Hi Christine,

Please review the attached document.

Thank you

*Ramesh Ravella, PhD, CPM*
Supervisor, Animal Feeding Operations
NC-DEQ-DWR

Ph: 919-707-3702
Email: Ramesh.Ravella@ncdenr.gov

512 N. Salisbury St
1636 Mail Service Center
Raleigh NC 27699 -1636

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*From: Strickland, Latoya <latoya.strickland@ncdenr.gov>*
*Sent: Thursday, May 12, 2022 4:17 PM*
*To: Ravella, Ramesh <Ramesh.Ravella@ncdenr.gov>*
*Subject: Mail from 05/11/2022*

Ramesh,

Please see the mail from 05/11/2022 attached for you. I have put the pathway to the extra attachment that is to big to attached to the me email. The PDF name is Attachments 1-78 to SELC Comments on 2022 Draft Swine Digester System General Permit (AWG400000). If you have any questions or concerns, please let me know.

*S:\0DWR\Section-AFOGWS\AFO Branch*

Thanks,

*Latoya Strickland*

*Administrative Specialist*
*GWRS/GWMB and AFO*
*Division of Water Resources*
*North Carolina Department of Environmental Quality*
*(919) 707-9129*
*Latoya.strickland@ncdenr.gov*
Hi Christine,

Please review the attached document for comments from Cavanaugh Associates.

Thank you

Ramesh Ravella, PhD, CPM
Supervisor, Animal Feeding Operations
NC-DEQ-DWR

Ph: 919-707-3702
Email: Ramesh.Ravella@ncdenr.gov

512 N. Salisbury St
1636 Mail Service Center
Raleigh NC 27699 -1636

Good afternoon,

Please see the attached mail from 05/12/2022 – 05/13/2022.

Thanks,

Latoya Strickland
Administrative Specialist
Animal Feeding Operations and Groundwater Section
Division of Water Resources
North Carolina Department of Environmental Quality
(919) 707-9129
Latoya.strickland@ncdenr.gov
Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties.
Is this the United States of America?

Where are we headed? Does no one care?

People are dying. They are sick. Their children are suffering as if we are in some Third World country. Do we have no heart? Imagine it’s you living next to these farms or biogas plants.

Scientific commentary that I have read indicates that nearby towns could potentially be further affected in the production of biogas. But it is unclear.

Unclear?

Can anyone please show us, WE, THE PEOPLE OF THE UNITED STATES, the evidence supporting that emissions from the production of biogas will not further harm the environment, air quality, pollution levels? I have read there have not been any recorded studies.

Do we not see that we need to formulate a plan with a definitive goal that will actually be met?

How is this decision being made?

Who is so selfish, insensitive, power driven and greedy for it all? Who’s getting rich? Who wins? Whichever lobby is the strongest. Show me those dollar bills. It’s such PIG SHIT literally. It’s not about what’s best for the public. And we ALL know it.

What happened to you, who feel that way? Why are you so greedy? Was it a trauma of sorts? Some reason to feel fearful, unsupported, alone? A way of being brought up to think for some reason you deserve more than the next human? No matter the demographic?

I am so very sorry. You’re removed from your heart and your connection to humanity. I believe it’s still there inside you somewhere.

We ALL could have it ALL.

We know this. Yet we act with fear. Fill the pocket books so fat they are bursting. Hold it tight, clenched in fists. Can’t spread it around. It’s rather baffling. And sad. I am sorry for those whose fear based greed corrupts them.

I cry for you. I cry for this world, such injustice. My tears fall over this mess of what we’ve become as a society. And I do see a better way arising as well. Soon things will begin to change.

Please think more. So many smart humans. Someone can create a better system.

Thank you for looking into your hearts and souls. Can you dig deep? Feel what matters? You know what is right.

Thank you for your time.

A very concerned citizen
I'm writing because I believe NC DEQ should *not* issue General Permit AWG400000 because biogas is NOT a way to mitigate climate change! In fact methane contributes to warming much more than CO2. Please deny the permit and encourage hog farmers to employ better and more environmentally-sound technologies to store and handle hog waste. Hog waste is and has been a long-term problem for NC, and we need DEQ to help farmers protect our groundwater and prevent hog lagoon breaches using modern methods that will protect our communities and our environment for the long-term. There must be better liners for hog lagoons. NC should not be in the biogas business. It's not viable -- it will exacerbate warming of the climate.

Please deny the permit,
Mara Frank
Raleigh, NC
Please find below comments on the DWR General Permit for anaerobic digesters on swine farms and relevant attachments. Thank you, Kurt Olson.
Please, methane is worse for the environment than CO2. And hog poop lagoons leak methane and people who live near them are getting sick.

I know that our legislators don't care but I would like one of them to try to live near a hog poop lagoon and try to manage that terrible smell, the respiratory consequences and lowering of home values.

This pig waste must not be allowed in these huge lagoons that flow into rivers during floods and hurricanes. It is unhealthy and sickening.

Jade Dell
Wake County, NC
Dear Mr. Ravella,

I am Sydnie Parry and I work with Coastal Carolina Riverwatch. To my concern, biogas does nothing to improve the polluting lagoon and spray field systems that we currently have in place at industrial swine operations. Biogas would be dependent on these systems and therefore it is not a sustainable solution to these problems. Biogas is a complicated process with no safe or efficient methods to make it easily accessible. This means that we are unable to do it on a large scale. The industrial animal operations we already have are increasing harmful impacts on our environment and communities. CAFOs and Biogas projects are impairing our water sources causing contamination and air pollution to the surrounding areas. It is important that any DEQ permits must be strictly enforced for compliance. They must include strong, regular monitoring provisions for our water sources, frequent upkeep with appropriate measures for waste management plans, and utilization of environmentally superior technologies. It is our job to be mindful of the actions we take. We need to ensure that our motivation in providing for our community is safe, efficient, and ethically driven to ensure that we are making positive impacts. I urge DEQ to consider this as this process continues.

Thank you,

Sydnie Parry

Sent from my iPhone
Dear Mr. Ravella,

My name is Rebecca Drohan and I am White Oak Waterkeeper with Coastal Carolina Riverwatch. We are a water quality advocacy nonprofit serving waterways in Eastern NC. Thank you for the opportunity to submit comment on the draft digester general permit. I have provided oral comments but would like to submit a written copy simply for the records.

Biogas does nothing to improve the outdated lagoon and spray field system. Instead, it may worsen environmental impacts from existing facilities, such as further concentrating ammonia, which already impacts those nearby.

Biogas projects will perpetuate the water contamination, air pollution, and degraded quality of life from the archaic lagoon and spray field system. Communities of color and/or low-income are disproportionately affected by this pollution. Little has been done to protect these communities from health impacts and the ability to enjoy their home and environment.

In surface water samples, Waterkeepers and officials across the state have seen consistent elevated levels of bacteria surrounding CAFOs, indicating that existing regulations are lacking. As biogas will further entrench this pollution, these projects are not a sustainable solution.

Any DEQ permitting for digesters must be stringent and compliance must be strictly enforced.

At minimum permitting should include:

- Robust provisions for frequent groundwater and surface water monitoring
- Utilization of environmentally superior technology, for waste disposal
- Appropriate waste management plans, and
Deterrence of violations through enforcement.

Considerations still worth mentioning include air quality impacts and environmental justice analysis.

It is imperative that the cumulative impacts of biogas be thoroughly evaluated in reference to all surrounding pollution sources. Especially those already inflicted by North Carolina’s existing CAFO industry.

In addition to considering the environmental and public health impacts of biogas, measures to promote transparency, public engagement, and reporting, are imperative as well.

Given that Biogas is dependent on emissions created from waste, it is not a renewable resource as compared to solar and wind, despite what the industry claims.

Biogas transport pipelines spanning across multiple counties pose significant environmental risks as well.

In this process, please bear in mind that now is the critical time we need to be investing in an equitable transition to true clean energy. We must prioritize the protection of our land, waters, and communities over further dependence on destructive industrial systems and greenwashed platitudes. As it stands, this responsibility for action lies with the DEQ. Please consider the future of all North Carolinians as this decision-making process proceeds.

Thank you again for this opportunity to comment.

Sincerely,

Rebecca Drohan

--

Rebecca Drohan
White Oak Waterkeeper
919-961-3299 | RebeccaD@coastalcarolinariverwatch.org
www.CoastalCarolinaRiverwatch.org
700 Arendell Street, Suite 2, Morehead City, NC 28557
To whomever it may concern,

I have included below Toxic Free North Carolina's comments on the proposed permit listed above.

All the best,

Connor Kippe

--

Connor G. Kippe (he/him/el)
Policy Advocate, Toxic Free NC
919.348.9104 | toxicfreenc.org
Please see the attached comments on the Farm Digester General Permits from the North Carolina Farm Bureau Federation.

Thanks,
Keith Larick

---------------------------------------------------
Keith Larick
Natural Resources Director
North Carolina Farm Bureau Federation
Phone: (919) 987-1257
Cell: (919) 749-5293
www.ncfb.org
Please accept the attached comments on behalf of the NC Pork Council.
Hello:

MAIN POINT:
METHANE wrecks the climate, and these LEAK METHANE
Environmental racism issue: cumulative and disproportionate impacts.
So not be pushed and proliferate in CLIMATE EMERGENCY,
What is needed :
Strong water quality monitoring, not going to happen because DEQ budget keeps
getting CUT.
Transparency in the rule-making and in data collection for permitted operations

Preferred term is factory farmed methane gas. Even though it is the preferred regulatory
term biogas is a term that does not illustrate the proper make up of the waste.

Of concern are the environmental impacts of animal methane in general and the
health and safety of people who live near CAFOs, who are being harmed by the
outdated lagoon and sprayfield waste systems that these factory farms use.

The lagoon and sprayfield waste management system in use at industrial hog
operations causes water pollution, dirties the air we breathe, sickens people, and even leads to
premature death.
DEQ: Protect our water, air, and nearby communities!
As a lifelong resident of Sampson County I have grown up acute to the environmental aspects around the county. With so many issues where would one start?

I did not attend the last public comment meeting held at the civic center here in Clinton in April due to the feeling local residents’ opinions were not considered at the hearing for the plant on HWY 24 for the biogas.

This time I am putting my comments in writing for the whole wide world to see.

Now we are again with another public hearing and I would like to protect our air and water from hog waste pollution from lagoons that will generate biogas untreated waste into our drinking water. This is an environmental crisis. It is bad for our health. Also this hog waste is sprayed on fields and the wind takes it in the air and we breath it. Sometimes it runs into lakes and streams.

Please include common sense protection guards into these permits to help us live normal healthy lives. I would like for it to be quarterly monitoring by the state.

If you do this we can at least say you listen.

