

## 2014 - 2015 County Feedlot Program Delegation Agreement and Work Plan (January 1, 2014 – December 31, 2015)

County: MARTIN COUNTY

County Feedlot Officer(s): Pam Flitter/Wendy Chirpich

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The revised rules adopted on October 23, 2000, require a Delegated County (County) to prepare a Delegation Agreement that describes the County's plans/strategies and goals for administration and implementation of the Feedlot Program. The attached Work Plan satisfies the Minnesota Rules Chapter 7020 requirement that the Delegation Agreement must be reviewed and approved by the Delegated County and the Minnesota Pollution Control Agency (MPCA) annually.

Minnesota legislative appropriation language (Minnesota Statutes 116.0711) contains provisions for reducing grants to Delegated Counties if they do not meet minimum program requirements (MPRs) as set forth in this document. Counties that fail to meet the 7% inspection rate MPR and/or 90% of non-inspection MPRs are subject to having base grant reductions and/or loss of eligibility for a performance award.

For any feedlot in which a County employee or a member of the County employee's immediate family has an ownership interest, the County employee will not:

- (a) Be involved in making preliminary or final decisions to issue a permit, authorization, zoning approval, or any other governmental approval for the feedlot;
- (b) Conduct or review inspections for the feedlot.

This County Feedlot Program Delegation Agreement and Work Plan has been prepared by the County for the period of January 1, 2014 – December 31, 2015. The County agrees with the terms and conditions established in this Agreement and will use feedlot grant funds in conjunction with the required local match dollars and in-kind contributions to carry out the goals, plans and minimum program requirements described herein. The County understands that this Work Plan will be reviewed by the MPCA after completion of the first year of the Agreement and, if necessary, will be revised.

<b>Signature of Chair of Board of County Commissioners</b>	<b>Date</b>

## A. Work Plan Strategies

The strategies component of the Work Plan fulfills County rule requirements (7020.1600, Subp. 3a.) that state the County must develop annual plans and goals in accordance with registration, inspection, scheduled compliance and owner assistance responsibilities.

**Registration Strategy:** Please address the following registration strategy criteria.

1. *Please indicate the method(s) the County will use to provide a feedlot owner with a registration receipt. For additional methods and requirements see the Annual Report Guidance document.*
  - a. *A 30-day Registration Receipt Letter.*
  - b. *A 30-day Inspection Letter that contains confirmation of re-registration.*
  - c. *A permit cover letter or Certificate of Registration that contains confirmation of re-registration.*
  - d. *Verbal notification of re-registration as documented by a log.*

**Mail a copy of inspection report form (county & state) with registration information and signatures with statement "This is your re-registration receipt" on county form with the original placed in file.**

2. *Please indicate the type of registration form used by the County:*
  - a. *MPCA standard registration form.*
  - b. *County designed form. A copy of the form must be attached to the completed work plan.*

**Both MPCA standard registration form and a county designed form ~ attached**

3. *Please describe how the County will address facilities that upon re-registration show an increase in animal units, a change or addition to animal types or newly constructed animal holding or manure storage areas.*

***All facilities that have an increase or change in AU/type will be contacted for an onsite inspection. The inspection will be used to allow feedlot staff the opportunity to provide information to the owner/operator regarding MN Rule 7020 requirements for expansion of a facility.***

4. *Please describe the strategy and timeline that the County intends to follow to address facilities that have not met the re-registration deadline by January 1, 2014 and/or any continuous registration strategy over the next two years.*

**Continue to maintain a database containing the following information for all feedlot required to register ~ date registration form was complete, number/types of animal at facilities, name/address of all owners, identify surface waters within 1,000' of facility, facility location according to township/section/quarter section, presence/type of manure storage areas, permit/certificate number of owners who have been issued an agency/county feedlot permit/COR, shortest distance from an animal holding area or manure storage area to wells/surface waters, types of animal holding areas including pastures/confinement barns and open lots, the name of the person that completed the form registration information is updated as changes occur (sometimes daily) and submitted yearly for the Annual CFO Report. Martin County is also in full swing using delta and**

