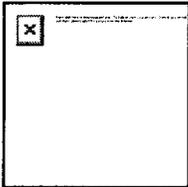


2785

From: Brownfield, Jill [jbrownfiel@state.pa.us]
Sent: Tuesday, October 13, 2009 12:59 PM
To: dhain@pahouse.net; IRRRC; kebersole@pasen.gov; Kennedy, David C. (AG); Kerry Golden; MULLER, JENNIFER; Smith, Jessie L; Thall, Gregory (GC); wgevans@pasenate.com
Subject: FW: PA Canine Health Board Submitted Public Comments
Attachments: CHB Intro and Conclusion 10-12-09.doc; CHB Public Comments MAG.doc; Cover CHB 10-12-09.doc; Verification of Calibration.doc

From: mg [mailto:mg@aprpets.org]
Sent: Monday, October 12, 2009 3:07 PM
Subject: PA Canine Health Board Submitted Public Comments

RECEIVED
2009 OCT 13 PM 2:07
INDEPENDENT REGULATORY
HEALTH COMMISSION



Please cross post in ALL states.

America's Pet Registry, Inc. Keeping You Informed

PA Proposed Regulations * Submitted Public Comments

Today is Monday October 12, 2009

*

Please cross post...

*

We see serious flaws in the current Pennsylvania Canine Health Board proposed regulations...

The Pennsylvania Canine Health Board was charged with the simple agenda to to create standards in three distinct areas (temperature-ventilation-lighting) that would coincide with ACT 119 ... the New Pennsylvania Dog Law as some now call it.

The Canine Health Board was also to address the needs for alternative or additional flooring.

There is clear evidence throughout the CHB 'proposed regulations' report of an attempt to overwrite legislation, include enforcement and establish a means to the 'standards. This is NOT their charge.

America's Pet Registry, Inc does encourage the entire re-writing of said proposal in an industry wide acceptable form that remains within the guidelines of Act 119.

Attachments

1. Introduction & Conclusion

2. Proposed Regulations as Written by the Canine Health Board with my Comments following in RED respectively.

3. U.S. Department of Labor Verification of Calibration

—

Thank You...

Michael Glass 484-880-7962 mg@aprpets.org

Rob Hurd 515-962-7552 hurdkennel@aol.com

America's Pet Registry, Inc 479-299-4418

Note: You have received these State and National alerts courtesy of America's Pet Registry, Inc. Information Services.

*
—



Introduction Part I

Submitted By: Michael Glass • October 12, 2009

This report is supported by the attendance of the author and associates having observed all of the Canine Health Board meetings in person.

I am employed as a National Field Representative for America's Pet Registry, Inc. As a lifetime and current resident in Pennsylvania, I have the opportunity to share my experience of over 31 years in various aspects of the canine industry with commercial dog breeders on a daily basis.

Please consider the following comments regarding the proposed regulations submitted by the appointed Canine Health Board relating to sections of Act 119 Pennsylvania Dog Law.

This report will show that the Canine Health Board failed in its responsibility to establish standards. There is a clear attempt of the CHB to establish a means of which is not the charge of the CHB. Regardless, the attempt to establish means has also failed.

The proposed regulations fail in two parts.

Part one, the proposed regulations that **DO** fall into the specified charge of ACT 119 are overbearing, and do not consider the multitude of variables (relating to weather conditions) that would be acceptable for the health and well being of a dog. When considering standards (weather, temperature and humidity) variables are so vast that one cannot make these limits so precise as to not allow for overlapping of these respective degrees and levels.

Part two, the proposed regulations that **DO NOT** fall into the specified charge of ACT 119 have failed as well. We suggest that no more time is wasted addressing these proposed regulations that **DO NOT** fall within the charge of ACT 119. However, if for arguments sake, we address those proposed regulations, they as well are also overbearing and do not properly address the issues.

Enforcement is only reachable through exhaustive, timely, expensive, highly trained personnel and procedures; supplied with the same in training and expensive equipment. This is not the charge of the CHB.

There is clear evidence throughout the CHB 'proposed regulations' report of an attempt to overwrite legislation, include enforcement and establish a means to the 'standards. This is NOT their charge.

We suggest the Canine Health Board (CHB) completely withdraw the submitted Proposed Regulations. A more careful explanation and understanding of their charge must be delivered to the CHB. Subsequently, we recommend a complete rewriting of the Proposed Regulations.

Introduction Part II

- We assert that the CHB acted ill informed or misunderstood as to their charge.
- Throughout the CHB meeting and discussions...it was recorded that the foundation of CHB report weighs heavily on the ability to address ammonia levels in a kennel. This as one of the most **seriously improperly addressed issues** with regards to enforceability, cost and the measuring devices themselves. There was improper and incomplete information offered as to the cost of an ammonia reading device that would be effectively used for enforcement purposes. There was no discussion regarding the needed calibration and the need for 'snap' tests. There was a lack of data that directly related to canines.
- Note: There was extensive information regarding accepted ammonia levels offered by experts in other arenas of the enclosed' animal community'. Subsequent to this extensive interviewing the entire research was discounted as "...All of those animals (cows, sheep, pigs etc,) ...are not dogs."
- Please see the report attached that addresses the issue of ammonia readers.
- The CHB failed to interview any commercial dog breeders or commercial dog breeding kennel builders. The request from one CHB member to ask for this expert testimony was discounted by the statement from another CHB member, "We do not need experience we need data".
- Where multiple times data was stated as not available, statements were made to the effect of "...we can re visit this in a year..." This is illustrated, by the very statements from the CHB, "...the lack of data available."
- The CHB failed in its review and consideration for alternative flooring. Their proposed regulation is redundant to ACT 119 itself and offers NO alternative.
- The CHB failed to address exercise areas 'in addition' to those required by Act 119.
- The following comments in our report will directly address more detailed concerns relating to ventilation.
- Detailed conversation as the requirements to bring in an engineer. Research to the ACT 119 requirements to allow this was misstated. An engineer must work for the department full time.
- The CHB was to only establish STANDARDS not means or methods.
- We find surmountable evidence contrary to the fiscal impact report. This is detailed in my comments in the following report.

Conclusion

The CHB failed in its charge to establish standards for lighting, ventilation and flooring. The CHB proposed regulations go outside of the scope of its charge and creates confusion, vagueness and dictates enforcement.

