

From: [Fran Alexander](#)
To: [Water Draft Permit Comment](#)
Subject: Reg 5 for C&H Hog Farm public comment
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C&H HOG FARM PERMIT (REG 5) PUBLIC COMMENT

Fran Alexander

1946 Fox Hunter Rd.

Fayetteville, AR 72701

479-442-5307

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To: Arkansas Department of Environmental Quality

The methodology used in testing the hog waste ponds for leaching into underground water systems has never been fully explained in regards to the location of the drill site, nor has the reason for only one drilling location in an area known by geologists to be karst, nor has there even been a recognition by ADEQ of this underground structural characteristic. Many of us submitted questions and comments about this pond site test and have not received answers. Were these questions and comments not considered pertinent? A summary comment from ADEQ certainly did not address the methodology decisions made for that single drill hole test. I'm not even sure a summary I read had anything to do with the comments submitted.

Last year thick algae was photographed stretching for 11 miles down the Buffalo River, but the public has not been informed as to any test results explaining the nutrient loading that would have triggered the river to become green slime. We do not even know if testing was done up and down multiple places on the river to identify the source of the nutrient fueling of this algae. If this algae growth continues another season, Arkansas can kiss tourism on the river goodbye and the loss of that revenue to the region and the state will fall directly to ADEQ for not adequately monitoring and addressing this pollution problem immediately, which is its responsibility.

If nutrient loads are increasing in the tributaries and the Buffalo River from run-off from the fields where thousands of gallons of pig manure are being spread those nutrients are the responsibility of ADEQ. With soil so thin, uptake of fertilizer so minimal, and slopes so prone to run-off, the probability of manure reaching the water downhill is pretty much a sure thing. Is ADEQ denying this is happening?

If Reg 5 truly does not require inspections and soil tests but a couple of times a decade to monitor this hog farm, then Reg 5 is essentially a Free Pass card for an

indefinite period of time (permanent ?) of its operation. A facility that is generating more raw sewage than the city of Harrison's human population, and is allowed to spread this waste on the surface of fields, has become a blatant violation of human common sense. To expect there to be no serious consequences to the health of plants, animals, and humans and to turn a blind eye to this reality is inexcusable.

Please do NOT issue this Reg 5 for C & H Hog Farm and save us all a lot of grief, money, and more years of struggle and strife because the battle to save the Buffalo will not end until its safety is secure.

Fran Alexander