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Sent: Monday, June 16, 2014 2:30 PM
To: Reg-Comment
Subject: <no subject>

Dear ADEQ,

Large CAFOs have no place in an area that receives millions of visitors yearly to recreate in the clean, clear waters of one of the most beautiful areas of the world: the Buffalo National River. Please ban future CAFOs in the Buffalo River Watersheds and all other karst areas of the state.

Becky Gillette

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Something stinks at C&H hog farm

Becky Gillette
4/30/2014

It was standing-room only at the church on Elk Street last Tuesday, Earth Day, as a crowd listened to karst geologist Dr. John Van Brahana detail failures in the permit process that allowed a 6,500-head Confined Animal Feeding Operation (CAFO) swine facility to be located near the Big Creek tributary to the Buffalo National River (BNR).

Brahana started out the talk, CAFOs in Paradise, sponsored by the Buffalo River Watershed Alliance (BRWA) by admitting that he has a bias: "I love this area. I want to see it preserved. I love pork, but producing pork in a karst hydrogeologic area is horribly risky."

Because of their fast growth, pigs generate waste in much greater volume than humans. The amount of waste generated by C&H Hog Farms is equivalent to that produced by a city of 35,000. There is no wastewater treatment plant for the waste that smells so bad it can make people feel ill. The waste is stored in sewage lagoons that are legally allowed to have 5,000 gallons per day of seepage into the ground. That contamination is in addition to wastewater sprayed out on agricultural lands surrounding the facility.

Brahana said because the waste is distributed on top of fields in a karst area that is porous, it can easily contaminate groundwater supplies that then flow into surface waters like the Buffalo

River.

The National Park Service has already found elevated levels of fecal coliform – an indicator of animal waste pathogens – in Big Creek. Brahana said it would have been hard to select an area less suited to this type of waste disposal because of the high degree of groundwater and surface water interaction, with little opportunity for wastes to biodegrade safely.

What is at stake? Brahana said if the Buffalo National River becomes contaminated, it threatens a tourism industry worth \$44 million per year. What is the payoff? Only six jobs were created, compared to 610 jobs directly tied to the BNR.

Brahana said companies like Cargill, which is contracted to purchase the pork produced by C&H Hog Farm, typically look for low-income, rural areas like this when building CAFOs operations. That is because the problems are so well known because of the experiences with CAFOs in other states, like North Carolina where hog waste has killed millions of fish in the Neuse River and adversely affected tourism. No one wants to swim or fish in waters that may be unsafe because of exposure to organisms that cause disease.

Brahana, who has a contract to do water monitoring in areas near the hog factory, has personally experienced what it is like to breathe the air near a facility like this.

“The word gag is appropriate,” he said.

He listed the following failures of the permitting process.

- There was no public announcement of the project.
- The secretive nature of the project completely disregarded concerns of legitimate stakeholders such as the National Park Service and local tourism operations.
- The facility received what is known as a General Permit from the Arkansas Department of Environmental Quality (ADEQ). General Permits allow fast tracking of permit approvals, are scientifically inadequate, and strongly favor special interests.
- ADEQ did not adequately review the permit. The head of ADEQ didn't even know the permit had been issued until after the fact.

“The review was pitiful,” Brahana, a University of Arkansas professor *emeritus* who has also worked for the U.S. Geological Survey, said. “An environmental firm from South Dakota came up with the waste management plan which is completely inadequate in a karst area like this. The owner says they were just following the rules, but the rules are inadequate to protect the environment. Many people are greatly concerned. The information about this threat has spread much farther than Arkansas.”

One flaw is that there was no background check of the water quality in the area. So if elevated nutrients start impacting local bodies of water, C&H can try to point the finger elsewhere saying that it is coming from cattle or from wild animals. The hog factory has only been in operation about a year, and wastes build up as the soils used to dispose of the waste become saturated.

Brahana suspects the facility has already discharged waste into Big Creek; there is no reason to

believe that the clay liner of the sewage lagoons is watertight. The pressure of the water pushes down through the clay, and then the waste can leach into underground rivers. Wastewater is sprayed onto fields, which adds contamination.

“The fecal coliform found after a recent storm indicates dangerous substances are being discharged into the water,” Brahana said. “They are already close to the limit of the system’s ability to handle waste.”

Brahana said companies like Cargill, which did \$138 billion in business worldwide in 2013, could afford to treat wastewater from contracted facilities such as C&H Hog Farms. “Waste can be treated economically and companies still profit,” he said.

Evidence of harm from other CAFOs in the country include miscarriages in women whose wells were contaminated by hog waste, and dairy cows aborting after drinking contaminated water.

Despite the potential downside to the project, Brahana said he has no confidence that the ADEQ is on the side of the people who want to protect the BNR. “ADEQ granted the permit under the radar,” he said.

Brahana said the facility is located far too close to the Mt. Judea public school and that Cargill officials showing up to give the students presents at Christmas doesn’t make up for the potential health problems the children face from the facility.

The American Public Health Association has called for a nationwide moratorium on CAFOs. The Pew Commission on Industrial Farm Animal Production (IFAP) states, “the current industrial farm animal production system often poses unacceptable risks to public health, the environment and the welfare of the animals themselves.”

ADEQ has granted the facility a five-year permit. And while a lawsuit against the public financing of the operation is underway, people who want to protect their treasured BNR from the hog operation face an uphill battle.

“Right now it doesn’t look promising,” he said.

Brahana makes the following proposal for how to go forward with this issue:

1. Include all stakeholders at the table.
2. Demand openness.
3. Verify and document all facts and aspects of the problem.
4. If there is disinformation or lies, they should be confronted.
5. Be respectful, but firm.
6. Use a holistic approach to the problem.
7. Reframe the discussion to allow reasonable alternatives.
8. Operate by the Golden Rule.