IDAHO STATE DEPARTMENT OF AGRICULTURE
DAIRY MOU REPORT
APRIL 23, 2007

At the end of 2006, Idaho had 683 dairy farms - a net loss of 38 dairies from 2005. Average herd size increased from 657 mature animals per farm in 2005 to 696 in 2006. Total milk production was over 10.89 billion pounds up 7.2% from 2005. Average milk price was approximately $11.89 per hundred weight down from $13.50 in 2005. Farm gate receipts were 1.27 billion, down from 1.37 billion in 2005. The Department estimates the 2007 milk production will increase approximately 5% over 2006. Several dairymen have gone through the county siting approval process and are under construction. Numerous other dairy site proposals have been approved by county governments. The majority of these approvals continue to be in Minidoka and Cassia counties. A few counties in Magic Valley have been reviewing modifications of their ordinances for tighter control of the livestock industry. Brewster Cheese has purchased the Kraft plant in Rupert and plan to open in the fall of 2007.

YEAR	NUMBER OF FARMS	POUNDS OF MILK (BILLIONS OF LBS.)	MATURE DAIRY COWS (IN THOUSANDS)	AVERAGE HERD SIZE
1991	1952	2.87	178	91
1992	1825	3.09	183	100
1993	1248	3.18	189	151
1994	1217	3.71	208	171
1995	1179	4.17	232	197
1996	1150	4.7	256	223
1997	1074	5.15	272	253
1998	980	5.7	301	307
1999	930	6.453	332	357
2000	894	7.189	354	395
2001	837	7.757	377	450
2002	788	8.155	390	495
2003	762	8.77	412	540
2004	737	9.09	435	590
2005	721	10.15	474	657
2006	683	10.89	476	696
Statistics from ISDA & estimates from USDA Statistical Reporting				

