

PO Box 61
Mountain Home, Arkansas 72654



April 2, 2024

Caleb Osborne
Director, Arkansas Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Re: ADEQ Permit No. 0249-S1-R2
NABORS Landfill

Dear Director Osborne,

I would like to bring to your attention an issue involving the post closure maintenance of the NABORS landfill. As you know, the landfill's full Substantial Completion of Closure was reviewed and certified by ADEQ Director Becky Keough on December 9, 2019. During its post closure status since then, the maintenance has been provided by an environmental engineering contractor hired by ADEQ and paid through funds obtained from the state Post Closure Trust Fund.

Although the landfill is inactive and is certified by the Division as closed, the landfill permit remains open and active. Originally, the landfill was forced to close by ADEQ because of the risk to public health and safety due to groundwater contamination. The drinking water source for several counties, Bull Shoals Lake and Lake Norfolk, receive surface and groundwater from the landfill site which is underlain by karst dolomite featuring springs and sinkholes. The reputation of the quality of the waters of this region is of utmost importance to its outdoor recreation economy.

As stated in our letter (attached) to ADEQ on March 5, three ADEQ inspection reports(attached) beginning at the start of the second half of 2023 reveal that multiple leachate collection system pumps were turned OFF and leachate overflow was observed. The Semi-Annual Leachate Report (attached) for the same July-December period states that "zero" leachate was collected for treatment in December. The previous semi-annual leachate report for the first half of 2023 recorded over 200,000 gallons collected.

AFIN: 03-00051

PMT#: 0249-S1-R2

Received

By Haley Griffith at 9:04 am, Apr 4, 2024

DOC ID#: 85339

TO: GB>FILE <HG

Missing from the ADEQ public database is the semi-annual groundwater report for 2023. We are very concerned about the status of the groundwater volume and chemistry since leachate removal has been abandoned over this nine-month period; and potentially, 300,000 gallons (30 tanker truckloads) of leachate have been discharged into our groundwaters. Also, we note that the final results of the groundwater dye study, initiated by LRS in February and completed in November of 2023, were not submitted to ADEQ by December 22 as promised. Now missing from the public database are the quarterly inspection reports for 2023.

While not mentioned in the inspection reports, the possibility exists that leachate discharging from the landfill waste mass may accumulate at the cover liner. If enough leachate is allowed to accumulate on the bottom liner, a hydrostatic head is created potentially damaging the bottom liner integrity.

We ask for an explanation as to why the landfill leachate pumps were turned OFF. Was the Ozark Mountain Solid Waste Management District, the owner of NABORS landfill, notified of the situation? Why were the pumps allowed to remain OFF when inspection reports pointed to the permit violation? Why does ADEQ not demand from LRS the results of the 2023 groundwater dye study? Why does ADEQ continue to list the landfill permit as active and open?

Our March 5 letter to ADEQ has not been given the courtesy of any type of response. As of the date of this letter, the leachate pumps remain in the OFF position.

Given the toxic nature of the leachate, our members are appropriately alarmed by these developments. We want ADEQ to be a responsible partner in the protection of our environment. We want to see ADEQ effectively maintain NABORS landfill for the long term. That is why we bring our observations and questions to you.

Thank you for your concern and the favor of a reply.

Steve Blumreich
President, Friends of the North Fork and White Rivers

Sam Cooke
Immediate Past President, Friends of the North Fork and White Rivers

PO Box 61
Mountain Home, Arkansas 72654



March 5, 2024

Christopher Krou
Arkansas Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Re: ADEQ Permit No. 0249-S1-R2
NABORS Landfill

ADEQ inspection reports (3) of the closed NABORS landfill from the second half of 2023 indicate that multiple leachate collection system pumps were observed being in the OFF position. This is in violation of the ADEQ permit.

The Semi-Annual Leachate Report for the same period ending in December 2023 reveals that "zero" leachate was collected from the landfill site for treatment. The same report for the first half of 2023 revealed that 200,000 gallons of leachate were collected. The inspection reports and the leachate report are attached.

Can you explain why the leachate collection pumps are allowed to remain in the OFF position? Can you explain why there was zero collection of leachate for the second half of 2023? Is there a greater risk of groundwater contamination resulting from this?

Friends of the North Fork and White Rivers urge you to investigate this matter immediately. We appreciate your attention and reply.

Sincerely,

Sam Cooke
Immediate Past President, Friends of the North Fork and White Rivers
870-307-8922