

Agency Of Agriculture, Food & Markets 116 State Street Montpelier, VT 05620-2901 www.VermontAgriculture.com

March 11, 2013

Deborah Markowitz, Secretary Vermont Agency of Natural Resources 1 National Life Drive Davis 2 Montpelier, Vermont 05620-3901

Dear Secretary Markowitz,

Enclosed please find the 2012 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,

cc:

vorles R Des

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

David Mears, Commissioner Department of Environmental Conservation

> Peter LaFlamme, Director VT DEC Watershed Management Division

Representative Carolyn Partridge, Chair House Committee on Agriculture and Forest Products

Representative David Deen, Chair House Committee on Fish, Wildlife and Water Resources

Senator Robert Starr, Chair Senate Committee on Agriculture

Senator Robert Hartwell, Chair Senate Committee on Natural Resources and Energy



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

2012

Dear Reader,

March 11, 2013

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 <u>http://www.vermontagriculture.com/ARMES/awg/AAPs.htm.</u>

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 animal numbers that qualify as a MFO can be found in the MFO General Permit. The General Permit for Medium Farm Operations is required to be updated every five years. The latest revision was made available for official public comment on February 21, 2012 and 3 public hearings were held during the comment period. The official public comment period closed on April 3, 2012 and based on written comments received and the public hearings, additional revisions and responses to comments were made. The General Permit was issued effective on July 18, 2012. Information on the Medium Farm Operation General Permit Program can be found at

http://www.vermontagriculture.com/ARMES/awg/MFO.html.

The LFO Program is an **individual permitting process** for farms with more than 700 mature dairy cows (other animal numbers that qualify as a LFO can be found in the LFO Rule). 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 General Permit, LFO permits are individual to each farm and also regulate odor, noise, traffic, insects, files, and other pests. Information on the LFO Permit Program can be found at <u>http://www.vermontagriculture.com/ARMES/awg/LFO.html</u>.

If you do not have access to the internet, contact the Agency at 802-828-2431 to obtain additional program information.

1

In 2012, the Agency performed a total of 631 inspections/visits to farms to determine compliance with the Accepted Agricultural Practices Regulations, the Medium Farm Operation General Permit and the Large Farm Operation individual permits and to offer technical assistance. This number represents the efforts of five Field Agents that respond primarily to small farm compliance issues, three Medium Farm Operations Coordinators, one Large Farm Operations Coordinator, and four Agricultural Resource Specialists working through the Vermont Association of Conservation Districts (VACD) to provide farmers with technical assistance. The extensive technical assistance offered by the Agency's four Agricultural Engineers is not reported here, but will be included in next year's report.

<u>AAP Compliance</u>: In 2012, a total of 322 visits were made to small farms (SFO's). Of these, 128 inspections were conducted to determine compliance with the AAPs.

		Percent of total inspections
Total Number of SFO Visits	322	······································
Inspections in response to complaints from public	43	34%
Staff-initiated compliance checks	85	66%
Inspections conducted with VTDEC(*)		· · · · · · · · · · · · · · · · · · ·
Inspections conducted with USEPA(*)		<u> </u>
Technical Assistance Visits	194	· · · · · · · · · · · · · · · · · · ·

Table 1. Small Farm Operation Visits

(*) Inspections conducted in cooperation with VTDEC and USEPA evaluate a farm operation for compliance with the Federal Concentrated Animal Feeding Operation (CAFO) permit 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 128 inspections conducted on small farms, 194 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 18 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, provide education and technical assistance to an additional 176 small farms.)

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 2012, 23 pre-winter spreading ban compliance checks covering approximately 115 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, 40 compliance checks were conducted to ensure that no manure spreading was occurring during the winter spreading ban. These checks covered approximately 290 farms. So, while only 63 inspections are logged for these compliance check efforts before and during the ban, a total of more than 405 farms were found to be in compliance at the time of these checks.

As a result of inspections conducted in 2012, nine (9) small farms received formal enforcement actions.

Table 1a – Small Farm Operation Enforcement Actions

	Number of Cases
Corrective Action Letter (CAL)	7
Cease and Desist Order (CDO)	1
Assurance of Discontinuance (AOD)	· ·
Notice of Violation with Administrative Penalty (NOV)	1
SFO In-Field Corrections (no formal enforcement)	4
SFO Referrals	
Agricultural Resource Specialist (ARS)	1
Agency of Natural Resources (VT ANR) (*)	2
Agronomist	1
Attorney General's Office (AGO)	1(ongoing monitoring for a case referred in 2011)
SFO Cases in Continuance	4

(*) Under a Memorandum of Understanding with the VT Agency of Natural Resources, cases involving suspected direct discharges of waste to water are referred to ANR for investigation.

<u>MFO General Permit Compliance</u>: In 2012, a total of 240 visits were made to medium farm operations. Of these, 106 inspections were conducted on medium farms to evaluate compliance with the state's MFO General Permit conditions.

Table 2 – Medium Farm Operation Visits

Total Number of MFO Visits	240		
MFO Inspections in response to complaints from public	15		
MFO Compliance checks	61		
Inspections conducted with VTDEC(*)	5		
Inspections conducted with USEPA(*)	14		
MFO Regulatory Follow-up visits	30		
MFO Technical Assistance Visits	134	•	

(*) Inspections conducted in cooperation with VTDEC and USEPA evaluate a farm operation for compliance with the Federal Confined Animal Feeding Operation (CAFO) permit requirements in addition to the State MFO General Permit.