Sincerely,

Barbara Faison
Dear Department of Environmental Quality,

Factory farm hog waste is a big problem in North Carolina, and the draft Swine Digester Waste Management System General Permit threatens to make this problem worse. Animal Feeding Operation permits must protect our air, water, and communities.

We already have over 2000 hog waste facilities across the state that pollute our air and water and harm surrounding communities. The antiquated lagoon and sprayfield system pollutes our water through leaks and overflowing lagoons, emits air pollution that makes local residents sick, and has a stench so foul that neighbors often can’t open their windows or go outside.

We need better protections in any general permits for existing AFO expansion. DEQ’s draft general permit fails to protect our environment or families living nearby these hog operations, and it does not meet state and federal requirements. The General Permit must add common-sense protections for our water, air, and nearby communities, including at a minimum: prohibiting open air lagoon and sprayfield systems, stronger requirements for preventing runoff or overflows, and a more robust monitoring system so we know when these facilities are contributing to water and air pollution.

I urge DEQ to protect our water, air, and communities by including these requirements in general permits for existing AFOs.

Sincerely,

Anita Shaffer
219 s cheatham st
Franklinton NC, 27525-1501
To Whom it May Concern:

We respectfully submit the attached comments for the record in the 2022 Draft Digester System General Permits public comment period.

Please let me know if you have any issues accessing the attached files, questions, concerns, or otherwise.

Thank you for your consideration in this matter.

Sincerely,

CleanAIRE NC

JOEL PORTER
Manager, Policy | CleanAIRE NC
O 704.307.9528, Ext. 105 | M 913.271.2899
www.CleanAIREnc.org

CELEBRATING 20 YEARS OF CLEAN AIR ACTION!
Attached are comments on behalf of Waterkeeper Alliance and Waterkeeper Carolinas.

Best wishes,

Ryke

Ryke Longest
(he/him/his)
Director of Clinical Programs
Co-Director, Duke Environmental Law & Policy Clinic
Clinical Professor of Law
Duke School of Law
Clinical Professor of Environmental Sciences and Policy
Nicholas School of the Environment
longest@law.duke.edu
I am writing in concern of the residents who will be engulfed and surrounded by the plants of Smithfield/Dominion-Align Group on BF Grady Rd. and the Montauk/Turkey Creek Ag LLC coming to Hwy 24, Turkey, NC. Both located 1 mile from each other in Sampson Co. with Turkey township located in between both companies and both within the ETJ of the town. With this COVID pandemic being the focus of most government, media and population at large, it was difficult to turn attention to the local news and what was happening in our current surroundings. This is my first public comment for any public related topic so forgive me if it is not in correct format, but this town is near & dear to me as my childhood home, where my family and friends live, and I know this will have an impact on them in one way or another and I am passionate about this situation.

Our town located near the border of Sampson/Duplin line near I40 has been established for many, many years with generations of families and farmers calling this their home for life. In the last 3-4 years the recent news of not one but Two Digestive System plants (fancy name for hog manure recycle) want to surround our properties with very little say or consideration from the residents. Being a low to moderate income town, several residents, being Hispanic and African American minority decent, may not have access to internet so majority of the resident were unaware of the Bill 605 passed in 2019 by NC legislation. The public comment meetings held in April by DEQ were scarcely known and there was no community knowledge of land that was purchased by the two above large companies within the ETJ of Turkey for the purpose of turning hog crap into bio and natural gas.

Unfortunately, due to today's deadline of submitting public comment, I have not had the time to review and research all of the articles and permits like I would normally and some of the questions below may be answered in line items already but please review following questions that need to be addressed

Who will be monitoring these systems on a daily, weekly or monthly basis?  
Who will be responsible for public contacting in case of emergency relating to system?  
Are the farmers themselves responsible for paying for the pipes to connect to the main system?  
Why are these plants and waste pipes located within the ETJ of the town of Turkey?  
Is there a 100% guarantee these pipes will not leak or erode or break under pressure?  
Will any resident living within the pipeline area be forced to have pipes go through their property?  
Why were all residents located near facility not notified prior to Bill 605 passing and given a copy by mail?  
What affects may this have on their quality of living including air and drinking water?  
What is predicted to happen years down the road to residents when the public attention has faded from plants?  
What about natural disasters. Will these permits protect any leakage or spillage from any exposed waste?
Will Hispanic & African American minority groups be monitored for their water quality and if affected later?
Will the surrounding residents be forced to be the "ginny pigs" of this experimental "hog waste" natural gas alternative?

It is realized the hard work and background testing so far that has gone into these projects but is this is all due to the new policies set forth to discover new and initiatives ways to create new forms of energy. It is well & good but not at the expense of the local citizens air quality and potentially water quality affecting the entire environment as a whole. Not to say the decrease in property value. Who would want to live in eastern Sampson County near hog crap plants and be living on top of underground manure pipelines from local hog farm lagoons?

Speaking of farmers, other than having the lagoons drained which of course is a big problem at the time, what benefit will it serve our local community? Will these processing plants bring in more middleclass jobs, more to the economy, more residents to the community? Would you move Sampson/Duplin County near these plants? In other words, the ones who will be benefiting the most will be large Smithfield/Dominion-Align group and this new Montauk/Turkey Ag LLC. So far, according to Montauk engineer who spoke at the December Turkey Town Meeting only 30 jobs will be created, and these will be engineer and executive positions. Not many of those in our community.

We are for the farmers and assisting in the best way possible to help keep farms going nor against the process if it may work. The biggest concern for this large undertaking is LOCATION, LOCATION, LOCATION! These local residents who have generations of family and farmland in that area have no place else to go. Stricker regulations of all types need to be engraved in these permits and accountability needs to be implemented. In other words, MOVE THE PIPES AWAY FROM RESIDENTIAL AREAS.

According to a local non-profit organization office in Sampson Co. a team of experts are surveying county areas at high risk for the water quality and above-mentioned concerns. Speaking to the Sampson/Duplin NC representative assistant who initiated Bill 605, when asked what types of surveys were conducted and if they stayed near hog farms to conduct their survey, the answer was No. It was asked would they live near the plant, the answer was No. It was asked could they 100% guarantee there would be no hog manure smell or spillage from trucks hauling to plants at beginning of process, the answer, No. As it goes, its only different if it affects someone directly.

Consider the case in CA 1993, when Pacific Gas company involving older underground pipes contaminated the water due to leakage & corrosion eventually seeped into the air causing multiple illnesses to local residents including cancer. This resulted from poor monitoring and safety regulations.
As you know Smithfield has already been in a lawsuit recently over some of these matters. There should be no other causes or future situations that would cause a division between community and company. No matter what type of material pipes may be manufactured, it still cannot surpass the passage of time and wear. Any bills passed and permits adjusted to fit the needs of the company will have effects of the people eventually.

Consideration of voters' health & safety from politicians need to be thought of more than marketing and monetary gain. For this type of undertaking, all permits dealing with hazardous material should be denied if not as far away from a populated area as possible. See article
grist.org/hogwash.
Some of this information may not relate to the permit division but please pass on to division that can assist in location of plants. Thank you.

Nicole Mobley
Hello Ramesh Favella,

Please find EDF’s comments on the draft swine biogas general permit.

With regards,

Joe

*************************************

Joe Rudek, Ph.D. (he/him)
Lead Senior Scientist

Environmental Defense Fund
Philadelphia, PA
C 484-431-6768
jrudek@edf.org
www.edf.org
Attached.

Edgar Miller  
Executive Director/Riverkeeper  
Yadkin Riverkeeper, Inc.  
edgar@yadkinriverkeeper.org  
336.688.2651  
www.yadkinriverkeeper.org
Please see the attached correspondence for TRC’s comments.

Thanks,

Dave

David L. Elam, Jr.
Vice President and Project Director
Dear Sirs and Mesdames:

I am writing to request the modification of the draft general permit for CAFOS that intend to operate a digester. Unfortunately:
1. This permit does not require clear, safe technology be used to dispose of hog waste. It does not get rid of open lagoon and spray fields.
2. The requirements to prevent leaks and overflows need to be strengthened.
3. Groundwater and surface water monitoring must be more robust.

Please require:
1. Robust groundwater and surface water monitoring data at every hog operation to identify pollution to rivers, streams and groundwater, which is a source of drinking water for many rural citizens.
2. Covered secondary lagoons.
3. Injection of waste into soil rather than spray field systems to avoid spreading the waste through the air.
4. More rapid reporting of major spills.
5. More protective freeboard requirements such as automated lagoon/storage pond waste-level monitors and recorders to reduce the likelihood that flooding or inundation of lagoons due to increasing frequent and severe storms will result in the discharge of the more harmful digester waste.

Other states have requirements for much cleaner technologies. Why does NC allow pollution from the large number of CAFOs? My family’s drinking water can be and has been at risk from CAFO pollution. Please set standards that will guarantee clean drinking water, or, at the very least, no pollution from CAFOs.

Sincerely,
Clarice K. Reber
7919 Blue Heron Dr W,
#305
Wilmington, NC 28411

Clarice Reber
claricereber@icloud.com
Thank you for the opportunity to provide public input.

Jeannie Ambrose
Dr. Ravella,

Please find attached comments on DEQ’s draft farm digester general permit. The Southern Environmental Law Center submits these comments on behalf of over a dozen impacted community groups and conservation organizations in the state, including the Duplin County Branch of the North Carolina Conference of the NAACP, North Carolina Poor People’s Campaign, Cape Fear River Watch, Environmental Justice Community Action Network (EJCAN), North Carolina Conservation Network, CleanAIRE NC, Waterkeeper Alliance, North Carolina Sierra Club, Sound Rivers, Yadkin Riverkeeper, Coastal Carolina Riverwatch, Toxic Free NC, Clean Water for NC, Center for Biological Diversity, Women’s International League for Peace and Freedom of the Triangle, Appalachian Voices, and Vermont Law School Environmental Justice Clinic.

All attachments can be found at this link, which will remain active for a month: https://southernenvironment.sharefile.com/d-s16fba06702ec4b6d91106bd068e41c30. I am also mailing a hard copy of the comments along with a USB with all attachments to the mailing address provided in the public notice.

Thank you in advance for your consideration of these comments. Please be in touch with me if you have any questions or want to discuss these comments further.

Sincerely,

Blakely E. Hildebrand (she/her)
Senior Attorney
Southern Environmental Law Center
601 West Rosemary Street, Suite 220
Chapel Hill, NC 27516

Office (919) 967-1450
Direct (919) 391-5153
Fax (919) 929-9421

southernenvironment.org

This electronic message and any attached files are confidential and are intended solely for the use of the addressee(s) named above. This communication may contain material protected by the attorney-client, work product, or other privileges.

Please consider the environment before printing this email.
Dear Mr. Ravella,

Please see the attached petition signed by 746 North Carolina residents urging the NC Department of Environmental Quality to issue the strongest possible protections, including air and groundwater monitoring and reporting, in the 2022 Draft Swine Digester System General Permit (AWG400000).

