

US EPA ARCHIVE DOCUMENT

Quarterly Report 6 - Covering the second quarter of calendar 2006 (April through June)

I. WORKPLAN REVISION – Refer to CAworkplanfinal.doc, September 20, 2004.

In the previous quarterly report (first quarter calendar 2006), MPCA was beginning to shift the focus of the FERP project from the third-party certification process to a self-certification process. That report included an early outline of additional tasks. This report presents the additional tasks as a formal workplan with a more accurate projected timeline.

Project purpose

Phase 1 – The first year of work (2005) will now be referred to as Phase 1. As was explained in earlier project reports, Phase 1's mechanisms evolved in response to more detailed feedback from project partners. After intending to have Minnesota Milk Producers Association (MMPA) technicians assist dairy producers in accomplishing a self-certification, we had to change the approach to having MMPA administer its existing assessment and certification tools in a directly-assisted manner, with final certification of qualifying farms being done by MMPA. The project essentially became an evaluation of the MMPA's third-party certification program's ability to deliver desired compliance and performance assessments. As we reported at the time, this was clearly a departure from the original workplan. Conference calls and other discussions indicated EPA's willingness to support the changes.

At this time, we have "capped" Phase 1 participation at the original 37 volunteers assessed in the second half of calendar 2005. The 37 volunteers are located in 2 counties with feedlot programs delegated by the state (Stearns and Winona). MMPA technicians will provide assistance to the volunteers as requested. If and when a volunteer is ready to have his or her final (certification) assessment done, MMPA technicians (accompanied by county feedlot officers – CFOs - from the participating counties) will conduct those assessments and certify where warranted.

Supported by MMPA, MPCA will continue to monitor the progress of assistance and certification assessments, gathering as much of the originally-intended output, behavior change, and outcome data as is possible. This will continue through September 2007. If any of the volunteers have not had certification assessments at that time, MMPA and CFOs will conduct final project walkthroughs to assess progress up to that time. This data will be presented in the project's final report.

Note that MPCA has submitted to EPA a request to extend the cooperative agreement at no additional cost through December 31, 2007, adding a full year to the project.

Phase 2 – MPCA has formally added a second phase to the project, essentially a pathway parallel to Phase 1. In Phase 2, MPCA will deploy a self-assessment/certification tool to volunteers in 4 counties which do not have delegated feedlot programs. We feel this will allow MPCA to test a certification model which mirrors the ERP standard used by other states, and bring us closer to the work originally intended under the cooperative agreement.

Phase 2 was added primarily because of the following factors discovered through Phase 1:

- delegated counties appear able to inspect their small dairies at least every 2-4 years, suggesting less of a need for an Environmental Results Program-type of self- or third-party certification process in those counties (although MPCA's self-certification pilot may inform future county program structure);
- in contrast, MPCA needs additional compliance monitoring tools or resources in non-delegated counties;
- any attempt to use the EQA program as a one-for-one stand-in for regulatory inspections would require significant adjustment of expectations and the core compliance measures the MPCA needs when working with small farms;
- MMPA's certification program has demonstrated significant (and increasing) strengths, so that MPCA already has enough data to warrant continuing support and promotion of the program (including a scoring advantage for MMPA-certified farms which are applying for state cost share funds), plus a long-term policy of consideration of MMPA certification when scheduling inspections or developing enforcement actions;
- to encourage greater use, fees for farmer participation in the MMPA certification program have not been structured to fully fund the program, so if MMPA were to expand the program to support MPCA's wider compliance assessments needs, fees would have to rise and/or MPCA would have to commit more funds to the MMPA certification program for the foreseeable future.

The project's overall purpose remains the same, except that in Phase 2 the MPCA will provide all field presence, including inspection and assistance. No Minnesota Milk Producers Association technicians or county feedlot officers will be deployed under Phase 2, although the MMPA will assist MPCA in recruitment, and in developing self-assessment and self-certification materials.

Project goals and objectives

Project goals and objectives remain the same.

Geographic focus

Phase 1 will continue monitoring the progress of the volunteers in Stearns and Winona counties. If county resources are available, we will also monitor progress of the control group farms as well. However, we will concentrate our control group work in the counties we have selected for piloting self-certification during Phase 2: Ottertail (west central); Kanabec, Pine, and Carlton (all east central). For a map, scroll halfway down the first page of <http://www.pca.state.mn.us/hot/pubs/feedlot-countycontact.pdf>.

