Haley Griffith (adpce.ad)

Subject: RE: Craighead County Class 1 Landfill - Minor Permit Modification - 2025 Landfill Gas Collection System Expansion

From: McInnes, Colin <cmcinnes@wcgrp.com>
Sent: Friday, September 12, 2025 3:53 PM
To: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>
Cc: Angela Sparks <angela@ccswda.com>; Robert Hendrix <rhendrix@ccswda.com>; Anthony Almanza <aty@vitolbiomethane.com>
Subject: RE: Craighead County Class 1 Landfill - Minor Permit Modification - 2025 Landfill Gas Collection System Expansion

Richard,

Please find attached a letter with the additional information that you requested,

Colin McInnes

Colin McInnes, P.E.
Principal

Weaver Consultants Group
6420 Southwest Blvd. | Suite 206
Fort Worth, TX 76109
O: 817-735-9770 | F: 817-735-9775 | M: 979-220-1489
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Weaver Consultants Group

September 12, 2025
Project No. 9943-007-52-00

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

Re: Minor Permit Modification – Additional Information
2025 Landfill Gas Collection System Expansion
Craighead County SWDA, Permit No. 0254-S1-R4; AFIN: 16-00199
Craighead County, Arkansas

Dear Mr. Bennett:

The purpose of this modification to the Minor Permit Modification submitted on behalf of Craighead County Solid Waste Disposal Authority - the owner of Legacy Landfill - to provide additional information to the Arkansas Department of Environmental Quality (ADEQ) for the proposed expansion of the existing landfill gas (LFG) collection system at the Legacy Landfill (site).

Closure and Post Closure

During the expansion of the gas collection and control system the number of LFG extraction wells at the facility will increase from 57 to 100 extraction wells.

TABLE E ANNUAL MAINTENACNE/OPERATION OF GAS COLLECTION SYSTEM	
ITEM	AMOUNT
Capitol cost of System = 100 extraction wells at $5,750 = $575,000	
Operation and Maintenance (1/30 of Capitol Cost)	$19,167
TOTOAL ESTIAMTED ANNUAL GAS COLLECTION SYSTEM COSTS	$19,167

The Facilities required financial assurance for the major modification was $4,469,220.00. The Facility currently has $5,000,00.00 assigned to DEQ for financial assurance for the major modification. The increase in the financial insurance with the installation of this project is currently covered by the $5,000,000.00 that is currently assigned.

Extraction Well Work Plan

The locations for the new vertical LFG extraction wells are shown in Drawing 1 of the previously submitted project drawings. The LFG extraction wells will be installed in vertical borings drilled within the waste. The boring for the LFG extraction wells will be drilled to within approximately 10 feet of the bottom of waste. The LFG extraction well casings will be fabricated from polyvinyl chloride (PVC) pipe. The bottom portion of the well casings will be perforated with evenly spaced holes along the pipe. The length of the perforated section will vary, depending on the location of the LFG extraction well and the subsequent depth of refuse. The annulus around the perforated section of pipe will be backfilled with 1-inch to 3-inch diameter gravel. The gravel fill will be extended to approximately 2 feet above the top of the screen perforation interval. Above the gravel backfill, a geotextile isolation ring, and a borehole seal will be installed to prevent the infiltration of fines into the annular spaces of the gravel. The remaining well bore will be backfilled with select backfill existing grade. Compacted soil backfill was then mounded to slope away from the LFG extraction well to compensate for backfill settlement and to prevent ponding at the LFG extraction well location.