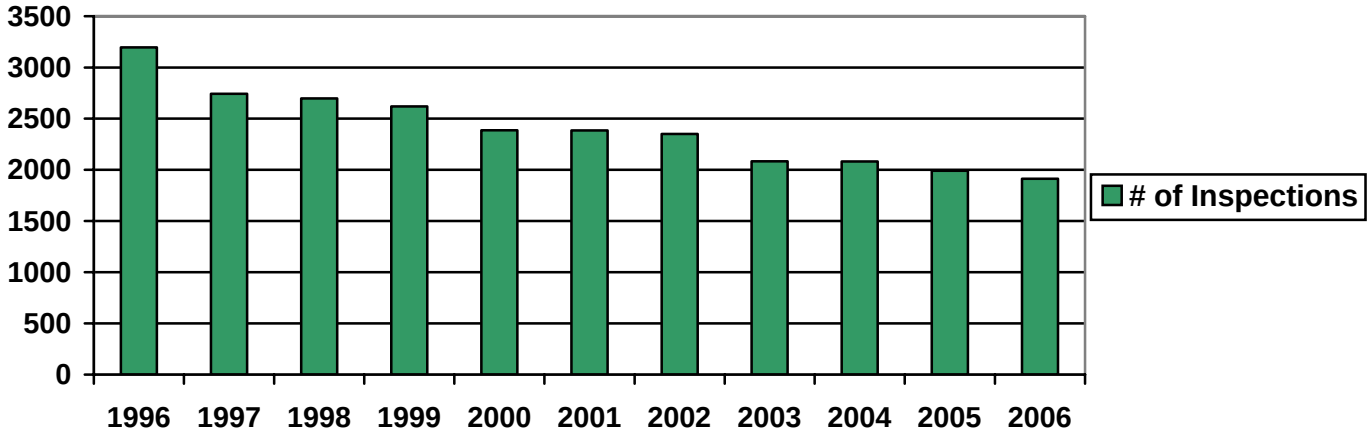
TOP 10 MILK PRODUCING STATES

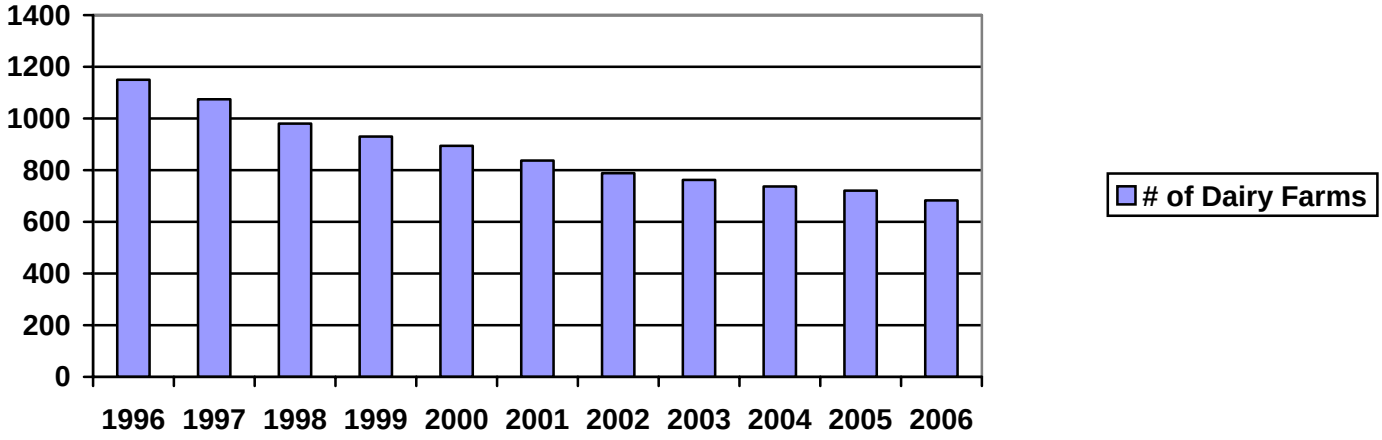
STATE	2005	2006	CHANGE IN %
California	37,548	38,830	3.4
Wisconsin	22,864	23,398	2.3
New York	12,077	12,045	-0.3
Idaho	10,156	10,895	7.2
Pennsylvania	10,514	10,742	2.3
Minnesota	8,200	8,364	2.1
New Mexico	6,951	7,638	9.9
Texas	6,442	7,145	10.9
Michigan	6,673	7,100	5.2
Washington	5,608	5,464	-2.6

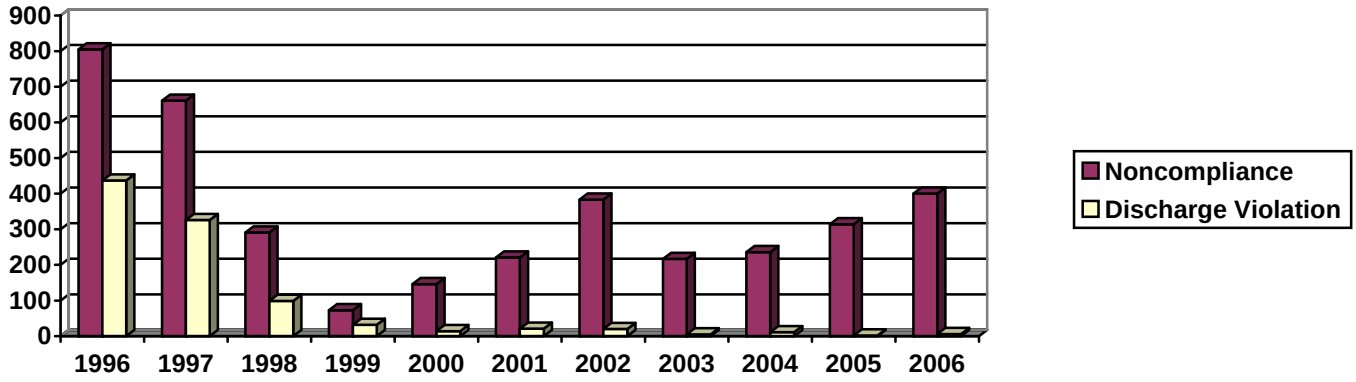
WASTE INSPECTION DATA

During the ten-year history of the MOU, 1996 through 2006, ISDA conducted 26,445 dairy farm waste inspections. A total of 3,747 noncompliance violations and 973 discharge violations were issued.

	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006
Non-compliance	805	661	291	73	146	221	383	217	236	314	400
Discharge	437	326	99	32	14	21	20	5	11	2	6
Total Inspections	3196	2742	2697	2619	2386	2385	2350	2083	2082	1991	1913







During 2006 the number of noncompliance violations and discharge violations increased from 2005. In 2006, ISDA cited 7 dairy farms resulting in civil penalties of $69,900.00 for violations of the Rules Governing Dairy Waste. Penalties for dairy waste violations are generally resolved through a settlement meeting process. The process is summarized through a Stipulation, Agreement and Consent Order signed by the violator and the ISDA director.

This process involves the dairyman, dairyman's attorney (if wanted), ISDA investigators, the Dairy Bureau Chief, and a Deputy Attorney General. If an agreement can not be reached by the parties, a formal hearing is held. When assessing a dairy waste penalty, ISDA uses a matrix as a guide in determining the appropriate penalty for the violation.

