



The Honorable Michael S. Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

March 25, 2024

RE: Protecting America's waterways from slaughterhouse pollution (Docket ID No. EPA-HQ-OW-2021-0736)

Dear Administrator Regan,

On behalf of millions of Americans who care about clean water and public health, we urge the U.S. Environmental Protection Agency (EPA) to adopt stronger standards to reduce water pollution from Meat and Poultry Processing (MPP) plants.¹ More specifically, the EPA should adopt Effluent Limitation Guidelines (ELGs) and pretreatment standards at least as strong as Option 3, which would curb slaughterhouse pollution by an estimated 322 million pounds per year.² The agency should also establish direct limits on E. coli and stop chloride pollution from these facilities. Finally, EPA must set a three-year deadline for compliance with these new standards, as required by the Clean Water Act.³

Meat and poultry processing plants are huge sources of water pollution. Pollution from these facilities contributes to toxic algal outbreaks, fish kills, dead zones, drinking water contamination and fecal bacteria that can make swimmers sick.⁴ More than 60 million Americans live downstream from where slaughterhouses dump their pollution into our waterways.⁵

While the proposed rule would begin to address this slaughterhouse pollution, it would fall short of the pollution reductions the Clean Water Act demands and our rivers and downstream communities deserve. The EPA's preferred alternative - Option 1 - would only apply to 845 out of 3879 slaughterhouses that directly or indirectly release water

¹ For the purpose of simplicity, we use "slaughterhouse" in this letter to describe the range of facilities covered by these ELGs, including rendering and pet food manufacturing facilities.

² See [Proposed Rule](#) at 4504, Table IX-1 (showing a net annual reduction of 322 million pounds of N, P and conventional pollutants from Option 3.)

³ 33 U.S.C. §§ 1311(b)(2)(C)-(D), 1317(b))

⁴ For example, see [Clean Water Act Effluent Limitations Guidelines and Standards for the Meat and Poultry Products Point Source Category](#) ("Proposed Rule") at 4480: "Around 120 of the estimated 150 direct dischargers discharge to waters listed as impaired, with much of the MPP total nitrogen and total phosphorus load discharging to waters impaired for algal growth, ammonia, nutrients, and/or oxygen depletion."

⁵ EPA's [Environmental Assessment](#) at 7-10

pollution - leaving 78% of these facilities unregulated. It would set no limits on nitrogen and phosphorus for facilities that send their waste to sewage treatment plants (called “indirect dischargers”), even though “EPA found that the MPP industry discharges the highest phosphorus levels and second highest nitrogen levels of all industrial categories.”⁶

In contrast, Option 3 would require modern pollution controls for roughly twice as many facilities (1620)⁷ and limit nitrogen and phosphorus pollution from at least the largest indirect dischargers. As a result, Option 3 would curb slaughterhouse pollution by 322 million pounds per year - more than three times as much as Option 1.⁸

This difference in slaughterhouse pollution reductions from these options is even more dramatic when it comes to nitrogen and phosphorus, which are key drivers of toxic algal outbreaks and dead zones. Nitrates - a form of nitrogen dumped by slaughterhouses in huge volumes - are linked to some cancers and blue baby syndrome, putting our drinking water at risk. Option 3 would reduce slaughterhouse releases of N and P by 85%, whereas Option 1 would only curb this pollution by 15%.⁹

Much of Option 3’s greater pollution reduction would come from requiring indirect dischargers to pre-treat their waste before sending it to sewage treatment plants. These standards are crucial because, according to EPA’s own analysis, sewage plants often release pollution they receive from slaughterhouses into our rivers. Seventy-three percent of the treatment plants receiving slaughterhouse pollution reviewed by EPA had permit violations for pollutants found in the industry’s wastewater - including not only nitrogen and phosphorus but also pathogens, metals and grease.¹⁰ And the problem is even worse than these violations indicate because a majority of these sewage plants do not even have pollution limits for nitrogen or phosphorus.¹¹

The pollution reductions from Option 3 would also benefit far more waterways and its people. More than 22 million Americans downstream from slaughterhouse pollution would benefit from these more stringent standards for nitrogen and phosphorus, versus 1.3 million people who would experience cleaner water under Option 1.¹²

⁶ [Proposed Rule](#) at 4480.

⁷ See [Proposed Rule](#) at 4487, Table VII-1.

⁸ See [Proposed Rule](#) at 4504, Table IX-1.

