

**RECORD OF DECISION
CITY OF ALBANY, KENTUCKY
CAGLE WATER EXPANSION PROJECT
ENVIRONMENTAL IMPACT STATEMENT**

The City of Albany, KY, located in south-central Kentucky, has applied for financial assistance to expand its water treatment plant from 2 to 5 million gallons per day, build a new raw water intake structure, install new treatment system equipment, install 5.3 miles of a water main, and construct a 1.5 million gallon water storage tank. This proposal is part of the Kentucky Highland Empowerment Zone initiative that seeks to empower economically depressed rural communities to pursue economic development through a government and private business partnership.

In accordance with the National Environmental Policy Act of 1969 (42 USC 4231 *et seq.*) and Agency regulations, the U. S. Department of Agriculture, Rural Utilities Service (RUS) prepared an Environmental Impact Statement (EIS) concerning this action. RUS announced its intent to prepare an EIS on November 29, 1996. The availability of the draft EIS was announced in the Federal Register by RUS on April 16, 1997 and the U. S. Environmental Protection Agency (USEPA) published receipt of the document on April 25, 1997. The availability of the Final EIS was announced by RUS in the Federal Register on June 19, 1997 and USEPA published their receipt on June 20, 1997. After fully considering the environmental impacts of the proposed action, the Agency has decided to approve the proposal.

The project alternatives that were considered included:

- the proposed action, to include alternate water main routes;
- the use of ground water to supply the treatment plant versus using Lake Cumberland as a source of surface water;
- the use of other water sources to supply the needs of the Empowerment Zone projects;
- maintaining present treatment capacity of existing plant and promote the use of recycled water by the empowerment zone projects; and
- the No-Action alternative.

Three of the above alternatives were considered impracticable, or unreasonable, therefore the EIS concentrated on only two alternatives: the action to expand the water treatment plant and the No Action alternative. Upon consideration of all of

the alternatives and the environmental implications of each alternative, the proposed action was chosen as the most environmentally preferred. There were no environmental consequences of the treatment plant expansion that could not be mitigated through standard construction practices.

Even though the direct environmental effects of the proposed action were of a routine construction nature, the secondary or indirect environmental impacts of the proposal could be significant. As a direct consequence of the water treatment facility expansion, Cagle's Industries is planning to locate a poultry processing plant in the Clinton County area. To support the poultry processing plant, construction of support operations such as a feed mill, hatchery, poultry farms, and associated utility lines and ancillary systems will be necessary. Of these actions, the waste water handling practices of the processing plant and waste handling practices of poultry house operations could have potentially significant environmental consequences.

The processing plant is located in an area underlain with limestone bedrock with known karstic characteristics, that is, with sinkholes and sinking streams created by rock dissolution. Karst topography normally has underground caves and solution channels that have developed as a result of dissolution along the joints, bedding planes or other openings in the bedrock. This geologic environment could lead to potentially significant ground water contamination if the waste water from the processing plant is not treated and disposed of properly.

The engineering design plans for the plant's waste water treatment operation were reviewed and it was concluded that if the waste stream was treated as designed there would be little potential for ground water contamination. The State of Kentucky's, Department for Environmental Protection, Division of Water, which has permitting authority under the Water Pollution Control Act, was consulted as to their review of the waste water treatment design plans. They had earlier approved the plans and issued a no-discharge permit for the plant using the same design plans. This permit had expired because Cagle was unable, due to a fire in one of their other plants, to start construction on their proposed plant within the required time period for the permit. RUS was informed by the State of Kentucky that they were planning to re-issue the permit upon receipt and review of the proper permit application from Cagle.

The preferred waste water discharge method at the site is drip and spray irrigation. Engineers and soil scientists were consulted regarding the in-situ soil's ability to handle the water and waste loading from the proposed irrigation operation. It was determined that the waste water treatment design plans had calculated these loading factors using appropriate soil characteristic data. In addition to the area's predicted ability to handle the water and waste loading from the processing plant's waste stream, ground water monitoring will be required as part of the State of Kentucky's permit. Therefore, the State of

Kentucky has the ability to monitor on-going operations at the plant both prior to waste water being discharged through the irrigation system and in ground water monitoring wells. In the unlikely event improper or inadequate treatment of waste water is occurring at the plant, the State has the authority to intercede and require Cagle to implement corrective actions.

