



Manure Management Plan Frequently Asked Questions (FAQ)

July 2026

Version 1.2

Background

Every agricultural operation, as defined in 25 Pa. Code § 91.1 and 3 Pa.C.S. § 503, in Pennsylvania that land applies manure or agricultural process wastewater (generated on the agricultural operation or received from an importer), regardless of size, is required by 25 Pa. Code § 91.36(b) to have and implement a written Manure Management Plan. This includes manure and agricultural process wastewater application by various types of equipment and/or direct application of manure by animals on pastures and in ACAs. To assist the regulated community with guidance on how to develop a Manure Management Plan, DEP developed *Land Application of Manure-A Supplement to Manure Management for Environmental Protection*. In April of 2024, DEP published revisions to the *Land Application of Manure* supplement. The purpose of this FAQ document is to provide additional information since the 2024 revisions of *Land Application of Manure* related to the regulatory requirements to develop a Manure Management Plan. This FAQ document will be updated with additional questions and answers over time.

Nothing in this document affects regulatory requirements. The interpretations herein are not an adjudication or a regulation. There is no intent on the part of DEP to give the interpretations in this document that weight or deference. This document provides a framework within which DEP and delegated county conservation districts (CCDs) will exercise administrative discretion in the future. DEP reserves the discretion to deviate from the interpretations in this document if circumstances warrant.

Manure Management Plan Workbook

FAQ #1: Is water used to wash produce, such as fruits and vegetables, considered Agricultural Process Wastewater?

Agricultural process wastewater is defined as wastewater from agricultural operations, including from spillage or overflow from livestock or poultry watering systems, washing, cleaning or flushing pens, milkhouses, barns, manure pits, direct contact swimming, washing or spray cooling of livestock or poultry, egg washing or dust control. Based on the definition of agricultural process wastewater that is included in the glossary and is taken from 25 Pa Code §

91.1, water that is used for the washing of produce is considered agricultural process wastewater and should be managed as such on agricultural operations and treated as agricultural process wastewater in the Manure Management Plan.

FAQ #2: Can additional space be added to the AEU sheet? It works for farms that only have a few types of livestock, but many of our Amish producers have a little bit of everything and there is not enough space in the workbook for these. We have just been attaching a separate page with the AEU calculations.

It is acceptable to use more than one Animals Worksheet to accommodate the amount of animal groups on the operation. The AEU Calculation Spreadsheet, available on DEP's Agriculture Compliance website, can be used as part of the Manure Management Plan. This spreadsheet provides space for up to 17 separate animal groups. If all of the information is entered into the spreadsheet, including total acres for manure application, this spreadsheet can be used as a substitute for the Animals Worksheet in the plan. After entering the required information, this spreadsheet can then be printed with the print setting set to fit sheet on one page. The printed page can then be inserted into the plan. The DEP Agriculture Compliance website can be found at the link directly below:

<https://www.pa.gov/agencies/dep/programs-and-services/water/bwrnsm/nonpoint-source/agriculture-compliance.html>

FAQ #3: Are soil tests needed for the winter application worksheet?

For a Manure Management Plan, soil tests are not a requirement to be able to apply manure during the winter.

FAQ #4: A soil test result showing soil P levels less than 200 ppm is required to use Nutrient Balance Sheets with the Option 2 Nitrogen Requirement. How many acres of land can a soil test based on one sample represent in a Manure Management Plan?

It is recommended that a single soil test sample not represent more than 20 acres. One soil test sample can represent multiple fields grouped in a crop management unit (must have similar soil capabilities and management histories) as long as the sample does not represent more than 20 acres. If a single field is larger than 20 acres, a single soil test sample may be used to represent this field.

FAQ #5: On page 8, can we put multiple seasons in the seasons category if the type and rate are the same? Similarly to the AEU sheet, this page is only useful for very simple operations. We have been making up nutrient balance sheets for most operations.

Multiple season applications may be listed on the Plan Summary if all of the information is exactly the same for each season's application. If any of the information for the applications is not going to be the same for each application, such as the fields applied to, crop group, or incorporation timing, then the manure applications should be listed on separate lines.

