



# Whatcom Conservation District

6975 Hannegan Road, Lynden, WA 98264 Phone: (360) 354-2035 x 3 Fax: (360) 354-4678  
e-mail: wcd@whatcomcd.org

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December 5, 2005

Via email

Mr. Kevin Hancock  
Department of Ecology  
PO Box 47600  
Olympia, WA 98504-7600

RE: Comment to Draft October 19, 2005 General Permit for CAFO's

Dear Mr. Hancock:

The Whatcom Conservation District is formally submitting these comments to the above referenced. Some were discussed with you at the Mt. Vernon workshop by Chris Clark, Engineer in Training, Animal Waste System Specialist. You should contact him directly should you have questions.

Definitions: 10. "Multi-year phosphorus application"... "until the applied phosphorus has been removed from the field via harvest"...

-Soil Test P and applied phosphorus (manure test P) do not equal available phosphorus or removable phosphorus. Allow planner to evaluate phosphorus needs and application schedules. **Adopting the approval checklist developed as part of RCW 90.64, the planner must develop the plan to clearly describe when nutrients can and should not be applied. A copy of the checklist is attached.**

**New Definitions:** Please add following definitions to the Permit.

*"Approval"* **If** a Nutrient Management Plan contains the elements identified in S3 a conservation district shall approve the plan no later than ninety days after receiving the plan.

*"Certification"* **An** approved plan shall be certified by a conservation district and a permittee when the elements necessary to implement the plan have been constructed or otherwise put in place, and are being used as designed and intended.

- The Revised Code of Washington describes the "Approval/Certification" process for nutrient management plans. This has proved to be an effective model that should continue for all livestock operators. It would be a major setback to retreat from the current scheme for dairy producers. There is no rational distinction to be made between dairy producers and other livestock operators. The General permit should be consistent with State Law.

S2B5b "change in character of effluent" triggers public notice and SEPA Requirement.

-This general language requirement would increase workload, cost and time for implementing Best Management Practices. In practice a change in character of effluent happens throughout the year with seasonal and climate differences and cannot be fully described in plan. **This requirement should be removed and left to county building and codes departments.**

S3A1b Equivalent best management practices may be used ...if "they are approved by Washington Department of Agriculture".

-Department Agriculture Staff does not have technical staff with this expertise or approval authority at this time. In order to apply for permit, plan development including equivalent best management practices approval must be completed and installed. **Identify specifically who to send equivalent best management practices request to, otherwise leave the alternative practices approval with the Conservation Commission by adopting the approval checklist developed as part of RCW 90.64.**

S3A3bi "*Determination of application rates*....plan must include assessment ...to address...timing and method of application".

-Change in character of effluent happens throughout the year with seasonal and climate differences and cannot be fully described in plan. **Adopting the approval checklist developed as part of RCW 90.64, the planner must address major factors influencing "character of effluent" and provide balance sheet for crops.**

S3A3eii *Setback requirements*. Alternative practices...

-Current NRCS 393 filter strip requirement is 20 ft. minimum. Does this BMP need to be approved as an equivalent best management practice? **Identify specifically who to send equivalent best management practices request to, otherwise leave the alternative practices approval with the Conservation Commission by adopting the approval checklist developed as part of RCW 90.64.**

S3B *Nutrient Management Plan Approval & Implementation*

- "Coverage under this general permit constitutes initial approval of the nutrient management plan". Coverage should follow only after the nutrient management plan has been "approved". We have developed, approved and certified hundreds of nutrient management plans. Some of these plans were developed by outside consultants. Those needed a great deal of review and comment in order to meet the statutory elements. To provide blanket "approval" in the manner presented by this rule does not ensure the adequacy of the plan in terms of meeting permit requirements.

- "Certification" is the next essential step. We have assisted hundreds of dairy producers to implement their plans. Plans don't protect water quality rather; it is the implementation of the plan. This is not intuitive! They need assistance, monitoring and review to accomplish this. This has proven to be effective and should not be abandoned. Further, the General Permit should include this step to be consistent with State law respecting dairies.

