

DATE: April 21, 2023

TO: Clay McDaniel, *Engineer*
DEQ Office of Land Resources

FROM: Thomas Huetter, PG, *Senior Project Manager*
Harbor Environmental and Safety

RE: Response to Comments
NABORS Landfill
April 2022 and October 2022 Groundwater Monitoring Reports

AFIN: 03-00051
PMT#: 0249-S1-R2
Received
By Kacy Murillo at 1:44 pm, Apr 24, 2023
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TO: MM>FILE <KM

Harbor has reviewed the DEQ letter dated March 23, 2023. Harbor has prepared the following responses (DEQ comments in italics):

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.*

The confidence interval analysis was inadvertently run in "corrective action" mode which resulted in false exceedances. The analysis was re-run, and the results were consistent with the comment. The report was revised accordingly, and the revised confidence interval analysis graphs were included in Appendix C of the revised report.

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.*

See response to comment 1 above.

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.*

The new table will be included in future reports.

Please let either of the undersigned know if you have any questions or comments regarding this response. Harbor appreciates the opportunity to assist DEQ on this project.

Sincerely,

HARBOR



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