

From: [Duane Woltjen](#)
To: [Water Draft Permit Comment](#)
Subject: C&H Permit Application
Date: Tuesday, April 04, 2017 12:15:14 PM

I hereby amend my previous submission for this application to include the following:

I have read about the Arkansas Phosphorous Index, and how mitigation is required by it to prevent nutrients from entering surface waters and aquifers.

I have also consulted USGS and Soil Conservation Service documents disclosing that the facility and associated fields for disposal of sewage from the CAFO are absolutely on karst associated with the Boone Formation. This is established truth.

If ADEQ has learned anything over the past few years of C&H operation, despite ADEQ's refusal to acknowledge the fact in any way to date, the previous sentence is the undeniable truth. You may continue to ignore the truth as it was ignored in the original application by C&H for a permit, but your reticence begs for redress in court, criminal malfeasance investigation and redress, and it obviously imperils the most precious values of Buffalo National River and the associated tourism benefitting the comparatively very weak economy of Arkansas and this region of Arkansas in particular.

Please review and document the applicability of the API to karst. Explain in detail how you will prevent untreated sewage from entering surface streams and the groundwater as required by the API if you spread sewage on karst. Clearly state your review in your documentation of this permit.

I submit you cannot explain a workable means to accomplish this requirement of the API, short of not allowing dangerous sewage to continue to be disposed of in this manner.

I noted the C&H original application listed numerous best management practices (BMP) that could be applied to mitigate the odor permeating and the Mt. Judea region, or more securely preventing permeation of the ground under the sewage lagoons, etc., but NOT A SINGLE BMP WAS REQUIRED OF C&H! This travesty has blighted Mt. Judea, and that is certainly no secret you are not privy, too. ADEQ has, in concert with C&H, taken Mt. Judea back to the stigma of the Little Abner, Daisy May, and Moonbeam McSwine era. Mammy Yokum was perhaps amusing. This failure solely of ADEQ is stupid, tragic, and downright indecent, worthy of redress in a court of law—effectively theft by official negligence.

I am told this is the “last chance” to guide ADEQ to get it right. If C&H continues to dump sewage on the ground in the Buffalo River watershed, it will never be “right” and ADEQ will never become legitimate in the eyes of the people of Arkansas. The people of Arkansas will not rest until this travesty is made right.

Stop, think, end forever the dumping of sewage in the Buffalo watershed.

Duane W. Woltjen

821 Applebury Drive
Fayetteville, AR 72701