

ADEQ MANAGEMENT PLAN—C&H FARMS INVESTIGATION

1. Introduction and Purpose

The Arkansas Department of Environmental Quality (ADEQ) has contracted with Harbor Environmental and Safety (Harbor) to conduct a single boring and sample collection at the C&H Hog Farms facility located near Mt. Judea, Arkansas. This investigation is in response to interpreted results from a 2015 electrical resistivity imaging (ERI) survey commissioned by the Big Creek Research and Extension Team (BCRET) that suggested possible vertical leakage from the waste storage ponds and possible fracturing within limestone bedrock below the site. Potential concerns raised by a citizens group regarding the ERI survey included the rapid transport of contaminants in groundwater through weathered limestone pathways and subsidence or collapse of the ponds due to karst terrain. The citizen’s group recommended a subsurface investigation prior to installation of synthetic liners within the ponds.

Given the concerns, this investigation is being conducted by ADEQ to evaluate the lithology/geology below the site and assess potential subsurface impact from the waste storage ponds. As part of this process, Harbor prepared the Drilling Study Work Plan (DSWP) to describe the methods and procedures to be utilized in the collection and analysis of soil, rock, and groundwater samples at the C&H Hog Farms facility.

This Management Plan identifies project stakeholders in this investigation, ADEQ roles and responsibilities during the duration of the field and reporting activities, identification of individuals within ADEQ and their role in the project, a schedule of activities, a communication plan, and a record-keeping plan. A description of Harbor’s tasks is also presented.

2. Project Stakeholders

Stakeholder	Primary Contact	Contact Number
ADEQ	Caleb Osborne	501.682.0744
Harbor Environmental	Thomas Huetter	501.663.8800
Buffalo River Watershed Alliance	Richard Mays	501.362.0055
Big Creek Research and Extension Team	Andrew Sharpley	479.575.5721
C&H Hog Farms	Jason Henson	870.434.5004

3. ADEQ General Roles and Responsibilities

ADEQ Personnel	Project Role
Becky Keogh	Director
Caleb Osborne	Associate Director Program Manager Landowner Coordination Investigation Report Review
Dr. Robert Blanz	Chief Technical Officer Landowner Coordination Technical Oversight Investigation Report Review
Tammie J. Hynum	Contract Administration Investigative Report Review
Kimberly O’Guinn	Media Liaison Communications Director
Charles Johnson	Project Manager Coordination with Consultant ADEQ Onsite Observation Investigation Report Review
Lessie Redican	ADEQ Lab Analysis Analytical QA/QC Coordination with Nix lab Investigation Report Review
Jason Bolenbaugh	Provide on-site team support as required Coordinate sample transport to ADEQ lab

4. Specific ADEQ Personnel Roles

Caleb Osborne

Caleb is responsible for the general oversight and program coordination. He will work with team members throughout the process to provide direction and review plans and reports developed during the project. He will be responsible for providing regular briefings to the ADEQ Director and will serve as the primary contact with the landowner.

Dr. Robert Blanz

Dr. Blanz will provide overall technical direction for the project, including coordination with the ADEQ site manager during the investigation. He will be responsible for briefing other ADEQ senior management on the progress of the project, as well as on any issues concerning the project. He will also coordinate with ADEQ personnel involved in other functions such as laboratory activities and interaction with the landowner.

Kimberly O'Guinn

She is responsible for all contact with media and other third party inquiries received during the performance of the investigation. She will prepare the Communications Plan, which is attached to this Management Plan. She will also maintain the project website and coordinate media statements.

Tammie J. Hynum

As Contracts Manager, she is responsible for reviewing the Scope of Work elements and discussing the expectations for each element with contractors attending the Scoping Meeting. Once the independent bids were received by the contractors, she participated in the team review of the bids (side-by-side comparison). She advised Executive Management on contract selection procedures and drafted acceptance and rejection letters.

Jason Bolenbaugh

Jason is responsible for coordinating the Compliance Branch staff during the drilling activity. Members of the Compliance Branch may assist the team by delivering time-sensitive samples to the ADEQ laboratory so that holding times will be met. Additionally, the Compliance Branch staff will provide onsite logistical support as required.

