Tuesday, March 14, 2017

Water-Draft-Permit-Comment@adeq.state.ar.us

RE: Reg. 5 Draft Permit #5264W - ADEQ Draft Decision to Approve C & H Hog Farms Application for a No-Discharge Permit

Dear ADEQ:

I am a member of Friends of the North Fork and White Rivers (Friends), a watershed protection organization focusing on the Middle Section of the White River. Friends is dedicated to the water quality of these rivers and the health of The Buffalo National River is a concern.

I agree with the Buffalo River Watershed Alliance in asserting that the C & H Hog Farm draft permit 5264W was improperly approved by ADEQ and should be denied.

Among numerous reasons I list these:

- **No-Discharge Permit is inappropriate**
- **Karst** – I am mystified as to the continued avoidance to acknowledge the role of karst that not only underlies the facility but most of the spreading fields as well.
- **Lack of Compliance with AWMFH** (Agricultural Waste Management Handbook) – Regulation 5.402 states requirements for designs and waste management plans shall be in accordance with this handbook and there are numerous examples of failure to comply.
- **Discharge Evidence is being ignored** – this permit should be denied due to the evidence of discharge into Big Creek and the associated Buffalo River
- **Violates the Current Moratorium**
- **Deficient Nutrient Management Plan.**

I appreciate the opportunity to comment.

Sincerely,

*Jane E. Darr*

Jane E. Darr
Board member and Past President
242 Wheatstone Place, Cotter, AR 72626

*Friends of the North Fork and White Rivers is an Arkansas 501(c)(3) non-profit organization devoted to creating an ongoing dialogue where individuals, groups, and government agencies can work together to conserve, restore and enhance these beautiful rivers.*
To ADEQ staff – attached are my formal comments as well as what I have included in the body of the email.
Thank you for the opportunity to comment.

Tuesday, March 14, 2017

Water-Draft-Permit-Comment@adeq.state.ar.us

RE:    Reg. 5 Draft Permit #5264W - ADEQ Draft Decision to Approve C & H Hog Farms Application for a No-Discharge Permit

Dear ADEQ:

I am a member of Friends of the North Fork and White Rivers (Friends), a watershed protection organization focusing on the Middle Section of the White River. Friends is dedicated to the water quality of these rivers and the health of The Buffalo National River is a concern.

I agree with the Buffalo River Watershed Alliance in asserting that the C & H Hog Farm draft permit 5264W was improperly approved by ADEQ and should be denied.

Among numerous reasons I list these:

- **No-Discharge Permit is inappropriate**
- **Karst** – I am mystified as to the continued avoidance to acknowledge the role of karst that not only underlies the facility but most of the spreading fields as well.
- **Lack of Compliance with AWMFH** (Agricultural Waste Management Handbook) – Regulation 5.402 states requirements for designs and waste management plans shall be in accordance with this handbook and there are numerous examples of failure to comply.
- **Discharge Evidence is being ignored** – this permit should be denied due to the evidence of discharge into Big Creek and the associated Buffalo River
- **Violates the Current Moratorium**
- **Deficient Nutrient Management Plan.**
I appreciate the opportunity to comment.

Sincerely,

Jane E. Darr
Board member and Past President
242 Wheatstone Place, Cotter, AR 72626