Thank you,
Brittany

Brittany Iery
NC Conservation Network
Online Organizer
brittany@ncconservationnetwork.org
P: 919.857.4699 x 108
To whom it may concern,

My name is Ricky Harper and I am a resident of Duplin County, NC. I own a farm which is adjacent to a swine farm with a lagoon which can be very smelly, especially in the summer time. I understand the general idea of the digester system and the encapsulation of the hog waste and I am very much in favor of permitting the encapsulation of the swine waste lagoons in NC to improve the quality of our farm environment.

Thank you for your work!

Ricky J. Harper
Dear Sirs:
I am very concerned about the impact of hog waste lagoons and sprayfield methods on the surrounding people who live there and the environment.

Biogas is NOT a clean energy source; it is outdated and harmful.

Please put monitoring provisions in the permit to evaluate the impact of the biogas operation on people and the environment.

Please put monitoring for groundwater & surface water to ensure compliance with the "nondischarge" requirement.
Please prevent leaks and overflows.
Please require that modern, up-to-date technology be used to deal with the hog waste.

Sincerely,
Judy Mattox
15 Morning Star Dr.
Leicester, NC 28748
Concerning General Permit #AWG400000, #AWG500000, #AWG600000

I am a dairy farmer in Iredell County who attended public meeting on April 19, 2022 at Statesville Civic Center, Statesville, NC.

I now understand how it feels to be "gaslighted" by groups of people who do not appear to have an understanding of the regulations we are required to operate under

and do so diligently. Our mission is to provide top quality, local milk using best management practices. We are a sustainable fourth generation dairy farm who's

employers and employees believe in leading the way to conserving and improving our animal husbandry as it pertains to soil, water, and air.

Clean water is essential to our business. The addition of farm digesters have been proven to provide renewable energy without any detriment to water quality.

Therefore, I humbly submit that we are not the "bad guys" some make us out to be. Barry C. Myers, President of Myers farms, Inc.
Dear DEQ,

As a taxpayer of NC, I am writing to urge you to consider the voices of our citizens OVER the voices of paid lobbyists and business owners/operators who stand to gain financially on this issue. It is these entities who should, in face, be footing the bill for all the environmental protective measures that NCDEQ needs to put into place to create a system of operating these digesters in a way that considers the safety and health of ALL of us, especially those who are disenfranchised and side-lined by more powerful neighbors.

In addition to paying taxes and living here in NC, I also volunteer for the local Sierra Club chapter, the Coastal Carolina Riverwatch chapter, the NC Coastal Land Trust and Cape Lookout National Seashore. I recognize the value of a safe, healthy and clean NC.

Suzanne Wheatcraft
585 738 9085
Upon issuance of coverage of the general permit those operating the digester should receive appropriate training and associated certification. The other members of the operator training and certification commission agree that the certified operators should receive training.
Thank you for carefully considering my comments below.

As a member of the Sierra Club, Capital Group, I spoke to DEQ last December about the issue of permits for biogas at CAFOs.

My objection to granting water permits was based on the likely runoff harming rivers and streams, and drinking water in the area. A secondary concern was that we do not need methane produced from hog waste. Methane gas, were it to escape from a pipeline, is a much bigger threat to our climate than emissions from gas-powered vehicles, and we are already threatened by that.

Since DEQ will grant these digester permits, I now express my concern about some of the standards and especially about the enforcement of permit regulations.

Concern about performance standards:

- In Section I, item 12, the permit specifies that there are required distances of 25, 50 and 75 feet between swine animal operations and rivers, streams, or canals with the distances based on the date of the site installation. Please consider making all these distances 75 feet, since the older installations are most likely to fall into disrepair and pose the greater hazard.
- In Section I, item 17, the permit specifies that if the digester system creates nuisance conditions the permittee must take corrective action as you specify. Perhaps that section needs to address specific penalties for failure to comply.

I cannot comment on the digester specifications in Section II because I am not an engineer. However, I understand from staff at the Sierra Club that there are new and better technologies to handle this. I would urge DEQ to investigate those and consider sunsetting this technology as soon as possible.

Concerns about enforcement:

Section III is critically important. The regulations specify that

“An inspection of the waste collection, treatment, and storage structures, and runoff control measures shall be conducted and documented at a frequency to ensure proper operation but at least monthly and after all storm events of greater than one (1) inch in 24 hours.”

Yet this is a self-inspection and report by the OIC. The same is true of item 23 where the permittee conducts an annual biogas leak detection. My concern is that the OIC is hired by the owner and accountable to him/her and not to the public. DEQ is responsible to the public, but there is no mention of your staff conducting inspections on the regular basis. You simply reserved the right to do so at any time.

Will you have the staff and budget to monitor compliance?

As a recent widow, I frequently visit Oakwood Cemetery. As I drive through that neighborhood I see signs that read, “Drive as if your children lived here.”

I respectfully ask DEQ to regulate as if your children and grandchildren played on the farms adjacent to the digester systems.
I have come to understand that regulations proposed to protect the environment and people from the effects of biogas produced in the course of hog farming are grossly inadequate for their purpose; and protect the industry more than those who might be harmed by it.

This matters because many of our more vulnerable people live near these places. They should be protected to the highest possible standard. But all of us have an interest in healthy water and air. And with climate change occurring, this all becomes more urgent and significant.

Please strengthen these regulations and give them teeth.

Ann Karson,
5 Oak Court,
Candler, NC 28715.
Dear Department of Environmental Quality,

Factory farm hog waste is a big problem in North Carolina, and the draft Swine Digester Waste Management System General Permit threatens to make this problem worse. Animal Feeding Operation permits must protect our air, water, and communities.

We already have over 2000 hog waste facilities across the state that pollute our air and water and harm surrounding communities. The antiquated lagoon and sprayfield system pollutes our water through leaks and overflowing lagoons, emits air pollution that makes local residents sick, and has a stench so foul that neighbors often can’t open their windows or go outside.

We need better protections in any general permits for existing AFO expansion. DEQ’s draft general permit fails to protect our environment or families living nearby these hog operations, and it does not meet state and federal requirements. The General Permit must add common-sense protections for our water, air, and nearby communities, including at a minimum: prohibiting open air lagoon and sprayfield systems, stronger requirements for preventing runoff or overflows, and a more robust monitoring system so we know when these facilities are contributing to water and air pollution.

I urge DEQ to protect our water, air, and communities by including these requirements in general permits for existing AFOs.

Sincerely,

Dorothy Lee
62 Salem Rd
Weaverville NC, 28787-9417
To whom it may concern

I am a pork producer from Wayne County, NC and I support the comments submitted by the North Carolina Pork Council.

Thank you,

Denise Waller Mason

Denise Waller Mason
Training and Development Coordinator
HR Support
919-853-7774 (direct line)
919-738-0339 (cell)
Attached, I am submitting comments on the swine digester draft permit.

Thank you,

Jared Porter
Porter Farms, Inc
Dear Department of Environmental Quality,

Factory farm hog waste is a big problem in North Carolina, and the draft Swine Digester Waste Management System General Permit threatens to make this problem worse. Animal Feeding Operation permits must protect our air, water, and communities.

We already have over 2000 hog waste facilities across the state that pollute our air and water and harm surrounding communities. The antiquated lagoon and sprayfield system pollutes our water through leaks and overflowing lagoons, emits air pollution that makes local residents sick, and has a stench so foul that neighbors often can’t open their windows or go outside.

We need better protections in any general permits for existing AFO expansion. DEQ’s draft general permit fails to protect our environment or families living nearby these hog operations, and it does not meet state and federal requirements. The General Permit must add common-sense protections for our water, air, and nearby communities, including at a minimum: prohibiting open air lagoon and sprayfield systems, stronger requirements for preventing runoff or overflows, and a more robust monitoring system so we know when these facilities are contributing to water and air pollution.

I urge DEQ to protect our water, air, and communities by including these requirements in general permits for existing AFOs.

Sincerely,

Anthony Ladd
120 Creekview Circle
Carrboro NC, 27510-1278
CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

Dear Department of Environmental Quality,

Factory farm hog waste is a big problem in North Carolina, and the draft Swine Digester Waste Management System General Permit threatens to make this problem worse. Animal Feeding Operation permits must protect our air, water, and communities.

We already have over 2000 hog waste facilities across the state that pollute our air and water and harm surrounding communities. The antiquated lagoon and sprayfield system pollutes our water through leaks and overflowing lagoons, emits air pollution that makes local residents sick, and has a stench so foul that neighbors often can’t open their windows or go outside.

We need better protections in any general permits for existing AFO expansion. DEQ’s draft general permit fails to protect our environment or families living nearby these hog operations, and it does not meet state and federal requirements. The General Permit must add common-sense protections for our water, air, and nearby communities, including at a minimum: prohibiting open air lagoon and sprayfield systems, stronger requirements for preventing runoff or overflows, and a more robust monitoring system so we know when these facilities are contributing to water and air pollution.

I urge DEQ to protect our water, air, and communities by including these requirements in general permits for existing AFOs.

Sincerely,

Catherine Nisselson
307 W Palmetto St
Kill Devil Hills NC, 27948-7868
To whom it may concern. I am writing in support to include the covering of existing manure lagoons and installing digestors in the General Permit for existing farms. These modifications will reduce the current emissions that are released to the air and are an important part of moving our existing energy consumption to more environmental responsible source.

Thank you,

Lukas Sorensen
Director, Field Services
Dear Division of Water Resources,


Thank you for your service to the state and thank you for the opportunity to provide written comments.

Regards,

Peter Daniel, Jr.
Director of Government Affairs
919-825-1139 (o)
919-830-2774 (c)
701 Corporate Center Drive, Suite 275
Raleigh, NC 27607
Good morning. Please find, attached, comments regarding the General Permit documents for Farm Digesters. We appreciate the opportunity to provide comments, and the efforts of DEQ staff to facilitate this process. Please contact me at your convenience if you have any questions or wish to discuss our comments. Thank you.

Regards,

Gus Simmons, P.E.
Director of Bioenergy
O: 877-557-8923 C: 910-619-0072
www.CavanaughSolutions.com
From: Rocky Creek
To: SVC_publiccommentsDWR
Subject: [External] Emailing: Waste management system letter RCD
Date: Thursday, April 28, 2022 2:12:06 PM
Attachments: Waste management system letter RCD.pdf

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.<mailto:report.spam@nc.gov>

Your message is ready to be sent with the following file or link attachments:

Waste management system letter RCD

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.
Please accept the attached comments on the draft farm digester general permit submitted on behalf of Nolan Davis, Mayor of Milford City, Utah; Matt Robinson, Mayor of Beaver City, Utah; and Wade Hollingshead, Commissioner, Beaver County, Utah. These elected community leaders have direct experience with digesters in their communities.
Hello - please see the attached letter that I have written in regards to the proposed general permit for the lagoon and sprayfield system. Thank you for considering my comments.
Deborah Milkowski
New Bern, NC 28562
I would like to express my opposition to issuing a general permit for biogas generators at CAFO's. If approved I think each site should be issued its own unique permit. Each site has its own particular conditions. There are better methods to deal with the animal waste, I don't believe the digesters are the most effective method of protecting water quality, air quality and controlling odors.

