From:	Lendrum, Jacqueline M (DEC)
To:	Arcaya, Alyssa; Dorman, Sara H (DEC)
Cc:	Saporita, Chris; Coats, Andrea; Arvizu, Christy
Subject:	RE: citation clarifications- draft CAFO general permit
Date:	Monday, July 13, 2015 1:58:25 PM

Thanks Alyssa.

From: Arcaya, Alyssa [mailto:arcaya.alyssa@epa.gov]
Sent: Monday, July 13, 2015 1:53 PM
To: Lendrum, Jacqueline M (DEC); Dorman, Sara H (DEC)
Cc: Saporita, Chris; Coats, Andrea; Arvizu, Christy
Subject: citation clarifications- draft CAFO general permit

Hello Sara and Jackie,

Thanks again for meeting with us in New Paltz last week to discuss the draft CAFO general permit. As promised, we're following up with a few clarifications on citations.

- The citation for the transfer requirements for large CAFOs is 40 CFR 122.42 (e) (3).
- The citation for change in ownership requirements is 40 CFR 122.61 (b)(1).
- Part IV.G of the draft permit did not have a requirement stating that deficiencies not corrected within 30 days must be accompanied by an explanation of the factors preventing an immediate correction. This requirement can be found at 40 CFR 412.37(b)(3).
- Regarding land application requirements, Part IV.G of the permit is not consistent with requirements at 40 CFR 412.37(c). (We may comment further on land application during the public comment period, but wanted to raise this issue now.)

We look forward to seeing the revised draft when it is public noticed this summer!

Regards,
Alyssa

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Alyssa Arcaya
Acting Chief, NPDES Section
Clean Water Division, EPA Region 2
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