Thirty (30) regulatory follow-up visits were made to farms that have received enforcement actions to evaluate the farm's progress in coming into compliance with the General Permit requirements. One hundred and thirty four (134) visits to MFOs involved providing technical assistance to farmers that show interest and motivation to correct a potential violation identified through an inspection. The Agency will perform multiple technical assistance visits to ensure a farm moves steadily towards achieving compliance. When a farmer is not showing a commitment to correct a potential violation, the Agency will pursue an enforcement action.

As a result of compliance inspections conducted in 2012, five (5) medium farms received formal enforcement actions, and one (1) action is pending. An additional 50 MFO's received notices of violation with administrative penalties for failing to submit their MFO Annual Compliance Report as required by the MFO General Permit.

Table 2a – Medium Farm Operation Enforcement Actions

	Number of Cases
Corrective Action Letter (CAL)	3
Cease and Desist Order (CDO)	•
Assurance of Discontinuance (AOD)	1 (pending)
Notice of Violation with Administrative Penalty (NOV)	51

Final Order (FO)	1 (Case initiated in 2011)
MFO In-Field Corrections (no formal enforcement)	2
MFO Referrals	
Agricultural Resource Specialist (ARS)	
Agency of Natural Resources (VT ANR) (*)	2
Engineering Assistance (ENG)	
Attorney General's Office (AGO)	
MFO Cases in Continuance	2

<u>LFO Individual Permit Compliance</u>: In 2012, a total of 69 visits were made to large farm operations. Of these, 44 inspections were conducted to evaluate a farm's compliance with their individual LFO permit.

Table 3 – Large Farm Operation Visits

5	
31	
8	· · · ·
25	

(*) Inspections conducted in cooperation with VTDEC and USEPA evaluate a farm operation for compliance with the Federal Concentrated Animal Feeding Operation (CAFO) permit requirements in addition to the farm's LFO Permit.

As a result of compliance inspections conducted in 2012, three (3) large farms received formal enforcement actions.

Table 3a - Large Farm Operation Enforcement Actions

	Number of Cases
Corrective Action Letter (CAL)	
Cease and Desist Order (CDO)	
Assurance of Discontinuance (AOD)	
Notice of Violation with Administrative Penalty (NOV)	2
Letter of Warning (LOW)	1
LFO In-Field Corrections (no formal enforcement)	2
LFO Referrals	
Agricultural Resource Specialist (ARS)	
Agency of Natural Resources (VT ANR) (*)	
Engineering Assistance (ENG)	
Attorney General's Office (AGO)	1 (ongoing monitoring for a case referred in 2011)
LFO Cases in Continuance	1

Key for Tables 4, 6 and 7 AGO = Attorney General's Office AOD = Assurance of Discontinuance CAL = Corrective Action Letter CDO = Cease and Desist Order CON = Case Continuing LOW = Letter of Warning NOV = Notice of Violation

PA = Case Permanently Abayed / Closed

Table 4. Inspections and Enforcement Actions by Watershed

Watershed / (watershed number on attached table)	Number of Investigations	Enforcement Actions, Verbal Warnings, Continuing Cases, Referrals				
Battenkill (1)	7	NOV/MFO, Verbal/LFO				
Poultney & Mettawee (2)	9					
Otter Creek (3)	24	CON/LFO, Final Order/MFO, NOV/MFO (3), Verbal/SFO (2)				
Lower Champlain (4)	10	CON/MFO				
Upper Champlain (5)	18	AOD/MFO, CON/SFO, LOW/LFO, NOV/MFO (6), Verbal/MFO				
Missisquoi (6)	27	CAL/SFO (3), CDO/SFO, CON/MFO, NOV/LFO, NOV/SFO, NOV/MFO (8)				
Lamoille (7)	8	CAL/SFO, NOV/MFO (2)				
Winooski (8)	23	CAL/SFO, CAL/MFO (2), NOV/MFO (5), Verbal/SFO, Verbal/MFO				
White (9)	18	NOV/MFO (3), Verbal/SFO				
Ottauquechee & Black (10)	9					
Saxton, Williams & West (11)	7	NOV/MFO				
Deerfield (12)	1	· · · · · · · · · · · · · · · · · · ·				
Lower Connecticut (13)	20	CON/SFO (3), NOV/MFO (2)				
Waits & Wells (14)	11	CAL/SFO, NOV/MFO (3)				
Passumpsic (15)	4					
Upper Connecticut (16)	17	CAL/MFO, NOV/LFO, NOV/MFO (8)				
Barton & Clyde (17)	23	AGO/SFO, AGO/LFO, CAL/SFO, NOV/MFO (9), Verbal/LFO				

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 staff address and correct issues in the field without the need for a written enforcement action. In 2012, eight (8) cases (4 SFOs, 2 MFO, and 2 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".

Table 5. General Nature of Complaints Received and Compliance Checks Conducted. This table summarizes all compliance checks and 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 based on the inspections tracked in Table 7. It does not track all MFO and LFO inspections conducted in 2012. Some inspections addressed more than one concern, so the numbers in this table may 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.

