

Haley Griffith (adpce.ad)

Subject: RE: Albermarle Class 3 Landfill - (0175-S) 2025 AEIR

From: Christ, Scott <scott.christ@aecom.com>
Sent: Thursday, August 27, 2026 5:16 PM
To: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>
Cc: Stephen Stamps <stephen.stamps@albemarle.com>
Subject: RE: Albermarle Class 3 Landfill - (0175-S) 2025 AEIR

CAUTION: External Email

Mr. Bennett,
As requested, please see the attached revised pages for the 2025 AEIR for the referenced Class 3 Landfill.

Please let me know if you have any questions.
Thanks,
Scott

Scott Christ, P.G.

Project Manager, Remediation - Oil & Gas
M 281.728.2997
scott.christ@aecom.com

AECOM

From: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>
Sent: Thursday, August 13, 2026 11:03 AM
To: Christ, Scott <scott.christ@aecom.com>
Subject: Albermarle Class 3 Landfill - (0175-S) 2025 AEIR

Thanks for returning my call. Please address the issues noted below. Please respond within 10 business days. If you have any questions, please use the information below.

- 1) Survey benchmarks
- 2) New closure and Post-closure

Respectfully,



Richard Bennett, PE
Permit Engineer
E&E | Environmental Quality | Land Resources
e: richard.bennett@arkansas.gov
t: [501-682-0861](tel:501-682-0861)

August 27, 2026

Mr. Richard Bennett, PE
Office of Land Resources
Solid Waste Management Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Letter sent via email to: Richard.Bennett@arkansas.gov

RE: Revised Pages - 2025 Annual Engineering Inspection Report
Albemarle South Plant, South Plant Landfill
Permit No. 0175-S
AFIN: 14-00028

Dear Mr. Bennett:

AECOM Technical Services, Inc. (AECOM), on behalf of Albemarle Corporation (Albemarle), is submitting one electronic copy of the requested revised pages for the *2025 Annual Engineering Inspection Report* to the Arkansas Department of Environmental Quality (ADEQ) for the South Plant Landfill.

If you have any questions or comments regarding this submittal, please do not hesitate to contact Stephen Stamps with Albemarle at 870-235-6663 or myself at 281-728-2997.

