



December 9, 2013


Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Subject: Comments on Draft Permit Renewal
 NPDES General Permit ARR000000
 Facilities Discharging Stormwater Associated with Industrial Activity

Tyson Foods Inc. (Tyson) is submitting the following comment on the Draft IGP permit with proposed effective date of 7/01/2014. The comment is listed by the proposed section as it appears in the draft permit.

- Part 3.1; Tyson is opposed to the inclusion of BMP's as non-numeric permit conditions. Including BMP's as permit conditions creates very subjective permit requirements that:
1. May or may not be applicable to every given situation;
 2. Are open to different interpretations by the permittee, the permitting authority, and the inspector;
 3. Creates an un-reasonable standard for regulated community by mandating such things as "all" exposed areas, "all" industrial equipment, "all" control measures, and "must" take all manner of actions.
 4. Removes any discretion by the permittee to select the most practical, cost effective steps to consider, construct, and/or implement to control stormwater from any facility covered by this permit.

Sincerely,



Garrett Hafemann, PE
Tyson Foods Inc.