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INDEPENDENT REGULATORY
REVIEW COMMISSION

Mr. Berger

Thank you for the opportunity to comment on the proposed odor management certification program regulations. The regulations seem to be workable because the proposed odor management certification process is similar to the successful nutrient management certification program.

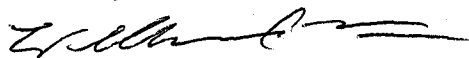
Comments on the proposed odor management certification program regulations:

§ 130f.3. Fees. The Odor Management Regulations only apply to New and Expanding Concentrated Animal Operation (CAOs) and Concentrated Animal Feeding Operation (CAFOs) and Voluntary agricultural operation. This is a relatively small pool of operations requiring the services of an Ode Management Specialist thus not provide much financial opportunity for the Commercial Odor Management Specialist. The current pool Nutrient Management Specialists have the most experience working with CAO and CAFO and will likely be the future Ode Management Specialist (OMS). In order to make becoming an OMS more attractive to NMS it is suggested that fourth level of certification fees be added. It is suggested that a \$100 fee for NMS that complete the OMS certification process. All the certification requirements would remain the same just a lower fee would be charged to NMS who are already in the Departments administrative system. The lower certification fee may make it more finically attractive for NMS to become OMS.

§ 130f.11. Determination of competence. The regulations require that for final certification, a commercial odor management specialist is required to development two approved odor management plans. Due to the number of operations that will be required to develop Ode Management Plans (OMPs) it is suggested the Department consider dropping this requirement to One. Another alternative could be that the Department provides certification training program with simulated operations. The commercial odor management specialist would then develop an OMPs for these simulated operations, the simulated OMPs could then be reviewed and if developed correctly would count toward final certification.

Once again, thank you for the opportunity to comment on these regulations.

Sincerely



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