

From: [Duane Woltjen](#)  
To: [Water Draft Permit Comments](#)  
Subject: C&H Hog Farm General Permit ARG590000  
Date: Friday, April 17, 2015 1:47:12 PM

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Dear APC&EC Members and ADEQ Staff:

C&H must be denied a modification to their permit, and their current permit must be rescinded immediately to save the public from impending great harm already quite recognizable and scientifically detectable.

Recently C&H reported their effluent for 2014 was as 2.3 to 2.6 million gallons (what is the truth?), which they purportedly spread on just three nearby hay fields. Accepting that these numbers bracket the actual amount discharged, and that they actually discharged the effluent where they say they did (very, very unlikely), these fields are surely now super saturated with phosphorous, so what C&H really needs is a highway tanker to transport effluent to a large metro area sewage treatment plant, not a little vac truck to suck it up and spew more on the soaked hay fields.

ADEQ must realize plants take up some of the applied phosphorous, but the remainder is divided between phosphorous bound to the soil and phosphorous entering the water table. So what? So the bound phosphorous enters streams (Big Creek and the Buffalo River and White River and Mississippi and ocean waters) as eroded soil (a geophysical process that can be slowed but not stopped). Here it joins water soluble phosphorous from runoff, dissolved phosphorous, and interstitially lodged phosphorous discharged with groundwater entering the surface streams to nurture copious algae—which grows, dies, and decays as it saps dissolved oxygen to the extent benthic organisms and even aquatic vertebral species are affected, often killed. Surely you realize the above, so why have you failed to act in light of this knowledge?

Consider the persistence of phosphorous contamination of the Illinois River. Here it is proven by elimination of sewage sources that the remaining principal source of excessive phosphorous is phosphorous bound to eroding soil and polluted groundwater discharging into the Illinois.

ADEQ should be addressing the fundamental validity of phosphorous index based NMPs. THE PHOSPHOROUS INDEX concept IS DEEPLY FLAWED. Deeply flawed because it does not account for residual applied phosphorous bound in the deeper soil layers or residing in the water table. Ignoring the phosphorous not taken up by plants is ASSURING A MAJOR LONG TERM CATASTROPHY IN THE MAKING IN ARKANSAS AS ATTESTED IN NORTH CAROLINA, IOWA, ILLINOIS, ETC., WHERE WELLS ARE POISONED, RIVERS ARE FETID, AND ESTUARIES ARE DEATH ZONES.

PLEASE QUESTION DR. SHARPLEY TO LEARN THE SAD TRUTH ABOUT THE PHOSPHOROUS INDEX FALICY—OR JUST THINK.

ARG590000, ISSUED BY ADEQ, IS PERMITTING INSIDIOUS CONTAMINATION TO DISCHARGE INTO THE BUFFALO RIVER. INCREDIBLE MALFEASANCE!

Please, rescind the permit; allow no modifications; get all the hog manure out of the Buffalo basin. Realize the truth about the farcical Phosphorous Index Based Nutrient Management Plan. Protect our resources from insidious contamination. Do not allow this to go on.

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