

From: [Fuller, Kim](#)
To: [Deardoff, Amy](#)
Cc: [Bailey, John](#); [Yarberry, Katherine](#); [Vickerson, Casey](#)
Subject: FW: Questions/Comments_Web_Submission: _#1395694665328
Date: Monday, March 24, 2014 4:00:48 PM

Amy,

The following email came in under the Help Water generic email address which only comes to me. It appears it is questions/comments on C&H.

Kimberly A. Fuller, P.E.
NPDES Engineer Supervisor
ADEQ, Water Division
Phone: (501) 682-0643

-----Original Message-----

From: web.site@adeqinternal.state.ar.us [<mailto:web.site@adeqinternal.state.ar.us>]
Sent: Monday, March 24, 2014 3:58 PM
To: Help-Water
Subject: Questions/Comments_Web_Submission: _#1395694665328

E-Mail_Address: artzbarn@gmail.com
Name: John Murdoch
Mailing_Address: 11908 Elk Ridge
City: Wesley
State: AR
Zip: 72773-9111
Phone_Number: (479) 466-6292
H_Division: Water
H_Serial: 1395694665328
Date: 3/24/2014
Time: 3:55:02 PM

Questions_Comments:

March 24, 2014 Ms. Teresa Marks Water Division Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, Arkansas 72118-5317 I oppose this modification of the C&H Hog Farms, Inc. CAFO permit. C&H Hog Farms is requesting a revision to its Nutrient Management Plan (NMP) pertaining to the land application method for Fields 7-9. Field 7 is within several hundred feet of the Mt Judea schoolyards, several residents' homes, and at least one cemetery. Please refer to the requirements of the General Permit (ARG590000) that the NMP be developed in accordance with the Arkansas NRCS Conservation Practice Standard Code 590 (Nutrient Management). The 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. There are known human health risk associated with swine waste in the form of air borne delivery, not to mention surface and sub-surface pathways. There are abundant springs and natural waterways in that area that can provide water transport avenues for possible pathogens and contaminants. This is a concern. People of all ages from this area "traditionally" swam, fished and waded in Big Creek. I doubt one could really give a measurement of "distance in feet" that would truly signal a safe radius depending on transport conditions, so I am not addressing that. This is where scientific monitoring can "assist", but common sense is required as well. I would hope that C&H Hog Farms Inc, Cargill, ADEQ, PC&E as well as the residence of this community would have the same goal (Primary Goal), to protect the health of the people there of all ages first. Many of the groups I mentioned above may have children that attend the Mt. Judea School, maybe know teachers there, live there, want to visit the cemetery, just breathe a

breath of fresh air in the beautiful natural surroundings. I am hopeful that these considerations alone will help encourage C&H Hog Farm to drop this modification request as to be good stewards of the earth, good neighbors and show their respect for all. Before the application of any additional swine wastes to field 7, please consider doing the following:

- Complete a spatial survey using ground penetrating-radar (a minimum of 2 meters in depth) should be conducted. (This should go for fields 5,6,8 & 9 as well, at a minimum. I realize that is not on this plate at this time, but I feel it should be done). These profiles similar to the ones taken at the "new" field 5 could be most helpful to see what may not be obvious issues from the surface
- Generate 3D maps of these results to aid in refining buffer zones. Continue groundwater quality monitoring, surface water quality monitoring, to include microbial analysis in adjacent Big Creek
- Air quality monitoring at the Mt Judea School should be on going, with calibration checks and scheduled equipment maintenance by a certified company. Prior to any applications of hog waste or dead hog incineration, in or around the school "zone of breathing" (also C&H Hog Farm should notify the Mt. Judea School Superintendent). Arkansas tax money has/is being spent, many of these issues may already be in the works, but until this is completely in practice, I respectfully request that ADEQ deny the requested permit modification until these conditions have been met.

Sincerely, John Murdoch