Thank you,

Ben Barnes
Elm City NC
US PUBLIC COMMENT NCDEQ-DWR,

Our actions today affect future generations of humans and non-humans alike. The draft general permit for industrial hog facilities producing biogas does not provide enough protection from pollution.

It is the responsibility of the North Carolina Department of Environmental Quality to ensure any permits issued are protective of our resources and communities. We know that just because a permit is in place, does not mean it prevents pollution, and the draft general permit is not much more robust than the current general permit for swine facilities. Stronger requirements for water-quality sampling must be included in the general permit to ensure these facilities are not discharging waste into our waterways.

The draft permit also needs to be more selective in which facilities are eligible to apply for coverage: facilities with a history of violations, that are not abiding by the current permit, should not be eligible to be covered by this permit.

Thank you for your consideration,
Deb and John Johnston

Debra Johnston
giraffe0613@outlook.com
119 Hill Creek Rd
Blounts Creek, North Carolina 27814
As the former Associate Director of the NCSU Animal and Poultry Waste Management Center during the period 2000-9, which coincides with the efforts made to identify and evaluate new and superior technologies for handling swine waste, I would like to provide observations on the efforts to alter the General System Permit. Some of my comments will fall outside of the specific language of the Permit, but are intended to provide perspectives as I see the need for them, and to result in support for addressing such environmental issues as may occur associated with the production systems for swine used in Eastern North Carolina.

In 2022 we are seeing a very much enhanced and appreciated effort to address climate change and environmental issues on a National scale (as well as Global). I totally support that set of goals. I am currently and have been for many years involved with these efforts on a broad scale. However, I choose to address swine waste management as noted above, with SUGGESTIONS that I would propose be considered to help retain and maintain the swine production system in Eastern North Carolina as a MAJOR contributor to the economy of the region. While at the same time CONTRIBUTE to broader efforts to insure that such production is TOTALLY compatible with the surrounding communities, and their economic health, while as well contributing to the protection of the total (air, water and land) surrounding environment. Such a goal is consistent with SIGNIFICANT interest at the national level to achieve these same goals. It therefore is also consistent with access to resources to assist in creating the swine production system that we ALL would like to see moving into the future. This results in the proverbial "win/win" condition!

My comments relevant to the written draft of the permits are relatively few. And they relate primarily to what I personally think is the need to add Phosphorus to the existing requirement to address Nitrogen need for the production of whatever crops are being fertilized by residuals from the anaerobic digestion of swine waste. Many states that are significant swine producers already have this in place and the work done at NC State by Professor Joe Zublena and others many years ago established the mechanism for that to happen. To NOT include it in the proposed permit
considered here is a MAJOR oversight and I encourage it to be reconsidered. I also feel that this needs to be included in ALL OTHER permits for ALL sources of animal and poultry waste used in North Carolina. While sulfur analysis is also suggested, I feel that this is related to the significant contribution that sulfur containing compounds make to the odors that may be emitted from swine waste as currently managed rather than as a soil nutrient issue. (That is a personal consideration only and will indirectly be addressed below.)

What follows is my personal suggestion or suggestions for ways that this permitting process could, but taking advantage of the NATIONAL concern about animal agriculture in the emissions of green house gases (GHG), primarily methane and to a lesser extent nitrogen containing compounds in developing a COMPLETE waste handling system that addresses virtually ALL of the areas of concern by the public and climate concern groups.

My ideal swine production system would be as follows (I would be glad to expand on any of these points below in a different venue at your request):
   a. All swine waste primary digestion lagoons would be covered as this permit specifies, and as the requirements spell out;
   b. Biogas from the primary lagoon will be collected, and transported by LOW pressure pipeline to a scrubbing facility for production of pipeline quality gas which can be immediately injected into a natural gas pipeline (priority), or/and if necessary natural gas storage tanks under pressure for transport and used as natural gas elsewhere; the biogas will be scrubbed of carbon dioxide, ammonia and volatiles at the transfer or storage center;
   c. The scrubbed carbon dioxide can be used for industrial purposes or sequestered for retention as carbon in soil or other removal processes from the atmosphere, and the ammonia can be captured for use as fertilizer; the volatiles can be captured and destroyed by a variety of methods but in the process eliminated as a source of odors.
   d. The effluent leaving the primary digestion lagoon would be held in a retention lagoon or pond, COVERED to collect any residual gases, which would be transferred to the scrubbing facility as part of the transfer from the primary digestion lagoon; liquid from that lagoon would be recycled to the flush tanks in the animal barns to flush the waste to the digestion lagoon on a cycle of 6-8 times per day;
   e. Land application of the liquid from the retention lagoon (d.) would be land applied by direct injection or if surface applied (at a distance of 2-4 inches from the surface) be incorporated immediately by soil tillage; spray/sprinkler systems would no longer be allowed; this would SUBSTANTIALLY eliminate odors in surrounding areas,

Please contact me if you wish to discuss or pursue.
Thank you!

Leonard S Bull, PhD, PAS
I am very concerned that the draft permit for hog waste biogas production does nothing to implement cleaner technologies for managing hog waste at CAFOs in North Carolina. Instead, the design of the biodigester system will lock in place the antiquated system of hog waste management using open lagoons and sprayfields that often results in ground and surface water pollution and harm to nearby communities affected by the airborne drift of the hog waste sprayed on fields.

As you know there are alternate cleaner technologies that have been tested in NC. And other states like Missouri are implementing cleaner hog waste management systems. Since biogas will be another source of profit for CAFOs, this is a good opportunity to require less polluting technology be used to dispose of the hog waste after the biogas is collected.

If the open lagoons remain in place, please consider:

- Strengthen requirements to prevent leaks and overflows from the open lagoons. Require waste-level monitors. Increase fines for violations.
- Require CAFOs with biodigesters to implement robust monitoring of ground and surface water to identify pollution and promptly report to DEQ. This is especially important since the concentration of ammonia will be higher in the waste leaving the digesters. The land application plans may need to be adjusted to prevent excessive nutrient loadings to our waters.
- Replace spray fields with direct injection of waste into fields to reduce the airborne spread of hog waste to nearby residents.

Please ensure that the biodigester permit protects the health of our waterways, our groundwater, and nearby communities.

Thank you.

Beth Hansen
3722 Amber Drive
Wilmington, NC 28409
Dear Ramesh Ravella,

Industrial hog operations are making North Carolinians sick and can lead to premature death. You can help.

A fast-tracked, cookie-cutter permit for the facilities that continue to put Black, Latino, and Indigenous families at disproportionate risk is not the answer. We want better biogas solutions that are already reducing pollution and harm to communities in other states.

Please incorporate commonsense protections for our water, air, and people into the biogas general permit. This includes, at a minimum, stronger requirements to prevent pollution from industrial hog operations and robust monitoring to ensure compliance.

We deserve clean water and to breathe easier. Thank you.

Regards,

Janet Parkins
4285 Gilbert St
Oakland, CA 94611
Dear Ramesh Ravella,

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Please incorporate commonsense protections for our water, air, and people into the biogas general permit. This includes, at a minimum, stronger requirements to prevent pollution from industrial hog operations and robust monitoring to ensure compliance.

We deserve clean water and to breathe easier. Thank you.

Regards,

Joyce Frohn
425 Congress Ave
Oshkosh, WI 54901
To whom it may concern,

I'm a concerned citizen of North Carolina, and am outraged by our state's antiquated system of hog waste management using open lagoons, often unlined, and spray fields. This ignorant disposal of waste is not only an environmental threat but also a public health hazard, disproportionality affecting the communities around these CAFOs, many of these communities are already marginalized making the negative effects of hog waste even worse for them.

The lack of care for disposal reflects the state's lack of care for environmental justice communities. If this pollution were affecting more affluent communities, the state would be quick to jump into strengthening these hog waste management systems. The technology is available and being enforced and used in other states for hog waste. So why isn't North Carolina trying to improve its disposal techniques, when technology is already available to do so? Is the health of your citizens worth less than the bottom dollar?

This draft of the NCGA 2021 Farm Act calls for a general permit for CAFOS to require and operate a digester, now this is a great step in the right direction as it captures methane to use for energy instead of it being released into the atmosphere. However, this is NOT ENOUGH. This draft also needs to address how the remaining waste from the anaerobic digester will be transferred to a secondary open lagoon and the spray field system will still be used with all the water pollution and health impacts on nearby residents.

After this draft is passed, it will be even more challenging to get these requirements in place.

Please consider the following and include having covered secondary lagoons, the injection of waste into soil rather than spray field system to avoid spreading the waste through the air, more rapid reporting of major spills and of course, Cleaner technology and practices that are compatible with biogas production and address water and air pollution caused by the lagoon and spray field system, particularly given the increased ammonia pollution associated with open storage of biogas digester waste.

You are putting your citizens at risk by allowing this abuse of the environment to continue.

Best,

A rightfully concerned citizen
Dear Ramesh Ravella,

Industrial hog operations are making North Carolinians sick and can lead to premature death. You can help.

A fast-tracked, cookie-cutter permit for the facilities that continue to put Black, Latino, and Indigenous families at disproportionate risk is not the answer. We want better biogas solutions that are already reducing pollution and harm to communities in other states.

Please incorporate commonsense protections for our water, air, and people into the biogas general permit. This includes, at a minimum, stronger requirements to prevent pollution from industrial hog operations and robust monitoring to ensure compliance.

We deserve clean water and to breathe easier. Thank you.

Regards,
Steven Vogel
449 Hampton Ct
Falls Church, VA 22046
From: I. Engle
To: SVC_publiccommentsDWR
Subject: [External] We deserve better hog waste solutions
Date: Friday, April 22, 2022 2:36:25 PM

Dear Ramesh Ravella,

Industrial hog operations are making North Carolinians sick and can lead to premature death. You can help.

A fast-tracked, cookie-cutter permit for the facilities that continue to put Black, Latino, and Indigenous families at disproportionate risk is not the answer. We want better biogas solutions that are already reducing pollution and harm to communities in other states.

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Regards,
I. Engle
605 Bosque St
Tularosa, NM 88352
Dear Ramesh Ravella,

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We deserve clean water and to breathe easier. Thank you.

Regards,
Eileen Juric
511 Adams St
Raleigh, NC 27605
Attached
Regarding: NC DEC Public Meeting on Digester System General Permits (virtual) for swine, cattle, and chicken animal feeding operations, April 21, 2022

I was no able to testify because the reverberation on the microphone which I couldn't figure out how to stop. Therefore I am submitting these written comments.

