



A R K A N S A S
Department of Environmental Quality

CERTIFIED MAIL: RETURN RECEIPT REQUESTED (9489 0090 0027 6060 6392 55)

September 21, 2018

Jason Henson, President
C & H Hog Farms, Inc
HC 72 Box 2
Vendor, AR 72683

Re: Administratively Incomplete Application
NPDES Permit Number AR0052931, AFIN 51-00164

Dear Mr. Henson:

The application for issuance of your NPDES permit was received by ADEQ on April 13, 2018, with additional information received April 17, 2018. In accordance with Department procedures, your application has been reviewed and determined to be administratively incomplete. Due to the volume of additional information required, the application is hereby returned to facilitate submission of a complete document. While not a complete list, the following deficiencies are noted:

1. ADEQ Form 1
 - a. Section A.13 – a listing of the activities conducted by the applicant should be provided.
 - b. Section F – Industrial Activity;
This facility is subject to 40 CFR Part 412 – Subpart D
2. EPA Form 2B
 - a. Item II.B.1 – estimate, in tons, the amount of solids land applied from the process wastewater storage lagoons each year (if solids are not removed each year, provide an annual average based on the frequency of the solids removal process).
 - b. Item II.D.1 and II.D.3 – the “holding ponds” in Item II.D.1 should be listed in Item II.D.3 as “storage lagoons.”
 - c. Item II.D.2 – the area contributing to the shallow pit, pull-plug containment should be provided (i.e. pig holding and processing areas).
3. Nutrient Management Plan (NMP) – Portions of the NMP are dated 2012. Please provide an up-to-date NMP that meets the requirements specified in 40 CFR Part 122.42(e) and 40 CFR Part 412.4.
4. Additional information is required to evaluate the requirements of 40 CFR Parts 122.23, 122.42(e), and 412.4:
 - a. Provide a hydrogeological site investigation report prepared and certified by a Professional Geologist registered in Arkansas that thoroughly characterizes all aspects of the property that may directly or indirectly affect the design,

- construction, operation and monitoring of the process wastewater lagoons and land application fields;
- b. A conceptual hydrogeologic model of the site, including field specific assessments of the land application sites, must be developed and provided. All characterization studies must be integrated into a comprehensive geologic model that accurately describes and explains the site hydrogeology, including, but not limited, to the potential for transport of nitrogen and phosphorus to waters of the State from the process wastewater lagoons and land application sites. The model must be of sufficient detail to be used as a predictive tool for potential contaminant migration and serve as a basis for corrective actions.
 - c. Geotechnical characterization of the subsurface conditions and materials (i.e. soils, epikarst, and karst) on the site must be clearly demonstrated, including all information required to base the design and operation of large load bearing structures and the design stability of major features including process wastewater lagoon berms and liners;
 - d. Consideration of the recommendations and requirements contained in the United States Department of Agriculture Natural Resource Conservation Service technical publications – Field Office Technical Guide, as amended, and Agricultural Waste Management Field Handbook (AWMFH), as amended – must be provided to consider appropriate design and operational procedures and best management practices required by 40 CFR 122.42(e). For example, the following items from the AWMFH are applicable:
 - i. Emergency Response Preparedness [AWMFH 651.0204(a)];
 - ii. Groundwater Assessment [AWMFH 651.0703(b)];
 - iii. Geologic Assessments [AWMFH 651.0704(b)(4); AWMFH 651, Table 10-4];
 - iv. Berm Integrity Assessment [AWMFH 651.0704(b)(4)];
 - v. Pond Construction Quality Assurance [AWMFH 651, Table 10-4 and Appendix 10 E];
 - vi. Assessment of High-Risk Areas of Land Application Sites [AWMFH 651.0504(a)-(n) and Table 5-3];
 - vii. Design and Construction Guidelines for Waste Impoundments Lined with Clay or Amendment-Treated Soil [AWMFH 651 Appendix 10D]
 - e. Provide all liquid animal waste handling system design drawings and specifications developed and certified by a Professional Engineer licensed in Arkansas;
 - f. Provide all “as-built” construction documents and construction certifications by a Professional Engineer licensed in Arkansas; and
 - g. Provide an Operations and Maintenance Manual certified by a Professional Engineer licensed in Arkansas that includes requirements for inspection procedures, documentation, and recordkeeping to ensure continued reliability of all wastewater containment features, conveyance structures, and processing equipment.

Following receipt of a revised application with the requested information, ADEQ will begin reviewing that revised application. The submission of the requested information above does not ensure the application will be deemed administratively complete. Additional information may be required upon review of the revised application.

Thank you for your cooperation in this matter. If there are any questions concerning this submittal, please contact Alex Kreps at (501) 682-0619 or by email at kreps@adeq.state.ar.us.

Sincerely,

A handwritten signature in cursive script that reads "Bryan Leamons". The signature is written in black ink and includes a long horizontal flourish extending to the right.

Bryan Leamons, P.E.
Senior Operations Manager
Office of Water Quality