all drive alleys. The grooves appear sufficiently deep to aid in footing of the animals. The knock box is completely installed and ready to operate.

At this time there is no equipment installed on the kill floor itself. According to plant management the delay is caused by failure to have received the floor mounted rail system which will need to be one of the first things installed on the slaughter floor. However, much if not most of the equipment, platforms, saws, etc. has been received and is being stored at the facility. Management anticipates construction on the kill floor to proceed rather swiftly once the rails are installed. The line will be a [REDACTED] line.

Discussions with [REDACTED] and [REDACTED] regarding the [REDACTED] line.

Information, please do not hesitate to contact me. Thanks. [REDACTED]

[REDACTED] DVM
Frontline Supervisor
Iowa City Circuit
Des Moines District
BB 515 [REDACTED]



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Field
Operations

Des Moines District
Federal Bldg., Room 985
210 Walnut Street
Des Moines, IA 50309

April 7, 2013

To: Dr. Dawn Sprouls, District Manager
Des Moines District
Federal Building, Room 985
210 Walnut
Des Moines, Iowa 50309

From: [REDACTED] FLS 2505
Iowa City Circuit
Des Moines District

RE: Update on Responsible Transportation, Sigourney, Iowa

On Friday, April 5, 2013, I made my third visit to Sigourney, Iowa, to meet with Mr. Keaton Walker, Mr. Chase Greiner and Mr. Travis Bouslog, officers of Responsible Transportation, who have applied for a federal grant for equine slaughter. Accompanying me today was Dr. [REDACTED], Des Moines District DVMS. Dr. [REDACTED] performed a thorough review of the written program presented by Responsible Transportation, which they propose to implement and validate as their written humane handling program when a conditional grant is awarded and when they begin operations. Dr. [REDACTED] indicated he would be providing Dr. Sprouls his own separate report. After reviewing the programs and discussing some issues all parties proceeded on a tour of the facilities.

The tour revealed significant progress since my visit last week. Refrigeration contractors continue work in the areas designated for carcass chilling. Review of the unloading docks and holding pens

[REDACTED]

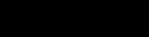
and the contractors were working in multiple areas throughout the facility.

Mr. Walker indicated they are still planning on having construction completed and to be ready to begin operations as of May 1, 2013. I pointed out to Mr. Walker, they will have to have a conditional grant awarded their business prior to commencing operations. He acknowledged he was aware of this.

My next visit is scheduled for Thursday, April 11, 2013, to review progress at that time. Should you have any questions or require any further information, please do not hesitate to contact me. Thank you.

My next visit is scheduled for the end of the week of April 14, 2013, to review progress at that time. Should you have any questions or require any further information, please do not hesitate to contact me. Thank you.

Respectfully submitted,

 DVM

FLS Circuit 2505





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Field
Operations

Des Moines District
Federal Bldg., Room 985
210 Walnut Street
Des Moines, IA 50309

April 15, 2013

To: Dr. Dawn Sprouls, District Manager
Des Moines District
Federal Building; Room 985
210 Walnut
Des Moines, Iowa 50309

From: [REDACTED] FLS 2505
Iowa City Circuit
Des Moines District

RE: Update on Responsible Transportation, Sigourney, Iowa

On Thursday, April 11, 2013, I made my fourth visit to Sigourney, Iowa, to meet with Mr. Keaton Walker and Mr. Chase Greiner, officers of Responsible Transportation, who have applied for a federal grant for equine slaughter at a facility they are renovating in Sigourney, Iowa. After reviewing their program revisions and discussing some issues all parties proceeded on a tour of the facilities. [REDACTED]

[REDACTED] Further information this process will be gathered at the next weekly meeting. [REDACTED]

The tour revealed significant progress in construction. Refrigeration contractors were continuing to [REDACTED]

[REDACTED] rails have been received and installed. There was significant prefabrication of the kill floor in preparation for receipt and installation of the floor mounted rails.

Mr. Walker indicated they are still planning on having construction completed by the first week in May. They hope to be ready to begin operations as of May 13, 2013. I pointed out to Mr. Walker; they will have to have a conditional grant awarded their business prior to commencing operations. He acknowledged this is something he is aware of.