I support in both letter and spirit the comments of Jeri Gray, Emily I. Keel, Kay Reibold, Lib Hutchby, Nicole Gaines, Larry Baldwin, Elizabeth Whiting, Samantha Krop, Danielle Koonce, Bryant Madison, Rebecca Drohan, Shelby Cline, Amanda Strawderman, and Cathy Buckley.

Comment by Tim Holder, 7601 Quail Woods Rd, Wilmington NC 28411, 571-346-9758
Dear Ramesh Ravella,

Industrial hog operations are making North Carolinians sick and can lead to premature death. You can help.

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Please incorporate commonsense protections for our water, air, and people into the biogas general permit. This includes, at a minimum, stronger requirements to prevent pollution from industrial hog operations and robust monitoring to ensure compliance.

We deserve clean water and to breathe easier. Thank you.

Regards,
Elsa Petersen
2560 Judge Fran Jamieson Way
Melbourne, FL 32940
Dear Ramesh Ravella,

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Please incorporate commonsense protections for our water, air, and people into the biogas general permit. This includes, at a minimum, stronger requirements to prevent pollution from industrial hog operations and robust monitoring to ensure compliance.

We deserve clean water and to breathe easier. Thank you.

Regards,
John Phillips
14540 Fairfax Pl
Davie, FL 33325
To the North Carolina Department of Environmental Quality Division of Water Resources,

Thank you for hosting a series of public meetings regarding the Digester System General Permits. I was able to attend the virtual meeting this evening and it was very insightful to hear the range of arguments. One commonality across comments that really struck me was the shared desire to do what is best for the communities of North Carolina.

For historically marginalized communities in places such as Sampson and Duplin counties, one resounding sentiment is a desire to eliminate the antiquated lagoon and sprayfield waste management systems that have long been proven to be harmful for the environment and public health. They are not necessarily opposed to the industry itself, but rather the pursuit to capitalize on the lagoon and sprayfield system for further profit, which merely perpetuates and exacerbates the demand for this system to continue. For factory farmers and the stakeholders within the hog industry, their comments evoked aspirations to innovatively mitigate climate change by reducing methane emissions from CAFO operations through anaerobic digesters. With that sentiment in mind, I am shocked to hear these same people call for removal of “tedious” monitoring protocols to ensure that their operations comply with regulations that seek to protect water and air quality and surrounding communities. If their argument in favor of biogas production is to truly enhance communities, then it seems like a no-brainer that they would favor stipulations in the General Permit that ensure their farms are in compliance with measures that enforce protections and promote cleaner operations.

With that said, this is a pivotal moment for a transition to clean energy in this country. We know for a fact that biofuel is not a truly renewable resource and that the proposal to pipe methane for processing poses additional risks to communities who already bear the burden of polluting industries. We have also seen the negative impacts from such operations in places like Colorado and Nebraska, and it would be foolish not to consider those lessons. We also know that biogas is more expensive than renewable energy sources such as wind and solar and that the cost will simply shift to utility customers... And at the end of the day, those living in the path of these destructive industries will pay the ultimate price for this thoroughly greenwashed approach through increased health problems and decreased quality of life. If we are truly going to strive for an equitable and just transition to clean energy to mitigate climate change without causing further harm to the environment and communities, it is essential that we center the voices and experiences of those who have been dealing with the fallout of industrial agriculture for decades and who will be most impacted by the issues that inevitably arise from biogas production.

At the minimum, I urge you to modify the General Permit to include commonsense requirements such as utilization of environmentally superior technology, compliance with air and water quality monitoring protocols, and increased reporting, transparency, and public engagement. At a maximum, please revoke the General Permit entirely and focus on rectifying the primitive lagoon and sprayfield system once and for all.

Governor Cooper, NC DEQ, Smithfield, industry stakeholders, and factory farmers alike are quick to espouse values about economic development, environmental sustainability, and community wellbeing, and it is time that they collectively step up and creatively collaborate with those most impacted by their decisions to honestly live up to those values and do what is truly best for ALL North Carolinians.

Sincerely,
Taylor West
My name is Carolyn Pilgrim; I'm a member of the North Carolina Sierra Club and I represent over 66,000 members and supporters statewide who believe in environmental justice, climate action, and an equitable transition to clean energy. Thank you for the opportunity to express my thoughts today.

I ask DEQ to include the following in the biogas general permit:

* Monitoring provisions in the permit that effectively evaluate the impacts of biogas operations on the environment and public health. Since the general permit is intended to protect water quality, groundwater monitoring and surface water monitoring is critical to ensure compliance with the "nondischarge" requirement.
* A requirement that environmentally superior technology be used to dispose of hog waste
* Stronger requirements for preventing leaks and overflow
* Robust and transparent monitoring requirements to ensure compliance.

Biogas is being greenwashed by industry to disguise what it really is: the perpetuation of an outdated, inefficient, and irresponsible method of waste management. The truth is that biogas from industrial hog operations isn't clean and it isn't climate friendly. This general permit must include robust protections for water, air and communities.

I'm concerned about the environmental impacts of biogas AND the health and safety of people who live near CAFOs; innocent people who continue to be harmed by the antiquated lagoon and sprayfield waste systems still in use at these facilities.

I'm worried about the growth of biogas in communities that are already suffering from pollution from industrial agriculture and I implore DEQ to ensure that the general permit includes protections for these communities and for our environment.

Thank you,

Carolyn Pilgrim
Waynesville, NC
The current lagoon and sprayfield system for hog waste is outdated, pollutes the environment, creates a nuisance for nearby neighbors, robs them of use of their property, and causes public health problems. NCDEQ to apply protective measures for these digesters to ensure these issues won't become worse.

Karen Mallam
Siler City, NC.

Sent with ProtonMail secure email.
Dear DEQ:
I write to submit comments on the proposed permit to capture hog-waste methane emissions. **I oppose the permitting of a biogas permit for capturing hog waste methane emissions in Duplin, Iredell and Sampson counties.** Although it sounds like a positive step, it is actually a POLLUTION-ENHANCING technology that furthers the presence of environmentally destructive large-scale hog farms in Eastern North Carolina. These hog farms are major polluters of air, water and soil, and are disproportionately located near communities of color. Please do NOT promote unsustainable farming practices by enabling the greenwashing of methane capture.

**I urge you to REJECT biogas permits for capturing hog waste methane emissions.**

Thank you for your time and consideration,

Sincerely,

Hope J Shand
915 Virgie St
Durham NC 27705
Dear NC Department of Environmental Quality,

Industrial hog operations are making North Carolinians sick and can lead to premature death. You can help.

A fast-tracked, cookie-cutter permit for the facilities that continue to put Black, Latino, and Indigenous families at disproportionate risk is not the answer. We want better biogas solutions that are already reducing pollution and harm to communities in other states.

Please incorporate commonsense protections for our water, air, and people into the biogas general permit. This includes, at a minimum, stronger requirements to prevent cumulative impacts from pollution sources such as concentrated animal operations, coal plants, and other industrial emission sources. Compliance assurance is also critical and must include robust monitoring.

We hope DEQ will be innovative and use every tool available to support North Carolina’s agricultural sector, prevent pollution, and protect environmentally impacted communities.

We all deserve clean water and to breathe easier. Thank you.

Sincerely,
Andrew Whelan
710A Greenwood Rd
Chapel Hill, NC 27514
We support covered secondary lagoons, injection of waste in soil rather than spray and more rapid reporting of major spills, cleaner technology to control biogas production and better groundwater and surface water monitoring data at every hog facility as well as monitoring of wells of those who live near them.

Basically we support all of the detailed comments submitted by the Environmental Justice and Equity Advisory Board for DEQ submitted back in October to the DEQ Secretary.

Raoul and Priscilla Rebillard  
Wilmington, NC
Dear DWR,

I'm writing to make a public comment on the general biogas permits being drafted for swine, cattle, and poultry waste. I would prefer no such general biogas permits existed at all. I think all proposals for biogas digesters should be subject to a special permit process and public comment. The meat industry in North Carolina has proven too untrustworthy, too unconcerned with public health, to be trusted with a general permitting process. These permits should be issued on a case by case basis if at all.

The permits contain a great many rules for protecting nearby ecosystems and communities (laudable). Unfortunately, these rules strike me as easy to break (for instance, by applying manure right before a rainstorm or when the ground is frozen) and hard to enforce (how many employees does the DEQ plan to hire to monitor these permits?). Given the meat industries' track record in the region, a general permit just seems like a very bad idea.

If there is to be a permit system (and I don't think there should be) inspections need to happen more frequently than currently stipulated. Rain gauges should be checked more regularly than every 5 years given how many other decisions depend upon them. Also, all record keeping should be digitized. All the records and documentation which farms are required to keep--regarding discharges, waste levels, waste chemistry, etc.--should be filed online, so that the DEQ can seem immediately if the farmer has failed to update some or any portion of the required documents. These should be available online so that some intern or even a bot can continuously monitor their submission and consistency and flag problem areas. The safety (if it is at all possible) of these systems depends on their being excellently maintained. The DEQ needs real time updates on the state of these facilities' upkeep. These documents should be available to the public for ongoing review. Neighbors should be able to read a local facilities report card in a way that is similar to the safety reports of restaurants.

Many thanks,
Elizabeth Whiting Pierce

--
Elizabeth Whiting Pierce, Ph.D.
Director of Interdisciplinary and Engaged Learning in the Professional Schools Program for Leadership and Character
Wake Forest University
She/Her/Hers
To the NC Division of Water Resources /Animal Feeding Operations:

Joshua Hardison,Burgaw N.C.

I support North Carolina’s pork industry and those who want to reduce greenhouse gas emissions by generating renewable natural gas on hog farms. As you finalize the Animal Waste Management Digester System General Permit, I urge you to develop a practical permit that encourages the use of biogas on North Carolina farms in a safe and effective manner.

With more than 2,000 permitted hog farms across the state, the use of digester systems has the proven ability to provide substantial benefits, including the generation of a significant amount of renewable natural gas. The EPA’s AgSTAR program touts the benefits of digester systems that enable farmers to capture methane gases, and North Carolina’s Clean Energy Plan highlights the state’s potential to produce biogas.

The draft permit maintains the state’s stringent water quality standards and appropriately includes an on-site inspection of all digester systems before they begin operations. These safeguards will ensure that digester systems are safe and effective in reducing harmful emissions.

The opposition to digester systems is largely based on issues that are completely unrelated to the capture of methane gases and the production of renewable natural gas. These arguments should not impact the drafting of the Animal Waste Management Digester System General Permits.

North Carolina’s swine farmers have a long history of supporting our rural communities, growing our economy, and feeding our families. The use of digester systems is another valuable opportunity for farmers to protect our neighbors and our environment.

