## State, Industry Environmental Programs

(continued from Page A22) oncern, especially the way the proposed Unified Strategy would determine which farms are to be considered for mandatory comprehensive nutrient management planning approved by the federal government.

"There may be some merit to using animal numbers as (a determining threshhold for consideration for mandatory planning) as CAFOs are calculated, rather than using the density as we do in Pennsylvania (average annualized animal weights per acre suitable to receive manure nutrients)," he offered.

"But it appears that using an oversimplified, inaccurate, unrepresentative, inflexible method of determining animal units is a step backwards from the system used here in Pennsylvania, called the Animal Equivalent Units (AEUS)," Robinson said. "(Pennsylvania's) system has been recognized by EPA as being much more accurate than their method," he said. "The excuse (for using the federal method) that it's the same all over the country gives little comfort when the plans are to consider revisions in a few years, adding more confusion.

"Why not start right the first time?"

Robinson also questioned the wisdom of using water quality monitoring data in a watershed as an indicator of whether all farms in that watershed Lould be considered a CAFO and be required to have permitting and additional restrictions.

He further questioned the use of fertilizer sales in the county as a source of data for farm-fertilizer use.

For watershed monitoring data indicating high nutrient flows, he explained that sources of nutrients are not known just by testing water levels, and that just because the drainage of a watershed indicates nutrient pollution, there are many other potential sources that should be considered, not just farms.

He said the federal proposal also seems to put small farms at higher risk of failure because of extra, unecessary costs. The result could easily be to encourage the development of large, concentrated animal operations.

Another speaker was Douglas Goodlander, on behalf of Pennsylvania's State Conservation Commission (SCC), which currently oversees Pennsylvania's nutrient management laws and enforcement with help from both the state Department of Environmental Protection and the state Department of Agriculture.

He said the SCC is still reviewing the proposal and will provide formal written comments before

## the Jan. 19 deadline.

"Our general comments include that the commission is pleased with the general direction of the AFO strategy initiative, in that it specifically focuses regulatory activities on operations thought to have a high pollution potential.

"It relies on a voluntary incentives-based approach to encourage the remainder of farmers to implement nutrient management plans," he said.

-"This is similar to Pennsylvania's nutrient management program ...," he said.

He also said that the philosophies of the programs are somewhat similar, although:

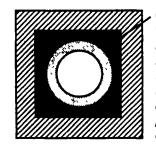
• Pennsylvania's mandatory planning requirements differ markedly from the federal proposal in that the federal government wants to include animal feeding as part of the overall plan, and Pennsylvania's planning doesn't go so far as to restrict a farmer to feeding according to an inflexible plan; •Pennsylvania has been a leader in working toward developing better feeding programs to reduce manure escapes of nutrients (they cost money and if they aren't used by the animal they cost more money and detract from profits.)

Also, he said that the SCC doesn't believe that the Unified Strategy's reliance of existing programs that provide cost-sharing funds for farms to implement environmental management practices and devices is wellconsidered.

(The Strategy more or less broadly suggests that funds from existing federal programs could be diverted and earmarked for the national nutrient management strategy.)

"We do not believe that (USDA's) EQIP (Environmental Quality Incentive Program) and other federal funding programs at their current funding levels will provide adequate resources to (Turn to Page A35)

## ... For New Construction Why Not Examine The "Chimtek Difference."



Chimtek Inner Liners are madeof volcanic pumice and hightempertature refractory cements, Its round shape provides even temperature inside flue and contributes to efficient flow of smoke and flue gasses The volcanic pumice in Chimteck liners adds considerable insulating value.

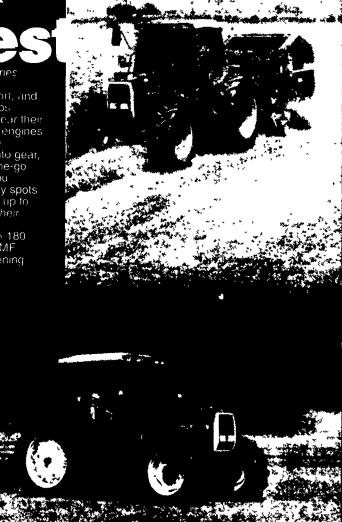
All three chimneyliner systems disbritubed by DS Machine Shop are of super design, super performance, and super value. With all their advantages these chimney systems often cost no more than ordinary chimneys. Write or call us for more specific liner information.

> D.S. Machine Shop Stoves & Chimneys 238B Old Leacock Road, Gordonville, PA 17529 717-768-3853

SCHICK ENTERPRISES Quality Turn Key Hog Buildings \* Competitive Pricing \* Full Service \* Personalized Attention

## See, Feel, and Work your Bes

Step into the MF\_6100 and MF 8100 Cories tractors and experience the unprecedented room, comfort, and visibility of Quite View<sup>TM</sup> cabs Turn the key and barely hear their smooth, quiet DynaTorque engines instantly puri to life. Slip the DynaShift<sup>TM</sup> transmission into gear, and feel the 4 smooth, on-the-go powershift speeds to pull you through both tough and easy spots At the end of the day, pull up to the fuel pump and witness their incredible fuel efficiency Sound like your kind of 86-180 hp\* tractor? Then see your MF Dealer today for an eye-opening test drive



Lancaster Farming, Saturday, December 12, 1998-A33



DETAI