

PC # 1871

Therriault, John

From: Food & Water Watch <act@fwwatch.org> on behalf of Patricia George <pgmg2@hotmail.com>
Sent: Wednesday, January 15, 2014 5:42 PM
To: Therriault, John
Subject: Public Comment Supporting R2012-023

Jan 15, 2014

Mr. James Therriault
100 W. Randolph St.
Chicago, IL 60601

Dear Mr. Therriault,

I'm writing in support of the rules outlined in R2012-023 and encourage the Illinois Pollution Control Board to maintain the stringent regulation of Concentrated Animal Feeding Operations.

Specific aspects of R2012-023 that must be preserved include the following:

--CAFOs lacking NPDES permits must provide the EPA with information establishing the 1) identity of their operator, 2) location, 3) number and type of livestock, 4) types of animal holding areas and 5) types and capacity of waste storage structures.

--Reducing the frequency of and tightening requirements surrounding winter application of livestock waste.

--Improving land application requirements to reduce the probability of waterway and groundwater contamination from livestock waste.

--Improving production area requirements to protect U.S. waters and institutionalize routine inspections for leaks, discharges and other problems.

--Tightening regulation of temporary manure stacks to prevent leaching into groundwater and runoff into waterways.

TO IMPROVE THESE RULES, the Pollution Control Board could insist on facility siting setbacks to increase distance from surface waters.

CAFOs dot the Illinois landscape and compromise the health of our environment and neighbors. I urge you to defend the advances achieved by these strong rules and to continue to strive for better environmental protections in the future.

Sincerely,

Patricia George

62294-2801

Therriault, John

PC#1872

From: Susan Turner <susant@sraproject.org>
Sent: Wednesday, January 15, 2014 5:16 PM
To: Therriault, John
Subject: Case # R2012-023

Case # R2012-023

Pollution Control Board

John Therriault, Assistant Clerk

James R. Thompson Center

100 W. Randolph Street, Suite 11-500

Chicago, IL 60601

Dear Illinois Pollution Control Board,

I would like the Illinois Pollution Control Board to know that I have appreciated their efforts and dedication during the hearings conducted these past years. Since the Board has chosen to adopt a number of the requirements we advocated for, I feel this process has been fruitful for both the board and the citizens who seek the protection of their environment.

- The enactment of a reporting rule for all unpermitted CAFOs.
- More stringent requirements for winter manure application.
- More stringent waste disposal standards for karst areas.
- Stronger requirements for temporary manure storage.

These "mutually agreed upon" requirements are vital to the protection of our aquifers so that all may have pure water sources.

Yes, these requirements are vital, but there is more work to be done to guarantee they will actually be upheld and enforced. The following regulations need to be adopted to prevent the dysfunction that can occur to the progress we have made with the above requirements.

- Require unpermitted CAFOs to submit information on their land application areas and their waste management plans under the reporting rule.
- Require all CAFOs to have to follow the same nutrient

PC#1873

Therriault, John

From: Food & Water Watch <act@fwwatch.org> on behalf of Mary Schusky <maryschusky@aol.com>
Sent: Wednesday, January 15, 2014 5:12 PM
To: Therriault, John
Subject: Public Comment Supporting R2012-023

Jan 15, 2014

Mr. James Therriault
100 W. Randolph St.
Chicago, IL 60601

Dear Mr. Therriault,

I'm writing in support of the rules outlined in R2012-023 and encourage the Illinois Pollution Control Board to maintain the stringent regulation of Concentrated Animal Feeding Operations.

Specific aspects of R2012-023 that must be preserved include the following:

--CAFOs lacking NPDES permits must provide the EPA with information establishing the 1) identity of their operator, 2) location, 3) number and type of livestock, 4) types of animal holding areas and 5) types and capacity of waste storage structures.

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--Improving land application requirements to reduce the probability of waterway and groundwater contamination from livestock waste.

--Improving production area requirements to protect U.S. waters and institutionalize routine inspections for leaks, discharges and other problems.

--Tightening regulation of temporary manure stacks to prevent leaching into groundwater and runoff into waterways.

TO IMPROVE THESE RULES, the Pollution Control Board could insist on facility siting setbacks to increase distance from surface waters.

CAFOs dot the Illinois landscape and compromise the health of our environment and neighbors. I urge you to defend the advances achieved by these strong rules and to continue to strive for better environmental protections in the future.

Sincerely,

Mary Schusky

62234-1958

management standards regardless of their permit status.

- Require CAFOs to identify the corporate integrators they contract with under the reporting rule and in permit applications.
- Increase the siting setbacks for new CAFOs from surface waters and drinking water supplies to prevent pollution.

A proactive approach is required to ensure that the quality of our air and water will provide the healthful environment everyone needs now and for future generations. Article 11, Sections 1&2 of the Illinois Constitution declares this.

Thank you for your attention.