The Bureau continues to receive numerous inquiries regarding state dairy waste requirements. The dairy industry, and perhaps to a greater degree the public are unclear with provisions outlined in the Rules Governing Dairy Waste. The primary inquiries for 2006:

a. The MOU hasn't stopped odor, air emission problems, or flies
b. Manure stockpiling on pivot corners or 3rd party locations.
c. Solids application during winter months or on frozen or snow covered ground.
d. Incorporation requirements of livestock waste on dairy owned or 3rd party owned acres.
e. Set back requirements from County & ISDA.
f. What is excessive manure on the road?
g. Over application, multiple applications.
h. Straight effluent, when application is okay.
i. Land application requirements of livestock waste in proximity to wells, laterals, residences, roadways.
j. Why aren't OnePlan NMP's available on request?
k. Land application of effluent under provisions outlined in NMP's.
l. Soil testing requirements.
m. Record keeping requirements for nutrient management
n. Waste run off into barrow pits.
o. County authorization for waste systems.

In January 2006 ISDA conducted a fly-over in Southwest Idaho. The fly-over covered north and west of Cambridge to Bruneau. The fly-over was done to determine the status of livestock operations in light of the large amount of precipitation during December 2005 and early January 2006. ISDA also conducted a fly-over of Magic Valley then east to areas around the greater Blackfoot area. The fly-overs were useful in identifying livestock facilities that had significant containment issues and helped to determine the adequacy of dairy farm containment systems professionally designed to handle recent weather conditions.

Many dairy containment systems were stretched to the limit. On the ground review of the facilities revealed a significant number of containment systems were not managed in a manner that provided optimal storage capacity. The heavy winter precipitation was a valuable lesson to better prepare for winter for some.

EPA conducted fly-overs shortly after ISDA. They identified a number of facilities already targeted by the ISDA fly-over. Perhaps a pooling of resources or sharing of data would result in a more cost effective audit of the ISDA livestock inspection programs.

Currently NRCS is modifying their Nutrient Management Standard (NMS) 590. The draft December 2006 NMS has been released for public comment. NRCS will publish their new NMS 590 Standard by August 2007. We assume the NPDES permit for Idaho will not be published until the new NMS 590 Standard is established.

ISDA has been participating with NRCS on a project to determine if "Phosphorus Indexing" may be an alternative to the current 1999 Standard. ISDA has conducted field assessments on a variety of dairy owned fields in Treasure Valley, Magic Valley, and Eastern Idaho. These assessments were submitted to NRCS for their evaluation. Currently, there is a philosophical difference between ISDA and NRCS for soil testing data on these fields. Basically, NRCS believes that actual soil tests in the 0 to 12" and 18" to 24" soil profile is needed in addition to the field assessments to determine the Phosphorus Index. ISDA believes that by utilizing the OnePlan module, theoretic soil test data could be used to model what the field by field Phosphorus Index would be. What we are trying to determine is:

1. *Can Phosphorus Indexing be used as an environmentally sound conservation practice with the modification of the P threshold?*
2. *What should the P threshold be?*
3. *What would the impacts be to Idaho agriculture and more specifically the livestock industry?*
4. *Would there be opportunity for some operators to apply livestock nutrients for certain cropping fields to meet nitrogen needs?*
5. *Can both a Phosphorus Index Standard and a Phosphorus Threshold (current 590) be in place at the same time?*

There are a myriad of Phosphorus Index Standards throughout the US. The Idaho Standard needs to allow the state to compete on a level playing field provided we can demonstrate sound environmental compliance.

WATER QUALITY TESTING

657 dairy well nitrate tests were conducted in 2006. Data from these tests are shared with ISDA water quality staff and other agencies. All >10 ppm tests are reported to DEQ. In addition, dairy farms receive written notification from ISDA. The Dairy Bureau has requested the ISDA's Water Quality Program to conduct site assessments to assist in determining nitrate source (s) on and around dairy farms that are greater than 10 ppm. The Dairy Bureau conducted 663 coliform tests on dairy well/sweet water systems in 2006. The Bureau will continue to annually test dairy wells for nitrate and coliform.

In 2005 ISDA put in place a soil sampling testing priority on dairy farms whose well water was 10 ppm or greater. This protocol was nearly completed in 2006.

High Well Nitrate Soil Results:

