STATE OF ARKANSAS



DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY

8001 NATIONAL DRIVE, P.O. BOX 9583 LITTLE ROCK, ARKANSAS 72209

PHONE: (501) 562-7444

September 29, 1987

0162-5R-2 - 41906 0123-5R-2 - 41906

Mr. Miller Mathews Sunray Services, Inc. PO Box 783 Springdale, Arkansas 72765

Re: Consent Administrative Orders for Sunray No. 3 (LIS 86-008) and Sunray No. 4 (LIS 86 010)

Dear Mr. Mathews:

This letter concerns the status of the referenced Consent Administrative Orders only and does not refer to the Sunray-Kawneer C.A.O. No. LIS-036. Specifically the following comments are offered for the referenced documents:

Sunray No. 3 (LIS 86-008)

All activities for this Order are now complete and the Agreements are considered fulfilled under the following conditions:

- Sunray must implement the proposed groundwater monitoring system within 30 days of this written approval of the system as specified in the subject C.A.O.
- 2. Well Numbers 1, 2, 3, and 4 are to be monitored quarterly for the following parameters:

Chloride, Sulfate, T.O.C., T.D.S., Specific Conductance, pH, Iron, Manganese

3. The incoming groundwater monitoring data will be evaluated by ADPC&E in order to determine when remedial action will be required. However, you will be expected to notify this Department immediately if three consecutive sampling events reveal an increase (or decrease in pH) in any parameter. Analytical results must be submitted directly to the Department from the contract laboratory within ten days of completion of analysis.

Continued Letter to Mr. Mathews Page 2 September 29, 1987

Sunray No. 4 (LIS 86-010)

All activities for this Order are complete and the Agreements are considered fulfilled under the following conditions:

- 1. Sunray must implement the proposed groundwater monitoring system within 30 days of this written approval of the system as agreed in Item No. 8 of the Order and Agreement Section of the C.A.O.
- 2. Sunray shall sample and analyze the groundwater quarterly each year for the first two years (from this approval letter) then biannually for the remaining three years as specified in Item No. 9 of the Order and Agreement Section of the C.A.O. The wells to be monitored shall include numbers 5,6, 7,8,9 and shall be analyzed for pH, Chlorides, TDS, specific conductance, Iron, Manganese, and COD.
- 3. The incoming groundwater monitoring data will be evaluated by ADPC&E in order to determine when remedial actions will be necessary. However, you will be expected to notify the Department immediately if three consecutive sampling events reveal an increase (or decrease in pH) in any parameter. Analytical results must be submitted to ADPC&E directly from the contract laboratory within 10 days of the completion of analysis.

These two Consent Orders (LIS 86-008 and LIS 86-010) are considered complete at this time and will be so indicated in our records. Failure to comply with the the above conditions will result in additional enforcement procedures.

If there are any questions, please contact me at this office.

Sincerely,

Mark Witherspoon

Chief, Solid Waste Division

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MW:jfs

cc: Paul Means, Director
Cheryl Terai, Acting Chief, Legal Division
Don Morgan, Field Inspector, EFS
Rick Briggs, Washington Co. Courthouse

Miller J. Mathews Sunray Services, Inc. . Springdale, AR

RE: Site 4 Status Report-A.O.-Lis 86-010

Dear Miller:

As you know, Sunray has just over three weeks to complete the Site 4 closure. During the past 30 days, operations on Site 4 have been severly limited due to weather. We have had two different periods of snow (3 1/2 in. total) and a total of 3.8 in. rainfall. This moisture combined with already saturated soil has affected our ability to work the dirt rather 'han our ability to move the dirt in place. The current condition of Site 4 and the next 30 day weather forecast make the autlook for scheduled closure dim. We have moved barely 5000 cu. yards of material over the past 30 days and we have not been able to finish any of it. To move the remaining material (approx. 16,000 cu. yards) and to properly finish it and complete ditching and terracing, we need 30 good working days. To complete revegetation we will need ten days, but realistically those days need to be in April to enhance germination. Miller, to properly complete the closure of Site 4 according to DPC&E regulations, I suggest we apply for a 90 day extension because of inclement weather we had over the past 90 days and the anticipated forecast for the next 60 days.

Paul J Hughes

Surray Services
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