

US EPA ARCHIVE DOCUMENT

Quarterly Reports 2 & 3 - Covering the second and third quarters of calendar 2005 (April through September)

- I. Achievement of Milestones – the following table covers tasks, milestones, or major deliverables scheduled through September 30 *in the original workplan*, although some grouping was done to shorten the list. Quarters when work was completed are separated by double bold lines.

TASK	ORIGINAL COMPLETION DATE	ACTUAL COMPLETION DATE	MILESTONES/ DELIVERABLES	COMMENTS
Periodic check-in with Feedlot Management Team	Monthly	Quarterly		Monthly if necessary
Communication with Governor's Livestock Task Force	Informal	Thru MPCA Ag Liaison		
Generate 2 to 3 scenarios based on different responses by participants	4/1/05	1/20/05	Sampling analysis from Cadmus	Be prepared for recruiting results, when known
With external partner group, develop marketing strategy	10/13/04	3/30/05	Recruitment strategy	Full strategy not needed (yet)
With external partner group, develop a plan for communicating with all relevant stakeholder groups	1/28/05	Open		No plan yet; ongoing consideration
Revise and finalize full project workplan	2/28/05	Open	QAPP as basis	Still needed?
Finalize compliance goals	3/21/05	Open		Compliance goals are still being discussed - progress (how much?) towards compliance or improvement will be sufficient
Basic project awareness training for MPCA, county feedlot staff, Dept of Agriculture dairy inspectors, and MMPA technicians	3/21/05	Not done		Should reassess need and timing – was not necessary to proceed with pilot
Quality Assurance for Facility Universe	3/28/05	Open		May use Student Worker and/or new position to resolve disparities between MPCA, county, MDA databases
Define facility universe; identify facilities for outreach	3/28/05	4/4/05	Mailing list based on MDA database	
Draft, review and finalize brochure and recruitment cover letter	3/9/05	4/18/05	Recruitment brochure and cover letter	Tested with partners
Draft and finalize project-specific enforcement policy incentive	2/25/05	4/19/05	In place	
Mailings and co-presentations with MMPA; MPCA web site notice	4/1/05	4/26/05	1,070-piece mailing	No web page developed yet
Quarterly Report 1, Year 1	4/29/05	5/18/05	Quarterly report to partners	No web page developed yet
MPCA develops sole source grant and workplan with MMPA; award	1/3/05	6/2/05	Executed grant	
Maintain external partner group	10/13/04	6/14/05	E-mail network	
Draft environmental business practice indicators, inspector checklist	12/20/04	7/6/05	Draft EBPIs	EBPIs drafted with stakeholders
Identify county inspectors	10/22/04	7/29/05	Inspectors in place	

TASK	ORIGINAL COMPLETION DATE	ACTUAL COMPLETION DATE	MILESTONES/ DELIVERABLES	COMMENTS
Finalize inspector checklist	4/29/05	7/29/05	Checklist with EBPIs and project metrics integrated	
Dry run checklist with "Five-Star" dairy	4/4/05	8/1/05		
Review recruitment progress and follow up as necessary	4/29/05	8/1/05	20 volunteers at this point	Further recruitment
Develop and print Workbook	5/9/05	8/1/05		Adopted the EQA workbook
Generate sample from volunteer participants, and sample for control group	6/20/05	8/2/05	Complete control group sample	All volunteers accepted: no sampling
Deliver training for all inspectors and technicians (each county)	7/12/05	8/15/05	2 trainings completed Partner roles finalized	
Identify state inspectors	9/24/04	8/30/05	Inspectors in place	
Drafting and review of the statistical methodology	4/29/05	9/12/05	Draft methodology (discussed with EPA 6/1/05)	EPA first saw methodology in QAPP redraft
Locate and tap statistical expertise	10/15/04	9/16/05	EBPIs, DQOs, and a refined data gathering process	Cadmus (through EPA)
Finalize EBPIs	3/21/05	9/16/05	Final EBPIs, including compliance goals	Data needs were reviewed by stakeholders prior to assessments/ inspections, EBPIs
Revise and Submit QAPP for EPA	12/22/04	9/28/05	QAPP submitted	
Develop a procedure for handling assessment/inspection data collection and entry	3/21/05	9/28/05	Process in revised QAPP - independent databases to start	Project staff for now
Finalize statistical methodology	6/6/05	9/28/05	Final methodology	Volunteer pool virtually complete
Present at MN Association of County Feedlot Officers conference	10/28/05	10/27/05		Attended, but no presentation
Quarterly Report 2, Year 1	7/29/05	11/7/05	Quarterly report to partners	Sent with Qtr3 report
Quarterly Report 3, Year 1	10/30/05	11/7/05	Quarterly report to partners	Sent with Qtr2 report
Fall meeting offered for all stakeholders, including non-participants	10/28/05	Open		Seek opportunities this winter
First round of volunteer assessments and control group inspections	10/28/05	Open	As of 9/30: 27 of 39 assessments complete, approx. 35 of 55 control inspections complete	
Get QAPP Approval from EPA	6/14/05	Awaiting		

II. Discussion

The first quarter (January to March 2005) report discussed several issues:

- Difficulty managing the project workload among other priorities, and resulting delay – In the third quarter (July through September), MPCA made significant adjustments to staffing to bring more resources to bear on the project. These adjustments have paid off in helping handle the upsurge in activity as

assessments and control group inspections began. We continue to work on establishing a temporary position to take on planned project work and new issues which are emerging. In addition, we should have student worker assistance available as well. The Milk Producers Association completed a new hire in June, which greatly facilitated project work on their end.

