

speaker #2

4-14-16

Reg 6 590000 general permit renewal comments

Director Keogh:

ADEQ must review its draft of a final Reg 6 CAFO general permit. In fact, ADEQ must ultimately decide that a general NPDES permit is not suitable for swine CAFOS in Arkansas at all.

ADEQ needs to include language that requires an individual, "boots on the ground" inventory by a professional hydrogeologist of any site proposal located in the karst geology of northern Arkansas before granting an individual permit. Most rural residents drink from wells and springs in the Ozark plateau. Because of karst surface to groundwater connectivity, everyone's a water neighbor in this area. Many get their drinking water straight out of their springs which flow up from channels that are often close to the surface or from perched aquifers. You know the golden rule, and it is no less applicable when it comes to the water we share.

I stand wholeheartedly behind the comments made by the Buffalo River Coalition, which includes the Buffalo River Watershed Alliance, the Arkansas Canoe Club, the Ozark Society and the National Parks Conservation Association. I oppose renewal of ARG590000.

It is time to change the regulations to suit the water realities we must all live with every day. A general permit cannot work in the best interests of the people of Arkansas, nor of any other sensitive surface to groundwater interfaces that would be incumbent with the renewal of a general permit.

Swine waste is not benign. When spread at unacceptable agronomic levels it is a pollutant. With the excessive amount and constituents of waste generated by swine CAFOs, it is rarely possible to use it all beneficially as nutrient or fertilizer.

ADEQ employees repeat at public hearings time and again that they are just following the regulations in place. It is time to recognize this as a need to review the regulations and require individual permits that reflect the conservation and preservation of a high quality water supply for our children's future.

Arkansas is rich in water. Let's treat it as the treasure it is and leave a heritage our grandchildren will be thankful to have.

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