

## MPCA County Feedlot Program Delegation Agreement Work Plan

Work Plan Years:	2016 – 2017
County:	Lyon
County Feedlot Officer(s):	John Biren
Primary Contact Person:	John Biren
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Amendment #:	

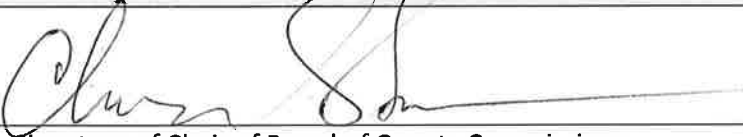

The revised rules adopted on October 23, 2000 and updated in January 2015, require a Delegated County (County) to prepare a Delegation Agreement that describes the County's plans/strategies and goals for administration and implementation of the Feedlot Program. The attached Work Plan satisfies the Minnesota 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 have been prepared by the County for the period of January 1, 2016 – December 31, 2017. 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.

	
Signature of Chair of Board of County Commissioners	Date

## A. Strategies

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

### Registration Strategy

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.

Most often a registration receipt letter will be sent to the producer (or "a"). In the event of a feedlot inspection or a permit issuance for expansion of a feedlot methods "b" or "c" may be used.

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.)

County designed form replicated from MPCA's standard form

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.

Lyon County will inform MPCA Regional Feedlot Staff. Two scenarios will arise: 1. The increased animal units will trigger a NPDES permit under MPCA or 2. The increased animal units will still fall under County permitting/regulation and a MinnFARM analysis will be completed to show that the increase does not present an environmental threat. Updated manure testing will be required from the producer. The county will also require sites greater than 500 existing animal units to obtain appropriate permitting if after-the-fact expansion occurred.

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.

Each producer who has not met the re-registration deadline will be contacted by phone, mail or in-person to identify the stocking status of the feedlot, current conditions, and proposed plans for the site.

**Inspection Strategy** For assistance with completing this part of the work plan please see Appendix A. A County must set inspection plans and goals for the purpose of identifying pollution hazards and determining compliance with discharge standards, rules and permit conditions.

Using the table below, please complete an inspection strategy in accordance with the following factors. The County's inspection strategy must include required goals, as applicable to the County, for conducting inspections at these sites:

- a. Sites proposing construction or expansion
- b. Sites with an Interim or Construction Short Form (CSF) permit. A CSF permit applies to sites with  $\geq 300$  AU.
- c. Sites with signed open lot agreements (OLAs) that have never been inspected
- d. Sites required to be registered that have never been inspected

#### Required Inspection Strategies

Strategy Goal	Inspection Goal 2016*	Inspection Goal 2017*
Sites proposing construction or expansion	4	4
Sites with an Interim or CSF permit	3	3
Sites with OLAs that have never been inspected	N/A	N/A
Sites required to be registered that have never been inspected	13	13
<b>Total</b>	<b>20</b>	<b>20</b>

*\*If applicable, enter a number or range for the number of sites the County predicts will be completed for each required strategy goal. If not applicable, simply enter N/A. There will not be a penalty if the County does not meet strategy goal numbers as long as there is a valid reason and the County communicates with the MPCA regional staff in a timely manner.*

The County's inspection strategy can also include goals, as applicable, for conducting inspections at high risk/high priority sites and/or low risk/low priority sites. Examples of these are listed below.

#### *HIGH RISK/HIGH PRIORITY SITES*

- a) *Sites within shoreland and/or a Drinking Water Supply Management Area (DWSMA), Watershed Restoration and Protection Strategy (WRAPS) and/or a TMDL.*
- b) *Sites that, according to previous inspections, have not been maintaining adequate land application records and/or manure management plans.*
- c) *Sites that have an OLA and/or an open lot without runoff controls.*
- d) *Conduct Level 2 or 3 land application inspections within a formally designated area such as a TMDL.*
- e) *Alternative strategy.*

