

Alice Andrews

I fully support ADEQ's draft Regulation 5 permit denial for C & H Hogfarm at Mt. Judea, Arkansas. Please see my attached comments as an individual and my request that the comments submitted by The Ozark Society, are incorporated by reference, word for word.

Since 1971, I have canoed the beautiful, spectacular waters, high bluffs, the flora and fauna and peace of the Buffalo National River.

The wildlife - birds, otters, deer, bobcats, mink waterfowl have enchanted me, along with watching the light change on the bluffs, now there is unbelievable volumes of algae clogging the channels of the Buffalo. There is compelling scientific evidence that excess nutrients from C & H Hogfarm's concentrated animal feeding operation, is polluting the Buffalo River, as well as it's tributary, Big Creek. Comments attached.

Thank you,

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ADEQ decision on draft denial of Regulation 5 permit for C & H Hogfarm,
permit # 5264-W. Comments submitted October 17, 2018

I support ADEQ's draft decision to deny C & H Hogfarm at Mt. Judea a Regulation 5 permit to operate a large, 6500 plus, concentrated animal feeding operation, (CAFO) for the following reasons:

C & H Hogfarm should never have been permitted to operate in the first place, primarily because of its location, sited on well-documented karst (porous limestone, hydrogeologic terrain). This type of porous terrain, where C & H Hogfarm has been spreading liquid hog waste, rich in phosphorus, nitrates, other nutrients and bacteria for more than five years - allows rapid transport of these nutrients to streams, springs, wells. Big Creek, a large tributary to the Buffalo National River as well as the Buffalo River have now inherited the pollution caused by excess nutrients and bacterial pathogens. These pollutants cause intense algal blooms to thrive in the waterways to the extent that both Big Creek and the Buffalo National River have recently been declared impaired by ADEQ, on the 303 (d) list of impaired streams for pathogens and low dissolved oxygen.

Consequently, the Arkansas Department of Health has issued two letters warning the Public of the dangers for both humans and animals (especially dogs) of body contact with toxic algae.

The permit should not be granted because C & H Hogfarm has not complied with the USDA Agricultural Waste Management Field Handbook, (AWMFH) regarding the siting of the Hogfarm on karst, without the required hydrogeologic assessment.

Furthermore, C & H Hogfarms stores hog waste in two leaking storage ponds. They apply the waste to, at least, 33 fields as fertilizer in such excessive amounts that the fields are saturated with phosphorus, far beyond agronomic need. In rain events, this waste runs off into local streams in the Buffalo River Watershed. The liners in the storage ponds are faulty, at best.

The AWMFH, 651.1000 (4) states that “The location of a facility is an extremely important consideration during the planning process for the hogfarm, to minimize exposure to vulnerability and risk

C & H Hogfarm is not in compliance with Regulation 5.102 nor 5.402, again with reference to the AWMFH. C & H is discharging raw hog waste to the waters of the state in violation of Regulation 5. Given that the Buffalo National River is federally designated an Outstanding National Resource Water, the anti-degradation policy and designated uses are being violated under the Clean Water Act.

Granting this permit to C & H Hogfarm would violate Regulation 2.203 by allowing the water quality of the Buffalo National River to keep declining.

The requested Regulation 5 permit for C & H Hogfarm intends to increase the number of hogs from 6,500 to 6,878. The Arkansas Pollution Control and Ecology Commission Moratorium, in place since 2016, prohibits an increase in the number of swine by Regulation 5.901(d). **The Moratorium should be made permanent!**

There is no emergency plan for the possibility of ponds overflowing in heavy rain events.

For these reasons, and the sake of Tourism (a top economic driver for Arkansas), the Regulation 5 permit for C & H Hogfarms should not be granted. I fully support ADEQ’s draft decision to deny the Regulation 5 permit.

I also wish to incorporate by reference, word for word, the comments submitted by The Ozark Society, both the previous and current 2018 comments.

Thank you for the opportunity to comment.

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