

CONTINUING EDUCATION REQUIREMENTS FOR CAFO OPERATORS

Managing an animal feeding operation (AFO) using best management practices means staying informed regarding current regulatory requirements and the latest technology, equipment, management, treatment and beneficial-use relating to waste and wastewater. All personnel involved in managing AFOs or concentrated animal feeding operations (CAFOs) need current information in order to make and manage plans that effectively safeguard groundwater and surface water quality and minimize offsite odor. Continuing education (CE) training is one way to stay up to date. It is required in Alabama for CAFOs, and while not required for AFOs, it is very worthwhile in helping AFOs ensure that their operations continue to meet applicable regulatory requirements.

What are the CE requirements?

Under Alabama Department of Environmental Management (ADEM) regulations, CAFO owner/operators of proposed or existing registered CAFO facilities are required to attend annual continuing education training. As of April 1, 1999, all CAFO operators are required to complete (as determined by ADEM) up to sixteen hours of **approved** group or individualized training within a year of registering as a CAFO. Every year thereafter, CAFO registrants must complete (as determined by ADEM) up to eight hours of refresher training.

Currently (July 2005), a minimum of **twelve hours of initial training** and **six hours of annual refresher training** has been established for CAFO operators. Proof of continuing education session attendance is required to be submitted each year with the annual CAFO re-registration. Deadlines for obtaining and submitting proof of training credits may be extended by ADEM on a programmatic, commodity type, or individual facility basis if the scheduling or availability of training opportunities is significantly restricted due to bio-security concerns, natural disaster, etc.

A CAFO operator choosing not to attend and document the required continuing education training is required to submit, in addition to any application fee if required, a substantial "Greenfield" fee with the *initial* registration application and with each following *annual* re-registration request that is submitted without meeting the continuing education requirements. In those cases, ADEM may schedule a comprehensive on-site facility evaluation as part of approval of the registration or re-registration request.

Who provides CE training?

Typically, members of the Alabama Cooperative Extension System (ACES) and the Natural Resources Conservation Service (NRCS), in cooperation with ADEM, Soil & Water Conservation Districts (SWCD), and Alabama Department of Agriculture and Industries (ADAI), present AFO/CAFO CE training. The Alabama Farmers Federation, Alabama Poultry and Egg Association, and other interested organizations co-sponsor some of this training.

Operators/organizations that wish to arrange training that will count toward the ADEM required CAFO CE requirements are encouraged to contact ACES. AFO/CAFO training events are publicized through ACES and NRCS offices, generally with the assistance of sponsoring organizations and their newsletter/magazine, etc.

How do I know how many Continuing Education Units (CEU) a particular training class or event qualifies for?

Training should address or touch on animal waste management issues, AFO/CAFO NPDES compliance, water quality or other environmental related topic. Some portions of a training event or

class may potentially qualify for partial credit of some amount (an hour or more) if it touches on in some substantive way these topics.

It is the CAFO operator's responsibility to ensure that the topic and direct contact time qualify for CAFO training credit, and to retain documentation of completed training. Persons or organizations that have questions regarding whether a training topic qualifies partially or fully for credit are encouraged to contact the ACES AFO/CAFO training coordinator or ADEM for assistance.

How do I get credit for attendance?

Documentation of completed continuing education training is required to be retained in the operator's records and submitted during the CAFO annual re-registration process. Training event attendees provide their name, address and CAFO registration number on an event attendance sheet and indicate their request for credit. The sponsor of the training event forwards this sheet to the ACES AFO/CAFO training coordinator.

The ADEM-authorized AFO/CAFO "Certification of Training" certificate will be issued and mailed or otherwise made available within two weeks after the event to the requesting CAFO or AFO operator for every approved training event as described above **when the necessary information is provided to the ACES AFO/CAFO training coordinator.** The certificates will show the training event subject and credit hours awarded. The CAFO operator should bring the original certificates when registering or during the annual re-registration visit so that copies can be retained in the local SWCD file.

CCEC credits are based on direct contact time between the operator and the trainer/professional covering approved topics, and not the meeting length. Time spent by an agency professional assisting the operator to respond to an ADEM enforcement action is not eligible as CCEC credits.