There is evidence throughout the CHB proposed regulations of an attempt to overwrite legislation, include enforcement and establish a means to the standards. This is NOT their charge.

The fiscal impact does not reflect the actual effect of the proposed regulations as they will be applied to ACT 119. There will be a gross negative fiscal impact. Although we understand and accept that fiscal impact may be an unfortunate byproduct, we are confused as to why the report does not properly address an accurate fiscal impact. We see the CHB report as misleading.

We do encourage the re-writing of said proposal in an industry wide acceptable form.

The attached detailed public comments are addressed individually in RED following each CHB statement or proposed regulation.

Respectfully Submitted By,

MICHAEL GLASS

America's Pet Registry, Inc

118 Mulberry Court • Collegeville • Pennsylvania 19426

484-880-7962

mg@aprpets.org

Public Comments Submitted by: Michael Glass

October 12, 2009

*** * * * ***

PROPOSED RULEMAKING

CANINE HEALTH BOARD

Canine Health Board Standards for Commercial Kennels

Comments submitted in R E D following Canine Health Board report.

*** * * * ***

The Canine Health Board (Board), created under section 221 of the Dog Law (3459-221) (act), through the Department of Agriculture (Department), as P.S. § set forth under section 221(g) of the act, proposes to create Chapter 28a (relating to canine health board standards for commercial kennels). Section 221(f) of the act charges the Board with the duty to determine standards to provide for the health and well being of dogs in the specific areas of ventilation, lighting and floors in commercial kennels. The Board was required to and did issue temporary guidelines published at 39 Pa.B. 310 (January 17, 2009), which are to be promulgated as regulations by the Department as set forth in section 221(g) of the act. The Board proposes to create specific standards that will protect the health and well being of dogs in commercial kennels (Class C kennels).

Rather than the CHB establishing standards for the “health and well being” of a dog according to the direct charge of Act 119...they attempted to establish standard for every aspect of the commercial kennel and dog that would relate to its “health and well being”. This is beyond their charge, responsibility and not within their limitations.

More so, the CHB admits they are to consider Act 119 “in narrow specific areas” as it directly relates to health and well being. The CHB went far beyond that scope.

Background

The proposed regulations are required under sections 207(h)(6), (7) and (8), 459-207(h)(6), (7) and (8), (i)(3) and (i)(3) and 221 of the act (3 P.S. §§ 459-221). The intent of the regulations is to create ventilation, lighting and additional flooring standards that will protect the health and well being of dogs housed in Class C kennels. These provisions are necessary as the act created the Board and directed it to address these limited issues.

We state the CHB goes outside the boundaries of its charge, limitations and responsibility. As shown above: the limits are listed. "Additional flooring" is not addressed. There is evidence to define and regulate current flooring; which is not the charge of the CHB.

The major features of the proposed regulations are summarized as follows:

Summary of Major Features

Section 28a.1. Definitions.

This section defines various terms utilized in the body of the regulations to further clarify the regulations.

Section 28a.2. Ventilation.

Standards are established to satisfy the directive of section 207(h)(6) and (7) of the act regarding ventilation. Specifically, the proposed regulation addresses poor ventilation conditions that cause health and welfare problems in dogs, by establishing specific ventilation standards that must be met to ensure that these health and welfare problems do not develop. The specifics include that ventilation must be achieved through a mechanical system that will allow for 8—20 air changes an hour, keep consistent moderate humidity, institute auxiliary ventilation when the temperature rises above 85°F, keep ammonia levels and particulate matter at established levels and keep odor minimized as it is a sign of disease and bacteria growth.

Point: It is not the charge of the CHB to establish a means (mechanical system). There are limitations set here that are not the charge of the board or within the legislation of ACT 119. As well, this proposed regulation will not allow for other possible means to ensure the standard.

It is not reasonable to state "...ventilation must be achieved through a mechanical system..." There may be other means.

This does not allow for a system that may provide for less than 8 or more than 20 air changes.

The CHB addresses 'particulate matter'. Particulate matter will affect the accuracy of ammonia readings. This is not within the charge of the CHB. Either way this proposal is far reaching and does not allow for countless variables.

Section 28a.3. Lighting.

The proposed regulation delineates lighting standards of both natural and artificial light in accordance with the Board's duty and requirements set forth in section 207(h)(8) of the act.

Section 28a.4. Flooring.

The Board through this proposed regulation has approved solid flooring to be appropriate for use in Class C kennels as well as the flooring already approved in the legislation in accordance with section 207(i)(3) of the act. The proposed regulation establishes the standards to be met if solid flooring is utilized.

Point: As solid flooring is currently accepted in Act 119 we find;

The CHB proposal is redundant to the law. This does not illustrate that the Board addressed the use of alternative flooring.

Essentially reading “The Board has approved solid flooring ... as well as the (SOLID) flooring...”

POINT: The CHB failed to identify ADDITIONAL flooring for primary enclosures.

The request from one of the CHB members to ask for this expert testimony was discounted by the statement from another CHB member, “We do not need experience we need data”. This statement is on record.

POINT: The CHB failed to address any commercial breeders, dog kennel builders, or non solid flooring experts.

Fiscal Impact

We understand that the intent of the CHB is to show that the proposed regulations will not create a fiscal impact in many areas- This is not true. Cost of equipment, enforcement, additional paperwork & forms, has been not properly represented. There will be many increased costs.

The CHB had lengthy discussion with regard to, “...if we are creating these standards...we need to record and measure these standards...” This WILL generate excessive inspections, documentation, new forms, paperwork and increased costs.

Commonwealth

The proposed regulation, once published as final-form regulations, would impose additional fiscal impacts upon the Department's Bureau of Dog Law Enforcement (Bureau). Once the final regulations are in place, additional fiscal impacts will be imposed. Those costs will be paid for entirely from the Dog Law Restricted Account. No general fund money will be used. The Department, in the Regulatory Analysis Form that accompanies the proposed regulation, has set forth an estimate of costs to the Bureau to enact and enforce the new regulatory standards that would be imposed by the final regulations.

NOTE: Our research into the costs of the equipment needed does NOT reflect the estimates of the CHB. The cost of equipment that will be required for proper enforcement far exceeds the cost of equipment that might be used for non enforceable needs. I.e. measuring standards for personal health and safety. Regardless, this is not the charge of the board.

