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## RISK BASED COMPLIANCE PROGRAM FOLLOW-UP

Operational Policy 2018-3

Agricultural Operation Practices Act  
May 3, 2018

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## 1. Background

The Natural Resources Conservation Board (NRCB) introduced the risk based compliance (RBC) program in 2009 as part of its updated Compliance and Enforcement Policy.

The intent of the program was to proactively identify any risks to groundwater quality at confined feeding operations (CFOs) listed in the NRCB's CFO database. While the main focus of the program was groundwater, any risks to surface water were also documented and the operator was required to address the risks.

CFOs had to meet all of the following criteria in order to be considered for the RBC program:

- the CFO was using an earthen manure storage (EMS) for storing liquid manure,
- the EMS was constructed prior to 2002, and
- the CFO was located in a region identified on groundwater vulnerability maps as being high or very high risk for groundwater.

CFOs that had an AOPA permit issued after 2002 or that were inspected under the NRCB's leak detection program were excluded from the RBC program because groundwater conditions had already been assessed at these operations.

The RBC program identified 172 operations in the CFO database with facilities that met the three criteria identified above. (When the CFOs were inspected by NRCB staff, the facilities at some of the operations were found to be abandoned or not constructed. These operations were not assessed.)

Operations that still qualified for the RBC program were assessed using information collected during inspections, information from environmental maps (e.g., groundwater, soil, geology) and other sources (e.g., the Alberta Environment and Parks water well database). Information from the inspections and desktop reviews was uploaded into the NRCB's environmental risk screening tool (ERST). The tool classified the risk to groundwater as either potentially low, moderate, or high risk. (The ERST was developed in 2007-08 and successfully implemented in 2008-09 for the NRCB's leak detection program.)

NRCB staff also encountered some CFOs that met the above three criteria, but that were not listed in the NRCB's CFO database (i.e., they were previously unknown to the NRCB). In these cases, basic information about the operations (e.g., land owner, land location, species type) was collected and entered into the CFO database. These operations were not assessed under this program.

The RBC program was completed in 2017. Eighty eight operations from the original 2009 list of 172 operations did not meet the three RBC criteria factors (listed above) and therefore were not assessed. Two hundred and thirteen facilities at 84 operations were assessed for risk to groundwater. Some CFOs had multiple facilities, and in some cases the different facilities at a CFO had different risk ratings. Of the 213 facilities assessed:

- 176 facilities were classified as potentially low risk,
- 29 were classified as potentially moderate risk, and
- 8 were classified as potentially high risk to groundwater.

Any risks to the environment identified by NRCB staff were addressed by the operators to the satisfaction of the NRCB.

## 2. Required risk-based program follow-up

NRCB inspectors will conduct follow-up inspections for RBC scored operations according to the following schedule:

- **High risk sites** – inspectors will review all of their high risk sites each year.
- **Moderate risk sites** – inspectors will review two of their moderate risk sites each year.
- **Low risk sites** – inspectors will review each of their low risk sites once every four years.

The follow up inspections will be used to ensure that:

- 1) changes have not been made to the operations that would increase the risk level
- 2) required monitoring and maintenance is being conducted (this could include completing the well water or leak detection checklist)

If an operation assessed under the RBC program submits a permit application and is issued the permit, the inspector will remove the operation from the RBC follow-up inspection list. (Risks will be addressed before the permit is issued.)

**It is the responsibility of the inspector to track the required annual follow up for each CFO assigned to the inspector, as identified in the CFO database, and document the follow up in the CFO Database. Follow-up inspections will also be tracked as part of the NRCB's exception report process.**

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Copies of the *Agricultural Operation Practices Act* can be obtained from the Queen's Printer at [www.qp.gov.ab.ca](http://www.qp.gov.ab.ca) or through the NRCB website.

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