⁹ See [Technical Development Document](#) at Table 11-3 (EPA estimates that slaughterhouses generate 112,000,000 lbs./year of nutrient pollution; Option 1 would remove 16,500,000 lbs./year; and Option 3 would remove 95,700,000 lbs./year.)

¹⁰ [Proposed Rule](#) at 4480-81; EPA, [Analyzing Relationships between MPP Discharges and POTWs](#) at 11-12 (Aug 31, 2021) (EPA-HQ-OW-2021-0547-0110)

¹¹ See [Proposed Rule](#) at 4480.

¹² See EPA’s [Environmental Assessment](#) at 7-10

According to EPA, “[a]ll three options would minimize impacts to small firms.”¹³ So it’s hard to see why anyone would choose ELGs and pretreatment standards with dramatically less improvements to clean water than Option 3.

For nearly 20 years, even the largest meat and poultry processing facilities have avoided the full costs of keeping their pollution out of America’s waters. “Smaller” processors have evaded this responsibility since 1975. In fact, most slaughterhouse facilities have shifted this burden to the public by sending their wastewater to sewage plants for treatment. Meanwhile, U.S. taxpayers recently gifted [half a billion dollars in USDA funding](#) to the slaughterhouse industry. Clean water is the least we can expect in return for this massive subsidy.

In short, the industry’s water pollution bill is long overdue. And with new meat and poultry processing plants coming on line across the country, the slaughterhouse pollution problem will only get worse until EPA acts.

To ensure clean water, the EPA must ensure that the slaughterhouse industry pays this debt in full - by requiring at least the modern pollution controls in Option 3 that better safeguard our rivers and our health.

Sincerely,

Environment America Research & Policy Center
Holy Spirit Missionary Sisters, USA-JPIC
Animal Legal Defense Fund
The Humane Society of the United States
Socially Responsible Agriculture Project

Center for Food Safety
GreenLatinos
Environmental Integrity Project
Public Citizen
River Network

Southern Environmental Law Center
Alliance for the Great Lakes
Religious Coalition for the Great Lakes
Izaak Walton League of America, Great Lakes Committee

Chesapeake Legal Alliance
Environmental Law & Policy Center
Mississippi River Collaborative
Southern Coalition for Social Justice

Alaska Environment

Environment Arizona

Endangered Habitats League (CA)
Comite Civico del Valle (CA)

Environment California

Environment Colorado

Environment Connecticut

¹³ [Proposed Rule](#) at 4476.

Environment Florida	Kissimmee Waterkeeper (FL)
Environment Georgia	Science for Georgia
Environment Iowa	
Environment Illinois Research & Education Center Committee on the Middle Fork Vermilion River	Illinois Div., Izaak Walton League
Indiana Sportsmens Roundtable	Kentucky Waterways Alliance
Massachusetts Rivers Alliance	Environment Massachusetts
Environment Maryland ShoreRivers (MD) Catoctin Land Trust (MD)	Blue Water Baltimore The 6th Branch (MD)
Environment Maine	
For Love of Water (FLOW) (MI) Citizens' Resistance at Fermi Two (CRAFT) (MI)	Environment Michigan
Minnesota Division, Izaak Walton League of America	Environment Minnesota
Environment Montana	
Environment North Carolina Down East Coal Ash Environmental and Social Justice Coalition (NC)	Coastal Carolina Riverwatch
Amigos Bravos (NM)	Environment New Mexico
Environment New York Western New York Environmental Alliance	Western NY Trout Unlimited Genesee Valley Audubon Society
Environment New Hampshire Environment Nevada	Environment New Jersey
Ohio River Foundation Lake Erie Foundation The Junction Coalition (OH)	Environment Ohio Lake Erie Advocates Lake Erie Charter Boat Association
Environment Oregon	

PennEnvironment
Humane Action Pittsburgh
Chestnut Hill United Church (PA)
Pennsylvania Interfaith Power & Light
Adventure Explorations (PA)
Central Pennsylvania Conservancy
Climate Reality Project: Susquehanna Valley PA Chapter

Environment Rhode Island

Greater Edwards Aquifer Alliance
Surfrider Foundation - Texas Coastal Bend Chapter

Environment Virginia
Upper Mon River Association (WV)

Wisconsin Environment
SOH2O (WI)
Milwaukee Riverkeeper

Move Past Plastic (PA)
Allegheny Land Trust (PA)
Venango PaSEC (PA)
East Coventry Advocacy (PA)
Sustainable Choices, LLC (PA)

Winyah Rivers Alliance (SC)

Environment Texas

Environment Washington

Clean Wisconsin
River Revitalization Foundation (WI)