



September 23, 2019

VIA EMAIL ONLY (comment@adeq.state.ar.us)

Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Dr.
North Little Rock, AR 72118

Re: Public Comment Rulemaking Dockets 19-002-R and 19-003-R

To Whom It May Concern:

Please accept this comment for inclusion in both of the Dockets stated above.

My primary concern with the revisions, as proposed, is how ADEQ will respond to a facility seeking to house swine in numbers at the limit for both weight classes. Specifically, the draft rule could be interpreted to allow a facility housing 749 swine weighing 55 pound or more and 2,999 swine weighing 55 pounds or less. This would comprise a major facility with more swine waste present than that which C & H produced.

I suggest a rule adopting a simple conversion of counting every four animals which are less than 55 pounds as one which is over 55 pounds ($3000/750=4$). Thus, if a facility proposes a mixed weight-class operation, it will be clear what the maximum permitted number in each weight class is. For example, a facility proposing to keep 100 swine over 55 pounds could also house 2,600 swine under 55 pounds, but no more.

Thank you for considering and accepting this comment.

Sincerely,

/s Ross Noland

Ross Noland