

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF: )  
 ) R12-23(A)  
CONCENTRATED ANIMAL FEEDING )  
OPERATIONS (CAFOs): PROPOSED ) (Rulemaking- Water)  
AMENDMENTS TO 35 ILL. ADM. CODE )  
PARTS 501, 502, AND 504 )

**NOTICE OF FILING**

PLEASE TAKE NOTICE that I have filed today with the Illinois Pollution Control Board ILLINOIS EPA'S RESPONSES TO BOARD QUESTIONS, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/Joanne M. Olson  
Joanne M. Olson  
Assistant Counsel  
Division of Legal Counsel

Date: December 3, 2014

1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
(217) 782-5544

THIS FILING IS SUBMITTED ELECTRONICALLY AND SERVED ON RECYCLED PAPER

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ILLINOIS EPA'S RESPONSES TO BOARD QUESTIONS

NOW COMES the Illinois Environmental Protection Agency, ("Illinois EPA" or "Agency") by and through its counsel, and hereby submits the Agency's responses to the Board's questions contained in its October 2, 2014, Order. The Agency's responses are attached hereto as Exhibit 1. Exhibit 1 contains Attachments A-W.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/Joanne M. Olson  
Joanne M. Olson  
Assistant Counsel  
Division of Legal Counsel

1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
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## ILLINOIS EPA'S RESPONSES TO BOARD QUESTIONS

- 1. Please submit a copy of any agreement(s) currently in effect under which the Agency is required to compile and maintain an inventory, database, or similar compilation of CAFOs that are not required to be covered by an NPDES permit.**

AGENCY RESPONSE: In March 2008, the Illinois Citizens for Clean Air and Water submitted a petition to the United States Environmental Protection Agency (U.S. EPA) for withdrawal of Illinois' federally delegated National Pollutant Discharge Elimination System (NPDES) program. See Attachment A. U.S. EPA conducted an investigation of the allegations and issued a report in September 2010. See Attachment B. In the report, U.S. EPA specified that Illinois EPA must develop and maintain a comprehensive inventory of CAFOs and evaluate their regulatory status. Attachment B at 3. In response, the Illinois EPA agreed to develop a list of CAFOs using available resources. See Attachment C.

On November 1, 2010 a Memorandum of Agreement (MOA) was signed between U.S. EPA and Illinois EPA. See Attachment D. The two agencies agreed to the oversight and improvement of performance in administrating the NPDES permitting and enforcement program. Under the MOA, U.S. EPA and Illinois EPA can share information on entities regulated under the NPDES program. In addition, the MOA provided that U.S. EPA and Illinois EPA will enter into a work plan and schedule to improve Illinois EPA's NPDES program.

On February 24, 2011, U.S. EPA and Illinois EPA entered into the first Illinois Program Work Plan Agreement. See Attachment E. This work plan spanned federal fiscal years 2011 and 2012. Illinois EPA agreed to develop a plan to create and maintain a comprehensive CAFO Inventory of Large CAFOs. Under the plan, Illinois EPA also agreed to seek commitments whereby the Illinois Department of Agriculture (IDOA) and Illinois Department of Public Health (IDPH) would routinely provide information about potential Large CAFOs to Illinois EPA. Attachment E at 7.

On February 4, 2013, U.S. EPA and Illinois EPA extended the 2011-2012 Work Plan Agreement until December 2013. See Attachment F. Under the second work plan, the Illinois EPA was required to submit the CAFO Inventory of all large and permitted CAFOs to U.S. EPA by February 28, 2103. Attachment F at 5. The Illinois EPA was also required to provide an update to the CAFO Inventory by September 30, 2013. This work plan required Illinois EPA to have a process in place to get regular updates about potential Large CAFOs from the IDOA and IDPH. Id. The inventory must include all confirmed Large and permitted CAFO sites identified by Illinois EPA's regional offices, permit applications, citizen tips and complaints, U.S. EPA, the IDOA, IDPH and Illinois Emergency Management Agency. Id. Illinois EPA fulfilled its obligations under the 2013 Work Plan Agreement. In October 2013, Illinois EPA submitted the attached CAFO Inventory to U.S. EPA. See Attachment G.

