

Thanks for the opportunity to make comments tonight. My name's Gordon Watkins, I live in Parthenon, Arkansas. And I'm speaking tonight on behalf of the Buffalo River Coalition which is composed of the Buffalo River Watershed Alliance, the National Parks Conservation Association, the Arkansas Canoe Club, and the Ozark Society. I've submitted comments online, so I won't take up too much time reading through all of these, but I'll touch on a couple of points that were kind of touched on during the Q&A period. Unlike other facilities typically covered by the Reg. 6 NPDES General Permitting Program such as publically owned treatment works, wastewater treatment facilities, small construction sites, pesticide applicators; CAFOs, particularly swine operations, produce a significant amount of untreated animal waste, which is potentially hazardous to human health and the environment. There's a distinct risk of application of waste in excess of agronomic needs, as well as the possibility of waste discharge in a storm event, both of which could lead to runoff or ground water contamination. An example of such excess of application can be found in the sole facility currently permitted under ARG590000. The most recent soil reports for this operation show that after three years of waste applications all but one of the fields sampled now have soil test phosphorous levels which are above optimum for the crops being produced. Further waste applications to these fields would be in excess of agronomic needs, increasing the risk of runoff and groundwater contamination. And think that's where it goes from being waste management to waste disposal. These risks are amplified in environmentally sensitive locals such as karst areas and watersheds of ERWs. It's therefore important to undertake a thorough site specific evaluation, including consideration of hydrogeological factors for each CAFO permit application to avoid karst locations. Such individualized site specific evaluation is contrary to the concept and the intent of the general permitting program, and is more appropriately carried out under the Reg. 6 individual permitting program. Therefore Regulation 6, ARG590000 should not be renewed and instead all new or renewal applications for CAFOs should be required to seek coverage exclusively under the Regulation 6 NPDES individual permitting program which best regulates the facilities unique location, permit conditions, and limits. Thank you.

I'm Marty Oleson; I live in Panka, PO Box 104 Panka. 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 Plato. Because of karst surface to ground water 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 interest of the people of Arkansas nor of any other sensitive surface to ground water interfaces that would be incumbent with the renewal of the 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 thankful to have.

Good evening, my name's Laura Timbey and I live in Gilbert, Arkansas, the only incorporated town on the Buffalo National River. We celebrated our centennial two years ago and it is well known as the coolest town in Arkansas. There's a story behind that, but I won't go into that tonight. What I'd like to talk about tonight, and this is a first for me two meetings like this in one week in Jasper, so there's a lot of information to try to understand. I do believe that I did see where the general permit, they're tweaking it, there are some more positive things. But until we see that they acknowledge that this area of the Ozarks is karst terrain and until they are very clear about staying out of its sensitive watersheds and ERWs, we can't have the general permit, unless it addresses those things. Thank you.

My name is Bill Lorde; I live in Parthenon, Arkansas. And as a 22 year veteran of the solid waste industry, I was present when in the early mid 1990s the Arkansas legislature passed a plethora of legislation designed to protect the public health and establish an orderly and effective system of managing solid waste, including stringent standards for construction and maintenance of landfills and transfer stations and the posting of financial assurance mechanisms to cover any pollution migrating off the facility site. As part of that effort, the new laws required a more stringent standard for protection of the surface and groundwater in state's karst region known as the Boone St. Joe Formation, which covered most of the Northwest Arkansas section of the state and includes Newton County. These laws were codified into what became the Arkansas Department of Environmental Quality's Regulation number 22. It is significant to note that ADEQ defines karst as an unstable area. In Regulation 22.407.B Unstable Areas, it states in part that "unstable areas can include poor foundation conditions, areas susceptible to mass movement, and karst terrain." Regulation 22.407.B.5 further states that "karst terrain means areas where karst topography with its characteristic surface and subterranean features is developed as the result of dissolution of limestone, dolomite, and other soluble rock. Characteristic physiographic features present in karst terrain, include but not limited to, sink holes, sinking streams, caves, large springs, and blind valleys." The legislature and the Department of Environmental Quality further outline requirements for construction of solid waste facilities in karst formations in Regulation 22.425.A-L. These higher and more extensive standards address all areas of landfill construction, monitoring, and maintenance. These regulations provide a higher level of protection for the region's groundwater and surface water supply. A copy of those regulations are attached to what I submitted this evening. In addition to these stricter standards, landfills and transfer stations are required to remove its toxic water to a permitted wastewater treatment plant that will clean it to the level of the national safe drinking water standards. Facilities are permitted to use their own in house treatment methods providing they can meet the safe drinking water standards. It is worth noting that the Newton County transfer station just south of here a little ways has to collect and transport its toxic water to the local wastewater treatment plant for processing and release. The Arkansas Legislature and the Department of Environmental Quality already determined the Boone St. Joe Formation is a unique geological region and require special consideration when it comes to handling waste and wastewater. It seems prudent to establish stricter standards for a confined animal operation.

