

From: [My Blue Heaven](#)
To: [Water Draft Permit Comments](#)
Cc: [My Blue Heaven](#)
Subject: Comment of Opposition to Renew of General Permit (ARG590000)
Date: Thursday, April 14, 2016 11:04:28 AM

Director Keogh, Members of the Water Dept and ADEO Staff,

I'm writing to oppose the renewal of the National Pollutant Discharge Elimination System (NPDES) General Permit (ARG590000) that was published on March 15, 2016 in the Arkansas Democrat-Gazette for eligible operators of Concentrated Animal Feeding Operations (CAFO) in the State of Arkansas.

This General Permit (ARG590000) streamlined the permitting for a large scale swine factory CAFO that is located in a fragile ecosystem in a highly fractured soluble limestone rock (i.e. Karst) that drains via surface and groundwater directly into our Nation's first designated National River, the Buffalo National River, which has resulted in significant "on-going" public opposition. I do not want this permit to be utilized to facilitate the permitting of another CAFO in Arkansas. This General Permit (ARG590000) generated a permit that is highly controversial resulting in considerable litigation expenses and several hundred thousand dollars of tax payer money being allocated for "research" at this CAFO. Insofar as this permit by-passes well established science, it is likely its shortcomings will occur again if General Permit (ARG590000) is renewed. Permits should be site specific and not one size fits all. CAFO's should be not be allowed on top of Karst topography in the Boone formations of Arkansas.

This permit should be banned permanently going forward. ADEQ must be held responsible for the damage done to the waters of the state in allowing the only General Permit (ARG590001) in Newton County in karst topography with no regard for the rights of the citizens of Arkansas for safe water.

I have little confidence in ADEQ's willingness to do it's job after witnessing continued denial of the facts and refusing to adequately monitor the C&H Hog Factory as it pollutes and degrades our precious water.

I am deeply disturbed by the ADEQ's indifference in following it's mandate to protect the waters of the state. Your lack of action with regard to C&H being allowed to degrade the waters of the state with millions of gallons of raw hog waste leaked into Big Creek and reaching the Buffalo National River demonstrates that you are so influenced by the Arkansas Farm Bureau and the Arkansas Pork Producers that the agency has ignored the public good in favor of the powerful Ag lobby.

ADEQ bends the rules continually for C&H Hog Factory and refuses to look at the science. The BCRET has spent hundreds of thousands of taxpayer dollars and three years. Then does not interpret it's data. All the while C&H is leaking millions of gallons of raw, bacteria laden hog waste into our fragile water table. The National Park Service, USGS and Dr. Van Brahana have all shown ill effect to Big Creek and the Buffalo National River. There should be no renewal of the General Permit. To date the one farm, C&H Hog Factory, currently allowed this permit, has cost the taxpayers and citizens huge sums of money and untold hours of ADEQ staff time defending it and yet allows the degradation of the waters of the state. The staff repeatedly talks in circles making excuses when ask relevant questions but takes no action to protect the public. This General permit is basically flawed and puts our health, well-being and water resources at risk.

I strongly oppose the renewal of General Permit ARG590000. In an effort to streamline the permit to favor big Ag you have failed to protect the public health and the waters of the State of Arkansas which directly opposes the stated mission of ADEQ.

Respectfully submitted,

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