#### *LOW RISK/LOW PRIORITY SITES*

- a) *Sites within a specified size category such as 300 – 499 AU or 500 – 999 AU.*
- b) *Sites within a watershed, township or other formally designated area.*
- c) *Conduct Level 2 or 3 land application inspections within a watershed, township or other formally designated area.*
- d) *Level 2 or 3 land application inspections as part of a compliance inspection or a Level 3 land application inspection conducted at non-NPDES sites >300 AU.*
- e) *Conduct inspections at all sites in the county on a five year or less rotating basis.*
- f) *Alternative strategy.*

### Inspection Strategies

Strategy Goal	Inspection Goal 2016*	Inspection Goal 2017*
<i>Sites that, according to previous inspections, have not been maintaining adequate land application records and/or manure management plans.</i>	2	2
<i>Sites that have an open lot without runoff controls.</i>	3	3
<i>Conduct inspections at all sites in the county on a five year or less rotating basis.</i>	2	2
<i>Inspect sites that are required to be registered that have never been inspected, with focus on open lots.</i>	3	3
<b>Total</b>	10	10

*\*Enter the number of inspections the County predicts will be completed for each category.  
Note: Numbers entered for Level 3 land application strategy goals must be quantified by feedlot sites and not individual farm fields.*

### Inspection Strategy Totals

	Inspection Goal 2016*	Inspection Goal 2017*
<b>Total</b>	30	30

*\*Enter the total inspections from both the Required Inspection Strategies and Inspection Strategies tables above.*

### Compliance Strategy

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.

A letter highlighting corrective actions will be sent to all non-compliant producers. If applicable, a MinnFARM analysis will also be included to define what issues were deemed non-compliant. Interim permits will be used with timelines to achieve corrective actions. Technical assistance to achieve the corrective actions will also be provided by staff.

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:

- a. Address non-compliance at the same time the facility non-compliance is addressed. See above.
- b. Include corrective actions in the inspection results notification letter, where corrective actions can be completed in 30 days or less.
- c. Issue an LOW or NOV that will include corrective actions and deadlines.
- 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 non-complaint land application inspection will result in either a letter being sent to the producer at the same time as the facility non-compliance or due to the seasonal timing of land application, the non-compliance will be dealt with through a separate mailing or in-person discussion.

- 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:
  - a. 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.
  - b. Decision to escalate compliance action where progress on corrective actions is not forthcoming.

The timeline will vary slightly depending on the responsiveness of the producer to correct the problem, the severity of the environmental threat, and the availability of cost-share assistance to correct the issue. Through this evaluation, Lyon County will develop a timeline to address each issue, taking into consideration that all non-compliances are unique. Interim permits, where applicable, will be used to guide producer from non-compliance to compliance in a set timeframe. The County will send follow-up letters within 30 days of discovery of the non-compliance.

**Owner Assistance Strategy**

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

Lyon County will promote the University of Minnesota Manure Utilization Workshops to producers along with Level II Manure Application Inspection as part of the inspection process. Technical outreach materials will also be distributed at the time of producer contact.

- 2. Please state the number of producers you expect will attend training and education activities if any are proposed.

We can expect roughly 25 producers per year to attend training, likely declining each year due to average producer age increases.

- 3. Will you be keeping track of the number of producer contacts? If so, how will it be tracked?

Lyon County documents producer contacts through the Ownership Assistance Program.

**B. Delegated County Minimum Program Requirements (MPRs)**

MN Stat. 116.0711 Subd. 2. (c) states that 25% of the total appropriation must be awarded according to the terms and conditions of the following MPRs.

### 1. Inspection MPR

A delegated County must inspect 7% or more of their State required registered feedlots annually, as determined by the table below, to be eligible for the Inspection MPR award. A feedlot inspection and/or a Level 2 or 3 land application inspection may only count once towards the 7% inspection rate. A second inspection done at the same site in the same year would be counted towards performance credits. At least half of the 7% inspections should be compliance (on site) inspections. The remaining half can be a combination of construction/Interim permit, Level 2 and Level 3 inspections.

