

From: [alice andrews](#)
To: [Water Draft Permit Comments](#)
Subject: Ozark Society Comments re EC farm draft permit
Date: Friday, April 08, 2016 1:12:31 PM

Attention: Katherine McWilliams

To whom it may concern:

The Ozark Society OPPOSES the draft approval of EC Hog Farms modification request, Permit # 3540-WR-7, AFIN 51-00020.

Reasons: We wish to incorporate, by reference, all the comments submitted by Buffalo River Watershed Alliance, as our own.

Additionally, The Ozark Society is greatly concerned about the excessive amount of hog waste to be applied to fields, the majority of which are sited on limestone, karst, porous topography and thin soils. These E C fields for spreading waste are adjacent to a major tributary of the Buffalo National River, the Little Buffalo, as well as adjacent to two creeks, (Shop Creek and Left Fork of Big Creek) two tributaries to the Little Buffalo. If permitted, this will be a tragic repeat of the siting of C and H Hog Farm application fields on karst where hog waste from leaking storage lagoons can make the trip to ground water via fractures, cracks, sinkholes in the karst and/or when floods on the Buffalo, Big Creek (big rain events) can flush waste off application fields into watershed streams and directly to the Buffalo National River.

Further, one of the spreading fields is only 2.5 miles from Hurricane Creek, an ERW stream and is already on the 303(d) list of impaired streams. Please remember, most of these application fields are sited on karst - an area with many caves, springs and water pathways to groundwater.

We also wish to emphasize that the multiple ownership transfers and modification, ADEQ is avoiding appropriate enforcement of state regulations by permitting C & H Hog Farms to increase its acreage of application fields without modification of it's own nutrient management plan and then avoids reopening the C & H permit for public comment. This process is disingenuous, to say the least.

The ADEQ documents related to this permit modification do not make clear WHO is the actual owner of EC Farms. Is it Richard Campbell, Ellis Campbell or ??? This should be made clear and accurate. This entire permit modification process is full of errors, confusing statements and is unacceptable.

Please void 3540-WR-6 and deny modification of permit 3540-WR-7.

Respectfully submitted,

Alice B. Andrews,
Conservation Chair
The Ozark Society

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