

# United Egg Producers XL Project

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# Clean Water Regs are Changing

- Proposed CAFO rules will require states to issue NPDES permits for poultry & egg production (as well as dairy, beef, hogs)
- States will issue individual permits to “exceptionally large” egg producers
- Smaller CAFOs will be issued general permits

# XL is a Progressive Option

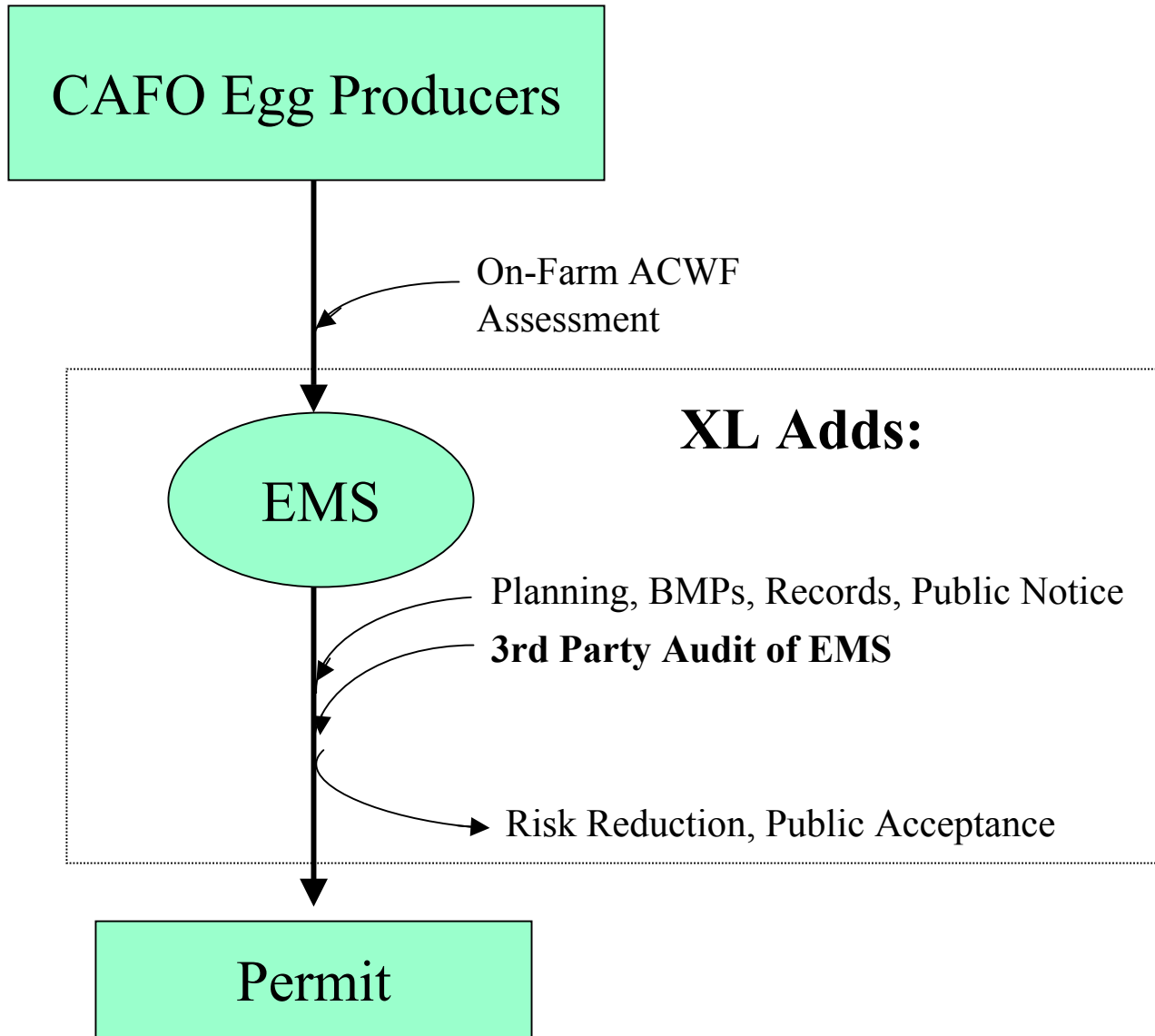
Participating egg producers  
implement EMS using UEP guides

3rd-party audit

Participating states issue  
general NPDES permits to large  
egg producers in XL program

