

RE: Docket ID No. EPA-HQ- OW-2018-0618: Comments on U.S. EPA’s proposed Preliminary Effluent Guidelines Program Plan 14 -- Meat and Poultry Industry Pollution

November 25, 2019

Dear Administrator Wheeler,

On behalf of millions of Americans who care deeply about clean water, the undersigned 102 organizations submit the following comments on the Preliminary Effluent Guidelines Program Plan 14 (“Plan 14”), and urge U.S. Environmental Protection Agency (EPA) to dramatically reduce pollution flowing from agribusiness facilities into America’s waterways.

Meat and poultry processing plants are huge sources of water pollution. The facilities of just five top agribusiness companies dumped more than 250 million pounds of toxic pollution into America’s waterways over a five-year period.¹ Figures 3-1 through 3-3 in Plan 14 also show that meat and poultry facilities discharge huge volumes of nitrogen and phosphorus.

Pollution from these agribusiness facilities contributes to toxic algal outbreaks, fish kills, dead zones, drinking water contamination, and fecal bacteria that can make swimmers sick. In fact, a recent analysis of 98 meat and poultry processing plants found that at least 60 of them discharge to rivers, streams, and other waterways that are impaired because of the main pollutants found in slaughterhouse wastewater.²

Furthermore, the water pollution impact of meat and poultry processing plants extends well beyond their direct - or even indirect - discharges. As more of these facilities are built, they are driving the proliferation of Concentrated Animal Feeding Operations (CAFOs). These factory farms generate millions of tons of manure that all too often wind up in our waterways.

Clearly, we need to reduce pollution from meat and poultry processing plants. Yet, in Plan 14, EPA announced its decision not to revise effluent limitation guidelines and pretreatment standards to reduce the flow of water pollution from slaughterhouses, despite Clean Water Act requirements to ensure these guidelines and standards keep pace with developing technology.

EPA has not set new effluent discharge standards for the largest agribusiness facilities since 2004. Other processing plants are only required to meet federal permit standards set 44 years ago, despite improvements in pollution control technology.

For all these reasons, we urge EPA to stop allowing meat and poultry companies to use our waterways as industrial sewers. Please enact dramatically stricter pollution limits for these facilities. The Clean Water Act requires it. Our rivers, lakes, and streams demand it.

Sincerely,

¹John Rumpler, Corporate Agribusiness and the Fouling of America’s Waterways, Environment America Research & Policy Center (2016) at 2 accessed at <http://www.environmentamerica.org/reports/ame/corporate-agribusiness-and-fouling-americas-waterways>

²Kira Burkhart, et al., Water Pollution from Slaughterhouses, Environmental Integrity Project (2018) at 13; accessed at <https://www.environmentalintegrity.org/wp-content/uploads/2018/10/Slaughterhouse-report-2.14.2019.pdf>

John Rumpler, Clean Water Program
Director
Environment America
Boston, MA

Terry Spence, Executive Director
Socially Responsible Agricultural
Project
Unionville, MO

Meghan Boian, Legislative Counsel
Southern Environmental Law Center
Washington, DC

Hannah Connor, Senior Attorney
Center for Biological Diversity
St. Petersburg, FL

Mary Beth Gallagher, Executive
Director
Investor Advocates for Social Justice
Montclair, NJ

Leslie Samuelrich, President
Green Century Capital Management
Boston, MA

Cristina Stella, Senior Staff Attorney
Animal Legal Defense Fund
Cotati, CA

AJ Albrecht, Senior Policy Advisor &
Counsel
Mercy For Animals
Los Angeles, CA

Martha Salomaa, President
Sipsey Heritage Commission
Dora, AL

Jennifer Kalt, Director
Humboldt Baykeeper
Arcata, CA

Don Hoppert, Director of
Government Relations
American Public Health Association
Washington, DC

Peter Lehner, Managing Attorney,
Sustainable Food and Farming
Earthjustice
New York, NY

Julia DeVito, Digital Campaigner
Environmental Action
Denver, CO

Tarah Heinzen, Senior Staff
Attorney
Food & Water Watch
Portland, OR

Michaele Birdsall, Deputy Executive
Director, Treasurer/CFO
American Baptist Home Mission
Society
King of Prussia, PA

Bashar Qasem, CEO and Founder
Azzad Asset Management
Falls Church, VA

Laura Cascada, Senior Director of
Campaigns & Outreach
Compassion Over Killing
Washington, DC