Sincerely,

AECOM



Scott Christ, PG
Project Manager
T: 281-728-2997
E: scott.christ@aecom.com

cc: Stephen Stamps - Albemarle Corporation

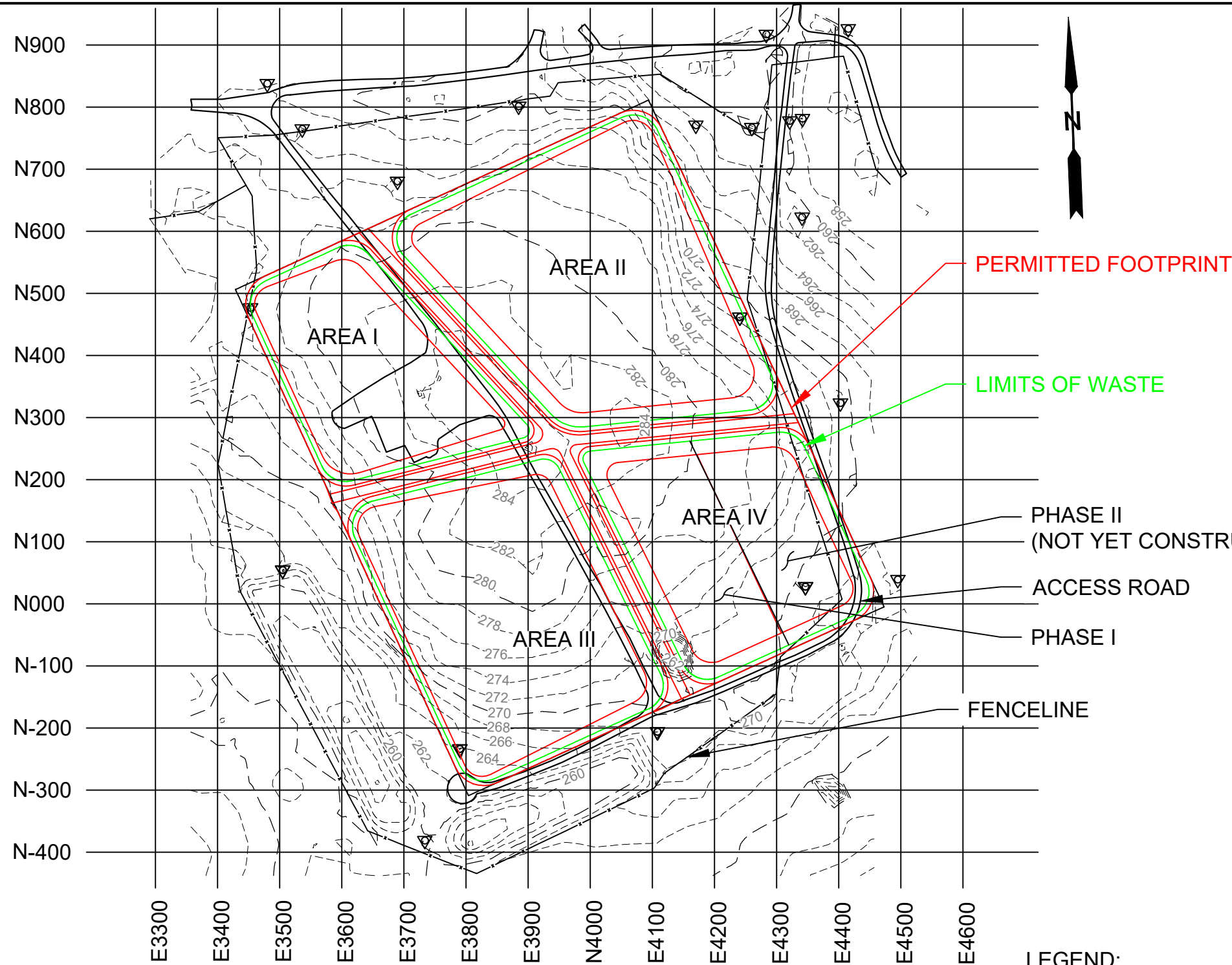
Attachments

			c) Current status of corrective actions: <u>Complete</u> d) Did corrective actions permanently solve the conditions (Y/N)? <u>Y</u> Explain briefly: <u>Ongoing maintenance and inspections.</u>	
10	22.423(b)(10) 22.522(a)(9) 22.619(b)(10)	Updated Financial Assurance documentation as required by Chapter 14. Note: Include copy of most recent financial assurance documentation as Attachment D. Also, include updated closure and post closure cost estimated as an attachment– recommend to use the Closure Costs and Post-closure Care Costs Worksheet located at ADEQ - Solid Waste - Technical Branch Home Page Specific links to the worksheets: http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/closure_costs_worksheet.xlsx and http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/post_closure_care_costs_worksheet.xlsx . Show detailed calculations of cost items in tabular format with specific item breakdowns. Also, show source of unit cost information and/or inflationary factor adjustments – use ADEQ factors where applicable. If updated unit cost information is used instead of inflationary factors, show the source of unit cost information. Confirm estimates are based on largest area ever requiring final cover.	a) Size of the facility property under current permit? <u>14.12</u> acres b) Size of actual permitted disposal area? <u>14.12</u> acres c) What is the current total permitted disposal area that contains disposed waste but is not certified closed? <u>12.78</u> acres d) Updated closure cost estimate amount: \$ <u>1,557,732</u> e) Is the closure cost estimate based on the largest area ever requiring closure (Y/N)? <u>Y</u> f) Is the existing closure financial assurance adequate for acreage not yet certified closed (Y/N)? <u>Y</u> g) Updated post closure care cost estimate amount: \$ <u>604,093</u> h) Is the existing post closure care financial assurance adequate for all permitted areas (Y/N)? <u>Y</u> i) Is the financial assurance mechanism a trust fund (Y/N)? <u>N</u> j) Are the sources of information for updated unit cost line items shown on the cost estimate calculations (Y/N)? <u>N/A</u> k) Do the unit cost items for soil cover material include actual third party cost of materials and labor (Y/N)? <u>Y</u> <u>These 2025 costs were calculated as shown in Attachment D and the 2025 costs were priced using off-site sourced materials with volume calculated to cover the entire landfill, and therefore, a soil balance of the active working area is not required.</u>	D
