Haley Griffith (adpce.ad)

From: Andrew Pruitt <apruitt@olsson.com>
Sent: Friday, November 6, 2026 12:04 PM
To: EE GW Reports
Cc: Melissa Vaught; Angela Sparks; David Passmore
Subject: Alternate Source Demonstration for First Half 2026 SSIs, Craighead County Legacy Class 1 Landfill, Permit No. 0254-S1-R5
Attachments: 26-11-06_ENV_TM DEQ 1H2026 ASD for SSI Craighead County Landfill.pdf

CAUTION: External Email

Good afternoon. On behalf of the Craighead County Legacy Landfill, please find the attached alternate source demonstration for statistically significant increases identified during the first half 2026 monitoring period.

Please contact me or Melissa Vaught if you have any questions with this submittal.

Thank you,

Andrew

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MEMO

To:	Arkansas Department of Energy and Environment, Department of Environmental Quality Attn: Groundwater Branch Manager 5301 Northshore Drive North Little Rock, AR 72116
From:	Andrew Pruitt, PG and Melissa Vaught, PE
RE:	Alternate Source Demonstration for Statistically Significant Increases First Half of 2026 Monitoring Period, Craighead County Class 1 Landfill Permit No. 0254-S1-R5, AFIN: 16-00199
Date:	November 6, 2026
Project #:	B24-01259

On behalf of the Craighead County Solid Waste Disposal Authority, Olsson is submitting this alternate source demonstration (ASD) to the Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) for confirmed statistically significant increases (SSIs) identified during the first half of 2026 groundwater monitoring period for the Craighead County Class 1 Landfill.

As reported in the first half of 2026 groundwater monitoring report (posted to the DEQ database on August 20, 2026), a confirmed SSI was identified for TDS at background well MW-17R. A potentiometric surface map showing the location of this well relative to the direction of groundwater flow and the landfill is shown in Figure 1 (Attachment 1). The measured value of the confirmed SSI identified is summarized in Table 1 (Attachment 2). Analytical results for sampling performed during the first half of 2026 was submitted to DEQ directly from Pace Analytical National of Mt. Juliet, Tennessee (posted to the DEQ database on August 20, 2026).

Pursuant to Title 8 of the Code of Arkansas Rules Part 60 (8 CAR 60) §60.1204(c)(3), this memorandum presents evidence for an alternate source demonstration (ASD) that the SSI is due to a source other than the landfill, the result of offsite influence, and/or natural fluctuations in groundwater quality.

ASD for MW-17R

The SSI for TDS at MW-17R, as summarized in Table 1 (Attachment 2), was detected at a groundwater well which monitors background water quality due to its hydraulically upgradient position relative to the landfill as shown on Figure 1. As such, the SSI for TDS at MW-17R is the result of natural fluctuations in groundwater quality and/or off-site influence.

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CONCLUSIONS

In consideration of the information presented in this memorandum, Olsson concludes that:

- The SSI for TDS at background well MW-17R is the result of offsite influence and/or natural fluctuations in groundwater quality.

This memorandum serves as the ASD prepared in accordance with §60.1204(c)(3) and supports the position that the confirmed SSI for TDS at background well MW-17R identified during the first half of 2026 are not due to a release from the landfill. Therefore, it is recommended that the landfill continue with detection monitoring in accordance with 8 CAR 60 and the landfill's permit.

If you have questions or comments regarding this memorandum, please do not hesitate to contact Melissa Vaught, PE, at (479) 443-3404 or Andrew Pruitt, PG, at (501) 225-7779.

Attachments

PROFESSIONAL GEOLOGIST'S CERTIFICATION

With this certification, I certify that I am an Arkansas-registered professional geologist and a qualified groundwater scientist as defined in Arkansas Pollution Control and Ecology Commission Rule Title 8 of the Code of Arkansas Rules (CAR) Part 60 (8 CAR Part 60), §60.1201(f), that this letter has been prepared under my direction, that the findings are accurate to the best of my knowledge, and that the alternate source demonstration described herein meets the requirements of §60.1204(c)(3) of 8 CAR Part 60.



