



**DIVISION OF
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

January 28, 2025

Elizabeth Mack, Senior Environmental Compliance Specialist
Department of Environmental Services
755 N. Franklin, Springfield MO 65802

Re: Change of Signatory Authority
Nabors Landfill, 1320 Landfill Road, Mountain Home, AR 72653
Wastewater Contribution Permit No. 593; AFIN: 03-00051

Dear Ms. Mack:

The Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ), respectfully requests to transfer the signatory authority in accordance with Wastewater Contribution Permit No. 593. The authority changes are noted below. Please amend your records accordingly.

The following signatory authority shall be removed:

Mr. Jarrod Zweifel, P.G., former associate director
Office of Land Resources

The following signatory authority shall be added:

Associate Director of the Office of Land Resources
currently filled by Mr. Bryan Leamons, P.E.

The following authorized representative shall be added:

Mr. Nicholas Jones, senior operations manager,
Office of Land Resources

The following authorized representative shall be added:

Mr. Charles Hurt, P.E., engineering operations manager,
Office of Land Resources

If you have any questions, please contact Clay McDaniel of my staff at 501-682-00836 or clay.mcdaniel@arkansas.gov.

Sincerely,

A handwritten signature in blue ink that reads "Bailey Taylor".

Bailey Taylor
Chief Administrator of Environment and DEQ Director
Arkansas Department of Energy & Environment

Nabors Landfill Discharge Monitoring Report Certification Statement

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

All samples and measurements taken are to the best of my knowledge representative of the permitted wastewater discharge.

All sampling, measurements, and analyses were conducted in accordance with guidelines prescribed in 40 CFR 136 and the Wastewater Contribution permit obtained from the City of Springfield, Missouri."

BWT
for

Bryan Leamons

Bryan Leamons

Signature (Legible)

Associate Director, Arkansas Energy and Environment – Office of Land Resources

Title

NABORS Landfill

Name of Facility

1/28/2025

Date

January 7, 2025

Sent via Certified Mail and Email to emack@springfieldmo.gov
Certified Mail No. 9489 0090 6186 0395 64

Ms. Elizabeth Mack
Pretreatment Inspector
City of Springfield
Department of Environmental Services
755 N. Franklin Avenue
Springfield, MO 65802

**Re: Semi-Annual Leachate Report
Second Half 2024
NABORS Landfill
Mountain Home, Arkansas
Wastewater Contribution Permit No. 593**

Dear Ms. Mack:

On behalf of the Arkansas Department of Energy and Environment's Division of Environmental Quality (DEQ), please find attached the results of leachate analysis for the Second Half 2024 reporting period for the referenced facility. A total of 678,050 gallons of leachate was generated during the six-month period.

The leachate generated at the North Arkansas Board of Regional Sanitation (NABORS) Landfill is transported to the City of Springfield, MO wastewater collection system under Wastewater Contribution Permit #593. A sample of the leachate plus a duplicate sample were collected on November 20, 2024, and submitted for laboratory analysis (report attached). None of the detected concentrations exceeded the permit requirements. Table 1 below summarizes the analytical methods and results of the analyses. The metals results were converted from micrograms per liter (µg/L) to milligrams per liter (mg/L) for comparison to the permit requirements.

Table 1 – Summary of Leachate Analytical Results – November 2024

Parameter	Analytical Method	Units	Permit Requirement	Leachate	Leachate Duplicate
Arsenic	EPA 200.8 Rev 5.4 (1994)	mg/L	0.51	0.0368	0.0367
Cadmium	EPA 200.8 Rev 5.4 (1994)	mg/L	0.13	< 0.00026	< 0.00026
Chromium	EPA 200.8 Rev 5.4 (1994)	mg/L	2.91	0.00898	0.00899
Copper	EPA 200.8 Rev 5.4 (1994)	mg/L	2.44	0.00132	0.00146
Lead	EPA 200.8 Rev 5.4 (1994)	mg/L	0.53	< 0.000416	< 0.000416

Table 1 – Summary of Leachate Analytical Results – November 2024 (Continued)

