



Agency of Agriculture, Food & Markets
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February 21, 2012

Deborah Markowitz, Secretary
Vermont Agency of Natural Resources
103 South Main Street
Center Building
Waterbury, Vermont 05671-0301

Dear Secretary Markowitz,

Enclosed please find the 2011 Annual Report for the Agricultural Water Quality Enforcement Program, submitted in accordance with the Agricultural Nonpoint Source Pollution Reduction Program Memorandum of Understanding, entered into by the Agency of Natural Resources, Department of Environmental Conservation and the Agency of Agriculture on April 16, 1993.

Please note that this is a comprehensive enforcement report that includes not only inspections conducted to determine compliance with the Accepted Agricultural Practices Regulations, but also inspections on Medium and Large Farm Operations and the enforcement actions issued for violations of MFO and LFO permits.

If you have any questions or concerns regarding this report, please feel free to contact Wendy Anderson of my staff at (802) 828-3475.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles R. Ross, Jr.", written over a horizontal line.

Charles R. Ross, Jr., Secretary
Vermont Agency of Agriculture, Food and Markets

cc: David Mears, Commissioner
Department of Environmental Conservation

Peter LaFlamme, Director
VT DEC Water Quality Division



Vermont Agency of Agriculture, Food and Markets Agricultural Water Quality Enforcement Program

Accepted Agricultural Practices Regulations Enforcement
Medium Farm Operation General Permit Enforcement
Large Farm Operation Individual Permit Enforcement

2011

February 13, 2012

Dear Reader,

The Vermont Agency of Agriculture, Food and Markets has developed a comprehensive approach to the regulation of farms in the state in order to best protect water resources. The development of a three-tiered approach to the regulation of Vermont farms allows for a logical progression in regulatory oversight as a farm grows in size from a small farm subject to regulation under the Accepted Agricultural Practices Regulations, to a Medium Farm Operation (MFO) regulated under the state's Medium Farm Operation General Permit to a Large Farm Operation (LFO) regulated under an individual LFO permit.

Accepted Agricultural Practices (AAPs) are the foundation of Vermont's Agricultural Nonpoint Source Water Quality Program. AAPs are a group of farmland management activities that are designed to conserve and protect natural resources by reducing nonpoint source pollutants such as sediments, nutrients and agricultural chemicals that can enter water resources and degrade water quality. All agricultural operators are required to conduct their farming activities in compliance with the AAPs, even medium and large farms operating under permits. The AAPs can be found at <http://www.vermontagriculture.com/ARMES/awq/AAPs.htm>.

The Medium Farm Operations (MFO) program allows medium sized farms to seek coverage under a single Vermont state **General Permit**. The General Permit prohibits discharges of wastes from a farm's production area to waters of the state, requires adequate and satisfactory waste storage and requires manure, compost, and other wastes to be land applied according to a nutrient management plan. All dairies with 200-699 mature animals, whether milking or dry, qualify as a MFO. Other common MFOs include beef operations (300-999 cattle or cow/calf pairs), youngstock and heifer operations (300-999 youngstock or heifers), horse operations (150-499 horses), turkey operations (16,500-54,999 turkeys), and egg facilities (25,000-81,999 laying hens without a liquid manure handling system). Information on the Medium Farm Operation General Permit Program can be found at <http://www.vermontagriculture.com/ARMES/awq/MFO.html>.

The LFO Program is an **individual permitting process** for farms with more than 700 mature dairy cows (whether milking or dry), 1,000 beef cattle or cow/calf pairs, 1,000 youngstock or heifers, 500 horses, 55,000 turkeys, or 82,000 laying hens (without a liquid manure handling system). The LFO law prohibits discharges of wastes from a farm's production area to waters of the state, requires adequate and satisfactory waste storage, and requires the farm to land apply manure, compost, and other wastes according to a nutrient management plan. Unlike the MFO Program, LFO permits are individual to each farm and also regulate odor, noise, traffic,

insects, flies, and other pests. Information on the LFO Permit Program can be found at <http://www.vermontagriculture.com/ARMES/awq/LFO.html>. If you do not have access to the internet, contact the Agency at 802-828-2431 to obtain additional program information.

In 2011, the Agency performed a total of 756 inspections/visits to farms to determine compliance with the Accepted Agricultural Practices Regulations, the Medium Farm General Permit and Large Farm Operation individual permits and to offer technical assistance.

