

From: Carol Bitting [mailto:lcbitting@gmail.com]
Sent: Monday, July 28, 2014 2:29 PM
To: Szenher, Doug
Subject: Notification Reg 6

July 28, 2014

I am writing in a request to change the public notification requirements on ARG590000.

Below is an excerpt taken from ARG59000 CAFO fact sheet ADEQ's web site; http://www.adeg.state.ar.us/water/branch_permits/general_permits/default.htm

The Arkansas CAFO General Permit ARG590000 incorporates the 2008 CAFO rule from Federal Regulations. The permit is also in compliance with state-level regulations (APCEC Regulation Nos. 2, 5, 6, 8, and 9) concerning the permitting process. dated 10/31/2016

Are we really adding something to the Regulations that aren't already there? Or have you been ignoring that the rules and regulations are there yet you have decided to ignore they are?

For instance, if you decide an industrial feed lot can become a farmer and bypass the APCEC Regulations Nos. 2, 5, 8 and 9 without notifying the adjacent landowners then there is a serious issue here. You have been telling us C & H followed all the rules, apparently anyone wishing to destroy environment can apply for a Reg 6 and are only under Reg 6 law. I believe if ADEQ continues to believe that C & H Hog Farms followed all the laws then ADEQ needs to go back and read Arkansas law. The above italicized statement requires C & H and any other CAFO to notify nearby property owners of the CAFO and all property owners adjacent to the spray fields. Regulation 5 does apply and the notification process is already here. Regulation 6 can only be if Regulation 2, 5, 6, 8, and 9 are followed.

If we need to have more stringent notifications which large polluters definitely need then by all means make the notifications 30 days in a newspaper located in the county of proposed action. All adjacent landowners and any other agency that would need consideration. If the National Park Service is located within this county then by all means it should be notified, especially since the NPS is a protection of the Buffalo National River, the first designated National River and a gift to Arkansas to protect.

The NPS provides a service that allows for the public to hunt, fish, swim and enjoy the lands for recreational use. They are utilized for all their services and provide to our community a service that should be valued with the highest of respect because of what is provided for our recreation.

Newton County has a large amount of semi truck accidents within our state. The NPS is called to contain the spills from the accidents. If a large feed lot or CAFO is hauling liquid waste or live animals and overturns within the 5 counties that the Buffalo River runs thru, not counting the counties the White

River flows thru then they need to be prepared to handle these type of accidents. Notification is essential and should be of the highest consideration. I believe there is no reason to modify Reg 6 as it states Reg 6 must be in compliance with state-level regulations (APCEC Regulation Nos. 2,5,6,8 and 9, but if you are planning to have Reg 6 stand alone as an industrial permit to pollute the waters of the state then by all means it needs allot of modifications. Today it stands as an industrial permit to pollute unless you consider that the Arkansas law must be followed and no exclusions.

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Sincerely,

Carol Bitting

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