Parameter	Analytical Method	Units	Permit Requirement	Leachate	Leachate Duplicate
Mercury	SW7470A/EPA245.1,3.0 (1994)	mg/L	0.02	< 0.016	< 0.016
Nickel	EPA 200.8 Rev 5.4 (1994)	mg/L	5.79	0.127	0.125
Phosphorus	EPA 200.8 Rev 5.4 (1994)	mg/L	Monitoring Requirement Only	< 0.936	< 0.936
Zinc	EPA 200.8 Rev 5.4 (1994)	mg/L	6.54	< 0.0208	< 0.0208
Ammonia as N	SM 4500-NH3 B,D,C-2011	mg/L	Monitoring Requirement Only	308	300
Cyanide (total)	SM 4500-CN B,E-2011	mg/L	0.33	< 0.010	< 0.010
Flashpoint	SW 1010B, 2018	°C	<140°F	Did Not Flash	Did Not Flash
Oil and Grease	EPA 1664 Mod, Rev. B 2010	mg/L	100	< 5.15	< 5.32
pH	SM 4500-H+ B-2011	S.U.	5.0 (minimum) 12.5 (maximum)	7.11	7.08

Notes: S.U. – standard units; °C – degrees Celsius; mg/L – milligrams per liter; metals results converted from micrograms per liter to milligrams per liter for comparison to permit requirements.

Also attached is the signed Certification Statement. Let me know if you have any questions or need additional information. Please contact either of the undersigned at 501-663-8800 or via email.

Sincerely,



Thomas A. Huetter, P.G.
Senior Project Manager
thuetter@harborenv.com



Leslie Davis
Principal
ldavis@harborenv.com

cc: Bryan Leamons, P.E.
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Attachments: *Laboratory Analytical Report*
Certification Statement



8100 National Dr. - Little Rock, AR 72209
501-455-3233 Fax 501-455-6118

27 November 2024

Tom Huetter
Harbor Environmental & Safety
5800 Evergreen Dr.
Little Rock, AR 72205

Project: NABORS Landfill Leachate Sample(s)
Project Number: November 2024
SDG Number: 2411483

Enclosed are the results of analyses for samples received by the laboratory on 21-Nov-24 07:35. If you have any questions concerning this report, please feel free to contact me.

Sample Receipt Information:

Custody Seals	✓
Containers Correct	✓
COC/Labels Agree	✓
Received On Ice	✓
Temperature on Receipt	2.0°C

Sincerely,

A handwritten signature in blue ink that reads "Norma James". The signature is written in a cursive, flowing style.

Norma James
Technical Director

27 November 2024



Tom Huetter
Harbor Environmental & Safety
5800 Evergreen Dr.
Little Rock, AR 72205
Project: NABORS Landfill Leachate Sample(s)
Project Number: November 2024
Date Received: 21-Nov-24 07:35

CASE NARRATIVE

Sample Delivery Group – 2411483

One OR more of the qualifiers described below may appear in this report. Qualifiers in RED apply to this SDG (Sample Delivery Group).

pH QUALIFIERS:

<u>Qualifier</u>	<u>Description</u>
E2	Result qualified as it was received and analyzed outside of holding time. Analysis is considered a "Field" analysis.

FLASHPOINT QUALIFIER:

<u>Qualifier</u>	<u>Description</u>
DNF	Sample DID NOT FLASH at or below method required temperature of 100 degrees C or 212 degrees F.

27 November 2024

Tom Huetter
Harbor Environmental & Safety
5800 Evergreen Dr.
Little Rock, AR 72205
Project: NABORS Landfill Leachate Sample(s)

Project Number: November 2024

Date Received: 21-Nov-24 07:35



ANALYTICAL RESULTS

Lab Number: 2411483-01
Sample Name: Leachate
Date/Time Collected: 11/20/24 10:20
Sample Matrix: Leachate

