

Comment of Regulation 5 Permit Application by C&H Hog

The following questions and comments are predicated on certain indisputable facts:

1. The C&H hog facility is in a particularly sensitive area due to its location on a major tributary of Arkansas' famous Buffalo National River.
 2. C&H is built on karst, a situation that should have called for extra scrutiny before the first permit was granted even if the facility was not to be built near a national river.
 3. By its own admission the previous administration erred in granting the original operating permit.
 4. As affirmed by court decision, the loan guarantees were approved under inadequate and hastily filed documentation and investigation
 5. Data from multiple studies and monitoring stations point to impairment of Big Creek.
 6. Research from other states has shown harmful health outcomes for residents living close to hog waste spray fields.
 7. Governor Hutchinson's administration now has an opportunity to correct the error by his predecessor. To grant a permanent Regulation 5 permit will only compound the original error and provide questionable benefit to a few and harm the many.
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- A. Why were no ADEQ geologists involved in the C&H permitting process? Isn't this omission, in and of itself, a reason to deny a new and permanent permit?
 - B. This facility, or any similar such operation, threatens an Extraordinary Resource Water which is also situated in a community where some families rely on shallow wells for their needs, including for drinking. Shouldn't the health and property of the local people be considered over the needs of a foreign multinational corporation?
 - C. Retired professionals from the U.S. Forest Service, U.S. Fish and Wildlife Service and former employees of ADEQ have stated that the investigation into the site and the subsequent application for a permit was totally inadequate. These professionals have previously stated their concerns at public hearings and in written form. Why would ADEQ ignore these qualified people?
 - D. The spray fields, where raw untreated sewage is applied, not only has already built to above optimum levels and where the process also releases waste into the air. Since it is well documented that breathing these contaminants is especially harmful to young children, how can ADEQ allow the disposal of hog waste to close to a public school?
 - E. Now that it is clear that Big Creek is impaired, how can a new permit be granted when, at the very least, there are valid reasons to suspect that C&H may be contributing to the pollution problems? Does it really make sense to wait to the point of no return to prevent serious harm to the local residents, the environment, and the reputation of the State of Arkansas?
 - F. Given the thousands of dollars of taxpayer money spent to support and "study" the impacts of this one facility, wouldn't it be make more sense to

spend that money in ways that would help alleviate the systemic poverty in the local communities?

In summary this permit should be denied because of the high risks the continued operation of this facility pose to the environment, local community, and Arkansas' reputation as the Natural State.

Thank you

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From: [Jack Stewart](#)
To: [Water Draft Permit Comment](#)
Subject: Regulation 5 permit application by C&H Hog
Date: Thursday, April 06, 2017 3:55:21 PM
Attachments: [Comments on C&H hog facility permit application April 6, 2017.docx](#)
[ATT00002.txt](#)

Attached please consider the following comments on the C&H permit application.