11	22.423(b)(11) 22.522(a)(10) 22.619(b)(11)	Revised or updated facility Closure Plan in accordance with Chapter 13. Note: Provide updated Closure Plan as Attachment E if facility obtained a permit modification during the reporting period that affects the closure and/or post closure care.	a) Was an updated Closure Plan required during this reporting period (Y/N)? <u>N</u> b) Is an updated Closure Plan attached herein (Y/N)? <u>N</u> (Attachment E not needed).	
12	22.423(b)(12) 22.522(a)(11) 22.619(b)(12)	Other items that affect compliance. Note: Include an ADEQ enforcement activity summary (solid waste, water, air, hazardous waste related) and , status of operating and permit fees. Also, include brief narrative concerning groundwater monitoring reports, landfill gas, leachate recirculation, alternate daily cover, etc...	a) Are there current ADEQ enforcement actions (Y/N)? <u>Y</u> b) Summary of enforcement actions: <u>The landfill is included in a plant-wide response to an order under jurisdiction of the Hazardous Waste Division.</u> c) Are operating and permit fees payments up-to-date (Y/N) ? <u>Y</u> If not explain: _____ _____ Additional Information: d) Does the facility monitor groundwater (Y/N)? <u>Y</u> If so, is it detection monitoring or assessment monitoring?:	

Attachment B

Revised Updated Drawings

L:\DCS\PROJECTS\ENV\ALB_MAGNOLIA_2026_RADDSU_60785185\900_CAD_GIS\910_CAD\SURFACE\ALBEMARLE_SPLF.DWG - Existing Conditions - 8/20/2026 1:42 PM



EXISTING CONDITIONS PLAN

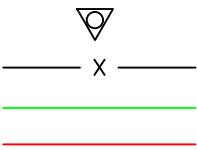


SCALE: 1" = 200'

SCALE: 1" = 200'

LEGEND:

MONITORING WELL
CHAIN LINK FENCE
LIMITS OF WASTE
PERMITTED FOOTPRINT



NOTES:

- EXISTING CONDITIONS BASED UPON TOPOGRAPHIC SURVEY PERFORMED BY LANDPOINT AND JOSHUA G. HAZEN, PLS NO. 1851 PERFORMED ON MAY 29, 2026
- PERMITTED WASTE AREA AND VOLUMES WERE DETERMINED USING THE PERMITTED LANDFILL DESIGN DRAWINGS SUBMITTED IN THE DECEMBER 2012 ADMINISTRATIVE PERMIT MODIFICATION TO THE ADEQ, ADEQ ELECTRONIC FILE NO. 63636

SPLF DESIGN QUANTITIES - 2025 AUTOCAD CIVIL 3D CALCULATIONS

TOTAL LANDFILL AREA = 14.12 ACRES
FINAL COVER MATERIAL (2.5') = 52,597.36 CY
(TOP OF FINAL COVER TO BOTTOM OF WASTE)= 153,277.60 CY

SPLF WASTE QUANTITIES - 2026 AUTOCAD CIVIL 3D CALCULATIONS

EXISTING WASTE PLACED IN LANDFILL TO DATE = 78,350.63 CY
REMAINING WASTE/REMAINING AIR SPACE = 24,281.25 CY
PERMITTED TOTAL WASTE VOLUME= 100,680.24 CY

BENCHMARK COORDINATE TABLE

PT NO	NORTHING	EASTING	ELEVATION
BM-3	1498155.12	942300.14	255.24
BM-4	1498155.21	942305.44	255.20
BM-5	1498583.78	940882.83	278.69

