



ARKANSAS

ENERGY & ENVIRONMENT

Sent via Electronic Mail

March 23, 2023

Mr. Tom Huetter, P.G., Project Manager
Harbor Environmental and Safety
5800 Evergreen Drive
Little Rock, Arkansas 72205

RE: **April 2022 and October 2022 Groundwater Monitoring Reports**
Nabors Landfill, Three Brothers, Arkansas
AFIN 03-00051; Permit 0249-S1-R2

Dear Mr. Huetter,

The Division of Environmental Quality Office of Land Resources (DEQ) has reviewed the April 2022 and October 2022 groundwater monitoring reports, dated June 2022 and December 2022 respectively. DEQ has the following comments:

1. In the 1st half of 2022 report (Doc ID 82274), Table 3-5 displays the lower confidence limit (LCL) exceedances for various constituents. However, upon review the LCLs for arsenic in NAB-2 and thallium in MW-1R do not exceed the groundwater protection standard (GWPS). Please correct in this table and elsewhere mentioned in the report. Including graphs and tables in the appendices.
2. Similarly, in the 2nd half of 2022 report (Doc ID 83034), Table 3-5 displays the LCL exceedances for various constituents. However, upon review the LCLs for cobalt in MW-3, arsenic in NAB-2 and MW-1 do not exceed the GWPS. Please correct in this table and elsewhere mentioned in the report. Including graphs and tables in the appendices.

3. Moving forward, please provide an additional table that tracks any well/constituent where the LCL has historically exceeded the GWPS, along with any of the same well/constituents that have since had their upper confidence limit (UCL) go below the GWPS. Please include the following information in the table:
- Well
 - Constituent
 - Initial sampling date when LCL exceeded the GWPS
 - Last date the UCL returned to being below the GWPS, if applicable
 - If the UCL exceeds GWPS for this reporting period

The goal is to identify any constituent/wells that comply with Rule 22.1208(e)(2), and may meet one criteria for having their corrective action completed. In the example table below, we can see the highlighted row would comply with 22.1208(e)(2). In most cases, we would see N/A in the 4th column. Also, dates in this column could also “reset” if the constituent UCL climbs back above the GWPS.

Example Table:

Well	Constituent	Initial Sampling Date of Exceedance of LCL	Last date the UCL returned to being below the GWPS, if applicable	UCL exceeds GWPS for this reporting period (yes/no)
MW-1	Arsenic	Oct 7, 2018	Apr 16, 2020	No
MW-1	Cobalt	Apr 12, 2009	N/A	Yes
MW-2	Arsenic	Apr 15, 2007	Oct 10, 2017	No
MW-5	Thallium	Oct 10, 2017	N/A	Yes

Please provide revised reports to address comments 1 and 2 within thirty (30) calendar days of receipt of this correspondence. If you have any questions, please contact me at (501) 682-0836 or e-mail at mcdaniel@adeq.state.ar.us.

Sincerely,



Clay McDaniel
 Engineer, Division of Environmental Quality
 5301 Northshore Drive, North Little Rock, AR 72118