

October 10, 2014

Mr. Ryan Benefield, Interim Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Mr. Ron Curry
Administrator, EPA South Central Region
US EPA Region 6
1445 Ross Ave, Suite 1200
Dallas, TX 75202-2733
Phone: 214.665.7271

RE: C&H Farms Plasma Arc Pyrolysis

Dear Mr. Benefield and Mr. Curry,

The Buffalo River Coalition, consisting of The Ozark Society, The Buffalo River Watershed Alliance, Arkansas Canoe Club and National Parks Conservation Association, asks for immediate action by the Arkansas Department of Environmental Quality (ADEQ) and the United States Environmental Protection Agency (EPA) to prohibit installation and operation of an experimental swine waste disposal system in the Buffalo River Watershed at C & H Hog Farms, Inc. in Newton County, Arkansas, until such time that pilot testing is conducted and results thereof either confirm: (1) that emissions are *de minimis* and ADEQ determines that an air permit is not required or (2) emissions exceed a threshold triggering the need for an air permit and ADEQ moves forward with a requisite transparent public process to issue a required permit. Furthermore, the pilot testing must not be carried out at C & H Farms and must be of such a scale and conducted over a sufficient time period to determine the monitoring and control instrumentation that should be provided to insure the safety of the farm workers, residents, and school children in the area.

C & H Hog Farms, Inc. is located within the Buffalo River Watershed and near the Upper Buffalo Wilderness Area, a designated Class 1 area. It is also within 1 mile proximity of Mt. Judea School. It is incumbent upon ADEQ to protect the health and welfare of the people and natural resources of Arkansas. ADEQ may not turn a blind eye to projected emissions, as well as other possible safety hazards, from an experimental facility. By failing to ensure any and all requisite permits and associated emission rates and systems for monitoring compliance and reporting are finalized prior to the operation of an emitting facility, the agency is abdicating its clear duties.

On September 18, 2014, Plasma Energy Group (PEG) submitted a request for a pilot program to install and test a Plasma Arc Pyrolysis unit for mixed swine waste at C&H Farms. According to the submittal, the unit will process 10,750 gallons per day of liquid waste and 805 pounds per hour of solid wastes. However, where they got these capacity numbers is a mystery. They are equivalent to an annual waste production of approximately 4 million gallons and we know from the original C & H Hog Farms Notice of Intent that the waste production of the farm including rinse water and rain water is on the order of 2.1 million gallons.

On September 18, 2014, Robert Cross, on behalf of The Buffalo River Coalition, sent a letter to ADEQ (attachment 1) outlining initial technical concerns in PEG's Analysis. The letter conveys concern for pollutants generated by the plasma chamber including unknown amounts of pollutants and improper calculation of pollutants. In fact PEG states in their permit application that one of the purposes of the trial is to determine the actual emissions for permitting requirements. We assert that a trial of untested technology for processing swine waste onsite at C&H is completely inappropriate.

An email communication from Thomas Rheaume, Permit Branch Manager, Air Quality Division ADEQ, to Plasma Energy Group, on October 7, 2014 (attachment 2) makes clear that ADEQ has no intention of ensuring that necessary permit processes, permits or associated operational safeguards be in place to protect the health and welfare of Arkansas residents or natural resources.

We are concerned that the state's failure to ensure adequate regulation and permitting for emissions related to the Plasma Arc Pyrolysis system at C & H Hog Farms, Inc. has the potential to result in adverse impacts to the health and well-being of the people and protected places in the region. We request EPA and ADEQ's immediate attention and welcome engaging directly with the Department. We request the courtesy of a response from ADEQ by Oct 17, 2014. Email addresses are listed below

Sincerely

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Gov. Beebe
Supt. Kevin Cheri, Buffalo National River
Terrence Peck, Quachita and Ozark-St Francis National Forests
Judy Logan, Quachita National Forest, Air Quality Staff