

From: Laura Krupka [mailto:laurakrupka@att.net]
Sent: Tuesday, July 01, 2014 4:29 PM
To: Reg-Comment
Subject: Fw: APCEC Regulations 5 and 6 attn Doug Szenher

On Tuesday, July 1, 2014 4:28 PM, Laura Krupka <laurakrupka@att.net> wrote:

To whom this may concern - Mr. Szenher,

I am very concerned over the health of our environment - air, water, soil,

I am fairly familiar with the Mt Judea area of Newton county part of my family was from there and I have visited there all my life - we still have friends and family there and I still visit. It is a beautiful beautiful area of the state full of great people.

In all fairness to my friends and family there and to farmers I know in other areas I have spent much time studying CAFO's in general and in particular the C and H Swine operation that was approved and built at Mt Judea without public knowledge.

I understand that the proposed Regs 5 and 6 will not close the existing factory but will limit it to its current size.

And the proposed regs will limit the size of future hog operations in the area. This is a start in the right direction but not enough.

I have a few things to say.

1) after much study and trying to keep an open mind in fairness to farmers I have reached the conclusion that any size concentrated animal operation is a threat to the environment with the current practice of collecting all untreated waste in manure lagoons and periodically spraying the waste through the air over pastures.

2) I know there are ways of treating that animal waste. It seems to me that the big corporations (like Cargill) that back these farmers and supply the animals should be required to install waste treatment systems

3) a Town of 6500 people would never be allowed to collect all their waste in open air lagoons and then spray it around the countryside - why is that allowed with animals? animal waste carries bacteria and diseases and noxious odors and toxic gases It seems that all common sense fled in making the current regulations that permitted this hog operation

4) I truly cannot think of any place that is suitable for CAFOS with the current lagoon manure systems - there is always someone downstream and someone around to smell the bad smells.

5) Of all places to put a Swine or another CAFO with manure lagoon system I cannot think of a worse location than in the watershed of the Buffalo National River. The C and H CAFO is across a pasture from Big Creek - a beautiful lovely creek with many swimming and fishing holes - The spray fields are adjacent to Big Creek and also to Dry Creek which enters Big Creek

This area is karst topography with many porous underground routes straight to the creeks and then just a few miles (6) to the Buffalo River-

The current regs allow up to 5000 gallons/day seepage from the lagoons

Why anyone in charge of protecting our environment thinks this is permissible I have no idea - all common sense fled when that rule was written and any common sense that was left was not used when permitting this CAFO in the Karst topography of the Buffalo National River Watershed

Now as to the proposed regulations of restricting the size of Future CAFOS to up to 750 swine over 55 lb and no more than 3000 pigs less than 55 lb- That is still TOO MANY with the current practice of leaking, untreated manure lagoons .

also, I read through all the field tests of phosphorus and nitrogen levels - many of those fields are already maxxed out as to the particular nutrient levels.

These regs - 5 and 6 are a start in the right direction in preventing C and H from adding more swine and they are a start in limiting the total swine to 750 adults with 3000 young - that is still a total of 3750 which is not much less than C and H current numbers of 2500 sow + 4000 piglets + 3 boars=6503 swine total

the kind of laws you should be making should be NO CAFOS in the Buffalo river watershed as they are currently constructed and you should require the big corporations behind these CAFOS to install waste treatment systems and odor mitigation measures

The concentration of animals is the problem C and H has 6503 hogs on 23 acres with 2 ponds allowing to leak 5000 gal per day of waste - straight into the watershed

I hope and pray that there with be no catastrophes of lagoon fails from floods, storms etc as there has been in other states

Another rule that needs changing is that communities need to know if a neighbor is planning on installing A CAFO in their community I believe that people should be able to do honest work and make a living on their land until whatever they are doing harms their neighbors.

In my opinion the proposed Regs 5 and 6 are a start but not nearly enough.

Please do not allow any more CAFOS - in Buffalo River watershed

I know one of the arguments for CAFOS is that there have always been hog operations in the area - but they were not nearly the size of C and H - a 300 -500 hog operation is nothing compared to 6,503 swine.

I am a concerned citizen of Arkansas please protect our state the Buffalo River is a jewel that we do not want to lose - likewise I do not want to make a visit to the hills and valleys of Newton county only to smell the stench of hogs nor be scared to get in a swimming hole or the Buffalo River

I know there is a hog CAFO near Dardanelle - it is in a beautiful area of streams leading to the Arkansas River- we are just being stupid if we do not protect our waters and our air and our soils

The evidence against the environmental dangers of CAFOs is very easy to find. We should require treatment of the animal waste and also require measures to mitigate odors.

Thank you for your consideration of my remarks

Laura Krupka