Public Comment Registration Card #4

Date 9/29/15

Verbal Comment: [ ] Written Comment: [ ]
Speaker #: [ ]
(Attached or back of card)

Hearing Location: Jasper High School - Northwest

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My name is Alice Andrews, Little Rock. I have about four comments that have been of concern. Since this is such a delicate operation and has to be done exactly right in order for it to work, I have had the pleasure and privilege of visiting with a professional engineer who knows liners in Arkansas. Any waste left in the clay can cause problems with the buildup of methane and hydrogen sulfide gas under the liner. For example, it cause failure of the liner if the liner floats up or ruptures. I believe that C&H should be required to give a plan for removing the sludge and demonstrating that residual sludge is not left in the clay. A professional engineer should be required to certify the removal of the contamination. And it would not be a bad idea for the sludge to be transported out of the Buffalo River Watershed. A second point is that a very sensitive leak detection methodology should be employed. They’re readily available. There’s one that I know of called an electrode system methodology where by an array of electrodes is placed above the pond liner, up on top, and a larger array is placed underneath the pond liner that can detect a leak and pinpoint exactly where it is, if it needs repair. It has some sort of, something similar to a GPS component that can pinpoint the leak. I have been told that there will not be that kind of leak detection system in place. I don’t know what leak detection there will be, but I believe that it’s critical. With the installation of a synthetic liner over clay, 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 that would be like pipe penetrations and concrete structures. Encroachment could also occur if the clay liner is breached at higher levels of the ponds. The encroaching water becomes trapped and reduces the effective storage volume and it 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. The plans further do not 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 pressure testing of the completed liner installation.
Public Hearing provided by ADEQ

Pond liner hearing advisory re installation of pond liners, pond cover and methane flare at C & H Hog Farm

Jasper, Arkansas, September 29, 2015

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. For example, the liner could float up or rupture. 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. The sludge should be transported out of the Buffalo River Watershed.

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 (i.e. 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 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. Changes to the Nutrient Plan should be included for public comment.

Thank you for the opportunity to comment.

Alice B. Andrews
Conservation Chair
The Ozark Society