**Level II inventory method to conduct registration. A Level II inventory was completed in 1997. All feedlot sites with more than 10 animal units were visited. The site visits were/are conducted by the applicant (producer) with feedlot officer, feedlot technician or county contracted employee with notification and contact prior to the visit. Martin County intends to keep registration and inventory information data current through on-going feedlot program duties such as permitting and inspections. Feedlots not updated through standard permitting and inspection activities are contacted by phone for an update of the status of their operation and sign the re-registration with their information. Martin County will continue this requirement as long as the ordinance and county feels necessary with always meeting the 7%.**

### **Inspection Strategy:**

Delegated County must set inspection plans and goals for the purpose of identifying pollution hazards and determining compliance with discharge standards and schedules at sites with Open Lot Agreements (OLAs) (7020.1600 Subp. 3a. B.1 a. & 1b).

For assistance with completing this part of the work plan, please see Appendix A.

1. *Using the table below, please complete your **Production Site Inspection Strategy** in accordance with the following factors.*
  - a. *Your inspection strategy must include plans, as applicable, for conducting inspections at these sites:*
    - i. *Sites where an interim or CSF (CSF applies to  $\geq 300$  AU) permit is issued.*
    - ii. *Sites with signed open lot agreements (OLAs) that have never been inspected.*
    - iii. *Sites required to be registered that have never been inspected.*
  - b. *In addition to the feedlot types identified in Item 1, please enter into the table one or more of the following listed strategies. You may also propose an alternative strategy:*
    - i. *The County goal is to inspect sites within shoreland and/or a DWSMA.*
    - ii. *The County inspects all feedlots in the County on a 5 year or less rotating basis.*
    - iii. *The County will place an emphasis on inspections at sites within a defined jurisdiction such as feedlots in a TMDL watershed, a township, or some other formally designated area.*
    - iv. *The County will place an emphasis on inspections at sites within a specified size category such as 300 – 499 AU or 500 – 999 AU.*
    - v. *The County will place an emphasis on inspections at sites that, according to previous inspections, have not been maintaining manure management records.*
    - vi. *Alternative strategies; please list in the table.*
  - c. *For each required strategy that applies and/or for each chosen strategy you list in the table, you must enter the total number of feedlots of that type you estimate are in your County (or other jurisdiction you have identified) and the number of those feedlots you intend to inspect.*

## Production Site Inspection Strategy Goals

Feedlot Type	Total Number (as defined by area, size, type, location, compliance status or other parameter)	Inspection Goal 2014	Inspection Goal 2015
<b>Required Strategy.</b> Inspect all sites where an interim or CSF (CSF for $\geq 300$ only) permit is issued.	<i>As needed. This number is dependent upon those sites under construction and will vary dependent on the year and economic climate of the county. A site visit will occur for each new permit.</i>	<i>As Needed</i>	<i>As Needed</i>
<b>Required Strategy.</b> Inspect sites with OLAs that have never been inspected:	0	0	0
<b>Required Strategy.</b> Inspect sites required to be registered that never been inspected.	0	0	0
<b>The County will place an emphasis on inspections at sites that, according to previous inspections, have not been maintaining manure management records.</b>	<i>500 eligible for funding however, approximately 330 are non-NPDES</i>	50-60	50-60
<b>Inspect all facilities that apply for a conditional use permit</b>	<i>Number of these applications varies from year to year.</i>	<i>As Needed</i>	<i>As Needed</i>
<b>Total</b>		50	50

2. Using the table below, please complete your **Land Application Inspection Strategy** in accordance with the following factors.
  - a. Enter in the table below one or more of the following land application inspection strategies for addressing land application of manure, nutrient management planning and record keeping. You may also propose an alternative inspection strategy. See the Annual Report Guidance Document for more information on Land Application Inspections.
    - i. The County goal is to perform a Level II Land Application Inspection review as part of any Compliance inspection conducted at Non-NPDES sites >300 AU.
    - ii. The County will conduct Level III Land Application Inspections at all sites within a defined jurisdiction such as feedlots in a TMDL watershed, a township, or some other formally designated area.
    - iii. The County will conduct Level I inspections at sites that, according to previous inspections, have not been maintaining manure management records.
    - iv. Alternative strategies; please list in the table.

b. For each strategy that you list in the table, you must enter the total number of feedlot sites defined by the strategy and the number of those sites at which you intend to conduct land application inspections.

