Buffalo River Watershed Alliance Position Paper October 10, 2014

Plasma Pyrolysis - Lipstick On A Pig

When C & H Hog Farms initially came to the attention of the public, what raised the ire of many local folks, and now people across the state and even nationwide, was the way in which ADEQ allowed the C&H permit to slip through under the radar - no transparency, notice or opportunity for public comment.

As concerned citizens took it upon themselves to get a grasp on what was occurring we were told that this lagoon-and-spray field model was "state-of-the-art", when in fact it had been banned in NC because of its unacceptable environmental impact.

As public outcry grew louder, the U of A was charged by the Governor to monitor the operation for potential harm.

When meeting with citizens groups, Cargill representatives admitted they had made a mistake by allowing this facility to be placed in such a fragile environment, threatening a national treasure and in such close proximity to a school and town. They expressed regret at this oversight and vowed to make it right.

Now Cargill and C&H, with tacit approval from ADEQ, are repeating the same mistakes. Rather than addressing the root problem - the mistaken placement of this CAFO in the Buffalo River watershed atop karst topography - they are once again quietly and without transparency, notification or opportunity for public comment, attempting dubious, possibly dangerous, mitigative measures, once again dubbed "state-of-the-art". ADEQ is allowing these measures to be implemented without a permit of any kind.

In particular, plasma pyrolysis (essentially a high-tech incinerator) is an untested, unproven technology for processing liquid swine waste. It is being undertaken by a start-up company with no track record with this application. The plan for processing over 9,000 lbs/hour of liquid swine waste is based on data from 1995 for processing 100 lbs/hour of dry medical waste. Potential emissions from this operation are speculative at best and are unsupported by laboratory bench testing, modeling or field trials. Meanwhile, ADEQ simply looks the other way and allows this "trial" to proceed without a permit but with the understanding that the operators will self-monitor, allowing the wolf to guard the hog house. This is a glaring abdication of ADEQ's responsibility to protect the well-being of Arkansas citizens.

Plasma pyrolysis and other mitigative measures, including capturing and flaring gasses from the waste ponds, simply shift the environmental and health risk from the water to the air. At best, these measures are a temporary band-aid. At worst, they present a danger and long term health risk to the children and residents of Mt Judea, located a short distance downwind. They will not solve the root problem. C & H Hog Farms should never have been built where it sits and no amount of technological guick-fixes can make that right. The only real solution is closure or relocation.

This is yet another effort to put lipstick on a pig.