S3C *Nutrient Management Plan Compliance*

-Change in character of effluent happens throughout the year with seasonal and climate differences and cannot be fully described in plan. Times and concentrations of land applications must change to accommodate climate and management. **Adopting the approval checklist developed as part of RCW 90.64, the planner must address major factors influencing "character of effluent" and provide balance sheet for crops. In addition, the planner must develop the plan to clearly describe when nutrients can and should not be applied.**

S3D *Nutrient Management Plan Updates*

-Changes in ground water quality maybe due to time lag or other sources of contamination. Adaptive management should be used as a tool between planner and CAFO. Crop rotation and sequence may not be reflective in plan. **Updates should be necessary only when balance of nutrients or identified practices have changed.**

S4C2b *annual fall test*

-Westside environmental report card test is subject to variable environmental conditions that can make results difficult to link to management activities. It is not determinative but can be useful as a management (not regulatory) tool. Eastern Washington producers would benefit from using current late winter/spring sampling protocol in accordance with university recommendations. **Adopting the approval checklist developed as part of RCW 90.64, the planner must describe soil testing procedures.**

S5 "...post construction documents signed and stamped by a ...professional engineer (PE), who made on-site construction inspections"

- This fails to recognize that there are NRCS/CD technical personnel who have the expertise to and are working under a PE. It is unlikely that PE will provide the oversight contemplated by this requirement without presenting an undue burden. NRCS personnel work under the state engineer out of Spokane. **Allow storage facilities to be signed off by personnel with job approval authority or PE.**

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G1 "The application... more frequently than, or at a concentration in excess of that authorized by this general permit shall constitute a violation..."

-This ignores that farming occurs in a dynamic, natural environment. Change in character of effluent happens throughout the year with seasonal and climate differences and cannot be fully described in plan. Times and concentrations of land applications must change to accommodate climate and management. It is impossible to anticipate all the combinations of rainfall, temperature, growing season with precision. You are setting up a situation where folks cannot comply with their plan. **Adopting the approval checklist developed as part of RCW 90.64, the planner must address major factors influencing "character of effluent" and provide balance sheet for crops. In addition, the planner must develop the plan to clearly describe when nutrients can and should not be applied.**

**G12. "This permit may be modified... B. When Effluent limitations guidelines are promulgated..."**

- The permit should be modified when the ELGs are promulgated. The ELGs should represent AKART. Presently there is a zero discharge tolerance for bacteria. It may be that this is more stringent than is appropriate. Using ELGs should ensure a responsible level of environmental protection without an undue amount of regulation.

Thank you for considering these comments. Again, if you have questions, please call Chris Clark, EIT, at: (360) 354-2035 x 124 or email at: [cclark@whatcomcd.org](mailto:cclark@whatcomcd.org)

Sincerely yours,



George J. Boggs  
District Manager

**From:** George Boggs [GBoggs@whatcomcd.org]

**Sent:** Monday, December 05, 2005 3:54 PM

**To:** Hancock, Kevin

**Cc:** john-larson@wa.nacdn.net.org; bahrych@rockisland.com; lynn brown;  
mark.clark@scc.wa.gov; Fkcolvin@cs.com

**Subject:** RE: Attachments to Comments

**Importance:** High

Mr. Hancock:

Here are the approval and certification checklists that were referenced in our comments. I believe these demonstrate why approval and certification are both necessary steps. "Coverage" under the general permit is appropriate for determining the elements of an acceptable plan but not providing "initial approval of the plan". It takes the review of an experienced, trained professional to ensure that plans are sufficiently developed then implemented.

Regards

George J. Boggs

Manager, Whatcom Conservation District  
6975 Hannegan Road, Lynden, WA 98264  
360.354.2035x115; fx 4678

## Checklist for Conservation District Approval of a Dairy Nutrient Management Plan

All answers must be yes for a conservation district to approve this plan. If all answers are yes, the district board of supervisors must approve the plan. If any answer is no, the district cannot approve the plan.

