

From: [S Hodge](#)
To: [Water Draft Permit Comment](#)
Subject: Public comment C&H facility permits
Date: Saturday, April 01, 2017 1:40:54 PM

My concerns about the permitting of the C&H facility for large-scale sow farrowing include sampling protocols of the millions of gallons of waste.

I have seen some discussion of “Monitoring and Reporting Requirements” in part 6 of the fact sheet.

https://www.adeq.state.ar.us/water/permits/npdes/nonstormwater/pdfs/arg590000/fact_sheet.pdf

While the parameters are listed in the ARG590001 permit, I cannot find details about annual, thirty-day, or single day limits that are more in line with the EPA NPDES guidelines. Is there an NPDES Form 2C available for this Newton County facility?

Apparently this comes into effect when there is a discharge to the receiving waters in the stream segment whether unplanned or not. While I realize that a CAFO is not the same as municipal wastewater treatment plant, I would like the monitoring requirements to be changed to report once a month, so that in the event of a massive discharge into state waters, a biological profile would help with the development and execution of an emergency environmental remediation plan.

I am also concerned about the transportation of wastes to be applied to one of a dozen or more sites listed in the permit at hand. Arkansas has obviously experienced the negative consequences of spills of petrochemicals through leaks in the pipelines – Mayflower spill springs to mind. What about the accidental discharge of wastes by trucks, pipelines, or other infrastructure or equipment to direct the CAFO waste to land? Over what routes will the waste be transported? Will it be conveyed directly or indirectly over environmentally sensitive waters (ESW) or naturally scenic waters (NSW) to get to the receiving lands comprising 630 acres?

What are the reporting, monitoring, and compliance controls for the disposal sites? Are the results from sampling and monitoring going to be reported separately or composited?

I think there needs to be more input on the geological characteristics of the area: karst.

“Common geological characteristics of karst regions that influence human use of its land and water resources include ground subsidence, sinkhole collapse, groundwater contamination, and unpredictable water supply.” as noted in <http://karstwaters.org/educational-resources/what-is-karst-and-why-is-it-important/> retrieved 1-Apr-2017 12:15 pm EST.

While I understand that clay liners will be replaced with synthetic ones at the site for shielding groundwater from the lagoons, what protection on the land sites will be required to prevent the contamination of underground aquifers in this region given its location in the karst region? If the environmental engineering is correct, then millions of gallons of waste can be spread over the lands, but what is the environmental impact upon the fields if we discount agricultural run off from the fields?

Given that the geographically dispersed lands are covered as if it were one site for the permit,

what is the effect if one of the disposal sites goes out of compliance? How many have to go out of compliance before a permit is stopped or withdrawn?

Steve Hodge

email: zinc.losangeles@gmail.com