

ARE CONSIDERATIONS
MADE FOR THE
NUMBER OF CAFOs
PER SQ MILE AND/OR
POPULATION DENSITY?

JACK O'CONNOR

To: North Carolina Department of Environmental Quality
Assistant Secretary's Office
1601 Mail Service Center
Raleigh, NC 27699-1601

From: Krista Early, Clean Water Advocate, Environment North Carolina

RE: Public Comment Regarding draft Animal Feeding Operations General Permits

Date: February 26, 2019

Hello, my name is Krista Early and I am the Clean Water Advocate for Environment North Carolina. Today I am speaking on behalf of behalf of Environment North Carolina, our more than 200,000 (two hundred thousand) supporters across the state, and also on behalf of the our sister organization, the North Carolina Public Interest Research Group, and their 95,000 (ninety-five thousand) supporters across the state.

As we know, North Carolina is the country's second-biggest producer of hogs. Our state has 9.7 million pigs that produce 10 billion gallons of waste annually. Hog farms in NC are big business with a big influence. We strongly believe that farming operations can run efficiently and profitably without severely impacting public health and our fragile ecosystems; However, adequate permitting processes are necessary to ensure that happens. The industry should not be allowed to use their significant influence in our state to defeat common sense regulations that ensure environmental protections, public safety, transparency, equity, and accountability.

As we recently saw during Hurricanes Michael and Florence, massive meat processing operations and hurricanes don't mix. Because of Hurricane Florence, at least 110 lagoons in the state either released waste into our environment or were at imminent risk of doing so. Those storms resulted in contamination of our waterways which caused huge problems for our ecosystems and public health; problems like algal blooms, mass fish die-offs, and blue baby syndrome.

The permitting process is one of the few tools the public has to ensure these major operations don't become major threats to their health and environment during severe weather incidents.

It is also one of the only protections available to neighbors that suffer injury from living near these hog and poultry operations. NC residents living near large swine operations have elevated risks of disease and death, as documented by peer-reviewed research published in the NC Medical Journal. We also know that Industrial hog operations are disproportionately located near low-wealth communities of color. Two decade of evidence and experience have shown us that there are severe negative impacts associated with these operations, including a Blue Ribbon Commission that found that reliance on sprayfields for waste disposal was 'not prudent'. Despite this, most hog operations still use this primitive waste management system.

Other states, like Arkansas have required massive animal feeding operations to use more sustainable practices - so why not North Carolina? We've been calling on DEQ to update and strengthen outdated standards for animal feeding operations and we're glad to see DEQ has proposed some changes to these permits that are long overdue and necessary. These changes to the draft permit include some positive steps but there is still a long way to go before it equitably and adequately safeguards our environment and health.

DEQ must protect low-wealth communities of color that bear a disproportionate burden from the dangerous pollution that facilities produce. DEQ needs to consider the cumulative effects, public health or environmental impacts of industrial hog operations on nearby residents.

We thank DEQ for encouraging more transparency by proposing that permittees submit important records to the agency. These records will better prepare nearby communities to protect themselves from the risks

of pollution from hog waste. In order to help protect public health and our fragile ecosystems, DEQ should require permittees to electronically submit records documenting how much waste is applied to crop land, cropping, stocking, and soil and lagoon sampling.

Currently, the general permit requires minimal evaluation of the pollution risks - no requirement for monitoring of groundwater, surface water, or air. The proposed permit would require groundwater monitoring for facilities with lagoons in the 100 year floodplain. However, additional groundwater monitoring at a larger set of facilities is critical.

The lagoon and sprayfield system has failed time and again to protect public health and natural resources, and should be replaced with superior technologies—most immediately in the floodplain and near communities of concern. In the interim, automated technology-- including rain breakers, flow meters, rain gauges, lagoon level monitors, and equipment designed to reduce discharge potential-- is widely available and should be required in this draft permit.

Lastly, we want to thank DEQ for holding this hearing today and allowing us to make our concerns heard on this issue that is so important to the a health and well-being of our state. We look forward to submitting more in-depth comments to help the agency fulfil their responsibility of protecting our air, water, water and public health for all of North Carolina's citizens.

Thank you.

Maryland & Virginia

Milk Producers Cooperative Association

I am Jim Howie, Manager of Member Services for Maryland and Virginia Milk Producers Cooperative (MDVA). MDVA markets milk for dairy farmers on the east coast and for 36 dairy farmers in North Carolina. These NC farmers produced over 144,000,000 pounds of milk in 2018 at a value of \$24.8 million. This equated to almost \$100 million in economic activity to the North Carolina economy.

