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STATE OF ILLINOIS
Pollution Control Board

May 11, 2001

Dorothy M. Gunn
Pollution Control Board
James R. Thompson Center
100 W. Randolph, Suite 11-500
Chicago, IL 60601-03286

R01-28
P.C. # 4

Dear Board Members,

Thank you for the opportunity to address the Board regarding new rule changes toward the building standards for livestock facilities. I realize you have a difficult job in weighing all the different suggestions that have been proposed. As in all cases, a common sense approach always seems to prevail. Let me express my appreciation for your thoughtful deliberations.

I will address those items that I testified to, as well as some of the information that you had asked me to provide.

- 1) Regarding the requirement for a construction joint and waterstop every 50' of concrete. In my opinion this adds cost to a project and makes for a poorer finished project. We are going to have more human error in this requirement while a continuous pour would be cheaper and a much better and safer concrete surface. This change would have less likelihood of a broken seal and leakage. I would ask, where is the evidence that shows this is necessary? I think this is just evidence that the MPS booklet is outdated in many recommendations.
- 2) As for drainage around a farmstead. I think this is unfair. Are we going to require that all small Towns and Municipalities are going to provide the same? There is no evidence that effluent is contaminating ground water. If there is a concern with some waste facility, monitoring wells can detect any problems. Many drainage outlets in Illinois are on relatively flat ground which would require a lift station for the drainage to be put in a holding lagoon. This would be very expensive and most small to medium livestock farms would discontinue operation rather than spend that money. This would be an unsubstantiated assumption without any evidence that it is needed.
- 3) There was a proposal to extend the minimum 4" thick concrete surface to a minimum of 5". As I asked at the hearing and your first concern should be, WHY? Is there evidence that we have a problem now? What is the impact going to be on producers if this is enacted.

I must admit that our new operation will be a bit larger than most construction projects; however, most cannot afford this additional expense.

In our project, we estimate 464 yards of concrete in each facility at the 4" requirement. If we are to add 1" to the standard on each of the three, buildings on 5" floors this would add approximately 116 yards per building or 348 yards total. At an estimated price of \$60.00 per yard of concrete and \$80 per yard for labor on installation, we have added \$48,720.00 to the cost of our project.

If we add in the cost requirement of Illinois that we need a 10" wall in our deep pit construction rather than on 8" wall as in other states, we have already added 100 yards per barn times the two deep pits, which equals 200 yards at the \$140 estimated construction costs or a total additional cost to us of \$28,000.00. Add these two requirements and we will have to spend \$76,000.00 in Illinois for a deep pit construction over what we can do in other neighboring states.

Seems to me, if your board agrees that a deep pit structure for holding effluent is safer and more environmentally friendly over the lagoon system, we should not be adding unnecessary costs. As I stated in my testimony, lagoon systems have been engineered to be safe and desirable. However, the concrete pit system is safer. Your current rules and certainly these new additions will only encourage the lagoon system, because of economical factors. As I testified, we will spend approximately \$50,000.00 to \$100,000.00 more on our project for a deep pit system over a lagoon system. These additional costs will only push us to the lower costs system or look to other states to expand. I would encourage that this new standard not be adapted and that someone look at the MPS plan service to find other construction requirements that are outdated and unnecessary.

In closing I would hope that you would keep these two ideas alive as you decide new standards. First, Illinois has new livestock facility requirements, many too strict in my opinion. Where is the evidence that stricter requirements are needed? Some say that we do not have studies on old confinement systems. These systems are forty years old, in every county in the state, and there are no problems with them. We have proved that they are safe because there are no reports of problems. There will only be isolated problems if any, because the design of concrete filled with manure, which is an excellent structure sealer on its own, is the safest design for containment.

Secondly, please ask for a study to look at the MPS Plan Service booklet that was published over thirty years ago. These should be minimum standards not excessive requirements. Please remember most projects, have hired a licensed engineer. Their expertise should be honored when approving a project, not general requirements from a booklet three decades old. I would think some weight should be given to an Engineering Firms study of approval.

Once again, I thank you for your diligence and considerations in keeping Illinois safe and yet workable. If I can help in any other regard, please feel free to contact me.

Sincerely,



Scheetz Family Farms
James R. Scheetz, Manager