

From: [Chuck Bitting](#)
To: [Water Draft Permit Comments](#)
Subject: Comment on C&H Modification Request : ARG590001 AFIN 51-00164
Date: Friday, August 07, 2015 12:28:07 PM

Dear Director Keogh:

This letter is in reference to the permit modification proposed by C&H Hog Farm, Inc. (ARG590001).

I am opposed to granting the modification at this time for several reasons.

1. Has ADEQ completed an Antidegradation Review as required under 40 CFR for the Buffalo River, a Tier 3 stream. If not, it occurs to me the entire permit, including this modification is invalid.
2. The engineering report and drawings for lining the ponds has no information about the final disposition of the sludge, clay, and other material that will be removed from the ponds in order to line them. This information is necessary for the public, and ADEQ to make informed decisions regarding this modification.
3. There does not appear to be any discussion of using a bond to ensure that if pollution of the Waters of the State occurs as part of this operation that cleanup will be payed for. This needs to be considered an important part of the overall operation.
4. The flare appears to be a stationary emission source, much like a generator at a factory. Is an air permit required, as would be required by a factory installing a backup generator?
5. There does not appear to be any leak detection technology built into the upgrades to this "State of the Art" facility. Surely, in this area of karst geology, a leak detection system is worth requiring.
6. Will engineers with ADEQ be on site daily to inspect the work being done? This seems like a reasonable measure, to ensure ADEQ is doing its utmost to protect the water quality of the Buffalo River for all Arkansans, and all Americans, particularly since a huge portion of your budget comes from the US Government, and the Buffalo River is a national resource.
7. Re-lining an existing waste storage pond is risky as it will disturb whatever seal, if any, the sludge and clay has developed, and may cause additional adverse impacts to ground water quality in the area, which will be reflected in surface water quality problems.

As a citizen of Arkansas, and a private farm owner, I would appreciate ADEQ taking its job more seriously to protect the water and air quality of our state FOR THE PEOPLE, rather than pandering to politicians and corporations whose primary aim is to show a profit. Some things are worth more than money.

Sincerely,

Charles J. Bitting

Marble Falls, Arkansas