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December 27, 2007

Barry Wallerstein, D.Env.
Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: MAJOR MANURE MANAGEMENT CONCERN IN SOUTH COAST

Dear Mr. Wallerstein,

Milk Producers Council is a trade association representing many of the dairy farms in the South Coast air basin (SCAB). On behalf of these dairy families, I am writing you to urge your involvement in a specific and serious manure management issue in the Chino/Ontario region.

I recently found out that a company operating a manure composting facility – Earthwise Organics – is closing their operation in Ontario, CA. While this facility is shutting down for a couple of different reasons, I understand that one of the major concerns they had was their ability to continue operating under the regulations outlined by AQMD (Rules 1127 and 1133). This greatly concerns the dairy producers in the area.

This composting operation – which is located at 7210 Chino Avenue in Ontario – was permitted to compost up to 99,000 tons per year of dairy manure. Mature dairy cows produce about 4 dry tons of manure per year, meaning that this facility was able to process the manure of almost 25,000 cows in the region. Recent estimates indicate that there are less than 100,000 mature cows left in this area, which means that this facility could accommodate about a quarter of the manure produced by these cows.

As you know, manure management is an increasing difficult issue to address. In accordance with regulations set by the Santa Ana Regional Water Quality Control Board, dairies are limited in where they can apply their manure to land and how much they can apply. Dairies are being forced to haul their manure further and further away from their farms, putting more and more diesel-powered trucks on the highways.

Several alternatives to land application have emerged in recent years. The Inland Empire Utilities Agency has three anaerobic digesters that currently operate in Chino and several local dairies are utilizing that option. But these digesters are limited in their capacity, and even with a recent major expansion, they can only process a third of what Earthwise Organics was permitted to compost.

With composting options severely limited in the area, dairies are left with no options but to haul the manure further away each year and apply the manure to farm land.

By AQMD's own calculations, composting dairy manure provides a much higher level of "emission control effectiveness" than applying the manure to land. In the "annual emissions report" that dairies file each year with AQMD, open-windrow composting has an "emission control effectiveness" of 38.5 percent, while land application has an effectiveness of only 11.5 percent. So when a composting facility that can process the manure of 25,000 cows is unable to operate in the SCAB, the net emissions in the basin actually increase.

Volatile Organic Compound Emissions (AQMD figures)

	Base VOC emission (12.8 lbs/head/yr)	Net emission with open windrow composting**	Net emission with land application***	Increase
25,000 cows*	320,000 lbs/year	196,800 lbs/year	283,200 lbs/year	86,400 lbs/year
	or 160 tons/year	or 98.4 tons/year	or 141.6 tons/year	or 43.2 tons/year

* *The approximate processing capacity of the recently-closed composting facility*

** *AQMD estimates that open windrow composting has a "control efficiency" of 38.5 percent*

*** *AQMD estimates that land application of manure has a "control efficiency" of 11.5 percent*

In this chart, you can see that by removing one of the local composting options and replacing it with land application, the net emissions of VOCs (as well as ammonia) from that manure increase by almost 44 percent! And that does not even account for the added emissions from the diesel-powered trucks that have to haul the manure farther away each year!

This is not an attempt on the part of the dairy community to avoid appropriate regulation or find some loophole. Our dairy families truly want to work with AQMD to find a rational policy that allows for efficient handling of dairy manure. The local dairy community has changed significantly since AQMD last addressed its policy towards composting. With the urbanization we have seen in recent years, dairies have been exiting the SCAB, and this trend is expected to continue. On behalf of the dairies families that remain in the area, it is our hope that we can work with AQMD to find a reasonable approach to efficiently managing the dairy manure.

I would appreciate the opportunity to discuss this issue with you further. To set up a meeting or to discuss this further, I can be reached via cell phone at (909) 992-9529. I look forward to working with you on this very important matter.

Sincerely,



Robert VandenHeuvel
Manager

cc: Mayor Dennis Yates, AQMD Governing Board
Supervisor Gary Ovitt, AQMD Governing Board
Charles Tupac, AQACS, AQMD
Tracy Goss, Program Supervisor, AQMD