Commonwealth (continued)

It is important to remember that four million dollars has been removed from the Dog Law restricted account to which the moneys are to be received from an account that no longer exists. The department currently reports serious economic concerns within 3 years not including the potential of this proposal if placed in effect.

The time needed for enforcement by the officers far exceeds the estimates of the CHB. While it is quoted, "...all of these reading can be taking in less than a minute." This is not true for enforceable needs. The time constraints of the readings needed directly relates to the quality of equipment used. Which in turn is grossly reflected in the equipments increased cost.

By observation, the CHB clearly stated that a major foundation of standards will be the reading of AMMONIA LEVELS. The cost, calibration, training and time for inspections have been grossly underestimated. Calibration report attached.*

*The issue of full calibration as well as a 'snap test was not addressed which will add to the time for enforcement and cost for use of the equipment.

Political Subdivisions

The addition of mechanical ventilation, additional artificial or natural lighting and flooring changes may require UCC permit and inspections. This should not specifically increase or decrease costs to local governments, however. Documentation from the Center for Local Government Services, Department of Community and Economic Development (DCED), confirms that municipalities are collecting fees to cover the expenses of Pennsylvania Uniform Construction Code (UCC) administration and enforcement, so that these proposed regulations will not have a fiscal impact on municipalities. Any additional workload generated by the regulation would be offset by the fees collected in association with the specific permit.

The enforcement of the regulations will neither increase nor decrease any costs to local governments. Compliance with the ventilation, lighting and additional flooring standards required of Class C kennels standards will be enforced solely by the Department. Local governments will have no role in enforcement or any other area associated with the regulations in the Commonwealth.

Most municipalities do not have commercial kennels. Nearly all are in 10 of the 67 counties—more than half are in Lancaster County. Commercial kennels represent about 15% of the total number of kennels regulated by the Department.

Although the report here states: "...neither increase nor decrease any costs to local governments..." we find this to be prejudice to the "...nearly 10 of the 67 counties..." This suggests that...there are no costs ...but if there were costs...the cost would only affect 10 counties. We see the possibility and foresight from the CHB for UNINTENDED CONSEQUENCES in this issue.

Private Sector

The regulations once published as final-form regulations will impose additional costs, at least for initial compliance, on the regulated community (Class C kennels). Class C kennels will likely have to make changes (some significant depending on the current state of their kennel operation) to comply with the ventilation and lighting provisions of the regulation. The flooring provisions of the regulation actually expand the type of flooring allowed under the act, in section 207(i)(3) and do not impose any new requirement. The costs to the regulated community will be varied, depending on the size and condition of the existing kennel. The Department has provided an estimate of costs to existing Class C kennels for compliance with the new standards in the Regulatory Analysis Form that accompanies these proposed regulations.

This is confusing. Above is stated "...The flooring provisions of the regulation actually expand the type of flooring allowed under the act, in section 207(i)(3) and do not impose any new requirement..." There is no discussion of additional flooring. Only "Solid" flooring is mentioned in this proposal. Kennels will NOT be allowed to use the current flooring used by many. Resulting is substantial increased costs in this arena also.

Although the proposal admits increased costs for initial compliance, such costs offered do not reflect properly on the current finding from the dog breeders. No attention is given to the dog breeders need for training and equipment to maintain data to ensure remaining in compliance.

Also, NOT TRUE stated, "...(flooring does) not impose any new requirement..." This is quite the opposite and has become one of the most addressed concerns in increased costs while also relating to cage size..."

General Public

The regulations, once promulgated as final-form regulations, may raise the cost of purchasing a dog and therefore **may affect** purchasers of dogs. However, the general public will benefit from the implementation of the standards in the regulations, as the standards are intended, as were the amendments to the Dog Law that precipitated the regulations, to improve the health and welfare of the dogs and puppies that are sold to the general public. There are no mandatory requirements imposed on the general public by the regulation.

Note: One minor adjusted request regarding "may raise" and "may affect". The changes regardless of the reason "WILL raise" and "WILL affect" the general public.

Paperwork Requirements

The Department will not have to develop a large array of new application forms or review procedures, but in some cases may want to amend current forms. The Department will have to develop forms related to ventilation calculations.

Not True. The very creation of these standards is to be the backbone of ensuring and enforcing the health and well being of dogs. The very charge was to create standards for the needs of a dog, subsequently creating a foundation for data to be collected for current enforcement, future use and the possible need for future prosecution.

It has also been recorded at the CHB meetings the need to collect this data and to 'revisit these issues next year'.

Paperwork Requirements (continued)

As well, the CHB report addressed that... “The Department will not have to develop new application forms or review procedures, but in some cases may want to amend current forms.”

Not True. It will be the inspection forms that will generate the need for more excessive paperwork as dictated by the need for the number of samples needed to be taken to ensure proper reading variations.

Annex A

DEPARTMENT OF AGRICULTURE TITLE 7.

DOG LAW ENFORCEMENT BUREAU PART II.

(Reserved) CHAPTER 28.

28.1—28.3. (Reserved). §§

**CANINE HEALTH BOARD STANDARDS FOR COMMERCIAL KENNELS
CHAPTER 28a.**

GENERAL PROVISIONS

Ventilation. § 28a.2.

Proper ventilation helps ensure that dogs are healthy and not stressed. Each area of the kennel where dogs are present must utilize a functional, mechanical ventilation system that provides ventilation to satisfy the requirements of this section. The following standards shall be met at all times that a dog is present in the facility:

Point: It is not the charge of the CHB to establish a means (mechanical system). There are limitations set here that are not the charge of the board or within the legislation of ACT 119. This proposed regulation will not allow for other possible means to ensure the standard.

It is not reasonable to state “...ventilation must be achieved through a mechanical system...” There may be other means.

This does not allow for a system that may provide for less than 8 or more than 20 air changes.

The CHB addresses ‘particulate matter’. This is not within the charge of the CHB. Either way this proposal is far reaching and does not allow for countless variables, and is sustained by the CHB via conjecture.

Point: It is not the charge of the CHB to establish a means. Natural conditions may exist (frequently) that will allow for any standards to be met. This clearly states “MUST”. There are limitations set here that are not the charge of the board or within the legislation of ACT 119. As well, this proposed regulation will not allow for other possible means to ensure the standard.