If needed, duplicate CCEC records can be obtained for **training coordinated through the ACES AFO/CAFO training coordinator.** If training is not coordinated through the ACES AFO/CAFO training coordinator, the operator should contact the individual conducting the ADEM-approved training to ensure that duplicate records will be made available if needed.

For **individual** training, the CAFO operator can satisfy the documentation requirement by retaining one of the following:

- Completed copy of the ACES/AU Form R-10 *Recording Alabama AFO/CAFO Resource Agency On-Farm Visits For AFO/CAFO Continuing Education.*
- A letter from the cooperating resource agency documenting who was trained (operator name and CAFO registration number), the approved training subject, the length (direct contact time), date and time of training session, and name of the approved instructor or sponsoring organization.
- Letter from an ADEM recognized group/organization documenting direct individual participation time in ADEM accepted watershed meetings, nonpoint source projects, watershed improvement/protection, etc.
- ADEM-approved AFO/CAFO "Certification of Training" certificate documenting the completion of any ACES internet online (www.aces.edu/aawm) animal waste management training course (including WebCT Certified Animal Waste Vendor (CAWV) training).

It is a violation of the ADEM AFO/CAFO rules if a CAFO Operator does not obtain and submit certification of the *initial* and *annual* training/education or pay the additive "Greenfield" fee.

What kind of training is offered?

The goal of this continuing education is to ensure that AFO/CAFO operators/owners have access to the most current information they need to meet waste management requirements, protect Alabama's water and air quality, and be aware of environmental topics that might affect their operation. Individualized training may be available by approved ACES, ADAI, SWCD, or NRCS specialists, agents or qualified employees and **only direct contact time related to approved topics will qualify for credit with approved documentation**. Subjects covered in scheduled training will vary, and operators should choose training most relevant to their operations.

Topics covered may include many of the following:

- General Best Management Practices (BMPs)
- Good "housekeeping" recommendations
- NRCS technical standards and guidelines
- ACES and NRCS recommendations
- Emergency and natural disaster management plans
- Waste Management System Plan (WMSP) preparation, construction and implementation
- Certified Crop Advisor (CCA) training
- Qualified Credentialed Professional (QCP) certification
- Compliance with applicable State and federal environmental regulations
- CAFO registration
- ADEM inspections, compliance action and potential monetary penalties
- Other ADEM topics affecting animal agriculture or environmental quality such as water quality standards, watershed Total Maximum Daily Loads (TMDLS), CWA Section 303d listing, nonpoint source management projects, etc.
- ADAI requirements/guidelines including biosecurity
- Certified Animal Waste Vendor (CAWV) program
- Applicable AFO/CAFO buffers/setbacks
- Land application requirements and restrictions
- ADEM/National Weather Service "Forecast" and "Farmer's Weather Map"
- Facility self-inspection, annual QCP evaluation, 5 year PE evaluation requirements
- Odor management/minimization
- Water well siting, construction, and maintenance standards
- Liquid-waste confinement building and structure site preparation and construction standards
- Spill prevention control and countermeasures (SPCC)
- Surface water and groundwater protection; evaluation and sampling if needed
- Comprehensive waste and wastewater system management and land application
- Nutrient budgeting
- Animal feed/diets/supplements
- Energy audits
- Climate change
- Water collection, filtering, and reuse
- Dead animal disposal, composter, freezer, and incinerator siting and management
- Emergency animal mortality burial approval
- New and innovative alternative technologies

- Necessary record keeping requirements
- Response to emergency situations (power failure, system failure, unpermitted discharge, etc.) and natural disasters
- Pollution prevention
- ADEM NPDES construction stormwater registration and BMP requirements for construction disturbances 1 acre and greater
- **OTHER TOPICS consistent with the AFO/CAFO program or other environmental topics acceptable to ADEM or the ACES training coordinator**

If you have any other topics that you would like to request to be added to the above list, to request a copy of training records for training coordinated by the ACES AFO/CAFO Training Coordinator, or if you have any questions/concerns regarding the CAFO Continuing Education program, please do not hesitate to contact:

Alabama Cooperative Extension System
Auburn University
cafoceu@auburn.edu
www.aces.edu/anr/aawm/education.php

OR

Office of Field Services
Field Operations Division
Alabama Department of Environmental Management
334-394-4311
fieldmail@adem.state.al.us
www.adem.state.al.us/programs/water/cafo.cnt