March 24th, 2014

The following comments are in regards to C & H Hog Farms, Inc., Nutrient Management Plan Modification; ARG59001 AFIN 51-00164 C&H Farm.

I would like to state here for the record my opposition regarding ADEQ’s decision to consider a modification of the C&H Farms, Inc. CAFO permit due to the following:

One of the requirements 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.

Due to the close proximity of field 7 to the Mt Judea school and community and due to the known health risks of chronic exposure to swine waste (ammonia, hydrogen sulfide, airborne particulates and other components of swine waste known to be hazardous to human health) particularly among children and the elderly, ADEQ must consider the effects to the public health and impacts on the local community.

- Field 7 is within 250 feet of the 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.
- It is west of all of these occupied buildings, the direction from which the prevailing wind comes.

For these reasons it is highly likely that the Mount Judea School students and staff will be subjected to air quality conditions posing serious health risks for a large portion of the calendar year. The same is true for neighboring families and the community at large. I feel that ADEQ would be negligent in their duty to allow the permit modification given the very obvious concerns regarding Field 7. I respectfully request that ADEQ deny the requested permit modification

Sincerely,
Laura Timby
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Please let these comments stand for the record.

Laura Timby