AAP Compliance: In 2011, a total of 412 visits were made to small farms. One hundred and thirty-nine (139) inspections were conducted to determine compliance with the AAPs. Sixty-one (61) or 44% of inspections were conducted in response to complaints from the public, and seventy-eight (78) or 56% of AAP inspections resulted from field staff or office-generated compliance checks, and includes two inspections conducted with the EPA to determine compliance with the Federal CAFO program requirements. It is interesting to note that while the MFO and LFO programs are inspection-based compliance programs, the AAP enforcement program has also, over the years, been shifting steadily towards more of an inspection-based program as opposed to being driven by complaints from the public. In addition to the 139 inspections conducted on small farms, 273 visits were made to small farms to provide them with education and technical assistance to help them comply with water quality requirements. (Agency staff conducted 49 visits to provide technical assistance to small farms, and 4 Agricultural Resource Specialists (ARSs), funded by the Agency through the Vermont Association of Conservation Districts, provided education and technical assistance to an additional 224 small farms.)

As a result of inspections conducted in 2011, seven (7) small farms have received formal enforcement actions. Five (5) farms received corrective action letters (CALs). Two farms received cease and desist orders (CDOs) while one of these farms also received an Assurance of Discontinuance (AOD) as a follow-up to the CDO. The final violation rate is 5.0%. The resulting AAP compliance rate of 95% includes 5 farms found in violation of the AAPs that made immediate corrections in the field in response to assistance from Agency staff. Three (3) cases have been referred to an Agricultural Resource Specialist for follow-up technical assistance, one case was referred for engineering assistance and in one case, a variance was issued to allow the farm to meet the regulatory intent of the AAPs. Five (5) cases are in continuation and require follow-up compliance checks in order to be closed. (For one of these cases, 3 different visits were conducted to the site. Table 5 labels each of these visits as "CON", but for purposes of tallying the number of cases in continuation, these 3 visits are considered as a single case.)

The low rate of confirmed violations in relation to the number of complaints received is often attributable to the public not being fully familiar with the AAP requirements. Many complaints have to do with odors associated with manure spreading and stacking, which is not addressed under the AAPs. In addition, many people feel that a farm must be out of compliance with the AAPs and be causing water quality impacts simply because the production area appears "unsightly". Hence the majority of complaints have to do with manure management either on the production area or on fields. Many people also call to complain that a farmer is spreading manure during the spreading ban, when the farmer is actually transporting manure to a field for stacking, which is an acceptable method of manure management during the ban. Another common complaint involves the access of livestock to water. Many members of the public feel that livestock should not be allowed access to surface water at all. However, under the AAPs, as long as the streambank is being maintained in its native state and not being excessively trampled (a defined crossing area is allowed), it is not a violation of AAPs.

As indicated in the attached investigation tracking summary table (Table 5), compliance check surveys were conducted to ensure compliance with the winter manure spreading ban. Each survey is logged as a single investigation, but each survey covers a number of farms in a given area. In 2011, 20 pre-winter spreading ban compliance checks covering approximately 161 farms were conducted to ensure that farmers were properly managing their manure, emptying their pits and getting ready for the winter spreading ban. Once the ban was in effect, forty (40) compliance checks were conducted to ensure that no manure spreading was occurring during the winter spreading ban. These checks covered approximately 281 farms. So, while only 60 inspections are logged for these compliance check efforts, a total of more than 440 farms were found to be in compliance at the time of these checks.

A number of violations reported as being solved in the field, as well as those receiving formal enforcement actions, involve landowners with small livestock operations that are not aware that the AAPs apply to their activities. The Agency is seeing more of these types of operations, possibly due to the current economic conditions and the desire of people to raise their own food. In these cases, the violator is educated as to the requirements of the AAPs and requested to correct the situation. In cases where the landowner is cooperative and eager to correct the situation, no formal enforcement action is taken. If it appears that the landowner is resistant to corrective action, a formal enforcement action is taken.

MFO General Permit Compliance: In 2011, a total of 235 visits were made to medium farm operations. In 2011, 29 inspections were conducted on medium farms to evaluate compliance with the state's MFO General Permit conditions. This number includes 2 inspections conducted with the Vermont Department of Environmental Conservation (DEC) and 3 inspections conducted with staff from the Region 1 Office of the Environmental Protection Agency (EPA). These joint inspections were conducted in order to check for compliance with both the state MFO General Permit and the Federal Concentrated Animal Feeding Operation (CAFO) program requirements. Agency staff also conducted 20 regulatory follow-up visits to farms that have received enforcement actions to evaluate the farm's progress in coming into compliance with the General Permit requirements. Fourteen (14) inspections of medium farms were conducted in response to complaints received. 177 visits to MFOs involved providing technical assistance to farmers in correcting potential violations identified through an inspection. The Agency will perform multiple technical assistance visits to ensure a farm moves steadily towards achieving full compliance. When a farmer is not showing a commitment to correct a potential violation, the Agency will pursue an enforcement action.

In 2011, 6 medium farms received formal enforcement actions. Three MFOs received corrective action letters. Three MFOs received administrative penalties. Of those farms receiving administrative penalties, one farm also received an assurance of discontinuance and one farm received two final orders imposing proposed penalties. Two MFOs made immediate corrections of violations in the field in response to assistance from Agency staff and did not receive formal enforcement actions. One MFO enforcement case initiated in 2011 and an unresolved MFO enforcement case initiated in 2010 were referred to the Attorney General's Office for enforcement. Three (3) cases are in continuation and will require follow-up compliance checks in order to be closed.

