



1308 West 2nd Street Little Rock, AR 72201

(501) 301-8280

March 24th, 2014

Ms. Teresa Marks, Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317
Email: Marks@adeq.state.ar.us

RE: C&H Hog Farms, Inc., NPDES Permit Number ARG590001

Director Marks:

As a Friend or Member of the Arkansas Sierra Club, please accept these comments on the above-referenced matter.

I am strongly opposed to the construction and operation of the C&H Hog Farms facility in the Buffalo River watershed area. Operation of a concentrated animal feeding operation in one of our nation's most important watersheds is unthinkable. The issues of public notice and the use of a general permit have been raised and discussed thoroughly by others so Sierra Club will not rehash those points. Suffice it to say that a project of this magnitude in an area of such importance as the Buffalo River watershed should have been thoroughly discussed and hashed out publicly. As you have seen since the facility was permitted, the public is keenly interested in and opposed to such a facility in this area.

However, if the facility is to be permitted, it should be held to the most rigorous and thorough environmental standards possible. The consequences of leaks and discharges of swine waste from this CAFO would be catastrophic and disrupt an area that is truly a national and state treasure.

With regard to the proposed nutrient management plan, I wish to raise the issue of proximity of the facility to the Mt. Judea community. Field 7 of the facility is located within 250 feet of the Mt. Judea school grounds and is within 1100 feet of the school buildings themselves, in addition to being within a few hundred feet of at least two residences. I am deeply concerned that the resulting exposure of school children and elderly Arkansans to swine waste is particularly dangerous.

ADEQ should require that a comprehensive air quality monitoring station be installed at the Mt. Judea School. This station should monitor for ammonia, hydrogen sulfide, airborne particulates and other components of swine waste known to be hazardous to human health. Results of air monitoring would be made regularly available to the public. The close proximity of the Mt Judea school to field 7, the school principal should be notified in advance of any field applications so that appropriate measures can be taken to minimize exposure of students and staff.

Field 7 should be included as part of the Big Creek Research Study. The research team has identified it as a high use and representative field and initially it was included on their list of preferred study fields. Pursuant to the Memorandum of Agreement, ADEQ has the responsibility to "Assist the University with obtaining access to conduct the study..." Therefore ADEQ should facilitate the inclusion of field 7 in the Big Creek study. Studies should include pre-application dye-testing, ground-penetrating-radar study, groundwater monitoring, and surface water testing in adjacent Big Creek.

Again, I wish to express its strong opposition to the project. The dangers to the Buffalo River watershed area—both environmentally and in terms of future tourism--are far too high to justify any benefits from a swine farm. We further request that ADEQ, if this facility is to be allowed to continue operating, hold the facility to the very highest and strictest environmental standards possible.

Sincerely,

Clay McCastlain

From: [Bailey, John](#)
To: [Vickerson, Casey](#); [Deardoff, Amy](#)
Subject: FW: Buffalo River hog farm
Date: Tuesday, March 25, 2014 1:43:03 PM
Attachments: [Buffalo River letter to ADEQ 3-22-14.docx](#)
[ATT00001..htm](#)

From: Marks, Teresa
Sent: Sunday, March 23, 2014 7:45 AM
To: Bailey, John
Subject: Fwd: Buffalo River hog farm

Begin forwarded message:

From: Clay McCastlain <jclaymccastlain@gmail.com>
Date: March 22, 2014, 7:33:25 PM CDT
To: "Marks, Teresa" <MARKS@adeq.state.ar.us>
Subject: Buffalo River hog farm

Please see attached letter. It gives my opinion on this matter very well.

Sincerely,

Clay McCastlain