

Agenda

Proposed*

- Proposed ruling will update water quality criteria for livestock protection. This presentation addresses the constituents:
 - Current Sulfate 3,000 mg/L → 1000 mg/L ✓ Sodium (none) → 1000 mg/L

What are we trying to protect?

Prevent a "measurable decrease" in livestock production (Appx H, a, p H-1, draft Ag. Use Protection).



Livestock is a commodity - effects should have livestock industry values in mind

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Relevant Toxicological Endpoints

- Growth weight gain; prevention of loss
 - Intake rates (water, food) are not adequate measures of growth
 - Individual intake rates do not predict growth: Zinn 1994, Hickman 2002, Schwartzkopf-Genswein 2004; Grout et al. 2006; Loneragan et al. 2001; Johnson and Patterson 2004
- Reproduction calving rates, etc Indirect measures are not clear.
- <u>Acute effects</u> short term (<96 hrs); affects marketability (disease, PEM, blindness, death)

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A Review – Hunter 2007, 2008

- Incorporated all references provided by Raisbeck et al.
- Expanded database: over 200 citations reviewed in total.
- All literature considered for further analysis had to meet minimum criteria:
 - Peer-reviewed
 - Relevant endpoints: growth, reproduction, acute
 - Normal nutrition levels
 - Water quality consistent with current WY stds or EPA criteria
- Water quality thresholds determined by taking into account typical sodium, sulfate levels in WY forage







A Literature Review is not Enough Wyoming conditions differ from toxicity studies Johnson and Patterson (2004) Adaptation / inc'd tolerance can occur w/o long-term adverse effects

Why Is It Important?

⁴ NRC (1974), Spafford (1941), Ballantyne (1957)

Livestock Producers in Bighorn and Powder River basins Thanks to: Flitners, McCarty, Patterson, Shepperson, Schlaf, Meike, and others

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Livestock Producers' experiences Thanks to: Flitners, McCarty, Patterson, Shepperson, Schlaf, Meike, and others

- No negative effects on livestock (cattle, sheep, horses) that drank water containing: ^ℓ Sulfates ≤ 3,100 mg/L ✓ Sodium ≤ 2,500 mg/L No.
- Adverse effects apparent when exposed to: ✓ Sulfates ≥ 4,000 mg/L [✓] Sodium ≥ 6,000 mg/L



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Livestock Producers' experiences Thanks to: Flitners, McCarty, Patterson, Shepperson, Schlaf, Meike, and others

۲ Flitners: 7-year weaning rate averages as good or better w/ produced water 2,700 mg/L sulfate 1000 mg/L sodium Mr. McCarty: No adverse effects w/ produced water Dry Creek Potato Ridge Year 501 467 487 522 515 498 526 526 ZC 498 484 493 493

An Overwhelming Weight of Evidence: Current standards protect livestock

- Our independent review shows 3,500 mg/L sodium, 3,000 mg/L sulfate will not cause measurable decrease in livestock production
 <u>NRC 1980, 2005 Sodium;</u>

 4% NACI is upper limit in cattle, sheep = ~10,000 mg/L Na per day
 Range: 6,700 pm (poultry) to 23,600 ppm (horses)

 <u>NRC, 2005 Sulfate;</u>

 2,500 mg/L safe for cattle based on fewer studies, S, all feedlot.
 important, substantial toxicity differences between sulfate and other S forms!
 MRC gives example: 834 mg/L S = 2,500 mg/L SO₄.

 <u>USEPA 1976</u> up to 7,000 mg/L sodium.
 <u>Canada WGL</u> up to 3,000 mg/L sulfate.
 <u>30 years of field experience;</u>

 30 years of anecdotal evidence that current limits are adequate.
 Ranchers' testimonies indicate water is safe and manageable.

Current WY criteria are safe for Wyoming livestock.



Why do the recommendations differ? ppm = mg/L or mg/kg

- Sulfate:
- Feed, water intake rates considered a relevant effect even if growth not affected
- Differences between feedlot and open range not considered.
- Some studies evaluated other S forms, not sulfate Important, substantial toxicity differences
 - between sulfate and other S forms!

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Why do the recommendations differ? ppm = mg/L or mg/kg

- Sodium: ۲ Study reviews do not recognize total sodium intake (feed, etc)
- Ultimate recommendation appears to be based on milk production in dairy cows, specifically a study by Jaster et al. (1978): Dairy cows given 1,000 mg/L sodium in water, milk production
 - measured
 - Marginal declines (0.05<p<0.08) observed
 - Study subtly notes:
 - Cows additionally consumed 30,000 mg NaCl supplement per dav
 - Feed contained 12,800 mg/kg sodium in the food
 - Forage for WY open range estimated at ~800 mg/kg
 - Total sodium exposure = 14,000 ppm sodium per day
- Remaining studies cited by Raisbeck et al. (2007) do not show toxicity below 6,000 ppm sodium SRC

Are the Raisbeck et al. recommendations appropriate to set new limits?

- The study "Is a reasonable starting point"; however,
- It is not exhaustive
 - Key studies appear to be missing from Raisbeck et al for sulfate; additional studies found for sodium
- Does not consider variables applicable to WY
 - The study does not account for conditions under which livestock are raised in WY
 - adaptability, feed sources and quality, frequency of water use
- It is not risk-based
 - * The study does not consider WY statutory balancing criteria:

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Are the Raisbeck et al. recommendations appropriate to set new limits?

- Probability of risk must be put into context of relevancy to Wyoming's citizens and their livestock industry as mandated by the state (W.S. 35-11-302):
 (A) the character and degree of injury to or interference with the health and well-being of people, animals, wildlife, aquatic life and plant life affected;
 - No incremental reduction in risk
 - (B) the social and economic value of the source of pollution;
 - The water is beneficial to livestock, wildlife, agriculture and industry
 - (C) the priority of location in the area involved; Produced water tends to be discharged in areas where little natural water is available.

 - Water is avalable.
 (D) the technical practicability and economic reasonableness of reducing or eliminating the source of pollution; and
 The 1000 mg/L recommendation would eliminate sources of water relied upon by agriculture producers.
 - (E) the effect upon the environment.
 - Water of adequate quality is better than no water.

Conclusions

- Current limits protect against a measurable decrease in livestock production.
- Changing the criteria to levels recommended by Raisbeck et al. will not result in any incremental risk reduction to livestock.
- Should water quality limits be tightened, there will be a reduction in water availability on the open range and corresponding decrease in livestock production.

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Thank you.