

From: [alice andrews](#)
To: [Water Draft Permit Comments](#)
Subject: Additional comments C&H request to modify General Permit ARG590000
Date: Friday, August 07, 2015 4:11:52 PM

I submitted comments earlier this week. After discussing my concerns with a professional engineer, I wish to include and expand my previous comments:

1) As stated previously, any waste left in the clay could cause problems with the buildup of methane or hydrogen sulfide gas under the liner. C&H should be required to give a plan for removing the sludge and demonstrating that residual sludge is not left in the clay soil. A professional engineer or other environmental professional should be required to certify the removal of the contamination.

2) With the installation of a synthetic liner over a clay liner, a common problem that has resulted in other installations is the buildup of water between the two impermeable barriers. This has been a particular problem in installations in Arkansas where the annual rainfall typically exceeds 50 inches per year. The proposed construction plan provides several pathways for water to encroach between the liners (ie pipe penetrations and concrete structures). Encroachment could also occur if the clay liner is breached at higher levels of the ponds. The encroaching water will become trapped and reduce the effective storage volume and could stress the liner to a point of failure. All such pathways should be provided with water stops constructed with a high quality clay material.

3) The Plans do not provide any specifications or procedures for installing the liners. Given the highly sensitive nature of this project, the Water Division should require full time inspection of the liner and the pressure testing of the completed liner installation. The Solid Waste Division of ADEQ requires a stringent set of standards before the acceptance of any synthetic liner for operation.

4) The NOI states that the Nutrient Plan was modified in May 2015. The changes to the Nutrient Plan should be included for public comment.