

Speaker #3

April 14, 2016

To ADEQ Director  
Ma. Becky Keogh,

I am opposed to the renewal of National Pollutant Discharge Elimination System as published on March 15, 2016 in the AR Democrat-Gazette for eligible operators of CAFO in Arkansas. My reasons are these:

- ① I feel the proposed changes to the permit need to include much stronger language to restrict or eliminate any CAFO's <sup>being</sup> ~~to~~ build and operate in fragile ecosystems and watersheds, specifically Karst geology and watersheds of ERW and National Rivers in Arkansas and in the United States.

cont.

② The general permit needs to be much stricter regarding the points I previously mentioned and the permitting agency needs to be held culpable if permits are issued in an environmentally sensitive area when geological red flags (such as Karst) and ERW's are affected by the issuance of this permit.

③ ADEQ needs much stricter regulation and oversight, and significant ground work and research must be done prior to the permit being issued by the agency.

④ If any of these requirements are not followed in good faith with diligent efforts to inform the public ADEQ should be held accountable.

and severe fines should be levied against the agency. (3)

(3) The state or Federal agency should be responsible for the cost of any "research" needed to determine if the CAFO is indeed degrading the ground water, air quality or any waterways impacted.

These are just a few of the points I believe should be considered and modifications implemented before any new CAFO general permit (ARG 590000)

Respectfully,

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