

**From:** [Duane E. Curby, Jr.](#)  
**To:** [Water Draft Permit Comment](#)  
**Subject:** C & H Permit  
**Date:** Wednesday, March 29, 2017 11:46:26 AM

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Please deny the permit due to lack of compliance with the Agricultural Waste Management Field Handbook (AWMFH)

1. The failure to acknowledge the presence of karst and follow the subsequent requirements for a detailed geologic investigation (Chapter 7),
2. Application of waste in excess of agronomic need (Ch 2-3),
3. Failure to perform a “*substantive evaluation of the impact of sudden breach or accidental release from waste impoundments*” (Ch 2-14),
4. Failure to “*develop an emergency action plan which should be considered for waste impoundments where there is potential for significant impact from breach or accidental release*” (Ch 2-15)
5. Inability to comply with guidance regarding waste application on flood prone and sloping (8-15%) fields. Guidance recommends injection or incorporation which is impractical in this terrain, requiring those fields be removed from the NMP (601.0504(f) and (m))
6. Failure to account for proximity of a waste impoundment to sensitive groundwater areas or to investigate groundwater flow direction, especially the failure to identify the presence of an improperly abandoned hand dug well located less than 600 feet downgradient from the ponds. (651.0703 and 651.0702)

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