

From: [Barry Haas](#)
To: [Water Draft Permit Comment](#)
Subject: DRAFT NO-DISCHARGE PERMIT NUMBER 5264-W, AFIN 51-00164 C & H Hog Farms, Inc.
Date: Monday, March 13, 2017 7:09:41 PM

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

Dear Ms. McWilliams,

I am writing in opposition to the C & H Hog Farms, Inc., Draft No-Discharge Permit No. 5264-W, AFIN 51-00164. I urge ADEQ to deny the permit application.

The original permit to operate was granted to C & H in almost total secrecy due to wholly inadequate public notice requirements for a permit of that type and scale. Since being made aware of the hog factory well beyond the 30 day appeal period, the public has done everything it could to ensure this factory hog farm was stripped of its ability to operate in this sensitive area near Big Creek which feeds into the Buffalo National River. Public notice was so inadequate re the original permit that even the superintendent of the Buffalo National River didn't know about either the permit application or its issuance until well after the fact, and too late to appeal during the allowable appeal period. that's unforgivable.

In addition, a federally backed loan was approved for C & H, again without properly notifying affected parties like the Buffalo National River superintendent. As part of that federal loan guarantee, an inadequate Environmental Assessment that violated federal law was done. Once again the Buffalo National River staff were unaware of the application for a federal guarantee of the loan, and were not given an opportunity to comment in opposition.

Having lived in Arkansas for 50 years since being stationed at Little Rock Air Force Base in the late 1960s, this is one of the two worst examples of failure on the part of ADEQ I have seen. The other was the issuance of air permits to four large scale medical waste incinerators in the early 1990's with the public kept in the dark until a year after the permits had been issued by ADEQ's air division, again well beyond the 30 day appeal period.

ADEQ's job is to ensure the public has an opportunity to both know about and participate in decision making regarding such critical facilities as C & H Hog Farms in such a sensitive area. Your agency failed miserably in that regard.

The C & H factory hog farm sits on karst terrain which is known to allow subsurface pollutants to migrate great distances in subsurface waters along unpredictable pathways. First the hog waste gets into Big Creek, and then into the Buffalo River. There is already evidence that water quality is worse in Big Creek downstream of the facility compared to upstream from the facility. There is also a risk of the C & H holding ponds breaching, and releasing a large quantity of hog waste in what would be a catastrophic event.

Another issue is evidence that some of the farm fields currently used for dispersal of C & H's hog waste are overly nutrient rich which will result in hog waste leaving those sites. Is C & H legally permitted to over apply nutrients to that land?

The issue is not whether or not farmers raise hogs. The issue is where they raise them, and in a manner that protects the environment from unacceptable pollution and risk. The Buffalo National River watershed is an unacceptable location for any factory hog farms. It's a very high risk location. The Buffalo National River generates tens of millions of dollars annually in tourism to the state's economy, and in a part of the state where that commerce is so desperately needed. Those tourism dollars provide jobs in rural counties where jobs are scarce. C & H Hog Farms is going to kill the goose that lays the golden eggs.

I urge ADEQ to deny Draft No-Discharge Permit No. 5264-W, AFIN 51-00164 requested by C & H Hog Farms, Inc.

Sincerely,
Barry Haas
804 Konrad Court
Little Rock, AR 72223
501-821-4097 (Home- 10:00 a.m. to 10:p.m. preferred)