On September 5, 2014, U.S. EPA and Illinois EPA replaced the previous work plan with the Illinois Program Work Plan 2014-2016. See Attachment H. This work plan specifically refers to compiling and maintaining an inventory of large CAFOs. Attachment H at 5, paragraphs 10, 11. Illinois EPA is required to update and submit to U.S. EPA its Large CAFO inventory by August 31 and February 28 of each year. The CAFO Inventory must include all confirmed Large and permitted CAFOs. On November 24, 2014, the Illinois EPA submitted an updated CAFO Inventory to U.S. EPA. See Attachment I.

**2. Please submit any Agency regulations, guidance, policy, or other means through which the Agency implements any agreement(s) described in Question 1.**

AGENCY RESPONSE: Under the Illinois Work Plan 2014-2016, the Illinois EPA was required to submit a plan to maintain the CAFO Inventory to U.S. EPA by October 31, 2014. Illinois EPA submitted the following documents:

- 1) Agricultural Program Inspection Strategy, August 2014. See Attachment J.
- 2) The Standard Operating Procedure for Updating the CAFO Inventory, October 2014. See Attachment K.
- 3) CAFO/AFO Information from the Illinois Department of Agriculture and the Illinois Department of Public Health. See Attachment L.

Illinois EPA has also developed a standard operating procedure for the periodic review of AFO/CAFO information provided by IDOA and IDPH. See Attachment M.

**3. JCAR describes information collected under an agreement between the Agency and USEPA with the assistance of the Illinois Departments of Agriculture and Public Health. Please, for each department, list the items of information, including animal types and number of animals, supplied to the Agency, how each department collects each item of information, what period of time is covered by each item of information, how frequently each department submits information to the Agency.**

AGENCY RESPONSE: The Agency's process of gathering information from IDOA and IDPH are described below.

Illinois Department of Agriculture (IDOA) – An interagency agreement exists between Illinois EPA and IDOA for the sharing of information concerning livestock facilities. See Attachment N. Weekly, IDOA submits hard copies of the following Livestock Management Facilities Act (LMFA) documents to the Agency:

- 1) Notice of Intent to Construct Applications. See Attachment O.
- 2) Initial Notice of Construction Completeness. See Attachment P.

- 3) Final Notice of Construction Completeness. See Attachment Q.
- 4) Acknowledgement of Setback Compliance. See Attachment R.

From these documents, the Agency inputs the information in a Microsoft Access database program (IDOA Access Database) which is accessible through the Agency's internal network system for review by field staff. Screenshots of the Illinois EPA's IDOA Access Database input fields are attached. See Attachment S.

The IDOA Access Database program allows users to query received LMFA facility construction data. This facility data includes the following fields:

Date Issued	Facility Telephone
Information Source	Facility Cell Phone
Quarter-Quarter Section	Owner Address
Quarter Section	Owner City
Section	Owner State
Township	Owner Zip Code
Range	Owner Telephone
Principal Meridian	Owner Cell Phone
County Name	Species
Facility Mailing Address	Project Animal Units
Facility Name	Total Site Animal Units
Facility Address	Nearest Town
Facility City	Region
Facility State	Input Date
Facility Zip Code	

The IDOA Access Database program also allows users to access Initial Notice of Construction Completeness information, including:

Date Issued	Input Date
Facility Identification Number	Waste Storage Structure Max Lengths
Project Description	Waste Storage Structure Max Width
Comments	Waste Storage Structure Max Depths
Region	Waste Storage Structure Max Capacities
Information Source	

The IDOA Access Database program allows users to access Final Notice of Construction Completeness information, including:

Date Issued	Information From
Facility Id Number	County Name
Date Inspected	Region
Comments	Input Date

Finally, the IDOA Access Database program allows the user to access Acknowledgement of Setback Compliance information, including:

Date Issued	Owner Zip Code
Facility Identification Number	Owner Telephone
Quarter-Quarter Section	Owner Cell Phone
Quarter Section	New/Expanded Facility
Section	Species
Township	Project Animal Units
Range	Total Animal Units
Principal Meridian	Proposed Livestock Management Facility Type
County Name	Proposed Facility Type
Facility Mailing Address	Waste Storage Structure Maximum Lengths
Facility Name	Waste Storage Structure Maximum Widths
Facility Address	Waste Storage Structure Maximum Depths
Facility City	Waste Storage Structure Maximum Capacities
Facility State	Nearest Town Distance,
Facility Zip Code	Nearest Residence Distance
Facility Telephone	Nearest Occupied Residence Distance
Facility Cell Phone	Nearest Non-Farm Business Distance
Owner Address	Nearest Place of Assembly
Owner City	Input Date
Owner State	

Illinois Department of Public Health (IDPH) - IDPH sends the Agency an Excel spreadsheet containing a list of operating dairies on an semi-annual schedule. Attached is an example of the information received from IDPH. See Attachment T. The information within the spreadsheets is obtained through routine field inspections by IDPH's Office of Health Protection, Food, Drugs and Dairy Division staff. The shared information includes the following fields:

Name	Billing Address
Entity Type	Geographic Region
County	Phone
Address	Latitude
Mailing County	Longitude
Mailing Address	Receiver State ID Number

The shared information is then imported into a Microsoft Access database program (IDPH Access Database) and compared with existing, known dairy facilities. Any additions or deletions are identified, extracted, and exported into an Excel spreadsheet for the field staff to review.

4. **Please identify any other sources used to collect information on unpermitted CAFOs. Please identify sources both inside and outside of the Agency.**

AGENCY RESPONSE: The information concerning unpermitted CAFOs can also be obtained through the following:

- Citizen Complaints and/or Inquiries
- Facility Contacts
- DWPC/FOS Inspection Reports
- DWPC/NPDES Permit files (CAFO Applications and Stormwater NOIs)
- DWPC/Surface Water Section Stream Surveys
- Illinois Emergency Management Agency and National Response Center Incident Reports

Illinois EPA has developed an inspection check list that contains information that will be included in the CAFO Database. See Attachment U.

5. **Please describe the process the Agency uses to compile information identified in response to Questions 3 and 4. Specifically, please identify the software used for each dataset identified as well as the database software used by the Agency to compile the identified information. Also, please comment on whether the Agency's database administrator can be granted read-only access to the databases of other departments identified in response to Questions 3 and 4.**

AGENCY RESPONSE: The Agency compiles information into a CAFO Database and then into a CAFO Inventory.

CAFO Database:

The CAFO Database was developed by combining the Agency's historical data from the "Livestock Facility Investigation Annual Report" database (1988 – 2011) with data from IDOA and data from the IDPH. See Agency Response to Question 3 above. When these three sources were combined, the raw data yielded a data set of approximately 4300 facilities, which included agricultural related complaints. The Agency reviewed the data and removed duplicate facilities and facilities known not to be in operation.

The CAFO Database currently has 1338 facilities, and 266 of these facilities are CAFOs (254 Large CAFOs, 10 Medium CAFOs, and 2 Small CAFOs). The remaining facilities in the CAFO Database are not CAFOs.

Additions to the CAFO Database occur after an Agency inspection of a livestock facility. See Agency Response to Questions #3 - 4. Information obtained through IDOA, IDPH and the other numerous sources set forth in the Agency Response to Question #4 is reviewed by Illinois EPA field staff to insure the information is not duplicative and to establish inspection priorities. As staffing and priorities allow, field verification/inspections are performed. See Attachment K and Attachment M.

The CAFO Database is compiled using Microsoft Access software. The fields in the CAFO Database and an explanation of how they are populated are attached. See Attachment V.

CAFO Inventory:

The current CAFO Inventory has 266 facilities, which includes permitted Large CAFOs, unpermitted Large CAFOs, permitted Medium CAFOs and permitted small CAFOs. The inventory is used by Agency staff to schedule and conduct inspections required under the 2014-2016 Work Plan. This is the CAFO Inventory that Illinois EPA submits to USEPA semiannually on August 31<sup>st</sup> and February 28<sup>th</sup> each year.