(1) When the ambient air temperature is 85° F, a form of mechanical ventilation capable of reducing air temperature shall be utilized to reduce air temperature where dogs are present. If the ambient air temperature in any portion of the facility is 86° F or higher, despite mechanical ventilation utilized, dogs may not be present in those portions of the facility. This paragraph does not apply to outdoor exercise areas.

This does not allow for the simple ‘opening of a window’. When such may be perfectly effective to lower the temperature. The charge of the CHB was not to establish a standard BELOW 86 degrees. Quite the opposite. The charge was to establish a standard for above 85 degrees. The CHB response to ACT 119 here is “...not ever allowed to happen...” rather than creating an effective standard.

(2) When the temperature is 50—75° F, the relative humidity shall be in the range of 40—60%. The relative humidity shall be measured at standing shoulder level of 10% of the dogs in the kennel, randomly selected from all rooms. Relative humidity may not be measured in a primary enclosure within 30 minutes of the completion of active cleaning of that primary enclosure.

(3) When the temperature is above 75° F, the relative humidity shall be 1%—50%. The relative humidity shall be measured at standing shoulder level of 10% of the dogs in the kennel, randomly selected from all rooms. Relative humidity may not be measured in a primary enclosure within 30 minutes of the completion of active cleaning of that primary enclosure.

Point: It is not the charge of the CHB to establish methods of enforcement. The request for 10% measurements goes to enforcement of which is not the charge of the board. The 10% requirement is entirely arbitrary, and has absolutely no support to sustain its proposal.

Point: The CHB sets a minimum humidity level as a requirement. Lower humidity levels may be perfectly acceptable for the health and well being of the dog. Data for this standard was derived from research of other non-dog animals. Additionally, information offered to the CHB...confirms the data used to establish ‘guidelines’ could not be used as it was not derived from ‘dog’ research.

The CHB illustrates that humidity levels below 40% shall not be acceptable.

Also...we see this as excessive. There are too many variables and ranges.

These humidity levels were established on conjecture not data. It was stated by the CHB that there will be a need to collect data on this regard and revisit this issue next year. There was excessive information offered by industry representatives to confirm this.

The standards do not address the needs for varied humidity levels for whelping, orphaned or ill puppies.

The requirement of 10% of the dogs in the kennel being selected is:

- **Entirely arbitrary-there is no data or experimental results to support this amount.**
- **Does not require the inspector to vary the locations of an individual room...only requires the random selection of dogs within that room. This is not to say all of the dogs may be in one section of the individual room.**
- **Does not require various breeds with various shoulder heights.**
- **Does not dictate the methods of random selection**
- **Does not consider if the kennel is one room.**
- **There will be increased need for documentation and paperwork**

This goes to inconsistency and enforcement and confusion.

(4) Ammonia levels must be less than 10 ppm. The ammonia level shall be measured at shoulder level of dogs housed in the primary enclosure of 10% of the dogs in the kennel at standing shoulder height, randomly selected from all rooms, as well as on the floor of the four corners of the housing facility and at least one location on the floor along each wall of the facility. Ammonia in a primary enclosure may not be measured within 30 minutes of the completion of active cleaning of that primary enclosure.

The CHB demands that the ammonia levels are THE MOST IMPORTANT foundation to establishing the level of proper housekeeping and maintenance of a kennel although not a consistent measure for the health of a dog.

It is important to know that detailed information and research about ammonia readers was offered at the CHB meetings. The CHB would want the report to reflect the ease of use and expense of ammonia readers. We find information contrary to this. See the report attached.

Research into the costs of the equipment needed does NOT reflect the estimates of the CHB. The cost of equipment that will be enforceable far exceeds the cost of equipment that might be used for non enforceable needs.

The time needed for enforcement by the officers far exceeds the estimates of the CHB. While it is quoted "all of these reading can be taking in less than a minute" this is not true for enforceable needs. The readings time constraint directly relate to the quality of equipment used. This in turn is grossly reflected in its increased cost.

The issue of calibration, full calibration and a 'snap test' was not addressed which will add to the time for enforcement and cost for use of the equipment.

There was minimal discussion for Dog warden training regarding the use of this equipment.

Point: It is the charge of the CHB to establish the standard. This temporary guideline goes to enforcement of which there is controversy and well as jurisdiction of the charge of the board.

The requirement of 10% of the dogs in the kennel being selected is the same as stated above.

(5) The means of ventilation employed must ensure that carbon monoxide (CO) levels are maintained below detectable levels in all areas of the kennel. Kennels shall install and maintain CO detectors with the ability to monitor the CO level throughout the entire facility. The detectors must meet or exceed the UL standard 2034 or the IAS 6-96 standard, or its successor standards.

This is not the charge of the CHB. Observation of the activity of the CHB showed a definite attempt to address the entire range of "the health and well being" of a dog and subsequently goes outside the scope of Act 119.

Although, 'odors' are addressed in ACT 119...Carbon monoxide is NOT a charge of the CHB. Although we agree this may create a safety standard...it is not a charge of the board...creates undue levels of inspection and additional paperwork (reminding that paperwork is stated by the CHB as not increased) additional unenforceable levels for enforcement.

We suggest this be omitted in full.

(6) In the event of a mechanical system malfunction, the kennel must have windows, doors, skylights, or other openings in the structure that are operable to maintain ventilation. In the event of a mechanical system malfunction, the kennel shall contact the Bureau of Dog Law and consult on the steps to be taken to protect the health and well being of the dogs and take steps to correct the malfunction immediately.

Point: It is NOT the charge of the Board or their expertise to establish a means or mechanical system. In one section the CHB state that a mechanical system “must’ be used. It is not stated as to the relationship of the mechanical malfunction and its concern. The law needs to be precise. It is not the charge of the board to insist on what the kennel ‘must have’ as stated above.

This does not allow for a back up system, a natural system ,...secondary system or consideration for use of a generator.

Further, we find it absurd that the kennel, “... shall contact the Bureau of Dog Law and consult on the steps to be taken...” as stated above. We are entering into a realm of needed education, enforcement and liability to which I have confidence the department is not prepared for...nor will the cost allow.

The Bureau of Dog Law Enforcement are not experts and they are not trained in mechanical systems. They are solely trained as to the requirements set forth by law for kennel facilities and to inspect those facilities respectfully.

There is no evidence of a ‘standard’.

This is not the charge of the board and request this be omitted in full.

