

From: [Margaret Lonadier](#)
To: [Water Draft Permit Comments](#)
Subject: Re: E C Farms Permit #3540-7
Date: Friday, April 08, 2016 9:20:18 AM

I oppose the ADEQ permit for the EC Farms to spread hog waste from either C&H Farms or any other factory farm. The land area planned for waste spreading is in very close proximity to our state Extraordinary Resource Waters. Why would ADEQ approve a permit to allow this waste to be applied to land in these ERW watersheds and jeopardize water quality for these streams??

ADEQ has assured the public as well as the state legislature that it fully intends to address Big Creek pollution. According to recent soils test, many of the C&H waste spreading fields are NOW showing "above optimum" level of phosphorus, which will certain continue to be a potential source contamination of the main fork of Big Creek for the foreseeable future EVEN IF THE SPREADING IS DISCONTINUED due to the fact that it takes a very long time for elevated soil phosphorus levels to lower.

This permit will allow the spreading of up to 6 million gallons of waste annually. This is more than twice the current annual waste production of C&H Farms which is designated as the sole source of waste accepted by EC Farms. Why does this permit have such a high amount of waste allowed to be spread?

Also, the permit and nutrient management plan allow year around spreading of the waste. This is NOT environmentally safe due to the fact that waste will be spread when pasture grasses are NOT actively growing therefore not increasing risk of runoff and decreased nutrient uptake from the forages.

And, who is monitoring whether the waste applicators are actually following the application setback distances from sensitive environmental areas (rock outcrops, sink holes, streams, etc.)? Under the draft permit Part II - Specific Conditions Item 16 & 17 these set back distances are given and item 18 states these areas must be flagged prior to land application. I know for a fact these permit requirements are not going to be followed. I've yet to see any fields where C&H is applying waste as having flagged out waste application setback areas.

Finally, the permit states that only fields with either low or medium

phosphorus levels will be permitted for waste application but the fields are not required to have soils test but once every 5 years. What happens when 5 years from now the phosphorus index is high? It will then be too late to protect our water resources.

I sincerely request that ADEQ to use good judgement based on scientific evidence in regard to their stated purpose of protecting Arkansas' most precious water resources and deny this permit.

Sincerely,
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