

Arkansas Department of Environmental Quality  
Office of Water Quality  
5301 Northshore Dr.  
North Little Rock, AR 72118-5317

October 16, 2018

Dear Arkansas Department of Environmental Quality,

Thank you for the opportunity to comment on the denial of the Regulation 5 permit to C&H Hog Farms. I support ADEQ's "Statement of Basis" in the denial of this permit. I would like to provide additional supporting information to the "statement of basis".

"Under Reg. 2.509 Nutrients

- (A) Materials stimulating algal growth shall not be present in concentrations sufficient to cause objectionable algal densities or other nuisance aquatic vegetation or otherwise impair any designated use of the waterbody. Impairment of a waterbody from excess nutrients is dependent on the natural waterbody characteristics such as stream flow, residence time, stream slope, substrate type, canopy, riparian vegetation, primary use of waterbody, season of the year and ecoregion water chemistry."

During the past three years, the Buffalo National River has experienced significant algal blooms primarily downstream of the confluence of the Big Creek at Carver on the Buffalo. I have videotaped these large blooms and posted them on the following You Tube URLs:

<https://www.youtube.com/watch?v=nSwFXzCBXr0&t=45s>

<https://www.youtube.com/watch?v=sDf02aDFTvI>

These videos document "objectionable algal densities and other nuisance aquatic vegetation" that should be incorporated into the current "statement of basis" and future ADEQ 303(d) assessments. The videos identify that the Buffalo National River is not meeting the designated use and river impairment is likely due to nutrient contributions from C&H Hog Farms. From 2013-2017, the C&H Hog Farms annual reports noted that almost 14 million gallons of hog waste was deposited in the Big Creek valley. No other source of nutrients in the Buffalo River watershed comes close to the amount of nutrients produced by C&H Hog Farms.

In sum, C&H Hog Farms Regulation 6 permit should never have been approved by ADEQ in 2012. Fortunately, ADEQ has recently analyzed much of the scientific information in denying C&H Hog Farms Regulation 5 permit. Medium and large hog CAFO operations are not sustainable nor compatible in the Buffalo River watershed due to the karst geology and the designated recreational use and Extraordinary Resource Waters status.

Please continue on this path of examining the peer reviewed and credible science by denying any current and future permits for C&H Hog Farms and EC Campbell Farms. Please close this operation immediately. **It is unacceptable that C&H Hog Farms has been allowed to continue operating under an almost two-year-old expired Regulation 6 permit. The science is in** and this operation is destroying the Buffalo National River, American's first national river. Can't Arkansas do a better job to preserve its natural environment for the health of the river, its people, and its tourism revenue?

Sincerely,

Teresa A. Turk  
1408 W Cleveland St.  
Fayetteville, AR 72701  
206.713.2265