

From: [James D. Simpson](#)
To: [Water Draft Permit Comments](#)
Subject: C and H Farm
Date: Tuesday, March 15, 2016 6:51:39 AM

C&H Hog Farms is owned by two brothers and their cousin. Prior to establishing C&H Hog Farms, the two brothers owned C&C Hog Farm. C&C ceased operations and its manure holding ponds were capped, filled and seeded after C&H began operations. The C&C permit was kept active along with the land application fields associated with it. The two brothers have since transferred the C&C permit to another individual. They renamed it EC Farms.

EC Farms has submitted a permit modification request to ADEQ to convert this permit into a land application only permit, i.e. no manure is generated or stored on site, so that EC Farms land application fields can accept manure from C&H. Allowing these fields to accept manure from C&H will roughly double the land application area available to C&H. C&H's opponents will claim, falsely, that C&H is attempting to avoid the ongoing monitoring being performed by the Big Creek Research & Extension Team. There are two very legitimate reasons for this modification. First, C&H plans to install synthetic liners in their existing manure holding ponds as was requested by the environmental community. They will have a very short time window to accomplish this which will be dictated by weather conditions. Having the extra land application acreage will allow C&H to more rapidly dewater and clean their existing manure holding ponds in preparation for the new liner installation. Secondly, applying the same amount of manure over more acres results in even lower application rates than those already being used by C&H. This is more protective of water quality and the environment.

Permit modifications such as this in any other location would likely be considered a minor modification and would not require a public comment period or public hearing. That is to say . . . If this involved any other hog farm in Arkansas other than C&H this permit modification would not be an issue.

Please let common sense and science rule on this issue – not misguided emotions – and support this farm's needs.

Sincerely,

James Simpson