

Robinson, Kelly

From: Lin Wellford <linwellford@gmail.com>
Sent: Wednesday, October 19, 2016 11:06 AM
To: Reg-Comment
Subject: Reg. 6 comments

To ADEQ:

Having been present at the APC&E meeting when Director Keogh announced her plans to stop using the Reg. 6 general permit, I was in a position to hear Judge Moulton sharply question her about the decision and remind the board that the previous director had come before them 4 years earlier to say that there was a need for the new type of reg. 6 general permit to stay in compliance with EPA regulatory changes. Director Keogh then revealed that EPA had not made the expected change after all so the Reg. 6 permit was no longer needed.

Since the permit was used only once, soon after it was approved by the APC&E board, one can't help but assuming that the permit change was part of a carefully orchestrated effort to work with industry insiders who needed a quick and quiet way of getting a 6500 head hog CAFO they knew to be controversial in place without letting the public know about it.

My comment is that Draft Section 6.207 should be deleted or modified to be consistent with the commitment made by the Director stating that ARG590000 would not be renewed after it expires on October 31, 2016. Don't allow it to come and go at the discretion of the director.

Now that C&H has been in place for long enough to see the impacts it is and will be having on the Buffalo River, ADEQ requests to change their permit to a reg 5 permit that would be virtually impossible to remove regardless of what damage it may do to a national river that is a shared resource. This is a chilling example of how corporate power seems to be at the helm of an agency that was created specifically to protect the waters of the state from being misused for private profit.

Judging by the revolving door whereby ADEQ employees appear to be rewarded for their complicity with special interests by being offered jobs working for them, it becomes clearer all the time that ADEQ is failing the state and the tax-payers who trusted it to protect our resources both now and for future Arkansans.

I no longer have any confidence that my remarks will make any real difference. But perhaps it will cause some of you to pause and consider your motives and actions, because the people of the state are watching now.

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