



Big Creek Valley

March 21, 2014

Ms. Teresa Marks
Water Division
ADEQ
5301 Northshore Dr.
NLR, Ar 72118-5317

Director Marks,

I am commenting on the Modified Draft Permit ARG590001, AFIN 51-00164 request by Jason Henson, owner of C & H Hog Farms.

Knowing that you are unable to be in the Mt Judea area to see the alignment of the request to use Field 7-9 I have included a map in which I have placed some items of interest to your use. This is a photograph taken recently of the area and I've used Google Earth for distances and proper alignment.

Looking at the visual you will see spray field #1 easily identified with an active rock quarry in the left corner. I used the gps coordinates supplied by Jason Henson in the May 2012 Nutrient Management Plan to locate the manure spray fields.

Big Creek runs south to north thru the center of the photo, to the west of field 2, 3, 4, and the school track, and east of field 7, 6, and 5. Big Creek runs north to the Buffalo River. Approximately 6 miles.

Field 7 is a large field that extends the whole distance below the Mt. Judea school. Since it is lower in elevation than the school and to the west of the school using it as a spray field at any time should not be considered. The prevailing winds are from the west-southwest. The field elevation is lower than the school and as odors rise with the heat of the day so does the concentration of odors at the school and community of Mt Judea. The daily odors at the school are already overwhelming enough to cause noticeable physical changes.

Find the track at the school, Field 3 is visible a stone's throw away at 112 yards southwest of the school. The field is SW of the store, restaurant, churches and many homes.

Big Creek separates the school from the spray field. Though there is a buffer, of a 100' specified for runoff into Big Creek there is no buffer for noxious odors or nuisance odors. This odor is particulates of feces that permeate the air and destroy another valuable and treasurable resource. The odor at times is strong enough to cause nasal and throat burning, headaches and changes of temperament. Those whose sight has diminished use other senses to explore scenery and enjoyment.

Jason Henson has requested to increase his application of hog feces in yet larger concentrations by the use of a vac tanker and the use of the spray gun to fields closest to the school and community. As you see by the photo the school is only ½ mile from the C&H Cafo facility. The CAFO itself owns only 23 acres and must rely on lease agreements to apply its waste. These agreements show no owner updates though discrepancies apply.

Fields 8 & 9 are SW of Mt Judea,. The predominately SW winds will push the air into the school and Mt Judea community. The 1,000,000's of gallons of liquid hog feces from fields 11-17 will

continue to rise from the valley floor, be trapped in the inversion layer at night, and drain to the valley floor of Big Creek where it will be transported, as all drains work, to the Buffalo River.

There has been no update soil analysis to verify that applying waste from pond 1 & 2 are essential to the plant uptake or time of uptake in fields 7-9. Therefore just making a request and receiving a reply shows no scientific validation to the request. The only thing it supplies is an assurance to the CAFO owner that he can apply waste close to his barns, pretty much anytime he deems necessary, with specified "emergency" use to Field 7. Soil test by the U of A show all nutrient levels "above optimum". Therefore applying waste from pond #1 would create more threat to Big Creek therefore more threat to the Buffalo River.

I realize the owner is unable to foresee the incredible destruction due to the 6,500 animals that continue to defecate and fill the lagoons, that evidently were not built to specifications or the animals are bigger waste producers than his engineer predicted, but to continue to destroy a community without scientific validation should be cause to revoke this permit.

Due to the discrepancies of the NMP and its flaws that are obvious I cannot recommend modifications of any kind to this NMP. There are word changes noted in other sections of this plan and elimination of all signatures but Nathan Pesta, PE. Not even the owner signed the current NMP change. In a phone call to ADEQ this week I was told the only change this NMP would address was the modifications of field 7-9. Unfortunately, I am wary. When a plan as flawed as this one is continually band aided it is eventually a real mess....as this one has become.

Recognizing, admitting, and correcting errors is more important than to continue the destruction of a unique karst community that this state has valued as its "Natural State".

Sincerely,

Carol Bitting

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