Animal BMP Excess

9/4/2025

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
hade and nide for			
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
			0.08
layers	Inventory	1,720	
other cattle	Inventory	43	0.03
sheep and lambs	Inventory	33	0.03
goats	Inventory	13	0.03

Follow up questions:

tactor for P/?

factor that differs from AWMS?

Are animal submissions based on max capacity:

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
1	layers	Inventory	1,720	0.08
	other cattle	Inventory	43	0.03
	sheep and lambs	Inventory	33	0.03
	goats	Inventory	13	0.03

Next steps:

Question	Change required?	Suggested change
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. We are looking at the ratio of AU to acres for each state/county to see if this ratio is consistent across the watershed
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. Data call is out asking states to provide buffer widths.

Questions?