LFO Individual Permit Compliance: In 2011, a total of 109 visits were made to large farm operations. Agency staff conducted 60 inspections to evaluate a farm's compliance with their individual LFO permit. This number reflects an annual inspection made of each farm along with any follow-up visits necessary to confirm the correction of any issues noted during the annual inspection. Twelve (12) regulatory follow-up visits were conducted to evaluate progress on

addressing compliance issues identified through formal enforcement actions, and 31 visits were conducted to provide technical assistance. Six (6) visits were initiated in response to complaints received. **In 2011, one LFO received an administrative penalty and 2 final orders imposing proposed penalties, and in one case the issuance of a corrective action letter is pending.** One LFO took immediate action to correct a violation in response to assistance from Agency staff. One case was referred to the Agency of Natural Resources in accordance with the Memorandum of Understanding (MOU) between ANR and VAAF, and one case was referred to the Attorney General's Office for enforcement. One (1) case is in continuation and will require a follow-up compliance check in order to be closed.

Questions regarding the Vermont Agricultural Water Quality Enforcement Program or this report in general, can be directed to the Agency of Agriculture, Agricultural Resource Management Division at (802) 828-2431.

Table 1 summarizes the number of inspections conducted in 2011 to determine compliance of small farms with the Accepted Agricultural Practices Regulations, medium farms with the MFO General Permit, and large farms with their LFO Individual Permit.

Inspection Type	Number of Inspections
Accepted Agricultural Practices Regulations	
Response to Complaints	61 (44% of 139 inspections)
Compliance Checks	78 (56% of 139 inspections; includes 2 inspections with EPA.)
Technical Assistance	273
Total AAP visits	412
Medium Farm Operations General Permit	
Inspections	29 (including 2 inspections with VT DEC and 3 with EPA)
Regulatory Follow-Up	20
Technical Assistance Visits	177
Complaints	14 (5 complaints led to full inspections & are counted in the 29 inspections conducted)
Total MFO Visits	235
Large Farm Operation Individual Permit	
Inspections	60
Regulatory Follow-Up	12
Technical Assistance Visits	31
Complaints	6
Total LFO Visits	109
GRAND TOTAL	756

Table 2 illustrates the number of inspections conducted in each of Vermont’s watersheds and the enforcement actions taken. **NOTE:** This table only addresses the inspections conducted to determine compliance with the AAPs, and those inspections of MFOs and LFOs that either lead to the issuance of an enforcement action, or were undertaken in response to complaints from the public (these investigations are summarized in Table 5). A number of inspections, such as surveys for compliance with the winter manure spreading ban, encompass more than 1 watershed. Therefore, the number of investigations on a watershed basis will exceed the absolute number of inspections conducted. The enforcement action taken is paired with the designation “SFO” for small farm, “MFO” for medium farm, and “LFO” for large farm. In many cases, field agents address and correct issues in the field without the need for a written enforcement action. In 2011, eight (8) cases (5 SFOs, 2 MFOs, and 1 LFO) involved providing farmers with verbal warnings of violations and suggestions for immediate corrections in the field (these cases are indicated with “verbal”). In a number of cases corrective actions are in process, and are reported here as “continuing”, or “CON”.

Watershed / (watershed number on attached table)	Number of Investigations	Enforcement Actions, Verbal Warnings, Continuing Cases, Referrals
Battenkill (1)	7	Verbal/MFO
Poultney & Mettawee (2)	17	Referral-ARS/SFO
Otter Creek (3)	30	Referral-Engineering/SFO, AP and Final Orders 1&2/MFO, CAL/MFO, CON/LFO, CON/MFO
Lower Champlain (4)	3	
Upper Champlain (5)	24	CAL/MFO, CAL/SFO, CAL/SFO, AP/MFO, CON/SFO, CON/MFO, CAL/SFO, CON/MFO
Missisquoi (6)	21	Referral-ANR/LFO, CDO/SFO, Verbal/LFO, CON/LFO
Lamoille (7)	21	AP & AOD/MFO, CDO/SFO, CON/SFO, Verbal/MFO, Variance/SFO
Winooski (8)	18	CON/SFO, Verbal/SFO, CAL/MFO, Referral-ARS/SFO
White (9)	4	Verbal/SFO, CON/SFO
Ottawaquechee & Black (10)	2	Verbal/SFO, Verbal/SFO
Saxton, Williams & West (11)	3	
Deerfield (12)		
Lower Connecticut (13)	7	CAL/SFO
Waits & Wells (14)	4	
Passumpsic (15)	2	
Upper Connecticut (16)	3	CAL/SFO
Barton & Clyde (17)	21	AP and Final Orders 1&2/LFO, CON/SFO, Verbal/SFO, Referral-Att. Gen'l /LFO, Referral-Att. Gen'l/MFO, CAL (pending)/LFO