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Des Moines District
Federal Bldg., Room 985
210 Walnut Street
Des Moines, IA 50309

April 22, 2013

To: Dr. Dawn Sprouls, District Manager
Des Moines District
Federal Building; Room 985
210 Walnut
Des Moines, Iowa 50309

From: [REDACTED] FLS 2505
Iowa City Circuit
Des Moines District

RE: Update on Responsible Transportation, Sigourney, Iowa

On Friday, April 19, 2013, I made my fifth visit to Sigourney, Iowa, to meet with Mr. Keaton Walker, Mr. Chase Greiner and Mr. Travis Bouslog, officers of Responsible Transportation, who have applied for a federal grant for equine slaughter. The majority of today's visit was designed to obtain information necessary to complete a report in response to [REDACTED]

[REDACTED] It was decided they will review the list discussed and develop a file of answers with supporting documentation which I will review with Mr. Walker, Mr. Greiner and Mr. Bouslog on Tuesday, April 23, 2013, at [REDACTED]

many completed all work in the areas designated for enclosed chilling. Most of the unloading docks and holding pens showed the drive alleys and holding pens are essentially completed with distraction shields, waffled cement floors, and additional lighting installed. The floor mounted rails to be installed on the slaughter floor have yet to arrive, but are scheduled to arrive early next week. Other equipment to be installed on the kill floor has arrived and will be installed after the rails have been received and installed. There is no equipment as yet installed on the kill floor at this time. It was noted several different continue to work in multiple areas throughout the facility.

Mr. Walker indicated the board is planning on having construction completed and to be ready to begin operations as of May 13, 2013. I pointed out to Mr. Walker; they will have to have a conditional

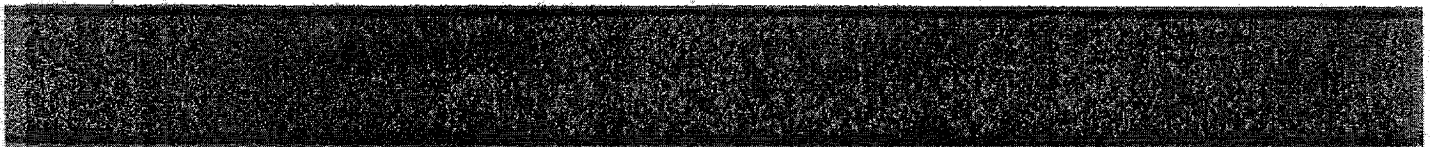
Grant awarded their business prior to commencing operations. He acknowledged he was aware of this. A final walk through has been tentatively scheduled for May 7, 2013.

My next visit is scheduled for Tuesday, April 23, 2013, to meet with the area State Department of Agriculture Veterinarians and gather answers to questions posed today as well as supporting documentation. Should you have any questions or require any further information, please do not hesitate to contact me. Thank you.

Respectfully submitted.



MOI's Documenting FLS visits to
Establishment documenting
progress of construction and
areas of discussion



U.S. DEPARTMENT OF AGRICULTURE FOOD SAFETY AND INSPECTION SERVICE RECOMMENDATION ON APPLICATION FOR INSPECTION	1. ESTABLISHMENT NO. 45099	2. DISTRICT CODE 2 5 0 5
	3. TYPE OF INSPECTION <input checked="" type="checkbox"/> MEAT <input type="checkbox"/> POULTRY <input type="checkbox"/> IMPORT	
	4. DATE OF SURVEY 07/01/2013	
	5. NAME AND MAILING ADDRESS OF APPLICANT Responsible Transportation 22034 200th Street Sigourney, IA 52591	
6. LOCATION OF ESTABLISHMENT (If different from item 5) Same as item 5		7. ADDRESS OF DISTRICT OFFICE Federal Building, Room 985 210 Walnut, Des Moines, IA 50309

8. DATE ESTABLISHMENT WILL BE READY FOR SERVICE

07/02/2013

9. RECOMMEND FOR GRANTING INSPECTION SERVICE?

☒ YES ☐ NO

10. ASSIGNMENT WILL BE COVERED BY: (Number)

FULL-TIME INSPECTORS

PART-TIME INSPECTORS

1

REMARKS (Use additional sheet pages as necessary)

On July 1, 2013, [redacted] FLS, Iowa City Circuit, Dr. [redacted] DVMS, Des Moines District, [redacted] FLS, Des Moines District, and Dr. [redacted] EIAO Des Moines District visited Responsible Transportation, located at 22034 200th Street, Sigourney, IA, for the purpose of verifying regulatory compliance for the purpose of recommendation for the issuance of a conditional grant to aforementioned business.

