



PO Box 1623
Bloomington, IL 61702-1623
PH: 309-557-3257

www.ilcorn.org

October 13, 2020

Joint Committee on Administrative Rules (JCAR)
700 Stratton Building
Springfield, IL 62706

Re: Comments on Second Notice, Anhydrous Ammonia, Low Pressure Nitrogen Solutions, Equipment, Containers, and Storage Facilities (8 Ill. Admin. Code 215)

Dear JCAR:

Illinois Corn Growers Association (ICGA) appreciates the opportunity to provide comments in response to the Notice of Proposed Amendments to 8 Ill. Admin. Code 215.

Our association was founded in 1972 to represent the needs of corn farmers in Illinois. We currently represent more than 4,000 Illinois corn farmers, who grew the second largest corn crop in the U.S. in 2019. These corn farmer members are the farmers most impacted by the anhydrous ammonia certification in question.

ICGA's biggest concern is with the lack of a published date for all the certifications to be completed. Absent a date, farmers are left to assume that the certification must be completed as soon as possible, or before they need to apply anhydrous ammonia again. We believe that timeframe to be nearly impossible, especially given the current restrictions in place due to the COVID-19 pandemic.

Our association looks forward to the opportunity to provide assistance in the development of the certification and the discovery of qualified instructors. However, farmers will again apply anhydrous ammonia in the spring 2021, leaving only a few months to develop the curriculum and certify an estimated 5,000 Illinois farmers and farm operators. That timeline is nearly impossible.

Additionally, while IDOA seems to intend to offer in-person and online courses, many Illinois farmers will prefer an in-person educational opportunity based on our consistent evaluation of communication preferences and broadband availability of our farmer members. In-person courses will have limited seating in accordance with the State of Illinois's COVID-19 response guidelines. This will significantly limit how many farmers can be trained in a short amount of time.

Based on the above concerns, ICGA respectfully asks for a completion date for the initial certification to be April 1, 2022.

Thank you for the opportunity to comment on the second notice of these rules. ICGA staff and farmer leaders are always available for further discussion or to answer your questions regarding our comments at www.ilcorn.org.

Sincerely,

William L. Leigh
President