I am here to express my concerns and the concerns of our NC members about the additional requirements proposed by DEQ's draft General Permit for dairy and cattle operations. DEQ already has the most stringent regulatory program in the nation and additional permit conditions are not needed.

Many of the changes to this proposed dairy and cattle permit are because of conditions that are not relevant to dairy and cattle operations. The 2019 dairy and cattle permit language should closely resemble the 2014 permit. There are not issues with the language or regulations in the 2014 permit. Historically DEQ has intentionally made different permits for cattle, swine and wet waste poultry operations because it was recognized that these farming operations are different. DEQ should continue to maintain these distinctions when adopting these new permits.

I must question if the proposed additions of groundwater monitoring, phosphorus land application rates, additional annual reports, lagoon marker surveys, equipment changes, and burdensome additional recordkeeping will protect water quality. The thing that they will do is add several thousand dollars of additional annual operating cost to dairy and cattle farms with no opportunity to collect these funds from the market place.

A few comments on specifics of the proposed rules change;

- DEQ does not have the authority to require Phosphorus Loss Assessment Tool (PLAT) even in the case of high soil phosphorus. Both the General Statute and 2T rules state that Nitrogen is the rate determining element for farms under the State General Permit.
- DEQ has not stated any scientific basis for requiring groundwater monitoring at farms that are in the floodplain or what risk will be evaluated using this information. This and any additional requirement must be based on scientific need.
- The annual reporting requirement is unnecessary and redundant as the same information can be gained during the annual DEQ inspection of every permitted animal waste operation in North Carolina. Required submittal of this information is just additional unnecessary paperwork.
- Condition II.20 of the new proposal would allow DEQ to require a farmer to install new irrigation equipment that would reduce drift potential due to violations. It is already a violation to apply waste outside the land application area. It is also a violation to cause waste to cross property boundaries or enter surface waters. This new requirement is not needed.

I urge you to abide by the General Statute and current rulings. These proposed rules changes, with respect to dairy and cattle operations, are out of the scope of both. They are unnecessary and burdensome on an industry that is in the midst of one of the worst economic crises in history.

Thank you for the opportunity to address these issues.

Feb. 19, 2019

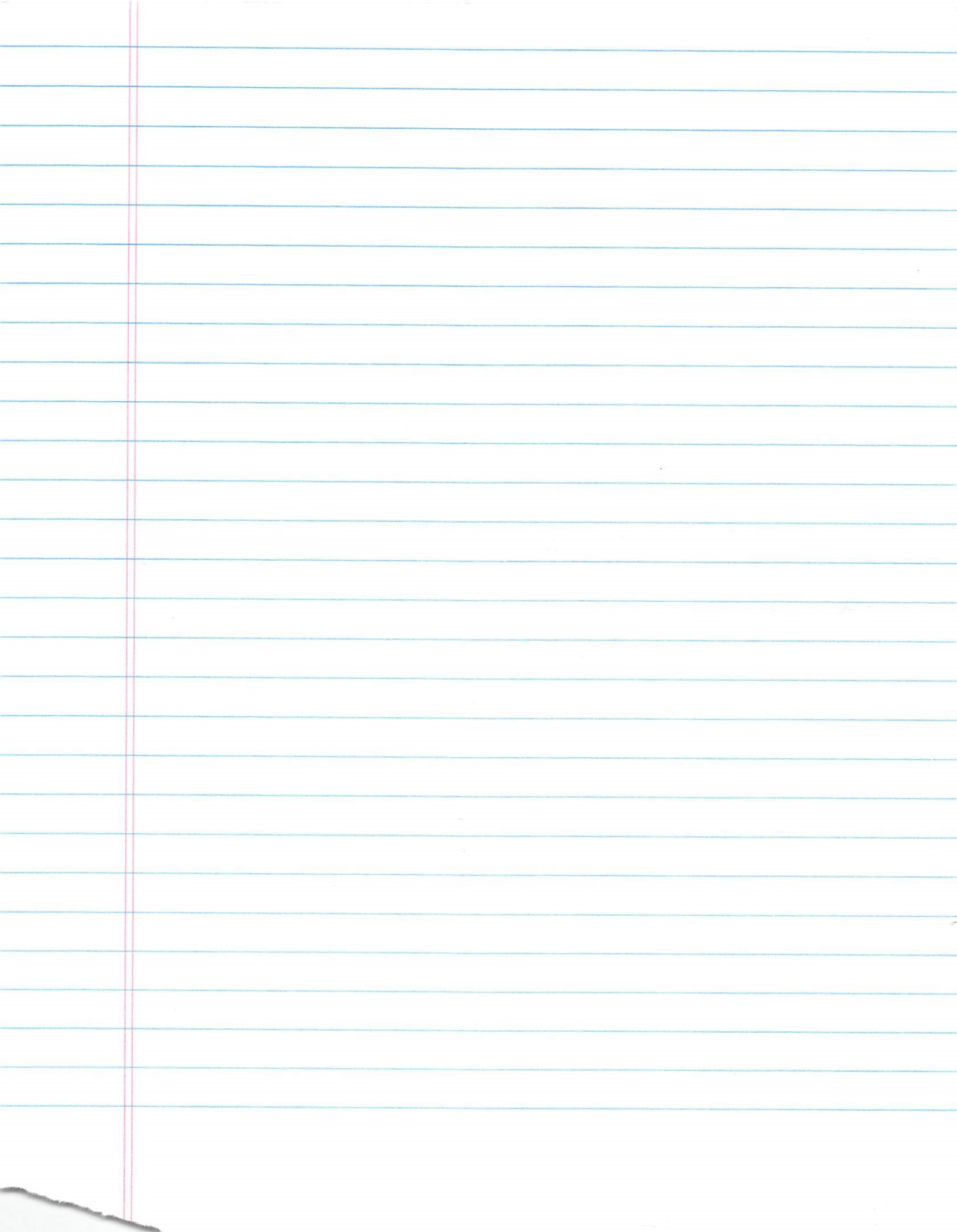
My Name is Wanda Wilson,
I live at 1800 Woodyard Rd,
Riegelwood NC 28456