Andrew J. Pruitt, Arkansas PG #3029

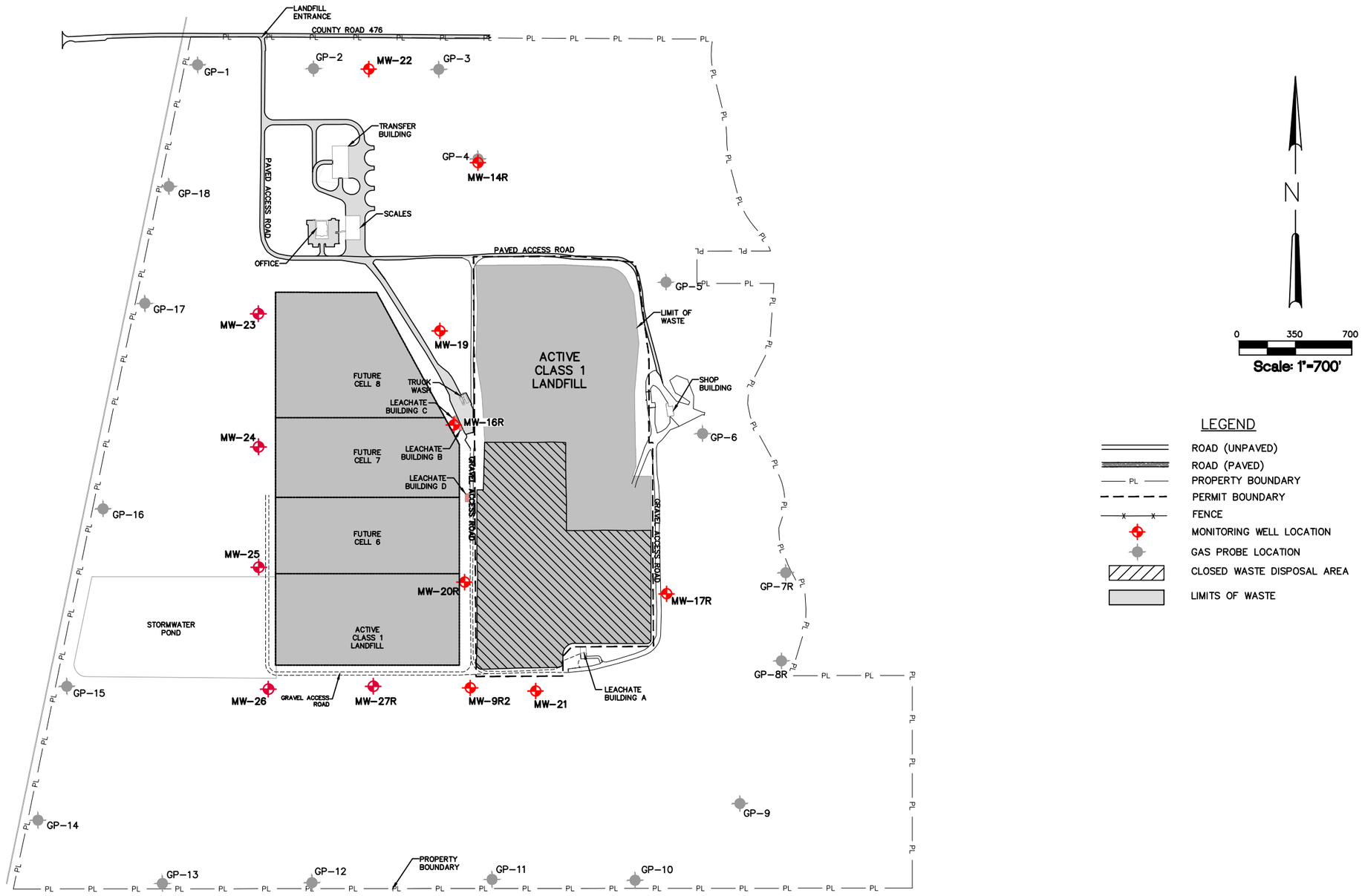
11/6/2026

Date

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ATTACHMENT 1
FIGURE



F:\2024\01001-01500\024-01259-BV40-Design\Exhibits\1H2026\CCLF REPORT\024-01259-B 1H2026 CCF REPORT FIGURE 1.dwg
DATE: Apr 30, 2026 12:00pm USER: jtorres

PROJECT NO:	024-01259-B
DRAWN BY:	JT
DATE:	04.30.2026

Figure 1. Site Map Legacy Class 1 landfill.

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ATTACHMENT 2
TABLE

Table 1. Summary of SSIs, first half of 2026.

Well ID	Parameter	Prediction Limit (mg/L)	May 2026 Sampling Result (mg/L)	August 2026 Verification Result (mg/L)	SSI Confirmed?
MW-17R (upgradient)	TOC	1.319	1.64	0.974 J	No
MW-17R (upgradient)	TDS	394.8	484	N/A[a]	Yes[a]

Notes:

a. "J" flag indicates the parameter was detected below the laboratory reporting detection limit; the report value is an estimate.

b. SSI was previously confirmed; verification sampling was not performed.