Cindy Lowry, Executive Director
Alabama Rivers Alliance
Birmingham, AL

Patricia Boss, Treasurer
Dominican Sisters of San Rafael
San Rafael, CA

Nina Jackel, President
Lady Freethinker
Los Angeles, CA

Rudy Arredondo, President/CEO
National Latino Farmers & Ranchers
Trade Association
Washington, DC

Lara Bryant, Deputy Director, Water
& Agriculture
Natural Resources Defense Council
Washington, DC

Yana Kucher, Toxics Program Chair
US Public Interest Research Group
Denver, CO

Nadira Narine, Senior Program
Director
Interfaith Center on Corporate
Responsibility
New York, NY

Anna Falkenberg, Executive Director
Socially Responsible Investment
Coalition
San Antonio, TX

Lucia von Reusner, Campaign
Director
Mighty Earth
Washington, DC

Aryenish Birdie, Executive Director
Encompass
Washington, DC

Charles Scribner, Executive Director
Black Warrior Riverkeeper
Birmingham, AL

Dan Jacobson, State Director
Environment California
Sacramento, CA

Garry Brown, Founder & President
Orange County Coastkeeper, Inland
Empire Waterkeeper, Coachella
Valley Waterkeeper
Huntington Beach, CA

Catherine Minhoto, Treasurer
Religious of the Sacred Heart of
Mary WAP
Montebello, CA

Mikko Jarvenpaa, CEO
Sentient Media
San Francisco, CA

Mary Bernadette McNulty,
Treasurer
Sisters of St. Joseph of Orange
Orange, CA

Hannah Collazo, State Director
Environment Colorado
Denver, CO

Gary Wockner, Executive Director
Poudre Waterkeeper
Fort Collins, CO

Chris Phelps, State Director
Environment Connecticut
Hartford, CT

Suzanne Kelly, Acting President
Anacostia Riverkeeper
Washington, DC

Betsy Nicholas, Executive Director
Waterkeepers Chesapeake
Washington, DC

Georgia Ackerman, Riverkeeper and
Executive Director
Apalachicola Riverkeeper
Apalachicola, FL

Jenna Stevens, Campaigns Director
Environment Florida
St. Petersburg, FL

John Capece, Kissimmee
Waterkeeper
Kissimmee Waterkeeper
Orlando, FL

Susan Inman, Altamaha
Coastkeeper
Altamaha Riverkeeper
Brunswick, GA

Kevin Jeselnik, General Counsel
Chattahoochee Riverkeeper, Inc.
Atlanta, GA

Jesse Demonbreun-Chapman,
Executive Director & Riverkeeper
Coosa River Basin Initiative/Upper
Coosa Riverkeeper
Rome, GA

Jennette Gayer, State Director
Environment Georgia
Decatur, GA

Damon Mullis, Executive Director
Ogeechee Riverkeeper
Savannah, GA

Arthur Norris, Quad Cities
Waterkeeper
Quad Cities Waterkeeper Inc.
Davenport, IA

Haven King-Nobles, Director of
Operations
Fish Welfare Initiative
Normal, IL

Edward Michael, Government
Affairs Com Chair
Illinois Council of Trout Unlimited
Highland Park, IL

Abe Scarr, State Director
IllinoisPIRG
Chicago, IL

Dean Wilson, Executive Director
Atchafalaya Basinkeeper
Plaquemine, LA

Ben Hellerstein, State Director
Environment Massachusetts
Boston, MA

Sylvia Broude, Executive Director
Toxics Action Center
Boston, MA

Kate Breimann, Advocate
Environment Maryland
Baltimore, MD

Sophie Dalterio, Corporate
Compliance Coordinator
Compassion in World Farming
Portland, ME

Anya Fetcher, State Director
Environment Maine
Portland, ME

Carole Nugent, Co-ordinator
Conference for Corporate
Responsibility Indiana and Michigan
Belmont, MI

Nathan Murphy, State Director
Environment Michigan
Ann Arbor, MI

Brad Trom, Mr.
Dodge County Concerned Citizens
Blooming Prairie, MN

Tim Schaeffer, State Director
Environment Minnesota
Minneapolis, MN

Bridget Sanderson, State Director
Environment Missouri
Kansas City, MO

Barbara Jennings, Investor Monitor
Sisters of St. Joseph of Carondelet
St. Louis, MO

