

PO Box 61
Mountain Home, Arkansas 72654



Friday, August 7, 2015

Email comments to : Water-Draft-Permit-Comment@adeq.state.ar.us

Re: NPDES Permit # ARG590001-AFIN 51—0-164 – C & H Hog Farms

Subject: Public Hearing Request for C&H Pond Liner Modification

The Board of Directors of Friends of the North Fork and White Rivers requests that a public hearing be held in conjunction with the current public comment period regarding the permit modification requested by C & H Hog Farms, NPDES Permit Number ARG590001- AFIN 51-00164, for the installation of pond liners, cover and flare.

Areas of Concern

1. Liquid and solid waste must be removed from the ponds before liners can be installed. Sludge removal will inevitably disturb the existing clay liner which may cause embedded waste to further seep through the clay and into the ground and groundwater at an accelerated rate.
2. Swine waste has permeated the clay liner and some residual will remain after surface sludge is removed. When the liners are installed over the clay containing embedded residual organic waste, decomposition may produce methane and other gasses.
3. Seam failure, punctures, mechanical damage, etc. have caused membrane liners to fail and leak. These leaks may not be catastrophic but may occur slowly and go unnoticed until groundwater is negatively affected.
4. The gas flare may impact air quality at the nearby Mt Judea school, town and nearby residences. The public should be informed of what the components of this discharge will be and what the potential health impacts may be.

Thank you for considering these comments and our request for a hearing on the permit.

Sincerely,

Sam Cooke

Sam Cooke, President
Friends of the North Fork and White Rivers

Cc: Board members – Friends of the Rivers

From: [Jane Darr](#)
To: [Water Draft Permit Comments](#)
Cc: friendsworking@googlegroups.com
Subject: [BULK] C&H Modification Request : ARG590001 AFIN 51-00164
Date: Friday, August 07, 2015 3:03:07 PM
Attachments: [FriendsCommentsBRWAPondLiners8.7.docx](#)

Attention ADEQ professionals – please find attached (and below) formal comments submitted by the Board of Friends of the North Fork and White Rivers concerning the C & H Modification Request.

*PO Box 61
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Friends of the North Fork and White Rivers is an Arkansas 501(c)(3) non-profit organization devoted to creating an ongoing dialogue where individuals, groups, and government agencies can work together to conserve, restore and enhance these beautiful rivers.