I live across from Owens Farm have
Breathing issues, A lung disorder
I cannot open my windows in
the summer because of the
smell. I cannot enjoy my
property and my family
cannot enjoy the outside
because of the odor and smell.
Have a skin disorder Rashes on various
areas of body

Wanda Wilson

Reference to the

Owens Farm
located off Hwy 87



DEQ Public Hearing, February 19, 2019, James Sprunt Community College

Animal Feeding Operations General Permit That Governs Waste Management Of Concentrated
Animal Feeding Operations

Good Evening. My name is Sue-Ann Rush and I live at 1060 Stonebridge Lane in Leland, NC. I have been amazed that the concentration of CAFO's containing 10 million hogs is right here in Eastern North Carolina, while the human population of approximately the same number, 10.27 million as of 2017 is spread over the entire state.

I have lived in NC since 2004 and have been following the environment issues for the Cape Fear Water Shed ever since. I have attended numerous symposiums, presentations by environmentalists, college professors, and even politicians. I have read numerous published articles, researched websites etc. Actually, most of the information is pretty forthright and all avenues seem to agree that the permitting is very lax and needs to be strengthened for the benefit of not only the animals' health and wellbeing, but for human health and wellbeing. No need to repeat all the statistics, reports etc. as I am sure you know much more than I do.

Municipalities at the mouth of the river are being forced to upgrade their systems in order to accommodate all of the CAFO's pollution and emerging contaminants to be filtered out. Rate payers are having to pay increasing amounts in their water bill through no fault of the municipality. Why isn't technology required to manage hog waste and reduce air, water and soil pollution. Technology would do much to prevent the pollution that comes from overspraying empty fields, which are very close to their neighbors, and from lagoon leaks into the rivers and streams. Why should the neighbors, and those of us who live downstream deal with the stench and health issues the hog farms create. Better yet, make them accountable to the municipalities by paying their share of the filtering systems chosen or possibly all of the upgrade amounts.

I really just have a question. What would you do if your neighbor was on septic and when it overflowed, they would use the liquid (waste and urine) to irrigate your yard?