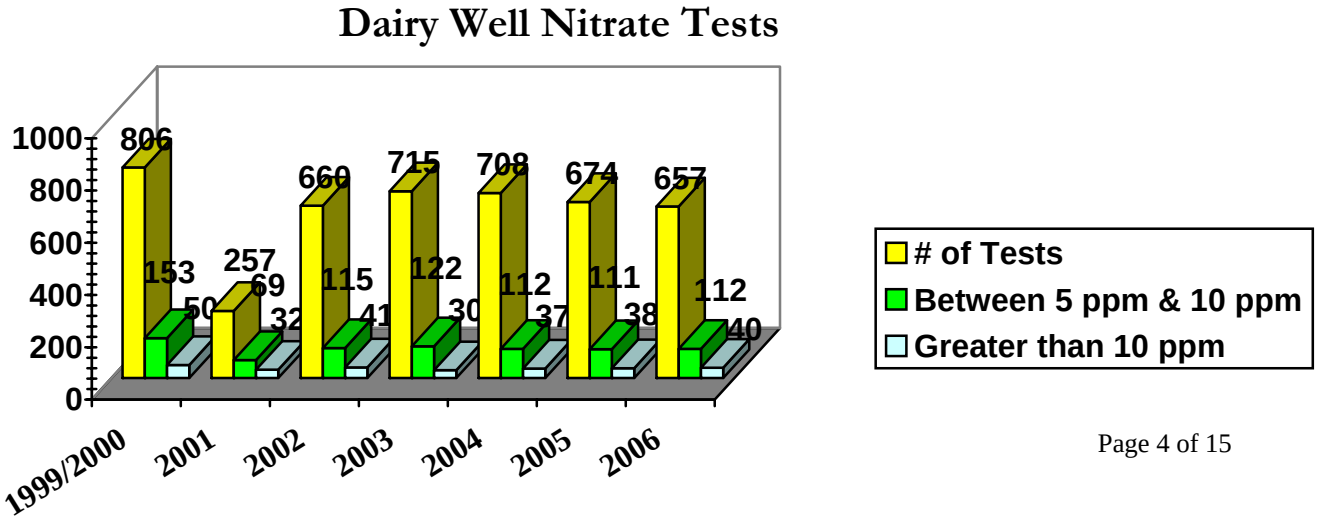
41 Facilities >10ppm

- 19,660 acres
- 15,910 acres have been sampled

397 Fields

- 271 are below P threshold-68%
- 126 are over P threshold-32%

Further information relating to ground water testing is available on our website at www.agri.idaho.gov / Environment / Water Quality / Fact Sheets & Brochures or Maps.



NUTRIENT MANAGEMENT

ISDA has sampled approximately 141,000 acres of dairy owned land since the standard was put in place. In December 2004 the Dairy Bureau started using the ISDA Quality Assurance Lab (QAL) for our soil testing results. The QAL laboratory participates in the North American Proficiency Testing certification program. Several other private labs are now participating in this soil testing certification program. Soil laboratory results prior to the certification program would have a difficult time passing legal scrutiny. Split and blind soil samples sent by ISDA to private labs prior to the certification program revealed gross testing discrepancies.

ISDA has soil sampled and tested 12,594 dairy acres in 2005. In 2006, 41,654 acres were tested. These tests were all conducted in our QAL. In April, ISDA outsourced a portion of soil sampling as a pilot project to determine if there could be a more cost effective method of sampling. The preliminary results of this project indicate that soil sampling will likely be conducted with other than ISDA staff. ISDA has developed some draft rules that would provide a "Soil Sampling Certification Program." Under this proposed program ISDA would certify soil samplers to take soil samples under protocols established in the University of Idaho Soil Sampling Guidelines.

A concern of the industry, regulators, and those agencies that established the phosphorus threshold is because of all the years of nutrient applications, several fields are now above tolerance. What will be EPA's position regarding fields currently above the phosphorus threshold under their NPDES Permits? Does the language in the 1999 or the draft NMS 590 Standard need to be modified to provide greater clarity with future manure/fertilizer applications on fields above the phosphorus threshold? Is there real environmental concern for the phosphorus threshold if runoff is not an issue?

The Dairy Bureau has a procedure in place to regulate the phosphorus threshold standard. The Bureaus' procedure is to notify producers whose field(s) are over the phosphorus threshold. The producers are informed that any fields that exceed the phosphorus threshold may only receive livestock/commercial phosphorus nutrient applications to crop uptake. Repeat violations of the 590 standard are subject to penalties outlined in the Rules Governing Dairy Waste. The enforcement of this standard has been very difficult primarily do to the past extreme variability in laboratory soil testing protocols and results. We believe an objective reasonable rule needs to be put in place that will address producer and regulatory phosphorus soil testing issues. At this time, it may be premature to address these issues because of the lack of information regarding the requirements contained in the next NRCS NMS and the NPDES Permit.