<u>Total Metals</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Arsenic	ug/L	36.8		11/26/24 16:04	B411557	EPA 200.8, Rev. 5.4(1994)
Cadmium	ug/L	< 0.260		11/26/24 16:04	B411557	EPA 200.8, Rev. 5.4(1994)
Chromium	ug/L	8.98		11/26/24 16:04	B411557	EPA 200.8, Rev. 5.4(1994)
Copper	ug/L	1.32		11/26/24 16:04	B411557	EPA 200.8, Rev. 5.4(1994)
Lead	ug/L	< 0.416		11/26/24 16:04	B411557	EPA 200.8, Rev. 5.4(1994)
Mercury	ug/L	< 16.0		11/26/24 15:35	B411560	SW7470A/EPA245.1,3.0- 1994
Nickel	ug/L	127		11/26/24 16:04	B411557	EPA 200.8, Rev. 5.4(1994)
Phosphorus	mg/L	< 0.936		11/25/24 12:49	B411524	EPA 200.7, Rev 4.4 (1994)
Zinc	ug/L	< 20.8		11/26/24 16:04	B411557	EPA 200.8, Rev. 5.4(1994)
<u>Wet Chemistry</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Ammonia as N	mg/L	308		11/22/24 8:29	B411475	SM 4500-NH3 B,D,C-2021/EPA 1994
Cyanide (total)	mg/L	< 0.010		11/25/24 11:29	B411528	SM 4500-CN B,C,E 2016
Flashpoint	°C	Did Not Flash	DNF*	11/27/24 11:35	B411591	SW 1020C, 2018
Oil and Grease	mg/L	< 5.15		11/25/24 10:30	B411521	EPA1664 Mod, Rev. B 2010
pH	S.U.	7.11	E2	11/21/24 13:35	B411442	SM 4500-H+ B-2011
Temp of pH	°C	23.7		11/21/24 13:35	B411442	SM 2550 B-2010

27 November 2024



Tom Huetter
Harbor Environmental & Safety
5800 Evergreen Dr.
Little Rock, AR 72205
Project: NABORS Landfill Leachate Sample(s)
Project Number: November 2024
Date Received: 21-Nov-24 07:35

ANALYTICAL RESULTS

Lab Number: 2411483-02
Sample Name: Leachate Duplicate
Date/Time Collected: 11/20/24 10:20
Sample Matrix: Leachate

<u>Total Metals</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Arsenic	ug/L	36.7		11/26/24 16:10	B411557	EPA 200.8, Rev. 5.4(1994)
Cadmium	ug/L	< 0.260		11/26/24 16:10	B411557	EPA 200.8, Rev. 5.4(1994)
Chromium	ug/L	8.99		11/26/24 16:10	B411557	EPA 200.8, Rev. 5.4(1994)
Copper	ug/L	1.46		11/26/24 16:10	B411557	EPA 200.8, Rev. 5.4(1994)
Lead	ug/L	< 0.416		11/26/24 16:10	B411557	EPA 200.8, Rev. 5.4(1994)
Mercury	ug/L	< 16.0		11/26/24 15:38	B411560	SW7470A/EPA245.1,3.0- 1994
Nickel	ug/L	125		11/26/24 16:10	B411557	EPA 200.8, Rev. 5.4(1994)
Phosphorus	mg/L	< 0.936		11/25/24 12:50	B411524	EPA 200.7, Rev 4.4 (1994)
Zinc	ug/L	< 20.8		11/26/24 16:10	B411557	EPA 200.8, Rev. 5.4(1994)
<u>Wet Chemistry</u>	<u>Units</u>	<u>Result</u>	<u>Qualifier(s)</u>	<u>Date/Time Analyzed</u>	<u>Batch</u>	<u>Method</u>
Ammonia as N	mg/L	300		11/22/24 8:29	B411475	SM 4500-NH3 B,D,C-2021/EPA 1631
Cyanide (total)	mg/L	< 0.010		11/25/24 11:29	B411528	SM 4500-CN B,C,E 2016
Flashpoint	°C	Did Not Flash	DNF*	11/27/24 11:35	B411591	SW 1020C, 2018
Oil and Grease	mg/L	< 5.32		11/25/24 10:30	B411521	EPA1664 Mod, Rev. B 2010
pH	S.U.	7.08	E2	11/21/24 13:35	B411442	SM 4500-H+ B-2011
Temp of pH	°C	22.6		11/21/24 13:35	B411442	SM 2550 B-2010

27 November 2024



Tom Huetter
Harbor Environmental & Safety
5800 Evergreen Dr.
Little Rock, AR 72205
Project: NABORS Landfill Leachate Sample(s)
Project Number: November 2024
Date Received: 21-Nov-24 07:35

QUALITY CONTROL RESULTS

Wet Chemistry -- Batch: B411442 (Water)

Prepared: 21-Nov-24 13:30 By: CGF -- Analyzed: 21-Nov-24 13:30 By: CGF

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
pH	NA	99.9% / 99.4%	NA / NA		0.430%	

Wet Chemistry -- Batch: B411475 (Water)

Prepared: 22-Nov-24 08:29 By: KJ -- Analyzed: 22-Nov-24 08:29 By: KJ

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Ammonia as N	<0.500 mg/L	98.1% / NA	103% / 107%		2.67%	