**Land Application Inspection Strategy Goals**

<b>Feedlot Type</b>	<b>*Total Number (as defined by area, size, type, location, compliance status or other parameter)</b>	<b>*Inspection Goal 2014</b>	<b>*Inspection Goal 2015</b>
<i>Review from previous inspections in the past at sites that, have not been maintaining manure management records.</i>	<i>This number will vary depending on previous Inspection results</i>	As needed	As needed
<b>Total</b>		<i>As Needed</i>	<i>As Needed</i>

\*Numbers entered into the table for Level III land application strategy goals must be quantified by feedlot site and not by individual fields.

**Compliance Strategy:** Please describe your compliance strategy for 2014-2015.

1. Please state the various method(s) and practice(s) that the County will use in response to **production site inspections** that result in non-compliance, including facilities that have failed to meet OLA timelines:
  - a. Include corrective actions in the inspection results notification letter, where corrective actions can be completed in 30-days or less.
  - b. Issue a Letter of Warning (LOW) or a Notice of Violation (NOV) that will include corrective actions and deadlines.
  - c. Issue an Interim Permit that includes timelines for corrective actions.
  - d. Document in a letter to the owner that indicates another agency (NRCS or SWCD) is working to correct identified pollution hazards.
  - e. Other strategies, as described in the space below.

- **The method chosen by the County will be dependent on the type and level of severity of non-compliance.**
- **Martin County notifies producers in writing, when a compliance inspection indicates that a moderate or severe pollution hazard exists and that corrective actions or fixes are required. This notification will be sent by mail to the producer within 30 working days of the inspection (includes LOW or NOV if necessary) and will contain the following information:**
  1. **The feedlot owner’s obligations to apply for a permit.**
  2. **Corrective measures need to return to compliance and deadlines for completing any action(s).**
  3. **Issue Interim Permit**
  4. **If follow up communication is required with the producer, this will take place within**

**30 working days of the request from the producer.**

- **Documentation of results of corrective actions to reduce runoff at open lot sites by conducting FLEval/MinnFARMS prior to subsequent to modifications and/or construction.**
- **Martin County has required for at least 20 years that all sites have manure management plans regardless of size with aerials highlighting their acres designated with in turn are digitized to be sure there are no duplication of acres being used.**
- **Martin County monitors to verify that agreed upon corrective actions are proceeding according to all conditions of non-compliance have been resolved.**

2. *Please indicate in the space below the various method(s) and practice(s) that the County will use in response to **land application inspections** that result in non-compliance:*
- Address non-compliance at the same time the facility non-compliance is addressed. See above.*
  - Include corrective actions in the inspection results notification letter, where corrective actions can be completed in 30-days or less.*
  - Issue a Letter of Warning (LOW) or a Notice of Violation (NOV) that will include corrective actions and deadlines.*
  - Document in a letter to the owner that indicates another agency (NRCS or SWCD) is working to correct identified pollution hazards.*
  - Other strategies, as described in the space below.*

**Same as above.**

3. *Please state the timelines (scheduled compliance goals) that the County intends to meet when using the methods and practices identified under item 1 and item 2:*
- Notification of inspection results informing the producer of non-compliance including the listing of any corrective action that can be completed within 30 days. Follow-up contact/communication to evaluate producer progress.*
  - Decision to escalate compliance action where progress on corrective actions is not forthcoming.*

