



United States Department of the Interior
NATIONAL PARK SERVICE
Buffalo National River
402 N. Walnut, Suite 136
Harrison, AR 72601

IN REPLY REFER TO
1.A.1 (BUFF)

April 8, 2016

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

Submitted via electronic mail to Water-Draft-Public-Comment@adeq.state.ar.us

RE: 3540-WR-7

Dear Ms. McWilliams:

We are glad to see that ADEQ will hold a public meeting regarding the permitting of EC Farms to spread waste from C&H Hog Farm, Inc. (C&H). The level of public interest and controversy surrounding C&H makes this a prudent step.

The National Park Service (NPS) remains concerned about the impacts from the operation of C&H on the waters of Big Creek and the Buffalo River. The NPS also is concerned about potential additional impacts which the operation of EC Farms may place upon the waters of Big Creek, the Little Buffalo River, and the Buffalo River.

As noted in our letter of September 18, 2015, except for one small field, all of the waste application fields EC Farms proposes to utilize are in the Buffalo River watershed. NPS also noted in that letter that over one-third of the spreading field acreage is on karst terrain.

The recent report on the Electrical Resistivity Imaging (ERI) survey conducted for Big Creek Research and Extension Team (BCRET) by Jon Fields and Dr. Todd Halihan at Oklahoma State University (Field and Halihan, 2016) shows that the three spreading fields studied are underlain by karst with numerous sinkholes which do not show up on the surface of the land. The report also shows electrically conductive fluids, possibly swine waste slurry, travelling down into the epi-karst below these fields (Figure 1). Allowing the

spreading of untreated liquid waste to fields underlain by the Boone and Pitkin (karst) Formations could put water quality on the Buffalo River at risk. To be protective of the groundwater, a minimum 100 foot buffer should be applied on fields or portions of fields that lie up strata of these limestone formations.

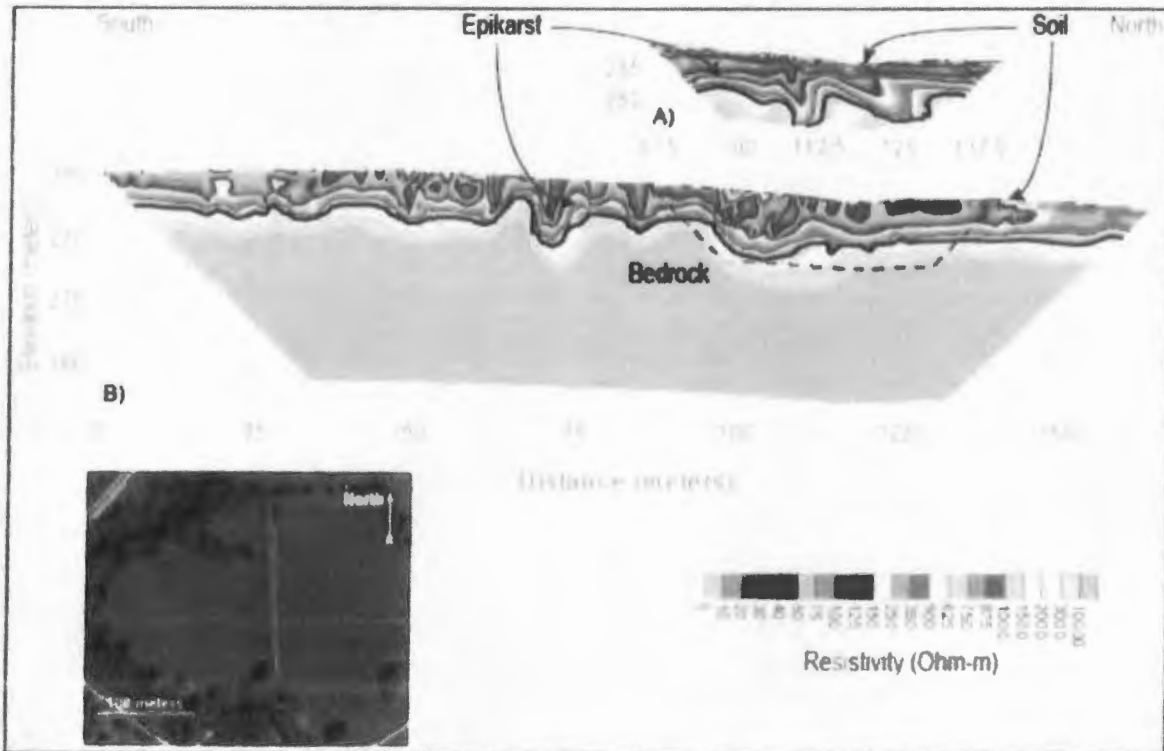


Figure 1: ERI data for C&H Field 1. This image is figure 17 in 2016 ERI report. (Field and Hallihan, 2016, pg. 32)

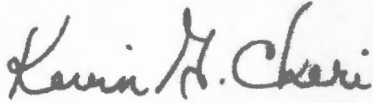
NPS has additional concerns about modifying this permit. Public records on the ADEQ website indicate that C&C Hog Barn (permit tracking number 3540-WR-5) failed to submit their annual report as required by Arkansas Pollution Control and Ecology Commission Regulation 5 (Reg. 5), specifically 5.407(E). The reports were not submitted until December 18, 2015.

NPS also is concerned about the permit transfer from C&C Hog Barn to Ellis Campbell, particularly the significant increase in swine waste application the fields under this modification could receive. The transfer form indicates that there would be no operational changes to warrant a permit modification. However, C&C Hog Barn has not been in continuous operation. According to the 2011 Waste Management Plan for C&C Hog Barn, approximately 411,535 gallons of waste water were produced each year. C&H, being a large CAFO, produces a much greater volume of waste water, nearly 2.1 million gallons annually. The permit modification would allow EC Farms to apply up to 4.7 million gallons of waste from C&H Waste Storage Pond (WSP) 1 or 6.5 million gallons of waste from C&H WSP2.

We are concerned that a permit transfer for EC Farms would become, in essence, a modification for the operation of C&H Hog Farms that could allow substantially more

swine waste application in the watershed. We owe it to our nearly 1.4 million visitors to hold the Buffalo River, and by extension its tributaries, to the highest standards for water quality.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin G. Cheri". The signature is fluid and cursive, with the first name "Kevin" being more prominent.

Kevin G. Cheri
Superintendent

Electronic Cc:

Bill Honker, EPA, Region 6 (honker.william@epa.gov)

Kane Webb, Director, Arkansas Parks and Tourism (kane.webb@governor.arkansas.gov)

Nathaniel Smith, MD, Director, Arkansas Department of Health (nathaniel.smith@arkansas.gov)

Mike Knoedl, Director, Arkansas Game and Fish Commission (mike.knoedl@agfc.ar.gov)