Skye Borden, State Director
Environment Montana
Missoula, MT

Kemp Burdette, Cape Fear
Riverkeeper
Cape Fear River Watch
Wilmington, NC

Drew Ball, State Director
Environment North Carolina
Raleigh, NC

Gray Jernigan, Green Riverkeeper
MountainTrue
Hendersonville, NC

David Caldwell, Broad Riverkeeper
MountainTrue
Lawndale, NC

Doug O'Malley, State Director
Environment New Jersey
Trenton, NJ

John Ammondson, State Director
Environment New Mexico
Albuquerque, NM

Levi Kamolnick, State Director
Environment Nevada
Las Vegas, NV

Jill Jedlicka, Executive Director &
Waterkeeper
Buffalo Niagara Waterkeeper
Buffalo, NY

Sister Eileen Gannon, Member
Leadership Team
Dominican Sisters of Sparkill
Sparkill, NY

Gene Baur, President
Farm Sanctuary
Watkins Glen, NY

Chris Navitsky, Lake George
Waterkeeper
Fund For Lake George
Lake George, NY

Peter Topping, Baykeeper
Peconic Baykeeper
Hampton Bays, NY

Joseph Campbell, President
Seneca Lake Guardian, A
Waterkeeper Affiliate
Watkins Glen, NY

Toni Palamar, Province Business
Administrator
Sisters of the Good Shepherd
Astoria, NY

Sandy Bihn, Executive Director
Lake Erie Waterkeeper
Toledo, OH

Julie Skye, Principal
Skye Advisors, LLC
Tulsa, OK

Celeste Meiffren-Swango, State
Director
Environment Oregon
Portland, OR

Erin Eberle, Director of Engagement
Farm Forward
Portland, OR

Josephine Pelster, Sister
Maryville Nursing Home
Beaverton, OR

Tracy Carluccio, Deputy Director
Delaware Riverkeeper Network
Bristol, PA

Ted Evgeniadis, Lower Susquehanna
Riverkeeper
Lower Susquehanna Riverkeeper
Association
Wrightsville, PA

David Masur, Executive Director
PennEnvironment
Philadelphia, PA

Tom McCaney, Associate Director,
Corporate Social Responsibility
Sisters of St. Francis of Philadelphia
Aston, PA

Christine Ellis, Executive Director
Winyah Rivers Alliance
Conway, SC

Cara Schildtknecht, Waccamaw
Riverkeeper
Winyah Rivers Alliance
Conway, SC

Kathy Hawes, Executive Director
Tennessee Clean Water Network
Knoxville, TN

Jordan Macha, Executive Director
and Waterkeeper
Bayou City Waterkeeper
Houston, TX

Luke Metzger, State Director
Environment Texas
Austin, TX

Elly Boehmer, State Director
Environment Virginia
Richmond, VA

Eleanor Hines, North Sound
Baykeeper
North Sound Baykeeper at RE
Sources for Sustainable
Communities

Judy Byron, OP, Director
Northwest Coalition for Responsible
Investment
Seattle, WA

Jennifer Hall, Treasurer
Sisters of Providence - MJP
Renton, WA

Jerry White, Jr, Spokane
Riverkeeper, Program Director
Spokane Riverkeeper
Spokane, WA

Ann Roberts, ESG Analyst
Dana Investment Advisors
Waukesha, WI

Susan Ernster, Vice President
Franciscan Sisters of Perpetual
Adoration
La Crosse, WI

Tony Wilkin Gibart, Executive
Director
Midwest Environmental Advocates
Madison, WI

Cheryl Nenn, Riverkeeper
Milwaukee Riverkeeper
Milwaukee, WI

Tim Dewane, JPIC Director
School Sisters of Notre Dame -
Central Pacific Province JPIC Office
Elm Grove, WI

Megan Severson, State Director
Wisconsin Environment
Madison, WI

**RE: Docket ID No. EPA-HQ- OW-2018-0618: Comments on U.S. EPA's proposed Preliminary Effluent Guidelines
Program Plan 14 -- Meat and Poultry Industry Pollution**

RE: Docket ID No. EPA-HQ-OW-2018-0618: Comments on U.S. EPA's proposed Preliminary Effluent Guidelines Program Plan 14 -- Meat and Poultry Industry Pollution