

April 13, 2016, Comments to Arkansas' General Permit ARG590000

**Water-Draft-Permit-Comment@adeq.state.ar.us**

Arkansas's General Permit ARG590000 is too vague. If Arkansas wants its own general permit then it needs to stand up to provide more restrictive guidelines for Concentrated animal feeding operations (CAFO) and look to other states for more conservation minded permits possibly from other states.

No CAFO's should be allowed to be built on karst. Arkansas has shown it is not ready for a general permit such as ARG590000 due to its first, ARG590001, being placed on karst and a continual threat to the Buffalo River Watershed, wells, springs, and historical uses. ADEQ has lost sight of its goals and continues to support polluting the Buffalo River watershed by writing a permit for EC Farms, 3540-WR-7 and expanding EC total permitted waste application gallons from 478,000 gallons to 6.6 million gallons. ADEQ shows it is not going to abide by the moratorium and Regulation 5.901 by even accepting this application though there is no facility, no operator and no hogs. This makes the appearance of preparing for C&H Hog Farms to go to a Reg 5 permit without opening the permit for public involvement. C&H will then have 2 permits to expand on in the Buffalo River watershed. Jason Henson told the Joint House & Senate Agriculture Committee in Dec 2014 he plans to expand when able. The faulty Environmental Assessment done by SBA/FSA did not include any data BCRET had collected. This data shows Big Creek was impaired by July 2014 only one year after ADEQ permitted ARG590001.

All nutrient management plans should be done by qualified nutrient management planners. These planners should be trained in the counties they are to write the permits for. The case with ARG590001 is that the nutrient management planner, Monica Hancock, Yell County, Ar does not appear to have an understanding of highly erodible soils or karst. She writes a permit for spreading waste in January at near 2000' elevations in Arkansas.

Public notices need to be made in all county offices, each school child should take a notice home, bulletin boards throughout the community, along major roads, etc. Just posting in a newspaper doesn't get the majority of the residents, such as Newton County.

Environmental Assessments should be made prior to permitting any general permit, especially a discharge permit. These assessments should be made from a certified agency within the state and as close to the county of origin as the permit. This assessment should include a survey of all properties and be of high quality.

It is ADEQ's responsibility to assure the information that is presented to the public is accurate in every way prior to putting this documentation on the web site and approving this application.

**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. This General Permit (ARG590000) streamlined the permitting for a large scale swine factory CAFO that is 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, which has resulted in significant "on-going" public opposition. I do not want this permit to be utilized to facilitate the permitting of another CAFO in Arkansas. This General Permit (ARG590000) generated a permit that is highly controversial resulting in considerable litigation expenses and several hundred thousand dollars of tax payer money being allocated for "research" at this CAFO. Insofar as this permit by-passes well established science, it is likely its shortcomings will occur again if General Permit (ARG590000) is renewed.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol Bitting". The signature is written in a cursive style with a large, looping initial 'C'.

Carol Bitting HC 73 Box 182 A , Marble Falls, Ar 72648

**From:** [Carol Bitting](#)  
**To:** [Water Draft Permit Comments](#)  
**Subject:** ARG590000  
**Date:** Wednesday, April 13, 2016 3:14:48 PM  
**Attachments:** [General Permit Public Comment \(2\) \(1\).pdf](#)

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Please see my attached comments and reply that they were received. Thankyou,  
Carol

*“Wilderness is not a luxury but a necessity of the human spirit, and as vital to our lives as water and good bread.”*

*Edward Abby*