(7) The means of ventilation employed must ensure that particulate matter (PM) from dander, hair, food, bodily fluids, and other sources in a primary enclosure are below 10 milligrams per meter cubed. The PM shall be measured at shoulder level of dogs housed in the primary enclosure of 10% of the dogs in the kennel. The PM may not be measured within 30 minutes of the completion of active cleaning of that primary enclosure.

Point: It is not the charge of the CHB to establish a standard for particulate matter. This goes beyond the scope of the charge of the CHB. Regardless, the attempt to address particulate matter is vague, arbitrary, and does not address external variables.

Observation of the activity of the CHB showed a definite attempt to address the entire range of “the health and well being” of a dog and subsequently goes outside the scope of Act 119.

The requirement of 10% of the dogs in the kennel being selected is the same as stated above.

This is not the charge of the board and request it be omitted in full.

(8) The following requirements apply to air changes:

(i) The kennel shall provide between 8—20 air changes of 100% fresh air per hour in each room of the facility that houses dogs.

Point: This must state ‘when needed’ with regard to maintaining the set standards. If the standards are met, regardless of the means, this must not be a requirement unless an adverse situation exists...given the corrected and accepted requirements.

However, if presented as a means for PREVENTION...we recommend a minimal air changes are required with the ability to increase. Such will have to be a demand 100% of the time ...if that exists.

Barring the creating of excessive wind in the kennel, if a kennel owner sees fit to increase the air changes, this must not be limited. There may be such an air exchange unit that allows this. I.e. only a minimum ought to be set.

The demand for 8-20 insists for adverse conditions exist. We also insist that a minimum of 8 air changes per hour is excessive.

We need a definition and/or better understanding for fresh air. There is a concern for the availability of filtered air and its being accepted legally. We show...what if the outside “fresh air” conditions are adverse. We must also consider the realistic capability to adjust the ‘fresh air’ to meet acceptable temperature and humidity levels.

The CHB does not address the different needs of a dog regarding whelping, geriatric, orphaned puppies or breed etc...

(A) The air changes shall be calculated using the following information supplied by the kennel to the Department:

(I) The volume of the facility.

(II) The linear dimensions of the facility.

(III) The number of primary enclosures.

(IV) The cubic feet occupied by each primary enclosure.

(V) The dimensions of all intake or exhaust vents of any fans as well as their capacity, or other system specifications.

This is incomplete in its request for “...intake and exhaust...” Do we take into account for windows, doorways or other openings? There are too many variables.

Is there also a need to include number of dogs or puppies in the indoor facility? There is a need to calculate the type of primary enclosure structure and whether or not the sides are solid or open. All of these can be factors to consider.

This simply goes to excessive over burdensome record keeping. By virtue of an inspection as required by ACT 119, this will ensure the facility is kept in compliance. Submission of the specifics of the measurements needed to be the responsibility of the inspector not the inspected. The calculations needed for enforcement of prosecution must be taken and confirmed by the issuing officer of a citation.

This is not the charge of the board and request it be omitted in full.

(ii) Air velocity measurements will be taken at all intake vents or exhaust vents and at shoulder level of dogs housed in the primary enclosure for 10% of the dogs in the kennel randomly selected from each room.

This goes to definition of proper ventilation and is NOT the charge of the board. Simply, the Standard for ventilation is the charge...additional factors go to enforcement, systems and means.

This goes to inspections which is not the charge.

The requirement of 10% of the dogs in the kennel being selected is the same as stated above.

(iii) The kennel owner shall be in violation if one or more of the following apply:

(A) The computed air change rate based on the data submitted under subparagraph (i) is not 8—20 air changes per hour.

(B) If the air change rate as measured at the vents is not 8—20 air changes per hour, and there is a simultaneous noncompliance with any of the requirements in paragraphs (1)—(7), (9)—(12) or this paragraph.

(C) If the measured velocity reading at standing dog shoulder height does not result in a computation of 8—20 air changes in the primary enclosure and the air change in subparagraph (i) is satisfactory violation will not be issued unless there is a simultaneous noncompliance with any of the requirements in paragraphs (1)—(7), (9)—(12) or this paragraph.

(iv) If a computation or measurement under subparagraph (iii) is not satisfactory, the kennel owner shall take the necessary steps to meet the requirements.

The entire preceding five paragraphs ought not to be addressed. And immediately discarded as such goes to enforcement. Enforcement and inspections is not the charge of the CHB. Although the kennel owner is responsible for any compliance needs, the kennel owner must not be required to submit data that may incriminate.

This is not the charge of the board and we request this be omitted in full.

(v) The Department may hire or consult with an engineer to recommend improvements be made to kennels to meet compliance with this paragraph.

A search warrant is required if the 'engineer' is not a full time employee of the Department.

The CHB failed in their research for this information and misquoted the requirements for an engineer to have the jurisdiction to enter a kennel.

Contrary to the CHB statements, there will be fiscal impact. There was no information offered as to the cost of an engineer. The only mention was that of a per diem.

However this is not the charge of the board and request this be omitted in full.

(9) Dogs may not exhibit conditions or signs of illness or stress associated with poor ventilation, including the following:

- (i) Excessive panting.
- (ii) Elevated body temperature.
- (iii) Active avoidance of areas of the kennel.
- (iv) Shivering.
- (v) Huddling of dogs 12 weeks of age or older.
- (vi) Mucous dripping from the nose of a dog.
- (vii) Redness or crusting of eyes or nose.
- (viii) Runny eyes.
- (ix) Blindness.
- (x) Coughing or sneezing.
- (xi) Moist areas of hair.
- (xii) Diarrhea.
- (xiii) Bloody diarrhea.
- (xiv) Vomiting.
- (xv) Listlessness.
- (xvi) Presence of blood.
- (xvii) Death.

Although we understand, we find this section misdirected and not the charge of the CHB. We agree the signs ought to be trained to the inspector. We see that these sign ought to be foundation for the very charge that the CHB failed to address.

However this is not the charge of the board and request this be omitted in full.

(10) The air in the facility may not have excessive dog odor, other noxious odors, stale air, moisture condensation on surfaces, or lack of air flow.

(11) When employing mechanical means of ventilation and recirculating air, the air shall be filtered with small particle, nonozone producing air filters.

(12) All ventilation systems must comply with the latest edition of applicable codes.

We find the preceding three paragraphs go to discussion, enforcement, means and inspections. Although this may be interesting and informative...or may be discussion that may lead to a conclusion.

