




DELTA COUNTY, COLORADO
DEPARTMENT OF HEALTH & HUMAN SERVICES
ENVIRONMENTAL HEALTH DIVISION

255 WEST 6TH STREET, DELTA, CO 81416
PHONE : (970) 874-2165 FAX: (970) 874-2175

Memorandum

Date: October 12, 2012

To: Delta County Board of Commissioners

From: Kenneth Nordstrom 
Director of Environmental Health

Re: Western Slope Layers Air Emissions

The reported health concerns from neighbors surrounding the Western Slope Layer facility generate concern by this Department. The complaints from citizens and letters received by the County include letters from doctors expressing concern for the health of persons in the community exposed to the emissions from the henhouse operation. While health problems from occupational exposure to poultry dust and confined animal feeding are documented in industrial hygiene and medical literature, the complainants have extrapolated the conclusions regarding occupational exposure to ambient environmental exposure. However, those two types of exposures are quite different and in this department's limited literature review, deleterious health effects from environmental exposures are not well documented and should not be compared to an occupational exposure. The burden of proof is quite high and it is difficult to confirm an actual causable link between the henhouse emissions and a person's illness or pulmonary difficulties. There are many other environmental factors that could exacerbate allergic reactions, asthma, and COPD that have been reported by the complainants. Such causes would include prior exposure to dust, pollen, wildfire smoke, low humidity, and hot summer temperatures as experienced last spring and summer from a variety of other sources. Anxiety and fear of the poultry operation may also exacerbate asthma attacks and bronchitis episodes. Qualified medical professionals would need to evaluate each complainant's prior medical histories and previous occupational exposures to confirm the link between a current health problem and the poultry operation. In a counter argument, there are visitors to the facility who have not complained of health problems, neighbors who have reported that their health has been unaffected by the poultry operation, and the health of the Hostetler family members (who work and live at the facility) appear to be unaffected. Nevertheless, the health of the community and pleas for relief cannot be neglected.

The air sampling conducted by Plateau Incorporated August 16, 2012 demonstrated that there was a large plume of dust emitted from the Western Slope Layer facility at that time. Upon laboratory analysis, the majority of the dust emissions are a mix of mineral dust and cellulose. A smaller proportion of the emissions include a mix of bio aerosols along with chicken feathers and dander also being generated in the facility and discharged into the atmosphere. These emissions are no different than other confined animal feeding operations. However, high concentrations of these emissions can be quite obnoxious and irritating for those affected by it.

The Colorado State Statutes exempt agricultural animal feeding operations from air pollution control regulation pursuant to C.R.S. 25-7-109(8)(a). Therefore, there are no regulatory standards in the State of Colorado for permissible levels of air pollution emissions from confined animal feeding facilities such as Western Slope Layers. Since there are no regulatory standards, there are no Colorado regulations for pollution control equipment, emission standards or specified best management practices to be required at facilities such as this. Other states and countries have

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adopted regulations and this Department has collected and reviewed some of that literature. There are best management practices, equipment, and natural barriers available to reduce air pollution from poultry facilities as discussed in this literature.

This Department offers the following recommendation for consideration in order to further evaluate and reduce air pollution emissions from Western Slope Layers:

Modify the development agreement to require Western Slope Layers to obtain the services of a professional air pollution engineer to evaluate the air pollution emissions and provide a plan for reducing air emissions from the facilities.