

Teresa Marks, Director

Arkansas Department of Environmental Quality

5301 Northshore Drive

North Little Rock, AR 72118-5317

Reference:

C & H Hog Farms, Inc. Nutrient Management Plan Modification; ARG59001 AFIN51-00164 C & H Farm

Dear Director Marks,

I appreciate the opportunity to comment on C & H Hog Farm's request to modify the nutrient management plan (NMP), to utilize the "Vac-Tanker" method of applying hog waste to Fields 7, 8 and 9. Originally, hog waste was to be land applied by sprinkling or spraying the waste onto Fields 7 – 9. Part 3.1 of the General Permit states that the NMP must be developed in compliance with the Arkansas NRCS Conservation Practice Code 590 or Code 590AR. Code 590AR must be followed to protect air quality by reducing odors such as nitrogen, sulfur and/or fine particulate emissions to reduce the impact on human health and the environment. Code 590AR also states that the process of injection and tillage of waste into the soil should be used. Permit modification should be denied because there does not appear to be an odor and emission control plan.

I am opposed to land application of hog waste by Vac-Tanker or any other method, on Field 7 during the school year when children are present and opposed to land application of hog waste by Vac-Tanker to Fields 8 and 9 which are close to two residences - unless the buffer zones or setback requirements reconfirm that no actively occupied residences are within 500 feet or more of Fields 8 and 9.

Field 7 is one of the largest fields and the designated "emergency field", for waste application in the event the ponds are reaching capacity. Field 7 is West of Mt. Judea Schools . The prevailing southwest winds will carry the vented hog farm fumes of ammonia, hydrogen sulfide, methane and fine particulates toward the School and citizens of Mt. Judea. These fumes are well-documented public health threats (especially respiratory and neurological health) to young children and the elderly population.

The modification of the permit to allow hog waste application to Fields 7, 8 and 9 by Vac-Tanker should be denied because a revised NOI is part of that request. There are few differences between the revised NOI and the original NOI. There are well-known misrepresentations and misidentification of spray fields and their respective leases in the original and revised NOIs. When a request for permit modification includes a revised NOI to use the Vac-Tanker and ADEQ and the applicant both know of the inaccuracies

in the document but applicant submits the request anyway, I do not see how it is possible for ADEQ to grant C & H's application to modify this permit to utilize the Vac-Tanker .

In reality, had C & H followed the rules and had ADEQ insisted that C & H follow the rules, additional hearings could have been avoided. Now, the public can anticipate and expect more permit modification requests to come on this multi-flawed permit.

I oppose the permit modification for the above reasons.

Respectfully submitted,

Alice B. Andrews

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From: [alice andrews](#)
To: [Water Draft Permit Comments](#)
Subject: C & H Hog Farms, Inc., Nutrient Management Plan Modification; ARG59001 AFIN 51-00164 C & H Farm
Date: Monday, March 24, 2014 2:17:36 PM
Attachments: [Alice comments on the C & H request to modify permit March 24 2014.docx](#)

I have attached my comments. Please confirm receipt if there is a problem opening the attachment. I can send as an email if necessary.

Thank you,

Alice B. Andrews
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