SPLF AREA CALCULATIONS

AREA #	AREA (ACRES)	PERMITTED WASTE VOLUME (CY)
1	2.48	15696.12
2	4.64	36861.68
3	4.02	24300.61
4 (PHASE I)	1.64	13224.69
4 (PHASE II)	1.34	10597.14
TOTAL	14.12	100680.24

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REV	DESCRIPTION OF REVISION	BY	DATE

AECOM

8555 United Plaza Blvd., Suite 300
Baton Rouge, Louisiana 70809
225-922-5700

REFERENCE DRAWINGS

SCALE	AS SHOWN
DESIGNED	
DRAWN	PD
CHECKED	CS
PEER REVIEWED	
DATE	06/26/26

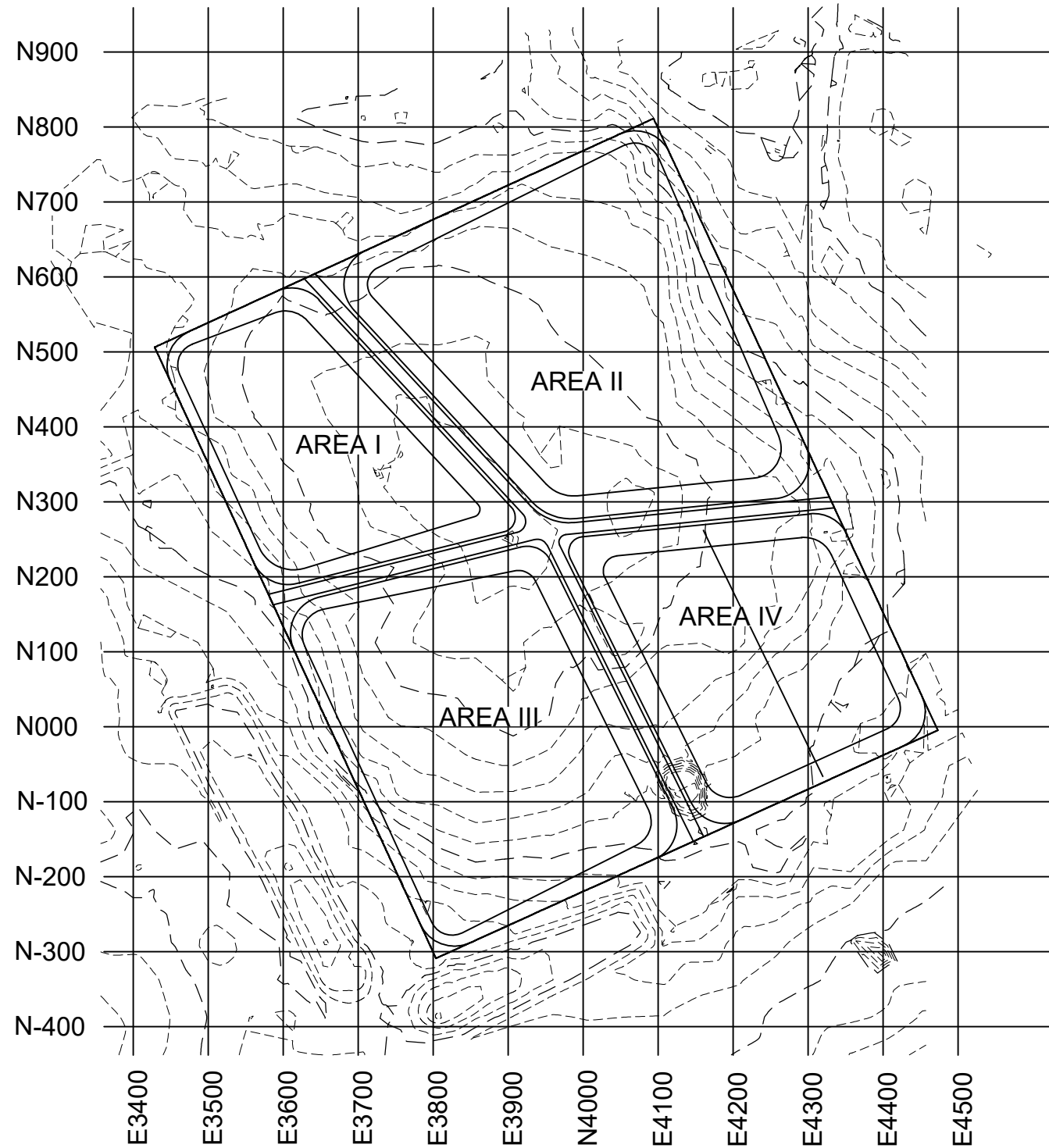
ALBEMARLE SOUTH PLAN
MAGNOLIA, ARKANSAS
2025 ANNUAL ENGINEERING INSPECTION REPORT