The CAFO Inventory data is maintained in an Access database. Agency staff may be granted read-only access to the CAFO Inventory upon request. The CAFO Inventory database fields include:

BOW ID	Expiration Date
Facility Name	Facility Size (L,M,S)
NPDES Permit No.	Animal Type
Issue Date	County

- Please provide a copy of any inventory, database or similar compilation of CAFOs that are not required to be covered by an NPDES permit that is maintained by the Agency. Please comment on whether this information is available to the public through the Agency's website or other medium. Also, please provide language requiring public availability of this information that the Board can consider if it proceeds to first notice.**

AGENCY RESPONSE: The 2013 CAFO Inventory and the 2014 CAFO Inventory are attached. See Attachment G and Attachment I. The CAFO Inventory is available to the public through the Illinois Freedom of Information Act (FOIA), 5 ILCS 140. The Agency's corresponding rules (Access to Public Records of the Illinois Environmental Protection Agency, 2 Ill. Adm. Code 1828) provide the framework by which Illinois EPA's public records may be requested, accessed, inspected, and duplicated.

The CAFO Database has over 100 fields, many of which are beyond the information requirements of proposed Section 501.505. Therefore, the Agency now attaches a report from the database for those fields contained in proposed Section 501.505. See Attachment W.<sup>1</sup>

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<sup>1</sup>On November 26, 2014, the Agricultural Coalition filed its Application for Non-Disclosure. Specifically, the Agricultural Coalition requests that the following information not be disclosed: (1) livestock facility location information: facility address, latitude and longitude; (2) livestock facility owner information: address and phone number; (3) waste and wastewater storage information: containment type, wastewater storage type and total storage volume. In light of the Agricultural Coalition's Application for Non-Disclosure, and pursuant to 35 Ill. Adm. Code 130.406, the Agency has redacted the information identified above from Attachment P, Attachment Q, Attachment R, Attachment T, and Attachment W. The Illinois EPA now submits these redacted Attachments to the Board, as well as to the members of the service list.

7. **Please address any differences between any information compiled by the Agency as described in Questions 3 through 6 and the requirements of Section 501.505 as proposed by the Board at Second Notice.**

AGENCY RESPONSE: The Board's proposed Section 501.505(c) requires the following information be submitted to the Agency by the CAFO owner:

- 1) Name of all owners and operators of the facility and their mailing addresses and phone numbers.
  - o The Agency currently collects this information through IDOA, IDPH and field inspections. See Agency Response to Board Question #4.
- 2) The location of the facility identified by the street address or latitude and longitude.
  - o The Agency currently collects this information through IDOA, IDPH and field inspections. See Agency Response to Board Question #4. The Notice of Intent to Construct application form, submitted to Illinois EPA from IDOA, contains the facility address. See Attachment O. The information provided by IDPH includes latitude and longitude. See Attachment T. The Agency also collects this information on its Livestock Facility Inspection Checklist. See Attachment U.
- 3) The location of the facility according to township, county, section and quarter section.
  - o The Agency currently obtains this information from the Notice of Intent to Construct application form, submitted to Illinois EPA from IDOA. See Attachment O. Illinois EPA also collects this information on its Livestock Facility Inspection Checklist. See Attachment U.
- 4) For the previous 12 months, identification of each animal type stabled or confined at the facility and the maximum number of each animal type.
  - o The Agency currently collects information on the types of animals confined or stabled. The Illinois EPA has included the facility's maximum design capacity as a field in the CAFO Database and plans to populate this field based on information gained from CAFO inspections and the CAFO inspection checklist. See Attachment U. Additionally, the maximum design capacity in animal units is included on the IDOA's Notice of Intent to Construct application form, which is provided to the Illinois EPA. See Attachment O.

