

Geology and Groundwater Group Recommendations

I. Editing Issues

1. Add definitions for the following terms:

- a. Saturated Permeable Zone
- b. Topographic Map
- c. Potentiometric Map

2. Match the nomenclature of definitions with the text of the regulations.

Example: Page 148 of Draft 2B refers to structure map and in the definitions it is defined as a structure contour map.

3. Change the definition of aquifer to explain what we mean by significant quantities of water (After a maximum of 24 hours, yields enough water to take a groundwater sample.)
4. On page 148 of Draft 2B, change text in 803.C.2b from “all saturated permeable zones to a depth of at least 30 feet...” to “all zones to a depth of at least 30 feet...”
5. On page 152 of Draft 2B, change text in 805.5.b.ii from “Clause A.5.b.i.” to “Subsection A.5.b.i”
6. Insert into the regulations the stipulation that all analytical data used for groundwater has to be analyzed by a LA certified lab.
7. Change wording of 805.B.4.b. on page 153 to language similar to 805.D.8.c. on page 161

II. Our recommendation concerning Performance Based Geology Requirements is that this method for describing the subsurface geology be used only as an option for existing permitted facilities, which are planning a lateral and/or vertical expansion or changing the permitted lowest point of excavation within the permitted foot print. A work plan to characterize the geology shall be submitted to the LDEQ for prior approval if an existing facility would like to use this option. (We suggest that the performance based geology option be added in as 803.A.2.b. while the current “b” would be moved to “c” etc.)

III. Concerning Type III facility boring requirements, we should incorporate the “GRID” documents language of “installing a minimum of 3 borings and at least 1 boring for every 8 acres of regulated unit (s) to a minimum depth of 5 feet below the lowest point of excavation,” into the Standards. We suggest that the Type III boring requirement information be added in at 803.A.1.a.

