

April 13, 2016

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.

Furthermore, when the C&H CAFO was permitted under the referenced General Permit (ARG590000), where and when was the **Permit to Construct** for this facility issued? At what time period and where was the **required public notice published for the Permit to Construct?** As you are aware, the **Permit to Construct** is a separate issue and has been on-going process required by ADEQ for years. I'm not interested in any modifications (**e.g. after the fact**) to any regulations that may address this issue since C&H was permitted and constructed to operate. As you are aware, the Director of ADEQ, the majority (99.9%) of the general public as well as the ADEQ staff that were located approximately ten miles (e.g. Jasper, AR) from the CAFO were not aware of this blight that ADEQ approved. **To date, the Permit to Construct the C&H CAFO has not been adequately addressed by ADEQ. Therefore, I'm requesting a definitive answer pertaining to this pertinent issue immediately!**

John Murdoch
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From: [J. Murdoch](#)
To: [Water Draft Permit Comments](#)
Subject: Renewal of General Permit (Please use this last version instead of the one sent earlier)
Date: Wednesday, April 13, 2016 4:03:43 PM
Attachments: [Gen. Permit Ren F.pdf](#)

I just sent in my comments for the Draft Renewal of General Permit (ARG59000). I would appreciate you replacing those comments with this attachment. My sincere apologizes for any confusion this may have caused.

John Murdoch