



# Dry Bulk Animal Nutrient IDALS Chapter 200A

ICA Fact Sheet  
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Created by Iowa code, Chapter 200A is one of three methods of selling manure that will qualify as a producer's manure management plan (MMP) for confinement operations. After the adoption of a new DNR rule in December of 2016, Chapter 200A can qualify as a producer's nutrient management plan (NMP) for open feedlot solid manure. Chapter 200A allows the regulation by the Iowa Department of Agriculture and Land Stewardship (IDALS) of certain dry bulk animal manure (unmanipulated, which means not processed including not adding ingredients such as composting) for application to cropland. Product that meets the definition of "dry" and "manure" can be sold under Chapter 200A:

- Contains one or more recognized plant nutrients
- Promotes plant growth
- Does not flow perceptibly under pressure
- Not capable of being transported through a mechanical pumping device designed to move liquid
- Constituent molecules do not flow freely among themselves, but do show a tendency to separate under stress.

Under previous DNR rules, only dry manure from cattle confinements sold under Chapter 200A qualifies as an MMP. Now, scraped and settled solids from an open feedlot sold under 200A also qualify as an NMP for the solids sold. Manipulated manure may be sold under Chapter 200 of the Iowa Administrative Code which is regulated through IDALS as a fertilizer or soil conditioner. Dry manure sold under Chapter 200A does not require secondary containment as is required for fertilizer or soil conditioners under Chapter 200.

## **Open Feedlot Nutrient Management Plan Requirements following adoption of DNR Rule.**

Open feedlot operations can only sell scraped solids or settleable solids as a dry bulk animal nutrient product under Chapter 200A. Under the proposed DNR rule, a feedlot using Chapter 200A as its NMP must submit to the Iowa Department of Natural Resources (IDNR):

- A copy of the operation's site-specific IDALS 200A license or documentation for any scraped solids or settleable solids that will be sold under Chapter 200A
- IDNR-approved NMP form for sales of scraped solids or settleable solids

The open feedlot will need to maintain their NMP for the liquid effluent portion of their manure management system.

## **Dry Bedded Confinement Manure Management Plan Requirements**

Dry manure confined cattle feeding operations can sell their manure as a dry bulk animal nutrient product under Chapter 200A. To qualify for a confinement feeding operation, the area in which the cattle are housed must be completely under roof or have an outside area of less than 10% of the area under roof. A dry bedded confinement cattle operation using Chapter 200A as its MMP must submit to the IDNR:

- A copy of the operation's site-specific IDALS license or documentation for any dry manure that will be sold under Chapter 200A
- IDNR-approved MMP form for sales of dry manure

### **Open/Confined Feedlot without a NMP or MMP**

For non-permitted open feedlots under 1,000 AUC, there is no requirement for an NMP. Therefore producers can choose to sell dry manure under Chapter 200 or 200A, but are not required to do so to comply with DNR rules. The same is true for dry confinement facilities under 500 AUC because they are not required to have an MMP.

In both cases, it may be beneficial to sell manure from these types of facilities via a private contract to protect the seller, but it is not necessary.

### **Manure Content Requirements**

Manure sold under Chapter 200A requires a guaranteed analysis and the number of tons purchased. The guaranteed analysis must include:

- Total Nitrogen (N)
- Available Phosphate (P) or P[2]O[5] or both
- Soluble Potassium (K) or K[2] or both

Application of dry bulk animal nutrient should not exceed a rate at which provides the nitrogen necessary to obtain optimum crop yields for the crop being grown based on recommended crop nitrogen use rate factors. Acreage calculations are based on a per acre application rate that will supply the total nitrogen needed to produce a corn crop with a yield equal to the average corn yield for the county in which the application is planned. The calculation assumes 60% of the applied nitrogen is available in the first crop year following application and takes into account application losses.

### **Dry Bulk Animal Nutrient Distributor License**

Three parties are involved in the sale of dry bulk animal nutrient product. The livestock producer who owns the production facility, the distributor (cannot be the producer) who delivers the product and land applies it for the purchaser, a crop producer who cannot be the livestock producer. The producer and the distributor must both obtain a license from the Secretary of Agriculture and shall pay a license fee. The license certifies the distributor is responsible for marketing the dry bulk animal nutrients with a labeled laboratory analysis.

The producer license application must be accompanied with a product registration application and a laboratory analysis of the product. If the license applicant is both a producer and a distributor, the applicant is not eligible for the 200A program and must submit an MMP (or NMP if the proposed DNR rule is adopted) to the IDNR.

### **ICA's Role**

The Iowa Cattlemen's Association has been engaged on this issue since the inception of 200A. As mentioned, Chapter 200A was originally intended for dry livestock confinement facilities. ICA members and leaders submitted comments to the Environmental Protection Commission and advocated for approval of the expanded Chapter 200A rules.