

Bureau of Environmental Programs

State Fairgrounds • P.O. Box 19281 • Springfield, IL 62794-9281 • 217/785-2427 (voice/TDD) • Fax 217/524-4882
Pesticide Misuse Hotline 1-800-641-3934 (voice/TDD)

April 2, 2008

Mr. A.J. Bos
Tradition South
15857 Bear Mountain Blvd.
Bakerfield, CA 93311

RE: Tradition South
Facility ID#: LF0850180000

Dear Mr. Bos:

Pursuant to Section 12.1 of the Livestock Management Facilities Act (Act) (510 Illinois Compiled Statutes (ILCS) 77/12.1), the Illinois Department of Agriculture (Department) has reviewed all documents relative to your proposed construction of a livestock management facility and livestock waste handling facility. These documents include: the notice of intent to construct application; transcripts and related exhibits from the informational meeting held on January 10, 2008; the Jo Daviess County Board's recommendation; your response to our March 11, 2008 request for additional information; and all additional information submitted and received by the Department regarding your proposed facility. As a result of the review, the Department finds that additional information is needed in order for the Department to make its final determination regarding the siting of your proposed facility as required by Section 12.1(a-5) of the Act and 8 Illinois Administrative Code (IAC) 900.407. Our additional information request is as follows:

- At the public informational meeting, facility representatives discussed the use of two main odor control methods to be utilized by the proposed facility. Those methods included the use of a naturally occurring "crust" or "bio-cover" associated with the operation of the holding ponds and the use of subsurface injection and/or incorporation as the primary manure application methods. As previously requested, please provide a listing and detailed description of all odor control technologies and plans to be utilized by the facility.
- During the public informational meeting and subsequent county board meetings, facility representatives discussed several approaches to minimize the impact of the proposed facility on existing traffic, including the possibility of upgrading a portion of East Mahoney Road to an 80,000 lb road. As previously requested, please provide a detailed discussion of your plans to address traffic issues associated with your proposed facility. Please provide a map detailing any proposed road improvements, additions, etc., including a depiction of traffic flow to and from the facility.

- Various livestock waste handling facility dimensions presented in the Notice of Intent to Construct Application are not consistent with the Non-Lagoon Livestock Waste Handling Facility Application and associated construction plans and specifications. In addition, the number of waste holding ponds presented in the Notice of Intent to Construct Application is not consistent with the Non-Lagoon Livestock Waste Handling Facility Application and associated construction plans and specifications. Please revise the Notice of Intent to Construct Application as necessary.
- *Sheet C6, Baffled Weir Plan View* has a note which refers to a 21 inch wide emergency spillway. It appears the note should refer to a 21 foot wide emergency spillway. Please revise the plans as necessary.
- The Department recognizes the liner construction specifications presented in the drawings. Please revise *Sheet C8 Notes* to present the constructed compacted clay liner permeability rate. Please be advised the liner must be certified by a licensed professional engineer prior to placing the waste holding ponds in service.
- Department review of the waste holding pond drawings finds that the drawings do not present erosion control structures for agitation locations, waste removal locations, etc. In addition, berm erosion control provisions are not presented. The Department recognizes *Note 7 of Sheet C3* (reference to *Sheet SW1*). The Department has not received *Sheet SW1*. Please submit erosion control procedures for the aforementioned items and revised plans as necessary.
- *Sheet S10* has notes in the upper right and lower right hand corner of the drawing that refer to the pre-calving freestall barn walkway and maternity barn walkway. The notes appear to be switched. Please revise the plans as necessary.
- Various details presented on *Sheet S15, Sheet S16, Sheet S17, and Sheet S18* refer to epoxy grouting of reinforcement. If these designs are still proposed then please be advised an alternative design request shall be required. Please revise the plans as necessary.
- *Sheet S16, Section NN: Feed Drive at Walkway* has a note regarding hydrophilic rubber compression type waterstop. The note pointer appears to be pointing to reinforcement and not waterstop. Please revise the plans as necessary.
- *Sheet S17, Detail D: Bedcurb* and *Detail B: Perimeter Wall (Typ)* notes use the abbreviation "DBS" and "DI". The notes associated with these abbreviations are presented on *Sheet S15*. Please submit details of this mechanical fastener. If this design is still proposed then please be advised an alternative design request shall be required. Please revise the plans as necessary.
- Please submit a detailed plan view drawing of the walkway located between the holding area and maternity barn. Please also submit a detailed plan view drawing of the walkway located between the pre-calf freestall barn and holding area. Please also submit a detailed cross section through the walkway(s).

- The Department has reviewed the previously submitted site boring logs and requests the applicant conduct and log at least two additional continuous borings into bedrock. Each boring should be angled, extend to a vertical depth of at least 20 feet below the planned bottom of the proposed livestock waste handling facility, and provide horizontal projections of at least 20 feet in bedrock. In addition, the borings should be directed horizontally 90 degrees from each other. As an alternative, the applicant may consider the advancement of 4 borings (two pairs) into bedrock. Each boring should extend to a vertical depth of at least 20 feet below the planned bottom of the proposed livestock waste handling facility with horizontal projections of each boring being at least 10 feet in bedrock. Each pair of borings should provide a total of 20 feet of continuous horizontal projection in one direction. One pair should be horizontally 90 degrees from the other. All cores of the bedrock should be appropriately logged and boxed at the site by a registered professional geologist and retained for possible examination by IDA staff. It is not necessary to collect additional samples of the unconsolidated materials. The Department further requests the applicant reevaluate the previously submitted site investigation results and submit another signed and appropriately certified Non-lagoon Livestock Waste Handling Facility Certification of Site Investigation form. Boring logs and an updated discussion which considers all work conducted at the site should accompany the new form.

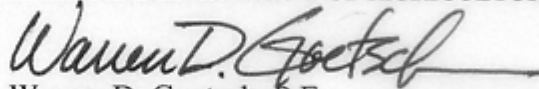
Please be advised, the Department will be unable to make a final determination concerning the status of your proposal until all applicable items required by the Act have been submitted for Department review.

Note: Please be advised of the waste management planning requirements of the Livestock Management Facilities Act (510 ILCS 77/20 (d)) and how they apply to the proposed facility. Facilities with a maximum design capacity of 5,000 animal units or greater are required to submit a formal waste management plan to the Department for review and approval, pursuant to the 510 ILCS 77/20(d) and 8 IAC 900.802 (d)(1), prior to placing the facility into service.

If you have any questions concerning this letter, please contact the Department at 217/785-2427.

Sincerely,

ILLINOIS DEPARTMENT OF AGRICULTURE



Warren D. Goetsch, P.E.

Bureau Chief, Environmental Programs

cc: file

Jo Daviess County Board

Terry Feldmann, Maurer Stutz, Inc. Engineering