Inspection MPRs	July 1 – Dec. 31, 2016	Jan. 1 –Dec 31 2017
1. <b>Agency-approved number required to be registered by the State.</b> <i>(Please enter the number that is shown for your County on the 2016 County Program Base Grant Award Schedule in Appendix B.)</i>	282	282
2. <b>County – Agency agreed upon inspection rate. (This is 7% for 2016 and 2017 unless otherwise negotiated.)</b>	20	20
3. <b>County – Agency agreed upon inspection number for the identified time period.</b>	20	20

### 2. Other MPRs

Registration MPRs	YES	NO
1. The County will register and maintain registration data in the Delta/Tempo database in accordance with MN R. Ch. 7020.0350 Subp. 1 and 7020.1600, Subp. 2. C.  <i>A County program review should indicate that the County uses the MPCA standard feedlot registration form or has been approved to use a County-designed registration form and updates Tempo with the registration information acquired from registration forms and/or permit applications. Tempo fields that must be updated continuously include shoreland status, DWSMA and OLA as agreed to by FMT-MACFO in 2013.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. The County issues a registration receipt to the feedlot owner within 30 days of receipt of the registration form. (7020.0350, Subp. 5.)  <i>A file review should indicate that the County has fulfilled the registration receipt requirement as stated in their registration work plan strategy.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Inspection MPRs	YES	NO
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.)  <i>A file review should indicate that the County uses and maintains on file inspection documentation in accordance with the above requirement.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(7020.1600, Subp. 2. H.) <i>A Delta/Tempo database query should indicate the entry of inspection data into Tempo occurs within required parameters.</i>		
5. The work plan contains an inspection strategy that has been approved by the agency. (7020.1600, Subp. 3a.B.(1-2)) <i>The Annual Inspection Strategy Progress report (located in the Supplemental Information Page section of the Annual County Feedlot Officer and Performance Credit Report) should indicate that the County initiated inspection plans and goals as stated in their inspection strategy.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Compliance MPRs</b>	<b>YES</b>	<b>NO</b>
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.)) <i>A file review should indicate that the County has notified the producers of compliance inspection results. Notification must be in writing either by letter or by a document and signed by the producer that he/she has viewed and agree with the completed inspection report and waives any further notification of results by mail.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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)). <i>A file review should indicate that in matters of non-compliance the County followed their compliance strategies.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
8. The County maintains documentation and correspondence for any return to compliance from a documented non-compliance status. (7020.1600, Subp. 2.H.) <i>When a County records a corrective action in Delta/Tempo the file should contain documentation by either the County or another party verifying that the corrective action was implemented and/or installed. (A separate inspection should be entered in Tempo to show return to compliance.)</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Permitting MPRs</b>	<b>YES</b>	<b>NO</b>
9. The County will issue permits within the 60/120 day time period according to Minn. Stat. 15.99. (7020.0505, Subp. 5.B.) <i>A file review should indicate that the County date stamps all application components and if applicable uses letters to notify producers of incomplete applications. An application component received by the county electronically (via e-mail) does not need a date stamp provided the dated e-mail is saved with the document.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10. The County will make sure all permit applications are complete. (7020.1600, Subp. 2.C.) <i>A file review should indicate that the County uses an agency approved application checklist and that applications are complete.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11. The County will ensure producer compliance with required notifications. (7020.2000, Subp. 4 and Subp. 5) <i>Public notifications for new or existing feedlots with a capacity of <math>\geq 500</math> AU proposing to construct or expand must include the following information:</i> a. Owner's names or legal name of the facility; b. Location of facility - county, township, section, and quarter section;	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<ul style="list-style-type: none"> <li>c. Species of livestock and total animal units;</li> <li>d. Types of confinement buildings, lots, and areas at the animal feedlot; and</li> <li>e. Types of manure storage areas</li> </ul> <p>Public notification is completed by equal or greater notification of one of the following:</p> <ul style="list-style-type: none"> <li>a. Newspaper (affidavit in file)</li> <li>b. Delivery by mail or in person; or</li> <li>c. As part of a county/township permitting process (CUP).</li> </ul>		
<p><b>12. Appropriate permit issuance after completion of required notifications. (7020.2000, Subp. 5)</b></p> <p><i>A file review should 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><b>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).</b></p> <p><i>A file review should indicate that a MMP and a MMP checklist completed by the County is on file for any Interim permit issued (for a site <math>\geq 100</math> AU); that a manure management checklist completed by the CFO is on file for any CSF permit issued for a feedlot with <math>\geq 300</math> AU where manure is non-transferred; and that 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><b>14. The County will ensure that a producer who submits a permit application that includes a liquid manure storage area (LMSA) meets the requirements in 7020.2100.</b></p> <p><i>A file review should indicate that the County uses an agency approved LMSA checklist and that plans and specifications are complete.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>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)</b></p> <p><i>A file review should indicate that the County issues Interim permits in appropriate situations and conducts an inspection prior to permit issuance.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Complaint Response MPR</b>	<b>YES</b>	<b>NO</b>
<p><b>16. The County maintains a record of all complaint correspondence. (7020.1600, Subp. 2.H. and Subp. 2.J.(6))</b></p> <p><i>The County maintains a complaint log and promptly reports to the MPCA any complaints that represent a possible health threat, a significant environmental impact or indicate a flagrant violation. The complaint log record includes the following information:</i></p> <ul style="list-style-type: none"> <li>a. Type of complaint</li> <li>b. Location of complaint</li> <li>c. Date and time complaint was made</li> <li>d. Facts and circumstances related to the complaint</li> <li>e. A statement describing the resolution of the complaint</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Owner Assistance MPR</b>	<b>YES</b>	<b>NO</b>



