

April 11, 2016

TO: ADEQ

RE: EC FARMS Permit # 3540-7

Dear Director Keogh,

I am writing to inform you of my opposition to the approval of Permit # 3540-7 by ADEQ that would allow EC Farms to spread hog waste from C+H Farms; up to 6 million gallons to be exact. This same waste would be transported from C+H in Tanker trucks over county roads and applied to the fields of EC Farm.

My opposition is based on these observations:

- #1. The C+H fields are already showing "above optimum" levels of phosphorous. Contamination of Big Creek has been documented and serious concern regarding the spreading of this waste over Karst topography along the banks of a tributary of the Buffalo National River, pose a real threat to the water quality and aquatic life in the Buffalo.
- #2. The fields of EC are also along fields that ~~are~~ tributaries of the Little Buffalo and are also over Karst terrain posing the same threats and risk of pollution to the Buffalo River as C+H Farms has.

#2 continued - I fail to see the reasoning (2)
that would justify spreading more waste
on more sensitive areas and
impacting more sensitive areas
within the Buffalo River watershed, and
allowing more pollution to reach the
Buffalo, not just from Big Creek but
now with this higher up the river from
the Little Buffalo.

#3. I am opposed to transporting up to
six million gallons of hog waste by
truck over Newton County roads - narrow
winding gravel roads - with an
increased risk of spillage and
accidents, posing a risk to waterways
and the residents of Newton County.
These county roads are not up to the
standards that would accomodate this
kind of transport, posing an increased risk of
a toxic spill.

#4. It is questionable at best even suspect,
that ADEQ continues to push for the
spreading of this waste of C+H farms.
Rather than protecting the sensitive
pristine waters of the state, ADEQ
appears to be acting on behalf of C+H
and other large polluting sources at the

4th cont

(3)

expense of our ERW's and the Buffalo River, as well as other springs and streams within our region. I see ADEQ being woefully derelict in their responsibility to protect the environmental quality of our states waterways. This issue has cost the taxpayers a lot of money yet I fail to see where ADEQ gives the residents of Newton County, those landowners along the river, and ~~and~~ citizens of Arkansas adequate consideration and trouble shooting to solve this problem. And believe me this is a huge problem and it has not been adequately addressed. I ask that you deny this permit modification. Sincerely,

Laura Limby
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