SOUTH PLANT LANDFILL
EXISTING CONDITIONS
DECEMBER 31, 2024 THRU MAY 29, 2026

REVISION

△	
PROJECT	60785185
FIGURE	1

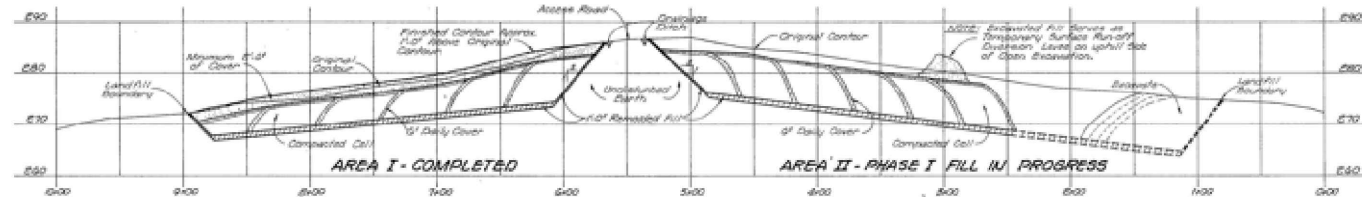
L:\DCS\PROJECTS\ENV\ALB_MAGNOLIA_2026_RADDS\60785185_900_CAD_GIS\910_CAD\SURFACE_ALBEMARLE_SPLF.DWG -- Final Cover Plan -- 8/20/2026 1:43 PM



FINAL COVER PLAN
SCALE: 1" = 200'

NOTES:

1. FINAL COVER PLAN, FINISH GRADE PLAN, AND TYPICAL SECTION WERE TAKEN FROM 1981 ETHYL CORPORATION SANITARY LANDFILL PRELIMINARY PACKAGE



BENCHMARK COORDINATE TABLE

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SCALE: 1" = 200'