<p>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))</p> <p><i>The annual delegation review should indicate that the County initiated their plans in accordance with their owner assistance strategy.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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<b>Staffing Level and Training MPR</b>	<b>YES</b>	<b>NO</b>
<p>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.)</p> <p><i>The County should complete a minimum of 18 continuing education units (CEUs). Each unit consists of one hour of training related to MN Rules Ch. 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. (See Annual CFO Report Form Guidance document for more information about Training Performance credits.) All training sessions attended by the County must be submitted using the Supplementary Report Form.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Air Quality MPR</b>	<b>YES</b>	<b>NO</b>
<p>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.)</p> <p><i>The County should maintain a pumping notification log. 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>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

<b>Web Reporting Requirement</b>	<b>YES</b>	<b>NO</b>
<p>20. The County maintains an active website 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 Annual CFO Report and an MPCA financial report (yet to be determined) for the previous program year should be on the County's website.</i></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

## 2016 County Feedlot Program Delegation Agreement and Work Plan Review

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

None \_\_\_\_\_

**B. Agency Response to County Need Request**

\_\_\_\_\_

**C. Documentation of Work Plan Revisions and/or Alternate Methods for Meeting MPRs** Any work plan revisions including alternate methods for meeting MPRs that have been agreed to by both MPCA and the County must be documented in this space.

\_\_\_\_\_

**D. Work Plan Approval**

The 2016 delegation agreement and work plan has been reviewed and satisfactorily addresses delegation agreement requirements.

Yes  No

<p>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 County duties and goals by the MPCA and the County for the January 1 – December 31, 2016 period has been achieved.</p>	<p><i>John Birn</i> (County Feedlot Officer)</p>
	<p><i>John Birn</i> <span style="float: right;">12-17-15</span> (Signature of County Feedlot Officer) <span style="float: right;">(Date)</span></p>
	<p>(MPCA Regional Staff)</p>
	<p>(Signature of MPCA Regional Staff) <span style="float: right;">(Date)</span></p>
	<p>(MPCA County Development Lead)</p>
	<p>(Signature of MPCA County Development Lead) <span style="float: right;">(Date)</span></p>

Amendment: \_\_\_\_\_

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## 2017 County Feedlot Program Delegation Agreement and Work Plan Review

**D. County Need Requests** Please state any specific resources that you are requesting the MPCA provide to help administer the County feedlot program in your County.

None \_\_\_\_\_

**E. Agency Response to County Need Request**

\_\_\_\_\_



**F. Documentation of Work Plan Revisions and/or Alternate Methods for Meeting MPRs** Any work plan revisions including alternate methods for meeting MPRs that have been agreed to by both MPCA and the County must be documented in this space.

