

From: [Gene Staggs](#)
To: [Water Draft Permit Comments](#)
Cc: info@governor.arkansas.gov; Goff, Patricia
Subject: NPDES General Permit (ARG590000)
Date: Monday, March 28, 2016 7:00:44 AM

We are 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 the Concentrated Animal Feeding Operations in the State of Arkansas. This General Permit (ARG590000) streamlined the permitting for one single CAFO, one that is located in a fragile ecosystem in the highly fractured soluble limestone rock (karst) that drains via surface and groundwater directly into the tributaries of the Buffalo National River. As you know, CAFOs on karst have resulted in significant ongoing public opposition in the U.S. and Europe, with very good reason. I do not want this permit to be utilized to facilitate the permitting any other CAFO in Arkansas unless adequate sewage treatment is provided. The NPDES permitting process is supposed to take into consideration scientific knowledge about the impact of the discharge on the environment. As proven in a court of law the permit request was very inadequate in providing scientific evidence that this waste would not negatively impact the Buffalo River and its tributaries. Arkansans are now paying \$300K a year to try to justify the inadequacy of this permitting process.

Over past years, the ADEQ and especially the Water Division has made great strides in protecting the waterways of Arkansas. I have seen first hand the negative impact of past dumping of salt water onto the land in Southwest Arkansas and dumping untreated sewage into our waterways all over our state. The Water Division has achieved much in proper regulation and enforcement of rules in the proper handling of salt water and sewage disposal in Arkansas. I am surprised, disappointed and concerned that the rules around the proper handling and disposal of hog waste from this CAFO have not been based on proper scientific consideration of the impact on ground water as well as surface water that ends up in the Buffalo River and tributaries. I understand that the hog farm generates as much sewage as the town of Harrison, AR. I doubt that you would permit Harrison to spray all their sewage over these same 600 acres. Should not the hog farm also have to provide a sewage treatment plant to treat this waste, just as Harrison must provide?

Please do NOT renew this General Permit (ARG590000).

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