1. Hi my name is Nancy. Thank you for the opportunity to speak to you today.
2. I'm concerned about this issue because I love animals and I ~~hate~~ ^{care about} the way they are being raised in high density confinement, unnaturally and no access to the natural land. Because of the way they are raised ~~the~~ it creates these waste pools which would not normally occur of pasture pigs. These pools of waste pollute everything around them. Living in Wilmington, I don't have to be next to a ^{mess} farm but my water is still affected and I like clean water. Pigs deserve a happy life if they give up their life to feed us. I used to own chickens as pets and I know pigs would make good pets as well. Everyone deserves clean water and a better way to raise pigs is ~~not to~~ Don't create cesspools by cramming them into buildings ~~let them~~ Let them pasture and create a healthier happier pig and no ~~cess~~ wastepools

My name is Morris Murphy. I am the operator of Triple M Family Farms, a 14,000 head finishing farm in Albertson that is in a partnership with my brothers.

Thank you for the opportunity to speak tonight about the proposed swine general permit.

I am concerned about the new permit condition that would require that a permittee either install rain breakers or commit to the presence of an OIC or designated backup OIC at all times during irrigation.

Rain breakers are not foolproof and could offer a false sense of security. They are supposed to automatically shut off the irrigation pump if rainfall is detected, but when the pump is shut off abruptly, a water hammer can develop in the piping system, leading to pipe breaks in some cases. This would certainly not be the intended result with this permit condition.

As with other permit conditions requiring additional equipment to be utilized, this should be done on a case-by-case basis and based on actual recorded violations. Despite what opponents of the swine industry would have folks believe, there is not an epidemic of irrigation while raining. This just isn't needed.

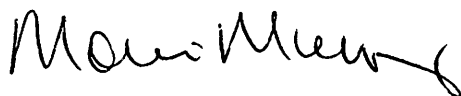
If this permit condition is kept, the permit should allow someone under the supervision of the OIC to be allowed to be the individual present during land application.

There is an existing permit condition that gives the Director the ability to require a flow meter based on violations or bad record keeping. But in this draft permit, flow meters could also be required if the *Division* determines that "flow estimation techniques do not adequately quantify volumes of waste applied." That broad authority should not be expanded beyond the Director and delegated to Division employees.

Also, regarding a new permit condition that could require the installation of equipment to reduce wind drift potential. This permit condition seems unnecessary. It is already a violation to apply waste outside of the land application area, and it is a violation to apply waste in conditions that cause waste to cross property boundaries or enter surface waters. The equipment that would be required to meet such a condition could be very costly for farmers. I would ask that DEQ revisit this proposed condition to evaluate whether or not there is an actual need for such a condition.

Finally, at Section 2, Condition #8, we would like some clarification. What is the reason for changing "animal wastes" to just "swine waste?" I am concerned that the effect of that change could prohibit the grazing of cattle on sprayfields which, as you know, is a common practice. I don't think that is the intent of the of the change, so DWR might want to take a look at that.

Thank you again for this opportunity.

A handwritten signature in black ink, appearing to read "Morris Murphy". The signature is written in a cursive, flowing style.



February 19, 2019

Christine Lawson
DWR Animal Operations
Attn: Swine General Permit
1636 Mail Service Center
Raleigh, NC 27699-1636

Dear Mrs. Lawson

I have lived in Southeast North Carolina for 40 years. I have witnessed, first hand, numerous floods, and tropical storms with devastating affects on our region. Most noticeably I have seen many hogs and other livestock floating down the Cape Fear river as well as plumes of runoff and animal waste inundating the Cape Fear river and as many as 8 miles offshore. Obviously I am very concerned with the impact of the numerous contaminates to our health and economy.

I know that swine factories in North Carolina can be better managed by the General Permit and I strongly believe North Carolina must do a better job of oversight regarding the swine industry.

We need a facility for unannounced and more frequent inspections. We need stronger pollution controls especially the nutrient pollution. A requirement for swine operators to use the state's phosphorus loss assessment tool and limiting phosphorus application where necessary should be written into the permit.

I enjoy Bar B Q as well and I do want the swine industry to be successful; however, we must do much safer, comprehensive and healthier management of the waste generated by this industry.

Being a good corporate neighbor and partner is not new science. Being a good steward of our natural resources is not new science. Being able to eat the seafood, drink the water, swim in the waters and enjoy healthy living in the vast Cape Fear watershed is not too much to ask of our legislatures and governing bodies.

Respectfully requested

Lee Bost
334 Camber Drive
Castle Hayne, NC 28429

JANET ARCHER
Archer Farms
515 Shelley Dr, Goldsboro NC

Swine General Permit Comments

Condition II.7- thank you for listening to farmers concerns about the rule for sludge incorporation changing from the 2014 permit.

