



United States Department of the Interior  
NATIONAL PARK SERVICE

Buffalo National River  
402 N. Walnut, Suite 136  
Harrison, AR 72601

IN REPLY REFER TO:  
I.A.I (BUFF)

July 29, 2016

Ms. Patricia Goff, Commission Secretary  
Arkansas Department of Environmental Quality  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

RE: Request for Appeal Hearing  
Permit number 3540-WR-7  
AFIN 51-00020

Dear Ms. Goff:

The National Park Service (NPS) submitted comments dated April 8, 2016 regarding the above-referenced permit modification for EC Farms. On June 29, 2016, Arkansas Department of Environmental Quality (ADEQ) approved the permit modification despite significant public opposition and ongoing controversy surrounding C&H Hog Farms and EC Farms. We continue to be concerned that approval of this modification would serve to exacerbate the potential for damage to the Buffalo River, the Little Buffalo River, and Big Creek.

To reiterate our earlier comments, we feel that permitting EC farms to spread manure generated by the C&H Hog Farms is premature and has failed to adequately take into account several significant factors. This is a highly controversial subject potentially affecting both area residents and more than one million visitors to Buffalo National River. Many of these local residents own or are employed by businesses that rely on visitation to support their livelihoods.

In response to many public comments opposing the permit modification, ADEQ responded that this permit was simply a modification of a previously issued permit, and therefore was approved. We continue to be concerned that the permit itself should be reviewed, given that the area is underlain with karst terrain and the potential for significant affects to the watershed remain. Due consideration of real and potential impacts must be made in light of ongoing discoveries and interpretations of hydrogeological data suggesting waste conductivity in the underlying karst system beneath many of the proposed spreading fields. Finally, we believe that this action constitutes a modification in the operation of C&H Hog Farm with the potential to introduce more waste into an already stressed ecosystem.

Please refer to our earlier correspondence dated September 18, 2015 and April 8, 2016 for a more detailed assessment of the proposed permitting. We respectfully request a hearing by the Commission on the merits of the permit modification.

Sincerely,

  
Kevin G. Cheri  
Superintendent