Key for Table 2 and Table 5 - AAP/ MFO / LFO Investigation Tracking Summary Table

AOD = Assurance of Discontinuance

AP = Administrative Penalty

CAL = Corrective Action Letter

CDO = Cease and Desist Order

CON = Case Continuing

LOW = Letter of Warning

PA = Case Permanently Abayed / Closed

Table 3 illustrates the general nature of complaints received and compliance checks conducted. Some inspections addressed more than one concern, so the numbers in this table will exceed the number of inspections conducted. The majority of complaints, as in past years, were related to manure. General concerns included proximity of manure spreading or stacking to surface water, wells or property boundaries, or runoff from stacked manure to water. This table also reflects inspections and regulatory follow-up visits on MFOs and LFOs (also detailed in Table 1).

Nature of Complaint / Subject of Compliance Check	# Complaints	# Compliance Checks
General AAP Requirement		
Carcass Disposal / Slaughter Waste	5	
Composting - Livestock		
Composting - Non-livestock		
Construction of Farm Structures	1	
Cropfield Runoff - Erosion	2	
Ditch Maintenance / Impacts to Water	2	
Enforcement Action Follow-up		6
Farmer Requests for Assistance		2
General AAP Compliance Check	7	5
Livestock Access to Water/Streambank Impacts	1	1
Livestock Pasturing Near Wells	2	
Manure Management – Production Area	17	1
Manure Management – Field Practices	15	
Manure - Spreading During Ban	9	63 (includes 20 pre-spreading ban checks)
Milkhouse Waste	2	
Silage Leachate / Waste Feed	1	
Vegetative Buffers	1	
MFO Permit Compliance – production area	1	7
MFO Permit Compliance – field practices	9	2
LFO Permit Compliance – production area		3
LFO Permit Compliance – field practices	6	3

Table 4 . Enforcement Actions issued by section of AAP Rules, MFO General Permit, and LFO Individual Permit. [Note - A number of enforcement actions address more than one AAP section or permit requirement, so numbers will exceed the total number of enforcement actions issued.]

AAP Section	# violations / enforcement actions
4.01 - Discharges	CAL (3), CDO (1), CDO/AOD (1), ARS Referral (2), Engineering Referral (1)
4.02 - Nutrient and Pesticide Storage	CAL (2), ARS Referral (1), Verbal (2), Continuing (3), Variance (1)
4.03 - Nutrient and Pesticide Application	CAL (1), Verbal (3)
4.04 - Soil Cultivation	
4.05 - Agricultural Waste Management	Continuing (1)
4.06 - Buffer Zones	
4.07 - Construction of Farm Structures	Verbal (1)
4.08 - Ground Water Quality	Continuing (1)
MFO General Permit	
Production Area Concerns / Manure Storage	AP (1), AP/AOD (1), CAL (2), AGO Referral (1)
Field Practices	CAL (1), AP/Final Order 1&2 (1), Continuing (3), Verbal (1)
Recordkeeping	
LFO Individual Permit	
Production Area Concerns / Manure Storage	ANR Referral (1), AGO Referral (1)
Field Practices	AP/Final Order 1&2 (1), CAL-pending (1), Continuing (2), Verbal (1)
Recordkeeping	

Table 5. AAP/MFO/LFO Enforcement Inspection Tracking Summary Table. This table tracks all inspections into alleged violations of AAPs; MFO and LFO inspections conducted in response to complaints; and, MFO and LFO inspections that led to enforcement actions. It does not track all MFO and LFO inspections conducted in 2011. Please see Table 1 for a total number of MFO and LFO inspections conducted in 2011. (*) indicates that no complaint was received. The visit was initiated by a Field Agent or Office staff, or the inspection as requested by the farmer. For manure spreading ban and pre-spreading ban compliance checks, the farm type is not specified as the inspection can cover more than one farm type.