# What the XL is All About

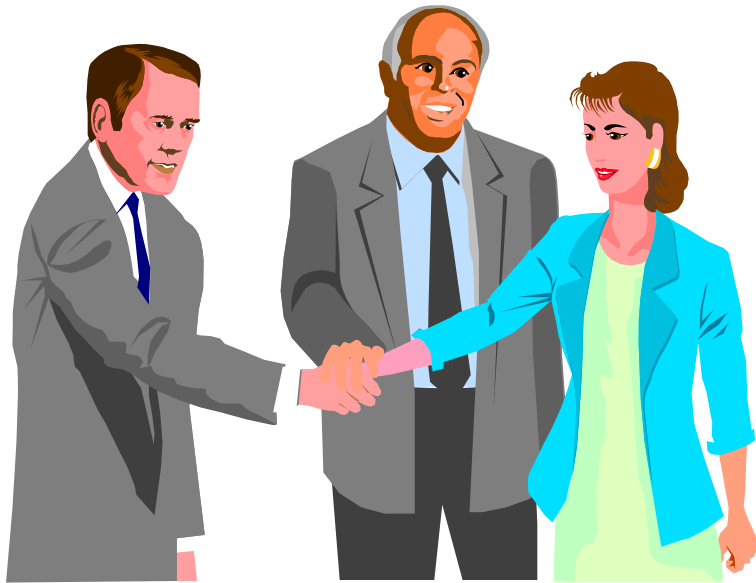
- States have a choice whether to participate
- Egg producers must implement an EMS and then pass 3rd- party audit to participate
- Egg producers save time & money with general instead of individual CAFO permits
- Annual audits verify EMS is still followed
- XL project is compatible with new CAFO regs



# Egg Producers' EMS

- Pledge to follow a code of good practices
- Develop environmental objectives and plans
- Establish management systems for anticipating problems & avoiding mistakes
- Delegate authority but retain responsibility
- Implement the BMPs of the EMS
- Maintain a public communication effort
- Review progress regularly & adjust as needed
- Keep proper records and document efforts

# Benefits of an EMS

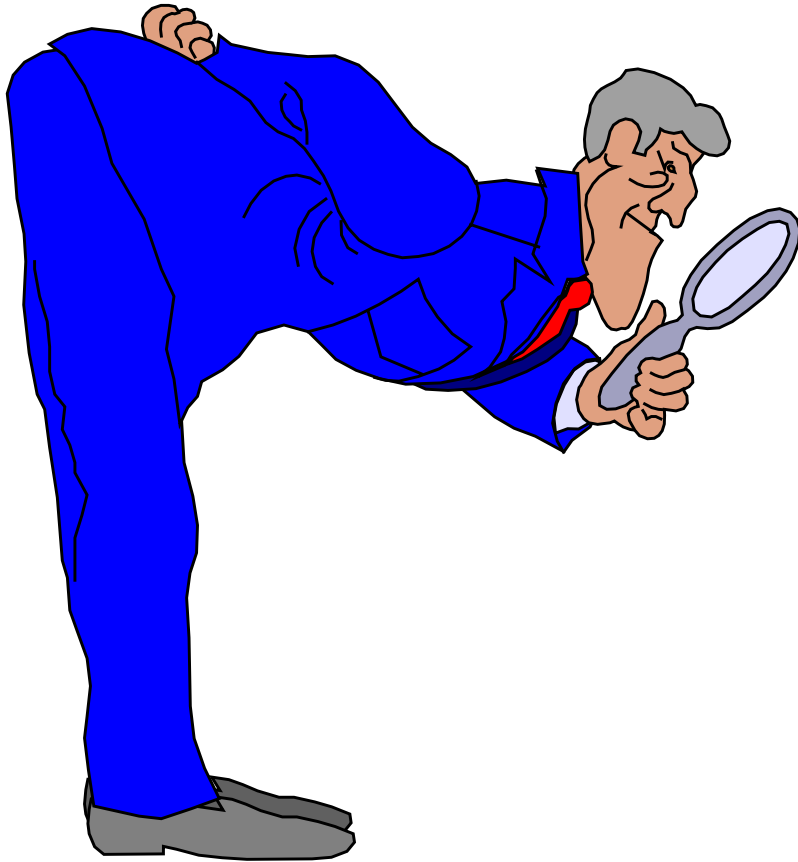


- Reduce accidents
- Improve cost control
- Reduce possible liability
- Lower insurance rates
- Satisfy lenders/investors
- Improve public relations
- Improve regulatory status
- Qualify for general permit

# Critical Management Programs

- All animal water must be in closed systems
- Maintain fly, rodent control programs
- Maintain dead bird disposal program
- Maintain odor management program
- Maintain preventative maintenance program
- Maintain emergency response program
- Use CNMP to land apply manure/compost
- Maintain communications with public

# Third-Party Audits



- Necessary to qualify
- Annual thereafter
- Comprehensive
- Becomes public when audit is successful
- Failed audits remain confidential
- America's Clean Water Foundation

# Linking the EMS & Permit

- Producers interact with the public for EMS
- Once 3rd-party audit is done, producers will publish notice in local newspaper and give notice to key local stakeholders
- Information on audit results is then sent to state and posted on website along with NOI
- Information about the EMS, audit and general permit are public documents

# What's in the General Permit??

- Written by EPA Office of Water
- Compatible with proposed CAFO regulations
- Requires continual implementation of EMS
- Requires CNMPs for all land application
- Requires recordkeeping, manure testing
- Requires reporting of spills, discharges
- Includes statutory enforcement authorities

# We're Underway!!



XL Program

- EMS & general permit guidance published
- Audit program designed
- “How to” manuals drafted
- EMS workshops planned
- UEP meetings with States underway
- On-farm assessments by ACWF helping to ‘prep’ producers for EMS work