Condition II.8- Why was "animal waste changed to "swine waste" question- how does this apply to grazing cattle or the application of poultry litter?

Annual reporting requirement: This is, for my family, the most problematic and frankly offensive potential change to our reporting requirements. We have complied with the most stringent agricultural regulations in the country and cooperated with our existing inspection process. We keep extensive records which are monitored by our inspectors. We do all of this because we want to be good neighbors, good farmers and good citizens. This draft annual report is punitive and appears to criminalize farming and farmers. It's completely redundant. There has been no evidence that annual reporting would do anything other than increase a seemingly endless pile of paperwork. Please eliminate this requirement.

February 19, 2019

Christine Lawson
DWR Animal Operations
Attn: Swine General Permit
1636 Mail Service Center
Raleigh, N.C. 27699-1636

Dear Ms Lawson,

My name is Donna Bost and I have lived and worked in the Wilmington area for the past 37 years. I am very concerned about the quality of water in the Cape Fear river and the impact of contaminates to our health and economy.

I know that the swine producers in North Carolina could be better managed by the General Permit for swine and I believe North Carolina must do a better job of oversight of the industry.

I am writing to request unannounced inspections, and stronger pollution controls especially about nutrient pollution. The permit should require the swine operators to use the state's phosphorus loss assessment tool, and limit the phosphorus application where necessary.

I want the swine operators to be successful but we must seriously explore safer ways to manage the waste produced by this industry.

Thank you for your consideration.

Sincerely yours,

Donna Bost



334 Camber Drive

Castle Hayne, NC 28429

Mrs. Christine Lawson, NC DWR

I am Curtis Barwick, an agricultural consultant working with hog farmers in Eastern North Carolina. I am hired to assist with permit compliance services. One of the services I offer is running PLAT. I am here to question the need to run PLAT (Section I. 9) on every hog farm in the state. I have reviewed many farms' PLAT reports that were performed over the last few years and found that a paltry 3% of fields rated HIGH or VERY HIGH, which would limit phosphorus application. I would forsake a good bit of income but the need to run PLAT is non-existent. Based on past results, PLAT will be a tremendous waste of time and money for the farmer and there is no need to perform PLAT on every farm. However, if forced to run PLAT a major concern is the time-frame to have it completed. The deadline is April 1, 2020. There is NO way that this can be accomplished in such a short period of time as there are not enough Technical Specialists available to perform PLAT plus there is the possibility of overwhelming the NCDA Agronomic lab for sample analysis.

For clarification, Section II.8 states that only swine waste shall be disposed of in the waste collection, treatment, storage or application system. If cattle are grazing on sprayfields, does this constitute waste disposal in the application system from their manure. Would cattle be outlawed from hog farms?

Another clarification is needed for Section II.12 regarding vegetative cover on lagoon embankments to the "maximum pumping elevation on the interior". Does this mean the stop pump level which would be the maximum pumping elevation or do you mean maximum liquid elevation? If it is stop pump, it will be hard to keep vegetation in that temporary storage area as it would be underwater for much of the year.

For rain-breakers, Section II.24, these tools do not function on humid mornings when there is dew present. A hand-held torch is needed to dry them out and the possibility exists for water hammer that could break pipes to occur when the engine stops suddenly. Rain-breakers are not warranted. It is against permit requirements to irrigate during the rain.

Under Section III.2.b, regarding waste level gauge certification, who will be able to re-certify, a Technical Specialist or an engineer or surveyor? It would be very costly if the farmer had to hire an engineer or surveyor to check these gauges. Should farmers only be required to re-certify if DWR questions their gauge's accuracy?

Under Section III.8, weekly stocking and mortality is additional onerous recordkeeping that serves no value to the environment. As long as handled properly what does it matter what a farm's mortality is. This is frivolous busy-work.

For Section III. 11-14, what is the reason for groundwater monitoring on all farms in the 100-year floodplain? The placement, drilling and maintenance, not to mention the sampling costs will be a tremendous burden on these farms that are assumed guilty with no proof to back it up. Could a farmer be removed from this condition if no violations occur? This requirement should be only on a case-by-case basis if a groundwater violation has occurred.

The Annual Certification in Section III.18 is not needed. All of the information requested is made available to inspectors at the yearly inspection. During the inspection, a notation is made of any issues the farm has regarding the questions on the certification report, therefore another report is redundant. Some of the questions are so open-ended and ambiguous such that every farm could possibly be in

violation. Why is this required? Also, why does the form ask about other livestock species that are not under a permitting program being present on the farm? This is a swine permit.