When approval is denied, the district must explain the changes required to obtain plan approval. The explanation must be in writing, and it must be delivered to the applicant within 90 days of the date the plan was received by the district.

|  |   |
|--|---|
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Do all standard practices meet the standards, specifications and methods described in the NRCS Field Office Technical Guide and the NRCS Agricultural Waste Management Field Handbook, and if alternative practices are utilized, have such practices been approved by the Washington Conservation Commission?  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Is a summary of the operation included (name, location, acres available for nutrient management, herd size, existing nutrient management facilities)?   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Does the dairy nutrient management plan developed after November 1, 1998 follow the planning format adopted by the Washington Conservation Commission?  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Have the following been inventoried and evaluated to identify potential pollution sources and to determine water quality protection needs: all fields used in the dairy operation; cattle confinement areas; barns; milking facilities; waste collection, handling and storage facilities; feed storage and mixing areas; riparian areas; irrigation systems; and drainage systems? |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | If the plan has not been fully implemented, is there a schedule of planned practices listing the location, what will be done, how much will be done and when it will be completed?  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Are forage and crop fields identified and their acreage shown on an aerial photo, topographic map or a plan map drawn to scale?   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Is a month-by-month nutrient application schedule included? A nutrient balance sheet (including nutrient requirements of crops that will receive dairy wastes)?   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Are crop yield values or estimates supported in the plan, or in the dairy producer's case file?   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | If manure must be utilized elsewhere, are off-site manure management agreements included in the plan?   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Is an operation plan included for the waste management system?  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Are the major factors influencing the quantity of manure and wastewater described (e.g., herd size and composition, climatic data, existing runoff controls, etc.)?   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Are existing manure and wastewater collection systems evaluated, and needed improvements described?   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Are storage facilities for solid and liquid manure described, are storage needs described, and are the calculations and worksheets used to determine storage needs included?  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Are transfer facilities and systems described?  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | If the manure or wastewater is treated, is this described?  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Are soils described, including their physical capacity to accept nutrient applications?   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Is nutrient testing of soils and manure required, and testing procedures described?   |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Is a recordkeeping system included that covers soil and manure tests, application of the solid and liquid components of the manure, cropping, and other significant factors and practices?  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Are the periods and conditions clearly described when dairy nutrients can be safely and agronomically applied?  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Are the periods and conditions clearly described when dairy nutrients should not be applied?  |

A dairy nutrient management plan was submitted for approval by \_\_\_\_\_  
*name of dairy or producer*

on \_\_\_\_\_  
*date*. The plan was  approved  not approved on \_\_\_\_\_  
*date* by the

Board of Supervisors of the \_\_\_\_\_  
*name of district* Conservation District.

\_\_\_\_\_  
*conservation district signature and title*

## **Instructions:**

### **Who approves the DNMP**

The conservation district board approves the Dairy Nutrient Management Plan at a public board meeting. (It is assumed the board will rely upon the technical expertise of district and NRCS staff in deciding to approve or not approve the DNMP.)

Only the local conservation district can approve a DNMP. Even if a dairy is located in a district that is having dairy planning done by staff from another district, it is the local district that must approve and certify DNMPs for dairies within their boundaries.

### **Plan format**

If the plan was written prior to November 1, 1998, it need not follow the format adopted by the Washington State Conservation Commission, but it must contain all other elements to be approved.

### **Pre-existing structures**

If pre-existing structures or systems are used to manage nutrients and you are unsure how to proceed, first evaluate whether the structures or systems appear to be functioning correctly, and whether they pose health or safety risks. Document your evaluation thoroughly. Seek additional technical counsel from NRCS or a licensed engineer as needed.

If the structures or systems appear to be functioning correctly and do not pose health or safety risks, document them thoroughly in the plan and proceed with the rest of the approval checklist.