FAQ #6: The charts in Appendix 1 lack detail in terms of crop specificity—for example, what qualifies as grass/hay?

In reference to the charts in Appendix 1, we recommend following the types of crops listed in the Penn State University Agronomy Guide. In the Agronomy Guide, the terms Small Grains and Small Grain Silage refers to; Oats, Barley, Wheat, Buckwheat, Rye, Triticale, and Spelt. Cool-Season Grass Hay lists the following: Orchardgrass, Bromegrass, Timothy, Reed Canarygrass, Tall Fescue, Perennial Ryegrass, and Festulolium.

FAQ #7: Is a plan required to include the Nutrient Balance Sheet (NBS) calculations for the plan to be considered admin complete?

Any plan that utilizes a NBS to determine their manure application rates should include those calculations with the plan in order for the plan to be considered administratively complete.

FAQ #8: Can a plan substitute the NBS summary page in place of the Manure Management Plan Summary page?

A fully completed NBS summary page may be substituted in place of the Manure Management Plan Summary page if the NBS summary page contains all of the planned manure application for the operation.

DEP has collaborated with staff from the Penn State Nutrient Management Education Program to develop a Nutrient Balance Sheet spreadsheet intended to be used for Manure Management Plans. With this spreadsheet, after the user has input the information, they will then be able to print a Manure Management Plan Summary and Winter Manure Application Summary directly from the spreadsheet. The printouts will mirror the information that is on the Manure Management Plan Summary and the Winter Manure Application Summary in the Manure Management Plan Workbook. The Manure Management Plan Nutrient Balance Sheet Spreadsheet will be available for download in the Resources section of the Manure Management Plan Workbook Course linked below.

Clean Water Academy: Manure Management Plan Workbook and Short Form Course
<https://pacleanwateracademy.remote-learner.net/course/view.php?id=1308>

FAQ #9: If an agricultural operation with an approved Nutrient Management Plan (NMP) under Act 38 is exporting manure to an operation with a Manure Management Plan (MMP) under 25 Pa. Code Chapter 91, may that manure be applied at a rate that exceeds the winter manure application rates in the MMP?

Yes. Manure can be applied at a rate above the winter manure application rates of 5,000 gallons/acres, which is set in the Land Application of Manure: A Supplement to Manure Management for Environmental Protection if the exporting operation developed a Nutrient Balance Sheet (NBS) that calculates the importing operation's winter manure application rates as part of a recently approved/updated NMP. The exported manure may then be applied at the rate in the NBS that was a part of the approved or recently updated NMP.

This situation is limited to only the manure that was exported from the Act 38 operation with a NMP and included in an accompanying NBS. An operation with an MMP may not apply their own generated manure or manure imported from another operation with an MMP at a rate above

the maximum winter manure application rates of 5,000 gallons/acre.. Additionally, all manure generated by an operation with an MMP and/or manure, the manure imported by that operation from another operation with an MMP must be included in the importing operation's MMP, which has a maximum winter manure application rate of 5,000 gallons/acre.

FAQ #10: How do we complete the Animal Concentration Area (ACA) Worksheet?

Section 1 of the ACA worksheet should be completed if the operation has contacted someone for technical assistance with managing the ACAs on the operation. Examples of technical assistance include a Conservation District, NRCS or private consultant. In section 1, write the name of the person that was contacted for assistance and the date that the person was contacted.

In Section 2 of the ACA worksheet, the plan writer should write a brief description of how the ACAs are managed on the operation. An example of this from the MMP Workbook is "Installation of gutters and downspouts and heavy use area protection directing water to the concrete tank manure storage facility in the summer of 2022. Installation of fencing and stream crossing to locate congregation areas away from the stream."

