

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317
Re: EC Farms Permit #3540-7
Water-Draft-Permit-Comment@adeq.state.ar.us

Dear Director Keogh:

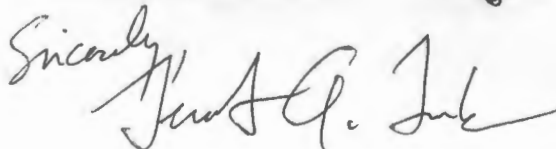
My name is Teresa Turk and I am presenting this information as a private citizen.

I am speaking today due to my continued and increasing concerns about pollution flowing into the Buffalo National River due to the creation of the C&H hog operation. Recent analysis by the National Park Service of the Big Creek Research and Extension team (BCRET) data has shown that in 2014 E. coli levels exceed the state level for contamination on the section of Big Creek that is directly adjacent to the C&H hog operation and the manure spreading fields. The most recent soil tests show that the level of Phosphorous is above optimum on 16 out of 17 manure fields. It is difficult to safely get rid of 3 million gallons of untreated hog manure generated annually in a karst environment.

Now I read that C&H wants to expand its manure spreading fields to the Left Fork of Big Creek and to Shop Creek that flows into the Little Buffalo River. The Left Fork of Big Creek already has elevated E. coli levels likely from contamination from the existing C&H manure fields. Dye tracing studies initiated by Dr. Brahana demonstrated the portal for nutrients to travel from C&H hog operation to the Left Fork of Big Creek in less than one week. This interconnectivity of watersheds is very troubling given that most of the current and proposed manure fields sit atop karst terrain.

The permit request by EC Farms appears to be a sleight of hand. The original permit was for a small hog CAFO with only 300 hogs. It was closed with no ponds and no animals during 2013 and 2014 and they did not provide an annual report to ADEQ as required. A moratorium on medium and large hog CAFOs in the Buffalo River Watershed was enacted on May 6, 2014. Yet in 2015 the permit was transferred to a new individual from a co-owner of C&H to a relative. Now the relative, Ellis Campbell, wants to spread C&H manure to over 30 separate parcels in Newton County. This is illegal and should not be allowed to occur.

If EC Farms is granted this new permit, the manure from C&H will lead to further contamination of the Buffalo River Watershed. Please deny this permit and please protect the Buffalo River. Let me remind you that this is our only national river in the state of Arkansas and should have the highest degree of protection. Please follow the Clean Water's Act intent and regulations. You are negligent in your duties to the people of Arkansas and the nation by allowing the Buffalo River and its tributaries to be degraded. Who killed Big Creek? ~~Re: EC Farms~~

Sincerely,


1408 W Cleveland St.
Fayetteville, AR 72701

① What are you going to do about the BCREO study because the tax payer has already spent \$800,000 & there are only 2.5 years of data. Sharpley says he needs 5 years of data so what will happen to this study? I would like an answer.

I am also concerned about the 10 acres that are in the Hurricane Creek area. With ~~any additional~~ ^{the} excess of 3 Million gals of animal waste, (6 Million total) I think there is a possibility that another CAFO could be built & spread that excess 3 Million gallons on these proposed EC Farm fields into the Buffalo River watershed. This action would go directly against the intent of the moratorium.