\_\_\_\_\_

**E. Work Plan Approval**

The 2017 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 County duties and goals by the MPCA and the County for the January 1 – December 31, 2017 period has been achieved.	 (County Feedlot Officer)	
	 (Signature of County Feedlot Officer)	12-17-15 (Date)
	_____ (MPCA Regional Staff)	
	_____ (Signature of MPCA Regional Staff)	_____ (Date)
	_____ (MPCA County Development Lead)	
	_____ (Signature of MPCA County Development Lead)	_____ (Date)

Amendment: \_\_\_\_\_

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## 2016 – 2017 Work Plan Inspection Strategy Guidance

The Inspection Strategy section of the work plan has been changed for 2016-2017. We have provided this guidance to ensure that Counties understand the work plan inspection strategy and can prepare inspection goals in line with applicable requirements.

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.

### Changes to the work plan inspection strategy for 2016 – 2017:

1. The production site and land application site inspection strategies have been combined.
  - 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 1 land application review.
  - Land application inspection. Three types of land application inspections can be conducted - Level 1, Level 2 and Level 3. Remember that all full compliance inspections includes a Level 1 land application inspection as applicable to the site. The non-NPDES inspection checklist must be used to document land application inspection results and the results must be entered into Tempo. None of the three types of land application inspections on their own meet the definition of a compliance inspection. However, Level 2 and Level 3 land application inspections will count towards the 7% inspection rate (Level 2 as 1.0 inspection and Level 3 as ½ of an inspection). Credit for a Level 2 land application inspection will be given only if there are records available and if those records are sufficient to meet the Level I inspection requirement.
2. The production site inspection component has four mandatory inspection strategy requirements:
  - Sites proposing construction or expansion.
  - Sites receiving an Interim or Construction Short Form (CSF) permit. A CSF permit applies to sites with  $\geq 300$  AU.
  - Sites with signed open lot agreements (OLAs) that have never been inspected.
  - Sites required to be registered that have never been inspected.
3. Compliance and construction inspections conducted at sites required to be State registered count toward the 7% inspection rate. A Level 2 land application inspection does count toward the 7% inspection rate as 1.0 inspection. A Level 3 land application inspection does count towards the 7% inspection rate as 0.5 inspections.
4. The County must write an annual inspection strategy progress report. The inspection strategy progress report is included in the Supplemental Information Page 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 site 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 been inspected or feedlots with OLAs that have not been inspected.

### **Recommended approach for developing inspection goals**

**Step 1.** The first step is to calculate the number of feedlots that the County intends to inspect annually. The County needs to set a goal of inspecting at least 7% of the total number of feedlots required to be registered in the County. Given this formula, a County with 300 feedlots would need to conduct 21 compliance inspections or a combination of 21 compliance, construction, Level 2 or Level 3 inspections annually. Two Level 3 land application inspections are needed to be counted as 1.0 compliance or construction inspection.

**Step 2.** The second step is to calculate the number of sites in the county that are subject to the four required inspection strategy categories (see Item 2 above). 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 is 75.

**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 used, the County has determined that they will do a total of 21 inspections annually (see Step 1) and that 15 of them will be due to permit issuances (Step 2). This leaves six 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 four required inspection strategy categories, is less than 7% 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 as high risk/priority or low risk/priority) whereby the County will be assured of meeting the 7% minimum inspection requirement.

## FY 2016 County Program Base Grant Award Schedule

July 1, 2015 - June 30, 2016

**\$1,959,000 Appropriation**

1. The funding rate for 2016 is \$68.72/feedlot for Part B and \$30.17 for Part C.
2. Data from the January 1, 2014 Registration Update is used for the Feedlots Eligible-for-Funding column.
3. Eight counties receive the minimum funding of \$7,500 as provided by statute.