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AECOM

8555 United Plaza Blvd., Suite 300
Baton Rouge, Louisiana 70809
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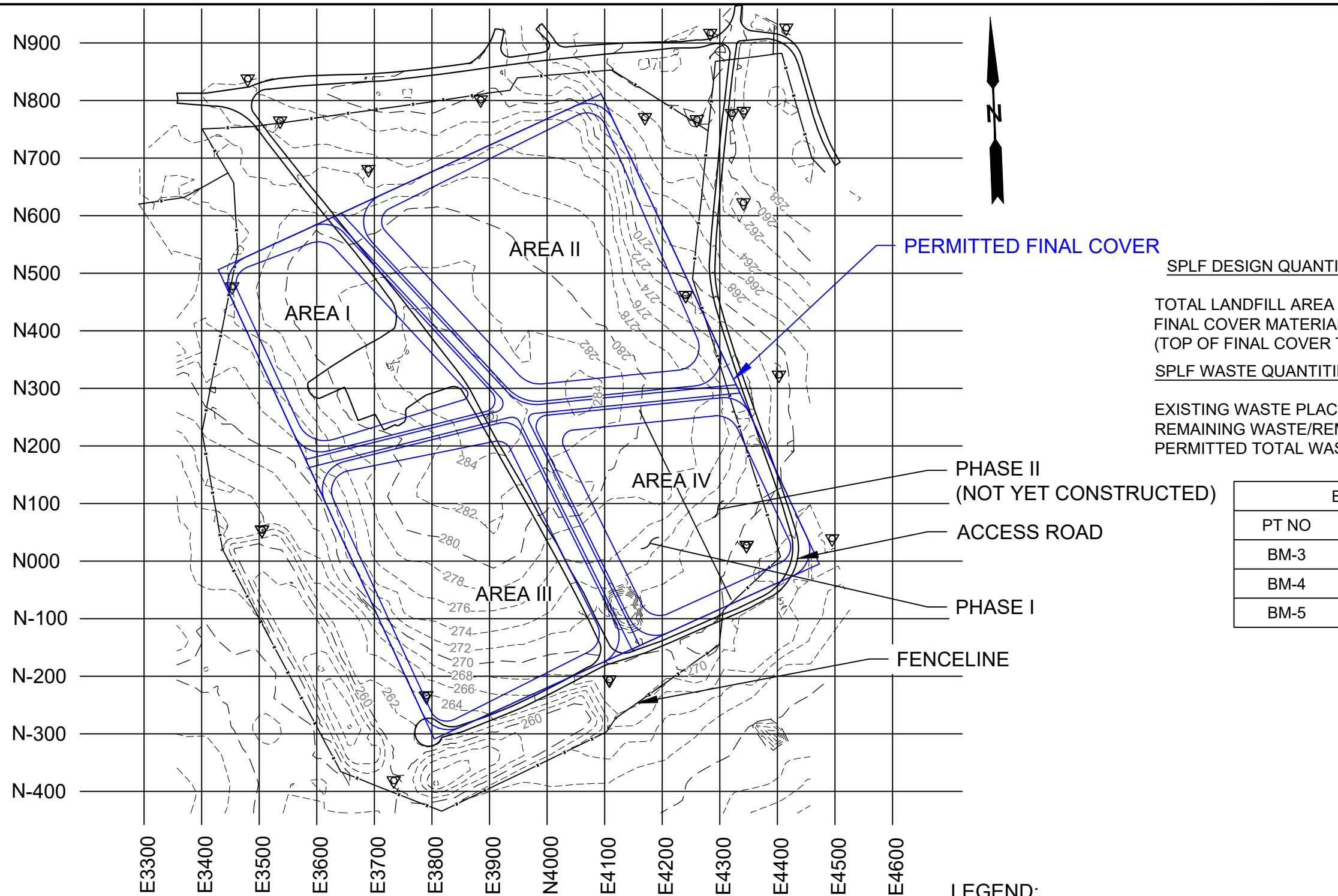
ALBEMARLE SOUTH PLAN
MAGNOLIA, ARKANSAS
2025 ANNUAL ENGINEERING INSPECTION REPORT

SOUTH PLANT LANDFILL
FINAL COVER PLAN
DECEMBER 31, 2024 THRU MAY 29, 2026

REVISION

PROJECT	6078185
FIGURE	2

L:\DCS\PROJECTS\ENV\ALB_MAGNOLIA_2026_RADDSU_60785185\900_CAD_GIS\910_CAD\SURFACE\ALBEMARLE_SPLF.DWG - Existing Conditions & Final Cover - 8/20/2026 1:43 PM



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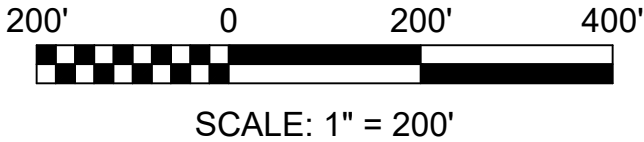
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LEGEND:

MONITORING WELL
CHAIN LINK FENCE
PERMITTED FINAL COVER



EXISTING CONDITIONS AND
FINAL COVER PLAN
SCALE: 1" = 200'



