

From: [Fay Knox](#)
To: [Water Draft Permit Comments](#)
Subject: EC Farms Permit #3540
Date: Monday, April 11, 2016 6:36:57 AM

I am concerned about EC Farms Permit #3540 for the following reasons.

The 6 million gallons of waste annually that EC Farms proposes to spread is twice the current annual waste production of C&H, the sole source of waste accepted by EC farms. Besides fields bordering or draining into other private property some waste spreading fields border or drain into USFS with numerous caves and bat roosts.

The means of transportation of the waste is worrisome as heavy tanker trucks are expected to travel across steep winding gravel roads where accidents causing spills into streams is possible.

C&H waste will be applied to several fields along the Left Fork of Big Creek, the headwaters of the Little Buffalo River and Shop Creek which flows into the Little Buffalo River. Once again no consideration is being given to the karst geography. The Left Fork of Big Creek has elevated E. coli levels. Dye tracing studies initiated by Dr. Brahana demonstrated the ability of nutrients to travel through karst substrata from C&H hog operation to the Left Fork of Big Creek in less than one week. Most of the C&H Hog Farms manure fields sit atop karst terrain.

One of the spreading fields of EC farms is within three miles of Hurricane Creek, which is listed as an ERW on the 2008 303(d) list. ADEQ should not allow an additional potential contaminant load on Hurricane Creek.

NPS requested that Big Creek be added to the 303(d) list of impaired streams due to low dissolved oxygen based on measurements taken by the USGS station near the mouth of Big Creek at Carver. The main fork of Big Creek by C&H shows evidence of impairment by e coli as documented by the Big Creek Research and Extension Team's data. The Left Fork of Big Creek contains abundant algae mats. According to recent soil tests, many of the C&H spreading fields are now showing "above optimum" levels of phosphorus, a potential source of contamination of the main fork of Big Creek for the foreseeable future even if spreading is discontinued. The waste application in the Left Fork of Big Creek proves that ADEQ is not mitigating pollutants detected at Carver.

The Big Creek Research and Extension Team study will not be valid unless the Governor designates additional hundreds of thousands of dollars to monitor these additional field.

Sincerely

Fay Knox
HC 62 Box 692
Deer AR 72628