

AFIN: 03-00051
PMT#: 0249-S1-R2
Received <i>By Haley Griffith at 11:26 am, Nov 6, 2023</i>
DOC ID#: 84826
TO: BS>FILE <HG

Haley Griffith (adpce.ad)

Subject: RE: Response to Document 84718 Dye Test Investigation

From: McCullough, Dan <DMcCullough@scsengineers.com>
Sent: Monday, November 6, 2023 10:44 AM
To: Bill Sadler (adpce.ad) <Bill.R.Sadler@adeq.state.ar.us>
Cc: Beau Harp <BHarp@LRSrecycles.com>; Rusty Janssen <RJanssen@LRSrecycles.com>
Subject: Response to Document 84718 Dye Test Investigation

Bill;
In response to the October 9, 2023 letter from DEQ, (Document 84718) and on behalf of Lakeshore Recycling Systems (LRS), SCS plans to collect and analyze the dye traps and prepare a final report to be submitted by December 22, 2023. If you have any questions, please do not hesitate to contact me.

Dan McCullough PG
SCS Engineers
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November 6, 2023
File No. 27222139.01

Mr. Bill Sadler, P.G.
Arkansas Department of Energy and Environment
5301 Northshore Drive
North Little Rock, AR 72118-5317
Submitted via Email: sadler@adeq.state.ar.us

Subject: NABORS Landfill
NABORS Landfill Activities
Site AFIN: 03-00051; Site Permit No. 0249-S1-R2

Dear Mr. Sadler:

SCS Engineers (SCS) is pleased to present you with this status update on the groundwater Dye Test at NABORS Landfill. SCS has scheduled on-site activities in the month of November to collect the remaining dye traps to submit for analyses. Test results will be incorporated into the Dye Test Report to be submitted to the Division of Environmental Quality (DEQ) by December 22, 2023.

In addition, SCS installed five (5) borings at the NABORS landfill to obtain hydrogeologic properties and serve as monitoring points for the Dye Test (DIN 83185). SCS now request approval to abandon these borings.

APC&EC Regulation No.22.1103(f), states *“Division Approval - No monitor well or piezometer shall be installed, decommissioned, replaced, repaired or otherwise altered without prior approval by the Solid Waste Management Division. Upon completion of a well installation, replacement, decommissioning, repair or alteration, a report shall be made to the Solid Waste Management Division and a copy placed in the facility operating record. The work quality and methods must be certified by the supervising professional.”*

Decommissioning will conform with the “EPA Handbook of Suggested Practices for Design and Installation of Groundwater Monitoring Wells”. Anderson Engineering Consultants, Inc. (AECI), a licensed water well contractor in the state of Arkansas, will perform decommissioning, while a qualified groundwater scientist from SCS will oversee and document the procedure. At each boring, a tremie pipe will be used to pump cement/bentonite grout into the borehole from the bottom upward to within four feet below land surface. The remaining four feet to land surface will be backfilled with bentonite hole plug.



Mr. Bill Sadler
November 3, 2023
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If you have any questions or comments regarding this document, please do not hesitate to contact me at (501) 812-4551 or dmccullough@scsengineers.com.

Sincerely,



Stacie Whitmer, REM, ASP, JD
Senior Project Manager
SCS Engineers



Dan McCullough, P.G.
Senior Project Manager
SCS Engineers

SW/DM