

**From:** [Stewart J & P](#)  
**To:** [Water Draft Permit Comment](#)  
**Subject:** Regulation 5 permit for C&H  
**Date:** Friday, March 10, 2017 9:10:42 PM

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Does ADEQ understand why these things matter?

Industrial agriculture producers are fond of saying they are helping to feed the world. But why does the world need our help? Let's see . . . China has polluted 20% of their agricultural land as a result of uncontrolled industrialization, over use of pesticides and fertilizers containing heavy metals, irrigating with polluted water, thus making food grown on those lands toxic to eat. People are starving in Ethiopia, because their grain crops are exported to feed meat producing animals. Malaysia, killed one million pigs to stop the spread of Nipah Virus after over 100 people died. MERSA and H1N1 viruses and acid resistant E. coli are linked to industrial agriculture. So . . . now will we pollute our land, and chance disease, to feed the world?

Here in the Natural State, next to the first national river, we have a 6500 hog operation perched on Karst topography, quietly planned by a multinational corporation and now controlled by a Brazilian company, on another continent. A Reg. 5 permit is requested.

- Neither of two Environmental Assessments mention that barns, sewage ponds, and spreading fields are on karst; porous limestone, easily dissolved by acid leachates, with caves and crevices forming conduits to wells, ground water, Big Creek, and Buffalo National River. Environmental Assessment is less stringent than an Environmental Impact study. Now, with irrefutable evidence of karst from the ERI imaging and recent drilling, it is obvious that an Environmental Impact Study should originally have been required, and is an imperative before a Regulation 5 permit can be issued.
- CAFOs are considered "point source" discharge facilities. Waste from the C&H clay-lined sewage lagoons is permitted and expected to leak up to 5000 gallons/acre/day. Measurement of nitrogen levels in Big Creek are higher downstream than above the facility, and lower levels of oxygen are evidenced downstream. A Regulation 5 permit does not allow point source discharge.
- Studies and evaluation of impact in case of accidental waste release have not been completed nor emergency action plans been developed as required in the Agriculture Waste Management Guidelines.
- Field application of sewage has been in excess of rates that plants/crops can use. Fields test above optimum levels for Phosphorus, thus leaving nutrients to enter ground water or to erode and wash to lower areas.
- The total number of pigs/year on the CAFO has increased, contrary to the permitted number, thus increasing waste produced.

All of the above are reasons the Regulation 5 permit should not be issued.

Everyone wants clean water, but can rivers, lakes, and ocean shores remain clean when polluted water is carried to them in streams and tributaries and underground? To continue to produce food to feed ourselves and others, our land must be protected. Regulations are meant to protect people from industry, not corporations from people. Making America greatly polluted will not make America great!

Please explain why ADEQ is considering permitting this facility in spite of the bulleted reasons presented above that are contrary to a Regulation 5 permit.

Thank you.  
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