

Odor Management Program Guidance and Technical Manual Version 4.0 Open Comment Period Summary of Comments Received

A Meeting to discuss comments received during the Program Guidance and Technical Manual Open Comment Period was held on December 14, 2020.

Meeting Attendees:

Frank Schneider
Karl Dymond
Brady Seeley

Listed below are comments received during the Program Guidance and Technical Manual open comment period. Recommendations were made to incorporate or dismiss the comment. The decision to dismiss or assign a “No Merit” status was made because either there is sufficient guidance in the Program Guidance and Tech Manual or the request exceeds the regulatory requirements. There were a total of 13 comments received during the open comment period. Of the 13 comments received, 11 comments were determined to have merit and will be addressed in Version 4.0 of the Program Guidance and Technical Manual. The results are listed below and will be presented to the Nutrient Management Advisory Board April 15, 2021

Comment 1 – Chapter 1 Typo and addition of definition	
Comment	<p>Correction needed in Chapter 1, page 1-4 under Animal Housing Facilities, line C. <i>Rooved Heavy Use Area Protection –</i></p> <p style="padding-left: 40px;"><i>i. If a Heavy Use Area Protection (NRCS Code 561) with Roof Runoff Structure (NRCS Code 558) has been modified to allow for animal occupation, e.g. by adding sides, walls, stalls, curtains, etc.), it has become animal housing.</i></p> <p>Correction needed: <i>Roofed Heavy Use Area Protection –</i></p> <p style="padding-left: 40px;"><i>i. If a Heavy Use Area Protection (NRCS Code 561) with Roofs and Covers (NRCS Code 367) has been modified to allow for animal occupation, e.g. by adding sides, walls, stalls, curtains, etc.), it has become animal housing.</i></p>
Manual Sections Impacted	Chapter 1
Issue Workgroup Leader	Dymond
Issue Workgroup	Dymond
Bulletin Article Author	NA
Open Comment Period Discussion Meeting 12/14/20	This comment has Merit and will be addressed

Comment 2 – Equine Operations	
Comment	Horse farms should be treated differently than swine, poultry, and bovine operations.
Manual Sections Impacted	All

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Issue Workgroup Leader	Dymond	Issue Workgroup	Dymond
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12-14-20	No Merit, Equine get a 50% cut in OSI scores currently		

Comment 3 – Program in General			
Comment	<p>Its time to go public with the short comings of the Odor Management Program! I feel, like many, that we have all of these demands on our plates and some govt official asking for us to use a particular font or particular formatting that accidently changes because your requiring us to use a 30-year word product is ludicrous. I will be frank with you; this program is so flawed. I beg you to put together a work group to FIX this cluster of plan layout! Every time I do a plan for YOUR program, I have to laugh out loud. Because the items and formatting you speak of is a joke. I should not have to worry about formatting changes in a document that literally sucks. If these formats are changing, by no fault of my own, it's because of the original platform is flawed. I still laugh that I have to leave in your red highlight notes. It's the most unprofessional document next to the NMP ACT 38 template that we are required to use. If anyone outside of the program, would see this document in final form, they would laugh with me. I think the Commission and PDA should reevaluate how lousy this current template is.</p>		
Manual Sections Impacted	OMP Template		
Issue Workgroup Leader	Dymond	Issue Workgroup	Dymond
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12-14-20	No Merit		

Comment 4 – NMP Transfer – Notification by CD	
Comment	<p>Odor Management Plans (OMPs) are required when new animal housing facilities and/or new manure storage facilities are created for agricultural operation that are Concentrated Animal Operation (CAO) or Concentrated Animal Feeding Operation (CAFO).</p> <p>When an operation sells or transfers the farm, the new operators frequently transfer the NMP but often are not aware of the Odor Management planning requirements and may not notify the OM Program of the need to transfer the OMP.</p> <p><u>Conservation District staff are requested to notify their SCC regional coordinator or OM Program staff when an NMP is Transferred to a new operator so the SCC</u></p>