- Timeline for volunteer signups –

This did slide into the fall to maximize the number of signups we could get in this season. Most signups were in place in August, however, with only a few stragglers since.

- Having to move away from true "self-certification" –

This remains the same as well. Certification is no longer in play in the project, at least for now with the volunteer pool. Initial (baseline) "assessments" (not inspections) and final project assessments near the end of the project will be conducted by MMPA technicians and state/county regulatory staff acting in a data-gathering, non-regulatory role.

- Volunteers are primarily non-CAFO facilities –

With final numbers in, only one volunteer out of a total of 40 is a CAFO. All others are 300 animal units or less, which makes them part of the county/state program. The CAFO will be included in final data sets, unless significantly anomalous, but will not be eligible for MPCA's limited assurance of non-enforcement for volunteers within the project period.

Other issues worthy of notice and discussion and surfacing in the last two quarters include:

- Late revision of the QAPP

It should be noted that, because of delays and related seasonal pressures to make progress, MPCA and partners began project field work before EPA approved the revised QAPP. This was not MPCA's intent and may place some data at risk, however, project staff made efforts to compensate for this by:

1. offering stakeholders including EPA opportunities to provide input on the proposed measures before any project field work had begun – this allowed us to go into the field with checklists which gathered the feasibly-available underlying data while the EBPIs were finalized later in the QAPP;
2. adding layers of observation by MPCA project staff to monitor the consistency of partner field staff's process and data collection;
3. restricting the number of different MMPA and county staff involved to reduce variability in data collection;
4. getting feedback from ERP/statistical staff at The Cadmus Group on these project data oversight issues and on the sampling technique for the control groups.

Project staff are satisfied that the control groups are well-matched to general dairy distribution as a result of these efforts.

- Database development/other IT work

We have removed from this report the electronic interchange tasks which were in the original workplan. In large part, this is due to a generally-overloaded IT section within MPCA, plus other changes being considered or developed for the feedlot database and field data submittal system which were already in the pipeline. Also, the small number of facilities involved (<150) and the move away from self-certifications and related notifications reduced the need for an electronic form of data exchange. That will be re-evaluated.

These last factors also have also contributed to a decision not to immediately implement an automated, customized electronic database in which to house project facility data. We plan on going through a round of data entry and analysis in order to become better educated about the functionality we will require from a customized database. Once we have that picture in place, our IT section is poised to begin development.

Because of resource limitations and the small number of facilities participating, MPCA has also postponed development of a project web page. That development may be possible in the winter (first calendar quarter) of 2006 after the fall's intensive data gathering and analysis have passed.

- Facility universe

Project staff are as yet uncertain whether the right universe (i.e., database of dairies) was selected. It was beyond the expertise of project staff and other MPCA staff available at the time - and might have introduced as much as a full year's delay - to have attempted to update and reconcile the regulatory databases of dairies at the MPCA, participating counties, and the MN Dept. of Agriculture. The disparities between the data sources could be due to several factors, including attrition of dairies since the older (regulatory) databases were established, and the possibility that regulatory databases contained multiple site registrations per producer, which is how MDA records appear to be organized. The decision was made to use the most recent data from MDA from which to draw control group samples and make statistical comparisons. This should suffice for project purposes.

In the long term, however, MPCA feels it is imperative to gain a better understanding of the disparity between dairy databases and to accomplish a better reconciliation of the content in each. That will be discussed at MPCA and in later project reports.

- Early analysis

As of 9/30/05, 27 farms had been assessed by the Milk Producers' EQA Technician and a County Feedlot Officer, leaving 13 sites to be assessed.

The highest prevalence of deficiencies was in Nutrient Management, including lack of Nutrient Management Plan, recordkeeping, soil testing, manure spreader calibration, or nutrient application rate. However, only 2 sites overlapped these types of nutrient management deficiencies with possible routes to surface or groundwater, or with the presence of high-phosphorus soils. This means that few sites had significant, immediate action issues.

Other assessed deficiencies were Open Lot runoff, clean water diversions, milkhouse waste management, odors (manure stockpile, liquid manure storage, manure storage construction), habitat, community image, and wells. In all these areas though, fewer than 10 of the 27 assessed facilities displayed these issues. This bodes well for their ability to make corrections in relatively short order.

Generally speaking, assessed farms scored well for use of conservation cropping. That plus the EQA Technicians' attention to wildlife habitat (an unregulated environmental aspect) suggests that the farms will be well-positioned when the Conservation Security Program payments extend to their watershed.

On deck is analysis of the remaining technician assessments and review of the County Feedlot Officers' view of both the assessed farms and the control group farms, which are receiving only regulatory inspections.

- Workplan revision

In the original workplan, project staff included a task of revising the workplan and presumably submitting it to EPA. However, we feel much of that work has been completed in the QAPP. Project staff would like to discuss with EPA the need to complete a full workplan revision.

III. Level of Expenditures

Financial information removed by EPA as confidential business information.

Contact: Al Innes (MPCA) 651-296-7330
Kate Brigman (MPCA) 507-389-1775