8555 United Plaza Blvd., Suite 300
Baton Rouge, Louisiana 70809
225-922-5700

REFERENCE DRAWINGS

SCALE
AS SHOWN
DESIGNED
DRAWN PD
CHECKED CS
PEER REVIEWED
DATE 06/26/26

ALBEMARLE SOUTH PLAN
MAGNOLIA, ARKANSAS
2025 ANNUAL ENGINEERING INSPECTION REPORT

SOUTH PLANT LANDFILL
EXISTING CONDITIONS AND PERMITTED FINAL COVER
MAY 29, 2026 TOPOGRAPHIC SURVEY

REVISION

PROJECT
60785185
FIGURE
3

REV	DESCRIPTION OF REVISION	BY	DATE
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Attachment D

Updated Financial Assurance

South Plant Landfill Closure Cost Estimate					
ITEM	Quantity	Unit	Unit Price	Amount	Source
Surface Preparation	16	acre	\$875	\$14,000	A
Clay Cover	70,000	yd ³	\$11	\$770,000	A
Soil Erosion Layer (topsoil)	30,000	yd ³	\$11	\$330,000	A
Equipment and Improvements Removal	1	each	\$2,500	\$2,500	A
Monitoring Well Maintenance and Repair (25% of 14)	3.5	each	\$8,000	\$28,000	B
Seeding/Fertilizing/Mulching	16	acre	\$500	\$8,000	A
Erosion Control (silt fences, drainage ditches)	3,000	ft	\$5	\$15,000	A
Surveying (final)	1	each	\$12,600	\$12,600	C
Initial Closure Cost				\$1,180,100	
Administrative (20%, includes QA/QC, reporting, etc)				\$236,020	
Final Closure Cost				\$1,416,120	
Contingency (10% Final Closure Cost)				\$141,612	
Grand Total Closure Costs				\$1,557,732	

Post Closure Care Annual Miscellaneous Repairs Cost Estimate					
ITEM	Quantity	Unit	Unit Price	Amount	Source
Routine Inspections	2	each	600	\$1,200	D
Maintenance of Improvements	1	each	2400	\$2,400	D
Maintenance of Vegetative Cover	16	acre	300	\$4,800	D
Total Annual Miscellaneous Costs				\$8,400	

Post Closure Care Annual Leachate Collection System Operation/Maintenance					
ITEM	Quantity	Unit	Unit Price	Amount	Source
Annual Maintenance/Repair	2,100	feet	0.30	\$630	D
Leachate Management	1,500,000	gallon	0.08	\$120,000	D
Sub Total Annual Post Closure Leachate System				\$120,630	

Post Closure Care Annual Monitoring Well System Operation/Maintenance					
ITEM	Quantity	Unit	Unit Price	Amount	Source
MW Replacement @ 25% of 14 MWs in 30 Years	2.50	well	7750	\$19,375	B
MW Maintenance/Repair	14	well	85	\$1,190	A
MW Sampling (Semi annually)	28	well	1820	\$50,960	A
MW Sample Analysis (Semi annually)	28	well	731	\$20,468	A
Surface Water Sampling	2	event	400	\$800	A
Post Closure Care Annual Monitoring Well System				\$92,793	

Total Post Closure Care Costs					
ITEM	Unit Cost	Years		Amount	Source
Annual Miscellaneous Repairs Cost Estimate	8400	2		\$16,800	D
Annual Leachate Collection System Operation/Maintenance	120630	2		\$241,260	D
Monitoring Well System Operation/Maintenance	92793	2		\$185,586	A
P&A 14 MWs	14 at \$1000	1		\$14,000	A
Initial Post Closure Cost				\$457,646	
Administrative Cost at 20%				\$91,529	
Final Post Closure Cost				\$549,175	
Contingency (10% of Final Post Closure Cost)				\$54,918	
Total Post Closure Care Costs				\$604,093	

Total Amount Required for Financial Assurance SPLF	
ITEM	Amount
Grand Total Closure Cost Estimate	\$1,557,732.00
Grand Total 2-Year Post Closure Care Cost Estimate	\$604,092.72
Total Required Financial Assurance	\$1,915,683.88

Cost estimates from following companies:

- A - AECOM
- B - Envirotech
- C - Landpoint
- D- Albemarle