Friday, June 03, 2016

Katherine McWilliams
ADEQ
5301 Northshore Drive
North little Rock, AR 72118-5317

Re: C&H Hog Farm
AFIN 51-00164: Permit No. 5264-W

Dear Ms. McWilliams,

Friends of the North Fork and White Rivers (Friends) is a non-profit watershed organization whose area of concern is the middle White River, which includes the Buffalo River and Big Creek.

Friends questions the determination of administrative completeness of the C&H Farms application under Regulation 5 for the following reasons:

1. There is scientific evidence of release of significant amounts of hog waste into the groundwater at the farm site. The determination of certainty about any release needs to be made before a technical review is made in case remediation is required.
2. Regulation 5.402 calls for the design and waste management plans of liquid animal waste to be in accordance with the Agricultural Waste Management Field Handbook, which requires a comprehensive geophysical investigation of the site, including application fields. The investigative methodology is described in order to make an adequate scientific assessment of the hydrogeologic conditions. There was no mention of this regulation in the application.

Friends requests that a public hearing concerning the administrative completeness of the C&H permit application.

Sincerely,

Sam D. Cooke
President, Friends of the North Fork and White Rivers

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.
Please see the attached comment. Let me know if you are unable to open. If so, call me at 870-307-8922. Thank you for your help.

Sam Cooke