

To Whom This May Concern:

RE: Draft Renewal of Permit 3540-WR-7

There are many taxpaying citizens of the State of Arkansas that are tired of the incompetence that the Arkansas Department of Environmental Quality (ADEQ) continuously displays not only with this permit modification, but in various areas.

Comment One

Under Section 6 (i.e. Receiving Stream Location) to paraphrase in paragraph two ADEQ states that various fields are approximately (e.g. 29 miles, 22 miles, 19 miles, 18 miles, 15 miles, 10.5 miles, 8 miles, and 7.4 miles) or more from the Buffalo River. This illustrates ADEQ's lack of acquiescence, deliberate or not, to address the geology and hydrogeology of the area. A Professional Geologist (P.G.), which specializes in hydrogeology will inform you that in fractured limestone terrain (i.e. Karst) such as the Boone-St. Joe Formation, which many of the spreading fields are located, these horizontal distances from the spreading fields to the Buffalo River are not relevant. It is quite obvious that ADEQ is lacking P.G.'s with specializations in hydrogeology. An analogy would be that any individual that is Medical Doctor (M.D.) can perform neurosurgery. I know I would not want my M.D. (e.g. Family Practitioner) to perform brain surgery on me. In comparison, there are geologists that specialize in Geochemistry, Geophysics, Paleontology, Stratigraphy, Petroleum, etc. ADEQ has several P.G.'s on staff, but it is assumed that very few of them have academic specializations in the field of hydrogeology. It is believed that most of them do not have Master of Science degrees which provides an individual with a specialization in a distinct discipline in the field of Geology.. Unfortunately, this leads the majority of readers (e.g. non scientific people) to believe that since the spreading fields are horizontally miles from the Buffalo River that spreading raw swine waste on them is acceptable. I am familiar with agriculture disciplines and the potential uptake of raw swine waste that vegetation and soil absorption has on the spreading fields but, this is and will always be a contentious issue.

The following request is being made per the Freedom of Information Act (FOIA). Please provide the P.G.'s that ADEQ has on staff that have a Master of Science degree with a specialization in Hydrogeology that are currently employed in the former Water Division's NPDES Branch or any P.G. that worked on the permitting of the C&H's concentrated animal feeding operation (CAFO). Please provide the names of the P.G.'s, their college transcripts, state application along with their resume. ADEQ has four business days to provide this information from receipt of this transmittal. Please send the information to me electronically via the email address shown on this transmittal. If this is unacceptable please send the information to the address at the end of this transmittal. I will pay for any copying and shipping charges.

It has been documented by notable hydrogeologists that groundwater in a karst terrain can travel approximately a hundred miles in one day. In Newton County it has been documented through dye tracing that interbasinal groundwater flow occurs and groundwater can travel several miles a day. Therefore, what does a field that is situated on karst geology that receives raw swine waste actually mean? ADEQ is once again ignoring basic hydrogeologic science by making this major permit

modification. Please stop trying to "pull the blindfold" over the taxpayers that are paying your salaries. This is all going to come back to ADEQ. You are tasked with protecting the waters of our State and you have failed miserably in this area at various locations across our beautiful state.

Comment Two

In the second paragraph under Section 6 (i.e. Receiving Stream Locations) ADEQ utilizes controversial words in the paraphrased sentence "land application activities should not impact the Buffalo River.....". Please define the meaning of the words "should not". Does this mean spreading swine waste on the aforementioned fields "may", "could", or "possibly" impact the Buffalo River? Once again ADEQ is utilizing wording that is often used and is analogous to "CYA" words which ADEQ does throughout this draft permit, documents, correspondence, etc. Please clarify the meaning of these words. **Is the spreading of raw swine waste on the aforementioned fields going to impact the Buffalo River or not? Please provide a simple "yes" or "no" answer to this question.**

Comment Three

Under Section 10 (Total Available Acreage) you state field CCGW amongst others "are not included in the permit due to the assigned P-Index risk of high or very high". However, on page 4 of the Draft Permit you include this field and state it has a "low P-Index risk". Please correct this blatant mistake.

I would like my public comments to be placed on record. Obviously, **I am opposed to this permit modification.**

I expect responses to the above comments within thirty days (30) of your receipt of this transmission as well as being posted on ADEQ's website.

Sincerely,

John Murdoch
11908 Elk Ridge
Wesley, AR 72773

From: [J. Murdoch](#)
To: [Water Draft Permit Comments](#)
Subject: Water-Draft-Permit-Comment@adeq.state.ar.us (waterdraftpermitcomments@adeq.state.ar.us)
Date: Friday, April 08, 2016 5:21:53 AM
Attachments: [FINAL PDF.pdf](#)

I sent the same comment to " waterdraftpermitcomments@adeq.state.ar.us", but later saw "Water-Draft-Permit-Comment@adeq.state.ar.us" as a possible email address for placing my Public Comments. Please review my comments and place them on record as public comment and notify me that you have received them before the deadline today if you would.

Sincerely,
John Murdoch