Nature of Complaint / Subject of Compliance Check	# Complaints	# Compliance Checks
General AAP Requirement		
Carcass Disposal / Slaughter Waste	1	
Composting - Livestock	1	
Composting - Non-livestock	•	•
Construction of Farm Structures		1
Cropfield Runoff - Erosion	*	
Ditch Maintenance / impacts to Water	2	
Enforcement Action Follow-up		· .
Farmer Requests for Assistance	2	
General AAP Compliance Check	1	7
Livestock Access to Water/Streambank Impacts	5	1
Livestock Pasturing Near Wells	1	
Manure Management – Production Area	16	10
Manure Management – Field Practices	11	1
Manure Management - Spreading During Ban	3	2
Manure Management – Spreading Ban Compliance Check		40
Manure Management – Pre-spreading Ban Compliance Check (Nov. 1 – Dec. 15)		23
Milkhouse Waste		1
Silage Leachate / Waste Feed	· 1	2
Vegetative Buffers	1	
MFO Permit Compliance – Production Area	4	4
MFO Permit Compliance – Field Practices	10	1
MFO Permit Compliance – Recordkeeping/Reporting		1
MFO Permit Compliance – Enforcement Action Follow-up		1

6

LFO Permit Compliance – Production Area	2	3		
LFO Permit Compliance – Field Practices	2	3		
LFO Permit Compliance – Recordkeeping/Reporting				
LFO Permit Compliance - Enforcement Action Follow-up				
TOTAL	63	101		

•

÷

. •

ς.

.

Table 6 . Enforcement Actions issued by section of AAP Rules, MFO General Permit, and LFO Individual

Permit. [Note - an enforcement action may address more than one AAP section or permit requirement, so numbers may exceed the total number of enforcement actions issued.]

AAP Section	# violations / enforcement actions
4.01 - Discharges	10 / AGO (1), CAL (5), CDO (1), NOV (1), Verbal (2)
4.02 - Nutrient and Pesticide Storage	2 / CAL (2)
4.03 - Nutrient and Pesticide Application	2 / Verbal (2)
4.04 - Soil Cultivation	
4.05 - Agricultural Waste Management	
4.06 - Buffer Zones	1 / Verbal (1)
4.07 - Construction of Farm Structures	
4.08 - Ground Water Quality	
MFO General Permit	
Production Area Concerns / Manure Storage	4 / AOD (1), CAL (2), NOV (1), Verbal (1)
Field Practices	3 / Cal (1), Final Order (1), Verbal (1)
Recordkeeping	50 / NOV (50)
LFO Individual Permit	
Production Area Concerns / Manure Storage	2 / AGO (1), NOV (1)
Field Practices	3 / LOW (1), NOV (1), Verbal (1)
Recordkeeping	

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 7. AAP/MFO/LFO Enforcement Inspection Tracking Summary Table. This table tracks all compliance checks and 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. If there is no date under the "date received" column, no complaint was received. The visit was initiated by a Field Agent or Office staff, or the inspection as requested by the farmer. This Table does not track all MFO and LFO inspections conducted in 2012. Please see Tables 2 and 3 for a total number of MFO and LFO inspections conducted in 2012.

