

From: [Tabitha Dixon](#)
To: [Jennings, Jonathan \(ECY\); WSDF@msn.com](#)
Subject: Cafo Permit Comments
Date: Wednesday, September 23, 2015 11:49:33 AM
Attachments: [Cafo Permit Comments.docx](#)

Good Afternoon,

I have attached a copy of our comments for the Cafo permit. Have a great day

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Cafo Permit Comments

Page 5 S2.A

- Adding Double Geomembrane Liners with leak detection to all lagoons will cost a lot of money and time.
- Will you be giving out grants to help with this substantial cost?
- Possibly change it so any new construction of new lagoons has to include a liner, 40-60 ml instead of a leak detection double liner.

Page 6 S2.B

- To apply for this permit we would have to publish a public notice?
- Cost money to put notice in paper
- Causes unnecessary work for not only people applying for permit but also Ecology having to go over comments. Waste of money and time.
- Allowing the public access to this will cause a big head ache for everyone involved

Page 8 S2.F 1

- After applying and receiving the permit you have it until you submit a completed Notice of Termination? It is a lifetime permit?

Page 9 S3.B

- Total Maximum Daily Loads? Limiting how much we can spread a day only slows down our timeline for disking and planting, it will not prevent over application.
- After spreading manure on a field we disk it in within 24 hours. If limited to TMDLs manure first spread on the field may sit there too long before the field is finished.
- If 10 loads a day are spread or 20 it is done at agronomical rates to insure our crops get the correct amount of nutrients and at harvest have a good yield.

Page 9 S3.C

- Prior to modifying lagoons have submit plans 180 days prior to planned start of construction. If something is wrong with the lagoon it needs to be fixed right away not in 6 months.
- We already get plans approved for building new lagoons by the conservation District. And hire PLSA to engineer and check after we build that the lagoon follows everything on the blueprint.
- Why have it approved by ecology and conservation district. Waste of time.

Pages 10& 11 S4

- Why have a MPPP when we already have to do a Nutrient management plan?
- It would cause more paperwork; we'd have to hire someone solely to take care of that. Cost us more money.
- Have to Modify the MPPP whenever there's maintenance. This is an unrealistic expectation on account that maintenance of our facility is an ongoing occurrence. If something needs to be fixed or repaired it is done then. We do not wait for it to break more and do maintenance once a year. Maintenance can include construction to make an area better.
- The MPPP would have more inspections on Dairies. Who is going to pay for this?
- After inspection only have 7 days to make revisions if needed? Need more time so it can be done correct instead of just rushing to get it done.
- All extra paperwork needed for the MPPP would be expensive to get gathered. Would have to hire someone to do this.

Page 15 S4.C 4 & 5

- Having regular inspections of pipes, valves and tile lines makes more paperwork to keep track of and will cost to have proper people inspect them.
- Diversion of clean water, clean water 'stored with other manure' is not clean water.
- Describing how to divert the water to prevent contact with contaminants is impossible. Old pipes can add contaminants to water and natural wildlife can contaminate it as well.

Page 18 S4.C 11

- Manure not getting applied from October 15 to the end of March (TSUM-200) is not needed for our area. This last winter we only got a few inches of rain.
- We start harvest early September till the end of October this does not leave time to get the necessary manure applied at agronomical rates for the next crop.

Page 26-27 S6

- Having to keep all the records of weekly inspections would cause us to have to hire someone to do that.

Page 28-29 S7

- Public does not need to know the ways we do things.
- Why does the DOE need to know our budget?

Page 33 G5

- Technology is constantly changing, always having to update because a new advance is made is very expensive.

Page 36 G16

- **Mosquito control general permit???**