- 5) Identification of animal holding areas including pastures, confinement barns and open lots.
    - o The Agency currently collects this information during inspections at livestock management facilities. The information collected by inspectors includes the current number and type of animals in each confinement structure; number, type, and capacity of confinement structures including the total confinement buildings, open confinement buildings, freestall barns, open earthen feedlots, open concrete feedlots, vegetative pastures, etc.
  - 6) Identification of types and capacities of livestock waste containment and storage units, including but not limited to, anaerobic lagoons, manure stacks, underground storage pits, and storage tanks;
    - o The Agency currently collects this information during inspections at livestock facilities. See Attachment U at 4-5. Additionally, the Notice of Intent to Construct application form submitted to the Agency by IDOA includes this information. Attachment O at 3.
  - 7) The date the information in subsection (c) is submitted to the Agency.
    - o The CAFO Database contains a field entitled "Input Date."
8. **In its June 26, 2014 letter to the Board, JCAR stated that the information required under the Board's proposed Section 501.505 is already collected by the Agency, with one difference regarding location. JCAR reported that the Agency collected information about a facility's location in terms of latitude and longitude only, because it is the most specific locator. Please comment on whether the Agency continues to consider longitude and latitude as more specific than other information, and propose language requesting location information that the Board can consider if it proceeds to first notice.**

AGENCY RESPONSE: The Illinois EPA agrees that latitude and longitude provide more specific location than township, county, section and quarter section; however, for inspection purposes, both sources provide the required location for a livestock facility. Additionally, the township, county, section and quarter section are included on the IDOA's Notice of Intent to Construct application form, and this document is provided to the Illinois EPA. See Attachment O.

Should the Board elect to proceed to first notice on a CAFO registration requirement, the proposed language in Section 501.505(c)(2) is unnecessary.

9. **In its June 26, 2014 letter to the Board, JCAR stated that the information required under the Board's proposed Section 501.505 is already collected by the Agency, with one difference regarding animal types and numbers. JCAR reported that the Agency maintains information on facilities' animal type and maximum number of each animal type based on a facility's most recent permit application of other recent data submitted to the Department of Agriculture or the Department of Public Health. Please comment on how frequently the Agency receives these permit applications and other data from the departments, and propose language on animal type and maximum number of each animal type that the Board can consider if it proceeds to first notice.**

AGENCY RESPONSE: Regarding the frequency of information from IDOA and the IDPH, please refer to the Agency Response to Question # 3.

Should the Board elect to proceed to first notice, the Agency would propose that the requirement in proposed Section 501.505(c)(4) be divided into two subsections; the first subsection should require the CAFO owner to identify the number and animal type of any animal stabled or confined at the facility within the last 12 months; and the second subsection should require the CAFO owner to specify the maximum design capacity of the facility.

10. **For any information submitted as described in Questions 3 through 6, please describe how the Agency addresses any changes in information, e.g., change in ownership or change in type of animal stabled or confined at the facility.**

AGENCY RESPONSE: Following an inspection, the Agency's field staff will propose the addition, deletion, or amendment of information for a specific livestock facility to the CAFO Database. Following receipt of the inspection report, the Illinois EPA conducts an independent assessment from the assessment of the field staff. If confirmed, assigned Illinois EPA staff will modify the CAFO Database as appropriate. Modifications to the CAFO Database may result in modifications to the CAFO Inventory.

11. **For any information submitted as described in Question 3 through 6, please describe how the Agency addresses any facility that ceases operation.**

AGENCY RESPONSE: Please see the Agency's response to Question 10 above.

12. **If USEPA has issued any response, finding, or other determination regarding information as described in Question 3 through 6, please provide a copy to the Board.**

AGENCY RESPONSE: In the 2014–2016 Work Plan, U.S. EPA acknowledges Illinois EPA's CAFO Inventory: "Since February 2011, Illinois EPA. . . has developed an inventory of Large CAFOs." Attachment H at 3. Further, under the work plan, Illinois EPA must develop and submit for approval a draft plan on how the Agency will update the CAFO Inventory based on information received from IDPH and IDOA. Attachment

H at 4. See Agency Response to Question #2. U.S. EPA will review the plan, submit its comments, and Illinois EPA must submit a final plan. Attachment H at 4.

13. **Please explain how the Agency intends to comply with federal regulations requiring Illinois to maintain a program “capable of making comprehensive surveys of all facilities and activities subject to the [Agency’s] authority to identify persons subject to regulation who have failed to comply with permit application or other program requirements.” 40 C.F.R. 123.26(b)(1).**

AGENCY RESPONSE: Since 2011, Illinois EPA has been in compliance with the requirements of 40 C.F.R. §123.26(b)(1). Part 123 of U.S. EPA's regulations outline the procedures U.S. EPA follows in approving, revising, and withdrawing federal delegation of the NPDES permitting program to the states and the requirements state programs must meet to be approved by the Administrator. 40 C.F.R. §123.1(a).

