



March 3, 2015

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

**VIA FIRST CLASS MAIL
AND ELECTRONIC DELIVERY**

Ryan Benefield
Deputy Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317
Email: benefield@adeq.state.ar.us

Re: Modification Request for C&H Hog Farms, Inc. NPDES Permit No. ARG590001,
File AFIN 51-00164

Dear Director and Deputy Director:

This letter is in response to recent documents submitted by C&H Hog Farms, Inc. to your office including its Modification Request posted January 24, 2015, its Revised Nutrient Management Plan dated February 1, 2015, and its Revised Comprehensive Nutrient Management Plan, posted February 26, 2015.

All of these documents continue to contain incorrect maps specifically regarding ownership of field 5 and parts of fields 12 and 16. According to former Director Marks in a letter to Earthjustice dated February 20, 2014, C&H Hog Farms was to submit new, correct maps to ADEQ by March 30, 2014. We are not aware of any new maps and they are not included in the Revised NMP.

However, we do note that the Big Creek Research and Extension Team is using some unexplained field numbers, including a field 5a. This field is not part of the NMP and is reportedly not receiving any waste applications from C&H. This only further confuses the ongoing errors and misrepresentations regarding application field ownership and identification.

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Until these ongoing errors are corrected we ask that all requests by C&H for permit modifications be denied.

Sincerely,



Monica K. Reimer
Attorney

On behalf of:



Bob Allen
Arkansas Canoe Club



Jack Stewart
Buffalo River Watershed Alliance



Emily Jones
National Parks and Conservation Association



Robert Cross
Ozark Society

cc: John Bailey
Bailey@adeq.state.ar.us
Ms. Vickerson
vickerson@adeq.state.ar.us
Arkansas Department of Environmental Quality
5301 Northshore Drive
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Carl E. Wills
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Willie Lane
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US EPA, Region 6
1445 Ross Ave Suite 1200
Dallas, Texas 75202

From: [Solaimanian, Jamal](#)
To: [McWilliams, Katherine](#); [Richardson, Stefanie](#)
Subject: FW: Comments re: C&H Hog Farms, Inc.'s Modification Request; NPDES Permit No. ARG590001,File AFIN 51-00164
Date: Tuesday, March 03, 2015 3:21:53 PM
Attachments: [Letter to ADEQ March 3 2015 - NPDES Permit ARG5900001.pdf](#)
Importance: High

Please make sure it is processed and on the web. Thanks.

Jamal Solaimanian, Ph.D., P.E.

Engineering Supervisor

Water Division, ADEQ

501-682-0620

jamal@adeq.state.ar.us

From: Shafii, Mo
Sent: Tuesday, March 03, 2015 3:20 PM
To: Bailey, John; Solaimanian, Jamal
Subject: FW: Comments re: C&H Hog Farms, Inc.'s Modification Request; NPDES Permit No. ARG590001,File AFIN 51-00164
Importance: High

From: Benefield, Ryan
Sent: Tuesday, March 03, 2015 1:07 PM
To: Carpenter, Ellen; Shafii, Mo
Subject: FW: Comments re: C&H Hog Farms, Inc.'s Modification Request; NPDES Permit No. ARG590001,File AFIN 51-00164
Importance: High

From: Monica Reimer [<mailto:mreimer@earthjustice.org>]
Sent: Tuesday, March 03, 2015 1:02 PM
To: Keogh, Becky; Benefield, Ryan; Bailey, John; Vickerson, Casey
Cc: 'Wills.carl@Epa.gov'; 'Lane.willie@Epa.gov'
Subject: Comments re: C&H Hog Farms, Inc.'s Modification Request; NPDES Permit No. ARG590001,File AFIN 51-00164

Attached please find comments submitted by Earthjustice on behalf of Arkansas Canoe Club, National Parks and Conservation Association, Buffalo River Watershed Alliance, and the Ozark Society with regards to C&H Hog Farms, Inc.'s Modification Request with regards to NPDES Permit No. ARG5900001, File AFN 51-00164. We ask that the issues raised in these comments be considered during your deliberations on this modification request. These comments are also being delivered by

First Class U.S. Mail.

Sincerely,
Monica K. Reimer
Attorney

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