

Thank you for the opportunity to comment on the draft denial for permit application #5264-W.

I support ADEQ's proposed decision to deny C & H Hog Farms' permit application after determining that the record lacks necessary and critical information to support granting of the permit, and the record contains information that the operation of this facility may be contributing to water quality impairments of waters of the state.

ADEQ's proposed decision to deny the permit application, which incorporates but is not limited to the science-based information contained in the expert reports, expert depositions, and Big Creek Research and Extension Team (BCRET) data, indicates the following with regard to the C & H Hog Farm facility:

- karst-highly permeable foundations- at the site of the C & H Hog Facility
- increased nitrate-N in both the ephemeral stream and the house well, which suggests hydrological connections to areas where farm activities take place
- BCRET study does not qualify in any regard as a geologic study
- potential for groundwater contamination
- void/fracture beneath the ponds
- a liner does not protect against a collapse in the event of a large void in karst
- potential for sinkholes to open up with collapsing ground or cause differential settlement
- seepage is the same thing as a leak
- a leak could occur when the pond is pumped down periodically to remove the waste and get the solids
- C & H facility may be contributing to water quality impairments of Big Creek and the Buffalo National River

ADEQ states that the ultimate aim of the Arkansas Pollution Control and Ecology Commission (APC&EC) and the Animal Waste Management Field Handbook (AWMFH) is that pollutants are not being released from the facility and its operations, into waters of the State.

ADEQ's inclusion of the waterbody impairment issue with respect to the *existing* point source facility and its operations has brought the ARG590001 permit into full scope of the draft denial decision for permit application 5264-W.

Therefore, to achieve the ultimate aim that pollutants are not being released from the facility and its operations into waters of the state, I urge that ADEQ not only to take immediate action with regard to a thorough geologic investigation as outlined in the Statement of Basis, but that it adhere to its legal obligation and conduct an immediate and thorough investigation to identify any and all unauthorized illegal discharges from C & H Hog Farm - NPDES Permit ARG590001- to impaired waterbodies.

Dane Schumacher
4059 CR 516
Huntsville, AR 72740