	Total Farms	Visited Basin	Farms Visited Basin		Date		Basin	Basin					P.4 -7-
Case #	Visited	#1	#2	Size	Color Street Str	Site Visit	ID #1	ID #2	Nature of Complaint	Violation	a support of the second	ALCONTROL 1	Refer To
1	1			SFO	1/13/2012	1/16/2012	2		Manure management - spreading during ban		PA PA	1/24/2012	
2	13	6	2	SFO		1/5/2012	8		Manure management - spreading ban compliance check				
3	4			SFO	100	1/6/2012	8		Manure management - spreading ban compliance check		PA	1/20/2012	
4	14	7	7	SFO		1/10/2012	14	16	Manure management - spreading ban compliance check		PA	1/20/2012	
5	8			SFO		1/10/2012	3		Manure management - spreading ban		PA	1/24/2012	
6	10	_		SFO	_	1/11/2012	4		compliance check Manure management - spreading ban		PA	1/24/2012	
7	6			SFO		1/13/2012	1		compliance check Manure management - spreading ban		PA	1/24/2012	
8	7			SFO		1/17/2012	2		compliance check Manure management - spreading ban		PA	1/24/2012	_
						TENTER SHOULD ST			compliance check			1/24/2012	
9	8			SFO		1/23/2012	2		Manure management - spreading ban compliance check		PA		
10	1			MFO	1/26/2012	1/30/2012	5		Manure management - spreading during ban		PA	2/2/2012	
11	1		_	SFO	1/27/2012	1/30/2012	3		Manure management - production area		PA	1/31/2012	
12	10			SFO		1/4/2012	17		Manure management - spreading ban compliance check		PA	1/27/2012	
13	11	5	6	SFO	3	1/5/2012	17	6	Manure management - spreading ban compliance check		PA	1/27/2012	
14	9			SFO		1/9/2012	17		Manure management - spreading ban compliance check		PA	1/27/2012	
15	- 8			SFO		1/15/2012	6		Manure management - spreading ban compliance check		PA	1/27/2012	
16	12			SFO		1/19/2012	16	17	Manure management - spreading ban		PA	1/27/2012	
10	12	0		SFU		1/19/2012	10	17	compliance check		ι <u>α</u>	1/2//2012	
17	1			SFO		2/1/2012	5		Manure management - production area		PA	2/1/2012	
18	6			SFO		1/26/2012	2		Manure management - spreading ban compliance check		PA	2/3/2012	
19	5	*		SFO		1/31/2012	3		Manure management - spreading ban compliance check		PA	2/3/2012	
20	1	_	_	SFO	2/8/2012	2/10/2012	6	-	Manure management - production area	4.01(b)	CAL	4/9/2012	
21	1			SFO	2/14/2012	2/15/2012	3		Composting - livestock	10.107	PA	2/21/2012	
22	1			LFO		2/26/2012	17	_	Manure management - spreading during ban		PA -	2/16/2012	
23	1			SFO	2/17/2012	2/22/2012	15		Manure management - production area		PA	6/28/2012	
24	1			SFO		2/27/2012 3/23/2012	1		General AAP compliance check		PA	3/23/2012	
25	5	3	2	SFO		2/15/2012	4		Manure management - spreading ban compliance check		PA	2/21/2012	
26				SFO	2/27/2012	2/28/2012			Manure management – production area		PA	3/9/2012	
27	1			LFO		5/11/2012	17		LFO permit compliance – production area	LFO Permit	AGO		
28	1			SFO		6/4/2012	17		Silage leachate	4.01(a)	AGO		
29	1	_		SFO	3/5/2012	3/8/2012	3			4.03(c)	PA	3/8/2012	
30 31	12			SFO SFO		2/19/2012 2/22/2012	3		Manure management - spreading during ban Manure management - spreading ban compliance check	4.03(c)	PA PA	3/8/2012 3/8/2012	a
32	7	3	4	SFO		2/29/2012	1	2	Manure management - spreading ban		РА	3/8/2012	
33	6		-	SFO		1/13/2012	8		compliance check Manure management - spreading ban		PA	3/12/2012	
34	6			SFO		1/17/2012	8		compliance check Manure management - spreading ban		РА	3/12/2012	
35	5			SFO		2/2/2012	8		compliance check Manure management - spreading ban		PA	3/12/2012	
36	6			SFO		2/15/2012	15		compliance check Manure management - spreading ban		PA	3/12/2012	
37		_		SFO	_	3/22/2012	7	_	compliance check Manure management - production area		PA	3/22/2012	
38	1		<u> </u>	SFO	3/9/2012	3/13/2012	6		Manure management - field practices	4.02(c)	CAL	3/20/2012	
50	1			57.50 L		4/24/2012	8		A CONTRACTOR AND A CONTRACT	0.000	E.34722	10000000000	
39	1			SFO.	3/19/2012	3/21/2012	7		Manure management - field practices		PA	3/30/2012	
41	4	2	2	SFO		3/12/2012	1	3	Manure management - spreading ban		PA	3/21/2012	
			. Ű						compliance check				