#	Farm Type	Date Received	Site Visit	Basin	Nature of Complaint	Violation	Action	Date	Refer To
1	SFO	1/9/11	1/10/11	6	Manure mgmt – production area		Refer	1/10/11	ARS
2	SFO	(*)	1/11/11	6	Enforcement action follow-up		PA	1/11/11	
3	SFO	1/10/11	1/11/11	3	Manure - spreading during ban		PA	1/11/11	
4	SFO	1/14/11	1/19/11	3	General AAP compliance check		PA	1/19/11	
5		(*)	1/3/11	7	Spreading ban compliance check (13 farms)		PA	1/14/11	
6		(*)	1/4/11	17	Spreading ban compliance check (15 farms)		PA	1/14/11	
7		(*)	1/11/11	15	Spreading ban compliance check (12 farms)		PA	1/14/11	
8	SFO	1/20/11	1/24/11 2/8/11	10	Manure - spreading during ban	4.03(c)	PA	2/8/11	
9	MFO	(*)	10/15/10	7	MFO Permit Compliance - production area	MFO GP AOD	AP	2/10/11	
10		(*)	1/6/11	2	Spreading ban compliance check (6 farms)		PA	1/25/11	
11		(*)	1/7/11	2	Spreading ban compliance check (5 farms)		PA	1/25/11	
12		(*)	1/11/11	3	Spreading ban compliance check (12 farms)		PA	1/25/11	
13		(*)	1/19/11	3	Spreading ban compliance check (5 farms)		PA	1/25/11	
14	SFO	(*)	1/26/11	5	AAP compliance check		PA	1/26/11	
15		(*)	1/6/11	7	Spreading ban compliance check (6 farms)		PA	2/3/11	
16		(*)	1/7/11	5	Spreading ban compliance check (6 farms)		PA	2/3/11	
17		(*)	1/14/11	7	Spreading ban compliance check (4 farms)		PA	2/3/11	
18		(*)	1/19/11	5/6	Spreading ban compliance check (5 farms)		PA	2/3/11	
19		(*)	1/25/11	5	Spreading ban compliance check (8 farms)		PA	2/3/11	
20		(*)	1/26/11	5/6	Spreading ban compliance check (4 farms)		PA	2/3/11	
21	MFO	(*)	9/9/10	5	MFO permit compliance – production area	MFO GP	CAL	2/11/11	

#	Farm Type	Date Received	Site Visit	Basin	Nature of Complaint	Violation	Action	Date	Refer To
22	SFO	(*)	1/14/11	7	General AAP compliance check		PA	2/23/11	
23		(*)	2/4/11	2/3	Spreading ban compliance check (7 farms)		PA	2/23/11	
24	SFO	3/4/11	3/8/11	3	Manure - spreading during ban		PA	3/10/11	
25	SFO	(*)	3/8/11	3	Manure - spreading during ban		PA	3/10/11	
26		(*)	3/2/11	1/3	Spreading ban compliance check (10 farms)		PA	3/10/11	
27		(*)	3/4/11	2	Spreading ban compliance check (7 farms)		PA	3/10/11	
28	MFO	1/4/11	1/4/11	6	Manure - spreading during ban		PA	1/6/11	
29		(*)	2/9/11	6	Spreading ban compliance check (6 farms)		PA	3/10/11	
30		(*)	2/10/11	6	Spreading ban compliance check (3 farms)		PA	3/10/11	
31		(*)	2/14/11	7	Spreading ban compliance check (4 farms)		PA	3/10/11	
32		(*)	2/24/11	5	Spreading ban compliance check (5 farms)		PA	3/10/11	
33		(*)	2/25/11	7	Spreading ban compliance check (5 farms)		PA	3/10/11	
34	MFO	3/9/11	3/10/11	1	Manure - spreading during ban	4.03 (c) MFO GP	PA	3/11/11	
35	SFO	3/21/11	3/22/11 4/18/11	13	Manure - spreading during ban	4.01(b)	CAL	5/12/11	
36	LFO	3/22/11	3/23/11	17	LFO permit compliance – field practices		PA	3/23/11	
37		(*)	3/14/11	1	Spreading ban compliance check (8 farms)		PA	3/22/11	
38		(*)	3/15/11	2/3	Spreading ban compliance check (10 farms)		PA	3/22/11	
39		(*)	3/17/11	3/4	Spreading ban compliance check (8 farms)		PA	3/22/11	
40	SFO	3/23/11	3/24/11	8	Manure - spreading during ban		PA	7/6/11	
41	SFO	3/24/11	3/25/11	3	Manure – spreading during ban		PA	3/25/11	