**Notification of inspection results will be discussed with the producer during the on-site inspection and then included in the inspection follow up form. The follow up form will be sent by mail to the producer within 30 working days of the inspection (this includes LOW/NOV or interim permit if necessary). If there is a change to the schedule of compliance it must be discussed with the CFO prior to the change. If the level of enforcement is required to escalate due to failure to meet the schedule of compliance, the CFO will pursue appropriate action and communicate why the change occurred to the producer. If follow-up communication is required with the producer, this will take place within 30 workings days of the request from producer.**

**Owner Assistance Strategy:** The MPCA requests that delegated counties set specific owner assistance plans and goals.

1. *Please state the number and type of activities you plan to conduct. (Examples are: group education events; newsletters; newspaper articles; producer surveys; distribution of manure sample containers; aid in MMP writing.)*

- Newspaper articles in the spring/fall with reminders of construction/feedlot permit requirements along with manure application setbacks.
- January 23, 2014 scheduled producer Livestock Emergency Response Class

2. Please state your goals in terms of the number of feedlots owners that you expect to attend meetings hosted to provide producer training and education.

**We would like to reach as many producers as possible with educational needs. Although the feedlot program in Martin County is very mature it is a goal to continue to outreach with the producers as technology changes in the industry.**

3. Please state whether you intend to participate in the Owner Assistance Tracking project that is being directed by MACFO and that begins January 1, 2014.

**YES**

## B. Delegated County Minimum Program Requirements

Part 2 of County feedlot program legislative appropriation language for 2014-2015 states that 25% of the total appropriation must be awarded according to the terms and conditions of the following Minimum Program Requirements (MPRs).

### 1. Inspection Minimum Program Requirement

A delegated County must inspect 7% or more of their feedlots annually, as determined by the table below, to be eligible for the Inspection Minimum Program Requirement award.

<b>Inspection Minimum Program Requirement:</b>	<b>July 1 – Dec. 31, 2014</b>	<b>Jan. 1 –Dec 31 2015</b>
1. <b>Agency-approved number required to be registered.</b> Please enter the number that is shown for your County on the 2014 County Program Base Grant Award Schedule, Appendix B. (These numbers may be modified upon finalization of the January 1, 2014 re-registration update.)	___500___	___500___
2. <b>County – Agency agreed upon inspection rate.</b> The inspection rate is 7% for 2014 and 2015 unless otherwise negotiated by the two parties.	__35___	__35___
3. <b>County – Agency agreed upon inspection number for the identified time period.</b> (These numbers may be modified upon finalization of the January 1, 2014 re-registration update.)	___35___	___35___

### 2. Other Minimum Program Requirements

<b>Registration Minimum Program Requirements:</b>	<b>YES</b>	<b>NO</b>
<p>1. The County will register and maintain registration data in the Delta database in accordance with MN R. Ch. 7020.0350 Subp. 1 and 7020.1600, Subp. 2. C.</p> <p><i>A County program review indicates that the County uses the MPCA standard feedlot registration form or has been approved to use a County-designed registration form and updates Delta with the registration information acquired from registration forms and/or permit application. Fields that must be updated continuously include shoreland status, Drinking Water Supply Management Area (DWSMA) and Open Lot Agreement (OLA) as agreed to by FMT-MACFO in 2013.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>2. The County issues a registration receipt to the feedlot owner within 30 days of receipt of the registration form. (7020.0350, Subp. 5.)</p> <p><i>File reviews indicate that the County has fulfilled the registration receipt requirement as stated in their registration work plan strategy.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Inspection Minimum Program Requirements:</b>	<b>YES</b>	<b>NO</b>
<p>3. The County maintains a record of all compliance inspections, including land application review results, conducted at feedlots required to be registered. At a minimum, counties must maintain on file, electronic or paper, a completed copy of the Non-NPDES Inspection Checklist. (7020.1600, Subp. 2. H.)</p> <p><i>File reviews indicate that the County uses, and maintains on file, inspection documentation in accordance with the above requirement.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>4. The County completes entry of data from all feedlot compliance inspections, including land application review results, at feedlots required to be registered, into Delta and in accordance with Delta inspection fields by February 1 of the year following the end of the program year. (7020.1600, Subp. 2. H.)</p> <p><i>A Delta database query indicates that entry of inspection data into Delta occurs within required parameters.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>5. The work plan contains an inspection strategy that has been approved by the agency. (7020.1600, Subp. 3a.B.(1-2))</p> <p><i>The Annual Inspection Strategy Progress report (located in the Supplemental Information Page section of the Annual County Feedlot Officer and Performance Credit Report) indicates that the County initiated inspection plans and goals as stated in their inspection strategy.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Compliance Minimum Program Requirements:</b>	<b>YES</b>	<b>NO</b>
<p>6. The County will notify the producer, in writing, of the results for any compliance inspection conducted. The notification must include a completed copy of the Non-NPDES Inspection Checklist.(7020.1600, Subp. 3a.B. (5a.))</p> <p><i>File review indicates that the County has notified the producers of compliance inspection results. Notification must be in writing either by letter or by a document, signed by the producer, that he/she has viewed and agreed with the completed inspection report and waives any further notification of results by mail.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>7. The County will bring feedlot operations into compliance through the implementation of scheduled compliance goals as stated in their compliance strategy (7020.1600, Subp. 3a.B.(5)).</p> <p><i>File reviews indicated that, in matters of non-compliance, the County followed their compliance strategies.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>



