



**COMPREHENSIVE LIVESTOCK AND ENVIRONMENTAL
ASSESSMENT AND NUTRIENT MANAGEMENT PLANS
WEST (CLEANmp)**

Manual of Operations

Prepared by:

SES, Inc.
6750 Antioch Road
Suite 305
Merriam, Kansas 66204





Table of Contents

1.0 Scope and Purpose..... 2

2.0 Definitions 2

3.0 CLEANmp Critical Participants 4

4.0 Request for CLEANmp Project Application 5

5.0 Application for CLEANmp Project..... 5

6.0 CLEANmp Project 7

7.0 Project Fees and Expenses..... 9

8.0 Data Handling and Records/Document Policy 9

9.0 Continuing Monitoring of Service Provider Performance 10

10.0 Service Provider Requirements 10

11.0 Public Notice and Information..... 12

12.0 Modification to CLEANmp Policies and Standard Operating Procedures..... 12

13.0 Confidentiality and Disclosure of Information..... 13

14.0 Conflict of Interest..... 13

1.0 Scope and Purpose

This Manual of Operations contains detailed procedures for administering an environmental assessment (EA) and nutrient management plan (NMP) project under the Comprehensive Livestock Environmental Assessment and Nutrient Management Plan West (CLEANmp) Program. The CLEANmp Program is run by the Environmental Resources Coalition (ERC), under a grant from the United States Environmental Protection Agency (EPA), and is administered and verified by SES, Inc. (SES). This manual sets forth the duties and obligations of the parties involved and the necessary training, inspection and monitoring procedures required to ensure the following: 1) accurate, representative and consistent implementation and interpretation of CLEANmp EAs; 2) accurate and representative development and review of CLEANmp NMP projects; and, 3) maintenance and uniform application of CLEANmp policy, and program quality assurance and quality control (QA/QC). The general outline and flow of this program is presented in Figure 1.

A CLEANmp project may consist of an EA, NMP development or review; or both, an EA and NMP development or review. A CLEANmp project will cover a single site. A single site is a poultry or livestock production operation consisting of a group of buildings or lots that are served by common utilities or a primary access road, and also managed by the same individual or team, using the same management practices. All buildings and applicable areas impacting a CLEANmp EA, at each site, will be entered and assessed.

2.0 Definitions

Assessor: An individual who has the qualifications to perform an EA of a livestock or poultry production operation and to produce an appropriate final report following the guidance of the CLEANmp program.

CLEANmp Service Provider: A professional that meets the approval criteria of the CLEANmp Program. These criteria are specified in the CLEANmp document *CLEANmp Program Service Provider Policy*.

CLEANmp Project: A CLEANmp project will be either an EA of a livestock or poultry operation, the development or review of a NMP for a poultry or livestock operation, or both an EA and NMP development or review. The requesting producer will decide the scope of the CLEANmp project in his or her *CLEANmp Application and Preliminary Information Survey*.

Equivalent Experience: On-the-job or work experience in the required field. One year of work experience is equivalent to one year of post-secondary education.

Nutrient Management Planner: An individual who has the CLEANmp qualifications to collect farm-specific information and develop an appropriate nutrient management plan for

the operation, using the tools mandated by the CLEANmp program. These qualifications are specified in the CLEANmp document *CLEANmp Program Service Provider Policy*.

Nutrient Management Tools: The primary nutrient management planning and development tool for the CLEANmp Program will be the Purdue University's Manure Management Planner (MMP). This software is the primary software tool CLEANmp Service Providers must use to develop NMPs. In those states not supported by MMP, other software tools, such as AFOPro™ and IdahoOnePlan, may be used with the prior approval of the CLEANmp project manager at SES. If no NMP software tools are available for a state, a CLEANmp nutrient management planner can use SES's in-house Microsoft Word templates, Excel spreadsheet tools, and GIS capabilities for the NMP development and review.

Potential CLEANmp Service Provider: An individual who meets the CLEANmp Program prerequisite qualifications and is in the process of completing the initial approval process.

