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TO: Ms. Christie Nuttall

FROM: Tina Galloway

DATE: January 18, 2013

RE: Comments—Conversion Technology Rulemaking

PAGES (incl. Cover): 3

Thank you!
Tina



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January 18, 2013

Christie Nuttall
Oregon Department of Environmental Quality
Land Quality Division
811 SW 6th Ave.
Portland, OR 97204

Dear Ms. Nuttall,

I am writing to provide input for consideration during the Conversion Technology Rulemaking process. We hope that the perspective and experience of Stahlbush Island Farms may add value to the discussion and process.

Stahlbush Island Farms is a family-owned and operated farm in the Willamette Valley, just outside of Corvallis, Oregon. Our business includes an on-farm processing plant and on-farm biogas plant. We are a sustainable and organic farm, constantly striving to care for our environment and the community as we produce high-quality, safe food.

As we continue to push our commitment to sustainability, in 2009 we began operation of our on-farm biogas plant. This facility creates methane gas through the anaerobic digestion of feedstock; the methane is then converted into electricity. Our feedstock includes fruit and vegetable material generated from our on-farm processing facility, field by-products from our farming operations, silage created from our sweet corn processing, etc. The electricity we can generate is enough to cover our own needs, plus that of many other power users. We are creating clean, green energy to help support our local environment and economy.

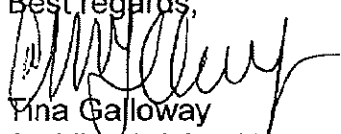
Our anaerobic digestion process also creates organic fertility products that we use to feed our crops. These materials are applied to our fields to provide key nutrients required for healthy crops. The materials have received the approval of Oregon Tilth, working within the USDA National Organic Program standards, for the application to our certified organic fields. We also use the digestate on our non-organic fields to further reduce dependence on commercial fertilizers. Because of our ability to take full advantage of this benefit, we do not believe that the on-farm use of on-farm generated fertility products should have the same regulatory requirements as those without such a connection.

Our farmland is dedicated primarily to the production of food; therefore, we are not "wasting" valuable farmland on the production of energy crops. Rather, we are making dual benefit for the community from these acres, providing wholesome food and green energy.

At Stahlbush Island Farms, we don't believe in "waste". Items that others may consider to be waste, we see as under-utilized resources. Our processing business began by creating a value for pumpkin flesh that would have otherwise been left in the fields. This "no-waste" approach has continued throughout our history, with the construction of the bio-gas plant as the greatest example. It is our belief that such proactive efforts to live out the sustainability practices discussed regularly in Oregon should be celebrated and encouraged, rather than hampered by regulations more appropriate to waste-generating businesses.

We respectfully submit these thoughts for your consideration as you undergo the final rulemaking process for Conversion Technologies. We appreciate the challenge you are facing, and hope that our perspective will add value. Please feel free to contact us directly if there is any other way we can help.

Best regards,



Tina Galloway

Stahlbush Island Farms, Inc.