

Record Keeping for **DAIRY OPERATIONS** in Georgia

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Confined animal feeding operations (CAFOs), depending on size, are required to have a state or federal permit. Operations that have 300-1,000 animal units (AU), which is equal to 200-699 dairy cows or 300-999 heifers, must have a state issued Land Application System (LAS) permit. Operations that have more than 1,000 AU, equivalent to 700 dairy cows or 1,000 heifers, must have a federally issued National Pollutant Discharge Elimination System (NPDES) permit. With both of these permits, operations are required to have a Comprehensive Nutrient Management Plan (CNMP) written by a certified planner. The CNMP requires operations to keep records that document adherence to its nutrient management plan. Record keeping requirements vary slightly between LAS and NPDES permits, so it is important for operation managers to know what permit the operation has and what specific records are required.

Determining Record-Keeping Requirements

Reading the regulations, rules and permits is one way to determine what records to keep; however, it is often difficult to find the specific record-keeping information. Permitted operations must have a nutrient management plan that contains a section on record keeping. All permitted operations are subject to regulatory inspections, and since inspectors have very specific forms that they follow for farm inspections, the record requirements on the inspection forms are another tool to help determine what records to keep.

The Georgia Department of Agriculture develops separate inspection forms for LAS-permitted facilities and NPDES-permitted facilities, so it is important to review the correct form when determining what records to keep. Inspection forms are occasionally revised, so it is recommended to check for updated forms annually. Inspection forms are available through University of Georgia Animal Waste Awareness in Research and Education (AWARE) website www.agp2.org/aware/.



Records Needed for Permitted Facilities

(from program year 2009 LAS and NPDES inspection forms)

Records must be kept for a minimum of three years and be available on-site.

- Copy of Permit and CNMP
- Copy of operator's certification certificate
- Documentation of continuing education credit received
- **Daily** rainfall records
- **NPDES - Weekly** log of waste water impoundment liquid level
- **LAS - Monthly** log of waste water impoundment liquid level
- **NPDES - Weekly** inspections of manure storage/handling structures and runoff management
- **LAS - Monthly** inspections of manure storage/handling structures and runoff management
- Records of all manure applications including date, rate, crop and method of application
- Crop yield records
- **Annual** application equipment calibration records
- Rental/lease agreements for manure or waste water applied to land in the CNMP that does not belong to the farm owner
- Records of any off-farm transport of manure, including date, amount, nutrient analysis and recipient's name and address
- Sample collection records including date, time, exact location and person responsible for manure, waste water, soil and monitoring well sample collection
- **NPDES - Semiannual** laboratory analysis of manure, waste water and monitoring well water, and annual soil sample analysis
- **LAS - Annual** laboratory analysis of manure and soil samples





Annual soil sample collection and analysis is critical to determine proper nutrient application rates. Copies of annual soil sample analysis should be kept in operation records.

Types of Records

Records can be kept in several different formats, from simple calendars to complicated computer software programs. For operations that need assistance with record keeping, the AWARE Web site has several record-keeping forms available, including printable forms for lagoon and manure storage inspections, continuing education credits, rental/lease agreements, off-farm manure transport, and manure, water and soil sample submission.

Also available is downloadable manure application record-keeping software for liquid, slurry and solids land applications. The software can be used with any computer that has a spreadsheet program, or the forms can be printed and filled in by hand. The easiest way to keep daily rainfall records is to download the rainfall data from the nearest weather station at www.georgiaweather.net. Your local county Extension office can also help with record keeping.

Benefits of Keeping Records

There are several benefits to keeping records. First, and most obvious, is to be in compliance with state and federal regulation and permit requirements. However, records have other benefits as well. Keeping documentation of soil and manure nutrients, land application of nutrients, and crop yields can assist in farm management decisions that will improve profitability. Another benefit of keeping records is to document environmental stewardship. Most producers are doing a great job with nutrient management, but without records they have no proof. Possibly the greatest benefit of record keeping is legal protection. As urban areas rapidly expand into rural farming communities, the

frequency of nuisance lawsuits pertaining to odors, insects and water pollution from confined livestock operations has increased significantly. Therefore, to some extent, records proving compliance with all state and federal regulations can provide legal protection.

Summary

Records are an asset as well as a regulatory requirement for permitted Georgia dairy operations. Although accurate record keeping takes a little additional time and effort, in some cases records (or a lack of records) can determine whether or not an operation stays in business. Without records there is no way to prove that an operation follows its nutrient management plan or practices good environmental stewardship. Records are sometimes the only defense producers have for their agricultural practices.

Record keeping requirements can change over time, so check for updated inspection forms on the AWARE Web site www.agp2.org/aware/. Record keeping can be a simple process. Information and record-keeping forms are available at the AWARE Web site, and assistance is available through local county Extension offices by calling 1-800-ASK-UGA1.



Records should be kept for all land application events, including date, rate, crop and application method; equipment should be calibrated annually.



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