March 4, 2026

The Honorable Darryl Mahoney, dmahoney@garlandcounty.org
501 Ouachita Ave., Suite 4B
Hot Springs, AR 71901

RE: Review of Piezometer Installation Report and Groundwater Separation Documentation
Garland County Class 4 Landfill
Permit Number: 0300-S4 AFIN: 26-00405

Dear Judge Mahoney:

The Division of Environmental Quality Office of Land Resources (DEQ) has reviewed the Piezometer Installation Report and Groundwater Separation Documentation for the Garland County Class 4 Landfill submitted on August 26, 2025. Following review, DEQ has the following comments:

1. The survey of the piezometers should have included a survey elevation for the top of casing of each piezometer. The only elevations on the stamped survey are for the concrete pad at the piezometers. Please provide a stamped survey for the top of casing elevations for each piezometer.

2. If the top of casing elevations used in the development of the report are affected by the survey data requested in Comment 1 of this letter, please revise the groundwater elevations presented in section 2.3 of the piezometer installation report and the high groundwater contours presented on Drawing 1.

3. The 1999 Hydrogeological and Geotechnical Report for the Garland County Class 4 Landfill (Document ID 10047) contains documentation of the installment of a piezometer named "PZ-1." This piezometer appears to have been included in figures for the August 2025 installation report and included in the stamped survey. Please rename the newly installed piezometers such that the piezometer name "PZ-1" is not duplicated and revise the report to reflect the name change(s) throughout the report and the stamped survey.

4. The report should have included piezometer development records as specified in the list of deliverables found in the Revised Proposed Piezometer Workplan (Document ID 85206) approved by DEQ. Please provide the piezometer development records for each piezometer.

5. The "Total Depth" on each of the field boring logs does not match the "Total Depth Drilled" on the corresponding monitoring well installation record for the piezometers. Additionally, the "Total Depth of Monitoring Well from TOC," which include the "Stickup" of three feet, on the monitoring well installation record appears to be incorrect. See the table below for details.

Field Boring Log		Monitoring Well Installation Record	
PZ-1 Total Depth	27.85 feet	PZ-1 Total Depth Drilled	32.25 feet
PZ-1 Terminated Depth	32.25 feet	PZ-1 Total Depth of Monitoring Well from TOC	35.25 feet
PZ-2 Total Depth	27.85 feet	PZ-2 Total Depth Drilled	24.85 feet
PZ-2 Terminated Depth	27.85 feet	PZ-2 Total Depth of Monitoring Well from TOC	27.85 feet
PZ-3 Total Depth	23.30 feet	PZ-3 Total Depth Drilled	20.30 feet
PZ-3 Terminated Depth	23.30 feet	PZ-3 Total Depth of Monitoring Well from TOC	23.30 feet

Please review the field notes and revise the field boring logs and the monitoring well installation records such that they reflect the correct, equivalent depths or change the terminology on the boring logs and installation records such that each more accurately describes what the data is intended to represent.

Please incorporate the corrections and information requested above in a revised piezometer installation report and submit the revised report within thirty (30) days of receipt of this letter. Should you have any questions or concerns, please feel free to contact me at (501) 682-0598 or email at Jennifer.Pearson@Arkansas.gov

Sincerely,



Jenny Pearson
Professional Geologist, Division of Environmental Quality

cc: DEQ - Banic, Sadler, Bennett
Owen Carpenter, P.E., P.G., Terracon Consultants, Inc. (owen.carpenter@terracon.com)