ISDA IS A REGULATORY AGENCY

The ISDA, Dairy Bureau's, regulatory authority extends significantly beyond dairy waste system design, construction, and operation. The Dairy Bureau is responsible for the inspection, sanitation and conditions that could affect quality and wholesomeness of milk and dairy products. This encompasses the inspection of dairy farms, bulk milk haulers and equipment, processors, warehouses, stores and other businesses where milk and dairy products are manufactured, stored, sold or offered for sale. In addition, ISDA, through a cooperative agreement with USDA/AMS, inspects milk processors that qualify under this voluntary program. ISDA also samples and grades milk products for USDA under this program. During 2006 the Dairy Bureau conducted 3,502 inspections and 4,041 laboratory tests to assure dairy product integrity. (See Dairy Bureau Sanitation Program pgs 14 to 16). The ISDA dairy sanitation enforcement and testing requirements are reviewed and evaluated by F.D.A. and U.S.D.A.. Testing of dairy products for quality, purity and adherence to standards of identity and composition is an important part of the program. Individual processors run various tests in ISDA approved laboratories on each producer at least once per month for bacteria, sediment and somatic cells. Each tanker load of milk received at the plant is tested for drugs. The Dairy lab continually tests milk, dairy products and environmental samples in order to detect the presence of bacteria, somatic cells, drug residues and other

health/hazardous substances. The Dairy Bureau is self-sustained by monies received from the dairy industry through licenses, mill levy (currently 2.5 mills) assessments on butterfat sold by Idaho milk producers or processed by Idaho plants and fees for services rendered by the bureau through Federal/State cooperative agreements on sampling, grading and inspection of products under the USDA program.

In addition, the Dairy Bureau is responsible for the Dead Animal Movement and Disposal Law on Idaho dairy farms. During 2006 the Dairy Bureau conducted 78 Dead Animal Movement and Disposal Inspections. The inspections resulted in 29 non-compliance violations. Two facilities were assessed civil penalties totaling $25,000.00. This inspection program has been amplified primarily due to increased dead animal pickup rates by the rendering company, closure of some landfills for receiving carcasses or increased cost for carcass disposal at landfills.

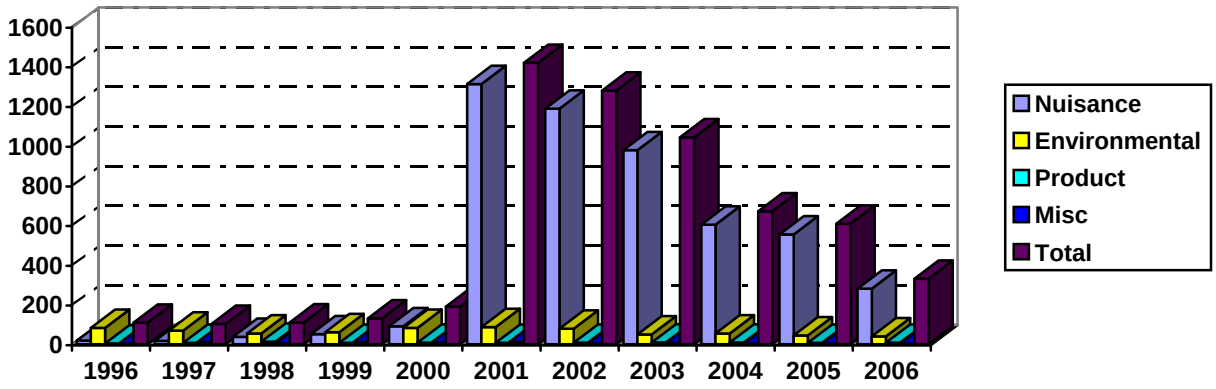
The dead animal law allows burial of deads as an acceptable means of disposal. We would prefer other acceptable means to properly dispose carcasses. We have seen renewed interest from livestock facilities and organizations to use composting as a means to properly dispose deads. ISDA has established a Dead Animal Composting Approval process to improve environmental concerns and protect against animal disease challenges. (See Mortality Composting pg 17).

The Dairy Bureau is also responsible for enforcing the 2001 Agriculture Odor Management Act on Idaho dairy farms. Since that time four dairy facilities were sited and were required to develop an Odor Management Plan (OMP). One dairy facility was subsequently found to be in violation of their OMP and was assessed a fine. The Bureau has extended a significant amount of time working with the dairy industry and in particular facilities with elevated odor situations. Millions of dollars were invested by those dairy farms with odor issues. Those expenditures have improved odor conditions significantly.

ISDA DAIRY RELATED COMPLAINTS

During 2006 the Dairy Bureau received 330 complaints:

280 nuisance
40 environmental
8 product
2 miscellaneous



On 5/3/06 the ISDA and DEQ entered into a Memorandum of Understanding to address Ammonia Emission inspections on larger dairy farms. ISDA has inspected all of these facilities (60 licensed farms) under the protocols established by DEQ rule. We anticipate approximately two plus inspections per facility a year to adequately review the BMP's used by each facility.

The Dairy Bureau also enforces provisions of Title 25 Chapter 35, Cruelty to Animals as it relates to the care and treatment of animals on dairy farms.