Delegated County	Feedlots Eligible for Funding	Part B. Base Grant Award	County Match Requirement	Part C. MPR Award	Total Award
Big Stone	40	\$7,500	\$5,250		\$7,500
Blue Earth	363	\$24,945	\$24,945	\$10,952	\$35,897
Brown	386	\$26,526	\$26,526	\$11,646	\$38,172
Carver	238	\$16,355	\$16,355	\$7,180	\$23,536
Clay	105	\$7,216	\$7,216	\$3,168	\$10,383
Cottonwood	257	\$17,661	\$17,661	\$7,754	\$25,415
Dakota	161	\$11,064	\$11,064	\$4,857	\$15,921
Dodge	237	\$16,287	\$16,287	\$7,150	\$23,437
Douglas	420	\$28,862	\$28,862	\$12,671	\$41,534
Faribault	362	\$24,877	\$24,877	\$10,922	\$35,798
Fillmore	737	\$50,647	\$50,647	\$22,235	\$72,882
Freeborn	285	\$19,585	\$19,585	\$8,598	\$28,184
Goodhue	685	\$47,073	\$47,073	\$20,666	\$67,740
Houston	414	\$28,450	\$28,450	\$12,490	\$40,940
Jackson	330	\$22,678	\$22,678	\$9,956	\$32,634
Kandiyohi	445	\$30,580	\$30,580	\$13,426	\$44,006
Kittson	18	\$7,500	\$5,250		\$7,500
Lac Qui Parle	194	\$13,332	\$13,332	\$5,853	\$19,185
Lake of the Woods	25	\$7,500	\$5,250		\$7,500
Le Sueur	172	\$11,820	\$11,820	\$5,189	\$17,009
Lincoln	414	\$28,450	\$28,450	\$12,490	\$40,940
Lyon	282	\$19,379	\$19,379	\$8,508	\$27,887
McLeod	329	\$22,609	\$22,609	\$9,926	\$32,535
Marshall	41	\$7,500	\$5,250		\$7,500
Martin	474	\$32,573	\$32,573	\$14,301	\$46,874
Meeker	253	\$17,386	\$17,386	\$7,633	\$25,019
Morrison	618	\$42,469	\$42,469	\$18,645	\$61,114
Mower	381	\$26,182	\$26,182	\$11,495	\$37,677
Murray	425	\$29,206	\$29,206	\$12,822	\$42,028
Nicollet	316	\$21,716	\$21,716	\$9,534	\$31,249
Nobles	432	\$29,687	\$29,687	\$13,033	\$42,720
Norman	45	\$7,500	\$5,250		\$7,500
Otter Tail	0	\$0	\$0	\$0	\$0
Pennington	38	\$7,500	\$5,250		\$7,500

Pipestone	451	\$30,993	\$30,993	\$13,607	\$44,599
Polk	77	\$5,291	\$5,291	\$2,323	\$7,615
Pope	294	\$20,204	\$20,204	\$8,870	\$29,074
Red Lake	<b>38</b>	<b>\$7,500</b>	\$5,250		\$7,500
Renville	288	\$19,791	\$19,791	\$8,689	\$28,480
Rice	287	\$19,723	\$19,723	\$8,659	\$28,381
Rock	512	\$35,185	\$35,185	\$15,447	\$50,632
Sibley	289	\$19,860	\$19,860	\$8,719	\$28,579
	1,49				
Stearns	1	\$102,462	\$102,462	\$44,983	\$147,445
Steele	251	\$17,249	\$17,249	\$7,573	\$24,821
Stevens	130	\$8,934	\$8,934	\$3,922	\$12,856
Swift	157	\$10,789	\$10,789	\$4,737	\$15,526
Todd	682	\$46,867	\$46,867	\$20,576	\$67,443
Traverse	<b>34</b>	<b>\$7,500</b>	\$5,250		\$7,500
Wadena	99	\$6,803	\$6,803	\$2,987	\$9,790
Waseca	234	\$16,080	\$16,080	\$7,060	\$23,140
Watonwan	184	\$12,644	\$12,644	\$5,551	\$18,196
Winona	555	\$38,140	\$38,140	\$16,744	\$54,884
Wright	263	\$18,073	\$18,073	\$7,935	\$26,008
Yellow Medicine	271	\$18,623	\$18,623	\$8,176	\$26,799
<b>TOTAL</b>	<b>16,509</b>	<b>\$1,175,326</b>	<b>\$1,157,326</b>	<b>\$489,659</b>	<b>\$1,664,985</b>