June 20, 2025

Mr. David Isaacs, Engineer
ADE&E Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Subject: **Response to May 7, 2025 Letter - Acknowledgment of Surface Water Sampling Report**
Certification of Post-Closure Care
Drew County Class 1 Landfill
Permit Number: 0154-S AFIN: 22-00040
SCS Project No. 27223402

Dear Mr. Isaacs:

On behalf of Drew County, Stearns Conrad and Schmidt (SCS Engineers) is submitting this response to your letter dated May 7, 2025 regarding the surface water sampling report and the post-closure care of the closed Class 1 landfill located northeast of Monticello, Arkansas off of County Road 83 (Jose Chapel Road). The site is in a rural part of the county on an 80-acre tract of land within Section 29 and 32, Township 11 South, Range 6 West. This response addresses the post-closure care certification required by Arkansas Pollution Control & Ecology Commission Rule 22.1302(f).

The landfill operated from about 1978 to 1994 and was closed in accordance with new federal and state solid waste management regulations of that time, which offered landfill owners a time period to close older landfills rather than upgrade to the newer landfill standards. The Department issued a closure acceptance letter dated September 21, 1994, at which time the site entered into a two (2) year post-closure care period. The post-closure care period has been completed at the site for almost three decades.

The site closure presented in the original permit application (DIN 35947) included the planting of trees. This occurred shortly after the 1994 site closure. Adjacent properties are forested and appear to also be in a forest management program, as evident by periodic harvesting, thinning and reforestation efforts. Subsequently, the Class 1 site trees were harvested around 2012, and again replanted with pine tree seedlings. Currently, the site appears to be mostly covered with ten (10) to twenty (20) foot tall pine trees. The trees have become an integral part of the final cover system at the site, accomplishing and maintaining erosion control and providing evapotranspiration. Periodic thinning, harvesting and replanting are typical forest management and reforestation activities of the area. Reforestation practices occur without removal of trees stumps or intentional soil cover disturbances. Since closure the county has continued to monitor and provide periodic maintenance of the site.

Drew County has accepted and maintained responsibility for the landfill since closure and has performed post-closure care activities uninterrupted. Based on the permit application details of post closure care and based on the actual post-closure care conducted over the last three decades, SCS Engineers can certify that the post-closure care period has been conducted in accordance with the standards set at the time of closure. See the attached certification form.

If you have any questions or comments regarding this certification letter, please feel free to contact me at cmcwilliams@scsengineers.com or at 501-249-4935 at your convenience.

Sincerely,
SCS Engineers

Clark McWilliams, P.E.
Senior Project Manager
SCS Engineers

Kyle Jackson, E.I.
Senior Project Professional
SCS Engineers

Enclosure: Post-Closure Care Certification

Professional Engineer's Certification

"I certify to the best of my professional judgment that post-closure care of Class 1 landfill (Permit Number: 0154-S) has been performed and completed in accordance with Arkansas Division of Environmental Quality rules and permit application details in effect at the time of closure. This certification is contingent on all information supplied to the signatory authority, at the time of certification is unquestionably accurate and was provided in good faith."



