• Why DEP is proposing revisions
• Proposed changes
• What the proposed changes mean
• Timeline
• Support requested
DEP administrative and Ag Industry burden

- Annual Reports serving as annual Notices of Intent (NOI) increased DEP administrative burden and created a possibility of increased appeals
- Late Annual Reports resulted in expiration of permit coverage
- Late Annual Fees resulted in expiration of permit coverage

Fixing an error identified by Ag Industry representative after finalization

- Certain CAFOs were omitted in error from water line inspection
Proposed Changes

• Remove language indicating that the submission of a CAFO Annual Report will be considered a NOI

• Remove language stating that failure to submit a timely CAFO Annual Report and/or NOI fee will constitute expiration of coverage

• Clarify that the annual fee associated with PAG-12 General Permit coverage is an installment payment of the NOI fee.
  • This clarification will not result in additional fees or required payments.

• Clarify that DEP will provide further instruction as to the form of the NOI and the manner of submission for renewal of coverage at the end of the five-year permit term.

• Correct an error in Part A, clarifying that all Large CAFOs must perform daily water line inspections to be consistent with federal requirements
April 2020 – Reviewed proposed changes with EPA

May 2020 – Consult with the Agricultural Advisory Board and WRAC
  - Draft permit sent to board members via email following May meeting

June 2020 – Special meeting of Agricultural Advisory Board
  - Draft permit published immediately following special meeting with 30 day comment period

July – August 2020 – Draft responses to public comment

August – September 2020 – Consult with the Agricultural Advisory Board, Nutrient Management Advisory Board, and WRAC

October 2020 – Final general permit published

January 1, 2021 – NOI for PAG-12 coverage due
Agricultural Advisory Board support requested:

1. Support to move forward with proposed timeline for publishing the revised draft PAG-12 for public comment following discussion of the revised draft permit with AAB in June

2. Support for AAB consultation with DEP during and/or between public comment period and final publication
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