I'd just like to add to his comments that in North Carolina, which I think is the second hog growing state, that they have no more new CAFOs, unless they incorporate some kind of waste system, waste treatment like he's talking about, because their rivers are already so heavily polluted from these kinds of operations. I'm Jenny Masullo; I live in Fayetteville, Arkansas. The Buffalo River Coalition tonight presented some well thought out and carefully researched changes to the draft renewal for the NPDES General Permit, Arkansas 590000. And there's been some other very well thought out comments tonight. The C&H CAFO is the only facility, as you said, that's under this permit and thus far the use of this general permit has had disastrous effects for both the C&H operation and the citizens of Arkansas. If I were Mr. Hinson, I'd be wondering if I was getting the proper guidance. Now we have the opportunity to make changes to this regulation, this permit, that are urgently needed. I've not seen the ADEQ through all of the brouhaha that has gone on the last three years, to the best of my knowledge, implement any of the comments that people have asked for or

suggested. I'm wondering if ya'll will listen to us now. I really, really hope so. I think additional language as some other people have said should be added that state that all swine AFO, CAFO permits, whether they're general or individual will not be permitted in the Buffalo National River Watershed or other karst areas of the state. And additionally, I think language should be added about application of swine waste to the land from CAFOs that might be outside of the watershed but want to bring their waste into the watershed. And that would be for operations that were over, say 350 head. My understanding about the sunset clause, and I'll talk to you about that later John, that that was a touch to the moratorium states that the ADEQ director could lift the moratorium at any time. And I request that in this permit that that language be included so that it's at least as permanent as the every five year rotation for reviewing the permit is. Thank you.

I'm Lynn Welford; I live in Green Forest, Arkansas. Thank you for this opportunity to express our opinions today. Since this is a state wide permit that's under consideration and had very little public comment when it was initially adopted, I am requesting the following actions. At least one additional meeting should be held in a more centralized location such as Little Rock, where the public can provide additional recommendations. It is a burden for folks who live in the southern part, areas of our state to drive all the way to Jasper for a public hearing. Again, I request additional hearing be held do to this permits state wide coverage. Secondly, I'm also asking for a 20 day extension of the comment period. According to Regulation 8.209.B6 "The presiding officer may extend the period for written public comments if announced at a public hearing for up to 20 calendar days." I ask you to extend the comment period. Thank you.

Thank you again for coming up. I also agree with the last speaker that we should have another hearing and I too would request an additional period for the comments, if possible to include more people to be able to come to these hearings and state their case. I think there are thousands of people who would like to comment on this. I am asking, my name is Kathy Downs; I live 7 miles west of Jasper on Mount Sherman. I'm asking ADEQ to please cancel and close the present permit given to C&H CAFO when the permit is up next fall. I think that the permit was granted hastily without close review of the problems inherent in placing a CAFO of this huge size on the karst topography of the Buffalo River. And I just want to say very clearly to the people, to the farmers who are here, we are not opposing small CAFOs, I am really opposing the hugeness of this CAFO. Many, many farmers have had small CAFOs here with not the problems that this one brings to us with 6,000 hogs. This is a huge, pollution is already occurring in an increased E.coli levels in local wells and nitrate and phosphate overloads. This is a huge polluting accident waiting and even now starting to happen. Spreading more hog waste will also make it worse. The permit being statewide should be revised to exclude CAFOs, huge CAFOs, large CAFOs in the Buffalo River Watershed. The moratorium now in place is proof that this is a huge concern. This permit should be closed and not reissued. The new permit should take into account the special porous rock of karst topography and the danger of polluting the water. Not to mention the air pollution, the odor that is already bothering neighbors. Regulation language should reflect the dangers of CAFOs on karst, so that the next permit issued will include language about karst and thereby keep pollution out of the tributaries and the Buffalo National River. This river belongs to all of us, to every citizen of the United States of America. And we beseech ADEQ to do everything possible to keep it clean and safe. I stand with the comments of the Buffalo River Watershed Alliance and I also stand behind Bill Lorde's comments about there's already language in the ADEQ about special consideration given to the Boone Formation here and the karst topography. Thank you.

