

**From:** [CK](#)  
**To:** [Water Draft Permit Comments](#)  
**Subject:** Renewal of NPDES General Permit ARG590000  
**Date:** Wednesday, April 13, 2016 10:36:38 PM

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Dear Arkansas Department of Environmental Quality Permits Section,

The Audubon Society of Central Arkansas (ASCA) asks that you not renew the National Pollutant Discharge Elimination System (NPDES) General Permit ARG590000 for Concentrated Animal Feeding Operations. The controversial permit granted to C & H Hog Farms near the Buffalo National River has resulted in ongoing negative publicity for the state along with the threat of dangerous pollution to that area's surface and subsurface waters. It is not just Arkansans, but concerned people around the nation, who wonder how ADEQ could have issued a permit that threatens water quality in the Buffalo National River, our nation's first national river.

The Buffalo National River and park generate tens of millions of dollars in economic activity in an area of the state that desperately needs every one of those dollars. C & H Hog Farms puts those ecotourism dollars at risk.

The issuance of the permit to C & H Hog Farms was a mistake. Let us not compound past mistakes by risking future mistakes of this magnitude. The NPDES General Permit ARG590000 has proven to be extremely costly to Arkansas. Issuance of the C & H Hog Farms general permit has resulted in more than a half million Arkansas tax dollars needlessly spent to determine the extent of subsurface contamination of the karst formations in that area. Those funds could have been better used to educate Arkansas youth, to clean up existing contamination of Arkansas water bodies and provide other needed services to the citizens of this state.

ASCA requests ADEQ staff **deny** the proposed renewal of NPDES General Permit ARG590000.

Sincerely,  
Cindy Franklin  
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