



# TIMELY INFORMATION

## Agriculture & Natural Resources & Forestry

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DEPARTMENT OF BIOSYSTEMS ENGINEERING, AUBURN UNIVERSITY, AL 36849-5626

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## CONTINUING EDUCATION REQUIREMENTS FOR CAFO OPERATORS<sup>1</sup>

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Managing an animal feeding operation (AFO) using best management practices means staying informed regarding current regulatory requirements and the latest technology, equipment, management, and disposal methods 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 reduce odor. Continuing education (CE) training is one way to stay up to date. It is required by law in Alabama for CAFOs and while not required for AFOs, is very worthwhile in helping AFO owners ensure that their operations continue to meet all requirements for waste management. This publication explains how the AFO/CAFO continuing education program works, how you can benefit from it, and what you should do to make sure you comply with the law.

### What are the CE requirements?

Under Alabama Department of Environmental Management (ADEM) regulations, all managing owners/operators and on-site supervisors 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 (**January 2006**), a minimum of **twelve hours of initial training** and **six hours of annual refresher training** are required for CAFO operators. **After completing annual training, up to 6 hours of additional training completed in the current year can be carried over for credit to the next year.** 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.

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<sup>1</sup> This information was reviewed and approved by Richard Hulcher, Chief, Mining & Non-Point Section, Field Operations Division, ADEM, January 2006.

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 application that is submitted without meeting the continuing education requirements. In those cases, ADEM will 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 and Natural Resources Conservation Service (ACES-NRCS) Waste Management Education Team, in cooperation with ADEM, Soil & Water Conservation Districts (SWCD), and Alabama Department of Agriculture and Industries (ADAI), present AFO/CAFO Continuing Education 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 continuing education credits (CCECs) are encouraged to contact the AFO/CAFO training coordinator, ACES’s Biosystems Engineering Department, Auburn University, at (334) 844-3542 or by email at [tysonw@auburn.edu](mailto:tysonw@auburn.edu) for additional information and assistance. 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 CCECs a particular training class or event qualifies for?

Training must address animal waste management issues or AFO/CAFO NPDES compliance. 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 animal waste management issues of AFO/CAFO NPDES compliance. For example, partial credit would be reasonable for a seminar on ventilation techniques / management (odor), technology/management of watering systems (litter moisture/management), etc.

**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 AFO/CAFO training coordinator, ACES’s Biosystems Engineering Department, Auburn University, at (334) 844-3542 or by email at [tysonw@auburn.edu](mailto:tysonw@auburn.edu) 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 who uses it to generate training event credit attendance certificates. All attendees **who request credit** will be mailed CCEC training certificates of attendance for their personal records.

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* (<http://www.aces.edu/department/aawm/onfarmceform4-14-05.pdf>).
- 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](http://www.aces.edu/aawm)) animal waste management training course (including WebCT Certified Animal Waste Vendor (CAWV) training).

It is a significant 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 all personnel involved in managing or working at an AFO/CAFO have access to the most current information they need to meet waste management requirements and protect Alabama's water and air quality. 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 classes 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
- 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 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:

AFO/CAFO Training Coordinator  
 ACES's Biosystems Engineering Department  
 Auburn University  
 334-844-3542  
[tysontw@auburn.edu](mailto:tysontw@auburn.edu)

OR

Mining & Nonpoint Source Section  
 Field Operations Division  
 Alabama Department of Environmental Management  
 334-394-4311  
[mnps@adem.state.al.us](mailto:mnps@adem.state.al.us)

**(Footnotes)**

<sup>1</sup> This information was reviewed and approved by Richard Hulcher, Chief, Mining & Non-Point Section, Field Operations Division, ADEM, January 2006.