

## Wilson, Tabatha

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**From:** Ginny Masullo <masullo.ginny1@gmail.com>  
**Sent:** Friday, July 24, 2015 10:53 AM  
**To:** Water Draft Permit Comments  
**Subject:** Proposed Modification of C& H Hog pond liners

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. That clay is now permeated with solids and disturbing it will likely cause waste to seep through the clay and into the ground.
2. When Big Creek Research Extension Team built the monitoring trench they initially detected very high E. coli levels, which they attributed to soil disturbance during construction. It's safe to assume the same will occur, but at a much larger scale, when the clay liner is disturbed.
3. What measures are being taken to minimize, monitor and mitigate the potential groundwater contamination that may result?)
4. If residual waste remains (and it inevitably will) and the liners are installed over it, it can produce gas during decomposition. This gas accumulation can cause the protective barrier and membrane liner to become displaced and float to the surface. What measures are being taken to prevent this from occurring and rectify the problem if and when it does occur?
5. Membrane liners can and do leak. Is ADEQ requiring C&H to install leak detection technology? IF NOT, WHY NOT?
6. CARGILL/ C&H have said repeatedly that, "the clay liners are state of the art and overbuilt." Now that Cargill wants to install membrane liners, is there reason to suspect that the clay liners are not adequate or not performing as expected?
7. Finally the fact remains glaringly that this facility should never have been permitted in this highly sensitive karst terrain and that is protected as a National River.
8. Comments From Ginny Masullo 1837 Ruppel Road , Fayetteville AR 72704.