Sincerely,
Weaver Consultants Group, LLC

Colin G. McInnes, P.E.
Principal

Attachment 1: Financial Assurance Dated May 21, 2025

cc: Angela Sparks, CEO Craighead County SWDA (e-copy only)
Robert D Hendrix, Craighead County SWDA (e-copy only)
Anthony Almanza, VBM Legacy, LLC (e-copy only)

ATTACHMENT 1

FINANCIAL ASSURANCE

CRAIGHEAD COUNTY SOLID WASTE DISPOSAL AUTHORITY
"LEGACY LANDFILL"
P O Box 16777
Jonesboro, AR 72403
(870) 972-6353

May 21, 2025

Arkansas Department of Energy & Environment,
Division of Environmental Quality
ATTENTION; SUSAN SPEAKE
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill – Required Financial Assurance for Major Permit Modification Application

Dear Susan:

Listed below is information related to the satisfying financial assurance requirements in Rule 22.1402-22.1406 (40 CFR §258.70) for the Craighead County Solid Waste Disposal Authority, "Legacy Landfill", Class 1 Landfill Major Permit Modification:

1. **Issuing Institution:**
   Name: First Community Bank
   Address: 630 Southwest Drive, Jonesboro, AR 72401
   Contact Person/Title: James McMasters
   Contact Phone Number: 870-376-7112
   Certificate of Deposit #: [redacted]
   Certificate of Deposit Effective Date: 2/14/2024 24 months
   Amount of Funds secured by this CD: $3,000,000.00
   Certificate of Deposit #: [redacted]
   Certificate of Deposit Effective Date: 2/14/2024 18 months
   Amount of Funds secured by this CD: $2,000,000.00

2. **Solid Waste Facility(ies) covered by this Letter of Credit:**
   Name: Craighead County Solid Waste Disposal Authority "Legacy Landfill"
   Address: PO Box 16777, 238 County Road 476, Jonesboro, Arkansas 72403
   Contact Person/Title: Angela L Sparks, Chief Executive Officer
   Contact Phone Number: 870-972-6353 Extension 5
   Permit Number: 0254-S1-R4 (Major Modification)
   AFIN: 16-00199

Information for financial assurance requirements for Major Permit Modification
Closure Cost Estimate: $3,925,920 (per Olsson, 5/2/2025)
Post Closure Cost Estimate: $2,716,500 x .20 = $543,300.00 (Per Olsson, 5/2/2025)
Corrective Action (if required): N/A

*Total requirement for Major Permit Modification: $4,469,220.00
*Total Assigned Certificates of Deposit = $5,000,000.00 (Assignments of Certificates of Deposit to the Arkansas Department of Energy and Environment, Division of Environmental Quality are enclosed.)

These Certificates of Deposit are in addition to the financial assurance requirements for current permits which are covered by a Letter of Credit.

Should you have any questions, please advise.

Sincerely,

CRAIGHEAD COUNTY SOLID WASTE DISPOSAL AUTHORITY
"LEGACY LANDFILL"

Angela L. Sparks, Chief Executive Officer
angela@ccswda.com

Enclosures

ASSIGNMENT OF CERTIFICATE OF DEPOSIT TO THE ARKANSAS DEPARTMENT ENERGY AND ENVIRONMENT, DIVISION OF ENVIRONMENTAL QUALITY

Certificate of Deposit No. [redacted] issued by

First Community Bank in the amount of
Name of Financial Institution

Three Million and no/100 dollars ($ 3,000,000.00) is hereby assigned, transferred to, and pledged with the Arkansas Department Energy and Environment, Division of Environmental Quality

(DEQ) by Craighead County Solid Waste Disposal Authority.
Name of Principal

The Certificate shall be automatically renewed at intervals designated by the above named Financial Institution. DEQ will be notified after each renewal.

The Certificate is not and will not be considered as, or used as, collateral for any other purpose by the undersigned Principal or Financial Institution.

The amount of the Certificate shall not exceed the maximum insurable amount as determined by the FDIC or the FSLIC.

All interest accrued or accruing hereafter on said Certificate is to remain the property of the Principal. The Financial Institution may direct the interest to another account held by the Principal.

This assignment is made as, and shall constitute, collateral bond for the faithful performance of the Principal's obligations for remediation per A.C.A. § 8-6-1601 et seq.

