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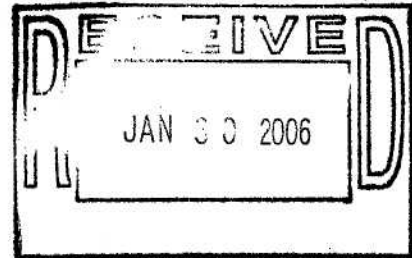
INDEPENDENT REGULATORY
REVIEW COMMISSION

Allen's Custom Hauling

C. Allen Ishler, Owner
435 Sinking Creek Rd.
Spring Mills, Pa. 16875
Phone: 814-280-2180

January 22, 2006

Department Of Agriculture
Bureau of Plant Industry
2301 North Cameron St.
Harrisburg, Pa. 17110-9408



Dear Friend,

I'm writing about the proposed manure hauler regulations that soon will be enacted. Some of the concerns I have deal with employees of the haulers.

Manure hauling is seasonal work with most employees being part-time and by requiring employees and/or owners to pay the biannual fee of \$185.00, is not going to be cost effective to the owners with the turnover rate of part-time help. If it was similar to the required pesticide license, I could direct my employee how and when to apply the manure. I could train him/her how to apply manure with a work book type training manual and I would be responsible for their actions.

The Level 3 Manure Hauler and Level 1 Manure Broker should be combined into one category. They are basically the same job, only one applies and the other directs the application. The fees should stay the same for that category.

Level 1 Manure Hauler should be simplified so that if manure is occasionally hauled by others not in the manure hauling business, they could sign documents supplied by the broker stating that they understand about dumping the manure in approved locations. A good example would be poultry manure that is sometimes backhauled to areas that could use the manure.

Keeping good records are important, but I think each manure hauler should keep his own records on hand rather than turning them to an office somewhere. If there was a problem with an application of manure, we would be responsible for showing the records for that particular incident.

Sincerely,

C. Allen Ishler
Signature