My name is Kent Bohner and my address is HC 62 Box 656 Deer. And I first wanted to comment on the overflow discharge problem that ya'll said is going to be inevitable sooner or later anyway. The logical thing to do would be to have a dry pond waiting to take whatever overflow there is, catch it and then recycle it back into the system. That seems like that's a minor consideration that could be, you know could be addressed without leaving the chance of that happening. The main thing that concerns me is the flare and the concept of a flare. In your comment response to me on the flare the first time, you said that ya'll don't have the authority to deal with air problems and it implied that with Fish and Wildlife too. I think that you all need to have more interagency coordination with other groups, with other agencies, with other groups within your own agency. As far as being able to address these problems, because if you don't have the authority to deal with anything beyond water, you need to deal with the people who do, before you grant the permit because granting a permit for flare doesn't, if you don't have the authority to grant a flare permit, you shouldn't, it shouldn't be part of the process. Another problem that I see is the overload of the regional water system that this is creating. The hog farm takes the equivalent of a small city of water and that needs to be properly processed and it's real likely that that's going to overload the water system at some point to where it fails. And people's public drinking water is going to go down along with the hog farm. So, right now Lead Hill is paying for that CAFO under threat of their elected officials going to prison. And that's a real bad burden to be placing on the general public to support one operation. That's the main points I needed to make, I have written comments I'll submit too.

Bob Shofner, Centerton, Arkansas. I'd like to thank the ADEQ to allow for public comment tonight. I encourage the ADEQ to reissue the general permit ARG590000. I'd like to remind everybody the EPA Region 6 has reviewed this and has approved it. There are regulations in place today to protect the waters of Arkansas, there's enough regulations that we have on the books to take care of this. I'd also like to make the comment, there's no body been excluded. If they felt passionate enough about coming up here they can drive up here to Jasper, Arkansas. This is the area that local, where all this is at. Little Rock is not part of it; this is part of the water region of this part of the world. So they have every right to drive up here. So I don't feel that there's anything that is being excluded by anybody. This is a free country and they can get in their car and drive. I'd also like to say that there's been two environmental assessments done with no proof of any impact. I'd also like to remind folks that this operation covered under this general permit is a very good tax base for the small school, rural school of Mount Judea. Folks you don't realize in a lot of these areas that are economically depressed and does not have a lot of industry the amount of tax base that they bring in for the small school and the boost that they have for the community of these folks. Also I'd like to say that I'm standing for all local fifth generation farmers in the US. Everybody has vilified these two families, these families are very good upstanding people in their community and I don't understand why the reason why you've drug them through the mud like they have been. They are very fine individuals. You have vilified them to the point where, if it was a normal person, I just don't understand why. They are very good people. I also would like to also remind you that if, you all need to understand your soil conservation and your soil test, you keep asking to make reference to that, you're not education in that area, you need either have some soil degrees or work with an animal science degree. Again I would like to encourage the ADEQ to reissue this general permit. Thank you.

My name's Ed Manor, I live in Jasper, well actually a little south of Jasper. A couple of comments, earlier there was some question about thousands of people would like to make comment on this, I'm sure there is and I'm sure there's just as many people on the other side that would like to make comments in favor of the CAFO. As far as the gentleman had problem or question about the water coming out of Lead Hill, you don't have to worry we've got plenty of water. We got more than enough water to take care of the region and the CAFO. My comment is if the, the lady who said that the, asked about the regs being changed and how you would go about changing them. My question is if the regs are changed, what happens to the existing CAFOs? Would they not be grandfathered in? That's it.

My name is Jean Farr; my mailing address is PO Box 96 Lincoln, Arkansas. I would like to speak on this permit; I do feel that there needs to be a method of a general permit and I do recommend that this permit be renewed. I am a licensed nutrient planner. There's been a lot of concern about karst topography. One of the things a nutrient management planner does is look for evidence of sink holes, limestone coming out of the rocks, or out of the soil. And there is a setback on all of these items, I don't remember what it is right off, but I think your worries about litter being spread on karst topography are quite unnecessary. Thank you.

