

From: [Jeffrey Ingram](#)
To: [Water Draft Permit Comments](#)
Subject: National Pollutant Discharge Elimination System (NPDES) General Permit (ARG590000) comment
Date: Wednesday, March 30, 2016 11:36:16 AM
Attachments: [General Permit Public Comment .docx](#)

Jeff Ingram
916 Washington. Little Rock, AR 72204
Deny permit request

TO: ADEQ

From: Jeff Ingram, 916 Washington. Little Rock, AR 72204

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.

More money can be made from keeping the rivers clean through eco-tourism and recreation. Also, the whole ADEQ permitting process is an embarrassment to your organization and the citizens of our state. Our children will all likely be obese and have cancer, dementia and worse ailments because of the permitted poisoning of our environment ADEQ supports.

There are several aspects of the permit that should make it unacceptable.

- "Land application activities at these sites should not impact the Buffalo River due to best management practices..." The application fields have significant slopes; What ADEQ considers best management practices are flawed; and they are in fact close to the Buffalo River as they are all direct tributaries.
- The soil and water near application fields must be monitored more than once every 1 and 5 years. Your proposed minimal analysis is not adequate and the areas should be monitored several times a year and the operation shut-down if it exceeds limits. The established phosphorus limits are also too industry friendly and inadequate.
- How could ADEQ be so naïve or corrupt to claim that swine fecal water discharged will not runoff to waters of the state? The fields are adjacent to

direct tributaries of the river and fecal bacteria and nutrients will overload waters of the state.

- UAEX water monitoring guidelines are inadequate – they are written but industry and agriculture interests and should be more stringent.
- C&H employees and equipment are not sophisticated enough to properly measure maximum application rates. They received no training, their record keeping has proven to be sloppy, and their discharge hoses do not have appropriate measurement valves to determine application rates per acre.

There are numerous other glaring flaws in the permit but ADEQ has continually demonstrated that they serve industrial agriculture and chemical interests and corporate factory farms more than the people of Arkansas -- so why waste my time?

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