

2930 Little Red River Road
Marshall, AR 72650
June 26, 2014

Doug Szenher, ADEQ
Public Outreach and Assistance Division
5301 Northshore Drive
North Little Rock, AR 72118

Dear Mr. Szenher:

We are among the many people who are still incredulous that ADEQ permitted the C and H Hog CAFO in Mt. Judea in the first place and have made our objections known all along. However, it is in regard to the third-party rule making petition to ban new medium and large confined swine operations in the Buffalo National River watershed by amending APC & E Commission Regulations 5 and 6 that we are writing at the present time. We would like to address four major areas of concern: Geology, Water Quality, Economics and Public Health.

Geology: The karst topography of the region transports pollutants so rapidly and is not suited for waste ponds with leakage rates of up to 5,000 gallons per day per acre of surface area as allowed by current regulations for the application of **untreated** hog waste.

Water Quality: As I write the Ozark Plateau has been experiencing especially heavy spring rains. Leakage from waste holding ponds and run-off with infiltration into the karst sub-layer and flooding of the fields under conditions such as we have been experiencing this spring pose unacceptable threats to the water quality of the Buffalo. ^{we have} If such a catastrophe as occurred in North Carolina in 1995, we can kiss our beloved first National River goodbye.

Economics: A threat to the Buffalo National River is a direct threat to the many people employed in the tourism industry in several counties in the Ozark Plateau. Property values of land adjacent to large swine operations have seen precipitous drops in value.

Public Health: The odor from the CAFO has been an irritant to school children and staff at the school in Mt. Judea and neighbors. Emissions of ammonia, nitrous oxide and hydrogen sulfide gases are highly toxic, and methane is a potent greenhouse gas responsible for global warming. In addition, entrained fecal bacteria and other pathogens exhausted from the feeding houses are carried by winds to residences and the school. Water-borne pathogens such as *e. coli* and *cryptosporidium* from land application sites may pose risks for body contact of swimmers, fishers and boaters on the Buffalo.

While it remains appalling that the existing CAFO will not be affected by any proposed changes, we are at least hopeful that our concerns will be met and stricter regulations will be implemented to prevent the establishment of additional hog CAFOs. Please carefully consider our concerns and those of many others who love our great treasure, the Buffalo National River.

Sincerely,



Ruth Weinstein and Joe McShane