<p>8. The County maintains documentation and correspondence for any return to compliance from a documented non-compliance status. (7020.1600, Subp. 2.H.)</p> <p><i>When a County records a corrective action in Delta, the file contains documentation by either the County or other party verifying that the corrective action was implemented and/or installed.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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<b>Permitting Minimum Program Requirements:</b>	<b>YES</b>	<b>NO</b>
<p>9. The County will issue permits within the 60/120 day time period according to Minn. Stat. 15.99. (7020.0505, Subp. 5.B.)</p> <p><i>Files reviews indicate that the County:</i></p> <ul style="list-style-type: none"> <li><i>a. Date stamps applications and all its components</i></li> <li><i>b. Incomplete letter are used when applicable</i></li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>10. The County will make sure all permit applications are complete. (7020.1600, Subp. 2.C.)</p> <p><i>Files reviews indicate that the County uses an agency approved application checklist and that applications are complete.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>11. The County will ensure producer compliance with required notifications. (7020.2000, Subp. 4 and Subp. 5)</p> <p><i>Public notifications for new or existing feedlots with a capacity of 500 AU or greater proposing to construct or expand must include the following information:</i></p> <ul style="list-style-type: none"> <li><i>a. Owner's names or legal name of the facility;</i></li> <li><i>b. Location of facility - County, township, section, and quarter section;</i></li> <li><i>c. Species of livestock and total animal units;</i></li> <li><i>d. Types of confinement buildings, lots, and areas at the animal feedlot; and</i></li> <li><i>e. Types of manure storage areas;</i></li> </ul> <p><i>Public notification completed by:</i></p> <ul style="list-style-type: none"> <li><i>a. Newspaper (affidavit in file)</i></li> <li><i>b. Written Notice Location</i></li> <li><i>c. Conditional Use Permit Notice</i></li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>12. Appropriate permit issuance after completion of required notifications. (7020.2000, Subp. 5)</p> <p><i>File reviews indicate that permits have been issued after the appropriate number (20) of business days following public notifications.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>13. The County will ensure that MMP (manure management plan) conditions have been met according to 7020.2225, Subp. 4.D. prior to permit issuance (7001.0140).</p> <p><i>File reviews indicate that a MMP and a manure management plan checklist completed by the CFO is on file for any Interim permit issued; a manure management checklist completed by the CFO is on file for any Construction Short-Form permit issued for a feedlot with <math>\geq 300</math> AU where manure is non-transferred; and a completed copy of the document "MMP When Ownership of Manure is Transferred" is on file for a feedlot with <math>\geq 300</math> AU where manure is transferred.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>14. The County will ensure that producers who submit a permit application that includes a liquid manure storage area (LMSA) meet the requirements set forth in 7020.2100.</p> <p><i>File reviews indicate that the County uses an agency approved LSMA checklist and that plans and specifications are complete.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