Partners, Roles and Responsibilities

- MMPA's Phase 1 roles and responsibilities will continue as originally defined. In Phase 2, MMPA will assist in project design, in drafting the compliance/performance workbook and self-certification, and in recruiting participants. MMPA's contract is being amended to reflect these changes, and it will be extended a year - to September 2007 – with no change in cost.
- Winona and Stearns County staff will continue their roles as originally planned for Phase 1, but this will extend to fall 2007 instead of the originally-planned fall 2006.
- Phase 1 ended up with 37 volunteers; 50 control group sites. MMPA and county roles and responsibilities remain as originally defined for these sites, except that MPCA will not require counties to conduct end-of-project inspections for all control group members. Instead, we will encourage the 2 counties to include those sites in their 2007 workplans, but will accept as many (or as few) as the counties are able to complete.
- MPCA has completed initial recruitment of volunteers in the 4 Phase 2 counties. We stand at 34 definite and 7 possible. MPCA staff will work with MMPA staff to secure the 7 possibles or recruit others as necessary to round out the volunteer group at 40. MPCA will select 50 control group farms and MPCA staff will begin baseline inspections in September 2006.
- EPA roles and responsibilities remain as originally defined.
- MPCA feedlot program (Regional Division) and Prevention and Assistance Division staff will co-manage the project, lead project design, coordinate drafting the compliance/performance workbook and certification materials, and train MPCA field staff.
- MPCA Prevention and Assistance Division staff will provide technical assistance and administration of the EPA cooperative agreement.

Stakeholder involvement

Stakeholder involvement efforts will remain the same. Beyond the project participants and peer governmental or industry individuals or organizations, however, it has been difficult to engage environmental or community stakeholders. This is primarily because of their lack of resources and a resulting priority of paying attention to large feedlot projects and policy.

Lead MPCA staff

Co-Project Manager – Kate Brigman, Regional Division (Mankato office)

Co-Project Manager – Al Innes, Prevention and Assistance Division (St. Paul office)

Grant Champion/Lead Investigator – Bob Finley, Regional Division, manager of the Southwest Region and feedlot program

Project Staff – Kimberly Nuckles, Regional Division (Rochester office)

Project workplan

The geographical and herd size distribution of volunteers so far is as follows:

County	1-10		11-50		51-100		101-200		201-300		301-400		401-500		>500		All dairies	Total volunteers
	all	vol	all	vol	all	vol	all	vol	all	vol	all	vol	all	vol	all	vol		
Pine	0	0	22	0	12	2	23	3	20	1	10	1	5	0	7	0	99/15.8%	7/17.5%
Carlton	2	0	17	1	2	0	6	1	4	0	1	1	1	0	4	0	37/5.9%	3/7.5%
Kanabec	1	0	11	1*	8	1*	13	1	10	0	2	0	1	0	2	0	48/7.7%	3/7.5%
Ottertail	8	1	71	3+1*	68	2+2*	108	6	83	5+1*	43	4	26	3	34	0	441/70.6%	27/67.5%
Total	11	1	121	6	90	7	150	11	117	7	56	6	33	3	47	0	625	41

*From MN Department of Agriculture database: not apparent in MPCA database.

The control group will be selected at random from the same database used for mailing the recruitment letter, minus the volunteers. The control group will mirror county proportions (2 columns on the right in the table above). Selection will be random, with a total of 50 from the 4 counties. We will begin control group inspections in September, slightly ahead of

volunteer group activity and our inspection of 10-20% of that group. Realistically, control group inspections will be spread out from September through November, so we will not be able to control for the possibility that the pilot's presence in a county might affect the behavior of non-volunteers (the control group). This is because the 2 MPCA staff assigned are also primarily assigned to these counties.

Both the 10-20% of volunteers and the control group will undergo baseline and follow-up inspections. Project inspection staff will use the same checklist that the volunteers will use, which is why control group inspections must wait until that new checklist is finalized. MPCA will conduct before-and-after Feedlot Evaluation (FLEval) modeling at all sites in both groups. The control group inspectors will conduct FLEvals as part of their inspections. Other project staff will conduct FLEvals at the volunteer's farms, timed to follow the volunteers' initial self-assessment but to precede any corrections the volunteers make. This procedure should minimize MPCA's influence over the volunteers' self-assessment. Our design is to have one staffer conduct the same functions over time at each site.

II. PHASE 2 PROGRESS

Following are new workplan items relating specifically to Phase 2 – we do not plan to integrate the Phase 1 and Phase 2 workplans, or to further amend the Phase 1 workplan. Quarterly reports will track progress on each Phase separately.