If proper functioning is in question, or health or safety risks exist, consult with your NRCS partners or a licensed engineer. The best situation would be where the producer can provide documentation indicating the structures or systems were designed and implemented to NRCS standards and specifications. For example, if ACP cost-share was used to implement the practice, it is likely such documentation exists. The DNMP will need to include requirements to repair, upgrade, or replace the older structures or systems if proper functioning cannot be determined, or if health or safety risks exist. The district cannot approve a plan until these components are included in the plan.

### **Written manure management agreements**

If nutrients must be exported from the dairy farm to balance nutrients on the farm, written manure management agreements between the producer and person(s) receiving the nutrients are required. Verbal and/or handshake agreements are not sufficient.

### **Send a copy to...**

When the approval checklist has been completed, signed and dated by the district, the district should send a copy to:

Washington Department of Ecology  
Water Quality Program  
PO Box 47600  
Olympia, WA 98504-7600  
Attn: Ken Koch

**CHECKLIST FOR CONSERVATION DISTRICT CERTIFICATION OF  
FULLY IMPLEMENTED  
DAIRY NUTRIENT MANAGEMENT PLAN**

|   |
|---|
| <b>OPERATOR:</b> _____  |
| <b>Plan Date:</b> _____ <b>Operator Certification Date:</b> _____   |
| Note: If any of the below determinations for this plan is "No", then the plan will require modification prior to conservation district concurrence with the producer's certification of implementation. |

**Nutrient Balance**

**1. Livestock Animal Units**

- a. Animal units planned for: \_\_\_\_\_  
 b. Current animal units: \_\_\_\_\_

| Yes                      | No                       | N/A                      |   |
|--------------------------|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Additional animal units do not exceed the capacity of the cropland base to utilize the additional nutrients                   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The additional AUs do not generate waste during the non-application period in excess of the storage facility design capacity. |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The additional AUs do not materially affect the nutrient or storage provisions of the plan.                                   |

| Yes                      | No                       |   |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <b>DETERMINATION</b>  |
| <input type="checkbox"/> | <input type="checkbox"/> | <b>The Livestock Animal Units are within the parameters established for this plan</b> |

|                |                    |                        |
|----------------|--------------------|------------------------|
| <b>Recheck</b> | <b>Date:</b> _____ | <b>Initials:</b> _____ |
|----------------|--------------------|------------------------|

**2. Cropland**

- a. Cropland base called for in the plan:  
 Grass silage \_\_\_\_\_ ac, Corn Silage \_\_\_\_\_ ac, Pasture \_\_\_\_\_ ac  
 b. Cropland base at present  
 Grass silage \_\_\_\_\_ ac, Corn Silage \_\_\_\_\_ ac, Pasture \_\_\_\_\_ ac

| Yes                      | No                       | N/A                      |   |
|--------------------------|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The ratio of corn to grass land provides nutrient (N) balance for the farm.                       |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | New fields substituted for previous, provide equivalent yields for nutrient use and farm balance. |

| Yes                      | No                       |   |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <b>DETERMINATION</b>  |
| <input type="checkbox"/> | <input type="checkbox"/> | <b>The cropland acreage is within the parameters established for this plan.</b> |

|                |                    |                        |
|----------------|--------------------|------------------------|
| <b>Recheck</b> | <b>Date:</b> _____ | <b>Initials:</b> _____ |
|----------------|--------------------|------------------------|

**3. New Land.**

| Yes                      | No                       | N/A                      |   |
|--------------------------|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The new land that is replacing previously leased/rented land has a current nutrient management specification.   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | The new land supports the same crop yields and crop nutrient requirements as previous land.   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Site conditions on the new land support waste application when called for in the plan (flood hazard, leaching or runoff potential, odor concerns etc) |

| Yes                      | No                       |   |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <b>DETERMINATION</b>  |
| <input type="checkbox"/> | <input type="checkbox"/> | <b>New land added to the farm operation through lease, rental, purchase or other arrangement has been incorporated into the nutrient management plan.</b> |

|                |                    |                        |
|----------------|--------------------|------------------------|
| <b>Recheck</b> | <b>Date:</b> _____ | <b>Initials:</b> _____ |
|----------------|--------------------|------------------------|