Producer: The individual or organization requesting a CLEANmp project by submitting an *Application and Preliminary Information Survey*; also referred to as the "applicant."

Production Operation Sizes: The following list presents a general size classification scheme for the CLEANmp Program and does not reflect any federal or state size standards:

- a. Large egg production site (>800,000 birds)
- b. Medium egg production site (300,000 to 800,000 birds)
- c. Small egg production site (<300,000 birds)
- d. Large meat bird production site (>100,000 birds)
- e. Medium meat bird production site (50,000 to 100,000 birds)
- f. Small meat bird production site (<50,000 birds)
- g. Hog production site (multi-phase)
- h. Hog production site (single-phase)
- i. Large dairy (> 5,000 cows [dry and milking])
- j. Medium dairy (500 to 5,000 cows [dry and milking])
- k. Small dairy (< 5000 cows [dry and milking])
- l. Large feedlot (>15,000 animals)
- m. Medium feedlot (1,000 to 15,000 animals)
- n. Small feedlot (< 1,000 animals)

Service Provider: An individual who meets the CLEANmp Program prerequisite qualifications and has completed all aspects of the approval process.

3.0 CLEANmp Critical Participants

CLEANmp Program Administrator (SES, Inc.)

SES which is incorporated in the state of Kansas, is a private, for-profit organization. SES has developed protocols and guidance for the CLEANmp Program to address the impartiality, consistency and quality needs of ERC. SES maintains and revises the CLEANmp process as dictated by the CLEANmp operating procedures. In addition, SES develops and maintains program guidance and assessment tools. SES provides database management for the CLEANmp information, as well as program quality assurance and quality control (QA/QC), and service provider oversight/verification.

CLEANmp Program Manager

The program manager is a SES employee, who is responsible for overseeing all aspects of the CLEANmp and is the direct liaison with ERC. The program manager issues service provider approvals and denials.

CLEANmp Scheduling Director

The scheduling director is a SES employee and is responsible for communicating with producers and service providers relative to scheduling of projects. The scheduling director's responsibilities also include scheduling service provider oversights (see CLEANmp West Program SOP No. 001 *Service Provider and Program Implementation Verification*).

CLEANmp QA/QC Director

The QA/QC director is a SES employee, who is responsible for overseeing and maintaining the quality of the databases, and also service providers, both their implementation of the program and their project work (see CLEANmp West Program SOP No. 001 *Service Provider and Program Implementation Verification* and CLEANmp West SOP No. 002 *Evaluation and Entry of Data Collection Forms*).

CLEANmp Database Manager

The CLEANmp database manager maintains and updates all CLEANmp-related databases.

Approved Service Provider

This individual must meet and maintain his or her conformance to the requirements described in CLEANmp document *CLEANmp West Program Service Provider Policy*. An approved service provider implements CLEANmp projects according to the relevant program guidance and tools, and is responsible for protecting the confidentiality of project-related information.

Producer

Requests a CLEANmp project by completing and submitting a CLEANmp West *Application and Preliminary Information Survey*. In addition, a producer allows unfettered access to all production areas and data that are relevant to completion of the CLEANmp project.

4.0 Request for an Application for an CLEANmp Project

All project materials are posted at <http://www.erc-env.org>, and a CLEANmp West *Application and Preliminary Information Survey* can be filled out on the secure CLEANmp portion of this website. The non-Internet based process for applying for an CLEANmp project is as follows:

Upon receipt of a request for an CLEANmp project application, SES staff shall provide information relevant to the requirements for having an CLEANmp project and instructions for submitting an project application. Specifically, SES will provide:

- Identification of the EA standards and NMP tools that will be used; and,
- One copy of the CLEANmp West *Application and Preliminary Information Survey* Form, including the *Biosecurity Requirements* and *Use of Collected Information* forms.

