APPENDIX A: PREAMBLE CORRECTION

Two corrections have been made since the signing of the MPP preamble. Corrections are noted as follows: Black line strikeouts (shown as: ~~black line strikouts~~) represent original text that has been removed. Redline strikeouts (shown as: redlined text) represent newly added text.

The first correction is a typo found in the "Sample" column of Table IX.G-1 (page 155). The value of 21, should actually be 28.

Table IX.G-1: Modeled Environmental Benefits (97 facilities)

Scenario	Regulatory Options	Pollutant [1] Load (million lbs/yr)	Pollutant Reduction (percent)	Overall use improvement [2] (reach miles)	
				Sample	National
Baseline		49.9			
1	BAT2	47.5	5%	17	~~29~~ 116
2	BAT3	45.0	10%	21	~~36~~ 143
3	BAT4	44.8	10%	21	~~36~~ 143
4	BAT2 + PSES1	36.2	27%	24	~~41~~ 200
5	BAT3 + PSES1	33.7	32%	28	~~48~~ 227
6	BAT4 + PSES1	33.5	33%	~~21~~ 28	~~36~~ 227
7	BAT3 (meat, poultry), BAT2 (Rendering)	45.1	10%	21	~~36~~ 143
8	BAT3 (meat, poultry), BAT2 (Rendering) + PSES1	33.7	32%	28	~~48~~ 227

Note 1: Baseline = 49.9 Million lbs/yr. Pound totals include BOD, TSS, Nitrogen, Phosphorus and TKN from 97 facilities. Some overlap between categories may be occurring

Note 2: Sample set represents 97 facilities (36 direct and 61 indirect). National set represents 246 direct and 731 indirect discharger facilities. ~~Of the 246 facilities represented, 79 facilities are zero dischargers, and therefore do not contribute to these modeled water quality impacts / improvements.~~

The second correction has to do with the scale-up of the overall use improvement to the national level. EPA originally used a scale-up factor of 1.72 which incorrectly assumed that the 246 facilities covered by this rule, consisted of both direct, indirect and land applying (or zero discharger) facilities. The calculation was done as follows:

$$\text{Scaling Factor} = \frac{\text{246 (Facilities in scope) - 79 (zero dischargers)}}{\text{97 (Modeled Facilites)}} = \mathbf{1.72}$$

The 246 facilities are actually the direct dischargers in scope of this rule. Therefore a scale-up factor for the direct dischargers based on a simple ratio of the **total number of directs (246)** to the **number of directs modeled (36)** is **6.83**, or

$$\text{Scaling Factor}_{\text{direct dischargers}} = \frac{246\ (\text{in scope}_{\text{direct dischargers}})}{36\ (\text{modeled}_{\text{direct dischargers}})} = \mathbf{6.83}$$

An example calculation of scaling BAT3 overall use improvement to the national level is as follows:

$$\text{Use Improvement BAT3}_{\text{national}} = \text{BAT3}_{\text{sample}} \times \text{Scaling Factor}_{\text{direct dischargers}} = 21\ \text{mi.} \times 6.83 = 143\ \text{mi}$$

EPA estimates that 731 indirect facilities are in-scope of the PSES1 option. Therefore,

the scale-up factor for indirect dischargers based on a simple ratio of the **total number of indirects (731)** to the **number indirects modeled (61)** is **11.98**, or

$$\text{Scaling Factor}_{\text{indirect dischargers}} = \frac{731\ (\text{in scope}_{\text{indirect dischargers}})}{61\ (\text{modeled}_{\text{indirect dischargers}})} = \mathbf{11.98}$$

An example calculation of scaling PSES1 overall use improvement to the national level is as follows:

$$\text{PSES1 Use Improvement}_{\text{sample}} = (\text{BAT3+PSES1})_{\text{sample}} - \text{BAT3}_{\text{sample}}$$
$$= 28\ \text{mi} - 21\ \text{mi}$$
$$= 7\ \text{mi}$$

$$\text{PSES1 Use Improvement}_{\text{national}} = \text{PSES1}_{\text{sample}} \times \text{Scaling Factor}_{\text{indirect dischargers}}$$
$$= 7\ \text{mi} \times 11.98$$
$$= 84\ \text{mi}$$

An example calculation of the scale-up of BAT3 + PSES1 overall use improvement to the national level is as follows:

$$(\text{BAT3} + \text{PSES1})_{\text{national}} = \text{BAT3}_{\text{national}} + \text{PSES1}_{\text{national}}$$
$$= 143\ \text{mi} + 84\ \text{mi}$$
$$= 227\ \text{mi}$$

As a result of this correction to the scaling methodology, EPA updated preamble Table IX.G-1 (see table above). EPA also corrects the following two sentences found in the preamble:

(page 150): " EPA estimates the national improvement in overall use to be ~~29~~ 116 to ~~49~~ 227 reach miles.

(page 154): "The recommended treatment option would result in the over-all use improvement of 21 river miles at the sample set, and approximately ~~36~~ 143 miles at the national level."