

I would like to thank you for the opportunity for the Arkansas Pork Producers Association (APPA) to comment on the C & H Draft permit (5264-W). The APPA would like to ask that the permit denial be reversed and approve the draft permit.

C & H has been in operation for the past 5 years and has been the most inspected facility in the history of pork production in Arkansas. They have never had a violation recorded against their operation (Regulation #6). It is one of the best if not the best operated Pork Production facility in the state. C & H has always worked with ADEQ to comply with the exceedingly extra burdens of the going the extra mile to try to satisfy public concerns that were unfounded. They agreed to the BCRET study on Big Creek. This study has been very comprehensive and has yet to show that C & H is impacting the water quality of Big Creek or the Buffalo River. They agreed to the Harbour Drilling study that proved their is not leakage coming from the holding ponds.

It was quite evident at the recent public hearing in Jasper (October 16, 2018) that the citizens of the Mount Judea area are very supportive of C & H Hog Farm. For the most part the opposition are outsiders who are extreme activists that have a political agenda that is much more far reaching than C &H Hog Farm.

The real truth of the matter is that the attitude from ADEQ to C & H changed somewhere in about November of 2017. The communication and working relationship changed between ADEQ towards C & H. ADEQ kept asking for more information that has never been asked of a Reg. 5 permit applicant in the past. C & H submitted the extra final information to ADEQ on December 29, 2017, they asked in an email if there was anymore information needed. ADEQ responded back that the application was complete only to find out this permit application was denied because there was more information needed. Never in the history of Reg 5 has a producer been held to a higher standard than C and H. The APPA and its members believe this permit denial has been politically motivated. C & H permit decision should be based off of their application not a moving target that is controlled by politics.

The APPA would like to ask for a reversal on the current decision and allow C & H to work with ADEQ to supplement the record.

Sincerely,  
Jerry Masters  
Executive Vice- President  
Arkansas Pork Producers Association