ISDA's mission statement is "Serving consumers and agriculture by safeguarding the public, plants, animals and the environment through education and regulation." The ISDA Dairy Bureau maintains the best way to serve consumers, agriculture and safeguard the public, animals, and the environment is to have effective, sound and objective enforcement procedures that provide wholesome dairy products for consumers and quality environmental programs. Dairymen realize that in order to preserve a way of life and continue to play a vital role in Idaho agriculture and the economic and social well-being of this state; they must be better neighbors and stewards of the land.

SUMMARY

In last two year MOU reports there were areas of concern expressed about the new NPDES permits. The same concerns exist this year. How will the new NPDES permit requirements mesh with the state inspection program and the future of the MOU? How will multi-agency regulatory responsibility provide non-conflicting enforcement as livestock operators deal with waste containment, nutrient management, odor, and air quality issues? Will increased regulatory burdens cause a decline in small livestock operations? How quickly will new technologies become a part of the industry? There are commitments by the regulated and the regulators to continually find common-sense solutions to these and other issues.

The Idaho Dairy Pollution Prevention Initiative was structured as a results oriented environmental program. In spite of all the fan-fare pro or con, the Initiative has been effective in achieving what it was originally intended to do, improve water quality.

As I reflect over the 10 year history of the initiative, most of the original key players are gone:

EPA; *Chuck Finley, Lynn McKee, Warren McFall, Bub Loiselle, (David Domingo, Carla Fromm, Joe Roberto, quasi gone),*

U of I; *Dean Falk and Ed Fiez, DEQ; Bob Lupton, Wally Corey, Kevin Beaton, Mike McMasters, Steve Kolar,*

IDA; *Lewis Eilers, Don Papenburg,*

ISDA; *hey nobody from the original left…since that time; Michael Mitchell, Jenifer Beddoes, Travis Kator, Matt Thompson, Randy Elsberry, Les Boian, Burk Cannon, Kelly Mortenson, John Bilderback, Bill "The Jersey" Shelton, Ed Neel, Diana Tews, Tami Frank, Jeff Marler, Dustin Olsen, Joe Devlin, Mary Barnett, Stephanie Schoeneger, Marty Zantman, Montessa Young, and Mary Rosen.*

There appears to be a significant attrition issue with the Dairy Bureau personnel over the course of the Initiative. Only one of the dairy staff actually retired! I am fully convinced these individuals were over worked and under paid and it had nothing to do with their supervisor being a jackass!

As I assess the new blood from the signatory parties; Toni Hardesty, Elin Miller, Jim Werntz, Bob Naerebout, Celia Gould, Greg Ledbetter, I am totally impressed with their vision and leadership. The MOU is in the hands of individuals that will guarantee continually success. It enables jackasses to die or just fade away…

Respectfully Submitted,

Marv Patten, Chief
Dairy Bureau

Idaho Department of Agriculture
Bureau of Dairying

New Waste Inspection Summary

SUMMARY SEARCH CRITERIA

Beginning Date	10/01/95
Ending Date	12/31/06
For Inspector	All
For County	All
For Plant	All
For BTU	All
For Water Basin	All
For Producer	All

WASTE INSPECTION SUMMARY

Total Waste Inspections	15423
Routine	14558
Follow-Up	136
Pre-Qualifying	63
Qualifying	258
Other	251
Complaint	157
Total Animals	7942912

WASTE INSPECTION VIOLATION SUMMARY

	NON-COMP	DISCHARGE
1a. Barn Waste Containment	236	9
1b. Corral/Facility Containment	145	38
1c. Separation System	28	2
1d. Construction Approval	107	
1e. Adequate Liquid Storage	172	
1f. Waste Facilities Well Maintained	546	
1g. Evidence of Past Discharge	77	
1h. Animals Confined From Waterways	62	3
2a. Nutrient Management Plan	178	
2a1. Crop Rotation and Yield	18	
2a2. Animal Numbers	2	
2a3. Barn Water Use	7	
2a4. Waste Export	14	
2b. Record Keeping Current	164	
2c. Liquid Application	160	35
2d. Solid Application	22	8

COMPLIANCE SCHEDULE SUMMARY

Producer with 1 or more Non-Compliance Items Checked	1940
Producer with 1 or more Discharge Violations Checked	87
Producer with Repeat Non-Compliance Box Checked	26
Producer with Discharge Insp Box Checked	11
Producer with Revoke Milk Box Checked	7
Producer with Admin Hearing Box Checked	52

Idaho Department of Agriculture
Bureau of Dairying

Old Waste Inspection Summary

SUMMARY SEARCH CRITERIA

Beginning Date	10/01/95
Ending Date	12/31/06
For Inspector	All
For County	All
For Plant	All
For BTU	All
For Water Basin	All
For Producer	All

WASTE INSPECTION SUMMARY

Total Waste Inspections	11026
Routine	10293
Follow-Up	242
Complaint	196
Review	43
Approval	193
Total Animals	3190428

