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January 15, 2019

Richard Whitman, Director
Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232-4100

Sent via E-Mail: Whitman.Richard@deq.state.or.us

RE: Methane Digester Pathogen Reduction Rule

Dear Director Whitman:

The ODFA has proudly served the Oregon dairy industry since 1892. Since inception, the industry has evolved, due in part to technology, advocacy and scientific research. We believe there is tremendous opportunity in the evolution of technology and innovation, especially in manure management. We see potential to increase the usage and marketability of manure and manure-based products; utilize manure to develop a cost-effective, low-carbon alternative to diesel fuel; and recycle essential nutrients. Digesters and related technologies are central to progress in these areas.

By embracing continuous improvement in farming practices and manure management, farm risks are minimized, rural resilience is supported, positive relationships with natural resource industries are developed, and pathways to more cost-effective energy are created. ODFA supports development of manure digesters in a variety of locations and sizes across the state. We understand your agency is considering the pathogen reduction rules which govern on farm and off farm digesters. The ODFA supports the amendment to the existing rules to create consistency.

As you are aware, there is a community digester at the Port of Tillamook Bay which is sitting idle. This digester could be providing environmental benefits and a delivery point for the manure from local dairy farms for processing.

Thank you for ensuring the impediments currently causing delay to the startup of this digester are addressed in as efficient and expeditious manner as possible. The ODFA appreciates your willingness to engage and create solutions that are beneficial to a broad array of stakeholders to achieve positive environmental outcomes.

Respectfully,

A handwritten signature in blue ink, appearing to read "Chad V. Allen", is written over a light blue circular stamp.

Chad Allen, President
OREGON DAIRY FARMERS ASSOCIATION