	Total Farms	Farms Visited Basin	Visited Basin	Farm	and a second sec	D14 114 14	Basin	Basin					
ase #	Visited		#2	Size	Received	Site Visit 3/13/2012	ID #1	1D #2	Nature of Complaint	Violation	 Colorine and all 	No. of the local	Refer To
	· · ·			310		3/13/2012	1		Manure management - spreading ban compliance check		PA	3/13/2012	
43	10			SFO		3/15/2012	3		Manure management - spreading ban	<u> </u>	PA	3/21/2012	
44	1			LFO		3/22/2012	17		compliance check LFO permit compliance - field practices	LFO	PA	4/21/2012	
	· · · ·			LI.0.		5122(2012)	17		EPO permit compliance + new practices	Permit	PA	4/21/2012	
45	1			SFO	3/22/2012	3/28/2012	6		Manure management - field practices		PA	3/28/2012	
46	1			SFO	4/2/2012	4/9/2012	7		Manure management - production area	4.02(a) and	CAL	4/12/2012	
		-								and variance			
47	1			MFO	4/3/2012	4/6/2012	3		MFO permit compliance - field practices		PA	4/6/2012	
48	8			SFO MFO	10020012	3/28/2012 4/11/2012	2	_	General AAP compliance check	LEO OD	PA	4/3/2012	
	i			aro	409/2012	4/24/2012	3		MFO permit compliance - field practices	MFO GP Buffers	PA	5/30/2012	
50	1			SFO		4/28/2012	2		Manure management - production area		PA	4/28/2012	Agronomist
51	4	2	2	SFO		3/12/2012	10		Manure management - spreading ban		PA	4/9/2012	
52	3	2	- 1	SFO		3/15/2012	16		compliance check Manure management - spreading ban		PA	4/9/2012	
-2.7	1			anaz I		THECOTIONS			compliance check		1.00	W.C.S.M.A.S.	
53	-			SFO		20/20010	10					100 00 0 0 0	
33	1	4	4	or0		3/16/2012	10	9	Manure management - spreading ban compliance check		PA.	4/9/2012	
54	5			SFO		3/21/2012	13		Manure management - pre-spreading ban		PA	4/9/2012	
				CILC.					compliance check	ļ			
55	3			SFO		3/22/2012	10		Manure management - pre-spreading ban compliance check		PA	4/9/2012	
56	5	3	2	SFO		3/23/2012	13		Manure management - pre-spreading ban		PA	4/9/2012	
_									compliance check		1 × ~ ~	1.000	
57	⊗ 2			SFO		3/28/2012	11		Manure management - pre-spreading ban compliance check		PA	4/9/2012	
58	3		-	SFO		3/29/2012	10		Manure management - pre-spreading ban	2	PA	4/9/2012	
	- 1								compliance check				
59	2			SFO		3/30/2012	13		Manure management - pre-spreading ban		PA	4/9/2012	
60	4			SFO		4/6/2012	13		compliance check Manure management - pre-spreading ban		PA.	4/9/2012	
						=	3.5.		compliance check	æ.	149). 		
61				SFO SFO	4/24/2012	4/26/2012	17		Livestock pasturing near wells		PA	6/22/2012	
02	- 1			510	4/23/2012	4/24/2012	14		Livestock access to water / streambank issues	4.01(c) & (d)	CAL	4/27/2012	
63	1			SFO		5/18/2012	3		Manure management - production area	(6)	PA	6/12/2012	
64	1			SFO		4/26/2012	3		Livestock access to water / streambank issues		PA	6/12/2012	
65	- 1			SFO	4/26/2012	4/27/2012	8	-	Manure management - production area		PA	5/2/2012	_
66	1			SFO	and the second se		8		Manure management – production area		PA	5/2/2012	
67	1			SFO		5/16/2012	3		Milkhouse waste		PA	6/12/2012	
68	i 4 .			SFO	5/8/2012	5/10/2012	6		Manure management - production area		PA	5/10/2012	
69	1		1	MFO		5/8/2012	5		MFO enforcement action follow-up		PA	5/11/2012	
70	1			SFO	5/9/2012	5/9/2012	17		Manure management - production area	4.01 (b)	CAL	6/6/2012	
71	1	-		SFO	5/7/2012 5/15/2012	5/9/2012	17		MFO permit compliance - field practices		PA	5/9/2012	
73	1			MFO	5/13/2012	5/18/2012	6		Ditch maintenance / impacts to water MFO permit compliance – field practices	_	PA CON	5/18/2012	
74	1			SFO	5/14/2012	5/18/2012	17		Manure management - production area		PA	6/22/2012	
75	<u>a</u>		1	FO	5/22/2012	5/23/2012	<u>_</u> 1	1	LFO permit compliance - field practices	4.01(a)	PA	5/23/2012	
76	1	-		MFO	5/23/2012	9/11/2012	3		MEQ normit compliance - field practices		DA	0010012	
77	1			FO	5/25/2012	6/4/2012	8		MFO permit compliance – field practices Farmer request for assistance		PA PA	9/11/2012 7/27/2012	
_													
78 79	1	-		AFO FO	5/30/2012 6/5/2012	5/30/2012 6/8/2012	6		MFO permit compliance – field practices		PA	5/30/2012	
80	- 4			FO	5/29/2012	5/30/2012	6		FO permit compliance – field practices Livestock access to water / streambank issues		PA PA	6/11/2012 7/6/2012	
				2004					and a second			17306454364	
81 82	1			FO	6/11/2012	6/18/2012	9		Manure management - production area		PA	8/3/2012	
82	1			FO	6/12/2012 5/31/2012	6/13/2012 6/5/2012	3		Ditch maintenance / impacts to water Manure management - production area		PA PA	6/13/2012	
84	1			FO	6/7/2012	6/7/2012	3		Manure management - field practices		PA	6/7/2012	
85	1		N	dFO	6/14/2012	6/15/2012	5		MFO permit compliance - production area		PA	6/15/2012	
86			7	FO	6/18/2012 r	iona	6		EQ nermit compliance field and in		DA	7/18/2012	
1214			1		W10/40121	0410	0	ľ	FO permit compliance - field practices		PA	7/18/2012	