WASTE INSPECTION VIOLATION SUMMARY

1a. Properly constructed and maintained milking center facility	1423
1b. Animals properly confined	194
1c. Waterways protected	740
2a. Properly designed/constructed/located	1369
2b. Adequate storage capacity	358
2c. Facility properly maintained to prevent nuisance conditions	255
3a. Adequate general description of the W/M plan available	141
3b. Are solids/liquids handled and disposed of properly	1000
3c. Appropriate schedules/rates of land application provided	36
3d. Agreement available if disposal involves other land owners	20
3e. Changes in plan since last inspection	2
3f. Evidence of a past discharge	986

COMPLIANCE SCHEDULE SUMMARY

Notices of Non-Compliance	1433
Notices of Discharge Violations	791
Repeat Notices of Non-Compliance	391
Repeat Notices of Discharge	103
Revocations of Milk Permits	89

Idaho Department of Agriculture
Bureau of Dairying

New Waste Inspection Summary

SUMMARY SEARCH CRITERIA

Beginning Date	01/01/06
Ending Date	12/31/06
For Inspector	All
For County	All
For Plant	All
For BTU	All
For Water Basin	All
For Producer	All

WASTE INSPECTION SUMMARY

Total Waste Inspections	1913
Routine	1801
Follow-Up	15
Pre-Qualifying	10
Qualifying	25
Other	44
Complaint	18
Total Animals	1381426

WASTE INSPECTION VIOLATION SUMMARY

	NON-COMP	DISCHARGE
1a. Barn Waste Containment	23	1
1b. Corral/Facility Containment	23	9
1c. Separation System	2	1
1d. Construction Approval	15	
1e. Adequate Liquid Storage	61	
1f. Waste Facilities Well Maintained	117	
1g. Evidence of Past Discharge	21	
1h. Animals Confined From Waterways	6	0
2a. Nutrient Management Plan	55	
2a1. Crop Rotation and Yield	6	
2a2. Animal Numbers	1	
2a3. Barn Water Use	3	
2a4. Waste Export	5	
2b. Record Keeping Current	31	
2c. Liquid Application	26	4
2d. Solid Application	3	0

COMPLIANCE SCHEDULE SUMMARY

Producer with 1 or more Non-Compliance Items Checked	400
Producer with 1 or more Discharge Violations Checked	14
Producer with Repeat Non-Compliance Box Checked	6
Producer with Discharge Insp Box Checked	6
Producer with Revoke Milk Box Checked	0
Producer with Admin Hearing Box Checked	0

Waste Inspection – Mature Animal Summary

County	Dairies 1-200 Animals	Dairies 201-500 Animals	Dairies 501-750 Animals	Dairies 751-1000 Animals	Dairies 1001-2000 Animals	Dairies 2000+ Animals	Total Animals
Ada County	7	8	1	3	6	1	18,110
Bannock County	6	1	0	0	0	0	724
Bear Lake County	19	0	0	0	0	0	968
Bingham County	20	9	3	1	0	1	9,623
Bonner County	1	0	0	0	0	0	70
Bonneville County	8	1	0	0	0	0	815
Boundary County	3	0	0	0	0	0	150
Butte County	0	2	0	0	0	0	500
Canyon County	16	7	4	2	8	5	34,356
Caribou County	12	1	0	0	0	0	1,030
Cassia County	16	7	2	2	8	11	54,567
Elmore County	0	0	0	1	1	4	14,200
Franklin County	56	9	2	0	0	1	11,775
Fremont County	6	0	0	0	0	0	480
Gem County	11	3	0	0	0	0	1,930
Gooding County	14	25	12	14	18	19	117,758
Idaho County	4	0	0	0	0	0	215
Jefferson County	19	3	2	1	1	1	8,977
Jerome County	5	12	9	9	19	9	70,735
Latah County	1	0	0	0	0	0	100
Lemhi County	4	0	0	0	0	0	306
Lincoln County	12	7	4	1	3	2	23,544
Madison County	4	0	0	0	0	0	285
Minidoka County	17	2	1	2	0	2	9,691
Oneida County	6	0	0	0	0	0	388
Owyhee County	6	4	0	2	1	3	17,290
Payette County	8	10	0	1	3	1	13,281
Power County	0	0	1	0	0	0	600
Teton County	9	0	0	0	0	0	548
Twin Falls County	21	16	12	5	8	11	63,937
Washington County	0	1	0	0	0	0	240
Other County	0	0	0	0	0	0	0
721 Total Producers	311	128	53	44	76	71	477,193

DAIRY BUREAU SANITATION PROGRAM

Following are totals for the various activities for the Dairy Bureau from 1-1-06 thru 12-31-06

