

BRWA Talking Points on C&H Conceptual Closure Plan

Read the Closure Plan:

https://www.adeg.state.ar.us/water/pdfs/mt_judea_cafo_ponds_closure_plan_20190927.pdf

Submit Comments:

<http://info.adeg.commentinput.com/?id=dV7hW>

Please share your comments with BRWA:

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We strongly support the proposal to transfer all liquids, sludge and solids removed from both waste storage ponds to an appropriate waste treatment facility outside of the Buffalo River watershed. We offer the following recommendations regarding monitoring.

BRWA Monitoring Recommendations

BRWA recommends that the Conceptual Closure Plan be revised to include the following testing and monitoring components:

- 1) Use grid soil sampling or soil borings after sludge and solids removal to measure nitrate and electrical conductivity to determine the extent of contaminant movement beneath the pond floors. The results will determine the extent of soil removal required and establish whether monitoring wells are needed.
- 2) Depending on soil test/boring results, install monitoring wells. Regardless of test results, continue monitoring the House Well, per BCRET protocols, and add the second house well as a second monitoring point. Wells should be tested both pre-closure and post-closure and should continue to be monitored for at least 3 years.
- 3) Continue monitoring at least the Big Creek Downstream station for phosphorus and dissolved oxygen and consider monitoring

for E. coli at both the Downstream and Upstream stations.
Continue stream monitoring for three years and reassess.