

Kacy Murillo (adpce.ad)

Subject: RE: DEQ review of Dye trace work plan at Nabors

From: Travis Atwood (adpce.ad)
Sent: Thursday, January 19, 2023 4:39 PM
To: 'McCullough, Dan'
Cc: Bill Sadler (adpce.ad); Blake Whittle (adpce.ad); Annette Cusher (adpce.ad)
Subject: DEQ review of Dye trace work plan at Nabors

Good Afternoon Dan,
Here is the final DEQ review letter of the dye study work plan that we've recently discussed. There were no significant changes since our phone conversation about the comments in this letter.
Let me know if you have any questions.
Regards,
Travis

Travis Atwood | Geologist
Division of Environmental Quality | Office Land Resources
Assessment and Remediation | Groundwater Branch
t: [501-607-7215](tel:501-607-7215) | travis.atwood@adeq.state.ar.us





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ENERGY & ENVIRONMENT

January 19, 2023

Electronic Mail Only

Dan McCullough, P.G.
SCS Engineers
11219 Richardson Drive
North Little Rock, AR 72113

RE: NABORS Landfill
DEQ Review of Work Plan for Dye Trace Study
Permit No: 0249-S1-R2 AFIN: 03-00051
Document ID: 83281 Cross Reference: 83185

Dear Mr. McCullough,

The Division of Environmental Quality Office of Land Resources (DEQ) has reviewed the Work plan for the Dye Trace Study at Nabors Landfill submitted on January 6th, 2023. After review, DEQ has the following comments.

1. Please provide a sampling point in Hutch Creek above the low water crossing at county road 16.
2. Table 6 in Ozark Underground Laboratory's book shows that fluorescein can be affected by landfill leachate. Nearby wells MW-1, MW-1R and CAO-1 are elevated in arsenic, cobalt, 1-1-Dichloroethane, and MTBE with vinyl chloride also elevated in two of the three wells. These three wells are also higher in chloride than the other wells on site; indicating a possible leachate component to the impact. Please provide justification of fluorescein over the use of other dyes with considering to this observation.
3. Within 15 days of this letter, please provide DEQ with the report detailing the previous work done at the site from the supplemental subsurface investigation. In addition, section 4.1 describes already performed background sampling. Please provide DEQ with the results analyzed by the Ozark Underground Laboratory.
4. 40 CFR §§ 144 and 146.6 address requirements for Class V UIC wells. Since these are permitted by rule, you must obtain authorization to inject. Please note that authorization is required from the Permits Branch of the Office of Water Quality, Division of

Environmental Quality. Please contact Linda Hanson, P.G. at hanson@adeq.state.ar.us or at 501.682.0646 for information pertaining to these requirements.

5. Please do not proceed with dye injection until these comments are addressed.

If you have any questions or need any additional information, please contact me at 501-607-7215 or travis.atwood@adeq.state.ar.us.

Sincerely,



Travis Atwood
Geologist, Division of Environmental Quality
5301 Northshore Drive, North Little Rock, AR 72118-5317

cc: Bill Sadler, P.G., DEQ
Blake Whittle, P.G., DEQ
Annette Cusher, P.E., DEQ