15. The County will ensure that any pollution problem existing at a producer's site will be resolved before the permit is issued or is addressed by the permit. (7020.0500, Subp. 5.B. and 7001.0140) <i>File reviews indicate that the County issues Interim permits in appropriate situations.</i> <i>File reviews indicate that the County conducts an inspection prior to permit issuance.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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<b>Complaint Response Minimum Program Requirements:</b>	<b>YES</b>	<b>NO</b>
16. The County maintains a record of all complaint correspondence. (7020.1600, Subp. 2.H. and Subp. 2.J.(6)) <i>The County maintains a complaint log and promptly reported to the MPCA any complaints that represented a possible health threat, a significant environmental impact or indicated a flagrant violation</i> <i>The complaint log record includes the following information:</i> <ul style="list-style-type: none"> <li>a. <i>The type of complaint.</i></li> <li>b. <i>The location of the complaint.</i></li> <li>c. <i>The date and time the complaint was made.</i></li> <li>d. <i>The facts and circumstances related to the complaint.</i></li> <li>e. <i>A statement describing the resolution of the complaint.</i></li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Owner Assistance Minimum Program Requirements:</b>	<b>YES</b>	<b>NO</b>
17. The work plan contains owner assistance goals that have been approved by the agency. (7020.1600, Subp. 2.J.(5) and Subp. 3a.B.(7)) <i>The annual delegation review indicates that the County initiated plans in accordance with their owner assistance work plan strategy.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Staffing Level and Training Minimum Program Requirements:</b>	<b>YES</b>	<b>NO</b>
18. The CFO (and other feedlot staff) attends training necessary to perform the duties of the feedlot program and is consistent with the agency training recommendations. (7020.1600, Subp. 2.K.) <i>The County completed a minimum of 18 continuing education units (CEU); each unit consisting of one hour of training related to Minnesota Rules Chapter 7020 competency areas: Regulating new construction; conducting inspections and evaluating compliance; handling complaints and reported spills; responding to air quality complaints, resolving identified pollution problems, communicating with farmers and the agricultural community.</i> <i>(See Annual CFO Report Form Guidance document for more information about Training Performance credits.) All training sessions attended by the County must be submitted with the Supplementary Report Form.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Air Quality Minimum Program Requirements:</b>	<b>YES</b>	<b>NO</b>
19. The County maintains a record of all notifications received from feedlot owners claiming air quality exemptions including the days exempted and the cumulative days used. (7020.1600, Subp. 2.I.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<p><i>The County maintains a pumping notification log.</i></p> <p><i>The record includes the following information:</i></p> <ul style="list-style-type: none"> <li><i>a. Names of the owners/legal facility name</i></li> <li><i>b. Location of the facility (County, township, section, quarter)</i></li> <li><i>c. Facility permit number</i></li> <li><i>d. Start date and number of days to removal</i></li> </ul>		
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<b>Web Reporting Requirement:</b>	<b>YES</b>	<b>NO</b>
<p>20. The County maintains an active Web site listing detailed information on the expenditure of County program grant funds and measureable outcomes as a result of the expenditure of funds. (H.F. No. 2123, 86<sup>th</sup> Legislative Session, Article 1, Section 3, Subdivision 1)</p> <p><i>As of July 1 of the current program year the following reports for the previous program year have been maintained on the County's web site:</i></p> <ul style="list-style-type: none"> <li><i>a. NRBG feedlot program financial report as recorded on eLINK</i></li> <li><i>b. Annual CFO Report</i></li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## The 2014 - 2015 County Feedlot Program Delegation Agreement and Work Plan Review Summary

**A. County Need Requests.** Please state any specific resources that you are requesting the MPCA to provide in administering the County feedlot program in your County:

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**B. Agency Response/Comment to County Need Requests:**

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**C. Documentation of Work Plan Revisions and/or Alternate Methods for Meeting MPRs.**

Any work plan revisions including any alternate methods for meeting MPRs that have been agreed to by both parties must be documented in this space.

