

From: [Teresa Turk](#)
To: [Water Draft Permit Comments](#)
Subject: C&H hog factory request for modification to install pond liners
Date: Friday, August 07, 2015 4:15:39 PM

Dear Arkansas Department of Environmental Quality,

I am writing to advocate denial of a permit modification to the C&H hog factory located near Mt. Judea, AR.

1. I am shocked that you are not going to have a public hearing for such a large modification to the permit. I ask you to provide an intelligent answer to why you are denying the right of Arkansans and other interested citizens from voicing their opinion in a public forum.
2. The existing pond "liners" are not liners at all but infilled by hog waste between the crevices of clay and chert particles. There is data available (BCRET) that strongly suggest these so called "state of the art liners" are leaking. These were never state of the art, these were the cheapest and most basic legal "liner" available to meet the permit criteria.
3. Retrofitting the existing "liner" may cause even more leakage than is presently occurring. I conducted a literature search and have not been able to locate a journal article or situation in which existing clay "liners" were retrofitted with a plastic liner after construction and had been filled with raw hog waste. I think it is important for you to be able find an analogous situation and evaluate the results. If there are no previous documented occurrences, then the state should take a risk averse approach and side with caution thus denying the permit modification request.
4. During my literature review, I came upon 2 significant articles noted below:

" Manure Raises New Stink"

<http://www.wsj.com/articles/SB10001424052748704266504575142224096848264>

Please read the link for more details. In this instance a dairy farmer had installed a plastic liner for his manure pond. The liner began to have bubbles in it. Eventually the bubbles were so large that they torn the liner away from the bottom of the pond and ballooned to the top. There is a picture of this in the articles. Plastic liners have many, many problems even when they are installed correctly during initial construction before animal waste is deposited. With retrofitting, the probability of having bacteria and any other organism that release gas is huge. The risk of liner failure in a retrofit scenario would appear to increase dramatically.

The other article is called "Cesspools of Shame" and it documents many, many failures of manure lagoons. For the complete article, please read the link below:

<https://www.nrdc.org/water/pollution/cesspools/cesspools.pdf>

The only undeniable way to prevent any further leakage or damage to Big Creek and the Buffalo River is to deny this permit modification and rescind the original permit. This hog factory is damaging our environment, our health, and our economy. Please shut this operation down now.

Teresa A. Turk

1408 W Cleveland St.

Fayetteville, AR 72701