Meeting Minutes

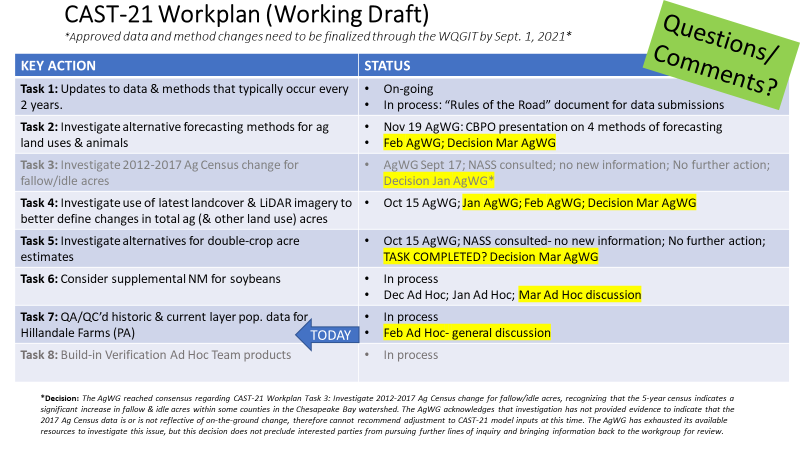
Feb 11, 2021

12:00 PM-12:55 PM

Ad Hoc Group- CAST CONCERNS

**Action:** Further clarification on the decisional process will be discussed when more progress has been made on Workplan Task 7: Hillandale data.

**CAST-21 Workplan Progress Updates**

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**Task 7: QA/QC’d historic & current layer pop. data for Hillandale Farms (PA)**

Mark Dubin (UMD), Jeff Sweeney (EPA-CBPO), and Vanessa Van Note (EPA-CBPO) discussed the current challenge related to Task 7, how it is being addressed, and the possible consequences to resolving it. This task is in-progress and will be discussed later in the AgWG. It is important that the states signatory reps have a sound understanding before that occurs.

*Discussion:*

**Jeff Sweeney:** Change where layer populations are in PA will affect all states. There is a connection between manure and fertilizer. For manure it is based on the county scale and rooted in the needs of the crops. We get the acres and types mostly from the census. Fertilizer is different. The approved method is to take all the county level data that we have for use and sales and put is all in one bucket and redistribute it across the entire watershed. Fertilizer is going to change somewhat because it is distributed after manure. I don’t think it will have a huge impact [across the watershed], but certainly will have a [significant] change in Adams and York. Compared to other changes [in CAST-21], like the landcover, it is not that impactful.

**Loretta Collins:** I need more clarification on the decision points. Is there a decision to be made here?

**Jeff S:** We may need a decision. We will make some decisions on our own in among the CBPO staff, but we will need to explain the methods. If there is a big disparity, that needs to be explained to the group. We want to be transparent and be sure the partnership is comfortable with the change.

**Loretta C:** So the decision is not, ‘SHOULD WE accommodate the 5 million layers in the correct location?’- it is, ‘HOW to do it?’

**Ted Tesler:** Some background- Pat Thompson with EnergyWorks, a manure treatment technology facility adjacent to the Hillandale layer facility is interested in pursuing nutrient trading and is looking for some justification of their nutrient pound reduction which at this point in not acknowledged in the model because the model does not know that the birds are there. The process would be to true up the “D” value from the Ag Census with better local information. And how can we do that in a way that is uniform? I imagine other states have similar situations with large facilities. This will up-end Adams county as far as their loads. The idea is to have the manure funneling into the facility where it is treated. Having a bunch of new load assumptions may make it worse if we are not showing that the manure is being treated by the facility. It does bring up the issue of “D” value facilities.

**Loretta C:** My understanding is that Adams is not “D” county. This is a massive layer operation that should be reporting, thus resulting in a D county, but my understanding right now is that it is not, but I am not sure.

**Ted T:** There is a systematic issue with date capture we should address.

**Loretta C:** Are we adding 5 million layers or redistributing what we have for the CBW?

**Jeff S:** We do have confidence that the layer operation was reported to the Ag Census, but NASS will not tell us for sure. So we will just take the 5 million from the CBW and be redistributing it.

**Bill Angstadt:** NASS has allocated to the counties manure excreted and now you want to refine that with another set of date to reallocate across the counties?

**Jeff S:** The state-wide total is Ag Census data. We redistribute to the “D” counties, because the assumption is that those counties have a population there and it may be somewhat large. The partnership came up with a way to do that distribution. We are still using Ag Census totals. We are not changing what the Ag Census says at the state level. We are just going to distribute differently knowing that there are 5 million birds in that county.