Thank you and good evening. My name is Dr. Nancy Howler and I live about 10 miles south of Jasper. I feel like those of us here tonight have to speak for all the people of the state since they can't be here, which is a pretty big burden. I am opposed to CAFOs in general. Not just CAFOs in Newton County, but CAFOs. You know, when you think about a little boy growing up and saying, I want to be a farmer, I can't think that this was what he had in mind to do. I can't think that this is the ideal of farming that we all have. The appreciation for the farmer providing our food supply, providing nutritious, wholesome food. This ain't it folks. And I was wondering do these farmers feel good taking their kids to work with them? And say look at what daddy does. Don't you want to grow up and be like daddy? I can't imagine. I'm also concerned as a physician with the health impacts of this. We're talking about animal waste that's very similar to human waste in terms of salmonella, shigella, E.coli, vibrio cholera all of these pathogens that cause disease in humans. If this gets in our water and our streams and our ground and somebody decides to water their garden out of the river, which people do, or out of their spring and they water their garden with polluted water, people have died of E.coli poisoning. And many people have been sickened with it. We don't know what the hormones, I know there's hormones put in these animals to make them grow faster, and there's antibiotics used, but nobody knows because these are trade secrets. So well at least we should know what's in it before we spread it all over everything. And I'm also concerned with the health of our community. CAFOs have been shown to decrease property values because of pollution, stinking, and all that sort of thing. So you know, some people make money and the rest lose money. Thank you, I appreciate it.

Hi, my name's Even Teague, address PO Box 31, Little Rock, Arkansas, 72211. I'm here representing the members of the Arkansas Farm Bureau Federation, 190,000 farm families state wide. Had some prepared comments here, I read through those quickly. Just to say, EPA Region 6 has reviewed the draft general CAFO permit and had no objections. If EPA has no objections, that means the permit's protective of the environment. We concur with their assessment of this permit. We encourage the Department of Environmental Quality to reissue this permit, unchanged, with the exception of those changes listed on page two of the fact sheet. The changes listed on those occurred after a two year period of negotiations with the environmental community to address public notification requirements, to incorporate liners in the lagoons, to address CAFOs of a certain size being permitted in the Buffalo River Watershed. The whole premise behind doing that was to address the concerns of the communities and to also allow the Big Creek Research and Extension Team to do their work to evaluate impacts of a farm that this permit's not specifically about tonight, but to give that evaluation and to look and see if that farm is having an impact, if any at all. Once that research is turned in and completed there's to be an evaluation of whether or not that moratorium should stay in place. That will happen at about 2019 or 2020. If the environmental community wanted additional changes in these permits at that point, they should have done it as part of that third party rule making. Now I will say that, I'm sitting back here and I represent farmers all across this state and I'm sick and tired of listening to people from the environmental community berate farmers, tell them they're uneducated, they don't know what they're doing, and say things that are not true. Hormones have not been used in animal feed for growth purposes since the 1960s. It's been banned. They're under the Veterinary Feed Directive. This farm is an antibiotic free farm; they're trying to produce hogs without using antibiotics. Occasionally they have to, like if your child gets sick, you're going to take them and get them treated, the animals, if they have a cold or

whatever it is, they need treatment, they will use antibiotics sparingly. So all this salaciousness about hormones and antibiotics is unfounded. That's my comments.

Hi my name is Jim Westbrook, I live on Mount Sherman, just west of here, PO 292 in Jasper. I'd like to get some of these comments into the records. Mike Masterson wrote an open letter in regard to the risk posed by this farm to our state's one and only National River. Many of us have been working to understand and cooperate with ADEQ over the past two years, sadly the conclusion that I have come to is that ADEQ seems to be working against the Buffalo National River's best interest, seemingly at every turn. They site regulation after regulation in regard to their pursuit of proper procedure, yet when there is hard data from USGS delivered to them by the National Parks Service with their recommendation to find these three tributaries as impaired, polluted, they decide that those rules need not be followed. The three tributaries we're talking about of course are Bear Creek, Big Creek, and Mill Creek. These three tributaries contribute about one third of the flow of the Buffalo National River. I can only conclude that there's some sort of political agenda at work within this agency. However, please don't get the impression that any of us have given up, we're in this for the long haul and we're gaining a great deal of expertise in regard to environmental policy. And I also want to add because the comments tonight, we have absolutely nothing against the Hinson's and Campbell's, not one thing. They are great folks and great citizens, it's just this farm is in the wrong place and it's entirely too big. Thank you very much.