5.0 Application for an CLEANmp Project

5.1 A producer, who is interested in requesting a CLEANmp EA, NMP or both, can apply for the project online at www.cleanmp-west.org or they can print an application from this website and submit it to the program administrator via mail. If the producer does not have Internet capabilities, he or she can request an application form from the project administrator and it will be mailed to them. The program administrator can be reached at (800-897-1163, ext. 27). The CLEANmp program administrator shall acknowledge receipt of an application within 14 days of receipt of the completed project application. A completed application includes all requested information, including producer confirmation that he or she understands and accepts the CLEANmp access requirements, data uses and the service provider quality control process (see Sections 9.0 and 10).

- 5.2** The CLEANmp program administrator will post descriptive information for the potential project on a secure website, only accessible to approved CLEANmp service providers and CLEANmp program administrator personnel. When this information is posted on the website, all approved service providers will be able to review the project application and submit a bid to conduct the project. This bid must not include costs for collecting manure or soil samples. These sampling activities are outside the scope of the CLEANmp program. To be eligible for a CLEANmp NMP a producer must have representative soils data not more than four years old and representative manure sample data not more than a year old. For seven days, the potential project will be considered “open” and potential service providers can bid on the cost of conducting the project. Only service providers that have current CLEANmp service provider approval will be allowed access to the project bidding portion of the website. Submittal of a bid will require a service provider to certify that they have no actual or potential conflict of interest with the producer and that they will schedule and conduct the field portion of an EA or NMP project within 30 days of being given a notice-to-proceed. Bid procedures can be found in the CLEANmp West Program document *Bidding Process – CLEANmp Program*.
- 5.3** After seven days, the project bidding will be “closed.” If a “closed” project has no bidders, the CLEANmp program administrator will solicit bids directly from the pool of approved service providers and re-open bidding for an additional seven days. If one or more bids have been received for a project, the CLEANmp program administrator will review the bids and award the project to the bidder who represents the greatest value for the program and the producer. To maintain quality, the CLEANmp program administrator reserves the right to reject an unrealistically low bid based on the CLEANmp program administrator’s understanding of the market. These procedures are detailed in CLEANmp West Standard Operating Procedure (SOP) No. 003: *Evaluation and Acceptance of Bids*.
- 5.4** When the winning bid is determined, the CLEANmp program administrator will notify the producer of the winning service provider’s name and contact information. The program administrator will also contact the selected service provider and notify him or her to proceed with the project. All projects must be scheduled within 30 days of notice-to-proceed. An EA project must be completed within 44 days of receiving the CLEANmp program administrator’s notice-to-proceed, and NMP projects must be completed within 75 days of receiving the program administrator’s notice-to-proceed, or within 45 days of completing the onsite visit portion of the project, whichever is less. The service provider must notify the CLEANmp program administrator of the site visit date and time at least 14 days prior to conducting the on-site portion of the project.

6.0 CLEANmp Project

- 6.1** A producer can provide the CLEANmp program administrator with objections to the selected service provider any time within 14 after they are notified of the selected service provider. Any objections must be submitted in writing and received by the program administrator within 14 days of when the producer was originally notified of the selection. The CLEANmp program administrator will review the objections and determine if there are sufficient grounds to reassign the project to a different service provider.

The service provider shall have no financial, ownership or other interest in the producer seeking the CLEANmp project that may influence the project or be considered a potential conflict-of-interest (see Section 14.0). Service providers are required to maintain the confidentiality of all information obtained about the producer and his or her operations.

- 6.2** After receiving the notice-to-proceed from the CLEANmp program administrator, the service provider will contact the facility to schedule the CLEANmp project. CLEANmp EA projects must be completed within 44 days of the time that the notice-to-proceed is given to the service provider; and NMP projects must be completed within 75 days of receiving the notice-to-proceed, or within 45 days of completing the onsite farm/operation visit, whichever is less. If there is a scheduling delay of the project beyond the 30 day target, the service provider must notify the CLEANmp program administrator and request an extension to the project window.

