Monitoring, Reporting & Compliance

2017 CAFO Meetings
Overview

• Standard Compliance & Reporting
  – Annual Reports – typically due January 31\textsuperscript{st}
  – NMP Update Reports – typically due March 31\textsuperscript{st}
  – Permit Schedules (see permit)

• Spill / Non-compliance reporting review
Annual Reports

• Submit by January 31st (or date listed in permit if different)
  – Summary of inspections / noncompliance
  – Quarterly reports
  – Dates when manure storage reaches 180-day marker/capacity (Oct. 1st – Nov. 30th)
  – Total amount of manure & process wastewater generated in previous 12 months
  – Distributed manure (volume to approved entities and/or other permittee’s land not in your NMP)
  – Number & type of animals (use 3400-25A form)
  – Summary of proposed changes for the facility in the next 12 months (provide AU form for proposed expansions)
This is your one report a year to summarize compliance from previous year and let DNR know of any planned changes for upcoming year.
Nutrient Management Plan Update

- Stand alone complete NMP including updates
  - Crop rotations, manure applications, soil tests, restriction maps, monitoring activities, calibration records, etc.
- Updates include:
  - Non-manure or other offsite nutrient sources to fields
  - Updates to SNAP Plus data files/reports (or equivalent)
  - Updated maps
  - New* & removed fields (to confirm adequate land base)
    *Any new fields must be approved prior to use through online e-permitting system process
  - Headland stacking site information
  - Field verification results (prior to spreading)
  - Monitoring results (W soils, tile outlets...)
  - Should include spreading reports for previous and current crop years (i.e. 2016 and 2017)
- Typically due March 31\textsuperscript{st} each year (see permit)
- Coming soon – Online submittal
  - Release coming soon
This report covers all field application activities to demonstrate NMP implementation.

Also include 3400-025B and 590 checklists to certify entire NMP is compliant.
Permit Noncompliance – Self Reporting

- Any noncompliance associated with land application. Examples:
  - Manure leaving field site
  - Applying within setback area
  - Failing to get approval for new field
- Exceedance of maximum operating level in storage
- Failure to maintain 180 days of storage
- Failure to empty storage to 180 day capacity by December 5th
- Missing due dates in Schedules section of permit
- Failure to submit complete permit reissue application
- Production site containment system failure
**Permit Schedules**

### 2 Schedules

#### 2.1 Annual Reports

Submit Annual Reports by January 31st of each year in accordance with the Annual Reports subsection in Standard Requirements.

<table>
<thead>
<tr>
<th>Required Action</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Submit Annual Report #1:</td>
<td>01/31/2018</td>
</tr>
<tr>
<td>Submit Annual Report #2:</td>
<td>01/31/2019</td>
</tr>
<tr>
<td>Submit Annual Report #3:</td>
<td>01/31/2020</td>
</tr>
<tr>
<td>Submit Annual Report #4:</td>
<td>01/31/2021</td>
</tr>
<tr>
<td>Submit Annual Report #5:</td>
<td>01/31/2022</td>
</tr>
</tbody>
</table>

Ongoing Annual Reports: Continue to submit Annual Reports until permit reissuance has been completed.

#### 2.2 Nutrient Management Plan

<table>
<thead>
<tr>
<th>Required Action</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management Plan Submittals: Submit any necessary updates to the Nutrient Management Plan to meet the conditions outlined in this permit (see conditions in the Livestock Operational and Sampling Requirements section).</td>
<td>03/31/2017</td>
</tr>
<tr>
<td>Management Plan Annual Update #1: Submit an Annual Update to the Nutrient Management Plan by March 31st each year. Note: In addition to Annual Updates, submit Management Plan Amendments to the Department for written approval prior to implementation of any changes to nutrient management practices, in accordance with the Nutrient Management requirements in the Livestock Operational and Sampling Requirements section.</td>
<td>03/31/2018</td>
</tr>
<tr>
<td>Management Plan Annual Update #3:</td>
<td>03/31/2019</td>
</tr>
<tr>
<td>Management Plan Annual Update #4:</td>
<td>03/31/2020</td>
</tr>
<tr>
<td>Management Plan Annual Update #5:</td>
<td>03/31/2021</td>
</tr>
</tbody>
</table>

Ongoing Management Plan Annual Updates: Continue to submit Annual Updates to the Nutrient Management Plan until permit reissuance has been completed.

#### 2.3 Submit Permit Reissuance Application

<table>
<thead>
<tr>
<th>Required Action</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reissuance Application: Submit a complete permit reissuance application 180 days prior to permit expiration.</td>
<td>08/31/2021</td>
</tr>
</tbody>
</table>

#### 2.4 Manure Storage Facility - Modifications

<table>
<thead>
<tr>
<th>Required Action</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plans and Specifications: Submit plans and specifications for Department review and approval in accordance with Chapter 281.41, Wis. Stats., and Chapter NR 243, Wis. Admin. Code, to permanently correct any adverse manure storage conditions.</td>
<td>08/01/2017</td>
</tr>
<tr>
<td>Corrections and Post Construction Documentation: Complete construction on the manure storage facility that permanently corrects any adverse conditions in accordance with and approval by the Department, by the specified Date Due. Submit post construction documentation within 60 days of completion of the project.</td>
<td>11/01/2018</td>
</tr>
</tbody>
</table>

#### 2.4 Calf Hutch Runoff Control System - Installation

<table>
<thead>
<tr>
<th>Required Action</th>
<th>Due Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implement Interim Controls: Install temporary controls and manage area to ensure no runoff discharges from the calf hutch feedlot.</td>
<td>04/01/2017</td>
</tr>
<tr>
<td>Plans and Specifications: Submit plans and specifications for a permanent calf hutch feedlot runoff control system for Department review and approval in accordance with Chapter 281.41, Wis. Stats., and Chapter NR 243, Wis. Admin. Code. See Standard Requirements for plan content information.</td>
<td>08/01/2017</td>
</tr>
<tr>
<td>Complete Installation: Complete construction of runoff control system. System shall be functional and in operation by the specified Date Due. Post construction documentation shall be submitted within 60 days of completion of the project.</td>
<td>07/01/2018</td>
</tr>
</tbody>
</table>

Due dates can seldom be extended/changed so plan accordingly.
Spill Reporting

- Spills – any potential for manure to impact water (surface or groundwater)
  - Take action to stop discharge/clean-up spill
  - Call spills hotline: 1-800-943-0003
  - Follow-up reporting to DNR spill coordinator and permit contact

- Permittee/waste generator is responsible regardless of cause of spill (land application runoff, vehicle accident, hose break, etc.)
Spill Reporting Reminders

- Responsible Party (farm owner) should be the one to report the spill if possible.
- If manure applicator reports spill, the farm name responsible for the manure must be named.
- Don’t under report volumes or downplay impacts or risks of impacts to water quality.
- Explain what measures have been taken and are planned to be taken.
- It is beyond DNR staff’s scope to provide prescriptive clean up methods.
DNR spill response roles

- Receive notification of reportable spills
- Respond as necessary to ensure appropriate action is taken to clean up
- Determine that remedial clean-up activities are sufficient (restored to previous state as much as practicable)
- Take enforcement when necessary
General Reminders

• Review often!
  – Nutrient Management Plan
  – Permit & Monitoring Program
  – Emergency Response Plan

• Get expert’s assistance when needed
  – Engineering consultant
  – Crop consultant
  – Compliance expert
  – Spill response consultant

• Submit reports on time
  – Requirements apply regardless of DNR staff vacancies
  – Enforcement notice (typically an NON) will be issued for late reports/reports not received
Thank you for your attention, any questions?