The CHB report was only to have dealt only with standards.

We suggest this be omitted in full.

Lighting. 28a.3. §

Natural lighting is important to the development of dogs. Each kennel shall have a mix of natural and artificial light, provided in the following manners:

Act 119 clearly states “OR” artificial light not “AND”

We see this as a basis for an entirely misleading proposal.

(1) *Natural light.*

(i) Each dog shall have exposure to light from natural sources passing through external windows, external sky lights or other external openings.

(ii) The minimum combined total of net glazed area of external windows, external sky lights or area of other external openings through which natural light passes within each room where dogs are housed may not be less than 8% of the floor space. All external windows, external skylights and external openings must be transparent and unobstructed to satisfy this section.

This states, “...all external...” and therefore does not allow for an area above the minimum to be unobstructed as needed.

Also, ‘Unobstructed’ is vague. We need to consider window shading, sunlight and weather condition variables.

The CHB was only to establish a standard...not where that standard arises from.

(iii) Dogs shall be protected from excessive light.

Although we agree with this statement. This does NOT go to a standard. This goes to enforcement and Dog Warden training if the standards are not met. This is vague and undefined.

We suggest this be omitted in full.

(iv) Outdoor exercise areas shall provide an area of shade large enough to protect all the dogs utilizing the exercise area from the direct rays of the sun.

The charge was to set a standard for lighting ---ACT 119 clearly refers to inside standards. The outside environment goes to Dog Warden enforcement. This is NOT the charge of the CHB.

We suggest this be omitted in full.

(v) If a kennel is granted a waiver for indoor exercise under section 459-207(i)(6)(x)(B)), the primary 207(i)(6)(x)(B) of the act (3 P.S. § enclosure must be configured to allow natural light to come into each primary enclosure.

(vi) If a kennel is granted a waiver for indoor exercise under section 459-207(i)(6)(x)(B)), full spectrum 207(i)(6)(x)(B) of the act (3 P.S. § lighting shall be provided for the entirety of the daytime cycles in areas that house dogs.

There is not a standard set here which is the only charge of the CHB. The term 'full spectrum' has not been properly addressed. Certain lighting that emits 'full spectrum' is completely useless...without a full understanding of the other variable needed to know. Many are not aware that the distance that one is from the light source has to do with the effectiveness of the source. Such that although there is a demand here for 'full spectrum' without a complete knowledge of this source the efforts may be useless.

(2) *Artificial light.*

(i) Artificial, indoor, daytime lighting must provide full spectrum lighting between 50—80 foot candles at standing shoulder level of the dogs for daytime lighting.

Please refer to above statements in red regarding full spectrum.

NO data is offered to understand the needs for full spectrum lighting. Many do not understand the needed environment and location of lighting relative to the animal to benefit from "full spectrum" lighting. This does not allow for more lighting if needed.

Why must indoor artificial lighting be full spectrum if natural lighting is also available that offers the accepted standard?

The charge of the board, is to establish the 'lighting ranges' not the means or methods regarding artificial or natural.

Does this suggest that 80 foot candles are the maximum and a citation may be issued above that? Or, does this suggest that regardless of the natural lighting via window...that an additional maximum of 80 foot candles of artificial lighting is required.

This statement of the board also lends us to believe that the CHB understands 'artificial lighting'. However, the CHB sets 'guidelines' that "windows will be required". This is confusing.

Night time artificial lighting must be 1—5 foot candles at standing (ii) shoulder level of the dogs of lighting.

This needs to state ‘shall be a minimum’...the current guideline suggests that if the lights are on at night—a warden may issue a citation. As well, this infers that if an inspection is done at night the lighting must be 1-5 foot candles. This does not consider ‘winter hours’ for inspections.

Is lighting not allowed to be 6 foot candles? We understand the desire for a minimum. However, we find this too restrictive and does not allow for variables.

(iii) Artificial lighting provided must approximately coincide with the natural diurnal cycle.

“Must” and “approximately” contradict each other. This is vague and confusing.

(iv) Lighting sources may not have a visible flicker.

There is ABSOLUTLEY NO justification for this. I accuse an undertone of prejudice.

It is not the charge of the board and request this be omitted in full.

(v) Light sources, whether their primary purpose is to provide heat or light, shall be provided in a manner that prevents dogs from touching a light, fixture, bulb, switch or cord.

Although we may agree that this address safety issues...this is not a standard of ‘lighting needs’.

Goes to enforcement and safety codes--- although we agree this may be a safety factor.

This is not the charge of the board and request this be omitted in full.

(3) *Applicable codes.* All lighting must comply with the latest edition of applicable codes.

Goes to enforcement and safety codes--- although we agree this may be a safety factor.

This is not the charge of the board and request this be omitted in full.

Flooring. 28a.4.

Point: As solid flooring is currently accepted in Act 119 we find;

The CHB proposal is redundant to the law. This does not illustrate that the Board addressed the use of alternative flooring.

Essentially reading “The Board has approved solid flooring ... as well as the (SOLID) flooring...”

POINT: The CHB failed to identify ADDITIONAL flooring for primary enclosures.

The request from one of the CHB members to ask for this expert testimony was discounted by the statement from another CHB member, “We do not need experience we need data”. This statement is on record.

POINT: The CHB failed to bring in any commercial breeders, dog kennel builders, or non solid flooring experts.

The CHB enjoys going into detail regarding enforcement, descriptions, applications, and other variables when considering the construction of flooring...all the while NOT addressing their very charge; which is the acceptance of ADDITIONAL flooring.

Proper flooring is essential for normal behavior and proper orthopedic development of the dogs. For dogs over 12 weeks of age, the flooring must meet the standards in the act or as set forth as follows:

(1) In addition to the flooring already approved in section 207(i)(3) of the 459-207(i)(3)), solid flooring is approved for use. act (3 P.S. §

Point: As solid flooring is accepted in Act 119 we find:

By virtue of the fact the solid flooring is allowed in ACT 119 the above statement as delivered by the CHB is redundant...

“The Board has approved solid flooring ... as well as the (SOLID) flooring approved.

This does not illustrate that the CHB addressed the use of alternative flooring.

The CHB failed to identify additional flooring for primary enclosures.

The words ‘in addition to’ are used...however there is NO Additional flooring mentioned.

(2) Solid flooring must be sloped to a drain that is free of debris and in good repair.

