

EXPERT PANEL
for
THE DICKSON COUNTY LANDFILL
DICKSON, TENNESSEE

Memorandum

TO: Timothy V. Potter, Esq., Reynolds Potter, Ragan & Vandivort, PLC
Michael K. Stagg, Esq., Waller Lansden Dortch & Davis, LLP
Michael E. Wall, Esq., Natural Resources Defense Council, Inc.

FROM: David E. Jackson, P.G., P.H.
David E. Langseth, Sc.D., P.E., D. WRE
Stavros S. Papadopoulos, Ph.D., P.E. NAE

MATTER: Natural Resources Defense Council, Inc., *et al.*, v. County of Dickson, Tennessee,
et al., No.: 3:08-cv-00229
Consent Order Entered December 9, 2011

DATE: August 17, 2020

SUBJECT: Expert Panel Communication Number 15a,
Revision to New Detection Monitoring Well Program

In consideration of new information about the feasibility of installing new detection monitoring wells (DMW) in the locations indicated in the Dickson County Landfill (DCL) Expert Panel (EP) Communication 15, the EP hereby amends Communication 15 as follows.

The EP requests that the County proceed to identify viable locations for installing new DMWs at or nearby to the four locations shown on the attached figure and enter into agreements with the property owners that allow for well construction and continuing access for water quality testing and other associated activities, such as geophysical testing and well maintenance. These agreements should run with the property, to assure long term access to the wells.

We recognize that identifying property owners who will agree to have a well installed on their property can not be assured, but we request that diligent efforts be made to secure suitable locations and enter into agreements with the property owners on or before October 2, 2020. We also recognize that some compensation to the property owners may be appropriate and authorize payment of up to \$2,500 per well to property owners who agree to have a well installed on their property.

Additionally, please secure quotations from one or more qualified drilling contractors to install these wells in accordance with the procedures outlined in DCL Communication 15. The EP desires to install these wells as soon as feasible.

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Date: April 15, 2015
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We additionally request that the County proceed to identify existing groundwater wells that are outside of, but proximate to, the EERA boundary, and that are available and appropriate candidates for use as either DMWs or to complement potential new DMWs. As is possible, given likely limitations to available data, please include in the evaluation information on each well's location, ownership, drilling date, current use, ground elevation, total depth, casing depths, producing horizon depth and formation, and yield. We request that this task be completed and a report on the findings issued to the EP by or before November 6, 2020.

cc: Mayor Bob Rial
Mr. Shaun Winter, EnSafe
Ms. Cecilia Segal, NRDC