#	Farm Type	Date Received	Site Visit	Basin	Nature of Complaint	Violation	Action	Date	Refer To
42	LFO	(*)	3/24/11	6	LFO permit compliance – production area	4.01(a) LFO Permit	Refer	3/25/11	ANR
43	MFO	(*)	3/21/11	6	AAP compliance check		PA	3/25/11	
44	SFO	(*)	3/23/11	5	AAP compliance check		PA	3/25/11	
45	SFO	(*)	3/22/11	5	Enforcement action follow-up		PA	3/25/11	
46	SFO	4/1/11	4/19/11	14	General AAP compliance check		PA	4/20/11	
47	LFO	(*)	2/17/11	17	LFO permit compliance - field practices	LFO Permit	AP Final Order 1 Final Order 2	5/5/11 6/22/11 9/13/11	
48	SFO	(*)	3/22/11	5	Manure mgmt – production area	4.01(b) 4.02(d)	CAL	5/17/11	
49	SFO	4/6/11	4/6/11	6	Manure mgmt – production area		PA	4/8/11	
50		(*)	3/25/11	1, 2, 3	Spreading ban compliance check (6 farms)		PA	4/5/11	
51		(*)	3/30/11	1,3	Spreading ban compliance check (8 farms)		PA	4/5/11	
52	SFO	3/31/11	3/31/11	5	Manure - spreading during ban	4.03(c)	CAL	4/18/11	
53	SFO	4/12/11	4/13/11 4/20/11	3	Milkhouse waste	4.01(b)	Refer	4/20/11	Engineering
54	SFO	4/11/11	4/12/11	5	Cropfield runoff - erosion		PA	4/12/11	
55	MFO	4/14/11	4/15/11	6	MFO permit compliance – field practices		PA	4/20/11	
56	SFO	4/20/11	4/20/11	6	Manure mgmt – production area	4.01(b)	CDO AOD	5/17/11 6/17/11	
57	MFO	(*)	3/29/11	5	MFO permit compliance – production area	MFO Permit	AP	5/3/11	
58	LFO	(*)	4/15/11	6	LFO permit compliance – production area		PA	8/19/11	
59	SFO	4/27/11	4/28/11 5/1/11	7	Manure mgmt – production area	4.01(b)	CDO	5/17/11	
60	SFO	4/28/11	5/2/11	11	Vegetative buffers		PA	5/4/11	
61	LFO	4/29/11	4/29/11	17	LFO permit compliance – field practices		PA	5/4/11	

#	Farm Type	Date Received	Site Visit	Basin	Nature of Complaint	Violation	Action	Date	Refer To
62	SFO	4/26/11	5/2/11	5	Carcass disposal	4.05(a)	CON		
63	SFO	5/3/11	5/4/11	6	Manure mgmt – field practices		PA	5/4/11	
64	SFO	(*)	3/25/11 4/29/11	8	Enforcement action follow-up	AOD 4.02(a)	CON		
65	LFO	5/4/11	5/11/11	6	LFO permit compliance – field practices	4.03(g) LFO Permit	PA	5/11/11	
66	SFO	(*)	4/27/11	17	Farmer request for assistance – manure mgmt - field practices		PA	5/5/11	
67	SFO	(*)	4/20/11	3	General AAP compliance check		PA	5/4/11	
68	SFO	5/6/11	5/13/11	16	Manure mgmt – field practices		PA	5/13/11	
69	SFO	5/5/11	5/9/11	11	Manure mgmt – production area (horse)		PA	5/9/11	
70	SFO	5/3/11	5/5/11	2	Manure mgmt – production area (horse)	4.01(b) 4.02(c)	Refer	5/17/11	ARS
71	MFO	5/11/11	5/13/11	5	Manure mgmt – production area Carcass disposal		PA	5/17/11	
72	SFO	5/17/11	5/18/11	3	Manure mgmt – field practices		PA	5/20/11	
73	SFO	5/16/11	5/17/11	13	Carcass disposal		PA	6/1/11	
74	SFO	5/18/11	5/20/11	8	Manure mgmt – field practices		PA	5/23/11	
75	MFO	5/18/11	5/19/11	5	MFO permit compliance – production area		PA	5/19/11	
76		(*)	3/21/11	13	Manure spreading ban compliance check (11 farms)		PA	4/20/11	
77		(*)	3/24/11	13	Manure spreading ban compliance check (14 farms)		PA	4/20/11	
78	SFO	5/31/11	6/1/11	16	Silage leachate / Waste feed	4.01(b)	CAL	8/19/11	
79	MFO	(*)	6/1/11	3	MFO permit compliance – field practices	AOD MFO GP	NOV Final Order -1 Final Order -2	6/1/11 7/7/11 8/8/11	
80	SFO	6/3/11	6/6/11	17	Manure mgmt – production area Carcass disposal		PA	6/10/11	

