

**From:** Duane Woltjen [mailto:ozarktraveler1@att.net]

**Sent:** Wednesday, May 14, 2014 4:50 PM

**To:** Reg-Comment

**Subject:** Ban hog farm in Buffalo watershed

Arkansas Department of Environmental Quality

5301 Northshore Drive

Little Rock, AR 72118

Attn: Mr. D. Szenher

May 14, 2014

Re: Rules regarding hogs in the Buffalo River watershed

To whom it may concern:

While no one seems to have a document record of the fact, soon after the establishment of Buffalo National River, it was recognized that hogs had the potential to desecrate Buffalo National River and spoil the tremendous opportunity BNR afforded Arkansas and the area people. Considering this knowledge being so common throughout rural America while not being taught in formal education institutions, and Arkansas being no exception, it is not surprising that Arkansas quickly acted to ban hog farms in the watershed.

What is astonishing, however, is this hog farm ban was allowed to fade into non-existence as Arkansas's environmental responsibility became the charge of the Arkansas Department of Environmental Quality under the auspices of Arkansas Pollution Control and Ecology Commission.

As a result not only do small hog farms populate the watershed, but a huge sow-piglet Concentrated Animal Feeding Operation is at this moment perched on the west bank of Big Creek some six miles upstream from Carver. Superficial effort to take water samples from wells, springs and surface flow has already revealed tremendous e. coli pollution events in this watershed of the Buffalo which comprises 16% of the entire Buffalo watershed, and in the river itself. Furthermore, dye tracing has revealed direct subsurface water flow from manure application sites into the Buffalo through springs and seeps, a fact not unexpected because the fact that the Boone Formation is karst is amply disclosed on geological maps available from the U.S. Geological Survey, and many caves are present in the area.

It is also no secret to Arkansawyers that the economic engine the BNR provides is at risk and will perish if hogs manure is put on the fields. When hog manure is put on fields it is quickly noticed by picky tourists, maybe because it smells to high heaven and is nauseating to some of them. Even if not a single molecule of nitrogen or phosphorous goes any where other than into the hay crop plants themselves and every e-coli dies where lands, tourists don't believe it because they get around to other states like North Carolina and Iowa and Illinois and north Missouri and a lot of other places that have been messed on by hogs.

You can count on this—If tourists don't like it, they won't come. Tourist industry good bye-- along with about \$30 million dollars a year and more than 500 jobs. Some say more.

I read the application this first big CAFO submitted to ADEQ from beginning to end, and I couldn't believe my eyes. Just one little paragraph was all it said about geology! The consultant that wrote that thing had no idea what the geology is where this farm is, and ADEQ approved the application. That is like not knowing which end the shot comes out of a cannon. ADEQ?

Then I read about the holding ponds and how they are lined with clay (adulterated with chert rock chunks) and that they are allowed to leak up to 5,000 gallons per day per acre; and then I calculated the area and figured it must be OK for more than 6,000 gallons a day to leak out of them because ADEQ approved the application. (if you get used to water in your well over a period of years, tolerating e.coli and cryptosporidium is more or less achievable, so the neighbors shouldn't complain for all that long.) ADEQ?

Then I noticed that the National Pollution Discharge Elimination System here relies on the idea that fields are tested across the top 4 inches for the presence of phosphorous. If there is less than some limit, more can be added by spreading more hog manure on the site. I was wondering if all the phosphorous applied ends up in the plant and top 4 inches, or if some could soak down beyond the roots and just sit there, or if it could dissolve and end up in the groundwater or get into springs and surface streams. I guess I should not worry since ADEQ allows more to be added if the top 4 inches is not up to the limit. Who cares what happens to the rest? Not ADEQ.

However, I asked Dr. Sharpley at a public meeting about that anyway as he is reputedly the author of this system. Turns out he is wondering about where these nutrients really go too, and according to his published reports he is working on it and will be for another 5 years if it gets funded. I bet ADEQ doesn't know either, but the EPA bought into this plan so they must surely know, but if the EPA doesn't know they can just ask Dr. Sharpley and tell all of us when he finds out.

By this paragraph in this letter, the point is clear. We had a hog ban because we were savvy. We got rid of the hog ban because we were no longer savvy.

We must wise up again, and **ban hogs from the Buffalo watershed forever NOW**. No ifs, ands, or buts.

Sincerely,

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