Thank you for your consideration.
To the NC Division of Water Resources /Animal Feeding Operations:

I support generating renewable natural gas on hog farms and I urge you to develop a practical permit that encourages the use of biogas on North Carolina farms.

The draft permit maintains the state’s stringent water quality standards and appropriately includes an on-site inspection of all digester systems before they begin operations. These safeguards will ensure that digester systems are safe and effective in reducing harmful emissions.

The opposition to digester systems is largely based on issues that are completely unrelated to the capture of methane gases and the production of renewable natural gas. These arguments should not impact the drafting of the Animal Waste Management Digester System General Permits.

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Thank you for your consideration,

Jennifer Kendrick
Raleigh NC
CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

To the NC Division of Water Resources /Animal Feeding Operations:

From: John Sargent, Clinton, North Carolina:

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The opposition to digester systems is largely based on issues that are completely unrelated to the capture of methane gases and the production of renewable natural gas. These arguments should not impact the drafting of the Animal Waste Management Digester System General Permits.

North Carolina’s swine farmers have a long history of supporting our rural communities, growing our economy, and feeding our families. The use of digester systems is another valuable opportunity for farmers to protect our neighbors and our environment.

Thank you for your consideration.
Dear Good People,

I am very concerned about the dangers posed by methane, which is a greenhouse gas that will hasten climate change. To send this "biogas" through a low-tech series of pipes, and then spray the hog waste onto fields is dangerous to people living nearby, and when the hog waste is held in unlined lagoons, it can leach out into the groundwater and provide an even more dangerous environment for those living nearby.

We should be promoting renewable energy solutions like solar, wind and wave power, or hydropower, and finding a better way to store hog waste and regulate that industry more sensibly. Climate Change is the worst thing that is happening in the world, and will make the lives of our grandchildren far more difficult, and the world far less livable.

Thank you so much for your service. We are depending on you for sensible leadership in this challenge.

Lorna Chafe
member, Women's International League for Peace and Freedom
I would like to comment on the use of general permits for digesters on industrial farms. We unquestionably do not need to increase the production of methane by covering waste lagoons thus converting them to digesters. Being the horrendous greenhouse gas that it is, methane produced in such a covered waste pit and then piped to a facility miles away is a danger to the atmosphere and the safety of all nearby. Pipes leak and methane is highly flammable as well as destructive of our atmosphere. A number of leaks, which is likely, will completely negate any of the “proposed” climate benefits that energy companies suggest. It is shocking to think that methane is not regulated under law so I foresee that any leakage is not going to be considered a problem to the energy company. We must move away from directed biogas due to multiple hazards and towards true renewable energy sources such as wind and solar. There have been promises made in the past to find cleaner technology to deal with the huge magnitude of waste created by factory farms but the cost was said to be too great. Tremendous money is going into the processing of methane and piping of gas around the state which is just further entrenching this process that puts community members in proximity in grave danger of health problems and social disruption. Please do not allow this use of digesters and piping the extracted methane to continue and put so many at risk.
-----Original Message-----
From: Jane Brewer <brewfarm525@yahoo.com>
Sent: Friday, April 8, 2022 8:04 AM
To: SVC_DENR.DAQ.publiccomments <DAQ.publiccomments@ncdenr.gov>
Subject: [External] General Permit for Biogas

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.<mailto:report.spam@nc.gov>

To the NC Division of Water Resources /Animal Feeding Operations:

From: Ronnie Brewer, Clinton, NC:

I support North Carolina’s pork industry and those who want to reduce greenhouse gas emissions by generating renewable natural gas on hog farms. As you finalize the Animal Waste Management Digester System General Permit, I urge you to develop a practical permit that encourages the use of biogas on North Carolina farms in a safe and effective manner.

With more than 2,000 permitted hog farms across the state, the use of digester systems has the proven ability to provide substantial benefits, including the generation of a significant amount of renewable natural gas. The EPA’s AgSTAR program touts the benefits of digester systems that enable farmers to capture methane gases, and North Carolina’s Clean Energy Plan highlights the state’s potential to produce biogas.

The draft permit maintains the state’s stringent water quality standards and appropriately includes an on-site inspection of all digester systems before they begin operations. These safeguards will ensure that digester systems are safe and effective in reducing harmful emissions.

The opposition to digester systems is largely based on issues that are completely unrelated to the capture of methane gases and the production of renewable natural gas. These arguments should not impact the drafting of the Animal Waste Management Digester System General Permits.

North Carolina’s swine farmers have a long history of supporting our rural communities, growing our economy, and feeding our families. The use of digester systems is another valuable opportunity for farmers to protect our neighbors and our environment.

Thank you for your consideration.

Sent from my iPhone
To the NC Division of Water Resources /Animal Feeding Operations:

From: Jane Brewer, Clinton, NC:

I support North Carolina’s pork industry and those who want to reduce greenhouse gas emissions by generating renewable natural gas on hog farms. As you finalize the Animal Waste Management Digester System General Permit, I urge you to develop a practical permit that encourages the use of biogas on North Carolina farms in a safe and effective manner.

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Thank you for your consideration.

Sent from my iPhone

-----Original Message-----
From: Jane Brewer <brewfarm525@yahoo.com>
Sent: Friday, April 8, 2022 8:02 AM
To: SVC_DENR.DAQ.publiccomments <DAQ.publiccomments@ncdenr.gov>
Subject: [External] General Permit for Biogas

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.<mailto:report.spam@nc.gov>
From: Robin Seitz <robinseitz@rocketmail.com>
Sent: Thursday, April 7, 2022 8:06 PM
To: SVC_DENR.DAQ.publiccomments <DAQ.publiccomments@ncdenr.gov>
Subject: [External] General Permit for Biogas

To the NC Division of Water Resources /Animal Feeding Operations: From:Robin Seitz, Pender County NC

To support North Carolina’s pork industry and those who want to reduce greenhouse gas emissions by generating renewable natural gas on hog farms, I urge you to develop a practical permit that encourages the use of biogas on North Carolina farms in a safe and effective manner. With more than 2,000 permitted hog farms across the state, the use of digester systems has the proven ability to provide substantial benefits, including the generation of a significant amount of renewable natural gas. The EPA’s AgSTAR program touts the benefits of digester systems that enable farmers to capture methane gases, and North Carolina’s Clean Energy Plan highlights the state’s potential to produce biogas. The draft permit maintains the state’s stringent water quality standards and appropriately includes an on-site inspection of all digester systems before they begin operations. These safeguards will ensure that digester systems are safe and effective in reducing harmful emissions. The opposition to digester systems is largely based on issues that are completely unrelated to the capture of methane gases and the production of renewable natural gas. These arguments should not impact the drafting of the Animal Waste Management Digester System General Permits. North Carolina’s swine farmers have a long history of supporting our rural communities, growing our economy, and feeding our families. The use of digester systems is another valuable opportunity for farmers to protect our neighbors and our environment. Thank you for your consideration.

Robin Seitz
Pender County NC
From: JEFF RUSS <phillipjruss@embarqmail.com>
Sent: Thursday, April 7, 2022 7:12 PM
To: SVC_DENR.DAQ.publiccomments <DAQ.publiccomments@ncdenr.gov>
Subject: [External] General Permit for Biogas

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

To the NC Division of Water Resources /Animal Feeding Operations: From:Your Name, City, State: I support North Carolina’s pork industry and those who want to reduce greenhouse gas emissions by generating renewable natural gas on hog farms. As you finalize the Animal Waste Management Digester System General Permit, I urge you to develop a practical permit that encourages the use of biogas on North Carolina farms in a safe and effective manner. With more than 2,000 permitted hog farms across the state, the use of digester systems has the proven ability to provide substantial benefits, including the generation of a significant amount of renewable natural gas. The EPA’s AgSTAR program touts the benefits of digester systems that enable farmers to capture methane gases, and North Carolina’s Clean Energy Plan highlights the state’s potential to produce biogas. The draft permit maintains the state’s stringent water quality standards and appropriately includes an on-site inspection of all digester systems before they begin operations. These safeguards will ensure that digester systems are safe and effective in reducing harmful emissions. The opposition to digester systems is largely based on issues that are completely unrelated to the capture of methane gases and the production of renewable natural gas. These arguments should not impact the drafting of the Animal Waste Management Digester System General Permits. North Carolina’s swine farmers have a long history of supporting our rural communities, growing our economy, and feeding our families. The use of digester systems is another valuable opportunity for farmers to protect our neighbors and our environment. Thank you for your consideration.
From: Geno Kennedy <agrimentservices@yahoo.com>
Sent: Friday, April 8, 2022 8:09 AM
To: Lawson, Christine <Christine.Lawson@ncdenr.gov>
Subject: [External] comments

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

Christine,

these were some of my generic comments last night. I did not get the email to submit them so if you could please forward to the proper email these comments below. thx

My name is Geno Kennedy. I am a certified technical specialist and hold certifications/designations in most all aspects of manure management including monitoring, sampling, and land application. I am president of operations for Agriment Services, a waste management consulting company with over 400 clients, most of which are swine operations. I have worked in this industry for over 28 years.

Methane digesters on farms is well-understood. It is not a new technology. As DEQ knows, it is a safe, effective and proven way to capture methane gases, reduce greenhouse gas emissions, and produce renewable energy.

The digestion process converts the nutrients from swine manure into a form that is more accessible for plants, which results in increased crop productivity and yield.
Methane digesters also significantly decrease on-farm odor. Not only is the anerobic breakdown of the manure happening under a cover, once that manure flows into a secondary storage pond, the digested manure is biologically stable, which means the manure can be stored and land applied with less odor. Some studies have shown odor reductions by as much as 85% in digested manure. You must realize that the investments being made is taking one of the most heated discussions in the past related to odor and turning this odor into renewable energy in the biological process odor is lost. Major past issue being solved by this biological process is ironic but acceptable.

When opponents talk about digester projects having a negative impact on the community, it makes me think that they do not fully understand or appreciate the beneficial biological changes that are happening with the addition of a lagoon cover. I would encourage them to make a greater effort to understand these systems before speaking out against them.

I also believe that some folks are confused about the nitrogen cycle and believe that somehow there is more nitrogen created in a methane digester. This would obviously be biologically impossible.

As other technical specialists have already mentioned, there are a few minor changes that would improve the current permit draft. I urge DEQ to consider making those changes to the final permit.

With Kind Regards,
Ronnie "Geno" Kennedy Jr.
President of Operations
Agriment Services, Inc.
PO Box 1096 Beulaville, NC 28518
Office (252)568-2648 Fax (252)568-2750 Mobile (910)289-0395
This electronic message contains information generated by Agriment Services Inc. and is solely for the intended recipients. Any unauthorized interception of this message or the use or disclosure of the information it contains may violate the law and subject the violator to civil or criminal penalties. If you believe you have received this message in error, please notify the sender and delete the email immediately.
US PUBLIC COMMENT NCDEQ-DWR,

The draft general permit for industrial hog facilities producing biogas does not provide enough protection from pollution.