#	Farm Type	Date Received	Site Visit	Basin	Nature of Complaint	Violation	Action	Date	Refer To
81	SFO	6/2/11	6/7/11	7	Manure mgmt – production area	4.02(a)	CON		
82	SFO	4/26/11	4/27/11	13	Manure mgmt – field practices		PA	6/1/11	
83	SFO	6/6/11	6/7/11	17	Manure mgmt – production area	4.08(a), (b)	CON		
84	SFO	6/6/11	6/7/11	17	Manure mgmt – field practices		PA	6/10/11	
85	SFO	6/8/11	6/9/11	3	Manure mgmt – production area		PA	6/16/11	
86	LFO	(*)	5/16/11	3	LFO permit compliance – field practices	LFO Permit	CON		
87	MFO	6/22/11	6/22/11	7	MFO permit compliance – field practices	4.03(g)	PA	7/6/11	
88	SFO	6/23/11	6/27/11 8/9/11	8	Livestock pasturing near wells Manure mgmt – production area	4.03(g)	PA	8/9/11	
89	SFO	6/23/11	6/27/11	9	Manure mgmt – field practices	4.02(c)	PA	7/5/11	
90	SFO	6/17/11	6/20/11	3	General AAP Compliance check		PA	6/20/11	
91	SFO	6/17/11	6/28/11	10	Construction of farm structure	4.07(c)	PA	7/5/11	
92	SFO	6/28/11	6/29/11	2	Manure mgmt – field practices		PA	7/1/11	
93	MFO	(*)	6/15/11	8	MFO permit compliance – production area	MFO GP	CAL	9/28/11	
94	MFO	6/27/11	6/27/11	4	MFO permit compliance – field practices		PA	7/18/11	
95	SFO	6/17/11	6/17/11 6/23/11	8	Carcass disposal/slaughter waste		PA	6/23/11	
96	SFO	6/29/11	6/30/11	11	Manure mgmt – production area		PA	6/30/11	
97	SFO	(*)	6/15/11 6/17/11	13	Enforcement action follow-up		PA	7/5/11	
98	MFO	(*)	5/11/11 11/1/11	5	MFO permit compliance check – field practices	MFO GP	CON		
99	SFO	7/5/11	7/7/11	7	Manure mgmt – field practices		PA	7/7/11	
100	SFO	7/8/11	7/12/11	5	Manure mgmt – field practices	4.02(a)	CAL	7/27/11	
101	MFO	7/20/11	7/20/11	3	MFO permit compliance – field	7.07(a)	CAL	8/9/11	

#	Farm Type	Date Received	Site Visit	Basin	Nature of Complaint	Violation	Action	Date	Refer To
					practices				
102	SFO	7/26/11	7/28/11	1	General AAP compliance check		PA	8/9/11	
103	SFO	7/11/11	7/12/11 7/28/11 11/17/11	7	Manure mgmt – production area		PA	8/8/11	
104	SFO	7/12/11	7/18/11	5	Cropfield runoff - erosion		PA	7/29/11	
105	SFO	(*)	8/2/11 10/27/11	8	Livestock access to water / streambank impacts		PA	10/27/11	
106	SFO	8/2/11	8/8/11	8	General AAP compliance check		PA	8/8/11	
107	SFO	7/25/11	7/26/11	7	General AAP Compliance check		PA	8/3/11	
108	LFO	(*)	6/24/11	17	LFO permit compliance – field practices		PA	6/30/11	
109	SFO	8/4/11	8/5/11	8	Farmer requested AAP compliance check		PA	8/5/11	
110	MFO	8/8/11	8/9/11	3	MFO permit compliance – field practices		PA	8/9/11	
111	SFO	8/18/11	8/22/11	8	Livestock access to water /streambank impacts	4.01(c)	Refer	10/13/11	ARS
112	SFO	8/22/11	8/23/11	2	Manure mgmt – field practices		PA	10/4/11	
113	SFO	8/23/22	8/25/11	16	Manure mgmt - production area		PA	9/24/11	
114	SFO	(*)	8/8/11	8	Enforcement action follow-up	AOD	CON		
115	SFO	9/9/11	9/12/11 9/13/11	8	Livestock pasturing near well		PA	10/14/11	
116	SFO	9/17/11	9/21/11	13	Ditch maintenance		PA	10/4/11	
117	SFO	9/23/22	9/23/11	8	Manure mgmt – production area		PA	10/5/11	
118	SFO	10/7/11	10/10/11	17	Manure mgmt – field practices	4.02(a)	PA	11/3/11	
119	MFO	10/19/11	10/27/11	17	MFO permit compliance - field practices		PA	10/27/11	
120	SFO	10/25/11	10/26/11	5	Manure mgmt – production area		PA	10/26/11	
121	SFO	10/25/11	10/27/11	7	Manure mgmt – field practices	4.02(a)	Issue Variance	11/22/11	
122	MFO	10/25/11	10/27/11	7	MFO permit compliance – field		PA	10/27/11	

