

Part II. Implementation Approach and Framework Dairy Air Quality Task Force Homework

Implementation	Advantages	Disadvantages
<p><i>I. Voluntary: Education, Outreach & Incentives</i></p>	<ul style="list-style-type: none"> • Industry will be on board (Bansen) • Anything voluntary will be presumably cheaper, easier, and be the least trouble for those who have to do the work (Baumann) • Low cost to the state – Dairy industry moving to implement programs already. (Hanson) • Doesn't necessarily cost taxpayer dollars. (Kendra) • At this time, there is not enough accurate data to implement mandatory standards. (Males) • Will get better buy in from industry if voluntary. (Males) • Less economic impact on small producer. (Males) • Limited cost, working with industry, using what works in other states. (Moore) • Preferred. (Myers) • Incentives industry. (Wustenberg) 	<ul style="list-style-type: none"> • EPA may grouse. (Bansen) • Environmental groups may not agree this is enough. (Bansen) • Anything voluntary will have a hard time being taken as a credible reliable problem if there's no official oversight. (Baumann) • Public concern and lack of buy in. (Hanson) • Voluntary. (Myers) • May not satisfy 3rd party concerns. (Wustenberg)
<p><i>A) Industry Run</i></p>	<ul style="list-style-type: none"> • Practical knowledge. (Bansen) • Could be industry run with ODA oversight. Could use an oversight committee made up of industry and non-industry people. Should be based on BMPs that would be evaluated on a regular basis, as new research/information is available. (Bansen) • Desire by industry to implement. (Ginsburg) • Could lead to higher acceptance by operators. (Ginsburg) • Ability to adopt systems that work on individual farm operations. (Hanson) • Potential for increased industry buy-in. (Kaye) • Better buy in. (Males) • Practical approach and interested in results. (Moore) • Practical knowledge. (Wustenberg) 	<ul style="list-style-type: none"> • No 3rd party will earn the least credit and credibility. (Baumann) • Lower acceptance by the public. (Ginsburg) • Could be difficult to measure. (Ginsburg) • Lack of Oversight and performance measures. (Hanson) • Not enough oversight. (Kaye) • There will not be as much confidence from public. (Males) • Not all practices have been evaluated as to impact, a bit unknown. (Moore) • Credibility issue. (Myers)

<p><i>B) 3rd Party Run</i></p>	<ul style="list-style-type: none"> • Provides Cross Check. (Bansen) • More credible than industry alone. (Baumann) • Provides higher credibility to the public. (Ginsburg) • Provides Cross Check. (Hanson) • Possible neutrality. (Kaye) • Provides an impartial verification. (Males) • Audit potential. (Myers) • Independent opinion. (Wustenberg) 	<ul style="list-style-type: none"> • Not enough state oversight. (Bansen) • Not as credible as state agencies, depending on who the third party is. (Baumann) • May be difficult to find and fund the appropriate 3rd party. (Ginsburg) • May not do enough to provide credibility to the public. (Ginsburg) • Perceived as not regulatory/lack of oversight and enforcement. (Hanson) • Costs. (Kaye) • Not sure who would do this. Would need auditing training? (Males) • Expensive and no real interest in getting the job done. (Moore) • Qualified vendors. (Myers) • Cost (Wustenberg)
<p><i>C) State Run</i></p>	<ul style="list-style-type: none"> • Oversight. (Bansen) • Infrastructure in place. (Kaye) • Could be done by CAFO inspector and gives third party verification. (Males) • CAFO inspectors already in place. (Myers) • 2nd party oversight. (Wustenberg) 	<ul style="list-style-type: none"> • Cost state funds. (Bansen) • If it's going to be state-run, it seems hard to argue that it shouldn't be at least formally adopted to maximize the credibility benefit. (Baumann) • Cost/Need to develop expertise within the agencies. (Hanson) • Process would have a tendency to become cumbersome. (Kaye) • Cost state funds need more inspectors. (Males) • Budget. (Myers)