Most sincerely,

Susan Turner

Founding member of:

Helping Others Maintain Environmental Standards

Illinois Citizens for Clean Air and Water

And

Assistant Regional Associate for the

Socially Responsible Agricultural Project

415 Park Avenue

Warren, IL. 61087

815-745-9013

Therriault, John

PC#1874

From: Kenneth Turner <kturner@d211.org>
Sent: Wednesday, January 15, 2014 9:35 AM
To: Therriault, John
Subject: case R2012-023,comment
Attachments: IPCB,R2012-023,comment.pdf

John Therriault, Assistant Clerk

January 15, 2014

Illinois Pollution Control Board

James R. Thompson Center

Chicago, IL 60601

RE: Case Number R2012-023

Dear Illinois Pollution Control Board,

My name is Ken Turner. I am a chemistry instructor at a university and a doctoral candidate. I am the father of five, a taxpayer, and an Illinois citizen.

I wish to begin by thanking you for your diligence in holding this period of public comment. It is refreshing to have an open and transparent discourse on a topic of such importance. Thank you for the many requirements that you are strengthening – to help protect the citizens, rural communities, and environment from the harm that is invariably attached to Confined Animal Feeding Operations, CAFO's. Still, I think there are additional areas that ought to be addressed. A citizen should not have to worry about their health and community due to lax regulations and enforcement. Citizens in Illinois have a Constitutional right to a healthful environment.

Most of the tighter regulations that I support are a matter of preserving transparency while holding *all* facilities to the standards that protect the public. So it is important that all CAFO's submit the land application information and follow the same nutrient management standards- regardless of their permit status. Otherwise, there is a double standard – no party should be given a “free pass” to pollute. In the same way, all corporate

interests and contractors should be required on all permits. In the absence of this information, the state is forced into reactionary enforcement actions to pollution that has already occurred. At that point, the damage to the environment, the rural community, and the health of citizens has already occurred. Illinois should be pro-active, not reactive in protecting the rights of its citizens.

A very important area to strengthen is the siting setbacks of CAFO's from surface water and drinking water. The current standards were adopted with no input from medical or hydro-geologic experts. The setbacks are entirely too small and unsafe. In many cases across the state, pollution from CAFO's has inevitably contaminated the nearby streams, waterways, and groundwater; affecting communities and even making people sick. New CAFO's and existing large CAFO's should be held to a standard that protects the citizens and communities where they exist.

Please act to protect the economies and communities of rural Illinois. Remember, the local economy actually suffers when CAFO's enter- proven by a study for the North Dakota Attorney General (Stofferahn, 2006, Industrialized Farming and Its Relationship to Community Well-Being). Real estate values plummet when CAFO's enter a community- as proven by a study in the Appraisal Journal. It is hard to build a community when the real -estate values decline by 50-90 % (Kilpatrick, 2001, Concentrated Animal Feeding Operations and Proximate Property Values). Finally, remember that there is no such thing as a zero discharge facility. In court documents and in several studies, the leakage rate of the untreated waste is typically 1,000 gallons per acre per day. Its amazing- 1,000 gallons of discharge per acre per day is considered "zero discharge". (There are several papers in agreement with this figure, including Seepage Losses from Animal Waste Lagoons: A Summary of a Four-Year Investigation in Kansas by J. M. Ham; 2002, American Society of Agricultural Engineers.) A proposed facility in NW Illinois proposed a leakage of 43,000 gallons of untreated waste per day- just 3 feet above the aquifer that serves thousands! (It produced a disastrous contaminated discharge before a single animal was on premises.)

Please continue in your selfless service to the people of Illinois. Consider the documented health and environmental risks that these CAFO's represent; and enact regulations that will ensure the safety and well-being of our citizens and rural communities. Just two days ago I saw a field with fresh manure spread on it- yes, in the middle of January! There is no agronomic rate for spreading manure in January. Regulation and enforcement are required.

Thank you for your timely efforts.

Sincerely,

Ken Turner

415 Park

Warren, IL 61087

Therriault, John

PCA#1875

From: Environment Illinois <action@environmentillinois.org> on behalf of Karen Bravo <ironmatron@comcast.net>
Sent: Wednesday, January 15, 2014 10:00 AM
To: Therriault, John
Subject: R2012-023

Jan 15, 2014

Illinois Pollution Control Board

Dear Pollution Control Board,

I am writing in support of the Illinois Pollution Control Board's proposed rule on factory farms.

Pollution from factory farms, like animal waste and chemicals, threatens the rivers and streams we love and depend on. That's why I fully support the IPCB's proposal to:

- Ban manure spreading practices that threaten our rivers, streams, or drinking water
- Ensure the public's right to know about every factory farm operation across the state, so we know where the pollution is coming from.

Much tougher action will be needed to truly curb factory farm pollution. But these are good first steps, and I hope that you will fully support them.

Thank you for standing up for Illinois's rivers and streams.

Sincerely,

Karen Bravo
108 Belle Plaine Ave.
Park Rdige, IL 60068-4916
(847) 823-6831