

Original: 2513

Gelnett, Wanda B.

From: IRRC
Sent: Thursday, February 16, 2006 7:37 AM
To: Gelnett, Wanda B.
Subject: FW: Commerical Manure Broker & Hauler Program Comments

Cris

-----Original Message-----

From: Nancy Kauffman [mailto:nancyk1965@pa.net]
Sent: Wednesday, February 15, 2006 11:49 AM
To: IRRC; dbb@psu.edu; kbenning@pahousegop.com; jcorman@pasen.gov; ag-scc@state.pa.us
Subject: Commerical Manure Broker & Hauler Program Comments

The attached letter is being mailed to Johan Berger of the Pennsylvania Dept. of Agriculture to express my opposition to proposed regulations related to commercial manure hauler and brokers, which were published in the December 17, 2005 issue of the PA Bulletin.

PA CODE CH. 130e / 35 Pa.B. 6751.

Your attention to this matter will be appreciated!

Paul A. Kauffman, Jr.
AK Transport LLC

February 15, 2006

Johan Berger
Pennsylvania Department of Agriculture
Commercial Manure Broker & Hauler Program
2301 North Cameron Street
Harrisburg, PA 17110-9408

Dear Mr. Berger:

I am the owner of a trucking business that hauls manure to large mushroom farms and small farms throughout the state of Pennsylvania. I am writing this letter to express my opposition to proposed regulations related to commercial manure hauler and brokers, which were published in the December 17, 2005 issue of the Pennsylvania Bulletin. I would request that the Department withdraw these regulations as proposed.

I attended one of the mandatory classes to become a certified manure broker in Lancaster on February 8th. I felt that most of the day was a waste of my time. I DO NOT spread manure on any of the farmers' land. My drivers simply unload the material where the farmer wants it and leave. All the spreading is done by the farmers themselves. My father and I have been buying and selling poultry manure to farmers for 40 years and to suddenly mandate that we need a certificate to continue is absolutely ridiculous! I was also shocked to find out that I will have to come up with a nutrient management sheet for each farm where we make deliveries. Wouldn't it make more sense that whoever is going to be spreading the manure (the farmer) be responsible for the nutrient management sheet? The proposed requirement for certification of each employee of my business is also disturbing. The turn-over rate in the trucking industry is high and the thought of having to certify each driver will end up being costly to say the least.

The burdens that the proposed regulations will impose on my business will more than likely lead to my not being able to haul manure to the small farmers. If I do continue, the added costs will have to be passed on to the farmers – I don't make enough money on these loads to cover these added expenses! So, as you can see, the real losers will be the Pennsylvania farmers who rely on these services to manage their operations. I can't imagine that this was the intent of these new regulations, but this WILL BE the reality.

In closing, I feel that you should take a good, hard look at this proposal. While I have no problem with keeping track of how much manure I haul to each farm, the added regulations and costs to my company will no doubt force me out of the manure hauling business. To pass a regulation that would require a trucking company to know how much manure should be applied to which farmers' fields is absurd.

Your attention to this matter will be appreciated.

Paul A. Kauffman, Jr.
PAK Transport LLC
42 Maple St.
Belleville, PA 17004
717-935-2558 or 717-667-6317