	Farms 1	Basin	Visited Basin		Date		Basin	Basin			ilin.	n a star	Decom
	Visited	#1	#2	Size	Received	Site Visit	1D #1	1D #2	Nature of Complaint	Violation	Action PA	Date 8/3/2012	Refer To
87	4			SFO	6/15/2012	6/18/2012 6/20/2012	2		Manure management – production area		C73		
88	3			SFO	6/21/2012	6/26/2012	14		Livestock access to water / streambank issues		PA	6/26/2012	
89	1			SFO		6/27/2012	6		Manure management - production area	4.01(b)	CDO	8/31/2012	ANR
90	i			SFO	3/13/2012	3/14/2012	5		Manure management - field practices		PA	10/1/2012	
		- 1				6/27/2012 9/28/2012							
91	1	-		MFO	7/3/2012		15		Manure management - field practices		PA	7/5/2012	
						7/5/2012			1.47.05	MEO	NOV	7/17/2012	
92	1			MFO			13		MFO permit compliance – recordkeeping/reporting	MFO Permit	NUN	11112012	
93	1			MFO			9		MFO permit compliance -	MFO	NOV	7/17/2012	
94	1		1	MFO			8		recordkeeping/reporting MFO permit compliance -	Permit MFO	NOV	7/17/2012	
24									recordkeeping/reporting	Permit	an 04 A		
95	<u>)</u> 1			MFO			13		MFO permit compliance – recordkeeping/reporting	MFO Permit	NOV	7/17/2012	
96	1	_		MFO			7		MFO permit compliance -	MFO	NOV	7/17/2012	
	25								recordkeeping/reporting	Permit	-		
97	1			MFO			6		MFO permit compliance – recordkeeping/reporting	MFO Permit	NOV	7/17/2012	
98	1	-	-	MFO	_)	8		MFO permit compliance -	MFO	NOV	7/17/2012	
				100					recordkeeping/reporting	Permit MFO	NOV	7/17/2012	
99	1/1			MFO			3		MFO permit compliance – recordkeeping/reporting	Permit	INC) V	1/1//2012	
100	1			MFO			Ц		MFO permit compliance -	MFO	NOV	7/17/2012	
101	1			MFO			17		recordkeeping/reporting MFO permit compliance	Permit MFO	NOV	7/17/2012	_
101	ೆ			in o			- M		recordkeeping/reporting	Permit	2002		
102	1			MFO			14		MFO permit compliance – recordkeeping/reporting	MFO Permit	NOV	7/17/2012	
103	1			MFO	_	1	14	-	MFO permit compliance -	MFO	NOV	7/17/2012	
									recordkeeping/reporting	Permit			
104	1			MFO			17	1	MFO permit compliance – recordkeeping/reporting	MFO Permit	NOV	7/17/2012	
105	1			MFO			3		MFO permit compliance -	MFO	NOV	7/17/2012	
106		<u> </u>		MFO					recordkeeping/reporting MFO permit compliance -	Permit MFO	NOV	7/17/2012	
100				INITO:					recordkeeping/reporting	Permit		77172012	
107	1			MFO			6		MFO permit compliance -	MFO Permit	NOV	7/17/2012	
108	1	-		MEO			7		recordkeeping/reporting MFO permit compliance -	MFO	NOV	7/17/2012	
1									recordkeeping/reporting	Permit			
109	el.			MFO			17		MFO permit compliance – recordkeeping/reporting	MFO Permit	NOV	7/17/2012	
110	- 1			MFO			17		MFO permit compliance -	MFO	NOV	7/17/2012	
111				MFO			17		recordkeeping/reporting MFO permit compliance -	Permit MFO	NOV	7/17/2012	
3.13				aro					recordkeeping/reporting	Permit	01125A		
112	1			MFO			17		MFO permit compliance -	MFO Permit	NOV	7/17/2012	1
113	1			MFO			5		recordkeeping/reporting MFO permit compliance -	MFO	NOV	7/17/2012	n
									recordkeeping/reporting	Permit			
114	1		24	MFO			9		MFO permit compliance - recordkeeping/reporting	MFO Permit	NOV	7/17/2012	
115	1			MFO			8		MFO permit compliance -	MFO	NOV	7/17/2012	
172				100					recordkeeping/reporting MFO permit compliance –	Permit MFO	NOV	7/17/2012	
116				MFO			16		recordkeeping/reporting	Permit			
117	1			MFO			17		MFO permit compliance -	MFO	NOV	7/17/2012	
118	1			MFO			8		recordkeeping/reporting MFO permit compliance	Permit MFO	NOV	7/17/2012	
							Ĩ		recordkeeping/reporting	Permit		NOV21 20102	
119	1			MFO			15		MFO permit compliance – recordkeeping/reporting		PA	8/8/2012	
120	1			MFO			9		MFO permit compliance -	MFO	NOV	7/17/2012	
4,950%			_						recordkeeping/reporting	Permit	NOV		
121	1			MFO			17		MFO permit compliance – recordkeeping/reporting	MFO Permit	NOV	7/17/2012	
122				MFO			17		MFO permit compliance -	MFO	NOV	7/17/2012	

