

Broiler Mortality Freezers Interim BMP

Questions from the Watershed Technical Workgroup

October 18, 2018

What is an interim BMP?

Requested by the states/partners for planning purposes

- Can be used in planning scenarios only (milestones and WIPs)
- Cannot be submitted for annual progress in order to judge if states fulfilled milestone and WIP commitments
- Should have scientific justification

Comparability to future approved BMP is important

- EPA and states should have reasonable assurance that the mechanics (model representation, reporting units, load source, etc.) of the interim BMP will be similar/identical to the future approved BMP
- Load reductions and/or efficiency values associated with interim BMPs must lean conservative
 - Because values and assumptions have not been reviewed by an Expert Panel

Often referred to as a “placeholder” BMP

- Creates expectation that there will be a partnership-approved BMP in the future

Partnership-approved BMPs must go through an Expert Panel

- Interim BMPs have not gone through an Expert Panel
- Interim BMP status does not guarantee future approval of the BMP for crediting towards load reductions

Interim BMP Approval Process



WTWG Concerns and Response

Does load source (dead bird nutrients) exist in the model?

- We don't know.
- The AMS and Ag Workgroup previously attempted to assess mortality nutrients, but were unable to for the Phase 6 Model.
- It is unknown whether the manure generation and/or nutrient concentrations used in the Phase 6 Model include dead birds or not. AMS and Ag Workgroup were unable to answer this previously.

Without a known load source, what is the “baseline” condition from which to take a nutrient reduction?

- We don't know.
- Typically an expert panel would define this.

WTWG Concerns and Response cont'd

How much of the rendered animal is discharged through a permit as direct load? Is this captured in the model?

- Any industrial point sources that report discharges are included as a direct load in the model.

Is double-counting an issue related to the animal waste storage BMP?

- We don't know.
- Because we do not know if dead bird nutrients are included in the manure generation and/or nutrient concentrations used in the Phase 6 Model, we cannot know if proper storage of the waste is already accounting for dead birds.

WTWG Concerns and Response cont'd

How would carcass nutrients be replaced in the model if interim BMP is approved?

- Fertilizer N would be brought in to replace lost nutrients, and fertilizer N increases can increase pollution rather than decrease. No fertilizer P would be brought in to replace lost nutrients.

Is there a water quality benefit from this BMP?

- We don't know.
- That would depend upon how carcasses were treated in the past versus how they are treated now. Typically an expert panel would help answer this question.

Additional WTWG Concerns

Without a known baseline...

- Cannot determine if N and P load reductions are appropriate

Tracking and Reporting

- Clarification needed on how the BMP works in CAST and NEIEN