I'm Jerry Masters; I'm the executive director for the Arkansas Pork Producers Association. And I want to thank ADEQ and their staff for the job that they do protecting the environment and working with all sides to make sure that we come to the best solution. Let me tell you, I'm proud to represent the pork producers of Arkansas, very proud. And I'll tell you, I think that Jason Hinson and the Campbell's take their children to their hog barn and they learn to work and they learn values of work. I think that's a great thing and I think if more children in the United States of America learned how to work in agriculture and learned a responsibility we wouldn't have the problems we have in this world. I know that has nothing to do with this CAFO permit but I think it has a whole lot to do with the character of the people that we're working with and the people that I represent, and believe me I'm proud to represent them. We've heard a lot of things tonight; we've heard a lot of fear. And I want you to follow me here, fear: that's false evidence appearing real. That's what we've heard tonight. When we think about the CAFO permit, and I ask that it be renewed, we've done a lot of different things or there's been somethings happen since the first CAFO came out. And Evan Teague touched on that, there's been additional language put to the public notice that was added after this CAFO was put in place. There's a third party rule making with a moratorium on large CAFOs in the Buffalo River Watershed. And we've got the Big Creek Research Team that's gathering data constantly on the Buffalo River next to C&H Hog Farm on Big Creek. And that research is tied to the moratorium and hopefully when we're done we'll know what the real results are and we're dealing with facts not false accusations. I just want to ask that this permit, that we renew the CAFO permit and we look forward to that renewal. Thank you.

Well good evening, my name is Chuck Bidding. I can be reached at HC 73 Box 176B, Marble Falls, Arkansas, 72648. I also live in Newton County, I live about four miles downriver of Jasper on the Little Buffalo. Tonight I'm here however not to talk for myself, I'm here to talk on behalf of the National Parks Service, in particularly Buffalo National River. And I definitely appreciate this opportunity. We've reviewed the draft permit ARG590000. We, the National Parks Service, opposes the draft permit in its current form as we feel that the proposed changes will make the permit less protective of water quality. We feel the importance of making this permit as protective of water quality as possible is necessary to the

health of the Buffalo River, our neighbors, and our million plus annual visitors. I'm going to go over a few general comments, we have a lot of specific comments which are far too lengthy to discuss tonight. The Clean Water Act requires ADEQ to establish and implement an anti-degradation policy. This policy applies to all streams listed as ERW, ESW, and NSW or tier 3 streams in the Clean Water Act. The draft permit does not appear to be protective of these tier 3 streams. The anti-degradation requirements set out in 40CFR require the state to protect and maintain the quality of water within these streams. In the 2008 303d assessment methodology, a tier 3 stream was considered impaired if its water quality dropped from the conditions present when it was designated a tier 3 stream. The 2008 assessment methodology was the last Arkansas assessment methodology accepted by EPA and as such it should be the guiding policy on anti-degradation in the state of Arkansas. The 300 foot buffer for tier 3 streams in this draft permit is unreasonable, cannot be expected to be protective of water quality within the stream. Big Creek Research and Extension Team actually is not the only source of good scientific data on water quality in Big Creek and the Buffalo River, its one source. In fact NPS staff have been sampling 32 stations up and down the Buffalo River and its tributaries since 1985. This body of data will have to be considered by ADEQ particularly since BCRET, Big Creek Research and Extension Team, does not even sample the Buffalo River. In addition to this NPS data, the United States Geologic Survey has been, has a station on Big Creek at Carver which is another source of very high quality data. Several citizen scientists are also collecting water quality data. Thank you.

Brian Thompson from Fayetteville, Arkansas. So, my comments are to tell you that I'm against the general permit. To me it's a one size fits all permit that really is inappropriate for our state. And I think the case of C&H is a perfect example. So with C&H you have a variety of risks. You have risks of slow degradation and you also have risks from catastrophic failure. For example a berm failure, if you have a big rain and that berm gets soggy and it gets, also since we're in a karst environment you could have a situation where the floor of one of those ponds gives way into an underground cavity. So, now before you accuse me of peddling fear, but let's talk about where those catastrophic risks would take us. So, if you have one of those things happen, you're going to have, first of all the integrator is going to throw up his hands and say this is a contract operation, I have nothing to do with this, we simply by this stuff from the farmer. Secondly the farmer is not going to be able to respond to the amount of damage and he's going to declare bankruptcy. I mean he's not prepared for something like that. So thirdly, now you've got a damaged tourism industry, a \$57 million industry and the people in the community are going to ask for economic assistance. Now who's going to pay for that, it's going to be the tax payer. It is going to be all of us. So I mean this a perfect example why these things need to be looked at individually. Now before you talk to me about fear one more time, you can go on the market and buy environmental, its environmental insurance to protect yourself. But I mean you're going to have to by about \$50 or \$60 million worth. So, you know, it is the cost of doing business in a high value area with a high risk operation. Thank you.