Under §123.26, U.S. EPA requires states with a delegated NPDES program to collect information to evaluate compliance or noncompliance of regulated facilities. 40 C.F.R. §123.26. Site specific inspections of these facilities is one way to verify the accuracy of the information, investigate potential violations, and determine if regulated facilities are complying with the Clean Water Act. In addition to these inspections, states also must undertake “comprehensive surveys of all facilities and activities” regulated by the Clean Water Act. 40 C.F.R. §123.26(b)(1). Further, under Part 123, U.S. EPA can investigate claims that states are not adequately following these regulations, and has the authority to create work plans with states to facilitate the implementation of an NPDES program, including the creation of these comprehensive surveys or inventory.

In September 2010, U.S. EPA, Region 5, did exactly that. In a response to a 2008 petition for withdrawal of Illinois’ NPDES program, U.S. EPA, Region 5, conducted an investigation from December 2008 to September 2009. See Attachment B at 3. U.S. EPA provided its initial findings of this investigation to Illinois EPA in September 2010. Id. In this report, U.S. EPA, Region 5, found that Illinois’ CAFO NPDES program failed to meet minimum thresholds for an adequate CAFO program. The report discussed EPA’s initial findings as well as the actions Illinois EPA must take to comply with Clean Water Act requirements for delegated state NPDES programs. It states, in relevant part, that Illinois EPA must:

- Develop and maintain a comprehensive inventory of CAFOs and evaluate their regulatory status; and
- Revise its inspection process for livestock and poultry facilities to enable the Agency to determine and track whether inspected facilities are CAFOs required to have NPDES permits, and whether they are in compliance with NPDES requirements.

Id. at 3-4. In this report, U.S. EPA, Region 5, concluded that “Illinois does not maintain a program capable of making a comprehensive survey of CAFOs subject to NPDES permit requirements.” Id. at 3. Under the required actions, U.S. EPA, Region 5,

mandated that "Illinois EPA must conduct and maintain a comprehensive survey of livestock facilities." Id. at 36.

U.S. EPA, Region 5, recommended that "to identify new or expanded livestock operations as CAFOs that are subject to permit application requirements, Illinois EPA should establish procedures, in accordance with IDA [Department of Agriculture] and other agencies as appropriate, to review plans for new and expanded livestock facilities." Id.

In response to these findings, Illinois EPA entered into an MOA to address U.S. EPA Region 5's concerns regarding the CAFO NPDES program. See Attachment D. Since 2011, Illinois EPA and U.S. EPA Region 5 have entered into three separate CAFO Work Plans. The most recent CAFO Work Plan was entered into on September 5, 2014. See Attachment H. In this work plan, to satisfy the requirements of 40 C.F.R. §123.26(b)(1), Illinois EPA is required to satisfy two distinct items on CAFO inventory:

- Illinois EPA is to update and submit its Large CAFO inventory by August 31 and February 28 of each year. By these same dates, Illinois EPA will ensure that the updated inventory is available to all Illinois EPA staff and the public in an easily accessible format. The inventory will include all confirmed Large and permitted CAFO sites identified by Illinois EPA based on information in permit applications, citizen tips and complaints, U.S. EPA, the Illinois Department of Agriculture, and the Illinois Department of Public Health. Id. at 4.
- By October 31, 2014, Region 5 requires Illinois EPA to submit a plan to maintain the inventory. The plan must specify how Illinois EPA will maintain the inventory including a process confirming sizes and whether discharges are occurring at unpermitted large and medium livestock facilities and documenting the determinations. The plan must also include the process to get updates from the IDOA and IDPH. Illinois EPA submitted this plan. See Agency Response to Question #2. Within 60 days of receipt of U.S. EPA's review of Illinois EPA's plan, Illinois EPA will submit a final plan. Id.