INSPECTIONS

Grade A Dairy Farm Inspections	2,379
Manufacturing Grade Dairy Farm Inspections	131
Bulk Tanker Inspections	121
Bulk Hauler Evaluation	159
Dairy Plant Sampler Evaluation	36
Grade A Pre-Qualifying	84
Manufacturing Grade Pre-Qualifying	5
HTST Timing	303
Vat Pasteurizer Equipment Check	27
State Plant Inspections	64
USDA Plant Inspections	47
Antibiotic Investigations	68
BTU Rating	29
Plant Rating	9
Single Service Plant Rating	1
Laboratory Evaluations	35
Split Samples	4
Total Bureau of Dairying inspections performed to ensure the sanitation and wholesomeness of milk and milk products	3,502

MILK/DAIRY PRODUCTS REJECTED/CONDEMNED

Producer Excluded/adulterated/rejected	230,475
Pounds of milk rejected/drugs	3,141,027
Producer Pounds of milk rejected/drugs	2,390,916
Total Pounds Rejected	3,371,502

GRADE A

Repeat Inspection Violation	641
Bacteria Violation	16
Somatic Cell Count Violation	23
Antibiotic Violation	57
Well Water Violation	28
Sweet Water Violation	27
Degrade for Repeat Inspection Violation	29
Degrade for Bacteria Violation	24

Degrade for Somatic Cell Count Violation	9

GRADE B

Bacteria Violation	7
Somatic Cell Count Violation	7
Antibiotic Violation	0
Farms Rated Probational due to score	6
Off Market for Bacteria Violation	3
Off Market for Somatic Cell Count Violation	6
Sediment Violation	4
Total Warnings Issued	887

STATE SAMPLING

Dairy Farm Water Supply	1,187
Dairy Plant Water Supply	97
Milk/Dairy Products	428
Antibiotic Testing	68
Monthly Product	194
Dairy Plant-Environmental	0
Total Samples Taken	1,974

LABORATORY TESTING (Environmental/Finished Product)

Standard Plate Count	935
Coliform	931
Phosphatase	636
Inhibitory Substances	1,112
DMSCC	120
Residual Coliform	120
Residual Bacteria	120
Number of certifications/Individuals	67
Total dairy lab testing	4,041

USDA STATE GRADING/SAMPLING

Egg	323,155 dz
Shell Egg Surveillance	159,233 dz
Retail Eggs	3,378 dz
Dairy NDM/Cheese/Poultry	1,410,000 lbs

CERTIFICATION OF DAIRY PRODUCTS FOR EXPORT	127,523,096 lbs
Certificates of Origin/Sanitation for Export	1,882

LICENSING/REGISTRATIONS

Bulk Milk Hauler	276
Cheese Factory	16
Cheese Re-Processing	2
Condensery	10
Creamery	1
Ice Cream	8
Mix Making Plant	4
Powdered Milk Plant	8
Cream Buying/Shipping	6
Egg Distributors	45
Egg Candlers	10
Total dairy industry licensing/registrations	386

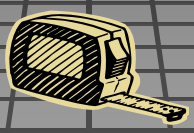
MORTALITY COMPOSTING

MORTALITY COMPOSTING

- Water quality protection:
- All composting areas must be adequately protected to prevent runoff, runon, and leaching to ground water. *(Mortality composting sites must be approved by ISDA prior to mortality composting).*

- Compacted soil berming around compost area. Berms consisting of compost or manure are not acceptable.
- Surface area of compost facility must be conducted on an all weather surface which allows access during inclement weather.
- Minimum of 15% compacted clay amended soils 2" above subsurface water, fractured rock, gravel, or sand.

- Minimum setback of:
  - 200 ft from domestic well
  - 1000 ft from public water system
  - 300 ft from property line
  - County ordinances may require additional setbacks from residences or property lines



Odor Control – composting procedures must be conducted in a manner to minimize odor generation – i.e. appropriate materials, amount of material under, around, and over carcasses, turning intervals, times, etc.

- Composting – mortality composting shall meet NRCS Animal Mortality Facility – Practice Standard #316.
  - If a dangerously infectious disease is discovered on any farm, the administrator of the division of animal industry will determine the allowable method of disposal
  - Large animals a minimum of 1 foot of base material under carcass
  - Minimum of 2 feet of sawdust, compost or other carbon source around the carcass
  - Composting material shall reach temperatures of 130º - 160º.

- Primary stage composted material shall be turned
- Secondary composting required. Compost must reach 122º for a minimum of 5 days.
- Complete record keeping required.

- Compost end use:
  - Land application rates and times in compliance with N.M.P.
  - Incorporation into soil to minimize potential runoff.
  - Large bones need to be buried, plowed under, or otherwise incorporated into the soil after application. Bones may be crushed or ground then land applied.
  - Proposals for utilization of mortality compost other than land treatment must be detailed in writing to the Administrator of the Division of Animal Industries.