

To: Arkansas Department of Environmental Quality

From: Pat Pollack 810 S. Vancouver Ave. Russellville, AR 72801

Re: Permit 3540-WR-7

I request that ADEQ grant the above referenced permit to accept liquid animal waste from the C&H farm in Newton County.

The C&H farm began operations in April of 2013. The farm owners have continuously demonstrated their ability to comply with conditions in their CAFO permit and Nutrient Management Plan (NMP) as detailed below.

On December 30, 2015 ADEQ inspected the farm to assess public concern pertaining to flooding and overflows that could have occurred due to significant rain events during the Christmas holidays. According to the inspection report: "At the time of the investigation WSP #1 and WSP #2 were not overflowing nor did they appear to overflow at any time."

The United States Department of Agriculture Farm Service Agency and the Small Business Administration jointly prepared and released an Environmental Assessment of C&H farm in December 2015. The Environmental Assessment determined No Significant Impact from the farm's continued operation.

The Big Creek Research and Extension Team (BCRET) have released 10 quarterly progress reports. There have not been any findings of the farm adversely impacting the environment. Recently a member of the BCRET stated that the Phosphorous level in one land application field has been reduced. This further demonstrates the functionality of the NMP and Arkansas P-Index.

Region 6 EPA inspected the C&H hog farm on April 15-17, 2014. The farm had been in operation for one year at the time of the inspection. The inspection report stated there were no areas of concern and record keeping was well managed and available on-site.

Considering the summary above, the logical action is to grant the permit modification request.