<p>II. Regulatory: New Source Review</p>	<ul style="list-style-type: none"> • OK for new Dairies only. (Bansen) • Could be run by ODA CAFO through MOU if this option used. (Bansen) • Allows a public process to be carried out for the siting of new operations. (Kendra) • Provides regulatory certainty for individual operators. (Kendra) • Allows for state oversight. (Kendra) • Should wait until there are EPA guidelines after national study completed. (Males) • Interested in getting some impact. (Moore) 	<ul style="list-style-type: none"> • Potentially costly, rigid system. No research/info to show we need this kind of regulation. (Bansen) • Only applies to new dairies, which seems arbitrary. (Baumann) • Not sure, we have enough information to know where to set the trigger. (Males) • New facilities will already be designed with BMPs to meet CAFO requirements. (Males) • The movement forward will be slow. (Moore)
<p><i>A) Federal NSR</i></p>	<ul style="list-style-type: none"> • This is already required. (Ginsburg) • None. (Johnson) • Standards already exist. (Kaye) • Minimal impact to existing. (Wustenberg) 	<ul style="list-style-type: none"> • Few if any dairies will be big enough to trigger this. (Ginsburg) • Oregon Dairies generally are not large enough. (Hanson) • Two-Tiered System. (Johnson) • EPA is too slow and commonly weak in the standards department. (Kaye) • Doesn't necessarily allow for the regulation of problem-causing emissions. (Kendra) • Creates different tiers. (Wustenberg)
<p><i>B) State NSR</i></p>	<ul style="list-style-type: none"> • Best time to apply emission reductions is before a CAFO is built or before a major expansion occurs. (Ginsburg) • Could reduce costs to retrofit later. (Ginsburg) • Reduce public concern about growth of CAFOs. (Ginsburg) • None. (Johnson) • State specific protection would focus on particular issues in Oregon. (Kaye) • Would potentially allow the state to regulate emission - causing problems that are not covered by the CAA. (Kendra) 	<ul style="list-style-type: none"> • More stringent requirements for new or expanded dairies could discourage them from being built. (Ginsburg) • Doesn't address existing dairies where most of the emissions are. (Ginsburg) • More stringent than other states, can put Oregon at an economic development disadvantage. (Hanson) • Potential increase production cost. May discourage family operations. (Hanson) • Two-Tiered System. (Johnson) • The process could become cumbersome and take too long. (Kaye) • Could potentially create a hollow permit and not solve the problem. (Kendra)

<p>II. Regulatory: Emission Standards</p>	<ul style="list-style-type: none"> • Requires compliance. (Kendra) • State oversight. (Kendra) • Equitable distribution of burden. (Kendra) • Scientifically-developed limit on emissions to avoid harming public health and the environment. (Kendra) • All playing by the same level. (Moore) • Protection to industry. (Myers) 	<ul style="list-style-type: none"> • Difficulties of measuring. (Baumann) • Risk of unintended consequences on other environmental media. (Kendra) • I do not believe the knowledge base is adequate to do this yet. I believe monitoring and research should be completed before this is applicable. (Males) • Costly to measure and setting the level is a wild guess. (Moore) • Not yet available. (Myers)
<p>A) Design Standards</p>	<ul style="list-style-type: none"> • Better than performance, given difficulty of measuring. (Baumann) • Simpler to administer if one knows what to require. (Ginsburg) • Simpler to monitor. (Johnson) • A combination of design and performance would seem to be the best approach to reach the clean air goals. (Kaye) • Saves new operators from having to retrofit operations with emission-mitigating technologies later on. (Kendra) • Already being studied. (Myers) • Easy to administer. (Wustenberg) 	<ul style="list-style-type: none"> • It seems like different combinations of strategies can lead to the same outcome. (Baumann) • Impractical because there is no “one-size-fits-all” BMP, and there is too much diversity in operations to determine which BMP to require in each situation. (Ginsburg) • Doesn’t take into account management-initiated best practices. (Johnson) • Dairy operations - size, management, etc., differ from operator to operator. No one size fits all. (Hanson) • Difficult to ensure compliance. (Kendra) • Premature. (Myers) • May not represent true impacts. (Wustenberg)
<p>B) Performance Standards</p>	<ul style="list-style-type: none"> • More complicated to monitor. (Johnson) • Would ensure that a certain emission reduction is achieved if emissions could be measured. (Ginsburg) • Across the board compliance. (Kendra) • Already being studied. (Myers) • Harder to monitor. (Wustenberg) 	<ul style="list-style-type: none"> • Difficulties of measuring. (Baumann) • Impractical for dairies due to inability to measure emissions in real time. (Ginsburg) • How do you measure for compliance? (Hanson) • More responsive to actual emissions. (Johnson) • Difficult to ensure compliance. (Kendra) • Costly. (Kendra) • Premature. (Myers) • More meaningful. (Wustenberg)

