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Verbal Comment Written Comment
Speaker # _____ (Attached or back of card)

Hearing Location Jasper AR

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Charles J. Bitting
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September 29, 2015

Public Comments of Charles J. Bitting regarding modification of Permit ARG590001 to install polyethylene liners on Waste Storage Ponds 1 and 2 and a polyethylene cover on Waste Storage Pond 1.

Dear ADEQ staff, I would like to take a few minutes to discuss my opposition to the proposed pond liners.

1. I think the liners are an admission that the ponds are leaking, all that valuable "organic fertilizer" is going into the ground.
2. The Waste Storage Ponds are not properly designed for synthetic liner installation. Flat bottom ponds cause bubbles to form when the liner starts to leak, and the liners will leak at some point.
3. There is no information on whether or not the waste at the bottom of the ponds will be removed, and how it will be disposed of once it is removed.
4. There is no information about "following the black dirt" into the ground if the clay liners are indeed leaking as many of us suspect. This is common practice when remediating sinkholes.
5. There is no indication that an ADEQ compliance engineer will be there to document the pond draw down, sludge removal, and liner installation.
6. There is no discussion of leak detection technology, even though this is a fairly standard practice with synthetic lined lagoons. Since you are dealing with liquid waste which could very easily flow directly into America's first National River, you should require buying a Cadillac not an Edsel.
7. There is no discussion of using a double liner to capture any liquid lost when the inner liner is breached, allowing the leakage to be pumped off.
8. The liners and covers may reduce the stench coming off the ponds, but they will have no impact on the hellish odors produced by spreading the waste on the fields. The ventilation of the barns and the spreading of the waste on the fields create more objectionable odors than the open air Waste Storage Ponds.
9. This project will do very little to reduce the negative health impacts to area residents from the Volatile Organic Compounds (VOCs) and other pollutants released during waste spreading.
10. This project will do very little to reduce neighbors' property de-valuation as a result of the odors from waste spreading.
11. I think this whole thing is an effort to keep the environmental groups and those supporting tourism in the Buffalo River watershed off balance. I remember watching

Mohammed Ali use this tactic to great effect on many opponents. I remember thinking "Why is he covering up, why won't he fight?" That is exactly what appears to be happening here tonight.

12. Finally, I do not think ADEQ has done its job. You have a duty to protect the air and water quality of Arkansas for all residents. Your agency seems too keen to side with large polluting industries, at the expense of the rest of the citizens of the State.

For all of these reasons and several more which I will not belabor, I feel the modification should be denied.