Animal BMP Excess

8/8/2025

Tom Butler, EPA

A timeline

May 2025

 Initial review request for processing of several animal BMPs

July 2025

(outside of original meeting)

- Animal Waste Management Systems
- Mortality Disposal









June 2025

 Continued discussion and fleshing out of request

August 2025

- Riparian fencing
- Next steps

Initial investigation

Discussing submissions with jurisdictions

Do BMPs with the same Lat Long and Date mean the same system duplicated?

Conversion factors:

- BMP submitted as systems gets converted to animal counts
- From phase 6
- Same for waste management and mortality disposal

Systems capacity

• CAFO permit is NOT the same as NASS population

Exclusion fencing default

All States EXCEPT VA report fencing only and use a default value for AUs

- VA reports AU excluded along with length and width
- 1000ft of fencing = 17.6 Animal Units
- Do we need to revisit the default?

You can report fencing as feet or acres

- When acres are reported and no length is supplied, length is calculated.
 - Assume a 10-foot width for narrow buffers and 35 for full buffers
 - IF buffers are wider this will overestimate the length fenced.
- Should default widths be wider?

Follow up questions:

Do we need to update the conversion factor for P7?

Does mortality disposal need a conversion factor that differs from AWMS?

Are animal submissions based on max capacity?

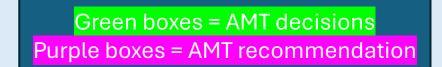
• If not, what is the prevalence of reaching max capacity?

Exclusion fencing:

- Do we need to revisit the default conversion?
 - Wider? Narrower?

AnimalName	Source	AverageAnimalCountPerSystem	MortalityFraction
pullets	Sales	9,734	0.08
turkeys	Production	3,744	0.15
hogs and pigs for breeding	Inventory	428	0.08
beef	Inventory	22	0.09
broilers	Production	198,096	0.05
dairy	Inventory	84	0.1
hogs for slaughter	Sales	74	0.05
horses	Inventory	7	0.01
layers	Inventory	1,720	0.08
other cattle	Inventory	43	0.03
sheep and lambs	Inventory	33	0.03
goats	Inventory	13	0.03

Questions?



Next steps: Compile feedback

Question	Change required?	Suggested change
Do we need to update the AWMS conversion factor for P7?		
Do we need a unique conversion factor for MD that differs from AWMS?		
Are animal submissions based on max capacity?		
Do we need to revisit the default exclusion fencing conversion? (1000ft of fencing = 17.6 Animal Units)		
Should the default be wider? (10- foot width for narrow buffers and 35 for full buffers)		

Preliminary Feedback

Preliminary Feedback

Green boxes = AMT decisions

Purple boxes = AMT recommendation

Question	Change required?	Suggested change
Do we need to update the AWMS conversion factor for P7?	Maybe	There is a potential mismatch in reporting AU types against model numbers that are out of date. E.g. poultry excess could be true given industry fluctuations, informed by industry sources and the census.
Do we need a unique conversion factor for Mortality Disposal that differs from AWMS?	Unsure	
Are animal submissions based on max capacity?	Not everywhere	Potentially use plan records for numbers
Do we need to revisit the default exclusion fencing conversion? (1000ft of fencing = 17.6 Animal Units)	Maybe	That default AU conversion was based on a Virginia pasture study. Perhaps other data exists.
Should the default be wider? (10-foot width for narrow buffers and 35 for full buffers)	Likely, yes	Don't only see much wider buffers (wider than 35'), but sometimes see practices stacked beyond that buffer.