

December 8, 2015

Ms. Becky Keogh
Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

**VIA FIRST CLASS MAIL
AND ELECTRONIC DELIVERY**

Mr. Ron Curry
Administrator, EPA South Central Region
US EPA Region 6
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733
Phone: 214.665.7271

RE: C&H Hog Farm Plasma Arc Pyrolysis

Dear Ms. Keogh and Mr. Curry,

On October 10, 2014, the Buffalo River Coalition wrote to you and asked for immediate attention by the Arkansas Department of Environmental Quality (ADEQ) and the Environmental Protection Agency (EPA) to prohibit installation and operation of an experimental swine waste disposal system in the Buffalo River Watershed at C & H Hog Farm in Newton County, Arkansas. Our letter outlined specific concerns in that regard. Please see attachment.

We would like to reiterate our concerns that the state's failure to ensure adequate regulation and permitting for emissions related to the plasma arc pyrolysis system at C & H Hog Farm has the potential to result in adverse impacts to the health and well-being of the people and protected places in the region.

Additionally, it has come to our attention that on October 9, 2015 Plasma Energy Group (PEG) conducted a pilot test of its plasma arc pyrolysis unit at Sandy River Farm in Morrilton. On October 16, 2015, PEG moved its unit to C & H Hog Farm for operation.

To our knowledge, no data resulting from these pilot tests at either Sandy River or C&H Hog Farm have been submitted to ADEQ for risk assessment. We request that ADEQ and EPA ask PEG to supply both agencies with all information and findings related to these pilot tests as such findings may have import and implications related to the C&H Hog Facility in Arkansas. Where such information is obtained we urge EPA and ADEQ to assess the implications of such findings on the facility at issue here.

We respectfully request EPA and ADEQ's immediate attention and welcome engaging directly with the Department.

Sincerely,

Gordon Watkins
Buffalo River Watershed Alliance
gwatkins@ritternet.com

Alan Nye
Ozark Society
osacnye@gmail.org

Emily Jones
National Park Conservation Association
ejones@npca.org

Bob Allen
Arkansas Canoe Club
bob@ozarker.org

cc:
Governor Asa Hutchinson