

## Wilson, Tabatha

---

**From:** alice andrews <alice209ok@yahoo.com>  
**Sent:** Wednesday, August 05, 2015 1:36 PM  
**To:** Water Draft Permit Comments  
**Cc:** Keogh, Becky; Benefield, Ryan  
**Subject:** C&H request to modify General Permit ARG590000

The following concerns merit a public hearing. ADEQ should provide one prior to a decision on the request to modify CAFO General Permit, ARG590000. Therefore I am requesting a public hearing for information regarding this permit.

Concerns:

1. How will it be verified that all the hog waste sludge has been removed prior to installing pond liners?
2. If all the sludge is not removed prior to installing the liners, methane gas can build up beneath the liners and cause the liner to “float” up or possibly rupture.
3. How will the hog waste be removed? If removal is incomplete, there is risk that the original clay liner could be damaged or disturbed causing the current leakage of waste to accelerate.
4. Is there any precedent in Arkansas for installing pond liners after clay liners have been receiving waste for about two years?
5. What are the risks of toxic material left in the air when methane is flared? My understanding is that, normally, only CO<sub>2</sub>, water and possibly some sulfates would be expelled. How much sulfate? Is this a factor? President Obama's new clean air initiatives, makes it currently unknown how that will impact methane flaring of hog waste.
6. Considering all the unknowns, what is the success rate at other hog farms of this size in Arkansas and other states?

I will appreciate an open public hearing to discuss these issues. Thank you for the opportunity to comment.

Alice B. Andrews  
Conservation Chair  
The Ozark Society