

Public Comment Registration Card

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Date 4/20/15

Verbal Comment Speaker #

Written Comment (Attached or back of card)

Attached

Hearing Location Jasper, AR

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C&H Hog Farm General Permit ARG590000

I respectfully request that ADEQ rescind C & H Hog Farm's modification request to use vac tankers on fields 1-4 and 7-17.

ADEQ continues to allow errors, omissions, and what appears to be negligence in the NMP without requiring correction. Any and all modifications should be denied until an accurate and correct version is submitted.

I would like to reiterate the Arkansas Department of Health's comment stating that neither BMPs nor stream buffers were included in the NMP. This error only compounds the many issues already identified by ADEQ as to why a vac tanker modification should not be approved to spread waste from Waste Storage Pond #2. Without stream buffers and BMPs as well as the actual acreage correctly identified on the record by C & H for ADEQ, how can a new modification be allowed? A modification plan on paper must reflect what ADEQ requires for actual practices on the ground.

In addition, I agree with the following points that have been made by the Coalition and BRWA and I have included some of my own questions and concerns along with them:

-C & H Hog Farm's 2014 Annual Report Aggregate Phosphorus Index Spreadsheets show that fields 12 and 16 did receive waste applications for the period March - June 2014 (48,000 gallons on Field 12 and 56,000 gallons on Field 16.) Director Keogh stated that they had not and would not receive any waste until mapping irregularities were corrected. The facts contradict her.

-If there is no ADEQ approved means of spreading waste from Waste Pond 2 at this point in time, then how is it possible that C & H spreads waste on fields 7-9? Before any modification is granted by ADEQ this must be reexamined and resolved. NMP Section C, spreadsheet page 4 of 5 shows that Pond 2 waste is designated only for fields 5-9. The previous approved modification allowed use of a tanker on fields 7-9. This was further muddled by not combining these 2 modifications into the first. (Please see p. 37, BCRET Quarterly Report, January 1- March 31, 2015, Andrew Sharpley.)

-Your office requested clarification from C & H Hog Farm with regard to several issues in an email on March 25, 2015. ADEQ has not received a response from C & H Hog Farm. If there is a clarification of this issue, then it is not being made available through the Freedom of Information Act. An open and transparent process will eliminate innuendo and suppositions for all concerned. Concerned parties on all sides must have access to accurate facts and information before they can make informed comments.

-No modifications to the permit should be allowed until numerous, ongoing mapping and land ownership errors are corrected. These maps and contracts identify where waste is to be applied.

-Dye tracing studies have confirmed the numerous statements by geologists that the C&H hog factory should not be introducing raw sewage into karst topography.

-Spraying untreated sewage within a community where some residents rely on wells for drinking water, where a school is in close proximity to spray fields, and where thousands of visitors come to swim, canoe, and fish is creating a public health problem.

-Scientific monitoring of water quality in Big Creek where it enters the Buffalo National River has indicated periods when E. coli levels are elevated and dissolved oxygen is low. The ponds may be leaking and/or the run-off from fields (or both) are causing or contributing to the problem.

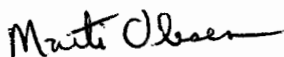
-Since the entire permitting process was flawed and did not allow for public input, it is disturbing that we are being asked to comment on only the current narrow modification and are being forced to ignore the totality of the impact this facility is having on the community and the threat it poses to the economics of the region.

-Based on the recent federal court ruling that requires a redo of the "cursory and flawed" Environmental Assessment of C&H, it is hard to understand how ADEQ can approve this or any other permit modification. By approving this modification request, ADEQ would be saying that C&H can continue in the face of the court ruling, the scientific research, endangered species protection, and public concerns.

Thank you for consideration of my comments. I write because I love the Buffalo National River and believe that it is worth the time and effort it takes to try to preserve its integrity for the present and future generations as a clear running stream and safe place for all citizens of the United States to visit and enjoy as a premier National Park. Jasper, Newton County and the Buffalo National River have been featured over the past year in the national press, for instance National Geographic, AARP, the New York Times, and National Parks publications as a Top Ten destination for tourists. ADEQ is entrusted with its mission from the public to protect the environmental quality of the waterways we love.

Will ADEQ take the necessary steps to ensure that BMP and the NMP for C&H Hog farm are being complied with before issuing a modification that is based on piecemeal data and "quick fix" stop gaps to remedy a situation that slipped through its approval process in the first place? What agency in what state would approve a Swine CAFO on karst topography above a rural school and a national river without considering alternatives?

Sincerely,



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Director
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Keogh

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