

From: [Fay Knox](#)
To: [Water Draft Permit Comments](#)
Subject: Comments to ADEQ R e: ARG590001 AFIN 51 - 00164
Date: Thursday, August 06, 2015 7:58:50 PM

To whom it may concern

Consider this as my response to C&H Hog Farm modification request to install pond liners, cover and flare on waste ponds #1 and #2. C&H hog farm lagoons are possibly leaking and impacting groundwater. C&H and Cargill wishes to retrofit the lagoons with technology that should of been installed at the time of construction.

These and future modifications should be denied because of the following reasons:

- 1) Data from the Big Creek Research and Extension Team strongly suggests that pond leakage is occurring.
- 2) There has been numerous errors, inaccuracies and missing data contained in the C&H NMP which need to be corrected.
- 3) An air permit needs to be issued to monitor and regulate discharge as the gas flare may impact air quality, and have potential health impacts in the Mt. Judea vicinity.
- 4) Sludge removal must be done before liners can be installed disturbing the existing clay liner. Solids have infiltrated the clay layer, and likely the underlying soil and groundwater. Disturbing the clay layer may cause embedded waste to further seep into groundwater. Monitoring for groundwater contamination that may result due to construction and installation of the liners needs to be done.
- 5) Some residual of the swine waste that has permeated the clay liner will remain after sludge is removed. The clay contains embedded residual organic waste and when the membrane liners are installed decomposition can produce methane and other gasses beneath the membrane liner which can become displaced and float to the surface of the pond. Seam failure, punctures, mechanical damage, etc have caused membrane liners to fail and leak. ADEQ should require leak detection technology.

Respectfully

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