During the initial facility contact, a service provider must:

- a. Determine an acceptable time and date for the on-site portion of the project.
 - b. Request that personnel implementing and responsible for project-related issues at the operation be available during the on-site portion of the project.
 - c. Request that all applicable records, plans, permits or other documents pertaining to the project be gathered and made available for review during the on-site portion of the project.
 - d. Discuss and verify biosecurity requirements for the facility, based on the producer's application. At a minimum, discuss the number of animal-free days required and acceptable clothing.
- 6.3** The CLEANmp EA is based on the Good Environmental Livestock Production Practices (GELPP). The GELPPs have been approved by the American National Standards Institute (ANSI). A CLEANmp assessment is guided by the *CLEANmp West Assessment Form* and interpretive guidance is provided by the *CLEANmp West General Interpretive Guide*. Both documents are posted on the secure CLEANmp website.

The CLEANmp NMP program is guided by existing software packages. The primary nutrient management planning and development tool for the CLEANmp program is Purdue University's MMP. In those states not supported by MMP, other software tools, such as AFOPro™ and IdahoOnePlan, may be used with the prior approval of the CLEANmp Project Manager. If no NMP software tools are available for a state, a CLEANmp nutrient management planner can use SES's in-house Microsoft Word templates, Excel spreadsheet tools, and GIS capabilities for the NMP development and review.

A service provider will completely fill out the applicable CLEANmp EA or NMP data collection forms during the conduct of the project. When the project is complete, the service provider will send the original project form and/or the electronic NMP files and the associated written reports to the CLEANmp program administrator, and will keep a copy of all documents and electronic files for him or herself. The service provider will maintain these copies for 60 days. No more than 60 days after the project, the service provider will destroy these files and documents, unless notified, by the program administrator.

Once the CLEANmp program administrator receives the project files and documents, they will be reviewed for accuracy and completeness. If any information is incomplete, the CLEANmp program administrator will conduct a phone interview with the applicable service provider in an attempt to achieve 100 percent completeness. The CLEANmp program administrator reserves the right to send a service provider back to the site if acceptable (based on the program administrator's determination) completeness and accuracy cannot be achieved over the phone, at no additional pay to the service provider. Once the CLEANmp program administrator deems the project files and documents complete and acceptable, the service provider will be paid by ERC.

- 6.4** Information that is not producer-specific will be entered into the appropriate database. This will be used to generate aggregate project results, not producer-specific information. The producer will then be sent copies of the associated plans or reports from the completed project. In addition, the producer will be sent a service provider evaluation form and a stamped and addressed return envelope. The producer will be asked to complete this evaluation to provide additional quality control and quality assurance information on the service provider and the program as a whole.
- 6.5** All producers participating in the CLEANmp Program, by submitting a project application, accept and agree to abide by and cooperate with the CLEANmp service provider and project system quality control procedures. These quality control procedures provide for a possibility that the Scheduling Director will randomly select a producer's project for oversight/verification and review of the service provider conducting the project (see CLEANmp West Program SOP No. 001 *Service*

Provider and Program Implementation Verification). A producer, but not the associated service provider, will be notified that their operation will be involved in a quality control oversight prior to the on farm data collection visit. This notification will occur no later than one week prior to the on farm visit.

7.0 Project Fees and Expenses

All applicable fees and bidding processes directly related to a CLEANmp project are described in detail in the *CLEANmp West Bidding Process* document. The costs associated with a CLEANmp project are administered by ERC, through a grant provided by EPA.

8.0 Data Handling and Records/Document Policy

Data Handling

- 8.1 Production type-specific data, **NOT** producer-specific data, from the actual project files and documents will be entered into the appropriate CLEANmp database (one for EAs and one for NMPs). The CLEANmp West SOP No. 002: *Evaluation and Entry of Data Collection Forms* governs this process.
- 8.2 Only the program administrator will have direct data entry and data output access to the CLEANmp databases. This database will not be maintained online and will not be accessible through the Internet.
- 8.3 Database and website maintenance will be performed, as needed, in order to generate specific queries of data. Issues relative to database and website security will be addressed within 24 hours of receiving or discovering security problems. In most cases, a website security problem will result in temporary website shutdown as soon as the problem is verified. The CLEANmp QA/QC Director will verify the validity of database security problems. If the website is shutdown for security issues, it will not be re-opened until the security issues/problems have been successfully resolved.
- 8.4 QA/QC will be performed on 100 percent of the project data prior to being entered into the database. The data will then be entered to the appropriate secure database. CLEANmp West SOP No. 002: *Evaluation and Entry of Data Collection Forms* will govern this process.