#	Farm Type	Date Received	Site Visit	Basin	Nature of Complaint	Violation	Action	Date	Refer To
					practices				
123	SFO	10/28/11	11/4/11	2	Manure mgmt – field practices		PA	11/28/11	
124	SFO	10/18/11	10/26/11	3	Ditch maintenance		PA	11/1/11	
125	SFO	10/26/11	10/28/11	2	General AAP compliance check		PA	11/1/11	
126	SFO	(*)	10/31/11	8	Enforcement action follow-up	AOD	CON		
127	LFO	10/31/11	11/1/11	17	LFO permit compliance – field practices	4.06(a)	CAL pending		
128	MFO	(*)	11/15/11	8	MFO permit compliance – production area		PA	11/15/11	
129	SFO	11/16/11	11/17/11	4	Milkhouse waste		PA	11/28/11	
130	MFO	(*)	10/5/11	6	MFO permit compliance – production area		PA	12/7/11	
131	MFO	11/17/11	11/17/11	5	MFO permit compliance – field practices	MFO GP	CON		
132	SFO	12/1/11	12/1/11	2	Manure mgmt – production area		PA	12/1/11	
133	LFO	(*)	11/18/11	17	LFO permit compliance – production area	LFO Permit	Refer	11/18/11	Att. Gen'l
134	MFO	(*)	11/18/11	17	MFO permit compliance – production area	MFO GP	Refer	11/18/11	Att. Gen'l
135	LFO	11/1/11	11/1/11	6	LFO Permit Compliance – field practices	LFO permit	CON		
136		(*)	8/24/11	2	Pre-spreading ban compliance check (6 farms)		PA	12/13/11	
137		(*)	9/20/11	1	Pre-spreading ban compliance check (8 farms)		PA	12/13/11	
138		(*)	9/27/11	3	Pre-spreading ban compliance check (12 farms)		PA	12/13/11	
139		(*)	9/29/11	3	Pre-spreading ban compliance check (7 farms)		PA	12/13/11	
140		(*)	10/11/11	3	Pre-spreading ban compliance check (7 farms)		PA	12/13/11	
141		(*)	10/14/11	2	Pre-spreading ban compliance check (5 farms)		PA	12/13/11	

#	Farm Type	Date Received	Site Visit	Basin	Nature of Complaint	Violation	Action	Date	Refer To
142		(*)	10/19/11	3	Pre-spreading ban compliance check (9 farms)		PA	12/13/11	
143		(*)	10/27/11	3	Pre-spreading ban compliance check (11 farms)		PA	12/13/11	
144		(*)	11/4/11	2	Pre-spreading ban compliance check (4 farms)		PA	12/13/11	
145		(*)	11/14/11	3	Pre-spreading ban compliance check (6 farms)		PA	12/13/11	
146		(*)	12/1/11	2	Pre-spreading ban compliance check (4 farms)		PA	12/13/11	
147		(*)	12/8/11	2	Pre-spreading ban compliance check (4 farms)		PA	12/13/11	
148	SFO	12/20/11	12/21/11	9	Manure mgmt – field practices	4.02(a)	CON		
149	MFO	12/16/11	12/19/11	6	LFO permit compliance – field practices		PA	12/27/11	
150	MFO	12/28/11	12/30/11	3	MFO permit compliance – field practices	4.02(a)	CON		
151		(*)	12/09/11	7	Pre-spreading ban compliance check (4 farms)		PA	12/30/11	
152		(*)	12/16/11	5	Spreading ban compliance check (4 farms)		PA	12/30/11	
153		(*)	12/22/11	7	Spreading ban compliance check (5farms)		PA	12/30/11	
154		(*)	12/27/11	5	Spreading ban compliance check (3 farms)		PA	12/30/11	
155		(*)	12/28/11	6	Spreading ban compliance check (6 farms)		PA	12/30/11	
156		(*)	12/29/11	5	Spreading ban compliance check (7 farms)		PA	12/30/11	
157		(*)	12/30/11	7	Spreading ban compliance check (3 farms)		PA	12/30/11	
158		(*)	12/15/11	8	Spreading ban compliance check (5 farms)		PA	12/30/11	
159		(*)	12/16/11	8	Spreading ban compliance check (6 farms)		PA	12/30/11	
160		(*)	12/20/11	7	Spreading ban compliance check (6 farms)		PA	12/30/11	
161		(*)	12/22/11	14	Spreading ban compliance check (12 farms)		PA	12/30/11	
162		(*)	12/23/11	8	Spreading ban compliance check (6 farms)		PA	12/30/11	
163		(*)	12/27/11	9/14	Spreading ban compliance check (12 farms)		PA	12/30/11	
164		(*)	12/28/11	9	Spreading ban compliance check (10 farms)		PA	12/30/11	
165		(*)	12/29/11	14/1	Spreading ban compliance check		PA	12/30/11	

#	Farm Type	Date Received	Site Visit	Basin	Nature of Complaint	Violation	Action	Date	Refer To
				5	(8 farms)				
166		(*)	11/29/11	17	Pre-spreading ban compliance check (14 farms)		PA	11/29/11	
167		(*)	12/1/11	6/17	Pre-spreading ban compliance check (9 farms)		PA	12/1/11	
168		(*)	12/2/11	7/17	Pre-spreading ban compliance check (9 farms)		PA	12/2/11	
169		(*)	12/5/11	17	Pre-spreading ban compliance check (11 farms)		PA	12/5/11	
170		(*)	12/8/11	17	Pre-spreading ban compliance check (6 farms)		PA	12/8/11	
171		(*)	12/12/11	7/17	Pre-spreading ban compliance check (10 farms)		PA	12/12/11	
172		(*)	12/14/11	6/17	Pre-spreading ban compliance check (12 farms)		PA	12/14/11	