

From: [Sam Cooke](#)
To: [Water Draft Permit Comments](#)
Subject: Comment on Draft Renewal Permit ARG590000
Date: Thursday, April 14, 2016 12:53:45 PM
Attachments: [Letter to Office of Water Quality.docx](#)

Please accept the attached file with the letter of comment.

Sam Cooke

April 14, 2016

Arkansas Department of Environmental Quality
5301 Northshore Dr.
North Little Rock, AR 72118-5317

ATTN: Office of Water Quality

RE: Notice of Draft Renewal Permit ARG590000 published March 15, 2016

Dear Office of Water Quality,

These comments are submitted in behalf of Friends of the North Fork and White Rivers (FNFWR), an Arkansas non-profit watershed organization for the middle White River watershed.

FNFWR is opposed to the issuance of a renewal of general permit ARG590000 for confined animal feeding operations (CAFO). All CAFOs should be required to apply for individual permits with site specific terms as required by the ADEQ.

The C&H Hog Farm coverage under the general permit is an example of why individual permitting should be required of CAFOs.

- Studies by Big Creek Research and Extension Team (BCRET), the Karst Hydrogeology of the Buffalo National River (KHBNR), and the National Park Service (NPS) indicate that discharge from the C&H Hog Farm and land application sites have resulted in significant adverse environmental impact upon Big Creek and contiguous water drainages that are tributaries to the Buffalo National River (BNR). The NPS, as a result of their studies, have claimed that the waters of Big Creek no longer meet designated use as established under the Clean Water Act.
- It is well documented by the hydrogeologists (Van Brahana, Tom Aley) Big Creek and BNR lie in the midst of a mantled karst terrain that contains unique, complex, and sensitive ground water bodies.
- Massive amounts of raw hog manure enter the Big Creek watershed by land application of manure and leakage from the C&H Hog Farm storage ponds. Hydrogeologist, Tom Aley, estimates that 6,150 gallons of raw hog manure, per

day, leaks from the two storage ponds into the ground water drainage of Big Creed and BNR, representing “major environmental degradation”.

- Numerous science-supported methodologies exist that are karst-specific and are able to provide a thorough characterization of karst waters and their relationship with surface waters. Little use of these methodologies was made in the determination of the original general permit status for C&H Hog Farm.

FNFWR urges the ADEQ to utilize its discretion, as provided by state and federal law, to require an individual permit for the C&H Hog Farm operations.

Swine CAFOs in particular represent significant and unique risks of environmental degradation of the waters of the state. The public should be afforded a much greater opportunity for participation in the decision making process in permitting that is allowed by the general permit. The residents of Arkansas deserve a greater degree of protection of their health than what is provided by general permitting of swine CAFOs.

Sincerely,

Sam D. Cooke

President, Friends of the North Fork and White Rivers