

To:

Mr. Robert Koster
Dept. of Ecology
Eastern Regional Office, Air Quality Program
4601 N. Monroe St.
Spokane WA 99204
RKOS461@ECY.WA.GOV

Comments and Concerns in Reference to the Air Quality Permit for the Easterday Feedlot in Franklin County

Dear Mr. Koster,

Five Corners Family Farmers (FCFF), is a non-profit corporation of the State of Washington. Our Mailing address is: POB 3157, Pasco, WA 99302.

The recently issued Draft, for the Air Quality Permit for the Easterday Feedlot, issued by The Department of Ecology, leaves much to be desired from a local resident point of view. Dr. Keith Thompson a consultant for the Easterday Feedlot mentioned that only 7 pounds of manure and only 4 gallons of urine per animal would be excreted *daily* on average.

“Dry manure will be hauled off-site” said Bill Easterday, who we presume will be involved in some way with the construction and or operation of this feedlot. No where in the draft permit, does it mention a requirement for off-site removal. No specifics of where, when or, how often, this manure removal will take place, is mentioned in the Draft permit document.

The concerns of residents are, that using the *very conservative* figures given by Easterday’s for their project, the daily total of manure will be 210,000 pound and the daily urine excretion will be 120,000 gallons. *In one day!* In one week, that will be 1,470,000 pounds of manure and 840,000 gallons of urine. In one month that will be 6,300,000 pounds of manure and 3,600,000 gallons of urine (28,800,000 pounds of urine). The manure is to be air dried, there is no requirement for removal. The urine is to be used as dust control and or placed in “lagoons”.

The lagoons will be controlled by the “Best Management Practices” of the previously mentioned benevolent operator, the same operator who notified neighbors of a “1,000 + head feedlot” and contacted neighboring landowners within only a one mile radius about the development. Is this Washington States idea of the “good neighbor policy”?

Controls in engineering and development *can* assist in managing anabolic reaction. This in turn does “build-in” *some* assurance of safety. The modeling concepts accepted by Ecology and done through the consultants hired by Easterday, rely solely on this modeling, BACT and t-BACT principles. If the modeling fails, who checks? In the paragraph under Applicable Regulations (3) and sub-paragraph 3.2.3 (WAC 173-460-070) in reference to the BMP, if BMP fail then ASIL thresholds could be surpassed without anyone knowing. However for very little cost, Biological Oxygen Demand (BOD) Testing can and should be required 3 times a week. This is a standard, required of other fume and odor producing industries in the area. Aeration of the lagoons *must* be a requirement of this “point source” industry. Sensor alarms for dangerous gasses and fume are available and must be installed on the borders of this

development. Testing, Sensors and aeration used together are a back-up guarantee of functionality and safety. Together they must be required as a condition for approval.

We are not talking here of a small residential farmer, or feeder. We speak of one of the Northwest's largest feeders of cattle. When we speak of "Industrial strength", it is not said lightly. Easterday Ranches is an Industry. An Industrial Feeder of considerable means who has the resources to protect the public from themselves by guarantees of proper and consistent testing and monitoring to prove they are, the "state of the art" industry they claim. Regardless the protections of the public are not solely, the responsibility of the developer; the State of Washington has an agency mandated to protect the public safety... The Department of Ecology!

It is our opinion that if Washington State does not require some protection of the public from the toxic effects of this industrial development, through regular monitoring and testing, then it is clearly an example of privilege. Privilege, towards the developer is something that has been apparent to the neighboring farmers since the inception of this project.

Respectfully,

Scott J. Collin,
Secretary, FCFE