

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>

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