



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.2 (BUFF)

August 5, 2015

Ms. Becky Keogh, Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317
(501) 682-0744

Dear Director Keogh:

This letter is to provide official comment on the proposed modification of the NPDES Permit (ARG590001) for C&H Hog Farm, Inc. to install synthetic liners under Waste Storage Ponds 1 and 2, and to install a cover and methane gas flare over Waste Storage Pond 1 (WSP 1).

The National Park Service generally supports any activity that will reduce the risk of water and air pollution reaching Big Creek and the Buffalo River. From the design drawings, it appears the synthetic liners have the potential to eliminate pollution of the karst aquifer deriving from seepage through the clay liners. We believe a two layer liner with leak detection technology would improve the ability to protect the waters of the National River. The methane flare system should dramatically reduce the noxious odors emitted from WSP 1, which potentially have a negative impact on the air quality of the Buffalo River, particularly during those periods when inversion layers trap odors and other pollutants and disperse them down gradient.

We are very concerned about this facility and others, in addition to non-point source pollution of the tributaries to the Buffalo River. We have not seen an Antidegradation Review, as may be required under 40 CFR 131.12(a)(2) for this facility. We respectfully request information regarding the Antidegradation Review for this facility so we may understand if it meets the requirements set forth in the federal regulations implementing the Clean Water Act.

Sincerely,

Kevin G. Cheri
Superintendent
Buffalo National River

Cc: EPA Region 6 Administrator

From: [McWilliams, Katherine](#)
To: [Deardoff, Amy](#)
Subject: FW: Comment Letter
Date: Friday, August 07, 2015 3:00:21 PM
Attachments: [Buffalo National River - C&H Comment Letter 20150805.pdf](#)

From: Shafii, Mo
Sent: Friday, August 07, 2015 2:50 PM
To: McWilliams, Katherine; Bailey, John; Solaimanian, Jamal
Subject: FW: Comment Letter

From: Lowry, Patricia
Sent: Friday, August 07, 2015 2:17 PM
To: Benefield, Ryan; Carpenter, Ellen; Shafii, Mo
Subject: Comment Letter