

From: [Rex Robbins](#)
To: [Water Draft Permit Comments](#)
Subject: ARG590000 General Permit for CAFO Land Application
Date: Wednesday, April 13, 2016 3:14:59 PM

I would like to submit the following comments regarding the general permit for CAFO Land Application. There are several areas in the permit which do not meet the needed level of scrutiny for a group of facilities that potentially could have this much impact on the public good.

Comment 1: It should be understood that this is a general permit and in some ways should be stricter than an individual permit for a similar facility. The review process associated with individual permits allows for a review of specific situations which might not be applicable to all similar facilities.

Comment 2: The stated slope requirement in Section 14.2.1.7 of the permit might be appropriate for dewatered solids, but is not appropriate for liquid wastes that can quickly migrate to a surface water. A slope of 7% has been applied in other land application permits and represents a maximum for this type operation. The subsection should be changed to incorporate language such as:
Wastes should not be surface applied to slopes with a gradient greater than 7%. Any proposed subsurface application must be accompanied by an analysis of soil conditions and methods of injection. The permittee must demonstrate compliance with slope requirements based on a topographic analysis (minimum 2-foot contours). Any soil grading to meet this requirement on any field greater than 1 acre must be preceded and covered by a stormwater construction permit.

Comment 3: The closure plan requirements in Section 1.10 should include a provision for financial assurance in the event that the permit holder is not financially able to pay. The permit application should include a cost estimate of the closure costs as performed and stamped by a professional engineer.

Thank you for the opportunity to submit these comments.

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