	Total Farms	Visited Basin	Basin	Farm	Date		Basin	Basin					
Case #	Visited	#1	#2	Size	Received	Site Visit	ID #1	ID #2	Nature of Complaint MFO permit compliance -	Violation MFO	Action	Date 7/17/2012	Refer To
									recordkeeping/reporting	Permit	NOY	//1//2012	
124	1			LFO	7/6/2013	7/10/2012	5		LFO permit compliance - production area		PA	7/23/2012	
125	1			MFO		1	5		MFO permit compliance	MFO	NOV	7/17/2012	
126				MFO	_		- 17		recordkeeping/reporting	Permit			
120	a.			MEO			16		MFO permit compliance – recordkeeping/reporting	MFO Permit	NOV	7/17/2012	
127	1			MFO			6		MFO permit compliance -	MFO	NOV	7/17/2012	
128	1			MFO			5		recordkeeping/reporting MFO permit compliance -	Permit MFO	NOV	7/17/2012	
									recordkeeping/reporting	Permit			
129	- 1			MFO			5		MFO permit compliance - recordkeeping/reporting	MFO Permit	NOV	7/17/2012	
130	1			MFO			16		MFO permit compliance -	MFO	NOV	7/17/2012	
131	1			MFO			6	_	recordkeeping/reporting MFO permit compliance -	Permit MFO	NOV	7/17/2012	
	- 1								recordkeeping/reporting	Permit	NOV	//1//2012	
132	4			MFO			6		MFO permit compliance – recordkeeping/reporting	MFO	NOV	7/17/2012	
133	1			MFO			16		MFO permit compliance -	Permit MFO	NOV	7/17/2012	
134	- 1			MEC.			(2)		recordkeeping/reporting	Permit	_		
134	1		ľ	MFO			8		MFO permit compliance – recordkeeping/reporting	MFO Permit	NOV	7/17/2012	
135	1		1	MFO			16		MFO permit compliance -	MFO	NOV	7/17/2012	
136	- 1	-		MFO			16		recordkeeping/reporting MFO permit compliance -	Permit MFO	NOV	7/17/2012	
							10		recordkeeping/reporting	Permit	NOV	7/17/2012	
137	1		7	MFO			16		MFO permit compliance –	MFO	NOV	7/17/2012	
138	ï		2	MFO			6	_	recordkeeping/reporting MFO permit compliance –	Permit MFO	NOV	7/17/2012	
120									recordkeeping/reporting	Permit			
139	1		1	MFO			6		MFO permit compliance – recordkeeping/reporting	MFO Permit	NOV	7/17/2012	
140	ĩ		1	MFO			6		MFO permit compliance –	MFO	NOV	7/17/2012	
141	1	-		MFO			5		recordkeeping/reporting MFO permit compliance -	Permit MFO	NOV	7/17/2012	
_							1		recordkeeping/reporting	Permit		11112012	
142	1	-		SFO	8/1/2012	8/1/2012 8/13/2012	7		Manure management – production area General AAP compliance check		PA CON	8/20/2012	
144	1			FO .	8/17/2012	8/29, 9/19, 9/25, 10/5, 11/20/12	9		Vegetative buffers	4.06(a)	PA	11/20/2012	
145	1		S	FO	8/20/2012		5		Livestock access to water / streambank issues		CON		
146	1		L	FO		7/26/2012	5		LFO permit compliance - field practices	LFO Permît	LOW	8/31/2012	
147	1			FO	0/10/00/10	6/9/2012	3		Manure management - field practices		PÄ	6/12/2012	
148	1	_		FO	8/17/2012 8/31/2012	8/17/2012 8/31/2012	4		Manure management – field practices Manure management – field practices		PA PA	8/17/2012 8/31/2012	
150	1			FO	the second se	9/24, 10/1,	13		Manure management - production area		CON	Section 14	
151	1			FO		111/5 8/30/2012	6		Construction of farm structures		PA	8/31/2012	
152	1			FO		9/11/2012 11/13/2012	6		Manure management – field practices		PA PA	11/13/2012	
153	1	_	L	FO		9/12/2012	16		LFO permit compliance - production area	LFO Permit	NOV	12/14/2012	
154	1	_		FO	9/24/2012	9/24/2012 8/13/2012	4		Manure management – field practices		PA	9/24/2012	
155	12			FO		6/27/2012	10		MFO permit compliance – field practices General AAP compliance check		PA PA	9/7/2012 9/7/2012	
	<i></i>								1				
157	1		S	FO	9/10/2012	9/10/2012 9/11/2012	6		Manure management – production area	4.01(a)	CAL	1/4/2013	
158	ġ.			1FO		9/13/2012	6		MFO permit compliance – recordkeeping/reporting		PA	9/13/2012	
159 160	1			(FO (FO	10/24/2012	10/9/2012 10/25/2012	16				CAL	1/4/2013	
161		-			0/24/2012		8		MFO permit compliance – field practices Farmer request for assistance		PA PA	11/6/2012 10/26/2012	