Records and Document Policy

- 8.5 All project-related documents submitted by service providers are business confidential. They will be stored in a secure location by the program administrator for no more than three years after the CLENmp-West program stops functioning.

- 8.6** Only the producer or the program administrator can authorize the reproduction of any project documents related to a specific project. Generally, documents related to a specific project will only be reproduced in the event a producer misplaces a report and requests a new copy, within the 30-day window described above. Only the producer can authorize the release of project information, outside the CLEANmp Program.
- 8.7** Electronic copies of databases will be maintained by the program administrator for the duration of the program. These databases will be maintained on a system not accessible via the Internet and, at least twice a week, security backup copies of the database will be made to preserve the electronic records. One copy will be stored off-site in a fireproof safe for additional data security.
- 8.8** Records, including service provider-specific information, completed oversight/verification forms, correspondence and any electronic files related to service provider approval and maintenance will be maintained in paper and electronic format, as applicable, for the duration of the CLEANmp program. Access to these records will be controlled by the CLEANmp program administrator. These records will only be accessed in the event of a quality control issue or security issues relative to a given service provider. These records are business confidential.

9.0 Continuing Monitoring of Service Provider Performance

Active approved CLEANmp service providers will have approximately a 10 percent chance of being observed for QA/QC purposes by program administrator personnel during a project. The program administrator will attempt to have active service providers overseen at least once per year. This oversight is used to maintain a QA/QC check on program implementation, evaluate service provider effectiveness and to identify future training topics and program areas that need revision. This oversight is governed by CLEANmp West SOP No. 001: *Service Provider and Program Implementation Verification*.

10.0 Service Provider Requirements

A service provider must meet the requirements of CLEANmp-SERV. PROVIDER-01: *CLEANmp West Service Provider Policy*. Included in this policy are experience, educational and training requirements.

- 10.1** In order to be approved as a CLEANmp service provider, an individual must have the following prerequisite qualifications:
- a. An individual must be a registered Technical Service Provider (TSP) listed on the Natural Resources Conservation Service's TechReg website (<http://techreg.nrcs.gov>). The individual must be a TSP registered for either CNMP Plan Development in at least one of the following categories: Land

Treatment, Manure and Wastewater Handling and Storage, Nutrient Management, Total Plan; or Land Treatment; or Nutrient Management - Organic and Inorganic; or Manure and Wastewater Handling and Storage. In order to qualify to develop a NMP for an applicant (producer) that has an Environmental Quality Incentives Program (EQIP), a CLEANmp service provider must have TSP registration under the following category: CNMP Plan Development-*Total Plan*.

- b. The individual must be physically capable of walking continuously for several hours and maneuvering in small/tight places (i.e., alleyways in production buildings), under typical weather conditions.
- c. The individual must have at least daily access to the Internet, e-mail, and a printer.

10.2 If an individual meets the prerequisite qualifications, they may start the process of becoming an approved CLEANmp service provider. The requirements are the same regardless if an individual is pursuing approval as an assessor, planner or both. This individual will need to complete the following steps:

- a. The potential service provider must complete a CLEANmp Information Form and upload a current resume on the CLEANmp website.
- b. The potential service provider must sign a CLEANmp service provider Performance Agreement.
- c. The potential service provider must sign a CLEANmp service provider Confidentiality Agreement.
- d. The potential service provider must agree to abide by and follow the CLEANmp Code of Ethics. The CLEANmp Code of Ethics is presented in Section 12 of the CLEANmp Program Document *CLEANmp West Program Service Provider Policy*.
- e. The potential service provider must provide SES a copy of a valid government-issued form of picture identification.