Written documents including Lockout/Tagout, Hazard Analysis, HACCP Plan, SSOP's, SPS, recall program, humane handling program, state permit for water treatment and potable water at the establishment, program regarding contracting for removal of offal, and in plant food defense program. Label files and sketches were reviewed for regulatory compliance. Security for accountable items was confirmed.

The facility was toured with the following findings:

1. There are adequate exits and signs identifying exits.
2. The facility was reviewed for obvious safety hazards.
3. Welfare facilities were toured and found to be meet regulatory compliance.
4. Antemortem facilities were reviewed for regulatory compliance of lighting, suspect pen facilities/lighting, adequate repair, and humane handling considerations. The area was found to be in regulatory compliance.
5. The kill floor area was then toured and reviewed for regulatory compliance (especially reviewing lighting, equipment, retained product facilities, and condemned/inedible facilities and procedures. This area was consistent with regulatory requirements.
6. The cut floor was toured noting facilities, equipment, retained product and condemned/inedible facilities and finding this area compliance with regulatory requirements.
7. During the tour USDA office facilities, Welfare Facilities, and Facilities for Program Personnel were observed. These areas were consistent with regulatory compliance.
8. Throughout the tour materials and construction of walls, floors, ceilings, doors, ventilation in both production areas and welfare areas, plumbing materials, pipes, water supply and drains were observed and found to be compliant with applicable regulations.
9. The unloading docks, drive alleys, holding pens, suspect pen, and flooring were all observed and found to be compliant with 9 CFR 313.

Attachments Included:

1. Hours of Operation Request
2. State of Iowa Potable Water Permit
3. State of Iowa Wastewater Treatment System Permit
4. MOI Dated May 30, 2013, authored by EIAO [redacted] provided her opinion of regulatory compliance of written programs to be implemented by Responsible Transportation.
5. FSIS 5200-4 developed for written programs of Responsible Transportation supporting the issuance of a conditional grant.
6. Facility schematic diagram
7. HACCP Systems Basic Compliance Checklist (FSIS Form 5000-1)
8. E Coli Testing Basic Compliance Checklist (FSIS Form 5000-3)
9. Sanitation SOP's -- Basic Compliance Checklist (FSIS Form 5000-2)
10. Completed Circuit Supervisor On-Site Survey Checklist

The above-named establishment was surveyed and found to be in compliance as indicated above. Service should be inaugurated as indicated in item 8 above.

CIRCUIT SUPERVISOR'S SIGNATURE [redacted] DUM	DATE 1 July 2013
REPLACES FSIS FORM 5200-4 (12/86), WHICH IS OBSOLETE.	

Circuit Supervisor On-Site Survey Checklist

1. District/Circuit Code 2505	2. Establishment Number 45099	3. Date of Survey 1 July 2013
4. Establishment Name Responsible Transportation		6. Establishment Address 22034 200th Street Sigourney, IA 52591
5. Establishment Telephone Number 319-804-9024		

Categories	Comply	Does Not Comply	Categories	Comply	Does Not Comply
I. Required Documents			IV. Safety		
Written Sanitation SOP	✓		Lock-out/Tag-out	✓	
Written HACCP plan	✓		Adequate exits	✓	
Water potability certification	✓		Hazards	✓	
Sewage certification	✓				
Other certifications (e.g. Inedible)			V. Facilities & Equipment		
			Welfare facilities	✓	
II. Marks of Inspection			Outside premises (Includes pest & rodent control)	✓	
Labels reviewed	✓		Antemortem		
Brands	✓		Facilities and lighting	✓	
Security for accountable items	✓		Suspect pen facilities/lighting	✓	
			Animal humane facilities	✓	
II. Building Construction			Postmortem		
Buildings, structures and rooms	✓		Facilities & equipment	✓	
Walls	✓		Lighting	✓	
Floors	✓		Retained product facilities	✓	
Ceilings	✓		Condemned/Inedible facilities	✓	
Doors	✓		Processing		
Ventilation in production areas	✓		Facilities & equipment	✓	
Ventilation in welfare facilities	✓		Retained product facilities	✓	
Separation of official & non-official establishments *	✓		Condemned/Inedible facilities	✓	
Facilities for Program Employees	✓				
Plumbing					
Water supply and distribution	✓				
Drains	✓				

Notes

The entire facility is being maintained as the official facility.