It is the responsibility of the North Carolina Department of Environmental Quality to ensure any permits issued are protective of our resources and communities. We know that just because a permit is in place, does not mean it prevents pollution, and the draft general permit is not much more robust than the current general permit for swine facilities. Stronger requirements for water-quality sampling must be included in the general permit to ensure these facilities are not discharging waste into our waterways.

The draft permit also needs to be more selective in which facilities are eligible to apply for coverage: facilities with a history of violations, that are not abiding by the current permit, should not be eligible to be covered by this permit.

Thank you for your consideration,

Frank Johnston
surfdingking@gmail.com
700 Northgate Drive
Washington , North Carolina 27889
US PUBLIC COMMENT NCDEQ-DWR,

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Thank you for your consideration,

Sterling Bowen
wildstar74@gmail.com
109 N King Charles Rd
Raleigh, North Carolina 27610
Please see the attached comments sent to the DAQ public comment email inbox regarding the general biogas permit.

Thanks,
Shawn

Shawn Taylor, he/him
Public Information Officer, Division of Air Quality
Good Morning,

I would like to formally submit public comment on the campaign for Biogas as a “solution” to the damage CAFOS and hog farms cause to the environment. I do not support them. They are greenwashing at its finest. It will not improve water quality conditions, it will likely make things worse. The only thing it will do is allow hog farms to continue making money while degrading the environment we all live in. These should not be publicly funded or allowed in general. There has to be a better way.

Sarah Brazil
Please do not make biogas an option for the pig farms--it causes more environmental problems!

--

Regards, Tom Riggins
Dear Ramesh Ravella,

Industrial hog operations are making North Carolinians sick and can lead to premature death. You can help.

A fast-tracked, cookie-cutter permit for the facilities that continue to put Black, Latino, and Indigenous families at disproportionate risk is not the answer. We want better biogas solutions that are already reducing pollution and harm to communities in other states.

Please incorporate commonsense protections for our water, air, and people into the biogas general permit. This includes, at a minimum, stronger requirements to prevent pollution from industrial hog operations and robust monitoring to ensure compliance.

We deserve clean water and to breathe easier. Thank you.

Regards,
Aurelie Ward
1409 Forest Park Dr
Statesville, NC 28677
Dear Ramesh Ravella,

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Regards,
Iris Carman
327 Lakewood Dr
Wilkesboro, NC 28697
Dear Ramesh Ravella,

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Regards,
Catherine Sims
1021 Red Hat Ln
Durham, NC 27713
CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.

-----Original Message-----
From: Jimmy <kegreene@ncgrange.com>
Sent: Monday, April 4, 2022 2:26 PM
To: Jimmy <jwgentry@ncgrange.com>
Subject: Message from "RNP002673E3F05F"

This E-mail was sent from "RNP002673E3F05F" (MP C4504ex).

Scan Date: 04.04.2022 14:26:15 (-0400)
Dear Ramesh Ravella,

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We deserve clean water and to breathe easier. Thank you.

Regards,
Jude Pasqualini
354 Davis Creek Rd
Candler, NC 28715
Dear Ramesh Ravella,

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We deserve clean water and to breathe easier. Thank you.

Regards,
Eileen Juric
511 Adams St
Raleigh, NC 27605
To whom it may concern,

I’m weighing in on the issue of hog waste and other livestock waste that contaminates our water and especially hurts communities and neighbors near these disposal areas. Let’s have vision and realize that what is not handled well now will lead to a bigger problem of clean up later and a general reduction of quality of life for all of us. It’s like when you leave a house in disrepair. Eventually, and usually sooner than you think, you have to make a huge investment all at once or even have to tear the structure down. NCDEQ needs to apply protective measures for these digesters to ensure these issues won’t become worse. It hurts a little now to address this issue but it will hurt a lot more later.

Thank you for hearing my opinion and considering my desire to protect our beautiful state and keep it that way.

Sincerely,

Shirley Galbrecht
Here in North Carolina, and in the Cape Fare River basin specifically, we have the highest concentration of pig factory farms that pose a grave environmental threat. The manure from mass scale pig factories is enormous and the waste cannot be absorbed by the land and instead it runs off into waterways and creates serious pollution. I am aware that the factory farming industry is proposing biogas as a so-called solution to this problem. However, this is NOT a viable solution. Scientists are clear that biogas is likely to make water quality even worse, while generating even more profit for factory farms. I urge you to NOT side with the factory farming industry, Instead please stand against biogas.

Tracey Laszloffy, PhD
4414 Worthylake Run
Wilmington, NC 28412
As a salesperson for a North Carolina printing company back in the late 1980’s and early 1990’s I printed a brochure touting the New, Amazing Hog Waste System of Lagoons for dealing with hog waste . . . a memory I don’t cherish now.

PLEASE, strengthen the permit process and require hog production corporations to pay their fair share of the danger and cost of poisoning our waterways. Remember Flood Floyd? WATER Is the new oil - a dwindling resource VITAL to sustaining life on this planet. Don’t be short sighted. We must have the tools to adjust for coming unpredictable conditions with the weather, climate and human conditions.

Do not approve a general permit. It is a shortcut that allows regulatory approval of any project which meets a set of general standards, without a case-by-case review of other circumstances or potential problems. North Carolinians NEED CASE-BY-CASE-REVIEW.

In essence, this mandate gives an official blessing to the retention of liquid waste lagoons which are fitted with a system for collecting the methane gas generated by the decaying hog waste. Strategically, it is intended to JUMP-START a market for captured methane from hog waste THAT DOES NOT NOW EXIST. It’s an economic BOON for the BIG hog production CORPORATIONS, NOT INDIVIDUAL FARMERS. It has also been portrayed as a way to reduce greenhouse gas emissions, but it does nothing to address the severe pollution threat to nearby communities’ air and groundwater. IT STYMIES AND PREVENTS A TRANSITION TO RESTORATIVE AGRICULTURE.

Environmental advocates vigorously opposed the change, and expressed disappointment that it was passed by the legislature and signed into law by the governor. Among them was the Southern Environmental Law Center (SELC), which pointed out the adverse impacts of continuing the lagoon and spray-field system “are disproportionately borne by Black, Latino, and Native American families in eastern North Carolina.”

Thank you,

Cheryl McGraw
Raleigh
US PUBLIC COMMENT NCDEQ-DWR,

The draft general permit for industrial hog facilities producing biogas does not provide enough protection from pollution.

It is the responsibility of the North Carolina Department of Environmental Quality to ensure any permits issued are protective of our resources and communities. We know that just because a permit is in place, does not mean it prevents pollution, and the draft general permit is not much more robust than the current general permit for swine facilities. Stronger requirements for water-quality sampling must be included in the general permit to ensure these facilities are not discharging waste into our waterways.

The draft permit also needs to be more selective in which facilities are eligible to apply for coverage: facilities with a history of violations, that are not abiding by the current permit, should not be eligible to be covered by this permit.

Thank you for your consideration,

Frank Johnston
surfdingking@gmail.com
700 Northgate Drive
Washington, North Carolina 27889
Greetings, I will submit that NC has a real image and pollution problem with Industrial pork production.

This method of pig farming is dirty and cruel. As a hotel owner on The Outer Banks I am against it.

The situation is giving NC a bad name.

Sincerely, Greg Hamby, Owner of The Cypress Moon Inn, Kitty Hawk NC
US PUBLIC COMMENT NCDEQ-DWR,

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Thank you for your consideration,

Jack Hollingsworth
marjack5lori@gmail.com
5 Lori Ln
Oriental, North Carolina 28571-9705
US PUBLIC COMMENT NCDEQ-DWR,

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It is the responsibility of the North Carolina Department of Environmental Quality to ensure any permits issued are protective of our resources and communities. We know that just because a permit is in place, does not mean it prevents pollution, and the draft general permit is not much more robust than the current general permit for swine facilities. Stronger requirements for water-quality sampling must be included in the general permit to ensure these facilities are not discharging waste into our waterways.

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Thank you for your consideration,

Laura Rastl
laura.rastl0@gmail.com
127A Cathleen Way
Southern Pines, North Carolina 28387
Dear Animal Feeding Operations,

The industrial hog industry in North Carolina has gone to great lengths to avoid its responsibility to the environment and to the communities that surround its farms. The general permit for biogas could be another opportunity for the industry to slide past its legal and moral obligations if we fail to hold these facilities to the highest standards.

A one-size-fits-all permit for the facilities that continue to put Black, Latino, and Indigenous families at disproportionate risk is not the answer. We want better biogas solutions, such as those that are reducing pollution and harm to communities in other states.

We ask that commonsense protections are incorporated into the general permit for the health of our water, air, and people. This includes, at a minimum, stronger requirements to prevent pollution from industrial hog operations, along with robust monitoring and transparent data-sharing to ensure compliance.

You have the opportunity to help all North Carolinians experience cleaner air and water. Please make the biogas general permit as protective as possible.

Sincerely,

Billie Anderson
3011 Eastburn Road
Charlotte, NC 28210
billiemayanderson@gmail.com
(980) 579-9453

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with NC Sierra Club. If you need more information, please contact Margaret Lillard at NC Sierra Club at margaret.lillard@sierraclub.org or (919) 833-8467.
US PUBLIC COMMENT NCDEQ-DWR,

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Thank you for your consideration,

Doris Jackson
djiva528@gmail.com
5405 Wheatcross Pl
Raleigh, North Carolina 27610
US PUBLIC COMMENT NCDEQ-DWR,

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Thank you for your consideration,

Michelle Trajanovska
malny07@yahoo.com
3813 Woodridge Court
Clayton, North Carolina 27520
US PUBLIC COMMENT NCDEQ-DWR,

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Thank you for your consideration,

Robert Harris
ebb4@bellsouth.net
1201 Ebb Court
Raleigh, NC, North Carolina 27615
US PUBLIC COMMENT NCDEQ-DWR,

The draft general permit for industrial hog facilities producing biogas does not provide enough protection from pollution, esp. as it seems business as usual regarding open lagoons and spraying of fields. Citizens will seem to have less of a say than they do now in how to protect themselves from harm. Moreover, these operations most heavily affect people with the fewest resources to defend themselves. Why must the poorest be chosen to sacrifice for the greater good? And the sacrifice is their most precious possession: their health!

The North Carolina Department of Environmental Quality is charged with ensuring any permits issued are protective of our resources and communities. Clearly, just because a permit is in place, does not mean it prevents pollution, and the draft general permit is not much more robust than the current general permit for swine facilities. Stronger requirements for water-quality sampling and enforcement must be included in the general permit to ensure these facilities are not discharging waste into our waterways.

The draft permit also needs to be more selective in which facilities are eligible to apply for coverage: facilities with a history of violations, that are not abiding by the current permit, should not be eligible to be covered by this permit.

