

## Appendix A. Respondents and Other Assumption

Description	Number	Notes
Percent CAFOs in ID, MA, NH, NM, and OK	6.3%	Nina J. Bonnelycke. Personal File. 7/16/2013
Percent CAFOs covered by General Permits	70.0%	
Annual CAFO inspection rate	20.0%	
Percent hearings for individual permits	12.0%	
%CAFOs where the permit authority require the NMP to be submitted w/ the application?	71.51%	
%CAFOs in authorized states where the permit authority does comprehensive technical review	42.40%	
Percent of NMP that would change enough to trigger review	11.00%	45% of facilities would modify their permit once per permit cycle (5 years). 0-10% would modify their permit twice. (A. Wiedeman, EPA)
Reduction in permit modifications due to the availability of the narrative rate approach	50%	ICR: NPDES and ELG Regulatory Revisions for Concentrated Animal Feeding Operations (Final Rule) OMB Control Number: 2040-0250. EPA ICR: 1989.06.
Authorized States for CAFOs	44	EPA retains authority for NPDES discharge permits for agricultural facilities in Oklahoma; thus, only 44 States are authorized to issue permits to CAFOs. EPA is not aware of any CAFOs in the U.S. Virgin Islands.
Authorized States for CAAP	46	State Program Status
Total Number of CAAP Permittees	359	From ICIS; excludes federal facilities
Flow Through and Recirculating Commercial Facilities	166	From ICIS; excludes federal facilities
Flow Through and Recirculating Non-Commercial Facilities	178	From ICIS; excludes federal facilities
Net Pen Facilities	15	From ICIS; excludes federal facilities
Total Number of CAAP Permittees in non-authorized states	100	From ICIS; excludes federal facilities
% of Permittees seeking General Permit Coverage	52%	From ICIS; excludes federal facilities
Burden to Develop/Update NMP - Feedlot cattle	157	ICR: NPDES and ELG Regulatory Revisions for Concentrated Animal Feeding Operations (Final Rule) OMB Control Number: 2040-0250. EPA ICR: 1989.06.
Burden to Develop/Update NMP - Dairy cows	19	
Burden to Develop/Update NMP - Hogs	56	
Burden to Develop/Update NMP - Horses/Ponies	54	
Burden to Develop/Update NMP - Turkeys	41	
Burden to Develop/Update NMP - Layer Chickens	14	
Burden to Develop/Update NMP - Broiler Chickens	10	
Burden to Develop/Update NMP - Ducks	22	
Burden to Collect and Send Soil Sample - Feedlot cattle	26.1	ICR: NPDES and ELG Regulatory Revisions for Concentrated Animal Feeding Operations (Final Rule) OMB Control Number: 2040-0250. EPA ICR: 1989.06.
Burden to Collect and Send Soil Sample - Dairy cows	3.2	
Burden to Collect and Send Soil Sample - Hogs	9.3	
Burden to Collect and Send Soil Sample - Horses/Ponies	8.9	
Burden to Collect and Send Soil Sample - Turkeys	6.8	
Burden to Collect and Send Soil Sample - Layer Chickens	2.4	
Burden to Collect and Send Soil Sample - Broiler Chickens	1.6	
Burden to Collect and Send Soil Sample - Ducks	3.6	
% of Facilities in Sector With Possible Discharges - Fed Cattle	85%	Assume that feedlots in southwestern regions (~15%) would not apply as precipitation is minimal and managed in evaporative ponds. Remainder of sector presumed to discharge due to prevalence of use of outdoor areas for animal confinement.
% of Facilities in Sector With Possible Discharges - Veal	67%	Assume that veal operations that use underground storage pits (~33%) would not apply. Remainder of sector presumed to discharge due to prevalence of use of outdoor areas for animal confinement.
% of Facilities in Sector With Possible Discharges - Heifer	80%	Assume that heifer feedlots in southwestern regions (~20%) would not apply as precipitation is minimal and managed in evaporative ponds. Remainder of sector presumed to discharge due to prevalence of use of outdoor areas for animal confinement.
% of Facilities in Sector With Possible Discharges - Dairy	100%	Assume that all dairies would apply since they have continual need for cleaning milk parlors with clean water, and dairies of this size are most likely to have an on-site lagoon.
% of Facilities in Sector With Possible Discharges - Hogs	72%	Assume that operations with evaporative lagoons (~273) and pits (~822) would not apply. [From Table C-3b of Cost Report]
% of Facilities in Sector With Possible Discharges - Broilers	10%	Estimated in TDD (Section 9.1.2.5) that 10% of Large Broiler operations would require a permit.

Description	Number	Notes
% of Facilities in Sector With Possible Discharges - Layers: Dry	10%	Dry layer operations typically have no exposure to rainfall and are generally not expected to discharge. Information from Region 5 enforcement activities in 2007, however, indicates the possibility of discharge from as many as 10% of the sector.
% of Facilities in Sector With Possible Discharges - Layers: Wet	100%	Wet layer operations are already subject to permitting requirements, and are assumed to run operations with high probability of discharge.
% of Facilities in Sector With Possible Discharges - Ducks	70%	Assume mid-Atlantic duck farms need permits because they use ponds and have discharges. Also a few in Midwest, although they use mostly dry manure systems. [References Indiana Poultry and the USDA Census of Ag.]
% of Facilities in Sector With Possible Discharges - Horses	84%	Appx. 93% of large horse farms are racetracks, but few use lagoons. Assume 90% would need a permit (APHIS Equine 98).
% of Facilities in Sector With Possible Discharges - Turkeys	10%	Similar to broilers, expect a small percentage (~10%) of operations would apply for a permit. Vast majority are under roof, with covered storage of manure, litter, and process wastewater.
% of Facilities in Sector With Possible Discharges - Medium-sized CAFOs	0%	Medium-sized CAFOs all discharge since they only became "defined" as CAFOs due to the existence of a discharge.

Notes: % of Facilities in Sector With Possible Discharges estimates come from the 2006 Waterkeeper proposed rule and the 2008 Waterkeeper final rule.