**STRUCTURES AND FACILITIES**

**4. Confinement areas, holding areas or other livestock facilities**

| Yes | No | N/A |   |
|-----|----|-----|---|
|     |    |     | Additional facilities have been inventoried and are incorporated into the existing plan |
|     |    |     | New location of facilities do not contribute contaminated runoff to a water body.       |
|     |    |     | Expanded confinement area does not contribute excess water to the storage facility.     |
|     |    |     | The confinement/holding areas are managed per the existing plan.                        |

| Yes | No | <b>DETERMINATION</b>  |  |
|-----|----|---|--|
|     |    | <b>Any changes in location or modification of existing animal confinement areas, holding areas or other livestock facilities has been incorporated into the plan.</b> |  |

|         |       |           |
|---------|-------|-----------|
| Recheck | Date: | Initials: |
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**5. Collection, handling and treatment**

| Yes | No | N/A |   |
|-----|----|-----|---|
|     |    |     | The new system does not add additional water, unaccounted for in the original plan.         |
|     |    |     | The new system does not contribute contaminated runoff to a water body.                     |
|     |    |     | Land application of separated solids is specified in the existing plan.                     |
|     |    |     | Changes to the collection, handling and treatment components comply with the original plan. |

| Yes | No | <b>DETERMINATION</b>   |  |
|-----|----|--|--|
|     |    | <b>Changes to the methods of collection, handling or treatment of manure is incorporated into this plan.</b> |  |

|         |       |           |
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**6. Farmsteads and animal feeding or housing facilities**

| Yes | No | N/A |  |
|-----|----|-----|--|
|     |    |     | Inventory and plan for the new farmstead is completed.       |
|     |    |     | Inventory of the new barn/housing facility is complete.      |
|     |    |     | Addition of farmstead/housing has been included in the plan. |

| Yes | No | <b>DETERMINATION</b>   |  |
|-----|----|--|--|
|     |    | <b>Additional farmsteads, animal housing or feeding facilities have been included in the plan.</b> |  |

|         |       |           |
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| Recheck | Date: | Initials: |
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**7. Waste Storage Facilities Operation and Maintenance**

| Yes | No | N/A |   |
|-----|----|-----|---|
|     |    |     | No Damaged dikes ( ruts, eroded banks, cattle damage, settling, trees on dike )               |
|     |    |     | Adequate freeboard maintained   |
|     |    |     | Safety measures (fencing, warning signs, pumpwell lids, etc) in place.                        |
|     |    |     | Dike seeding/vegetation adequate to protect structure ( If "no", describe deficiency: _____ ) |
|     |    |     | No Evidence of overtopping of dikes or structure  |
|     |    |     | No excessive solids/sediment buildup in the facility  |
|     |    |     | Structure is operated and maintained according to requirements                                |

| Yes | No | <b>DETERMINATION</b>  |  |
|-----|----|---|--|
|     |    | <b>Waste storage facility operation and maintenance complies with the plan and practice specifications.</b> |  |

|         |       |           |
|---------|-------|-----------|
| Recheck | Date: | Initials: |
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**8. Storage Time**

Required Storage time: \_\_\_\_\_ months  
 Actual Storage time: \_\_\_\_\_ months

| Yes | No | N/A |   |
|-----|----|-----|---|
|     |    |     | Increased livestock accounted for with adequate waste storage time and volume       |
|     |    |     | Additional surface water does not enter the facility from roof or confinement areas |
|     |    |     | Rainwater diversion practices maintained  |
|     |    |     | Other issues (explain) _____  |
|     |    |     | The system provides planned for storage time  |

| Yes | No | <b>DETERMINATION</b>  |  |
|-----|----|---|--|
|     |    | <b>The waste storage facilities accommodate any changes to the livestock numbers or livestock facilities without adversely affecting the required waste storage time.</b> |  |

|         |             |                 |
|---------|-------------|-----------------|
| Recheck | Date: _____ | Initials: _____ |
|---------|-------------|-----------------|

