

**From:** [S.Hodge](#)  
**To:** [Water Draft Permit Comment](#)  
**Subject:** [BULK] ARG590001 permit comment (3)  
**Date:** Tuesday, April 04, 2017 9:17:30 PM

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## ARG590001 permit comment on recycling

Would like to see another condition added to the permit, one where Cargill ( the parent company of C&H CAFO operation in Newton County) commits to participating either directly or indirectly in alternative nutrient recycling and recovery programs of the type already recognized at Challenge.gov and allocates resources to come up with better nutrient management practices at its CAFOs.

(see <https://www.challenge.gov/challenge/nutrient-recycling-challenge/>)

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**From:** [S.Hodge](#)  
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**Subject:** [BULK] ARG590001 permit comment (2)  
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ARG590001 permit comment.

According to EPA guidance on Recreational Water Quality Limits ([www.epa.gov/npdes/recreational-water-quality-criteria-limits.html](http://www.epa.gov/npdes/recreational-water-quality-criteria-limits.html)) retrieved 19-January-2017,

The 2012 RWQC recommendations are for two bacterial indicators of fecal contamination, enterococci and *E. coli*. Section 304(a)(9) of the Clean Water Act directed EPA to publish new or revised water quality criteria recommendations for pathogens and pathogen indicators for the purpose of protecting human health. A pathogen indicator, as defined in section 502(23) of the CWA, is "a substance that indicates the potential for human infectious disease." Most strains of enterococci and *E. coli* do not cause human illness (that is, they are not human pathogens); rather, they indicate the presence of fecal contamination.

Research from entities such as Entergy and EPA suggests that the *E. coli* is a better indicator than fecal coliform parameter. I would like to see the permit writers add both a maximum daily contaminant limit as well as monthly average in terms of the number of colony forming units per 100 ml of the effluent to the ARG590001 permit.

In addition, there are EPA approved methods for determining the presence of

coliform, *Escherichia coli*, fecal streptococci, , and enterococci – see FAQ: NPDES Water - Quality Based Permit Limits for Recreational Water Quality Criteria April 2, 2015

( [www.epa.gov/sites/production/files/2015-09/documents/npdes-water-quality-based-permit-limits-for-recreational-water-quality-criteria-faqs\\_0.pdf](http://www.epa.gov/sites/production/files/2015-09/documents/npdes-water-quality-based-permit-limits-for-recreational-water-quality-criteria-faqs_0.pdf) ) retrieved 19-January-2017.

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