

From: [Gerald Garrison](#)
To: [Water Draft Permit Comments](#)
Subject: FW: Reference: C&H Hog Farms, Inc., Nutrient Management Plan Modification; ARG59001 AFIN 51-00164 C & H Farm
Date: Wednesday, March 19, 2014 7:22:43 PM

From: Gerald Garrison [mailto:gvg650@hotmail.com]
Sent: Wednesday, March 19, 2014 7:18 PM
To: 'Comment@adeq.state.ar.us'
Subject: Reference: C&H Hog Farms, Inc., Nutrient Management Plan Modification; ARG59001 AFIN 51-00164 C & H Farm

I adamantly oppose ADEQ's decision to consider a modification of the C&H Hog Farms, Inc. CAFO permit without reopening the permit in its entirety for the following reasons:

1. It is common knowledge that this hog **CAFO permit was granted without any public comment** (presumably because of serious flaws in ADEQ's public notice process).
2. As a result of the failure in the public notice process, ADEQ permitted a CAFO that is allowed to spread over 2 million gallons of odoriferous wastewater a year on lands directly abutting a major tributary of the Buffalo National River. ADEQ granted the permit **without due consideration of the area's well-known karst geology** that has the serious potential for allowing rapid underground flow of polluted water into the Buffalo River. ADEQ now has in its possession the underground studies performed by the University of Arkansas. Those studies demonstrate the existence of underground features that would allow rapid underground flow in the floodplain of Big Creek where C&H wants to spread its waste. Modifying (extending) the permit to allow land application via vacuum tanker on Fields 7 - 9 would compound the error.
3. Chronic exposure to swine waste (ammonia, hydrogen sulfide, airborne particulates and other components of swine waste) are **known to be hazardous to human health** - particularly among children and the elderly. Field 7 is within 250 feet of the Mt Judea K-12 school grounds and within 1100 feet of the school buildings; Field 7 is within 300-400 feet of at least two residences and a cemetery and west of all of these occupied buildings - the direction from which the prevailing winds blow.

A requirement of the General Permit (ARG590000) is that the NMP be developed in accordance with the Arkansas NRCS Conservation Practice Standard Code 590 (Nutrient Management). Code 590 states that "To address air quality concerns caused by odor, nitrogen, sulfur and/or particulate emissions, the source, timing, amount, and placement of nutrients must be adjusted **to minimize the negative impact of these emissions on the environment and human health.**

- Again, modifying (extending) the permit to allow land application via vacuum tanker on Fields 7 - 9 compounds the error.

4. The C & H requested permit modification **does not include a comprehensive air quality monitoring** station installation at the Mt Judea school as a condition of its approval. The close proximity of Field 7 and the known public health hazard posed by swine waste to the Mt Judea school children and staff and the adjacent community make it mandatory that ADEQ require permanent, comprehensive air quality monitoring for ammonia, hydrogen sulfide, airborne particulates and any other components of swine waste known to be or potentially hazardous to human health. The air quality monitoring requirement must require prompt and continuous public notice and strict ADEQ oversight. If this process is allowed to proceed, the Mt Judea school principal should be notified in

advance of any and all field applications so that appropriate measures can be taken to minimize exposure of students and staff.

Once more, modifying (extending) the permit to allow land application via vacuum tanker on Fields 7 - 9 compounds the error.

5. The C & H request for permit modification included the submission of a revised NOI. With few exceptions, the revised NOI is identical to the original NOI. Both the original and **revised NOI contain information known to be inaccurate** including misidentification of the spray fields and misinformation in the spray field leases. Prior to the submission of the revised NOI, C & H owners were made aware of these inaccuracies (see Inspection Reports 1 and 2) yet they knowingly submitted a substantially unchanged, and still inaccurate, revised NOI.

Again, modifying (extending) the permit to allow land application via vacuum tanker on Fields 7 - 9 compounds the error.

ADEQ must take every opportunity to consider the effects to the public health and impacts on the local community. Allowing C&H operations to move forward without a thorough and complete review of the permit in its entirety is **counter to the spirit and intent of Arkansas statutes and the federal Clean Water Act**. The operations of this CAFO pose threats to the Buffalo River Watershed and to the health and livelihood of the people who live in the surrounding area.

Attachments:

Attachment 1: Inspection Report 1

<http://www.adeq.state.ar.us/ftproot/Pub/WebDatabases/InspectionsOnline/073447-INSP.pdf>

Attachment 2: Inspection Report 2

<http://www.adeq.state.ar.us/ftproot/Pub/WebDatabases/InspectionsOnline/075752-insp.pdf>

Attachment 3: Memorandum of Agreement

http://www.arktimes.com/media/pdf/moa_adeq_div_of_ag_-_buffalo_watershed_water_testing_9-5-13.pdf

I respectfully and urgently demand that ADEQ put aside the pressures of big corporate money and greed in favor of protecting Arkansas and its people.

Respectfully,

Gerald Garrison
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