



Arkansas Chapter

March 17, 2014

Teresa Marks, Director
Arkansas Department of Environmental Quality
Little Rock, Arkansas

RE: Public Comment on NPDES General Permit ARG590000 for Concentrated Animal Feeding Operations (CAFOs)
C & H Hog Farms NMP Major Modification Request - Land Application Method Revision

Dear Ms. Marks,

I am writing to you on behalf of the Arkansas Chapter of the American Fisheries Society. As a part of the world's oldest and largest nongovernmental organization devoted to the conservation of fishery resources, our main goal is to promote the wise management, conservation and use of the fishery and aquatic resources of Arkansas and the Nation.

The Chapter is respectfully requesting you to fully reopen the permit for C&H Hog Farm for public comments. C & H is the first industrial-scale hog facility to be located in the watershed of the Buffalo National River and the first facility in Arkansas to be granted coverage under the NPDES Concentrated Animal Feeding Operations ("CAFO") General Permit ARG590000.

As you are aware, significant concerns have already been raised with the adequacy of this permit. The initial permit was not carefully prepared and the applicants failed to secure permission to dispose of swine waste from a landowner identified in the proposed Nutrient Management Plan. Letters from the landowners to the University of Arkansas Big Creek Research Team make it clear that C & H misrepresented the agreement between them and the landowners. This was not an oversight but a blatant commission of fraud because the landowners were specifically contacted by C & H to contract for swine waste disposal on their land and these landowners categorically denied permission. Further, maps prepared in support of the Waste Management Plan do not correctly identify the land application areas and C & H does not have permission to access the identified lands. There are other problems but just these few egregious errors in the permit application make it clear that the entire permit application is suspect and should be fully reopened to allow careful and complete scrutiny with public comment.

Thank you for your consideration of our comments as the AR Department of Environmental Quality considers how to address this very severe problem.

Sincerely,

Richard S. Grippo

Richard S. Grippo, Ph.D.
Chair, Environmental Affairs Sub-Committee
Arkansas Chapter of the American Fisheries Society

From: [RICHARD S. GRIPPO](#)
To: [Water Draft Permit Comments](#)
Subject: Public comment of the C & H CAFO operation permit
Date: Wednesday, March 19, 2014 4:56:22 PM
Attachments: [Hog Farm application reopening request 2014.docx](#)

Dear AR DEQ,

Please find attached public comment on the above mentioned CAFO permit.

Sincerely,

--Rich Grippo



Please consider the environment before printing this email.

Richard S. Grippo, Ph.D.
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