

**From:** [Frank Millett](#)  
**To:** [Water Draft Permit Comment](#)  
**Cc:** [robert.moery@governor.arkansas.gov](mailto:robert.moery@governor.arkansas.gov)  
**Subject:** Request for denial of C&H Hog Farm Permit  
**Date:** Thursday, April 06, 2017 10:48:19 AM

---

ADEQ:

I strongly urge you to deny the permit for the future operation of the C&H Hog Farm (CAFO) near Big Creek, West of Mt. Judea, in Newton County, Arkansas.

The C&H Hog Farm Concentrated Animal Feeding Operation ( CAFO) dumps millions of gallons of hog urine and feces each year into giant waste lagoons just a few miles from the Buffalo National River. That waste is then sprayed onto fields that are adjacent to Big Creek, a major tributary flowing into the Buffalo National River. That waste will result in the serious pollution of the Buffalo National River.

The Buffalo National River is the Crown Jewel of Arkansas, and draws visitors from across the nation and around the world. A new National Park Service report shows that there were 1,463,304 visitors to Buffalo National River in 2015, and they spent \$62,243,200 in communities near the park. That spending supported 969 jobs in the local area and had a cumulative benefit to the local economy of \$72,009,000. All of that enormous benefit to the people of Arkansas will be in jeopardy if the C&H Farm permit is not denied.

I personally have a strong attachment to the Buffalo National River. My family and I have been canoeing and hiking on the Buffalo National River every year since 1972, when it was designated the first National River in the USA. Our children and grandchildren have grown up canoeing and hiking on the Buffalo River.

I strongly urge you to deny the C&H Hog Farm permit due to lack of compliance with the Agricultural Waste Management Field Handbook (AWMFH).

The specific reasons for this denial are the following

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).

Sincerely, Frank

Frank Millett  
1675 W. Cleveland St.  
Fayetteville, AR 72701