

**From:** [Nodine, Rovetta](#)  
**To:** [Water Draft Permit Comments](#)  
**Subject:** C&H Hog Farm General Permit ARG590000  
**Date:** Wednesday, April 15, 2015 3:07:47 PM

---

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

- 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, and public concerns.

Thanks,  
R. Sheri Nodine