

Mr. Doug Szenher
Arkansas Department of Environmental Quality
Public Outreach and Assistance Division
5301 Northshore Drive North Little Rock, AR 72118

Dear Mr. Szenher:

RE: Docket #14-004-R

I agree with the proposed changes to Regulation 6 although I remain concerned that the number of swine under and over 55 pounds is still excessive posing unacceptable human health risks and risks to the waters of Arkansas when CAFOs are located on geological formations known as karst. I also remain concerned about the land application of waste water over land which is underlain by karst or where application of the wastewater will be relatively close to Arkansas extraordinary resource waters. I believe that over time contamination of the ground and other waters will occur as has occurred in both Iowa and North Carolina.

In addition to the already proposed changes, I also recommend that the following additional changes be considered to other sections of Regulation 6.202 to further strengthen the Regulation in regard to CAFO permits:

- 6.202 (A) Last sentence: The application must be submitted, approved, along with the approval letter from Arkansas Department of Health for ~~domestic~~ all discharges and a permit issued and effective before the activity applied for can begin.
- 6.202 (B)(3): Wastewater Treatment Ponds (Lagoons). Under Basis of Design, add a paragraph that requires all waste lagoons to have an HDPE liner over the current clay liner base.

This will assure there is no leaking of these containment ponds into groundwater.

- 6.202 (B)5: Appendix –Ground disposal of Wastewaters:

Add the following paragraph: Land treatment of wastewater from CAFO operations require the Arkansas Department of Health review of proposed application sites and signoff for CAFO wastewater surface discharges.

- 6.202 (D): Prior to obtaining a construction permit for ~~domestic~~ all wastewater discharges from ADEQ, an approval letter from Arkansas Department of Health is required.
- Add paragraph 6.202 (E): Prior to obtaining a construction permit for wastewater discharges from ADEQ, the Arkansas Geological Department shall review proposed surface discharge sites with respect to the surface and underlying geological structure and approve each application site as appropriate for disposal of CAFO wastewater.

I completely agree with the suggested by Mr. Gene Dunaway and supported by others indicated in many of the comments posted on the ADEQ database which would add language to require:

- Two notifications to the public in a paper of general circulation in the County where the facility is to be located;
- E-mail notice to those who join an ADEQ established list server to request such notices.

I also suggest that included in General Permits for these CAFO's that ADEQ be required to grant a public hearing prior to the issuance of a CAFO if so requested by at least 5 persons or organizations.

I thank you for the opportunity to comment on the proposed changes to Regulation 6.

Gerald Weber
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