

Pa. State Grange Prepares To Tackle Issues

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In addition to member suggested policies and issues, the committees can also work on issues that come to light in the interim.

Further, the state Master can task the committees to address issues of concern.

The Pennsylvania State Grange has 420 local organizations, and is represented in 66 of the state's 67 counties (not Philadelphia).

State policy then directs the Grange's state lobbying efforts. Because the policy is developed this way, state policy is local policy, and local issues become state issues.

Jesse Wood, chairman of the State Grange Agriculture and Environmental Issues Committee, said that at this time the committee had no resolutions to present, but would recommend some policy statements and might have some resolutions for consideration in time for the convention.

Wood said there are two main issues of concern before the committee: a proposal by the U.S. Environmental Protection Agency for states to adopt regulations controlling the operations and nutrient management of "concentrated animal feeding operations" (CAFOs); and a potential policy role with regards to focus and operations of the state Animal Health Commission.

As far as the EPA's CAFO proposals, Pennsylvania's Department of Environmental Protection has issued a proposal for changing and adapting the state's Nutrient Management Act regulations and its permitting program under the federal National Pollution Discharge Elimination System (NPDES) in order to fulfill the intent of the EPA's CAFO regulations.

According to Woods, "We do not specifically have policy on large (livestock) operations, but we have stated that the Grange

does not separate small farms from large farms. All farming activities should be within the scope of the laws and regulations governing their operations."

According to Wood, Included in the EPA CAFO proposal is that CAFOs with 301 to 1,000 animal equivalent units (roughly, one animal unit equals the weight of an adult cow) and a potential to discharge to surface water must have a nutrient management plan with a contingency plan for emergencies.

Those operations are to be be registered with DEP and must have an erosion and sedimentation control plan for earth disturbances and for acreage where manure will be applied.

For earth disturbances greater than 5 acres, an NPDES permit for storm water discharges will be needed, Wood said. "When this is completed, a general permit will be issued."

Of potential concern is the fact

that the permitting process allows for a public comment period.

For those operations with more than 1,000 animal units, the proposal is that they will need a special CAFO NPDES permit. Included is to be a nutrient management plan, an erosion and sedimentation control plan for earth disturbances and acreages where manure would be applied, another NPDES permit for storm water discharges for earth disturbances of greater than 5 acres, a water quality management Part II permit for having a manure storage facility, a preparedness and prevent contingency plan, and public participation.

"The Grange will look at developing policy (about the EPA CAFO rules adoption in Pennsylvania) using this type of approach (through the compliance proposal from DEP to EPA) versus a legislative or regulatory proposal.

"Obviously, this proposed document will have significant

impact on a number of farmers," Wood said. "The question is whether or not DEP should be able to impose this type of strategy through policy decisions or should it undergo the scrutiny of a more formal process through the General Assembly.

"Another concern we have to address is whether or not all of the CAFOs should become part of a public participation process," he said. "Should farmers be required to have public access to their plans and have the public become part of the permit process?"

As far as the Animal Health Commission, Wood said the Grange already has policy supporting the efforts of the Animal Health Commission.

However, he added, "The Commission is undergoing a process to look at its strengths and weaknesses and ultimately determine how to better serve the agricultural community.

"We must be a part of the process to make sure the new laboratory system is functioning and serving our producers, veterinarians and consumers."

John Courtney, chairman of the Environmental and Conservation Sub-Committee, addressed the DEP citizens volunteer monitoring program.

The citizens volunteer monitoring program has been ongoing for years, as the state has not been able to afford staff to continuously gather data about its many streams across the state. Such data includes temperature and flow, but can also include turbidity, oxygen levels or other parameters as equipment and volunteer expertise allows.

Twenty years ago, the best the state could do on its own was monitor stream conditions one day every 10 years.

Since data collected at that rate is useless, the raw field data collected through volunteers is seen as a benefit in helping to monitor possible changes in stream quality.

However, the program has become controversial with the state DEP proposal to formalize it.

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