

From: [Lin Wellford](#)
To: [Water Draft Permit Comment](#)
Subject: comments on the Reg. 5 Permit Application for C&H Hog Farms
Date: Friday, March 24, 2017 12:12:05 PM

Katherine McWilliams
5301 Northshore Drive,
North Little Rock, Arkansas 72118

Dear Ms McWilliams,

As someone who has followed the establishment of a hog CAFO in the Buffalo River watershed for almost 5 years, I have noted a number of troubling issues and trends.

As Judge Marshall Price ruled, the original Environmental Assessment for C&H was inadequate and cursory. He ruled that a 2nd assessment had to be conducted, but again, it was done by an out-of-state company I understand never even visited the area. Both EAs left out mention of the threat of land applied waste in an area of thin top soil and karst geology. In fact, neither one even addressed the fragile geology of the area.

Fractures and fissures make it inevitable that pollutants will find easy access and travel deep into the ground. USGS maps, as well as credible state hydro-geologists and also, the ERI images provided through the sub-contracted study done by OK State U. geologists, should have been enough to prove that the area around the facility and throughout the Mount Judea region is particularly unsuitable for the massive land application of waste. Ground water transmission can be as rapid as seen with surface waterways, but is difficult to track without dye testing, which has NEVER been conducted for this facility. Privately funded studies around the facility suggest underground transmission up to 13 miles from the source. C&H is only 6 miles from the Buffalo River, and perhaps even closer via subterranean conduits.

Added to that is the single-hole exploration of the suspicious looking cavity that was indicated in the ERI study. Harbor Environmental refused to answer questions about the results of their exploratory drilling, and most particularly, the fact that refilling the bore hole required substantially more cement than expected.

So, here are my questions:

1. What will it take to get an admission that C&H Hog Farms, Inc. was indeed inappropriately sited on karst in an ecologically sensitive area?
2. Since we were not given the chance to get an explanation from the company that drilled the single hole and then filled it up, can someone at ADEQ give a reasonable explanation of why a bore hole required so much more material to fill it up than scientific calculations had indicated? Is there any other explanation other than that there was an underground cavity that the bore hole intersected?
3. Since the very nature of impairment via nonpoint sources is incremental and difficult to track, shouldn't the clear trends being seen in testing be enough to cause ADEQ deep concern?
4. How much impairment will ADEQ consider acceptable? At what point will the

director be willing to recognize that damage is being done? Which will it take:

- A. A major fish-kill event?
- B. Persistent algae blooms? For how long? How many river miles of algae will be acceptable?
- C. Increasing accounts of water-born illness? Will someone have to die in order to have this danger recognized?

Lastly,

4. Can the director and agency heads of the water division of ADEQ really be unaware of the ongoing and rising pollution of 55% of all monitored waterways? Have you not seen EPA data that 40% of impairment is caused solely by nonpoint source pollution? Do we really have to let the hog waste build up in the watershed to the point that the river is drastically damaged for decades or can we learn what other states have already learned?

The kinds of facilities are not sustainable. Like other corporate activities, they are designed to maximize profits and minimize responsibility for the damage that they will walk away from when there is finally no more profit to be had. And then every Arkansas taxpayer will be called on to help clean up the mess.

As someone who has already spent a considerable amount of my own time and money trying to get this greed-based factory out of a place it should never have gone, the notion that I will have to pay to clean up the mess at the end is especially galling.

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