



Quality Watch

By Gary Trimmer

Director of Member Services/Quality Control

Michigan Regulations Mean All Large CAFOs Must Obtain Permits

Michigan regulations put into place in 2005 directs all large Concentrated Animal Feeding Operations (CAFOs) – those with 700 mature cows or more to apply for coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit or obtain an individual NPDES permit. This regulation was developed with consideration for Michigan's unique ECOS agreement, which expires at the end of this year. All large existing CAFOs must apply before July 1, 2007.

The ECOS agreement was the product of a January 2002 agreement between the Michigan Department of Environmental Quality (MDEQ) and the United States Environmental Protection Agency (USEPA) that allowed Michigan livestock farms that fell into the large CAFO category and had not had a regulated discharge to become Michigan Agriculture Environmental Assurance Program (MAEAP) verified in lieu of applying for coverage under the NPDES General Permit.

The intent of the ECOS agreement was to demonstrate an alternative to traditional permitting. The agreement is being evaluated and final comments are not scheduled to be reported until December 31, 2007. No matter what the final report shows, current Michigan law requires all farms with 700 or more cows to be permitted.

Informational Session

Permitting can be a complicated issue so the MDEQ is holding an

informational session on March 14, 2007 from 1-5 p.m. at the Holiday Inn South in Lansing to provide information to farmers on how to apply for permits and explain specific permit requirements. MDEQ will mail a meeting notice to all large CAFOs that are affected by the permit deadline.

The meeting is not just for farms that will be immediately affected by the change, it is also open to any producer wanting to learn more about the permitting system. Because we cannot predict the future of environmental policy in this state, MMPA urges any interested producer to consider attending this informational session so that they can be aware of what it takes to comply with the NPDES permit.

Producers who are considering expanding their operations to include 700 or more mature cows in the future will need to apply for permit coverage prior to their expansion and will benefit greatly from the information that will be covered by the MDEQ. Note that Michigan regulations require that an animal feeding operation that intends to expand to large CAFO size apply for a NPDES permit 180 days before becoming a large CAFO. Additional information on the meeting will appear in the March *Messenger*.

MMPA and MAEAP

MMPA believes MAEAP is an outstanding program that protects the environment. The cooperative continues to support our resolution encouraging all MMPA members, regardless of farm size, to become

verified under the MAEAP program.

Several MMPA Member Representatives are trained as MAEAP providers. All MMPA Member Representatives can help any MMPA member farm get started in MAEAP through the Progressive Planning program. Progressive Planning takes producers with medium and small sized operations through a step-by-step process which can lead to developing a Comprehensive Nutrient Management Plan (CNMP) at their own pace and eventually becoming MAEAP verified.

If you have questions regarding the permitting process, MAEAP or have other environmental concerns, please contact your MMPA Member Representative, MMPA Member Services Department, Michigan Department of Agriculture MAEAP Manager Jan Wilford at (517)-241-4730 or Michigan Department of Environmental Quality's Ronda Wuycheck at (517)-241-7832.

Under Michigan law, all large CAFOs must now apply for coverage under the NPDES General Permit