

From: [David Wimberly](#)
To: [Water Draft Permit Comment](#); robert.moery@governor.arkansas.gov
Subject: C&H Hog Farm Permit
Date: Wednesday, March 29, 2017 2:31:33 PM

I encourage you to deny the permit for this facility in order to preserve the national treasure that the Buffalo River is! Further, it is not in 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)

Thank you,

David Wimberly, Fayetteville AR

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Chuck Leavell