This does not go to additional flooring. This is an attempt to regulate current law and attempt to regulate enforcement.

This is not the charge of the board and request this be omitted in full.

(3) Drain covers shall be provided and shall be securely fixed and made of a non corrosive substance.

This does not go to additional flooring. This is an attempt to regulate current law and attempt to regulate enforcement.

This is not the charge of the board and request this be omitted in full.

(4) Flooring may not be metal nor any other material with high thermal conductance. This does not exclude the use of radiant heat flooring, or a flooring system to cool, provided that a dog has an area to escape the heat if it gets too warm or too cold.

This does not go to additional flooring. This is an attempt to regulate current law, inspections and attempt to regulate enforcement.

We see no reason for this exclusion. We also see no reason for a possible list of inclusion. Innovations in materials occur regularly. This does not properly address the issue as requested from the CHB hypothetically; we can begin a list of common sense flooring that may not be used.

Stainless steel flooring is commonly used.

This is not the charge of the board and request this be omitted in full.

(5) All floors and drains must comply with the latest edition of applicable codes.

This does not go to additional flooring. This is an attempt to regulate current law, inspections and attempt to regulate enforcement.

This is not the charge of the board and request this be omitted in full.

(6) The surface of the flooring must provide the dogs with good footing. Examples include sealed concrete, painted concrete, epoxy flooring, sealed wood, textured and sealed tile.

First...the use of 'examples' may lead to confusion and a false lead to acceptance that may include or restrict other possible accepted applications.

This does not go to additional flooring. This is an attempt to regulate current law, inspections and attempt to regulate enforcement.

This is not the charge of the board and request this be omitted in full.

(7) Flooring shall be cleaned in accordance with section 207(h)(14) of the act and may be subject to microbial assessment.

This does not go to additional flooring. This is an attempt to regulate current law, inspections and attempt to regulate enforcement.

This is not the charge of the board and request this be omitted in full.

(8) Flooring may not be made of or coated with materials that are toxic to dogs.

The charge of the board was to discuss what additional flooring IS accepted. Not to discuss what is NOT accepted. We do not understand why the CHB introduce into a proposed regulation that a dog breeder may not place a dog on poison. This would go to an animal cruelty issue.

This is an attempt to re write law that has already been addressed. This is also an obvious attempt to generate excessive restrictions opposed to additional practices.

The words 'in addition to' are used...however there is NO Additional flooring mentioned.

This does not go to additional flooring. This is an attempt to regulate current law, inspections and attempt to regulate enforcement.

This is not the charge of the board and request this be omitted in full.

Respectfully Submitted,

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Public Comments:
Proposed Regulations and Standards for Commercial Kennels
Regulation ID # 2-170 #(2785)

To:
Canine Health Board
c/o Department of Dog Law
2301 North Cameron Street
Harrisburg, PA 17110

Submitted By: Michael Glass

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October 12, 2009

Attachments

1. Introduction & Conclusion
2. Proposed Regulations as Written by the Canine Health Board with Public Comments following in RED respectively.
3. U.S. Department of Labor Verification of Calibration



U.S. Department of Labor Occupational Safety & Health Administration

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Occupational Safety and Health Administration
Directorate of Science, Technology and Medicine
Office of Science and Technology Assessment

Verification Of Calibration for Direct-Reading Portable Gas Monitors

Safety and Health Information Bulletins

SHIB 05-04-200

This Safety and Health Information Bulletin is not a standard or regulation, and it creates no new legal obligations. The Bulletin is advisory in nature, informational in content, and is intended to assist employers in providing a safe and healthful workplace. The Occupational Safety and Health Act requires employers to comply with hazard-specific safety and health standards. In addition, pursuant to Section 5(a)(1), the General Duty Clause of the Act, employers must provide their employees with a workplace free from recognized hazards likely to cause death or serious physical harm. Employers can be cited for violating the General Duty Clause if there is a recognized hazard and they do not take reasonable steps to prevent or abate the hazard. However, failure to implement any recommendations in this Safety and Health Information Bulletin is not, in itself, a violation of the General Duty Clause. Citations can only be based on standards, regulations, and the General Duty Clause.

Introduction

Gas monitoring instruments are designed to protect personnel from unseen hazards that may exist in workplace environments, including confined spaces. It is vital to worker safety that these instruments are maintained and calibrated properly.

Instrument inaccuracy due to improper or irregular calibration can lead to serious accidents. Exposure to excessive levels of toxic gas or an oxygen-deficient environment can cause workers serious illness and even death. Combustible gas explosions are often catastrophic, injuring or killing personnel and destroying property.

The International Safety Equipment Association (ISEA), founded in 1933, is a trade association for manufacturers of protective equipment, including environmental monitoring instruments. The ISEA recommends, at a minimum, verification of sensor accuracy before each day's use.

The only way to guarantee that an instrument will detect gas accurately and reliably is to test it with a known concentration of gas. Exposing the instrument to a known concentration of test gas will show whether the sensors respond accurately and whether the instrument alarms function properly.

Calibration: The Key to Accurate Readings

Gas detection instruments are used to detect the presence of toxic and combustible gases, as well as oxygen deficiency or oxygen enrichment (a fire and explosion hazard). Workers cannot rely on their sense of smell to alert them to odorless hazards, necessitating the use of gas detectors whenever a worker enters an area with potential atmospheric

hazards.

"Calibration" refers to an instrument's measuring accuracy relative to a known concentration of gas. Gas detectors measure the concentration of a gas in an air sample by comparing the sensor's response to the response generated by a calibration gas of a known concentration. The instrument's response to the calibration gas serves as the measurement scale or reference point.

The responsiveness of electrochemical sensors will vary with environmental conditions. Sensor response will be different (lower or higher) depending on the actual environmental conditions. Therefore, as much as possible, the monitors should be calibrated at environmental conditions that are the same as (or similar to) actual field conditions.

Calibration at locations where the equipment is to be used is always preferable.

Most instruments are equipped with two levels of alarms – warning and danger. The warning alarm alerts the user that the environment has a detectable concentration of gas and is therefore potentially hazardous. The danger alarm indicates that the gas concentration exceeds the programmed "hazard" threshold, and the area is approaching a hazardous level. Whether an instrument warns and/or alarms at the proper time depends on its detection abilities and its ability to translate its findings into an accurate reading.

