



ARKANSAS

ENERGY & ENVIRONMENT

February 23, 2023

Rusty Janssen, Senior Vice President
Lakeshore Recycling Systems
329 S. Commerce
Russellville, AR 72801

rjanssen@LRSrecycles.com

RE: AFIN No. 03-00051; DEQ SWD Permit No. 0249-S1-R2
OZH, LLC-former Nabors Class I Landfill, Three Brothers, Baxter County
Authorized by Rule Class V UIC Well Inventory Requirements
Dye Trace Study Injection

Dear Mr. Janssen:

The Division has reviewed the January 19, 2023 request for authorization for the subsurface injection of dye-tracing fluids (classified as experimental technology) with additional information received February 1, 15, and 21, 2023. SCS Engineers (SCS) proposes the injection of ten (10) pounds of water-soluble dye, Hue Uranine (also known as Fluorescein) mixed with ten (10) gallons of potable water (from a domestic water well located approximately 5.5 miles northeast of the site) into an open borehole, IW-1, at the proposed landfill cell. The depth of IW-1 is 91.29 feet below ground surface at the above-referenced facility completed in the shallow water-bearing zones in the Cotter Dolomite Formation. The dye mixture will be followed by a minimum volume of six hundred (600) gallons of potable water as a post-injection flush, also to be injected via gravity flow. These activities will be completed in order to perform a hydrogeologic evaluation of the site in the proposed lateral and vertical expansion area of the proposed OZH-former Nabors Class 1 landfill as required by the Arkansas Pollution Control and Ecology Commission Rule 22. These injection activities will be conducted according to the Inventory Requirements for Authorized by Rule Class V Underground Injection Control (UIC) Wells.

This letter is authorization for SCS to inject Hue Uranine and potable water via gravity flow into open borehole IW-1 at the above-referenced facility and as approved by the Office of Land Resources on January 31, 2023. The injection activities as described in the inventory requirements will be “authorized by rule,” as described in 40 CFR § 144.84 and as adopted by reference in APC&EC Rule 17. The operation of the injection well must not cause further migration of contaminants into underground sources of drinking water in accordance with 40 CFR § 144.12(a). This authorization expires upon completion of the injection activity.

You must comply with the applicable requirements of APC&EC Rule 17 [(Rule §§ 17.301, 17.401, 17.501 (E), and 17.601(14)], including the portions of 40 CFR that have been incorporated by reference (40 CFR Parts 124, 145, 144, and 146; as amended).

Please notify the No-Discharge Section, Permits Branch of the Division of Environmental Quality-Office of Water Quality (OWQ) by email after the injection event has been completed. In the event the dye has been found to surface at any location, on or off-site, the OWQ must be notified immediately upon discovery.

If you have any questions pertaining to this authorization, contact Linda Hanson, P. G. of this office at (501) 682-0646 or at hanson@adeq.state.ar.us.

Sincerely,



Bryan Leamons, P.E.
Senior Operations Manager
Office of Water Quality

cc: Jamal Solaimanian, Engineer Supervisor, OWQ
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