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**D. Work Plan Approval**

The 2014-15 delegation agreement and work plan has been reviewed and satisfactorily addresses delegation agreement requirements.

*Yes*     *No*

The comments as recorded in the above parts together with the signatures of represented parties constitute that review of the delegation agreement has been conducted and that agreement of delegated County duties and goals by the MPCA and the County for the January 1 – December 31, 2014 period has been achieved.	County Feedlot Officer: <hr/>	
	_____ (Signature County Feedlot Officer)	_____ (Date)
	MPCA Representative: <hr/>	
	_____ (Signature MPCA Representative)	_____ (Date)

## 2014 – 2015 Work Plan Inspection Strategy

### Guidance

The inspection strategy section of the work plan is substantially new for 2014 – 2015. We have provided this special guidance section to ensure that CFOs not only understand the changes but can prepare inspection goals in line with the changes.

#### **Changes to the work plan inspection strategy for 2014 – 2015:**

1. The County must prepare a production site and a land application site inspection goal strategy.
  - Production site inspection. A production site inspection is a full-compliance inspection where all applicable parts of the non-NPDES inspection checklist must be completed including a Level I land application review.
  - Land application inspection. Three types of land application inspections can be conducted - Level I, Level II and Level III. The non-NPDES inspection checklist must be used to document land application inspection results and the results must be entered into Delta. None of the three types of land application inspections meet the definition of a compliance inspection. A Level II land application inspection is possible only if records are sufficient to meet Level I inspection requirements.
2. The production site inspection component has three mandatory inspection strategy requirements.
  - No. of sites the County anticipates inspecting as a result of issuances of interim or CSF permits (CSF issuance applies to  $\geq 300$  AU).
  - No. of sites with a signed OLA that have never been visited.
  - No. of sites required to register that have never been visited.
3. Compliance and construction inspections conducted as a result of the production site strategy count toward the minimum 7 percent rate; land application inspections conducted as a result of the land application strategy do not count toward the 7 percent inspection rate.
4. The County must write an annual inspection strategy progress report that addresses County results for both production and land application goals. The inspection strategy progress report will be included in the Supplemental Section of the Annual County Feedlot Officer and Performance Credit Report. The County needs to be realistic in their inspection strategy because they will be required to answer if they fail to meet their goals. See MPR No. 5.

As part of developing a realistic inspection strategy the County needs to consider all of their strategies (production and land application) and the time commitment required. The County should not design their inspection goals to simply meet the 7% minimum inspection rate. Rather the

county is urged to set inspection goals according to their inspections needs such as feedlots that have never inspected or feedlots with OLAs not inspected.

There will be no penalty if the County does not meet their strategies as long as they have valid reasons for not meeting it. The MPCA understands this is only a plan and that things happen. But the expectation is that the CFO communicates with their regional staff in a timely manner if they feel they will not be able to meet their goals during the year.

### **Recommended approach for developing production site inspection goals:**

Please complete the following steps to prepare your production site inspection strategy goals.

**Step 1.** The first step is to calculate the number of feedlots that the County intends to inspect annually. We suggest that the County set a goal of inspecting 10 percent of the total number of feedlots required to be registered in the County. (We suggest 10 percent to ensure that the County meets the 7 percent required inspection rate.) Given this formula, a County with 300 feedlots would need to conduct 30 compliance and/or construction inspections annually.

**Step 2.** The second step is to calculate the number of sites in the county that are subject to the three required inspection strategy categories (See bullet 2 in previous section). For example a County may estimate that, based on past experience, they will need to inspect about 15 sites as a result of permit issuance requirements; and, they estimate that they have 10 sites with signed OLAs that have never been inspected; and, they estimate that they have 50 sites required to be registered that have never been visited. In this case the total number of sites needing to be inspected, as a result of the required inspection strategies, is 80.

