

**From:** [David Haggith](#)  
**To:** [Jennings, Jonathan \(ECY\)](#)  
**Subject:** FW: Draft CAFO permit  
**Date:** Wednesday, October 07, 2015 11:20:18 AM  
**Attachments:** [Comments Draft CAFO 2015.doc](#)

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Jon,

I realize that this is a bit after the extended comment deadline, but here is a short and precise technical comment form one of the leading Ag Soils labs in the state about the soil and manure testing requirements. They have a level of involvement in the EPA work in Yakima and can pull from that to help ensure we are all testing the same things since there are so many different test methods out there.

Sorry that this is a late one, but I was unaware that they hadn't been in the loop from the start.

Regards

David

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**From:** Brent Thyssen [mailto:[brent@soiltestlab.com](mailto:brent@soiltestlab.com)]  
**Sent:** Tuesday, October 6, 2015 3:19 PM  
**To:** 'David Haggith' <[dhaggithn3@frontier.com](mailto:dhaggithn3@frontier.com)>  
**Subject:** RE: Draft CAFO permit

David,

Please forward the attached letter to the appropriate person.

Brent

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**From:** David Haggith [<mailto:dhaggithn3@frontier.com>]  
**Sent:** Monday, October 05, 2015 4:19 PM  
**To:** Brent Thyssen <[brent@soiltestlab.com](mailto:brent@soiltestlab.com)>  
**Subject:** RE: Draft CAFO permit

No worries. I'll be in tomorrow afternoon to drop off some samples.

Regards

Savid

David Haggith  
Sent from the Droid

----- Original message -----

**From:** Brent Thyssen <[brent@soiltestlab.com](mailto:brent@soiltestlab.com)>  
**Date:** 10/05/2015 4:04 PM (GMT-08:00)  
**To:** 'David Haggith' <[dhaggithn3@frontier.com](mailto:dhaggithn3@frontier.com)>

Subject: RE: Draft CAFO permit

David,

Just a note to let you know I have not forgotten you. I will try and get something back to you in the next couple days.

Brent

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**From:** David Haggith [<mailto:dhaggithn3@frontier.com>]

**Sent:** Thursday, October 01, 2015 3:33 PM

**To:** [brent@soiltestlab.com](mailto:brent@soiltestlab.com)

**Subject:** Draft CAFO permit

Brent,

Thanks for taking a look at this for me.

The pages of note are pages 24 and 25 where they reference the different soil and manure testing methods, they also reference a bunch of different methods for taking soil and manure samples which all seem a complication when everyone's farm plans already contain this info.

Thanks for your input

Regards

David

David Haggith

Certified Crop Advisor



**N3 Consulting**

**360-815-4851**



October 05, 2015

Comments on the Preliminary Draft 08-03-2015 CAFO General Permit

My comments are on the analytical methods for Manure and Soil analysis put forth in the proposed permit. In the permit EPA methods are proposed for both matrixes. These methods work well for waters and other non Ag related matrixes but I submit that there are more specific and appropriate methods that should be cited.

For *Section S5B Manure sampling and testing subsection 3 Manure Sample Analysis p24*

The methods referenced should be from the MAP program. The Manure Analysis Proficiency Program (MAP) (Administered by Jerry Floren. [jerry.floren@state.mn.us](mailto:jerry.floren@state.mn.us) from the Minnesota Department of Agriculture) certifies laboratories for the analysis of manures, both solid and liquid. The program has accepted and published methods. The methods manual can be found at <http://learningstore.uwex.edu/Assets/pdfs/A3769.pdf> Unit III Laboratory Procedures page 12.

For *Section 5.C Soil Sampling and Testing subsection 2 Soil Analysis p25*

The methods referenced here should be from the *Soil, Plant and Water Reference Methods for the Western Region, 2003, 2<sup>nd</sup> Edition, WCC-103 Publication*. The methods are accepted methods for the North American Proficiency Testing Program (NAPT) and the North American Proficiency Testing Performance Assessment Program (NAPT-PAP) Administered by Dr. Grant Cordon [NAPT@usu.edu](mailto:NAPT@usu.edu) through the Soil Science Society of America. The PAP program is required by the NRCS for soil analysis laboratories analyzing soils for federal government programs involved with the development of nutrient management plans in certain Western US states. <http://www.naptprogram.org/pap> .

There is precedence for the use of the above methods in the state of Washington. They are being used for the EPA monitored dairy management plans in the Yakima Valley.

I would be happy to correspond with anyone about the methods mentioned above. I can be contacted by email at [brent@soiltestlab.com](mailto:brent@soiltestlab.com) or the phone number below.

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