

From: [Alan Nye](#)
To: [Water Draft Permit Comments](#)
Subject: Proposed modification of coverage for C&H Hog Farm
Date: Thursday, April 16, 2015 9:56:53 PM

Thank you for the opportunity to submit these comments.

The requested permit modification contains insufficient detail to determine whether the rate of waste application to fields 5-9 by tanker truck from pond #2 are equivalent to the rate applied by a sprinkler from pond #2. Depending on the timing of a rain event, the difference in rates of waste application or whether tanker truck spraying will achieve an even distribution of wastes on these fields. The differences between waste spraying from the tanker truck versus a sprinkler could affect the amount of surface waste and nutrient runoff from fields 5-9.

While I understand that only comments directly pertaining to the modification will be considered, it is unfortunate that the public is invited to comment on only a very narrow portion of the General Permit. The C & H documentation for the permit is replete with errors, miscalculations, and deviations in the nutrient management plan. For example, documents submitted by C & H to justify modifying the permit contain incorrect maps, specifically with regard to ownership of field 5 and parts of fields 12 and 16. There are no new maps in the revised nutrient management plan. These continuing map errors, inaccurate leases and land ownership errors are among some of the many things that must be corrected.

Because of such errors in the permit, the entire permit should be reopened to public comment.

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