

From: [Brian Thompson COM](#)
To: [Keogh, Becky](#); [Water Draft Permit Comments](#)
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Subject: Comments on EC Farms modification 3540-WR-7
Date: Monday, April 11, 2016 10:22:11 AM
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Comments to be turned in this evening at Jasper meeting.

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Directory Keogh:

I am writing today to express my continued concern about pollution flowing into the Buffalo National River due to the creation of the C&H hog operation. Recent analysis by the National Park Service, and the Big Creek Research and Extension team (BCRET) data has shown that in 2014 E. coli levels exceeded the state level for contamination on the section of Big Creek that is directly adjacent to the C&H hog operation and the manure spreading fields. The most recent soil tests show that the level of phosphorous is above optimum on 16 out of 17 manure fields. It is difficult to safely get rid of 3 million gallons of untreated hog manure generated annually in a karst environment.

Now I read that C&H wants to expand its manure spreading fields to the Left Fork of Big Creek and to Shop Creek that flows into the Little Buffalo

River. The Left Fork of Big Creek already has elevated E. coli levels likely from contamination from the existing C&H manure fields. Dye tracing studies initiated by Dr. Brahana demonstrated the portal for nutrients to travel from C&H hog operation to the Left Fork of Big Creek in less than one week. This interconnectivity of watersheds is very troubling given that most of the current and proposed manure fields sit atop karst terrain. A visual inspection of the Left Fork shows that there is clearly a problem right now, even before EC farms is allowed to spread.



Director Keogh, you have publicly assured citizens as well as the Arkansas legislature that ADEQ can effectively address concerns regarding the three polluted tributaries of the Buffalo National River. By allowing EC Farms to spread directly adjacent to the Left Fork when it already exhibits dense algae matts is a clear lack of good faith and good judgement by ADEQ. This does not instill confidence in your departments ability to manage the state's most valuable and irreplaceable resources and confirms in the minds of many that yours is a department with a political agenda.

The permit request by EC Farms appears to be a sleight of hand. The original permit was for a small hog CAFO with only 300 hogs. It was closed with no ponds and no animals during 2013 and 2014 and they did not provide an annual report to ADEQ as required. A moratorium on medium and large hog CAFOs in the Buffalo River Watershed was enacted on May 6, 2014. Yet in 2015 the permit was transferred to a new individual from a co- owner of C&H to a relative. This violates the intent as well as the spirit of the temporary moratorium.

If EC Farms is granted this new permit, the manure from C&H will lead to



further contamination of the Buffalo River Watershed. Please deny this permit and please protect the Buffalo River. Let me remind you that this is our only national river in the state of Arkansas and should have the highest degree of protection.

Sincerely,

Brian A. Thompson
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Cc delivered via email:

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 - Miranda Hodgkiss, U.S. Environmental Protection Agency.
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 - Judy Dasovich, Chair, White River Group of the Sierra Club. jdaso@aol.com •