

From: dane schumacher [mailto:dane.schumacher@yahoo.com]

Sent: Monday, June 16, 2014 3:51 PM

To: Szenher, Doug

Subject: Comment to APCE re 3rd Party Rulemaking to Ban All Medium and Large CAFOS

Please accept the following comment with regard to the third-party proposal to prohibit the ADEQ Director from issuing Regulation No. 5 permits for Confined Animal Operations, and Regulation No. 6 permits for Concentrated Animal Feeding Operations, for facilities in the Buffalo National River Watershed with either 750 or more swine weighing 55 pounds or more, or 3,000 or more swine weighing less than 55 pounds.

Let the record reflect that I am in full agreement with the Arkansas Pollution Control and Ecology Commission's Minute Order No. 14 stated as follows:

The Buffalo River's watershed is located in a karst region. Karst geology is comprised of an abundance of limestone. Limestone is typically porous rock that can form pathways resulting in rapid discharges into nearby ground and surface water resources.

The Buffalo River's watershed provides habitat for numerous species of trees, plants, birds, game, and aquatic life. It is estimated that more than seven-hundred and fifty-thousand (750,000) people visit the Buffalo River, and the Buffalo National River Park area, to fish , float, swim , hike, camp, and engage in other recreational activities.

Swine CAFOs and swine confined animal operations have a propensity to produce large amounts of manure and wastewater annually. The manure and wastewater from a swine CAFO and swine confined animal operations are typically land applied. Because General Permit ARG590000 does not distinguish between karst regions and other regions of the State, and because Commission Regulation No.5 and General Permit ARG590000 do not expressly limit swine CAFOs and swine confined animal operations from being established in the Buffalo River's watershed, the Commission finds that a proliferation of medium and large swine CAFOs and swine confined animal operations in the Buffalo River's watershed will pose an unnecessary risk to the public health, safety and welfare which requires a change in existing rules and an immediate moratorium on the

establishment of any new medium and large swine CAFOs and medium and large swine confined animal operations in the Buffalo River's watershed over the next one-hundred and eighty (180) days.

I would like to add that the existing facility in Mt. Judea will generate more untreated waste (feces) than a city of 30,000. Surface to groundwater nutrient run-off is certain. I appreciate the ban on future CAFOs but the existing facility is one too many for karst terrain.

Sincerely,
Dane Schumacher