The Agency believes that as long as it complies with the specific inventory related mandates of the 2014-2016 Work Plan, it is in compliance with U.S. EPA's regulations at 40 C.F.R. §123.26(b)(1). For information regarding the on-going compilation of the CAFO inventory, periodic update of the inventory information, and the Agency's protocols to maintain this inventory, please see Agency Responses to Questions#1-7.

**14. How many Large CAFOs currently operate in Illinois?**

AGENCY RESPONSE: Currently, Illinois EPA has identified 254 large CAFOs in its inventory. Large CAFOs will continue to be added to the inventory through the processes identified in Questions #3-6 and upon verification by field staff.

**15. How many Large CAFOS in Illinois are currently covered by an NPDES permit?**

AGENCY RESPONSE: Currently, there are 27 Large permitted CAFOs in Illinois.

**Attachment List**

- Attachment A: 2008 Petition for the Withdrawal of the NPDES Program Delegation from the State of Illinois
- Attachment B: U.S. EPA's Initial Results of an Informal Investigation of the NPDES program for CAFOs in the State of Illinois.
- Attachment C: Illinois EPA's Response to USEPA Informal Investigation
- Attachment D: November 1, 2010 Memorandum of Agreement Between US EPA and IEPA
- Attachment E: Illinois Program Work Plan, 2011-2012
- Attachment F: Illinois Program Work Plan 2013
- Attachment G: October 2013 Illinois EPA CAFO Inventory
- Attachment H: Illinois Program Work Plan 2014-2016
- Attachment I: November 2014 CAFO Inventory
- Attachment J: Agricultural Program Inspection Strategy, August 2014
- Attachment K: The Standard Operating Procedure for Updating the CAFO Inventory, October 2014
- Attachment L: CAFO/AFO Information from the Illinois Department of Agriculture and the Illinois Department of Public Health
- Attachment M: SOP: Review of AFO/CAFO information provided by the IDOA/IDPH
- Attachment N: Interagency Agreement between Illinois EPA and IDOA
- Attachment O: Notice of Intent to Construct Applications.
- Attachment P: Initial Notice of Construction Completeness
- Attachment Q: Final Notice of Construction Completeness
- Attachment R: Acknowledgement of Setback Compliance
- Attachment S: IDOA Access Database Input Screenshots
- Attachment T: Portion of IDPH Excel spreadsheet

Attachment U: Illinois EPA Inspection Checklist

Attachment V: CAFO Database Fields

Attachment W: Proposed 501.505 fields within the CAFO Database

**CERTIFICATE OF SERVICE**

Joanne M. Olson, Assistant Counsel for the Illinois EPA, herein certifies that she has served a copy of the foregoing NOTICE OF FILING and ILLINOIS EPA'S RESPONSES TO BOARD QUESTIONS upon persons listed on the Service List by mailing, unless otherwise noted on the Service List, a true copy thereof in an envelope duly addressed bearing proper first class postage and deposited in the United States mail at Springfield, Illinois on December 3, 2014.

By:     /s/Joanne M. Olson    

**THIS FILING IS SUBMITTED ELECTRONICALLY AND SERVED ON RECYCLED PAPER**

SERVICE LIST

Matthew J. Dunn, Chief  
Environmental Enforcement/Asbestos  
Litigation Division  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, IL 62706

Jeff Smith  
General Counsel  
Illinois Department of Natural Resources  
One Natural Resources Way  
Springfield, IL 62702-1271

Tim Fox  
Illinois Pollution Control Board  
James R. Thompson Center  
100 W. Randolph  
Suite 11-500  
Chicago, Illinois 60601

Raymond Watson  
General Counsel  
Illinois Department of Agriculture  
P.O. Box 19281  
801 East Sangamon Avenue  
Springfield, IL 62794-9281

Warren Goetsch  
Illinois Department of Agriculture  
P.O. Box 19281  
801 East Sangamon Avenue  
Springfield, IL 62794-9281

Illinois Department of Public Health  
General Counsel  
535 West Jefferson  
Springfield, IL 62761

Illinois State University  
Campus Box 5020  
Normal, IL 61790-5020

Alec Messina  
Illinois Environmental Regulatory Group  
215 East Adams Street  
Springfield, IL 62701

Jeff Keiser  
Director of Engineering  
Illinois American Water Company  
100 North Water Works Drive  
Belleville, IL 62223

