





National Organic Standards Board  
Attn: Robert Pooler  
Agricultural Marketing Specialist  
USDA/AMS/TM/NOP  
Room 2510-S, Ag Stop 0268  
P.O. Box 96456  
Washington, D.C. 20090-6456

April 10, 2002

Re: Comment and Petition for Compost C:N Ratio,  
Processed Manures and Sodium (Chilean) Nitrate

Dear Robert:

My name is Fred Rappleye and I represent Grimmway Farms out of Bakersfield, Ca. Our company has been farming organically since 1989 and currently farms organic vegetables on over 18,000 acres. There are several issues with regards to the new National Organic Program (NOP) rules and regulations that concern us, but the following three are of vital importance.

**Compost C:N Ratio –**

The NOP rules and regulations state that compost **must** begin with an initial C:N ratio of between 25:1 and 40:1. Currently our operation uses compost produced from Dairy manure that barely has an initial C:N ratio of between 18:1 and 20:1 in addition to Chicken manure that has even less, thereby restricting their use under the new NOP regulations. We've been using dairy and chicken manures as raw product in the making of compost from the beginning of our organic operations and have seen no adverse affects. Additionally the USDA-NRCS (National Resources Conservation Service) Conservation Practice Standard Composting Facility (Code 317) states that "The C:N ratio **should** be within 25:1 to 40:1", thus implying some latitude in the initial C:N ratio. In my opinion the word should has a suggestive and/or a like this, but not required implication. Also, the USDA-NRCS, National Engineering Handbook, Part 637, Chapter 2, (210-VI-NEH, February 2000) contains the following: "An initial C:N ratio of 20:1 to 40:1 is recommended for rapid composting. However, C:N ratios as low as 14:1 also compost well...". Again, implying that having a required target of between 25:1 to 40:1 is inaccurate and not necessary in the making of good compost.

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NO5B (NOP) Petition - Compost, Processed Manure and Sodium Nitrate

In our research, if individuals practice Processes to Further Reduce Pathogens, (PFRPs) as described in Title 14, California Code of Regulations Section 17868.3 and the Environmental Protection Agency's (EPA) time and temperature requirements for composting (i.e. Maintain temperature of between 131 F and 170 F for 3 days using an in-vessel or static aerated pile system or maintain temperature of between 131 F and 170 F for 15 days using a windrow composting system, during which the material is turned a minimum of five times) then what baring does having an initial C:N ratio requirement have in the making of good compost. We would like to see this phrase either stricken from the NOP regulation or have it deemed as a suggestion, but not a requirement in the making of compost.

#### **Processed Manures –**

The NOP treats Process Chicken Pellets as raw manure in the new rules and regulations, thus restricting its use up to 120 days prior to harvest. I must again mention that our company has been using these pellets for many years without any adverse crop and/or environmental side affects. During the making of Processed Chicken Pellets, steam is injected into the mixture to soften and add moisture. The heat from the steam combined with heat generated from being pressed into pellets along with dry heat used to bring the moisture levels down, all help in the removal of microbiological organisms such as E. Coli and Salmonella. Thus adding the Processes to Further Reduce Pathogens, (PFRPs) as described in Title 14, California Code of Regulations Section 17868.3.

As long as microbiological organisms are eliminated during the making of Processed Chicken Pellets, then perhaps this product ought to be considered Processed Manure and be allowed use during the growing season. Our organizations, along with other growers throughout the nation, plant many vegetable crops that only have twenty (20) to sixty (60) day growing seasons. Therefore an application 120 days prior to harvest is virtually pointless because most of the nutrients will have depleted in the soil before crops have had a chance to be planted.

#### **Sodium (Chilean) Nitrate –**

It has come to our attention that Sodium (Chilean) Nitrate will be discussed during the NOSB meeting in Austin, Texas. We would like to make it know that our organization supports the use of this material and concur with the current NOP regulation as is it reads today. Being that this product is a mined and natural occurring material, we find no plausible reason to alter its use. As mentioned above, many vegetable crops have brief maturity spans that require instantaneous nutrients that are provided though the use of Sodium Nitrate. This is especially true during the colder seasons.

In conclusion, we would like to see the C:N ratio requirement removed or altered to a suggestive, but not required recommendation. Secondly, that some sort of Processed Manure category be established as soon as possible to support the use of products such as Chicken Pellets. And lastly, to mention that our organization supports the use of Sodium Nitrate as stated in the existing NOP regulation.

Sincerely,



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