<p>II. Regulatory: Menu of Structural & Management Practices</p>	<ul style="list-style-type: none"> • Agree with opting-in unless new or required due to problems. Could be run by ODA CAFO through MOU. (Bansen) • More flexible. (Baumann) • Good compromise between design standards and performance standards. (Ginsburg) • Gives producers something to target and shoot for both in design and management. (Males) • Nice to build on what Idaho has done. (Moore) • Still not a scientific system, but a place to start. (Myers) 	<ul style="list-style-type: none"> • Actual emission reductions will be uncertain since the BMPs vary and their effectiveness isn't well understood. (Ginsburg) • Based on old assumptions. (Myers)
<p>A) Opt-in</p>	<ul style="list-style-type: none"> • Could be a good way to start to gain buy-in from the industry. (Ginsburg) • Ability for producers to select workable options. (Hanson) • Allows flexibility for small operation and older operations. (Hanson) • More flexible for industry. (Johnson) • At this point, I don't believe our knowledge base is adequate for mandatory. (Males) • Reward proactive business. (Myers) • Voluntary. (Wustenberg) 	<ul style="list-style-type: none"> • Less credible. (Baumann) • Didn't Krahn say they want everyone in? (Baumann) • Participation should be based on environmental criteria, not willingness to be part of solution. (Baumann) • No assurance that any emission reductions will occur. (Ginsburg) • Not all facilities included. (Hanson) • Not as much accountability. (Johnson) • The risk of not opting-in is too great. (Kaye) • Total emission reductions can't be quantified. (Kendra) • Ineffective for site-specific cases. (Kendra) • Doesn't deal with individual bad actors. (Kendra) • Creates uncertain legal climate for individual operators. (Kendra) • Difficult to measure at each operation as management differs. (Moore)

<p><i>B) Mandatory</i></p>	<ul style="list-style-type: none"> • Most credible. Treats everyone the same, so most fair. (Baumann) • Ensures that the larger dairies and the ones with potentially greater impacts participate. (Ginsburg) • Can't catch all the bad actors. (Johnson) • Best option for optimal results. (Kaye) • 100% participation. (Kendra) • Emissions reductions could potentially be quantified. (Kendra) • Allows for state and public oversight. (Kendra) • Allows operators a choice for how their individual operations can reach the end goal. (Kendra) • Provides legal certainty. (Kendra) • Provides flexibility as new research and technologies are tested. (Kendra) • Fosters collaboration between stakeholders. (Kendra) • Should wait for Federal program and additional study. (Myers) 	<ul style="list-style-type: none"> • Presumably, more people who don't want to participate would object to this. (Baumann) • Could be administratively or financially burdensome for some dairies. (Ginsburg) • Legislature resists mandates. (Johnson) • Limits options at the farm level. Incomplete understanding and values of what system will produce. (Moore) • Not based on best science. (Myers) • Impose practices that may not apply. (Wustenberg)
<p>III. Legislative Funding</p>	<ul style="list-style-type: none"> • Allows for Oregon-specific emission monitoring. (Kendra) • Must have for monitoring to establish baselines. (Males) 	<ul style="list-style-type: none"> • It's going to be hard to get any extra funding for anything. (Baumann) • If don't have, we're shooting in the dark. (Males)
<p><i>A) Research</i></p>	<ul style="list-style-type: none"> • We need more research on what our situation is in Oregon before we make admin rules/laws that we end up wanting to change later as more info is available. Need research on which BMPs are beneficial, which aren't, and where they may conflict. (Bansen) • Could target research on items of interest in Oregon. (Ginsburg) • More industry info. (Johnson) • Need to know which BMPs are best for Oregon situations. (Males) • Provides best answer. (Moore) • Need more study. (Myers) • Yes. (Wustenberg) 	<ul style="list-style-type: none"> • Expensive, time consuming, and could duplicate national research. (Ginsburg) • Potential duplication. (Johnson) • Expensive and takes time. (Moore) • Funding. (Wustenberg)

<p><i>B) Funding</i></p>	<ul style="list-style-type: none"> • Monitoring would help determine if there is risk to neighbors. (Ginsburg) • Money is always good. (Johnson) • This should be deferred until there is a system in place – this question is very contextual. (Kendra) • Oregon is unique compared to Idaho and California and we must fund some specific work for this state. (Males) • Need more study. (Myers) • Yes. (Wustenberg) 	<ul style="list-style-type: none"> • Funding would compete with other priorities during a recession. (Ginsburg) • Money is not available. (Johnson) • May take away from funding something more important. (Wustenberg)
<p><i>C) Inspections and Technical Asst.</i></p>	<ul style="list-style-type: none"> • More ODA/DEQ staff expertise and assistance to dairies would help reduce emissions. (Ginsburg) • Always helpful. (Johnson) • If we are talking about a regulatory program, it is appropriate to get some money from the legislature. However, the majority of funds for inspections and technical assistance should come from the permit program. (Kendra) • I do not feel that it is acceptable to go to the legislature for funds to support a voluntary BMP program. (Kendra) • Need increased technical assistance. (Males) • Provide for Dept of Ag. (Myers) • 2nd party oversight might be good. (Wustenberg) 	<ul style="list-style-type: none"> • Funding would compete with other priorities during a recession. (Ginsburg) • Costs associated with it. (Johnson) • Funding. (Wustenberg)