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	<u>can determine if there is an OMP for this farm site, and then notify the new operators if they have OM Planning requirements.</u>		
Manual Sections Impacted	Chapter 10		
Issue Workgroup Leader	Dymond	Issue Workgroup	Dymond
Bulletin Article Author	Dymond		
Open Comment Period Discussion Meeting 12-14-20	Merit		

	Comment 5 – Contact Update		
Comment	<p>Please be advised that the mailing address and phone number for Karl Dymond, Odor Management Program Coordinator, has change effective immediately. All mail to the Odor Management Program should be sent to:</p> <p style="text-align: center;">State Conservation Commission Odor Management Program 2301 N. Cameron Street Harrisburg, Pa 17110-9408</p> <p>All phone calls to the Odor Management Program should be directed to 1-215-287-4564 Karl Dymond’ s e-mail address will remain the same; kdymond@pa.gov</p> <p>Also, add the program resource account e-mail address</p>		
Manual Sections Impacted	Supplement 9		
Issue Workgroup Leader	Dymond	Issue Workgroup	Dymond
Bulletin Article Author	Dymond		
Open Comment Period Discussion Meeting 12-14-20	Merit		

	Comment 6 – Run in Sheds		
Comment	Run in sheds that only provide shelter from weather, no feed or water provided, should not be considered animal housing.		
Manual Sections Impacted	Chapter 1		
Issue Workgroup Leader	Dymond	Issue Workgroup	Dymond
Bulletin Article Author	Dymond		

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Open Comment Period Discussion Meeting 12-14-20	Merit
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Comment 7 – Transferred AEUS			
Comment	Non-Allowance of Transferred AEUs for Equine and Cattle Operations due to typical population of the regulated barns over time (vs. immediate maximum population of other species) and due to typical backfilling of animals into non-regulated barns. Clarification on allowed Transferred AEUs is also needed.		
Manual Sections Impacted	Chapter 3		
Issue Workgroup Leader	Dymond	Issue Workgroup	Dymond
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 12-14-20	Merit		

Comment 8 – Site Name			
Comment	Need to use Site Names with the Plan Name to more properly distinguish the site from other sites of the operator or other operators with the same or similar names.		
Manual Sections Impacted	Chapter 2		
Issue Workgroup Leader	Dymond	Issue Workgroup	Dymond
Bulletin Article Author	Dymond		
Open Comment Period Discussion Meeting 12-14-20	Merit		

Comment 9 – Supplemental Odor BMPs			
Comment	Correct the error with Documentation of Supplemental Odor BMPs		
Manual Sections Impacted	Chapter 2, 8 & 10		
Issue Workgroup Leader	Dymond	Issue Workgroup	Dymond
Bulletin Article Author	Dymond		
Open Comment Period Discussion Meeting 12-14-20	Merit		

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Comment 10 – Property Line Boundaries			
Comment	Clarification needed on property line boundaries (land parcel vs Operational control)		
Manual Sections Impacted	Chapter 4		
Issue Workgroup Leader	Dymond	Issue Workgroup	Dymond
Bulletin Article Author	Dymond		
Open Comment Period Discussion Meeting 12-14-20	Merit		

Comment 11 – Roofed Heavy Use Area Protection			
Comment	Clarification if one is stacking manure in a roofed heavy use area protection (barnyard), if an OMP would be needed.		
Manual Sections Impacted	Chapter 1		
Issue Workgroup Leader	Dymond	Issue Workgroup	Dymond
Bulletin Article Author	Dymond		
Open Comment Period Discussion Meeting 12-14-20	Merit		

Comment 12 – Plan Transfers			
Comment	Clarification of if a plan amendment or plan update is needed for a plan transfer		
Manual Sections Impacted	Chapter 10		
Issue Workgroup Leader	Dymond	Issue Workgroup	Dymond
Bulletin Article Author	Dymond		
Open Comment Period Discussion Meeting 12-14-20	Merit		

Comment 13 – Plan Updates / New Plan Writer	
Comment	Clarification on what is required when a new planner updates an existing OMP
Manual Sections Impacted	Chapter 10

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Bulletin Article Author	Dymond		
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