COMMONWEALTH OF PENNSYLVANIA
STATE CONSERVATION COMMISSION

DATE: December 6, 2013

TO: All Certified Odor Management Specialist

FROM: Frank X. Schneider, Director
            Nutrient and Odor Management Programs

            Karl Dymond
            Odor Management Program Coordinator

RE: Program Changes Effective January 1, 2014

The State Conservation Commission (SCC) has made significant changes to the Odor Management Program.

- On August 26, 2013, the Commission approved the OSI version 2.0 and the PA Odor BMP Reference List version 2.0.
- On November 12, 2013, the Commission approved the OMP version 3.0 Templates for the Standard Plan and the Plan Amendment

The use of the **OMP Version 3.0 Templates**, the **OSI Version 2.0**, and the **PA Odor BMP Reference List Version 2.0** will become mandatory on **January 1, 2014**. These documents can be used immediately, if desired, but must be used starting January 1, 2014 for all new OM plan submissions and plan amendments. Plan updates may continue to use the version of the OMP template that the original OM plan was developed in.

These documents can be downloaded from the Commission's Odor Management Program webpage (www.pda.state.pa.us/scc - Odor Management Program link), or you may contact Karl Dymond at kdymond@pa.gov for a copy. We encourage you to visit the OM Program webpage and review these new program products.

PA Odor BMP Reference List
The PA Odor BMP Reference List (Version 2.0) was reorganized and contains the following changes:
1. Level I Odor BMPs. The change involves simplifying the existing Level I Odor BMPs into 6 categories (Odor BMP Principles for reducing odor generation and/or transport), and requiring the planner and operator to detail how they will accomplish these Odor BMP Principles for their site specific scenario.

2. Level II Odor BMPs. These Odor BMPs are now in categories; animal housing, solid manure handling systems, and liquid manure handling systems. Additional specialized (Level II) Odor BMPs were added to the Reference List. These additional Odor BMPs are recommended by the PSU College of Agriculture technical advisors due to research

indicating that these specialized Odor BMPs can provide additional technology, practices, standards and strategies for odor management.

OSI

The OSI version 2.0 was updated to provide better credibility and liability protection to both the Operator and the SCC. OSI Version 2.0 changes include:

1. Evaluation Distance Area – The evaluation distance area is determined by the number of AEUs covered by the plan. The OSI version 2.0 will bring the AEUs number down from 600 to 500 for the maximum 3000' evaluation distance area.

2. Part A. Odor Source Factors
   a. Animal Species – This criterion has been taken out of Part A and added back in at the end of the OSI, as its own factor (Species Adjustment Factor); this provides a way to have the weighting of the Species Adjustment Factor more appropriately affect the receptors (the neighboring facilities and public use facilities in Part C) in the evaluation distance area (Total OSI = (Part A + Part C) – Part B x Species Adjustment Factor). Factors that changes include:
      i. Swine, Duck, Veal: 0.15 multiplier factor; this is a slight increase
      ii. Layers, Pullets, Cattle: multiplier factor stayed the same
      iii. Broilers, Turkeys: (-) 0.1 multiplier factor; this is a slight decrease
      iv. Horse: (-) 0.5 multiplier factor; this is a large decrease.

   b. Manure Storage -
      i. Changed name to Manure Handling System. The reasoning behind this change is to clarify how the manure is handled and stored.
      ii. Changed categories and point values. Simplified the manure handling system types into 4 categories and used a linear weighting of points (i.e. Category 1 =2 points, Cat. 2 = 4 points, Cat. 3 = 8 points, Cat. 4 = 16 points).

3. Part B: Site Land Use Factors
   These factors follow the principle of rewarding the operator via discounted points for any qualifying special agricultural land use designations. The change went from outright negative point values to a percent discount so as to prevent negative OSI total scores.

4. Part C: Surrounding land Use Factors
   The criterion for the "Other Livestock" deleted the "5 or More" category so as to prevent negative OSI total scores.

OMP Templates

The OMP templates for the Standard Plan and the Plan Amendment were updated in order to provide consistency with the newly approved OSI Version 2.0 and the PA Odor BMP Reference List Version 2.0. Specifically, these changes are to the documentation section of the plan templates to include:

1. The new "Odor BMP Implementation Commitment Statement" page that the operator will sign annually (attesting to the Odor BMPs implementation subject to penalties relating to unsworn falsifications) (Page 6 of OMP template and Page 9 of OMP Amendment Template).

2. The modification of the "Level I Odor BMP Quarterly Observation Log" to become a true maintenance log (Page 7 of OMP template and Page 10 of OMP Amendment Template).

3. The "Previously Approved – Currently Regulated" sections in the Version 2.0 Plan Amendment Template was reworded to provide better clarification; it is now titled "Currently Regulated" (page 12 of OMP Amendment Template). Clarification was added in the instructions for this sections relating to previously approved OMPs that proposed multiple regulated facilities, but for which not all proposed facilities were constructed. The clarification now instructs the plan writer to only detail those facilities that were previously approved and that have been constructed.

Level I Odor BMP Threshold
A major change between the 3 new documents (PA Odor BMP Reference List 2.0, OSI Version 2.0, and OMP Templates 3.0) is the requirement to implement Level I Odor BMPs, whenever the following are met:
   i. If there are any neighboring facilities or any public use facilities in the evaluation distance area. A one page attestment form (Odor BMP Implementation Commitment Statement) is to be documented annually, but no maintenance logs are required to be kept.
   ii. Under the new evaluation, if the score is 50 or more, then the Level I Odor BMPs (as described above) must be implemented, the one page attestment form (Odor BMP Implementation Commitment Statement) is to be documented annually, and maintenance logs are required to be kept.

OM CEC Training
SCC and the Pennsylvania State University (Penn State) staff are planning to conduct a webinar on these OM Program changes; OM CECs will be provided for this training. The webinar is scheduled for January 21 2014, and on January 23 2014; both days from 10:00am to 11:00am. Please go to www.paplants.state.pa.us for more information on OM CEC training and to get registered. The webinar training will be at the following web address: https://meeting.psu.edu/odormanagement/. You may need to create a Friends of Penn State account (https://fps.psu.edu/) to get into the webinar.

Updating the Technical Manual
SCC staff is in the process of developing a new OM Program Guidance/ Technical Manual. This updated manual will be a combination of the current Technical Manual and current Program Guidance. It is expected that the SCC will be sending a draft version of the OM Program Guidance/ Technical Manual to you for a 45 day public comment period in January 2014 with an expected approval and effective date of July 2014.

If you have any questions, feel free to contact us.