

From: [Kathleen Marleneanu](#)
To: [Water Draft Permit Comments](#)
Subject: EC Farms Permit #3540-7
Date: Friday, April 08, 2016 4:18:31 PM

ADEQ,

As a lifetime resident of Arkansas (from Jasper, currently in Maumelle), I am just one of many who knows the preciousness of our Buffalo National River and watershed area, both in terms of natural value and the tourist industry it creates.

I, along with many others, am sincerely concerned about the pending request by EC Farms to accept swine waste from C&H and apply up to 6.5 million gallons per year to approximately 600 acres, some of which is in the Little Buffalo watershed, at the head of Shop Creek and at the head of the East Fork of the Little Buffalo, above Murray.

I trust you will take our concern, and the facts to back it up, to heart, and make the best decision for our state, the Natural State, by not approving EC Farms' request.

Thank you so much,
Kathleen Malm Marleneanu

Below are specific concerns of the Buffalo River Watershed Alliance which I echo:

A) The National Park Service has 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. Big Creek is composed of two large branches. The main fork where C&H is located is showing evidence of impairment by e-coli. This evidence is found using the Big Creek Research and Extension Team's own data. The Left Fork of Big Creek does not have specific science available showing that it is impaired, but a visual inspection shows that there is evidence of nutrient loading as seen in this photo showing abundant algae mats.

Some of the largest spreading fields to be used by EC Farms are directly adjacent to the Left Fork of Big Creek. ADEQ has assured the public as well as the state legislature that it fully intends to address Big Creek pollution. According to recent soil tests, many of the C&H spreading fields are now showing "above optimum" levels of phosphorus, which will likely continue to be a potential source of contamination of the main fork of Big Creek for the foreseeable future even if spreading is discontinued. By now allowing waste application in the Left Fork of Big Creek, ADEQ is not demonstrating good faith in mitigating pollutants detected at Carver. These conditions are certain to deteriorate if ADEQ allows permit 3540-WR-7 to go forward.

B) One of the spreading fields of EC farms is within three miles of Hurricane Creek, which is listed as an Extraordinary Resource Water (ERW). This ERW is also listed on the 2008 303(d) list (the last one actually approved by EPA) for bacterial contamination. ADEQ is clearly not acting in the interest of the State of Arkansas' ERW resources by allowing an additional potential contaminant load on Hurricane Creek.

We request that ADEQ use scientific evidence to avoid further pollution of the Left Fork or Big Creek as well as Hurricane Creek. We request that ADEQ use good judgment in regard to their stated purpose of protecting Arkansas' most precious natural resources.

C) C&H waste will be applied to several fields along the Left Fork of Big Creek, in the headwaters of the Little Buffalo River and the headwaters of Shop Creek which flows into the Little Buffalo River. The Left Fork of Big Creek already 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. This interconnectivity of watersheds is of significance given that most of the EC Hog Farms manure fields sit atop karst terrain.

D) EC Farms proposes to spread up to 6 million gallons of waste annually. This is more than twice the current annual waste production of C&H which is designated as the sole source of waste accepted by EC Farms.

E) Several waste spreading fields border or drain into USFS property where there are numerous caves and bat roosts. Two endangered bat caves are located nearby.

F) Heavy tanker trucks (honeywagons) will have to regularly negotiate steep winding gravel roads increasing potential of accidents and spills and discharge to waters of the state.

G) How will this expansion of fields affect the Big Creek Research and Extension Team study? Will the current study remain valid? Will the Governor designate additional hundreds of thousands of dollars to monitor these additional fields?