Marvin Traylor  
Executive Director  
Illinois Association of Wastewater Agencies  
241 North Fifth Street  
Springfield, IL 62701

Stephanie R. Hammer  
Brown, Hay & Stephens, L.L.P.  
700 First Mercantile Bank Building  
205 South Fifth Street  
P.O. Box 2459  
Springfield, IL 62705-2459

Claire A. Manning  
Brown, Hay & Stephens, L.L.P.  
700 First Mercantile Bank Building  
205 South Fifth Street  
P.O. Box 2459  
Springfield, IL 62705-2459

Illinois Beef Association  
2060 West Iles Ave  
Suite B  
Springfield, IL 62704

Tim Maiers  
Director of Industry & Public Relations  
Illinois Pork Producers Associate  
6411 S. Sixth Street Frontage Rd. East  
Springfield, IL 62707

Jim Kaitschuck  
Executive Director  
Illinois Pork Producers Associate  
6411 S. Sixth Street Frontage Rd. East  
Springfield, IL 62707

University of Illinois Extension  
332 E. Ag. Eng. Science Building  
1304 W. Pennsylvania Ave  
MC-644  
Urbana, IL 61801

Jim Fraley  
Illinois Livestock Development Group  
1701 N. Towanda Ave  
P.O. Box 2901  
Bloomington, IL 61702-2901

Jim Fraley  
Illinois Milk Producers Association  
1701 N. Towanda Ave  
Bloomington, IL 61701

Karen Hudson  
Families Against Rural Messes, Inc.  
22514 West Claybaugh Rd  
Elmwood, IL 61529-9457

Albert Ettinger  
53 W. Jackson  
Suite 1664  
Chicago, IL 60604

Jack Darin  
Sierra Club  
70 East Lake Street  
Suite 1500  
Chicago, IL 60601-7447

Stacy James  
Prairie Rivers Network  
1902 Fox Drive  
Suite G  
Champaign, IL 61820

Danielle Diamond  
Illinois Citizens for Clean Air and Water  
3431 W. Elm Street  
McHenry, IL 60050

Kendall Thu  
Illinois Citizens for Clean Air and Water  
609 Parkside Drive  
Sycamore, IL 60178

I. Ronald Lawfer  
14123 Burr Oak  
Stockton, IL 61085

Ann Alexander  
Senior Attorney, Midwest Program  
Natural Resources Defense Council  
2 N. Riverside Plaza, Suite 2250  
Chicago, IL 60606

**Electronic Service Per Agreement:**

Jane E. McBride  
Assistant Attorney General  
Illinois Attorney General's Office  
500 South Second Street  
Springfield, IL 62706

William D. Ingersoll  
Brown, Hay & Stephens, L.L.P.  
700 First Mercantile Bank Building  
205 South Fifth Street  
P.O. Box 2459  
Springfield, IL 62705-2459

Laurie Ann Dougherty  
Executive Director  
Illinois Section of American Water Works  
545 South Randall Road  
St. Charles, IL 60174  
(email Sandi McGinnis)

Kim Knowles  
Prairie Rivers Network  
1902 Fox Drive  
Suite G  
Champaign, IL 61820

Ted L. Funk  
Agricultural Engineer  
Funkioneering  
1808 Lyndhurst Drive  
Savoy, IL 61874

Lindsay Record  
Executive Director  
Illinois Stewardship Alliance  
401 W. Jackson Parkway  
Springfield, IL 62704

Esther Liberman  
League of Women Voters of Jo Davies County  
Interested Party  
815 Clinton Street  
Galena, IL 61036

Brian J. Sauder  
Central Illinois Outreach & Policy Coordinator  
1001 South Wright Street Room 7  
Champaign, IL 61802

Lauren C. Lurkins  
Illinois Farm Bureau  
1701 N. Towanda Avenue  
Bloomington, Illinois 61701-2050

Arnie Leder  
1022 N. 40th Road  
Mendota, IL 61342

Jessica Dexter  
Staff Attorney  
Environmental Law and Policy Center  
35 East Wacker Drive, Ste. 1300  
Chicago, IL 60601