Wet Chemistry -- Batch: B411521 (Water)

Prepared: 25-Nov-24 10:30 By: KAW -- Analyzed: 25-Nov-24 10:30 By: KAW

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Oil and Grease	<5.00 mg/L	79.8% / 85.1%	87.6% / NA		6.52%	

Total Metals -- Batch: B411524 (Water)

Prepared: 25-Nov-24 09:32 By: JY -- Analyzed: 25-Nov-24 12:46 By: ST

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Phosphorus	<0.094 mg/L	101% / NA	114% / 108%		3.92%	

Wet Chemistry -- Batch: B411528 (Water)

Prepared: 25-Nov-24 11:29 By: KJ -- Analyzed: 25-Nov-24 11:29 By: KJ

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Cyanide (total)	<0.010 mg/L	100% / 98.0%	97.0% / NA		2.02%	

Total Metals -- Batch: B411557 (Water)

Prepared: 26-Nov-24 09:44 By: ST -- Analyzed: 26-Nov-24 15:32 By: ST

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Arsenic	<0.260 ug/L	102% / NA	104% / 105%		0.329%	
Cadmium	<0.260 ug/L	103% / NA	96.6% / 96.6%		0.0926%	
Chromium	<0.260 ug/L	100% / NA	95.1% / 97.6%		2.55%	
Copper	<0.520 ug/L	103% / NA	97.7% / 98.9%		1.24%	
Lead	<0.416 ug/L	101% / NA	94.1% / 96.2%		2.20%	
Nickel	<1.56 ug/L	102% / NA	98.1% / 98.7%		0.560%	
Zinc	<20.8 ug/L	103% / NA	102% / 104%		1.37%	

27 November 2024



Tom Huetter
Harbor Environmental & Safety
5800 Evergreen Dr.
Little Rock, AR 72205
Project: NABORS Landfill Leachate Sample(s)
Project Number: November 2024
Date Received: 21-Nov-24 07:35

QUALITY CONTROL RESULTS

Total Metals -- Batch: B411560 (Water)

Prepared: 26-Nov-24 10:48 By: KW -- Analyzed: 27-Nov-24 11:39 By: ST

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Mercury	<0.200 ug/L	96.3% / NA	100% / 92.8%		7.48%	

Wet Chemistry -- Batch: B411591 (Water)

Prepared: 27-Nov-24 08:51 By: CNW -- Analyzed: 27-Nov-24 11:35 By: CNW

Analyte	BLK	LCS / LCSD	MS / MSD	Dup	RPD	Qualifiers
Flashpoint	NA	Ignitable / Ignitable	NA / NA		0.00%	Pass1

QUALIFIER(S)

DNF: Sample DID NOT FLASH at or below method required temperature of 100 degrees C or 212 degrees F.
*E2: Estimated Result; Analyzed Outside of Holding Time
*Pass1: Quality Control Meets Lab Acceptability Requirements

All Analysis performed according to EPA approved methodology when available:

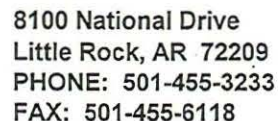
SW 846, Revised December, 1996; EPA 600/4-79-020, Revised March, 1983; Standard Methods.

Instrument calibration and quality control samples performed at or above frequency specified in analytical method.

A handwritten signature in blue ink, reading "Norma James", is written over a horizontal line.

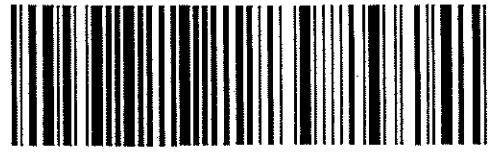
Reviewed by:

Norma James
Technical Director

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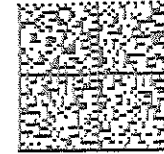
**ENVIRONMENTAL
QUALITY**

5301 NORTSHORE DRIVE
NORTH LITTLE ROCK, AR 72118-5317

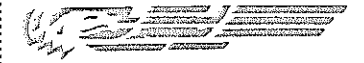


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Label 890 PB, Oct. 2015
Pitney Bowes
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02 7H
0006211068 JAN 28 2025

Ms. Elizabeth Mack
Pretreatment Inspector
City of Springfield
Department of Environmental Services
755 N. Franklin Avenue
Springfield, MO 65802