The Certificate of Deposit shall be payable in part or in full to the DEQ upon demand with a notice of bond forfeiture signed by the Chief Administrator of DEQ.

For any and all disputes arising out of, in connection with, or relating to these Certificates of Deposit, the Issuing Bank or Institution expressly agree and consent that the exclusive jurisdiction and venue for any proceeding shall be in the Pulaski County Circuit Court for the State of Arkansas in Little Rock, Arkansas, and the Issuing Bank or Institution waive any argument that the venue in such a forum is not convenient and any rights under any Federal or State law establishing jurisdiction or venue in another forum.

This assignment shall remain in full force and effect throughout all renewals until released in writing by the DEQ's Office of Land Resources.

Dated this 21ST day of May, 2025

Principal	Financial Institution
Craighead County Solid Waste Disposal Authority	First Community Bank
By Angela L Sparks Signature of Principal Official	By Signature of Institution Official
Angela L. Sparks, Chief Executive Officer Name and Title of Principal Official	Allen Williams EVP Regional President Name and Title of Principal Official
PO Box 16777, Jonesboro, AR 72403 Address of Principal	630 Southwest Dr Jonesboro AR 72401 Address of Institution
870-972-6353 Ext 5 Telephone No. of Principal	870-376-7184 Telephone No. of Institution

Acknowledgement:

State of Arkansas

County of Craighead

On this the 21st day of May, 2025, before me, Katherine Tippy, the undersigned notary, personally appeared J. Allen Williams known to (or satisfactorily proven) to be the person whose name is subscribed to the within instrument and acknowledged that he executed the same for the purposes therein contained.

Name(s) of signer(s)

name(s) is/are

they

In witness whereof I hereunto set my hand and official seal.



Katherine Tippy
Notary Public

My Commission expires: 4.22.29

ASSIGNMENT OF CERTIFICATE OF DEPOSIT TO THE ARKANSAS DEPARTMENT ENERGY AND ENVIRONMENT, DIVISION OF ENVIRONMENTAL QUALITY

Certificate of Deposit No. [redacted] issued by

First Community Bank
Name of Financial Institution
in the amount of

Two Million and no/100 dollars ($ 2,000,000.00) is hereby assigned, transferred to, and pledged with the Arkansas Department Energy and Environment, Division of Environmental Quality

(DEQ) by Craighead County Solid Waste Disposal Authority
Name of Principal
.

The Certificate shall be automatically renewed at intervals designated by the above named Financial Institution. DEQ will be notified after each renewal.

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This assignment shall remain in full force and effect throughout all renewals until released in writing by the DEQ's Office of Land Resources.

Dated this 21 ST day of May, 2025

Craighead County Solid Waste Disposal Authority Principal	First Community Bank Financial Institution
By Angela L Sparks Signature of Principal Official	By Signature of Institution Official
Angela L. Sparks, Chief Executive Officer Name and Title of Principal Official	Allen Williams SVP Regional President Name and Title of Principal Official
PO Box 16777, Jonesboro, AR 72403 Address of Principal	630 Southwest Dr Jonesboro AR 72401 Address of Institution
870-972-6353 Ext 5 Telephone No. of Principal	870-376-7184 Telephone No. of Institution

Acknowledgement:

State of Arkansas

County of Craighead

On this the 21st day of May, 2025, before me, **Katherine Tippy**, the undersigned notary, personally appeared **J. Allen Williams** known to (or satisfactorily *Name(s) of signer(s)*

proven) to be the person whose name is subscribed to the within instrument and *name(s) is/are*

acknowledged that he executed the same for the purposes therein contained. *they*

In witness whereof I hereunto set my hand and official seal.

KATHERINE TIPPY #12707456 NOTARY PUBLIC MY COM. EXP: 04/22/29 CRAIGHEAD COUNTY, ARKANSAS

Katherine Tippy

Notary Public

My Commission expires: 4.22.29