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[REDACTED]
From: Travis Atwood [REDACTED]
Sent: Tuesday, September 27, 2022 3:27 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Supplemental Investigation at NABORS Landfill

Dan,
DEQ has reviewed the SCS workplan regarding borings/wells and a dye trace study at the Nabors landfill and has the following comments.
DEQ understands that the purpose of this investigation is to gather additional information concerning the groundwater at the landfill during the due diligence period between LRS and Ozark Mountain Solid Waste District. DEQ also recognizes that this information could be utilized towards future hydrologic investigations for permitting processes and requirements.
With regard to the borings detailed in the workplan, any borings/piezometers/monitoring wells need to be installed following Rule 22.1103(a-g), regardless of the wells' intended uses.

DEQ is willing to approve the borings as presented in the workplan, but also suggests an additional borehole be placed in the area between the blasting in cell 3B and the locations where the groundwater elevations were documented to drop in NAB-2 and MW-509-D. The expectation would be to delineate the effects of the blasting that occurred in this area.

Regarding the Dye Trace portion of the workplan, DEQ requests that a separate workplan be submitted for approval which provides more details of the methodology and monitoring locations to be used in the dye trace study. DEQ review and approval will allow input for planning of any future dye trace studies. Once a dye trace study has been performed, it complicates any other near-future dye trace tests that could be required for permitting purposes.
It is also requested that the dye trace study be performed after the semi-annual groundwater sampling occurs that is currently scheduled for October. Since the dye test is being proposed in the driest time of the year when groundwater elevations are normally the lowest, the facility should anticipate travel times much greater than if the dye study was implemented during the high groundwater season.

Regards,
Travis Atwood | Geologist
Division of Environmental Quality | Office Land Resources
Assessment and Remediation | Groundwater Branch

[REDACTED]



From: McCullough, Dan [REDACTED]
Sent: Sunday, September 25, 2022 12:53 PM
To: [REDACTED]
Subject: Supplemental Investigation at NABORS Landfill

Bill and Blake;

Attached is the workplan I discussed with Blake last week. As you review this workplan, please feel free to call me to discuss at any time. I welcome your comments and open to revisions after discussions at any time. I plan to keep you apprised of the findings during field activities. As I have discussed, LRS is in the due diligence period with the Ozark Mountain District for the purchase of the NABORS facility therefore it is critical that concerns expressed with the subsurface conditions and groundwater be further identified and previous results be verified prior to finalizing the purchase. In addition, it is anticipated that the information gathered during this investigation will be later utilized for permitting, however LRS is not asking DEQ to approve the plan for that purpose now. During future permitting efforts a workplan required under Regulation 22 will be submitted. However, should DEQ now know of items that they would like to see in a future workplan in addition to the items presented in this workplan, please let me know.

Since timing is critical, and the availability of drillers is limited, we plan to mobilize to the site Monday September 26 to begin drilling. Drilling will take approximately 2 weeks which should allow time to discuss locations and number of borings and to make revisions to locations and add additional borings if necessary.

Thank you for your consideration and let's work closely together.

Dan McCullough PG

SCS Engineers