If the instrument's reference point has shifted, the reading will shift accordingly and be unreliable. This is called "calibration drift" and it happens to all detectors over time. An instrument that experiences calibration drift can still measure the quantity of gas present but it cannot convert this information into an accurate numerical reading. Regular calibration with a certified standard gas concentration will update the instrument's reference point, ensuring that the instrument will produce continued, accurate readings.

Causes of Calibration Drift

Over time, the accuracy of gas detection instruments can diverge from their calibration settings in several ways:

- Gradual chemical degradation of sensors and drift in electronic components that occur naturally over time.
- **Chronic exposures to, and use in, extreme environmental conditions, such as high/low temperature and humidity, and high levels of airborne particulates.**
- Exposure to high (over-range) concentrations of the target gases and vapors.
- Chronic or acute exposure of catalytic hot-bead LEL sensors to poisons and inhibitors. These include: volatile silicones, hydride gases, halogenated hydrocarbons, and sulfide gases.
- Chronic or acute exposure of electrochemical toxic gas sensors to solvent vapors and highly corrosive gases.
- Harsh storage and operating conditions, such as when an instrument is dropped onto a hard surface or submerged in liquid. Normal handling/jostling of the equipment can create enough vibration or shock over time to affect electronic components & circuitry.

Often, after exposure to the more extreme conditions above, when calibration is attempted, the detector will either display a failure message or it will not allow the user to fully adjust the display reading. At this point, the severely damaged sensor must be replaced and/or the detector serviced by qualified personnel.

Worker Safety: The Number One Reason for Proper and Regular Calibration

The primary reason for proper, regular instrument calibration is to prevent inaccurate gas concentration readings that could lead to injury or to death. Correctly calibrating an instrument helps to ensure that the instrument will accurately respond to the gases that it is designed to detect, warning users of hazardous conditions before they reach dangerous levels. In addition to detecting and correcting for calibration drift, regular calibration assures the user that the instrument is functional. Gas detection instruments are often subjected to harsh operating and storage conditions where they can be damaged. Both of these factors can affect instrument performance, leading to inaccurate readings or even instrument failure. While a unit may appear to be sound during a visual inspection, it actually could be damaged internally. Regular calibration is the only way to be certain that a detector is fully functional. Moreover, a standing policy for regular calibration sets the tone for a safety-conscious work environment and indicates to workers that safety is a priority. As a result, workers may be more likely to keep safety principles in mind throughout the workday.

A written record of calibration should be kept for the life of each instrument. This record allows users to quickly identify an instrument that has a history of excessive maintenance/repair or is prone to erratic readings.

Bump Tests vs. Full Calibration

There are two methods of verifying instrument accuracy: a functional or bump test and a full calibration, each appropriate under certain conditions. A bump test verifies calibration by exposing the instrument to a known concentration of test gas. The instrument reading is compared to the actual quantity of gas present (as indicated on the cylinder). If the instrument's response is within an acceptable tolerance range of the actual concentration, then its calibration is verified. (Note: It is recommended that users check with the detection equipment manufacturer for the acceptable tolerance ranges.) Instruments should be "zeroed" before the bump test in order to give a more accurate picture of the bump test results. When performing a bump test, the test gas concentration should be high enough to trigger the instrument alarm.

If the bump test results are not within the acceptable range, a full calibration must be performed. A full calibration is the adjustment of the instrument's reading to coincide with a known concentration (generally a certified standard) of test gas. For verification of accuracy, calibration gas should always be certified by and traceable to the National Institute of Standards and Technology (NIST). In most cases, a full calibration is only necessary when an instrument fails a bump test or after it has been serviced. The full calibration and bump test should be conducted in a clean fresh air environment.

When to Bump Test and When to Calibrate

In the past, there often has been confusion regarding proper calibration procedures and frequency. To clarify this issue the International Safety Equipment Association (ISEA) issued a position statement on instrument calibration that states: **"A bump test or full calibration of direct-reading portable gas monitors should be made before each day's use in accordance with manufacturer's instructions, using an appropriate test gas." If the instrument fails a bump test, it must be adjusted through a full calibration before it is used.**

ISEA recommends more frequent testing if environmental conditions that could affect instrument performance are suspected, such as sensor poisons. The ISEA allows for less frequent calibration verification under certain conditions (see below), but the interval between testing should never exceed 30 days.

According to the ISEA, less frequent verification may be appropriate if the following criteria are met:

- During a period of initial use of at least 10 days in the intended atmosphere, calibration is verified daily to ensure there is nothing in the atmosphere to poison the sensor(s). The period of initial use must be of sufficient duration to ensure that the sensors are exposed to all conditions that might adversely affect the sensors.
- If the tests demonstrate that no adjustments are necessary, the interval between checks may be lengthened, but it should not exceed 30 days.
- When calibrating an instrument, always follow the instrument user's manual for the manufacturer's recommended calibration frequency and procedure.

Calibration Rules

The following are a few basic instrument calibration rules to ensure a clear path to health and safety.

- Follow the manufacturer's guidelines for proper calibration. No job, including instrument calibration, can be performed properly or safely without the right tools. The type and concentration of calibration gas, sample tubing, flow regulators and calibration adapters are key links in the calibration chain. Using equipment provided by the original manufacturer should ensure a proper start to every calibration.
- Only use certified calibration gas before its expiration date. The most important tool used in calibration is the gas itself. The instrument can only be as accurate as the gas used to calibrate it. Be certain your supplier can provide a traceable certificate of analysis for every calibration gas cylinder. The concentration of calibration gas particularly the concentration of reactive gases such as hydrogen sulfide or chlorine, will only remain stable for finite period of time. Never use calibration gas after its expiration date.
- **Train workers on the proper methods of calibration.** Most instruments are designed to be field calibrated with instructions detailed in user manuals, training videos or computer-based training modules.

Everyone responsible for performing instrument calibration should be trained and tested accordingly.

Conclusion

There is an inherent risk in many workplaces of injury or illness from respiratory hazards such as oxygen deficiency and the presence of toxic gases. Detection technology and products exist to minimize such risk. Properly verifying the accuracy of gas detection equipment before each day's use will help to ensure that each worker finishes the job safely.

For More Information Contact OSHA at:

www.osha.gov

On-Line Resources:

International Safety Equipment Association
1901 North Moore Street
Arlington, VA 22209-1762
(703) 525-1695
<http://www.osha.gov/dcsp/alliances/isea/isea.html>



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