10.3 The program administrator reserves the right to deny CLEANmp approval to an individual who: 1) exhibits behaviors that do not reflect what is expected of a service provider under the CLEANmp Code of Conduct, or 2) does not have the technical capability commensurate with their TSP registration. These criteria apply in any venue where a service provider (approved or in process) is representing him or herself as a CLEANmp service provider or can otherwise be connected with the CLEANmp Program.

11.0 Public Notice and Information

All applicable CLEANmp Program documents and announcements will be maintained on the CLEANmp Program website (www.cleanmp-west.org). These documents are posted in PDF format and they should reflect the most current versions of the documents.

12.0 Modification to CLEANmp Policies and Standard Operating Procedures

12.1 The ERC or the program administrator can periodically recommend modifications to the policies and SOPs for the CLEANmp Program. Unless deemed “program critical,” these recommendations will only be acted upon once per year (see Section 12.3). The one-year period will be based on a starting point defined by the first application for a CLEANmp project received by the program administrator.

Only ERC can authorize modifications to the CLEANmp Program. When a decision has been made to modify program criteria, tools or procedures, the program administrator shall be notified of the changes and rationale for the changes. ERC will consider all comments by the CLEANmp program administrator prior to finalizing any changes to the program. ERC shall decide on the effective date for the modifications.

12.2 Producers, service providers, livestock groups, trade associations, or other groups that are stakeholders in the CLEANmp Program can suggest or request changes to the program procedures, standards and guidance. If the revised procedures, standards or guidance are accepted by ERC, the CLEANmp program administrator will revise the project tools, guidance or procedures as appropriate, under the direction of ERC. The revised project tools, standards or guidance will be forwarded to ERC for final approval. As soon as this approval is received, the new project materials will be distributed and used for future CLEANmp projects.

12.3 ERC and the program administrator will annually review CLEANmp policies and SOPs and modify them if appropriate. The one year period will be based on a starting point defined by the first application for a CLEANmp project received by the program administrator. If through service provider oversight, facility input, program administrator input, ERC input, or any other means, a program-critical issue is discovered, ERC has the authority to address and correct the problem through program or policy changes at the time the critical issue is identified. A program critical issue is one that threatens the credibility of the program, confidentiality of data, or the thoroughness of the CLEANmp Program.

12.4 All approved service providers will be informed of any modifications to CLEANmp policies, project tools and SOPs through e-mails and postings on the secure CLEANmp website. Periodic e-mail newsletters may be sent to all approved service

providers that will describe any modifications, as well as suggestions and helpful hints for service providers to use to better their CLEANmp-related skills.

13.0 Confidentiality and Disclosure of Information

- 13.1** All information acquired during CLEANmp activities is to be treated as confidential business information by all program participants, including all service providers, pending, approved and whose approval has expired or been revoked. Liability for the unauthorized release of confidential information is borne solely by the individual, group or organization that releases the information.
- 13.2** Access to CLEANmp data will be controlled by the program administrator. The producer has the right to release information from his or her report and/or plan to whomever they decide needs to be able to view their data.
- 13.3** All paper documents relative to a given CLEANmp project, in the possession of the program administrator or a service provider, will be destroyed 30 days after the project is completed.
- 13.4** All program administrator personnel and approved service providers must sign a CLEANmp Confidentiality Agreement, which protects program and project information from release.

14.0 Conflict of Interest

No approved service provider will bid on or conduct a CLEANmp project where they have an actual or potential conflict of interest. A conflict of interest is defined as a direct or indirect personal, business or financial connection or interest with the producer. Examples of a conflict of interest relative to a service provider would include, but are not limited to, having worked for the producer (i.e., provided consulting services for the producer within two years of the submittal of an CLEANmp bid relative to the same producer), have a social or familial relationship with the producer or an employee of the producer, or have a known financial interest in the producer or facility. A service provider that is unsure if they have a conflict of interest should contact the program administrator prior to bidding on a project.

FIGURE 1

