

Attention: Katherine McWilliams

Note: A few of these comments are in addition to those filed via email on March 8th, 2016.

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

The Ozark Society is greatly concerned about the excessive amount of hog waste to be applied to EC 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) both tributaries to the Little Buffalo. The amount of pollutants contributed to these tributaries are inherited by the Buffalo National River.

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 quickly make the trip to ground water via fractures, cracks, sinkholes in the karst and/or when floods on the Buffalo and Big Creek (big rain events) can result in flushing swine waste off application fields into watershed streams and directly to the Buffalo National River. Please remember, most of these application fields are sited on karst - an area with many caves, springs and water pathways to groundwater. The same geographical area has endangered bats depending on the forage available there.

One of the application fields is in the Hurricane Creek watershed; Hurricane Cr. is designated an ERW stream. It is already on the 303(d) list of impaired streams. This likely brings the Clean Water Act and Anti-degradation Policy into play, since ERW streams must have the highest level of protection. In any case, this factor should be resolved prior to approving the modification permit. Aside from Hurricane Creek being an ERW, this area of forest is federally designated the Hurricane Creek Wilderness.

We wish to emphasize that the multiple ownership transfers and permit modification request places ADEQ in the position of avoiding appropriate enforcement of state regulations by permitting C & H Hog Farms to increase its acreage of application fields without modification of its own nutrient management plan and further, then avoids reopening the C & H permit for public comment. This process is disingenuous, non-transparent and disrespectful to the Citizens of Arkansas who rightly expect to have our natural resources protected by the Agency designated for that purpose

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. It does seem clear that EC is not an "operating" hog farm,

has no swine, no waste storage lagoons but the intent is to apply approximately 6,654,000 gallons to EC fields!

This is a vast increase in C & H hog waste. Why so much more waste than the 3 million plus gallons the 2015 Annual Report indicates. Obviously, this makes one think an expansion of C & H is in the works.....This entire permit modification process is replete with errors, confusing statements and is unacceptable for consideration as it stands.

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

Respectfully submitted,

Alice B. Andrews,
Conservation Chair
The Ozark Society

501-219-4295 or <alice209ok@yahoo.com>