



**DIVISION OF  
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders  
GOVERNOR

Shane E. Khoury  
SECRETARY

Via Email Only to: [ebrickman@Ensafes.com](mailto:ebrickman@Ensafes.com)

10/25/2023

Ms. Emily J. Brickman  
EnSafe Inc.  
3183 North Katherine Avenue Fayetteville, Arkansas 72703

AFIN: **03-00051**  
PMT#: **0249-S1-R2**  
**Received**  
By Haley Griffith at 10:23 am, Oct 27, 2023  
DOC ID#: **84804**  
TO: **CH>FILE <HG**

RE: NABORS Landfill, Three Brothers, AR  
**EnSafe Scope of Services and Fee Estimate**  
AFIN 03-00051; Permit 0249-S1-R2; EnSafe Contract No. 4600043737

Dear Ms. Brickman:

The Division of Environmental Quality Office of Land Resources (DEQ) has reviewed the Scope of Services and Fee Estimate dated September 6, 2023. DEQ has reviewed your proposal and would like to request the following revisions:

1. Footnote at the Bottom of Page 2: Please amend the proposal to include an evaluation of the leachate collection system (LCS), with quarterly inspections conducted by Advanced Fluid Technologies (AFT) to ensure that the LCS is properly maintained and operational.
2. EnSafe Task 2.4 / Harbor Task 5 – Semi-Annual Groundwater Monitoring: Please update this task to include collection and analysis of the dye trap packets. The dye traps are currently deployed at 53 locations on or very near the landfill property. The sampling methodology will follow the approved work plan for the Dye Trace Study (Document ID numbers 83185, 83332, and 83340). The dye traps should be sent to Ozark Underground Laboratory for analysis.
3. Table titled “Field Parameters and Assessment Monitoring Constituents”: Please revise this table to include the following organic constituents, as they are listed in Rule 22 Appendix 1:
  - Bromoform also known as Tribromomethane
  - 1,2-Dibromo-3-chloropropane (DBCP)
  - 1,2-Dibromoethane also known as Ethylene Dibromide (EDB)
  - 1,1-Dichloroethene also known as 1,1-Dichloroethylene and Vinylidene Chloride

DEQ requests that EnSafe incorporate these revisions into the scope of work that will be submitted for approval by DEQ. If you have any questions or need further clarification, please contact Clay McDaniel at (501) 682-0836 or e-mail at [mcdaniel@adeq.state.ar.us](mailto:mcdaniel@adeq.state.ar.us).

Sincerely,

Charles Hurt, P.E.  
Engineering Operations Manager, Division of Environmental Quality