Cagle has a plant in Albany, Georgia that is replica of the plant that is being planned for the Clinton County site. Both plants have similar waste water treatment facilities. The only difference between the plants will be that the Georgia plant discharges into a public waste water treatment works after pretreatment, whereas, the Clinton County plant will discharge its treated waste water via drip and spray irrigation on the surrounding agricultural lands. Cagle's Georgia plant has been monitoring water quality parameters prior to discharge into the public sewer system and has been able to demonstrate that their treated waste water designs are effective. Therefore based on these analyses, RUS believes that the potential for ground water contamination from the poultry processing plant is minimal and with proper monitoring by the State of Kentucky through the required ground water monitoring program, RUS is confident that the State will require Cagle to take corrective actions if it is determined that site conditions warrant them.

Another potential for water quality problems could occur if poultry house waste materials in the form of manure or dead birds are mishandled. It was estimated that the pullet and breeder houses that would supply inputs into the chicken processing plant would be located within approximately a 20-mile radius of the feed mill and hatchery site located in Franklin, Kentucky. The broiler houses were estimated be located along corridors that follow Rt. 52 between Portland and Moss, Tennessee; and Highway 65 to Rt. 90 between Bowling Green and Beaumont, KY.

No specific locations for the pullet, breeder and broiler houses have been identified. The processing facility would require approximately 20 pullet houses, 48 breeder houses, and 376 broiler houses to be built. Broiler farms would have 3 or 4 houses on them. This means that at a minimum, approximately 134 farming operations would be required. Even though the location of specific poultry houses have not been identified, it is probable that they will be built and if the waste materials from these facilities are mishandled, potential surface and ground water quality degradation could occur.

Even though RUS does not have any direct involvement in providing regulatory oversight over or technical assistance to poultry growers, we are concerned with the potential for water quality degradation. As such, RUS has formally requested the USDA, Natural Resources Conservation Service (NRCS), formerly the Soil Conservation Service, to help organize and sponsor a symposium where technical assistance and regulatory programs for the poultry industry will be

discussed with the growers, concerned private citizens, and State regulatory officials from Kentucky and Tennessee. The Agency believes such a symposium will bring State regulatory officials and Federal and State agriculture officials and specialists together to focus and highlight the concerns such an influx of poultry operations will bring to the area. Economic growth in the area's agricultural sector could be a positive influence in the region's economic outlook provided the technical assistance and environmental protection tools are in place to monitor on-going activities and provide appropriate oversight to protecting the region's water quality resources. It is anticipated that the proposed symposium will be conducted sometime in the next six months; the public will be invited to participate. Public notices will be forthcoming. On an ongoing basis, NRCS staff will be available to provide technical assistance and consultation on environmental quality issues.

The public expressed concerns relative to Cagle's ancillary facilities in the Franklin, KY area. The primary facilities in this area are a proposed feed mill and hatchery. The primary concerns expressed related to odors and water quality issues. Since the feed mill will be grinding and mixing poultry feed, the only odor will be that common to dry feed grains. No offal will be brought to the site. It is anticipated that because the hatchery is an enclosed environment it will have minimal odors.

The feedmill and hatchery operation is estimated to use 23,000 gallons per day. Water will be purchased from the Simpson County Water District, which buys its water from the Whitehouse Utilities District in Tennessee. The District draws its water from the Old Hickory Reservoir.

Operation of the feed mill and hatchery would generate approximately 700,000 gallons of waste water per month. The waste water would be pretreated by above-ground aeration tanks before being discharged to the Franklin City sanitary sewer. No on-site discharge of waste water would occur. Thus RUS concludes that the potential for contaminating surface and ground water would be minimal.

The proposed action has a potential for significantly affecting the socio-economic outlook for the region, particularly in the Clinton County area. The development of the poultry processing plant will generate an influx of jobs and all of the associated development needs that accompany such economic growth. This, of course, is a primary purpose of the Empowerment Zone initiative and local officials and the public are welcoming the potential for such growth. Based on discussions with Clinton County and Empowerment Zone officials, RUS has concluded that these officials are fully aware of the development pressures they may face in the near future as personnel and business incomes increase. Although the Clinton County area has no comprehensive land use plans in place to affect reasonable and responsible

growth, we believe County officials now have the impetus to look more closely at the positive benefits such a planning process could have its area's development. Personnel from the USDA, Rural Development mission area stand ready to provide technical and programmatic support service to County and Empowerment Zone officials.

Considering all of the above factors and the positive impact the proposed action will have on economic growth in the area, RUS believes that its decision to finance the City of Albany, Cagle Water Expansion Project balances the need for economic development and environmental protection. There is a potential for adverse environmental impacts to occur, however should it be necessary, the regulatory framework is firmly in place at Federal and State levels to enforce environmental protection standards. RUS is confident that the State of Kentucky and local officials will provide the necessary leadership in meeting its obligations to enforce these regulatory standards.

signed

John P. Romano
Deputy Administrator
Water and Environmental Programs
Rural Utilities Service

July 24, 1997

Date