

Comments

Draft - Concentrated Animal Feeding Operation General Permit

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- 1 It is unclear, in S3.A, what is meant by "established waste load allocation for CAFOs."
- 2 In S3.A, how are "discharges not consistent with an approved TMDL" determined?
No explanation of whether or not discharges into groundwater from the production area are allowed by the permit was found. What was found in S4.B is that "the Permittee must prevent
- 3 discharges to surface water from its production area except in accordance with special condition S3.C."
- 4 Regarding S4.A.1, 40 CFR 122.42e, there are six subsections. As currently specified, 40 CFR 122.42e (1) refers only to the first of these six sections.
In S4.C, the need to design, operate, and maintain production facilities that will capture, channel, and properly store all contaminated water for later proper utilization or disposal is clear except for: 1) how long may standing contaminated water remain prior to being forced into qualified
- 5 waste storage facilities (it is common to observe local ponding of manure water in multiple locations within a production area), and 2) will corral muck areas (where saturated manure+soil persists) be considered sources of manure water that needs to be drained and transferred into waste storage facilities?