PHASE 2 TASK	LEAD STAFF	PROJECTED COMPLETION DATE	MILESTONES/ DELIVERABLES	STATUS in late August 2006
Revise and finalize Phase 2 workplan	Innes	5/06	Workplan to EPA	Drafted in May; delivered in August
Define facility universe; identify facilities for outreach	Innes	Mid 4/06	Mailing list combining MPCA, MDA databases	Completed June
Recruitment letter	Brigman	Early 5/06	Recruitment letter	Completed June
Mailings and MPCA web site notice	Innes	Early 5/06	~600-piece mailing	Mailing late June; web page under development
Draft core compliance and performance indicators, and inspector checklist	Brigman/Innes with program	4/06	Draft self-certification and inspector checklist	Early drafts now in revision; complete by 9/15
Dry run self-certification with dairies	Brigman	5/06		3 runs completed July; another round in September?
Finalize self-certification and inspector checklist	Brigman/Innes with program	9/06	Checklist with core indicators and project metrics integrated	
Review recruitment progress and follow up as necessary	Brigman	9/06	Goal: 40 volunteers	
Develop and print Workbook	Brigman/Innes with program & stakeholders	9/06	50 completed workbooks - web page availability	
Review statistical methodology	Innes	9/06	Methodology	Drafted in June
Finalize core compliance and performance indicators	Brigman with program	9/06	Final core compliance and performance indicators	
Revise and submit QAPP to EPA	Innes	Early 9/06	QAPP submitted	Simplified version for Phase 2 in draft
Generate sample for control group	Innes	9/06	Complete control group sample	
Inspector training	Brigman	5/06 9/06	- 6 inspectors and supervisors trained in ERP - inspectors trained in final checklist	Completed 5/16/06
Develop a procedure for self-certification and inspection data collection and entry	Innes/Brigman with IS staff (D Olson)	Fall 06	Process in revised QAPP - independent databases or adaptation of MA ERP tools	Discussions with MPCA IS staff

PHASE 2 TASK (CONTINUED)	LEAD STAFF	PROJECTED COMPLETION DATE	MILESTONES/ DELIVERABLES	STATUS in late August 2006
Get QAPP Approval from EPA	Innes	Fall 06		
Presentation to MPCA feedlot staff	Brigman/Innes	Ongoing		
Mail self-certifications and workbooks to volunteers	Innes	9/06	Certification mailing	
Control group inspections	Inspectors	9/06-11/06	40-50 inspections	
First round of self-certifications and return-to-compliance (RTC) plans	Volunteers	9/06-11/06	Goal: 40	
“Red flag” screen – incomplete or inconsistent responses	Brigman, Innes	10/06-11/06	Data for follow-up	
Data entry and quality assurance	Innes and support staff	10/06-11/06		
Follow-up telephone audits or inspections on RTC plans	Inspectors	Fall 06	Number unknown	
MPCA assistance	Inspectors Brigman	Fall 2006 Winter 2007	On-farm and phone assistance	
Presentation to MN Association of County Feedlot Officers (MACFO) conference	Brigman/Innes	10/06		10/26/06 session has been designed
Post-baseline follow-up and analysis	Innes/Brigman	1/07		
Second round: control group inspections	Inspectors	9/07-11/07	50 inspections	
Second round of self-certifications	Volunteers	By 11/07	Goal: 40	
“Red flag” screen – incomplete or inconsistent responses in certs or RTCs	Brigman, Innes	10/06	Data for follow-up	
Data entry and quality assurance	Innes support staff	11/07		
Follow-up telephone audits or inspections on RTC plans	Inspectors	Fall 07	Number unknown	

III. PHASE 1 PROGRESS

The following table covers Phase 1 progress through June 30 on tasks listed *in the original workplan which are still pertinent to the Phase 1 third-party certification work*. Some grouping has been done to shorten the list. Open or ongoing tasks from preceding quarters are listed first followed by double bold lines.

PHASE 1 TASK	ORIGINAL COMPLETION DATE	ACTUAL COMPLETION DATE	MILESTONES/ DELIVERABLES	COMMENTS
Periodic check-in with Feedlot Management Team	Monthly	Quarterly	Average 1 meeting per quarter	As necessary
Communication with Governor’s Livestock Task Force	Informal	Thru MPCA Ag Liaison		Communicate with Ag Liaison for now – with Task Force after significant findings
Revise and finalize full project workplan	2/28/05	8/06	Workplan to EPA	Workplan for Phase 2 self-certification is presented above

PHASE 1 TASK CONTINUED	ORIGINAL COMPLETION DATE	ACTUAL COMPLETION DATE	MILESTONES/ DELIVERABLES	COMMENTS
Quality Assurance for Facility Universe	3/28/05	Open		MPCA's project database has being updated and combined with MDA milk licensure database
EQA technician assistance	3/7/06	Ongoing through fall 07	15 farms were provided on-farm and follow-up assistance through 3/06; 10 farms were provided assistance April through July; 4 certification walkthroughs completed resulting in Five-Star certification	
Inspections and ongoing data entry	6/2/06	Ongoing through fall 07	County feedlot officers accompanied on 4 certification walkthroughs	MPCA will be collecting data from accompanying inspectors
Quarterly Report 2, Year 2	4/30/06	5/3/06	Quarterly report transmitted to EPA and partners	

IV. LEVEL OF EXPENDITURES

Financial Information removed by EPA as confidential business information.

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