

Public Hearing Comments

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Comments on Docket #2021-P-W-0013 -- NPDES CAFO Permits

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Comments:

The proposed CAFO permits are inadequate and should not be approved as proposed because: 1: It appears the proposed permits would allow CAFO's to operate without an approved plan. CAFO's should not be allowed to operate without a formal plan that has been reviewed and approved by the state. 2: The records CAFO's are required to keep should all be submitted to the state annually and available for public review. Accountability is only possible when records are publicly available and the Clean Water Act calls for records to be publicly available. 3: CAFO's need to be audited on-site more often than just every five years. Since we now have fewer individual sites with larger operations on-site review should be feasible more frequently than when there were thousands of "mom and pop" operations. 4. Delaware has historically done a bad job of regulating agricultural waste leading to highly polluted surface and ground water and it is time for the state to take its responsibilities to protect the health and safety of its citizens seriously.