Thank you for the following changes:

Calibration only required every 2 years.

The continued allowance of amendments to Waste Utilization Plans.

Sludge incorporation remaining within 2 days after application.

The extension of land application within 12 hrs. of a hurricane, etc. warning instead of 4 hrs. How many lagoons would not have experienced high freeboard with an additional 8 hrs. of application in what was favorable weather?

Thank you for allowing me to add input into the permitting process.

Curtis Barwick

103 Country Club Circle

Clinton, NC 28328

My name is Clarice Reber. I live at 7919 Blue Heron Drive, #305, Wilmington, NC 28411.

I live down river in Wilmington, NC. We drink Cape Fear River water. This is why I am here. We get what everyone puts in the river. It's the accumulation of stuff that is so concerning to our health. My young grandchildren must take bottled water to school to drink. They don't drink from the water fountains.

In that light, I ask that this General Permit include: 1) permittees to electronically submit records documenting how much waste is applied to crop land, cropping, stocking, and soil and lagoon sampling. We deserve easily accessible information on what is in the waste, where and when the waste is disposed and what is happening to make sure it isn't threatening our health, air, waters. We shouldn't have to drive from facility to facility to find this information.

2) We need technology that ensures permittees comply with the terms of the permit. DEQ needs to make clear when automated technology installation will be required, and currently require it when a permittee violates the conditions of the General Permit. Human error, human circumstances happen and there are too few enforcement officers. Violations of the general permit seem to be difficult to enforce. We need the technology.

3) DEQ needs to plan for mitigation requirements in the floodplains, (e.g., good tech for lagoons). We need to determine and set a time line for those technologies that in the future will protect NC residents' health all up and down the river during the increasingly common high-water events. Florence and Matthew were tough lessons. Let's learn from them.

I would also like to speak in support those folks with few resources and seemingly little political clout who live near the industrial hog farms. They are the most vulnerable to the effects of industrial hog farm pollution. In a 2018 Title VI settlement, DEQ agreed to develop and implement a mapping tool to identify those folks most vulnerable and to use this tool in the General Permit to establish safe conditions for these communities. I understand it is not ready. Therefore, limit this general permit to 2 years. These folks shouldn't have to wait 5 more years to have a safe community.

I live at the end of the Cape Fear river. Please, let us know what is going into our rivers; please control what goes into our rivers to protect the health of my grandchildren and all NC citizens who live near and depend on our rivers for food, livelihood, and recreation.

Thank you.

Good evening. My name is Chad Herring and I am a 3rd generation pig farmer as well as the director of North Carolina Farm Families. I appreciate this opportunity to make comments regarding the swine waste management systems general permit. For many years, I have operated under this permit and followed the regulations set forth by the State of North Carolina. I have always found the technical specialists and inspectors from the NCDEQ to be professional and courteous and their site inspections and review of my records have always been very thorough.

What is not appreciated are the baseless attacks made against the pork industry by activist groups. So often, they use fear, not truth or science to push their agenda. I am not opposed to the General Permit and the current regulations, but I am concerned with any additional regulations that might be a reaction to accusations from these activist groups. They are unfounded, pointless and lack practicality.

One of the draft permit conditions that I see as unnecessary is in Section 2 Condition 20 which could require the installation of application equipment to reduce drift potential. It is already a violation to apply nutrients outside of the land application area or in a manner that would allow nutrients to cross property lines. Also unnecessary is Section 3 Condition 11 which would require an entire subset of farms within the 100-year floodplain to initiate groundwater monitoring wells. This would be very costly for the farmer and should only be required as a result of some offsite evidence of groundwater contamination.

Ladies and gentlemen, I was raised on a farm that my family worked hard to build and now I'm raising my family there also. Please remember that North Carolina's Farm Families are a part of a food system that benefits all of us. We not only provide good jobs and many economic benefits to the state, but we also provide an affordable, safe and nutritious food supply for all families. And we do all this while being good stewards of our natural resources. Thank you for your time.

