

To ADEQ,

06/02/2016

In reference to a Regulation 6 General Permit #ARG590001 requesting Regulation 5 individual permit under #5264-W I would like these comments to go on record.

The ARG590001 permit was placed in a newspaper in Pulaski County under a name unknown to any local or Arkansas resident, this permit went unnoticed by Newton County residents and most Arkansas taxpayers. There was no mention of the Buffalo National River (BNR) and no mention of Big Creek. Only a few ADEQ staff & a few residents were aware of the filing of this large confined animal feeding operation application in Mt. Judea, Ar.

Now that C&H has been in operation under a National Pollutant Discharge Permit and is up for renewal they have asked for an individual Reg 5 permit with no renewal attachments. Regulation 5 permits at the time of the original filling had a much more stringent public notice requirement than the Regulation 6 General Permit. This regulation has since been revised to include more stringent notification, but only after a large cafo was permitted in the BNR watershed.

The ARG590001, NPDES permit is under the federal supervision of the Environmental Protection Agency as well as the state supervision, Arkansas Department of Environmental Quality . This cafo with its high potential to pollute water was placed on karst in the watershed of the First National River, an Extraordinary Resource Water, therefore surveillance should be at the highest level to protect the waters of this state described in Regulation 2.

C&H Hog Farms, ARG590001, by design and all visual appearances is discharging into the waters of this state. The lagoons, as so stated, are allowed to leak according to the NPDES permit over 7,000 gallons daily. Due to this discharge factored into the original permit and no proof there is not leakage, C&H owners are knowingly discharging while seeking a Regulation 5 "no discharge" permit.

The presence of a large swine cafo in a tributary to the Buffalo National River with funding from the state of Arkansas (BCRET) to monitor the impacts to the Buffalo River has shown that Big Creek is impaired for e-coli and the USGS & NPS data show Big Creek is impaired for dissolved oxygen (see data presented to ADEQ prior to the State's 303-D impaired waters listing by the NPS & BCRET). Due to the visual appearance of Big Creek and the BCRET, NPS and USGS data results it appears there is discharge into the streams, springs and waters of the state. I ask you to deny this application change to a Regulation 5 individual permit due to discharge and or the lack of evidence they are not discharging.

If ADEQ director, Becky Keogh, approves this new application of a large confined animal feeding operation in the Buffalo River watershed I request a public hearing.

Sincerely,
Carol Bitting
HC 73 Box 182 A
Marble Falls, Ar 72648

From: [McWilliams, Katherine](#)
To: [Deardoff, Amy](#)
Subject: FW: ARG590001_5264-W
Date: Monday, June 06, 2016 8:29:56 AM
Attachments: [ARG590001_5264_W Comments.pdf](#)

5264-W

Thanks.

From: McWilliams, Clark
Sent: Friday, June 03, 2016 7:30 AM
To: McWilliams, Katherine
Subject: FW: ARG590001_5264-W

From: Carol Bitting [<mailto:lcbitting@gmail.com>]
Sent: Thursday, June 02, 2016 8:22 PM
To: McWilliams, Clark
Subject: ARG590001_5264-W

Katherine,

Please find attached my comments to the request for a new swine application in the Buffalo River Watershed. Let me know if you have trouble opening the attachment.

Carol

We will Win, or We ALL LOSE....Save the Buffalo River Watershed.