

From: [Fay Knox](#)
To: [Water Draft Permit Comment](#); [Keogh, Becky](#); robert.moery@governor.arkansas.gov
Subject: [BULK] C&H Hog Farm
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Attachments: [c&Hmarch17.doc](#)

Ms. Becky Keogh, Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
Little Rock, AR 72118-5317
Governor Asa Hutchinson
Email: robert.moery@governor.arkansas.gov

Dear Ms. Keogh and Governor Hutchinson

Thank you AEDQ for allowing the 20 day extension for comments about C&H Hog Farm. In reviewing the letters already submitted there are so many containing concerns that have been eloquently addressed that all I can do is second many thoughtful comments already presented.

The National Parks Conservation Association letter states that allowing the permit would violate the protections afforded to the Buffalo National River, a Tier 3 River. The nutrient management plan impacts land conservation practices in the watershed. Applying animal waste to fields over karst threatens the National River and regional groundwater. The size of C&H Farms operation calls into question the ability to mitigate damages to the national park ecosystem.

I am in agreement with the The Buffalo River Watershed Alliance preliminary remarks. The discharge permit is inappropriate. AEDQ has failed in not acknowledging the presence of karst, and there is a lack of compliance with the Arkansas Waste Management Field Handbook failure to take into account evidence that discharge is already occurring. The permit violates the current moratorium, increasing number of sows will increase in number of pigs and the amount of waste produced annually. The Nutrient Management Plan uses optimistic and unrealistic assumptions and if management deviates even slightly the impact will be significantly higher than indicated.

Dane Schumacher states granting a Regulation 5 No Discharge permit is not the remedy

for a point source large concentrated animal feeding operation that stores and land applies

untreated waste in amounts comparable to a city the size of Harrison. Either Reg 5 or 6 permit provides adequate safeguards to protect the Buffalo National River and Big Creek from the impacts of discharges from waste storage ponds and/or fields in karst terrain, of a large industrialized point source facility.

I look forward to ADEQ reply from the excellent questions Rebecca Corley asked:
DQ:

Is C&H Hog Farm located on karst?

Does the data show lowered dissolved oxygen levels in Big Creek and the BNR?

Are the application fields reaching maximum absorption of nutrients?

Is the nutrient management plan sustainable for year after year application of the hog waste?

Who will be responsible for clean-up during a major storm event?

Why does the number of swine/piglets on the new permit vary so much from the original permit?

Has C&H violated the Moratorium of no increase in swine numbers in the watershed?

I agree with Marti Olesen's comments concerning karst and the drilling done at C&H and repeat her closing words. "In order to avoid adhering to the stringent measures required for liquid waste disposal management in karst as described in the AWMFH, ADEQ has misled the public, the CAFO owners, JBS, Governor Hutchinson and our Arkansas state legislators. Honesty and integrity must guide ADEQ's present actions and require it to deny this Reg 5 permit based upon its site in the highly variable karst terrain of the Buffalo National River watershed.

Your decisions will either bring pride or disgrace to the natural state, deny the Reg 5 permit.

Respectfully Submitted

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