Lessie Redican

Lessie is responsible for the coordination of the preparation of all sampling containers for ADEQ and Ouachita Baptist University (OBU). She will receive and document samples delivered from the investigation by the Office of Water Quality (OWQ) Compliance personnel. She will also oversee the preparation of samples to be split with OBU, direct the laboratory analyses to be performed by the ADEQ lab, and verify the Quality Assurance/Quality Control (QA/QC) of analytical results.

Charles Johnson

Charles will serve as the ADEQ site project manager during all field activities. In that capacity, he will coordinate field activities with OWQ personnel to ensure that management is informed as to the progress of the investigation and discuss issues that might arise during the

investigation. He will also act as Site Safety Manager for ADEQ personnel onsite. He will be the primary contact between ADEQ, Harbor, and Harbor’s subcontractors during the field investigation.

5. Project Schedule

Project Activity	Days from Commencement of Field Activities
Commencement of field activities	0
Completion of field activities	5
Submittal of Drilling Study Report (DSR) to ADEQ	50
ADEQ submittal of any comments regarding DSR	60
Submittal of revised DSR	70

6. Communications Plan

To promote ADEQ’s goal of transparency, the communications team will take a proactive role in ensuring effective and timely communication during the drilling at C&H Hog Farms.

External Communications

Communications will be established with stakeholders through a dedicated website, news releases, and social media posts. The C&H Pond Integrity Evaluation website can be accessed from the main page of ADEQ’s website.

The website has been created for stakeholders to view work plans, reports, data, meeting agendas, presentations, visual media, and other related information in reference to the drilling project. Additionally, an email inbox has been established to receive third-party information. This inbox will be managed by the communications team. The communications team will route the third-party information internally before posting to the website.

The website will be updated twice daily. Stakeholders may register on the website to receive notices of postings.

Internal Communications

A common-network drive has been established to post information related to C&H Hog Farms drilling. A subsidiary folder will be used for information ready to post on the website. The communications team will use this folder to retrieve information to post to the website.

7. Onsite Project Meetings

While onsite activities are carried out, ADEQ staff will participate in the following planned meetings and briefings:

1. Pre-Project Briefing
2. Safety Briefing

3. Daily Morning and Afternoon Debriefings (Conference Calls)
4. Project Closing Meeting

8. Records Management Plan

All project files developed during the execution of this investigation will be maintained at <G:\Shared Folders\C&H Drilling Project Team\Project Documents>. Included in this directory will be:

1. ADEQ Project Management Files
2. Files from Harbor and its contractors
 - a. Field Data
 - b. Analytical Data and Validation Reports
 - c. Workplans and Investigative Reports
3. For those samples analyzed by ADEQ, Tech Services Lab will maintain chain of custody throughout the project, tracking sample receipt, extract preparation, and sample relinquishing to the next laboratory. Copies of all Tech Services laboratory data and related information will be consolidated into one folder for easier future access.
4. Stakeholder Comments and Feedback.

9. Environmental Consultant

Harbor has been selected to perform this investigation at the C&H Hog Farms. Harbor was tasked to prepare project workplans, engage appropriate subcontractors to perform specific tasks as part of the investigation, manage field operations during the investigation, and prepare final reports which will present information concerning the activities undertaken during the investigation. These activities will be coordinated with ADEQ personnel.

Specific tasks to be performed by Harbor or under Harbor's supervision include:

1. Workplan preparation
2. Subcontractor procurement
3. Pre-mobilization preparation
4. Oversight of Field Operations
 - a. Drilling and sampling of borehole
 - b. Collection of soil, bedrock, and groundwater samples, as appropriate
 - c. Document field activities, both with digital camera and with video
 - d. Prepare samples for transport to analytical lab
 - e. Geophysical Logging
 - f. Coordinate with Independent Geologist
 - g. Plug and Abandon boring
 - h. Manage Investigation-Derived Waste
5. Site Restoration
6. Coordination with Analytical Lab
7. Prepare Investigation Report
 - a. Summary of field activities
 - b. Presentation of analytical data, in tables as well as in lab data sheets
 - c. Summary of Findings