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ARKANSAS POLLUTION CONTROL & ECOLOGY
COMMISSION'S PROPOSED CHANGES TO REGULATION 5
AND REGULATION 6

reg-comment@adeq.state.ar.us Dockets # 19-002-R and
19-003-R

I am always grateful for the opportunity to comment. Especially, I wish to thank Governor Hutchinson for his insight and thoughtful decision to close the controversial C & H Hog Farm, to thank DEQ Director Becky Keogh's action to make the moratorium permanent and the PC & E Commission for their unanimous vote in support of a permanent moratorium on issuing permits for large and medium swine CAFOs, in the Buffalo National River Watershed and its tributaries. What a splendid effort to protect our first national river!

I wholeheartedly support the proposed changes to Regulations 5 and 6. Having read and reread the regulations, the permanent moratorium will help assure preservation of our beloved Buffalo River and its water quality for future generations.

Quoting from the top three benefits of the proposed rule changes:

1. Protection of cultural, historical and recreational significance of the Buffalo National River.
2. Preserve water quality in the Buffalo and its watershed tributaries.

3. General protection of human health and the environment.

While those reading/responding to public comments are aware of all the reasons to support the permanent moratorium, I want to mention two critical reasons:

First -The proposed changes on siting of a CAFO states that applicants for CAFOs must comply with recommendations of the Agricultural Waste Management Field Handbook and the Field Office Technical Guide when planning waste storage ponds. This is critical on thin soils where karst topography, with its porous limestone, fractures, caves and sinkholes are common, as they are in the Buffalo River Watershed. There is significant risk of swine waste leaking into groundwater, our springs and other water bodies.

Second - While Rule 6 deals with National Pollution Discharge Elimination Systems (NPDES), I support the proposed ban or moratorium on hog waste “land application only permits” in the Buffalo River Watershed. Over application of swine waste, beyond agronomic need, accumulates so that during heavy rain events, it runs off fields into creeks and rivers causing nutrient pollution, low dissolved oxygen threatening aquatic biota, high levels of E. coli and algal blooms.

I applaud and fully support the thoughtful and well-written proposed changes to Rules 5 and 6.

By reference, I also wish to incorporate all comments made that support a permanent moratorium on large and medium CAFOs in the Buffalo River Watershed.

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