

Ms. Ellen Carpenter, Chief, Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

March 24, 2014

Dear Ms. Carpenter,

The following comments are respectfully submitted regarding the proposed draft modification of the C & H Hog Farm, specifically the proposal to allow land application via Vac Tanker of swine waste to fields 7, 8, and 9.

- 1) The University of Arkansas Cooperative Extension Service Soil Analysis Report in the May 2012 Nutrient Management Plan (NMP) lists the soil phosphorus for Field 7 as above optimum at 356 lb/acre, which is much, much more than a suitable agronomic rate for phosphorus (typically 40 to 90 lb/acre). Furthermore, the USDA NRCS RUSLE2 Calculation Record in the NMP states that Field 7 is occasionally flooded. ***Therefore, swine waste, which contains phosphorus, should not be applied to field 7 until the soil phosphorus level comes down to acceptable levels***
- 2) The University of Arkansas Cooperative Extension Service Soil Analysis Report in the May 2012 Nutrient Management Plan (NMP) lists the soil phosphorus for Field 8 as optimum at 92 lb/acre, and a recommended application value for P2O5 of 0. ***Therefore, swine waste, which contains phosphorus, should not be applied to field 8 until the soil phosphorus level is below optimum.***
- 3) The University of Arkansas Cooperative Extension Service Soil Analysis Report in the May 2012 Nutrient Management Plan (NMP) lists the soil phosphorus for Field 9 as above optimum at 104 lb/acre, which is more than a suitable agronomic rate for phosphorus (typically 40 to 90 lb/acre). Furthermore, the USDA NRCS RUSLE2 Calculation Record in the NMP states that Field 9 is occasionally flooded. ***Therefore, swine waste, which contains phosphorus, should not be applied to field 9 until the soil phosphorus level comes down to acceptable levels.***

The Buffalo River, which Big Creek drains into, is phosphorus limited. Any additional phosphorus could contribute to a lowering of the water quality and aesthetics of the Buffalo, which is an Extraordinary Resource Waters (ERW) water body, and subject to the Antidegradation Policy of Reg. 2, if memory serves me right.

Sincerely,
Martin Maner
29 Coolwood Dr.
Little Rock, AR 72202

From: [Martin Maner](#)
To: [Water Draft Permit Comments](#); [Carpenter, Ellen](#)
Cc: [Shafii, Mo](#)
Subject: Comments on proposed changes to C & H Hog Farm Permit/NMP
Date: Monday, March 24, 2014 3:55:06 PM
Attachments: [BuffComments.docx](#)

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