Comments received from the Agriculture Workgroup by 6/12/14 on the Recommendations for the Manure Treatment Technologies Expert Panel.

AgWG Comments:

- The thermochemical category may need to be broken into further categories to account for variation between types.
- Will the expert panel be breaking these technology categories into subcategories?
- Will the verification guidance be included in the expert panel considerations?
- Recommend that the atmospheric emissions component could be captured from other external sources by the panel vs. recreating information internally.
- Recommend capturing the variation across the geographic and temperature differences as well as other structural, permitting, and management issues.

State Comments:

- To Manure Technologies Subgroup - One consideration I feel should be a part of whatever technology is supported in any one area, farm, etc. is the availability of an outlet or market for the final product. Without a viable use of the material resulting from the technology, it is going to be limited in its lifespan. For the most part there are technologies that have been proven, but development of a market for the material produced in some cases maybe the limiting factor to its success. Part of the technology design may be to expand production as the markets for the product become established. One strategy may be to work with a company that can make use of the product, such as a composing company looking for a carbon source or energy source depending on the output of the technology. Logistics of converting manures to more closely be handled as a fertilizer material is a challenge because of the volume of material compared to its nutrient content. Very often you are dealing with tons of manure per acre vs pounds of fertilizer. These are not new issues, but perhaps this may be an opportunity to look at a more integrated approach when considering adopting these technologies.

NGO Comments:

- Excellent job in pulling together a lot of information together and presenting it a concise fashion.
- Although not critical I thought there were states had included more TTechnologies in WIPs…especially PA- at least in Phase 1 WIP.
- Good idea to draw a distinction between technologies that need to be adderessed by the Expert Panel and other ones where data and interim work is already underway. Should save some time unless some state folks balk.
- Re: expertise for panel members- great to see atmospheric emissions from MTs included - getting an expert panel perhaps from USDA or EPA may be the way to go?
- My immediate reaction to the components of the detailed report outline is…..seems abit to much. The overall purpose of the report was " to quantify the nutrient reduction benefits of these manure treatment technologies." States who have technologies in their WIPs may be concerned that to much of an effort will be placed in a comprehensive report rather than one

that strictly focuses on the primary purpose. With so much proposed content- the amount of time and resources need to be considered in comparison to the expressed primary purpose.

- When do you think the call for candidates for the expert panel will be announced?
- The statement,"there is some evidence that when manure is applied on a nitrogen basis digesting manure changes the total amount of nitrogen required because digestion changes the availability of the nitrogen, potentially reducing the amount of commercial nitrogen required for sidedressing." In reading this statement some folks will read into this as being a rather weak statement- can you provide a citation?
- Page 7 indicates that digesters are "widely" adopted in the (bay) region. Since digesters technology really do not control/reduce nutrients- I would guess that wide adoption is associated with odor control- can this be clarified. How many digesters have been successfully constructed in the Bay region?
- Why wouldn't biological removal of N – since it is technologically viable for treatment plants and where a fair amount of data is available carry a higher priority especially since this technology actually does remove N?