



State of Tennessee  
**DEPARTMENT OF ENVIRONMENT AND CONSERVATION**  
**DIVISION OF WATER RESOURCES**

William R. Snodgrass - Tennessee Tower  
312 Rosa L. Parks Avenue, 11th Floor  
Nashville, Tennessee 37243-1102

Mr. Dave Juenger  
Corporate Director of Support Services  
Cobb-Vantress Pedigree Farm  
e-copy: dave.juenger@cobb-vantress.com  
4703 US Highway 412 East  
Siloam Springs, AR 72761

Subject: **Permit No. SOPC00170**  
**Dry Creek Pedigree Farm**  
**Deer Lodge, Morgan County, Tennessee**

Dear Mr. Juenger:

You are receiving this letter because your animal feeding operation is currently covered under a CAFO General State Operating Permit. As a result of the passage of Public Chapter No. 523 (see attachment), which has an effective date of July 1, 2018, you are no longer required to maintain permit coverage. This is either due to your operation producing and managing a dry manure product only, or because your operation does not exceed the minimum animal number size threshold.

Public Chapter No. 523 also establishes a framework by which animal feeding operations that are not required to maintain permit coverage may apply for and, if eligible, be issued a permit. Animal feeding operations electing to obtain permit coverage are required to conduct such operations in accordance with their permit. If you elect to continue coverage under a state operating permit, or establish coverage under a National Pollutant Discharge Elimination System (NPDES) permit, please respond in writing to this letter at your earliest convenience. Otherwise, your current permit coverage will be administratively terminated.

Please be mindful that while Public Chapter No. 523 effectively reduces the population of animal feeding operations required to maintain permit coverage, it does not exempt any operation from its responsibility to prevent pollutants from entering waters of the state.

If you have any questions or would like to discuss this, please contact me at (615) 532-7743 or by E-mail at [John.Newberry@tn.gov](mailto:John.Newberry@tn.gov).

Sincerely,

John Newberry  
Land-Based Systems Section

cc: Permit File  
Knoxville Environmental Field Office  
Mr. Craig Benich, Farm Manager, Cobb-Vantress Pedigree Farm, craig.benich@cobb-vantress.com