

LORD'S ENVIRONMENTAL CONSULTING

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April 11, 2016

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: E.C. Farms - Public Hearing; Land Application of Waste

To Whom it May Concern;

I present the following in response to a permit application that would allow hog waste to be applied to open pasture land from the Concentrated Animal Feeding Operation (CAFO), the C&H Hog Farm. These fields are within the watershed of the Little Buffalo River and Shop Creek, a tributary of the Little Buffalo River, which is a tributary to the Buffalo National River. As a landowner in the Little Buffalo River watershed, this permit application is disturbing.

To me, the need for additional acreage to dispose of hog waste indicates a problem with the initial assessment of the lands ability to absorb the waste. Now, the permitted facility needs to obtain additional acreage to handle the toxic waste that equals the volume generated by the city of Harrison.

The ADEQ regulations no longer allow human waste to be land applied, so why is it allowed to distribute hog waste throughout Newton County and jeopardize our water resources?

What happened to the fields included in the original application? Were they not adequate? Are indicators of contamination starting to show up in the water sampling? Have they already reached their maximum loading capacity?

Dilution is not the solution to pollution! Water that was once potable should be returned to that condition by the company who generates it. It should not be spread around our county.

If it is the focus of the Arkansas Department of Environmental Quality to protest and preserve the air, water, and land resources of The Natural State, they why is this being allowed?

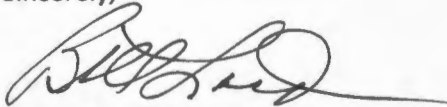
I do not question C&H Farms compliance with the ADEQ regulations. They act as they are required to by ADEQ. The root of the problem is that the regulations are inadequate to protect our water resources.

I also suggest a moratorium on any permits that allow hog waste from CAFO's to be spread on karst topographical regions such as Newton County. Facilities in this type of geological formation should be required to deliver the waste to an approved waste water treatment facility where it can be treated to meet the National Drinking Water standards. In the absence of an available public facility, the permitted facility should be required to construct and maintain an on-site water treatment plant that can meet the National Drinking Water Standards. These disposal methods are required for other facilities that generate toxic water. Even our local transfer station must collect its toxic water (leachate) and transport it to an approved waste water treatment facility.

It is important for us all to remember, we can live without pork (though life would be much less pleasant without bacon), but we cannot survive without clean water to drink.

Please let me know if you have any questions or want additional information about what I have said.

Sincerely;

A handwritten signature in black ink, appearing to read 'Bill Lord', with a long, sweeping horizontal line extending to the right.

Bill Lord, President
Lord's Environmental Consulting

CC: Files