

**From:** [Byron Eubanks](#)  
**To:** [Water Draft Permit Comments](#)  
**Subject:** comment on ARG590000  
**Date:** Thursday, April 14, 2016 8:15:56 AM

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I'm writing to oppose the renewal of the National Pollutant Discharge Elimination System (NPDES) General Permit (ARG590000) that was published on March 15, 2016 in the Arkansas Democrat-Gazette for eligible operators of Concentrated Animal Feeding Operations (CAFO) in the State of Arkansas.

While we need agricultural production in Arkansas and need to avoid undue burden on our farmers, this General Permit (ARG590000) seems to have streamlined permitting to such a degree that it approved a large scale swine factory CAFO located in a fragile ecosystem in a highly fractured soluble limestone rock (i.e. Karst) that drains via surface and groundwater directly into our Nation's first designated National River, the Buffalo National River. The resulting controversy has resulted in significant "on-going" public opposition, considerable litigation expenses, and several hundred thousand dollars of tax payer money being allocated for "research" at this CAFO . I do not want this permit to be utilized to facilitate the permitting of another CAFO in Arkansas. Insofar as this permit by-passes well established science, it is likely its shortcomings will occur again if General Permit (ARG590000) is renewed.

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