

From: [rain](#)
To: [Water Draft Permit Comment](#)
Subject: [BULK] draft permit for C&H farm
Date: Wednesday, March 15, 2017 6:35:39 PM

To ADEQ

Re: Public comment on draft permit for C&H farm

(Please let me know when this email is received and placed in the public record as I'm uncertain if this is the correct address, thank you)

Considering the unique situation of the C&H farm in the watershed of a protected and prized National River, the ADEQ should help the farm find a publicly acceptable solution for its waste management before continuing the permitting process. In their application for a new permit the C&H farm is not changing their waste management methods, only intending to spread their manure on more acres of land. Public resistance is increasing and will continue to increase against the C&H farm. The State of Arkansas will be involved in expensive legal battles and divisive political battles over the ADEQ permit for years to come. Rather than continue to permit the C&H farm ADEQ should help C&H farm find a publicly acceptable form of waste management.

Has the ADEQ advised the C&H farm on innovative methods of waste management, specifically anaerobic digestion? The US EPA in 2015 published the statement, "anaerobic digestion on hog operations shows great promise". (<https://www.epa.gov/sites/production/files/2015/>)- The publication notes economic barriers to implementing biodigestion on hog farms and suggests possible solutions such as assistance with feasibility studies that ADEQ could provide. It also suggests creative solutions for financing such as third party build/own/operate models which might be provided by public or private sources to end the public conflict in this unique situation.

Less interesting solutions to the hog waste in the Buffalo River watershed are also available, such as trucking the waste to a different watershed.

C&H Hog Farm draft permit 5264 should be denied until a publicly acceptable form of waste management, possibly biodigestion, can be implemented on the farm for the benefit of C&H farm, the State of Arkansas and the general public.

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(I live in Newton Co. though this is a Madison Co. mailing address)