**Bill A:** Is EnergyWorks currently operating?

**Ted T:** Sporadically is my understanding.

**Bill A:** So they have a DEP air permit to operate?

**Ted T:** I would need to check. I don’t know for sure.

**Bill A:** The next step after allocating more accurately is to look at the manure that is generated, where does it go? For many years Hillandale has had a compliance through CAFO permitting doing annual reports so the manure had been land applied probably, so should be contributing minimal edge-of-field loss. So if we are going to project that this manure will no longer be land applied, then where was it land applied? Mark said was going into MD and other counties and the PA SCC would have all that data. Mark- when we were with the CBC a decade ago when they first started with Marel [King], most of their land application was on their [Hillandale’s] land or adjacent farms and very dominantly in Adams County. This was a problem since the manure was not leaving Adams county and in county could not be counted as manure transport. So you have that issue on top of this before you can start talking about change in edge-of-field load in Adams county. This is very complicated… Is this the best use of our limited resources just to find out how much litter is being generated in Adams county?

**Jeff S:** It is not as complicated as you think. The rules have been established so all of the sudden we will have a lot more manure nutrient in Adams county, dramatically reducing the amount of fertilizer nutrient that goes on because the manure is already there to meet the crop need.

**Bill A:** That is not correct. The fertilizer tonnage is allocated by county based on what crops are grown- not by manure being generated.

**Jeff S:** No, it accounts for the manure. It is not a separate operation. You account for what the needs are and you know what is available from both fertilizer and manure.

**Bill A:** Well you are talking about application slopes, but fertilizer is not going to change for Adams County.

**Jeff S:** Yes, it will.

**Bill A:** How? Not if the crops don’t change. It is an assignment of tonnage based on the smoothing of crop acres.

**Jeff S:** Now you have a lot more manure nutrients available to meet that need in that county so you would have less fertilizer going on to meet that need because it sees that manure is meeting a significant amount of that need.

**Bill A:** I will take a look at the documentation.

**Jeff S:** We only move the manure nutrients if it is reported as being transported. But whatever manure is there will go down that then be supplemented by fertilizer. The amount sof fertilizer going down will change with increases in manure.

**Loretta C:** [addressing earlier comment] The Hillandale issue is in the CAST-21 Workplan, therefore it is a Management Board ask.

**Jason Keppler:** So manure is applied first and then the fertilizer goes on top of that. Is there a limit to the amount of fertilizer that goes into Adams County? Does that than push the remaining fertilizer into adjacent counties or other parts of PA, increasing their load as a result?

**Jeff S:** It is pushing it everywhere. It affects all CBW counties. A tiny little bit, because it is distribute d across the watershed.

**Jason K:** I understand the process and where folks are coming from. My only concern is that we are setting a precedent to allow states to make modifications to input decks. This could open us up to other jurisdictions making similar requests with different sets of data.

**Ted T:** I would counter that we perhaps adopt a better process to inform the inputs potentially by using CAFO data instead of NASS or other Ag Census info where we are having to make some assumptions in relation to state-wide numbers and in this way the CAFO info could be better represented. Just as an option…

**Loretta C:** My understanding is that the Ag Census does not differentiate between permitted and non-permitted, so it is tough for the modelers.

**Jason K:** Jurisdictions have the ability to differentiate the split between permitted and non-permitted operations.

**Jeff S:** Yes, that’s right. We do have that in there.

**Ted T:** The split isn’t the population. That’s just a percentage break of an existing number. We are looking for the actual numbers of animals. The split is just the split. It doesn’t change the populations.

**Cassie Davis:** The split doesn’t change any loading either, is just an extra attribute, whether is it CAFO or non-CAFO.

**Jeff S:** Right. The total population does not change- just the division between the two. But it is important because when you are tracking BMPs, it is more likely that you will have better information on the CAFOs. Is does go back to the TMDL where we have these divisions between regulated and non-regulated. Which is why we made that split…

**Loretta C:** What is the next step? Do we need to talk about this more in this group? I know there is still more work for Mark, Vanessa, and Jeff to do. Do we need more clarity at this level?

**Mark Dubin:** We are happy to answer any additional question if folks reach out.

**Loretta C:** Still unclear if there is a decision to make and what that decision would be so we may have to revisit the procedural part of this to make sure everyone is on the same page. We will table this until there is more info on what this would look like.

**Jeff S:** Do we come back to this group or the AgWG?

**Loretta C:** I think maybe the next step is the AgWG, but I thought it was important that the folks in this group have some awareness of the issue first.

**Fertilizer Data Clarification**

Loretta clarified that the current process with fertilizer data inputs is that the state chemists send their data to AAPFCO. The CBPO periodically purchases data from AAPFCO and it is applied into the model according to agreed-upon methods. If we were to account of fertilizer in a different way, the partnership would have to agree to the source and the methodology.

**Summary of Actions**

**Action:** Further clarification on the decisional process will be discussed when more progress has been made on Workplan Task 7: Hillandale data.

12:57 **Adjourn**

**Participants**

Loretta Collins, UMD

Clint Gill, DE

Jason Keppler, MDA

Cassandra Davis, NYSDEC

Emily Dekar, USC

Ted Tessler, PA DEP

Bill Angstadt, Angstadt Consulting

Brady Seeley, SCC

Kate Bresaw, PA DEP

Matt Monroe, WV

Jeremy Hanson, VT

Mark Dubin, UMD

Vanessa Van Note, EPA-CBPO

Jeff Sweeney, EPA-CBPO

Ruth Cassilly, UMD