

## Wilson, Tabatha

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**From:** Jeffrey Ingram <jmingram@ualr.edu>  
**Sent:** Friday, July 31, 2015 10:44 PM  
**To:** Water Draft Permit Comments  
**Subject:** C and H comment

Comments to ADEQ on ARG590001 AFIN 51-00164

C&H Hog Farm modification request to install pond liners, cover and flare on waste ponds #1 and #2.

A) 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 may cause waste to seep through the clay and into the ground and groundwater. When the Big Creek Research and Extension team (BCRET) built their monitoring trenches they initially detected very high E. coli levels, which they attributed to soil disturbance during construction. The same may occur, but on a much larger scale, when the clay liner is disturbed. Until proper measures are taken to eliminate and monitor for any potential groundwater contamination that may result due to construction and installation of the liners, this request should be denied.

B) 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 which contains residual organic waste, decomposition may produce methane and other gasses. This gas accumulation can cause the protective barrier and membrane liner to become displaced and float to the surface of the pond. Until proper measures are taken to prevent this from occurring this modification should be denied.

C) Seam failure, punctures, mechanical damage, etc can cause membrane liners to fail and leak. Leak detection technology is available to determine when such accidents occur. Until such technology is incorporated, this modification request should be denied.

E) The gas flare may impact air quality at the nearby Mt Judea school, town and nearby residences. Until an air permit is issued to monitor and regulate discharge this modification should be denied.

F) BRWA has previously described numerous errors and inaccuracies contained in the C&H NMP. To date, ADEQ has refused to require corrections. This and all future modifications should be denied until all errors and inaccuracies contained in the NMP are corrected.