

From: canbike@aol.com
To: [Water Draft Permit Comment](#)
Subject: [BULK] C& H Hog factory permit
Date: Wednesday, March 29, 2017 11:31:45 AM

Please deny the permit due to lack of compliance with the Agricultural Waste Management Field Handbook (AWMFH)

I just spent the last week or so at Tyler Bend on the Buffalo River. After working to maintain the Buffalo River Trail we had an opportunity to Kayak with the Ozark Society on Saturday, March 25. Unfortunately the river was too high and we scrapped that plan. We did have time to visit many waterfalls, spend time (and money) in Jasper and visit several other campgrounds.

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)

Since the River was high or at Flood stage when we were at Carver Campground, I cannot believe that there was no "overflow of waste" from the Hog impoundments up stream.

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)

I sincerely pray and hope that this entire Hog factory goes away. It is crucial for the continued beauty and safety of the waters of The Buffalo River.

Thank you,

Jan McMahon
Holiday Island, Arkansas