The facility was in compliance with regulatory requirements at the time of walk through - 1 July 2013

Facility meets regulatory requirements, therefore, recommend issuing conditional grant.



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

May 21, 2013

Inspector in Charge
Responsible Transportation, LLC
22034 200th St.
Sigourney, IA 52591

To Whom It May Concern:

The Responsible Transportation plant has its own potable water system, consisting of 3 on-site wells and treatment. The system was issued DNR public water supply operation permit #54-75-101 by this department on 2-25-2013. This permit authorizes Responsible Transportation to operate the public water supply subject to the applicable sections of Iowa Code including chapter 455B and part 567 of the Iowa Administrative Code. I inspected this water system on 2-4-2013 and find that it meets this department's standards for public water supplies, providing potable water.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU

Paul Brandt
Environmental Specialist Senior

J:\pbrandt\ww\RT-USDA-0513

cc: File - Industrial WW/WS



STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

April 18, 2013

Inspector in Charge
Responsible Transportation, LLC
22034 200th St.
Sigourney, IA 52591

To Whom it May Concern:

The Responsible Transportation plant has its own industrial wastewater treatment system authorized by DNR NPDES operating permit #54-75-1-00. I inspected this wastewater system on 4-2-2013 and find the system adequate for their wastewater treatment needs.

Sincerely,

FIELD SERVICES & COMPLIANCE BUREAU

Paul Brandt
Environmental Specialist Senior

J:\pbrandt\ww\RT-USDA-0413

xc: File - Industrial WW



United States
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Des Moines District Office
Neal Smith Federal Building
210 Walnut, Room 985
Des Moines, IA 50309-2123

Date: May 30, 2013

RE: Review at Responsible Transportation LLC

Reviewer: EIAO [REDACTED]

Documents included for Review: GMPs, SSOPs, SOPs, HACCP Plans (Slaughter and Raw Intact)

Disclaimer: The documents reviewed were reviewed from the perspective of meeting current regulatory requirements, and comments should be viewed in that light. Since these plants have not been implemented yet, it is up to the establishment to ensure that regulatory requirements are met once it is implemented.

Comments from Review

The establishment is preparing for start up and requested a visit from FLS Dr. [REDACTED] EIAO [REDACTED] was instructed to accompany him and complete a follow-up review of their food safety programs. A preliminary review had been conducted in March 2013. The equine slaughter and processing plans were presented for review, as well as GMPs, SOPs, SPS, and SSOPs. At 1000 hours I met with CFO Chase Greiner, Keaton Walker, Travis Bouslog. There were various items discussed, including:


1. In the Slaughter plan, management has identified *Salmonella*, *E. coli* O157:H7, and *Campylobacter* as potential hazards. Those are addressed through [REDACTED]. In addressing the hazard of residues, management is using [REDACTED].
2. In both the Slaughter and the Processing plans, supporting documentation was reviewed which supported the critical limits and frequency. After discussion regarding the need to verify monitoring activities at increased levels to generate plant history prior to going to frequencies chosen, management changed the frequency of [REDACTED].
3. The SSOPs were reviewed and they describe both pre-operational and operational steps to maintain sanitary conditions in the establishment.

A walk through of the facility was conducted. Except for some final plumbing, all construction appears to be completed. Dr. [REDACTED] stated he will conduct the final walk through as soon as management notifies him they are ready.

The review shows the establishment meets basic requirements in their HACCP, SPS, and SSOP programs, with adequate supporting documentation. They have implemented a generic *E. coli* program that will comply with regulatory guidelines, following frequencies for very small plants. They have a written recall plan in place.

Given this information it is my recommendation that the establishment be given a conditional grant of inspection.

If you have any questions, please let me know.

 ELAO
Des Moines District Office
USDA FSIS OFO