February 17, 2017

Comments on Draft Permit Number AWG100000 rule changes

General Comments:

- Many confined hog operations are "Family Farms". We do live in the communities where they are operated, often on the farm.
- For a lot of us this is land that has been in our families since the 18th or 19th century and we want our children to have the same opportunity to farm that we have enjoyed.
- We work hard to protect the surrounding environment because our spouse, children, grandchildren, parents live in the same area. We do not want to endanger their health and wellbeing.
- The United States produces safe protein. Protein is one of the last food requirements that we do have control of. As a result, we do not concern ourselves when we purchase pork chops or bacon that it might have trichinosis. Why? Because hogs are not raised on the ground when they root-around in mud and eat wild animals that might pass by. The pork we raise is well cared for. Every day we provide our animals with good water, feed and care. And this helps create prosperity for the State of North Carolina.
- Hogs are the most important livestock product raised in the state, followed by broilers (5-12 week-old chickens) according to the website http://www.netstate.com/economy/nc_economy.htm
- Hogs are important to the state of North Carolina because, we create jobs; the fall-out of those jobs are land, homes, farm equipment, college tuition, etc., that increase federal, state and local tax revenue. Tax revenue to provide employment for school teachers, law enforcement, and many social services needed by the general public, for example Meals on Wheels. And tax revenue pays for your job.
- Our day to day operations are well managed. We are inspected "6 ways from Sunday" and if we were not, we would still manage our operations well because we care. We care about our families, our communities and our legacy.
- Our farms and records are inspected every year by DWR. We are not hiding our operations. We are held accountable for our operations.
- However, if regulatory changes are not economically feasible you will put many of us out of business. Not only will we be without income but a lot of others will also.
- Farming is not a money printing press. Our expenses increase every year and our income does not. It appears that some folks care only about their special interest. We care about the big picture and ask that you are judicious in any change you make to the permit process.

Specific comments:

Section I

- Condition I.9 I object to the suggested Phosphorus Loss Assessment Tool (PLAT) change. Both General Statute and 2T rules say Nitrogen is the rate-determining element for farms under the State General Permit.

Section II

- Condition II.10 I object to the suggested daily mortality recording change. There is no need for this change. The number of dead hogs does not change once the animal has expired. Deceased animals are currently handed in a safe and vigilant manner. Again, there is no need for any change.
- Condition II.17 I object to incorporating requirements to the permit that are currently covered in the OIC rules. This is an unnecessary bureaucracy burden and does not provide additional protection to the environment. In addition, the suggestion that the current 'affirmative defense' provision be deleted is an unnecessary bureaucracy burden to which I object.
- Condition II.18 I object to the suggested change. If no violation has occurred there is no reason for increased farm expense.
- Condition II.23 We cannot control the weather, and neither can DWR. The new notification system issued by the National Hurricane Center in 2018 should be considered in the permit process. In addition, allowance is needed whenever there are days of continuous/intermittent rainfall to allow for sensible irrigation rather than risk failure that would truly put our waterways in danger.
- Condition II.24 I object to the suggested requirement for the installation of rain breakers. This is not needed. We are not allowed to pump in the rain.
- Condition II.27 I object to the suggested requirement that a Professional Engineer be required to certify structural repairs to lagoons. A certified technical specialist is more than capable of making this certification.
- Condition II.28 I object to this suggested change. Nothing is gained by requiring that hay be fed to animals the first winter.

Section III

- Condition III.2 I object to the suggested changes that would allow DWR to require automated freeboard monitors unless there have been documented chronic freeboard recordkeeping violations. Also, no need to require waste level gauges be surveyed and certified unless have been documented chronic freeboard recordkeeping violations. Again, I object to the suggested changes because these issues are currently covered in the existing permit.
- Condition III.3 I object to the suggested change allowing DWR to require an automated rainfall gauge and recorder. We currently record this information. The additional expense is not going to change the amount of rain that falls from the sky.
- Condition III.10 I object to the suggested change that DWR "shall" require groundwater monitoring. This is an additional expense that is not justified.
- Condition III.12 I object to the suggested change that records be kept 5 years. Records are inspected annually by DWR and there is no need for this additional expense to our farm.

- Condition III.15 I object to the suggested change that farms submit an Annual Certification Report. Our farm and our records are available for inspection annually by DWR. This change is not needed and does nothing to protect public health and safety.

Section V

- Condition V.12 I object to the suggested change that we must comply with the Division of Air Quality Odor Rules because there is currently an odor checklist that is part of our permit. This suggested change is not needed.

Respectfully submitted for your thoughtful consideration,



Martha R Robinson
270 Bell Swamp Road
Winnabow, NC 28479