**Step 3.** The third step is to decide how many inspections the County can conduct in each of the required categories over the next two years. The County must plan to inspect all sites each year where permits are being issued. However, counties may be able to complete only a fraction of the inspections over the next two years at feedlots that have never been inspected or with signed OLAs that have never been inspected. The reason is that some counties still have hundreds of sites that have never been inspected or sites with signed OLAs that have never been inspected. In the example that we are using, the County has determined that they can do a total of 30 inspections annually (See Step 1) and that 15 of them will be due to permit issuances (Step 2). This leaves 15 inspections available for sites that are required to be registered but have never been inspected and sites with signed OLAs that have never been visited.

**Step 4.** This step only applies to counties where the number of planned inspections, as defined by the three required inspection strategy categories, is less than 10% of the total number of feedlots in the County. In that event the County must choose additional inspection strategies (listed in the work plan or proposed by the County) whereby the county will be assured of meeting the 7% minimum inspection requirement.

## Appendix B

### FY 2014 County Program Base Grant Award Schedule (July 1, 2013 - June 30, 2014) \$1,959,000 Appropriation

Delegated County	Feedlots Eligible for Funding	2014 Base Grant Award	County Match Requirement
Big Stone	65	\$7,500	\$5,250
Blue Earth	358	\$32,177	\$22,524
Brown	389	\$34,963	\$24,474
Carver	264	\$23,728	\$16,610
Clay	113	\$10,156	\$7,109
Cottonwood	302	\$27,144	\$19,001
Dakota	183	\$16,448	\$11,514
Dodge	304	\$27,324	\$19,127
Douglas	411	\$36,941	\$25,859
Faribault	430	\$38,648	\$27,054
Fillmore	866	\$77,836	\$54,485
Freeborn	356	\$31,997	\$22,398
Goodhue	769	\$69,118	\$48,383
Houston	447	\$40,176	\$28,123
Jackson	346	\$31,098	\$21,769
Kandiyohi	450	\$40,446	\$28,312
Kittson	25	\$7,500	\$5,250
Lac Qui Parle	189	\$16,987	\$11,891
Lake of the Woods	29	\$7,500	\$5,250
Le Sueur	185	\$16,628	\$11,640
Lincoln	430	\$38,648	\$27,054
Lyon	338	\$30,379	\$21,265
McLeod	357	\$32,087	\$22,461
Marshall	67	\$7,500	\$5,250
Martin	500	\$44,940	\$31,458
Meeker	315	\$28,312	\$19,818
Morrison	592	\$53,209	\$37,246
Mower	361	\$32,447	\$22,713
Murray	462	\$41,525	\$29,068
Nicollet	347	\$31,188	\$21,832
Nobles	452	\$40,626	\$28,438
Norman	46	\$7,500	\$5,250
Pennington	47	\$7,500	\$5,250

Pipestone	524	\$47,097	\$32,968
Polk	82	\$7,500	\$5,250
Pope	334	\$30,020	\$21,014
Red Lake	37	\$7,500	\$5,250
Renville	323	\$29,031	\$20,322
Rice	341	\$30,649	\$21,454
Rock	514	\$46,198	\$32,339
Sibley	337	\$30,290	\$21,203
Stearns	1,539	\$138,325	\$96,828
Steele	285	\$25,616	\$17,931
Stevens	156	\$14,021	\$9,815
Swift	152	\$13,662	\$9,563
Todd	806	\$72,443	\$50,710
Traverse	44	\$7,500	\$5,250
Wabasha	506	\$45,479	\$31,835
Wadena	123	\$11,055	\$7,739
Waseca	248	\$22,290	\$15,603
Watonwan	203	\$18,246	\$12,772
Winona	592	\$53,209	\$37,246
Wright	285	\$25,616	\$17,931
Yellow Medicine	300	\$26,964	\$18,875
<b>TOTAL</b>	<b>18,526</b>	<b>\$1,692,887</b>	<b>\$1,185,021</b>