	Total Farms	Visited	Farms Visited Basin	Farm	Date		Basin	Basin					ų, με ^{τα} λ
Case #	Visited	#1	#2	Size	Received	Site Visit	1D #1	ID #2	Nature of Complaint	Violation	Action	Date	Refer To
162	1			MFO		8/21/2012	14		MFO permit compliance -	MFO GP	NOV	8/21/2012	
									recordkeeping/reporting	LEO CD	aut	11/12/2012	
163	1			MFO	10/21/2012	9/14/2012	8		MFO permit compliance – production area MFO permit compliance – field practices	MFO GP	PA	11/13/2012	AND
164	1			MFO	10/31/2012	11/1/2012	4		MFO permit compliance - production area	MFO GP	PA	11/7/2012	ADA
165	1			MFO	10/31/2012	11/1/2012	4	_	MFO permit compliance – production area	in o or	CON	111114016	ANR for pond
4.975					\$ 500 AC \$1 \$6.50 \$ 40	4.47.57.677.8.6			in o prime scalpanet. In an an				assessment
167	6	3	3	SFO		10/17/2012	9	10	General AAP compliance check		PA	11/6/2012	
168	5	3	2	SFO		10/18/2012	13	16	General AAP compliance check		PA	11/6/2012	
169	7			SFO		10/19/2012	9		General AAP compliance check		PA	11/6/2012	
170	5	2	3	SFO		10/23/2012	10	11	General AAP compliance check		PA	11/6/2012	
171	5			SFO		11/5/2012	13		Manure management - pre-spreading ban compliance check		PA	11/6/2012	
172				SFO		10/24/2012	13		Manure management - production area		CON		ARS
173	1		-	SFO	10/24/2012	10/24/2012	13		Carcass disposal / slaughter waste		PA	11/15/2012	
173	1			SFO	11/9/2012	11/15/2012	8		Silage leachate	4.01(a) & (b)	CAL	1/4/2013	ANR ,
175	1			SFO	11/16/2012	11/19/2012	6	-	Manure management - production area	1.07	PA	11/19/2012	
176		_		MFO	11110/2012	12/6/2012	4		Manure management - production area		PA	12/6/2012	
177	1			MFO		10/11/2012	5		MFO permit compliance – production area	MFO GP LFO Rules	AOD	in progress	
178	1		_	LFO	11/30/2012	12/6/2012	3	_	LFO permit compliance - production area		CON		
179	1			SFO		12/3/20121 2/5/2012	6		Manure management - production area	4.01(b) CDO	NOV	1/10/2013	
180	1			LFO		12/28/2012	6		LFO permit compliance –field practices	LFO Permit	NOV	in progress	
181	7			SFO		11/2/2012	9		Manure management - pre-spreading ban compliance check		PA	12/3/2012	
182	8			SFO		11/21/2012	9		Manure management - pre-spreading ban compliance check		PA	12/3/2012	
183	4			SFO		11/26/2012	8		Manure management - pre-spreading ban compliance check		PA	12/3/2012	
184	6	3	3	SFO		11/25/2012	9	14	Manure management - pre-spreading ban compliance check		PA	12/3/2012	
185	6			SFO		11/29/2012	16		Manure management - pre-spreading ban compliance check		PA	12/3/2012	
186	1		_	MFO		12/4/2012	8	_	MFO permit compliance - field practices	MFO GP	CAL	in progress	
187	1	4		SFO	11/5/2012	11/16/2012	8		Livestock access to water / streambank issues	and the second s	PA	11/19/2012	
188	Ĩ	-		MFO		12/6/2012	1	_	MFO permit compliance - production area	MFO GP	NOV	12/17/2012	
189	1			MFO	12/17/2012	12/18/2012	3		MFO permit compliance - production area		PA	12/18/2012	
190	Ì			SFO		12/5/2012	17		Silage leachate		AGO		
191	1			SFO		12/2/2012	5		Manure management - production area		PA	12/12/2012	
192	1			SFO	10/31/2012	11/1/2012	4		Manure management - field practices		PA	11/1/2012	
193	1	_		MFO	10/31/2012	11/1/2012	4		MFO permit compliance – field practices Manure management - pre-spreading ban		PA	11/1/2012	
194	8			SFO		12/11/2012	16	_ W	compliance check		PA	12/11/2012	
195	3			SFO		12/17/2012	8		Manure management - spreading ban compliance check		PA	12/17/2012	
196	9		9	SFO		12/18/2012	9		Manure management - spreading ban compliance check		РА	12/18/2012	
197	3			SFO		12/19/2012	8		Manure management - spreading ban compliance check		PA	12/19/2012	
198	5			SFO		11/7/2012	n		Manure management - pre-spreading ban compliance check		PA	11/7/2012	
199	4			SFO		11/8/2012	9		Manure management - pre-spreading ban compliance check		PA	11/8/2012	
200	6			SFO		11/9/2012	13		Manure management - pre-spreading ban compliance check		РА	11/9/2012	
201	5	3	2	SFO		11/13/2012	13	14	Manure management - pre-spreading ban compliance check		PA	11/13/212	
202	6	3	3	SFO		11/19/2012	ū	13	Manure management - pre-spreading ban compliance check	1	PA	11/19/2012	

Case #	Total Farms Visited	Visited Basin	Farms Visited Basin #2		Date Received	Site Visit	Basin ID #1	Basin ID #2	Nature of Complaint	Violation	Action	Date	Refer To
203	4			SFO		11/28/2012	10	2)	Manure management - pre-spreading ban compliance check		PA	11/28/2012	
204	5	2	3	SFO		11/29/2012	9	10	Manure management - pre-spreading ban compliance check	2	PA	11/29/2012	
205	6			SFO		12/3/2012	13		Manure management - pre-spreading ban compliance check		PA	12/3/2012	
206	6	3	3	SFO		12/7/2012	13	16	Manure management - pre-spreading ban compliance check		PA	12/7/2012	
207	6			SFO		12/21/2012	9		Manure management - spreading ban compliance check		PA	12/21/2012	
208	5			SFO		12/24/2012	14		Manure management - spreading ban compliance check		PA	12/24/2012	
209	.6	3	3	SFO		12/26/2012	8	9	Manure management - spreading ban compliance check		PA	12/26/2012	
210	8			SFO		12/20/2012	1		Manure management - spreading ban compliance check		PA	12/20/2012	
211	12			SFO		12/21/2012	3		Manure management - spreading ban compliance check		PA	12/21/2012	
212	7			SFO		12/17/2012	9		Manure management - spreading ban compliance check		PA	12/17/2012	
213	10	5	5	SFO		12/18/2012	n		Manure management - spreading ban compliance check		PA	12/18/2012	
214	= 11			SFO		12/20/2012	16		Manure management - spreading ban compliance check		PA	12/20/2012	
215	6	3	3	SFO	L	12/21/2012	. 11		Manure management - spreading ban compliance check	-	PA	12/21/2012	