Thank you for your consideration,

Carol collins
collinsc@ecu.edu
1311 Fantasia St
Greenville, North Carolina 27858
US PUBLIC COMMENT NCDEQ-DWR,

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Thank you for your consideration,

Ann Tarbet
annmichele00@yahoo.com
7337 Bryn Athyn Way
Raleigh, North Carolina 27615
CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.<mailto:report.spam@nc.gov>

Dear Animal Feeding Operations,

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A one-size-fits-all permit for the facilities that continue to put Black, Latino, and Indigenous families at disproportionate risk is not the answer. We want better biogas solutions, such as those that are reducing pollution and harm to communities in other states.

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You have the opportunity to help all North Carolinians experience cleaner air and water. Please make the biogas general permit as protective as possible.

Sincerely,

Stacey Cannon
1903 Stokes Ferry Rd.
Salisbury, NC 28146
staceycannon1313@gmail.com
(704) 209-1213

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with NC Sierra Club. If you need more information, please contact Margaret Lillard at NC Sierra Club at margaret.lillard@sierraclub.org or (919) 833-8467.
Dear Animal Feeding Operations,

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Sincerely,

DaveyAnne McEvers
1140 12th Street Dr SW
Hickory, NC 28602
damcevers@icloud.com
(941) 587-0784

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Dear Ramesh Ravella,

Industrial hog operations are making North Carolinians sick and can lead to premature death. You can help.

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Please incorporate commonsense protections for our water, air, and people into the biogas general permit. This includes, at a minimum, stronger requirements to prevent pollution from industrial hog operations and robust monitoring to ensure compliance.

We deserve clean water and to breathe easier. Thank you.

Regards,
Charles Russell
2860 N Main St
High Point, NC 27265
CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.<mailto:report.spam@nc.gov>

Dear Animal Feeding Operations,

Protect the Environment, protect Humanity!

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Sincerely,

Tim Mengel
6118 Branson Davis Rd
RANDLEMAN, NC 27317
timzoobo@yahoo.com
(336) 434-5496

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Dear Animal Feeding Operations,

show some courage: put livability ahead of economic interests

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Sincerely,

thomas pridgen
5126 branchview way
Denton, NC 27239
pridgen.t@yahoo.com
(336) 857-9998

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I am opposed to the uniform permitting of the use of digesters on the ponds of animal waste on AFO's. The process of piping gas from animal waste to points for processing is not a renewable energy project. This perpetuates the sprayfield system that has led to life changing injuries to health for employees and community members. The creation of more methane under covered lagoons has even more extensive effects on the air quality than the uncovered ponds. We must have more investment in truly renewable energy sources that do not damage our atmosphere and cause irreversible health problems for communities. There are great strides made in solar and wind energy that are renewable and safe. Let's not give this encouragement to an outdated and dangerous misuse of animal waste.
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Sincerely,

Karen Langelier
3613a Saint Johns Ct
Wilmington, NC 28403
klang4678@gmail.com
(603) 340-6097

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We deserve clean water and to breathe easier. Thank you.

Regards,
Eileen Juric
511 Adams St
Raleigh, NC 27605
Dear Ramesh Ravella,

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Regards,
I. Engle
605 Bosque St
Tularosa, NM 88352
Dear Animal Feeding Operations,

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Sincerely,

Virginia Goldrick
1625 S. 17th St, Apt 245
Wilmington, NC 28401
vmgoldrick@aol.com
(708) 989-9019

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Sincerely,

Carolyn Moore
1022 S Main St
Wake Forest, NC 27587
20daisy09@gmail.com
(919) 302-5188

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Dear Animal Feeding Operations,

Loose hog farm regulations that 'worked' in the past need to be updated to protect the environment for future generations.

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Sincerely,

Richard Burke
220 E Park Dr
Raleigh, NC 27605
rickburke04@gmail.com
(609) 529-3371

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Sincerely,

Adriana Crisan
74 Moser Place
Clayton, NC 27520
moonshine331@aol.com
(561) 542-5662

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Sincerely,

Susane Boukamel  
200 Fox View Pl  
Cary, NC 27511  
stelliboukamel@gmail.com  
(919) 439-2468

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Sincerely,

Marian and Thomas Wenink
1034 Prestwick Court
Clemmons, NC 27012
twenink@email.com
(336) 778-9273

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Sincerely,

Mary Buttitta
411 Periwinkle Drive
Asheville, NC 28804
mary.buttitta@gmail.com
(802) 373-0113

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Sincerely,

Stephen Weissman
8 Oak Ct, Candler, NC 28715
Candler, NC 28715
sweissman4@gmail.com
(828) 255-5206

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Sincerely,

Rosalyn Sloan
751 PROPSTON ST NW
CONCORD, NC 28025
rnrosalyn@gmail.com
(704) 776-8514

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Dear Animal Feeding Operations,

Making use of hog waste to generate power could be a win-win for both farmers and the environment, but only if implemented correctly. Please take the time now to build in needed protections. Be sure that you create a system you would be willing to live next door to. Spend some time in homes bordering farms, so you understand what protection your constituents need. They depend on you.

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Sincerely,

Deborah Norton
5805 Baird Drive
Raleigh, NC 27606
doctordebnorton@earthlink.net
(919) 414-4630

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Sincerely,

Ann Bullock
PO Box 1266
Whittier, NC 28789
akbullock2@gmail.com
(828) 788-4472

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Sincerely,

Laurene Rapoza
125 Glendale drive,
Wilmington, NC 28401
lauenerap@hotmail.com
(910) 232-5713

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Sincerely,

Joe Bearden
1809 Lakepark Drive
Raleigh, NC 27612
chickadeebirders@outlook.com
(919) 844-9050

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Dear Animal Feeding Operations,

The biogas general permit needs better protections for air, water and communities!

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Sincerely,

Catherine Sims
1021 Red Hat Ln
Durham, NC 27713
cassys@vt.edu
(757) 478-1588

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Sincerely,

Fred Stanback
220 Stonewall road
Salisbury, NC 28144
stanbackf@aol.com
(704) 647-1551

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Sincerely,

Ken Bosch
4404 Quail Hollow Dr
Raleigh, NC 27609
ken.bosch.us@gmail.com
(919) 855-0900

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Sincerely,

Joanne Purnell
3060 weatherby ct
Wilmington, NC 28405
rojo@ec.rr.com
(910) 660-8299

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with NC Sierra Club. If you need more information, please contact Margaret Lillard at NC Sierra Club at margaret.lillard@sierraclub.org or (919) 833-8467.
Dear Animal Feeding Operations,

The industrial hog industry in North Carolina has gone to great lengths to avoid its responsibility to the environment and to the communities that surround its farms. The general permit for biogas could be another opportunity for the industry to slide past its legal and moral obligations if we fail to hold these facilities to the highest standards.

A one-size-fits-all permit for the facilities that continue to put Black, Latino, and Indigenous families at disproportionate risk is not the answer. We want better biogas solutions, such as those that are reducing pollution and harm to communities in other states.

We ask that commonsense protections are incorporated into the general permit for the health of our water, air, and people. This includes, at a minimum, stronger requirements to prevent pollution from industrial hog operations, along with robust monitoring and transparent data-sharing to ensure compliance.

You have the opportunity to help all North Carolinians experience cleaner air and water. Please make the biogas general permit as protective as possible.

Sincerely,

George Phillips
1140 Carousel Ln
Hendersonville, NC 28792
nctrack@gmail.com
(999) 999-9999

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CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to Report Spam.<mailto:report.spam@nc.gov>

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Sincerely,

Cynthia Simonds
704 Laurel Ave
Cynthia, NC 28711
cjsimonds4@gmail.com
(540) 525-0489

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Sincerely,

Alyssa Elliott
5022 Wineberry Dr
Durham, NC 27713
alyssaventimiglia@gmail.com
(252) 341-7407

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Sincerely,

Alisa Vargas
Po box 1868
Marion, NC 28752
easter678603@gmail.com
(828) 652-2009

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From: Dawna Knapp (dawna.knapp@sierraclub.org) Sent You a Personal Message
To: SVC_publiccommentsDWR
Subject: [External] Biogas General Permit Comments
Date: Wednesday, March 16, 2022 7:02:27 PM

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Sincerely,

Dawna Knapp
7251 Lillivale Court
Citrus Heights, CA 95621
dawna.knapp@sierraclub.org
(415) 320-2213

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Dear Ramesh Ravella,

The fact of the matter is that poor oversight is the reason why the industrial hog industry has been polluting eastern NC for over three decades. The lack of regulations or regulation enforcement from the fed, state, and your office is because corporate lobbying is extremely effective and NC state legislators are happy to accept a piece of that pie (pie is money in case you didn't understand my metaphor). They do not care that primarily low income POC are poisoned, that waterways are polluted.

Smithfield was ordered to fix this 20 years ago, and they let those faulty lagoons sit there leeching and flooding right up until now, when biogas was cheap enough to outfit and so they could make the biggest returns. I've honestly heard that with best practices biogas can be a great solution for dealing with industrial animal waste. But Smithfield has never given us BEST practices.

It's odd. The residents fund your paychecks, but the state assembly signs them. The legislators may feel threatening to you, but you work for US. Don't fast track the biogas permits. Let residents stay involved, have a chance to comment on each situation. Each farm is different, and it makes sense to be sure that they are outfitting for and intend to uphold the very safest standards to protect all of their neighbors. History tells us this oversight is absolutely necessary.

We need you all to act with integrity and impact.

P.S. Regulate and enforce poultry waste better while you're at it. It's untenable that we can't even track how many farms there are.

Regards,
Alyssa Florwick
2204 Oak Ridge Blvd
Durham, NC 27707
Dear Ramesh Ravella,

Industrial hog operations are making North Carolinians sick and can lead to premature death. You can help.

A fast-tracked, cookie-cutter permit for the facilities that continue to put Black, Latino, and Indigenous families at disproportionate risk is not the answer. We want better biogas solutions that are already reducing pollution and harm to communities in other states.

Please incorporate commonsense protections for our water, air, and people into the biogas general permit. This includes, at a minimum, stronger requirements to prevent pollution from industrial hog operations and robust monitoring to ensure compliance.

We deserve clean water and to breathe easier. Thank you.

Regards,
Catherine Sims
1021 Red Hat Ln
Durham, NC 27713
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Regards,
Patricia Derrough
61 Rolling Hills Rd
Mills River, NC 28759
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Regards,
David Caldwell
540 Belwood-Lawndale Rd
Lawndale, NC 28090
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Regards,
Staris Morgan
101 Oakwood St Apt S
Goldsboro, NC 27530
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Regards,

Elizabeth Hinshaw
1214 Providence Church Rd
Randleman, NC 27317
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Regards,
Rand Lines
1558 Newton Ave SE
Atlanta, GA 30316