RE: PUBLIC NOTICE OF DRAFT MODIFICATION NO-DISCHARGE PERMIT PERMIT NUMBER 3540-WR-7 AFIN 51-00020

RE: The permit is being modified to convert from storage and land application of swine waste from EC Farms to only land application of swine waste from C&H Hog Farms, Inc. in accordance with APC&EC Reg. 5.601.

To whom it may concern:

I appreciate ADEQ efforts for allowing this opportunity for public comment on EC Farms Reg 5 permit number 3540-WR-7 AFIN 51-0020 Modification. Allowing the permit modification to convert from storage and land apply on the EC farm to a land apply an all-natural organic fertilizer from C&H Hog Farm will benefit all local residents and all special interest groups. Adding the availably of EC Farms additional 597 acres of farm land to apply the all-natural organic swine fertilizer and along with the current permitted 607 acres will allow C&H Hog farm to move forward to dewater/draw down their current holding ponds. This will speed up the process to clean and inspect and install a new liner at the C&H farm. This is part of an good faith effort from C&H Farms to go above and beyond what the reqs require by volunteering to installing and pay for an additional synthetic liner in addition to the already over-designed 18" of impacted clay liner that is currently in their holding ponds. The additional 597 acres will help to provide a faster time line for C&H to complete this liner install task as well as adding additional acres to receive and benefit from additional grass hay and pasture production for cattle and the rogue elk and deer. Also the added benefits of most of EC Farms acreages is farther away from the Buffalo by more than 20 miles.

I would also like to point out that EC Farm's 597 family farm has been under permitted swine nutrient management activity for more than 30 years for storage and land applying this valuable all natural swine plant nutrient while maintain an excellent compliance record with no violations. This is additional proof that good stewardship of these local family farmers along with Mother Nature will provide for both protecting the natural environment and providing valuable nutrients to help support modern farming practices. These additional acres have had recent soil tests and will be managed under a nutrient management plan that is following the current Arkansas Phosphorus Index.

I am in support of ADEQ to allow the modification of the EC Farms Reg 5 permit number 3540-WR-7 AFIN 51-0020 by allowing the permit modification to convert from storage and land apply on this farm to a land apply permit for the all-natural organic fertilizer from C&H Hog Farm. These local multi-generations family farmers are going above and beyond the require laws governing the storage and application of all natural plant fertilizer. It makes me very proud to have such good stewards of the land and their active role as good citizens of the state of Arkansas and leaders in their rural communities.

Respectfully Submitted,

Bob Shofner

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Centerton, AR

Public Comment on
Draft Modification NaDischarge Permit
Remit # 3540-WR-7
AFIN 51-0620
EC FARM