**9. Waste Distribution System**

| Yes | No | N/A |  |
|-----|----|-----|--|
|     |    |     | System provides for application to land parcels specified in plan (if "no" explain): _____ |
|     |    |     | All distribution system components are functional and operated according to the plan.      |

| Yes | No | <b>DETERMINATION</b>   |  |
|-----|----|--|--|
|     |    | <b>The waste distribution system functions properly and is operated and maintained according to the plan and practice specifications</b> |  |

|         |             |                 |
|---------|-------------|-----------------|
| Recheck | Date: _____ | Initials: _____ |
|---------|-------------|-----------------|

**10. Waste Collection and Handling System**

| Yes | No | N/A |   |
|-----|----|-----|---|
|     |    |     | All distribution system components are functional and operated according to the plan. (if "no", specify): _____ |
|     |    |     | _____   |
|     |    |     | _____   |

| Yes | No | <b>DETERMINATION</b>  |  |
|-----|----|---|--|
|     |    | <b>The waste collection and handling system functions properly and is operated and maintained according to the plan and practice specifications</b> |  |

|         |             |                 |
|---------|-------------|-----------------|
| Recheck | Date: _____ | Initials: _____ |
|---------|-------------|-----------------|

**LAND TREATMENT/MANAGEMENT PRACTICES**

**11. Vegetative Practices**

| Yes | No | N/A |   |
|-----|----|-----|---|
|     |    |     | Filter strips maintained according to plan and specification, if "no", explain:<br>_____<br>_____             |
|     |    |     | Tree/shrub practices maintained according to plan and specifications, if "no", explain:<br>_____<br>_____     |
|     |    |     | Relay Crops/cover crops established according to plan and specifications, if "no", explain:<br>_____<br>_____ |

| Yes | No | <b>DETERMINATION</b>  |  |
|-----|----|---|--|
|     |    | <b>Vegetative practices specified in the plan are installed and performing their intended function.</b> |  |

|         |       |           |
|---------|-------|-----------|
| Recheck | Date: | Initials: |
|---------|-------|-----------|

**12. Livestock Exclusion**

| Yes | No | N/A |  |
|-----|----|-----|--|
|     |    |     | Livestock only have access to water bodies where specifically provided by plan |
|     |    |     | Exclusion from in-stream crossings is maintained                               |
|     |    |     | Fencing functional   |
|     |    |     | Livestock water facilities (troughs, nose pumps, etc) are functional           |
|     |    |     | All livestock facilities are functioning per plan                              |

| Yes | No | <b>DETERMINATION</b>   |  |
|-----|----|--|--|
|     |    | <b>Livestock Exclusion practices specified in the plan are installed and performing their intended function.</b> |  |

|         |       |           |
|---------|-------|-----------|
| Recheck | Date: | Initials: |
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**13. Discharges or Potential Discharges**

| Yes | No | N/A |   |
|-----|----|-----|---|
|     |    |     | Field review of the farmstead and cropland did not disclose any discharges or potential discharges, either newly created or not identified during initial inventory, that would affect water bodies and would cause this operation to potentially be in violation of state or federal law |
|     |    |     | Discharges or potential discharges are identified as described: _____<br>_____<br>_____   |

| Yes | No | <b>DETERMINATION</b>  |  |
|-----|----|---|--|
|     |    | <b>All discharges or potential discharges that could transport sediment, organic matter, nutrients or bacteria to surface or ground water are adequately addressed in this plan</b> |  |

|         |       |           |
|---------|-------|-----------|
| Recheck | Date: | Initials: |
|---------|-------|-----------|

|                                |             |
|--------------------------------|-------------|
| <b>Checklist completed by:</b> |             |
| _____                          | Date: _____ |
| Technician                     |             |