Hi, I'm Sue Gower, I live on the Little Buffalo at Jasper, PO Box 57, Jasper. Just to reiterate Mike Masterson's letter, they site regulation after regulation regarding the pursuit of proper procedure yet when there's hard data from the USGS delivered to them from the National Parks Service with a recommendation to find three tributaries as impaired, polluted. They decide that those rules need not be followed. These three tributaries contribute one third of the flow of the Buffalo River. We must change the regulations, our water is precious. Karst terrain needs to be studied further. Please cancel and close the permit. Public drinking water is already at risk. Six million gallons of waste dumped on the land that will run off into the water table, think about that.

My name is Bill Lord, I'm going to complete the comments I made earlier, just a paragraph or so here. It says the Arkansas Legislature and the Arkansas Department of Environmental Quality have already determined the Boone St. Joe Formation is a unique geological region and requires special consideration when it comes to handling waste and wastewater. It seems prudent to establish stricter standards for confined animal operations that want to deposit their wastewater in the karst Boone St. Joe Formation. The legislature and the department deem these actions necessary to preserve the unique region and its land and water resources. Additionally they place the financial burden of these different requirements on the industry. As you consider changes to the general permitting process, I request that you one, require confined animal feeding operations in the Boone St. Joe Formation remove their toxic wastewater to a permitted treatment plant or install and maintain an onsite system capable of treating the wastewater to drinking water standards. And two require all CAFOs in the Boone St. Joe Formation obtain individual permits and three that all CAFOs, like solid waste facilities, provide financial assurances in the event their operation contaminates land and water outside their ownership. It should be noted that all solid waste facilities must post financial assurance, even those using the general permit. In my estimation, that is the least the department can do to fulfill its obligation to protect the resources of the Natural State. Your predecessors took that bold step I think you should as well. Thank you.

My name's Chuck Bidding and I know you're getting tired of hearing me. So, continuing on, I want to thank Bill for his comments because he took away about a minute of mine. Several citizen scientists are also conducting water quality collections on Big Creek and the Buffalo River and the surrounding environs. These groups are using EPA accepted methods and procedures to collect their data and certified labs to process their samples. These data would also have to be accepted. Additional biological data on fish and macroinvertebrates are also being collected by National Parks Service, USGS, Arkansas Game and Fish, and other researchers using standard collection methods. And finally bat monitoring and roosting surveys are being conducted throughout the watershed by National Parks Service, US Forest Service, US Fish and Wildlife Service, Nature Conservancy, Arkansas State University, Arkansas Tech University, and the Cave Research Foundation, among others. This data would also have to be part of the decision. The moratorium in Regulation 5 and 6 does not give ADEQ authority to decide what data to use and what data to throw out. We're concerned additionally, the system of holding public meetings at the end of the comment period is a problem, as this is too little too late for many people to make their comments. We believe that in order to better protect the health of citizens and our natural environment, large and medium CAFOs are more properly permitted with individual permits. The public does not have adequate opportunity to address their concerns to ADEQ under the current system. And that concludes my comments. Thank you all.

Again, Bob Shofner, Centerton, Arkansas. I'd also like to make the comment that in the rulings, landfill waste and animal waste are not considered the same. Animal waste is not considered landfilled waste. I'd also like to remind everybody that in the outcry of protecting the river, we also need to remind that the Tyler Bend National Parks Service has also got a discharge, or a not point source applying within feet of the river. Where is the outcry for the Boone karst for that? I just want to remind you of that. Also you talk about the, in the past of it being oh this is bad for the tourism, when is tourism is up and as I indicated before where does the 1.8 million people go, whether their floating on the river, it's directly into the river. These folks are applying through a non-point source miles away from the river and Mother Nature does a good job on cleaning up the environment herself. Thank you.