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C & H Hog Farms, Inc.: National Park Service Request for Arkansas Pollution Control & Ecology Commission Review of Permit Modification

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The United States Department of Interior National Park Service ("Park Service") filed a July 29th appeal before the Arkansas Pollution Control & Ecology Commission ("Commission") of a permit modification related to C & H Hog Farms, Inc. ("C & H").

C & H operates a concentrated animal feeding operation in the Buffalo River Watershed pursuant to a National Pollution Discharge Elimination System General Permit.

The Park Service Appeal addresses a permit modification request. The appeal, in letter form, is authored by Kevin G. Cheri. Mr. Cheri is Park Service Superintendent of the Buffalo National River.

Mr. Cheri initially states in the appeal that:

We continue to be concerned that approval of this modification would serve to exacerbate the potential damage to the Buffalo River, the Little Buffalo River, and Big Creek.

He references previously filed Park Service comments regarding a possible permit modification for EC Farms and states in part:

... 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.

The National Park Service states what it characterizes as continuing concern that the "permit itself" should be reviewed "given that the areas underlain with karst terrain and the potential for significant affects to the watershed remain". Also referenced are "due consideration" of real and potential impacts citing discoveries/interpretations of hydrogeological data suggesting waste conductivity in the underlying karst system beneath many of the proposed spreading fields. The Park Service contends that such action constitutes modification in the operation of C & H with the potential to introduce more waste into an "already stressed ecosystem".

The letter concludes by requesting a hearing by the Commission on the merits of the permit modification.

[A copy of the appeal letter can be downloaded here.](#)

