

**From:** [Gerald Weber](#)  
**To:** [Water Draft Permit Comment](#)  
**Subject:** Comments on REG 5 Permit 5264-W  
**Date:** Tuesday, March 07, 2017 5:41:47 PM  
**Attachments:** [5264-W Permit Comments .doc](#)

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Here are my comments on the C&H permit since I am unable to attend the meeting in Jasper on Tuesday.

Gerald Weber

To: ADEQ

Attention: Katherine McWilliams  
Permits Branch, Office of Water Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

From:

Gerald Weber  
17221 Highway 9  
Mountain View, AR 72560

Regarding: Permit 5264-W, C&H Hog Farms Permit

I firmly believe that this Hog Farm should never have been permitted in the first place, however, now that it has been in existence for several years and a new permit has to be approved, I would like to express my belief that this permit should not be issued. Following are the reasons I feel this Hog Farm should not be allowed in this particular region.

First, this hog farm was established atop a known karst geographical region and it is scientifically established that this honeycomb type structure allows water, ground and surface to freely move through the structure eventually ending up in springs, streams, creeks and rivers. So, should the hog waste containment ponds leak, and even the previous permit allows substantial leakage, then this effluent will eventually contaminate the ground water and springs which carry the contaminants into Big Creek and thence into the Buffalo.

Second, Along with the anticipated contamination of the groundwater and springs from allowable pond leakage, allowing the liquid effluent which is at the top of the settling ponds to be broadcast sprayed on fields adjacent to, or in the near proximity of streams and surface drainage areas will inevitably allow contaminants to be carried into the nearby waterways during storm events. And, even with the controls on when and how much effluent can be sprayed on fields, we all know that storms that the unpredictability of storms and the intensity of them are part of Arkansas' weather. So I believe we will have storm events that will result in contaminants sprayed on fields to be carried in to the nearby waterways. And this means Big Creek, other minor creeks and the Buffalo will experience pollutants above those already an issue in these waterways.

Third, as I understand it this new permit does not expire as the previous permit did which could allow additional review and public input. This is another major flaw in the entire permitting process. For these CAFOs it is imperative that periodically these permits must come up for renewal and that the public deserves the right to participate in the review and reissue of the permit. This lack of openness is exactly why this whole hog farm and CAFO permitting became such a big issue. Some of the original issues identified by the public have never been addressed and should this permit go forward any future problems will surely be buried. If this permit is approved apparently the only thing which might get the attention of ADEQ is if a section of the Buffalo River had to be closed to swimming, fishing and God forbid even floating.

Fourth, the testing results from the single well which was drilled to supposedly assure that the ponds were not leaking was not the preferred number of wells the scientific community had recommended and although no significant contamination from the ponds was indicated, there was an area where the karst map indicated a major fracture of the substructure rock. So, it is clear from even this single well that should the ponds leak, the subsurface structure will allow the transport of any contaminants throughout the region and where it will end up in the nearby waterways.

Fifth, the water testing in Big Creek below the C&H hog farm clearly indicates increasing levels of nitrates. The argument is that at this point no one knows if this is due to the C&H hog farm or from upstream. I believe that any person with any scientific knowledge understands that when increases are shown which could lead to upsetting the biological norm that one begins a thorough investigation of where they came from. And, I understand that Big Creek has now been requested they AGFC and the NPS to be placed on the impaired stream list due to the low levels of dissolved oxygen, another indication of a serious problem which likely is the result of operations at C&H Farms.

Sixth, when this Farm was proposed, many jobs were touted as going to bring prosperity to the County and thereby raise the living standards for locals. What happened to these jobs? I believe only a few jobs were actually created so the jobs BS which seems to drive all of Arkansas politicians continues.

Lastly, I continue to be concerned about the containment ponds and their ability to survive a major storm. As the climate changes, we are seeing more frequent major storms and flooding throughout the Country. I suspect that the design criteria for these holding ponds is not going to be sufficient to contain a major rain event. And, should one of the ponds be breached, this would be an environmental disaster. Don't say it can't happen here, just look at what has happened across the Country this past year. The pond design criteria that still allows thousands of gallons of effluent to leak is under-designed because there should never be allowable leakage of sewer water! And I feel all the waste from such operation should be required to be hauled off and disposed of elsewhere – completely away from any Karst or other environmentally sensitive areas. Perhaps this waste should be required to be reprocessed into bagged fertilizer for application to large cotton or other non-human food production crops.

In conclusion, I continue to believe this CAFO hog farm should never have been permitted in the first place. It is in a completely inappropriate area and **the permit should be denied**. I have nothing against the owners of this operation and I applaud their initiative for wanting to develop a facility to meet the ever growing demands for pork, but again this is not the place to do this because the risks are simply too large and there are already environmental issues which are growing just from the few years this hog farm has been in operation.

Gerald Weber  
Concerned Citizen