

**From:** [Marti Olesen](#)  
**To:** [Water Draft Permit Comments](#)  
**Subject:** Comment on C&H Modification Request : ARG590001 AFIN 51-00164  
**Date:** Friday, August 07, 2015 1:52:09 PM

---

I am concerned that more dollars are being invested into a facility that requires relocation, not mitigation. Everyone is now aware that our Ozarks karst topography is unpredictable, cracked, full of conduits, springs and sinkholes that remain undetected until someone discovers Ecoli in their drinking water, or sewage algae in their favorite swimming hole or fishing spot.

If, as has been repeatedly stated, the original pond liners for the sewage ponds were built to the highest of regulation standards, and all rules were followed, why now add liners? If the chert laden clay liners were already up to par, this modification request does not appear to be a friendly nod to environmentalists by the CAFO operators, but more a recognition that concerned citizens have done their research and know something about karst that the original building facility planners from Nebraska (DeHaan, Grabs and Associates) hadn't considered. One size doesn't fit all when it comes to landforms. Karst topography is never suitable for waste disposal of any kind. It leaks and in all the wrong places. Tainted water can show up in a spring or river miles from its original source.

USDA experts at the recent water conference at the U of A brought up the problems with the phosphorus index and especially the fact that it can't be accurately measured without adding a topographical component. Even now the SWAT Topo instrument is being developed by Agri researchers to try to correct for this acute problem in measuring phosphorus pollution. If our measuring tools for particulates are unreliable, perhaps ADEQ needs to look at multiple factors such as algal blooms and macroinvertebrate indices when determining water quality.

Does a lone CAFO in prime karst adjacent to a significant tributary of the Buffalo National River need to be the site where experimentation and mitigation takes place? Couldn't a less sensitive site be identified for such a large scale and unwieldy case study for karst CAFO mitigations be carried out? For academic scientists doing agricultural research one place may be just as good as another, but for the people of Arkansas, the Ozark region, and our country, such an experimental "demonstration farm" is not appropriate for the BNR watershed.

If hundreds of thousands of public dollars, (mine and yours in the form of our state taxes) had not been allocated for monitoring this CAFO, would the U of A and Cargill/JBS be aiding and experimenting with untested pyrolysis processes, gas flare flumes creating an air quality problems and an eyesore in a rural landscape? Would a monitoring team be water quality testing on fields that have had no swine waste applied on them? Are there other instances of clay liners in karst being mechanically disturbed in order to insert the current "latest technology" in liners? Why weren't membrane liners used originally if the clay liners were not as effective? Throughout the agriculture field membrane liners have been commonplace and even required in other states for CAFOs. This mitigation modification request tells us that although the facility plan was "acceptable" for compliance with NPDES regulations, it is not acceptable for CAFOs in karst. Installing membrane liners after the fact, and dredging up layers of sludge increases the likelihood of punctures and mechanical mishaps on the site. This is purely experimentation with taxpayer money, not monitoring as most taxpayers were led to believe.

When the same team members are monitoring and mitigating at once, how can the ADEQ ascertain what is actually happening on the ground? Is ADEQ monitoring the monitoring team's thread of continuing experiments?

Instead of approving yet another mitigation modification for experimentation for industrial agriculture's benefit with taxpayer dollars, I am requesting ADEQ to reopen the permit and relocate this operation to a better location not situated the karst watershed of the BNR.

This is a plea on behalf of all those who love the Buffalo National River. We have a rare free flowing pristine river unequalled in beauty and water quality in Arkansas or the nation. ADEQ is responsible for assuring its environmental quality. I ask that this modification be denied and the facility be relocated.

Will you please respond to let me know you have received this comment?

Thank you,

Sincerely,

Marti Olesen