Section 3 of the ACA Worksheet is the BMP Implementation Schedule table that must be completed. Each ACA on the operation should be listed on the table. If an operation has multiple ACAs on the operation, then list each of them and input the separate information for each ACA. The columns in the ACA worksheet should be completed as follows:

- In the 1st column, the writer should list the name of the ACA.
- In the 2nd Column, the writer should list the date that clean water was diverted around that ACA and the number of systems used to do so. Each BMP involved with diverting clean water is considered 1 system. If an ACA had gutters to divert barn roof runoff and an upslope diversion to divert water runoff around the ACA, then that would be considered 2 systems because there are 2 BMPs involved in diverting the water around the ACA.
- The 3rd column refers to if the ACA has an improved and stabilized surface, if it does then the writer should list the date that it was implemented and the estimated size of the improved and stabilized surface.
- The 4th column is asking if the polluted runoff from the ACA has been directed to a storage system or a vegetated treatment area. If yes, then the writer should put the date that it was completed.
- The 5th column is asking if animals have limited access to streams by utilizing stabilized crossings and water areas. If it does, then the writer should list the date that it was completed.
- The 6th column is asking if steps have been taken to limit the size of the denuded areas associated with that ACA. The writer should indicate whether that has been done. The acceptable answers for this question are "yes" or "no".
- The 7th column is asking if steps have been taken to move animal congregation areas away from streams, associated with that ACA. If this has been done for that ACA, then the plan writer should list the date that it was implemented.

Example of completed BMP Implementation Schedule Table:

ACA Name or Location (Refer to Operation Map)		Divert clean water around ACA (Number of Systems)	Improve and stabilize the surface material of the ACA (Sq. Ft)	Direct polluted water to storage or vegetated treatment area	Limit access to streams through stabilized crossings and watering areas	Limit size of denuded areas	Locate area where animals congregate (feed areas, shade, etc.) away from streams
ACA #1	Date	07/15/22	04/01/2023	07/15/22	07/15/2022	Yes	07/15/22
	Amount	1 System	3000 sq ft.				

FAQ #11: Can agricultural process wastewater (including milkhouse wastewater) be disposed of/discharged to an on-lot septic system?

No, on-lot sewage systems are designed to collect, treat, and dispose of domestic sewage at established flow rates. Agricultural process wastewater should not be placed in an on-lot sewage system since the wastewater may contain substances that cannot be adequately treated by the system. Disposal of inadequately treated wastewater may result in an unlawful discharge to waters of the Commonwealth, which includes groundwater, in violation of Pennsylvania's Clean Streams Law (35 P. S. § § 691.1— 691.801) and corresponding regulations, such as 25 Pa. Code § 91.36 (c). Additionally, such disposal may violate the Solid Waste Management Act (35 P.S. §§ 6018.101—6018.1003).

Subsurface disposal of agricultural process wastewater as part of normal farming operations can only be authorized through a Department Water Quality Management Permit issued under Chapter 91. If a Water Quality Management Permit is unable to be obtained, then the discharge must cease and the agricultural process wastewater will need to be: 1) collected and stored in a manure storage facility (with or without manure) for land application in accordance with a MMP or NMP; or 2) treated with an appropriate best management practice that meets NRCS standards and specifications.

Manure Management Plan Short Form

FAQ #12: Is the 8,000 pounds for Question a based on overall weight or overall annualized AEUs for the operation?

For this question on the Short Form, if the operation exceeds 8,000lbs of livestock weight at any point of the year then that operation is not eligible to utilize the Short Form.

FAQ #13: If an operation exports a portion or all of their manure to another operation, are they eligible to use the Short Form?

An operation that exports a portion or all of its manure may utilize the Short Form, so as that the manure is being exported to another operation that land applies it according to a Manure or Nutrient Management Plan, or the manure is exported to a permitted waste disposal facility.

FAQ #14: If an operation has a concrete barnyard, are they eligible to utilize the Short Form?

An operation with a concrete barnyard may utilize the Short Form if the concrete area is able to be maintained to prevent the flow of manure and contaminated runoff to streams, lakes, springs, ponds, or open sinkholes.

Version History

Date	Version	Revision Reason
03/03/2025	1.0	Original
08/01/2025	1.1	Revised FAQ #1
07/01/2026	1.2	Added FAQ #4, 9, and 11