

EXHIBIT C

ADEQ REVIEW AND CORRESPONDENCE



ARKANSAS
Department of Environmental Quality

December 28, 2018

Mr. Greg Phillips
GBM^c and Associates
219 Brown Lane
Bryant, AR 72022

Re: Revision to 2012 and 2016 Poteau River Study Section 2.306 Site Specific Water Quality Study

Dear Mr. Phillips,

The ADEQ Office of Water Quality-Planning Branch thanks you for the submission and meetings to discuss additional physical, chemical, and biological data for the Poteau River site-specific water quality study and updated alternatives analysis. The 2016 Study Addendum provided supplemental data to better document whether the aquatic life designated use was supported in the Poteau River upstream and downstream of the unnamed tributary that discharges Tyson-Waldron's effluent. The 2016 study design expanded work done in 2012 by including three additional sampling locations, two on the Poteau River and one tributary.

Pursuant to Ark. Code. Ann. 8-4-202(c), the Tyson Poultry, Inc. Waldron Facility has initiated rulemaking with the Arkansas Pollution Control and Ecology Commission (APC&EC) to amend site specific chloride, sulfate, and total dissolved solid (herein, minerals) criteria in Regulation 2 (Minute Order 13-17). In support of this amendment, the permittee has completed, in accordance with an ADEQ approved work plan, an evaluation of aquatic life to support site-specific mineral criteria for Poteau River segment (11110105-031). Fish and macroinvertebrate assemblages (herein, aquatic life) were evaluated using current ADEQ methodologies for aquatic life designated use attainment decisions. Data evaluated with these methods indicate that aquatic life designated use within the Poteau River upstream and downstream of the unnamed tributary, which contributes Tyson Poultry, Inc. Waldron Facility's effluent, is comparable to ecoregion and reference stream conditions.

At this time, the Office of Water Quality has no objections to Tyson Poultry, Inc. Waldron Facility submitting a second Petition to Initiate Rulemaking for revised site-specific criteria for the Poteau River.

If you have any questions or comments, please feel free to call 501-682-0660 or email me at clem@adeq.state.ar.us

Sincerely,

A handwritten signature in black ink, appearing to read "Sarah Clem", is written over a horizontal line.

Sarah Clem
ADEQ Branch Manager
Water Quality Planning Branch
Office of Water Quality

Cc: Allan Gates, Mitchell Williams