

From: [Case Vander Meulen](#)
To: [Jennings, Jonathan \(ECY\); WSDF@msn.com](#)
Subject: Comments on CAFO permit draft.
Date: Thursday, September 17, 2015 5:30:10 PM
Attachments: [image002.png](#)

Dear Mr. Jon Jennings.

This email is in response to the DOE's 1st draft of the new CAFO permit.

I want you to know my severe frustration level from the language of this draft.

First I want to tell you a little about myself and my operation. Our facility is in North Franklin county so in Eastern Washington. We started building this facility in the summer of 2007 and started operating in the spring of 2008.

The whole facility was build brand new and state of the art with all the proper permits in place and according to and with the help of NRCS. We build the place as a **Zero discharge** facility and went above and beyond, this included geomembrane liners in all the lagoons. We spend hundreds of thousands of dollars to make sure we build it right the first time and according to NRCS standards and beyond.

Now in this draft that doesn't seem to be good enough and DOE states that all lagoons leak including the ones with geomembrane liners and therefore we would be discharging. Therefore we would have to have a discharge permit. This is absurd and this would cost me hundreds of thousands dollars more in: 1. Installing double liners with a leak detection system. 2. Having to sample all our application field to 3 feet deep. 3. Having to reengineer all of our manure management facilities and probably having to change things and having to go through all of this states bureaucracy. These are just a few things that I can think of as I understand them but I am sure there are many many more.

I attended one of the workshops that the two gentlemen from DOE held(I can't remember their names). They seem to be very practical and make it sound like it is no big deal. The language in this draft is very different however and therefore I feel very misled by DOE personnel.

But the real question is, is this going to make a difference in the final outcome? Is this the best place to spend all these resources? I think not!! This is going to kill the dairy and livestock industries in this state, I assume after reading this draft that is what DOE is after. It just seems a big coincidence that this is coming out after Cow palace settlement. The door is open so let's go after them, I'm convinced of it.

If DOE is really after protecting our resources and looking out for the best interest of the citizens of this state (including livestock producers), then let's use sound science and research before instituting new regulations that are going to choke those citizens that are creating billions of dollars of revenue and thousands of jobs.

Sincerely



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