

From: [My Blue Heaven](#)
To: [Water Draft Permit Comments](#)
Cc: [My Blue Heaven](#)
Subject: Comment of Objection to EC Hog Farms Permit #3540-7
Date: Friday, April 08, 2016 4:13:20 PM

Director Keogh and ADEQ Staff,

I am extremely concerned as a stakeholder and resident of Newton County Arkansas that ADEQ has allowed EC Farm a transferred permit from C&C Farm with significant modification to the original that allows spreading up to 6,500,00 gallons of C&H Swine factory into tributaries of the Buffalo National River without adequate scientific review. This amount of untreated hog manure spread at up to 10,000 gallons per acre per year in shallow soils with underlying karst topography is a such a major departure from the original permit that a new permit should be required. Oh, except there is a 5 year ban on medium and large CAFO's in the Buffalo River Watershed set forth in Regulation 5 by the State Legislature and approve by the PC&E. Why is EC being given a pass by your agency? To allow this existing permit to morphed at the whim of the owners and then allow them to self report soil samples once a year is wholly inadequate to protect the waters of the state. In three years C&H has reached near maximum allowed levels of phosphorus on it's field in Mt Judea and degradation of Big Creek, a major tributary of the Buffalo National River, is beginning to show up as documented by U S Park Service and USGS water testing. This is confirmed by your recent listing of Big Creek as a category 3 in 303 d list of impaired waters of the state. I believe this is a blatant violation of mission of ADEQ to protect the waters of the state of Arkansas. I question whether ADEQ is adhering to the Federal Law requiring Anti-degradation Policy at 40 CFR §131.12. ADEQ is required by 40 CFR §131.12(a) to develop and adopt a statewide anti-degradation policy and to identify methods for implementing that policy. I believe allowing EC, which was inspected by the NCRC, an agency for the State of Arkansas, filing a closure report in 2013, to reopen as a massive raw animal waste disposal dump of this magnitude will continue to degrade the waters of the state.

This should not be allowed by ADEQ and it is your responsibility to protect the public and our water resources. Bending the rules for C&H undermines the public trust in the willingness of ADEQ to protect us and puts the waters of the State of Arkansas at certain risk.

Respectfully submitted,

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