February 5, 2026

Ms. Angela L. Sparks, Chief Executive Director (angela@ccswda.com)
Craighead County Solid Waste Disposal Authority (SWDA)
P.O. Box 16777, Jonesboro, AR 72403-6777

RE: Notice of Deficiency for Cell 5 Construction Quality Assurance Certification Report
Craighead County Solid Waste Disposal Authority (SWDA) Class 1 Landfill
Permit Tracking Number: 0254-S1-R5; AFIN: 16-00199
Cross Reference Identifier(s):
0254-S1-R5_Legacy Landfill CQA Report for Cell 5_20260115.pdf
0254-S1-R5_Revised Legacy Landfill CQA Report for Cell 5_20260126.pdf

Dear Ms. Sparks,

The Division of Environmental Quality Office of Land Resources (DEQ) has reviewed the Cell 5 Construction Quality Assurance (CQA) certification report submitted on December 15, 2026, for the Craighead County Solid Waste Disposal Authority Class 1 Landfill. After review, the deficiencies listed below were identified.

1. Section 5.2.2 Construction Procedures: It appears the protective cover sample failed the one-inch sieve test (Sample ID: PCL) required by the approved CQA Plan (Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf"). Please provide justification that the material meets the CQA Plan design specifications and note it as a deviation.

2. Appendix M Geomembrane – Conformance Testing Results:

    a. Please provide justification for using ASTM Method D5199 for thickness and not D5994 as required by the approved CQA Plan.

    b. It appears that Geomembrane Sample Number 3119010171 has an average thickness of 59 mils when the approved CQA requires a value of at least 60 mils. Was this material used? If so, please provide justification that the material meets the CQA Plan design specifications and note it as a deviation.

3. Appendix V Protective Cover and Washed Gravel – Test Results:

    a. There is one sample of gravel for the leachate sump and one for the leachate trench but no preconstruction sample. Please explain this deviation from the approved CQA (Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf).

    b. It appears that the leachate sump gravel and leachate trench gravel did not pass the one quarter-inch sieve requirement specified in the approved CQA Plan because the submitted data sheets do not include results for the one quarter-inch sieve analysis. Please provide information that demonstrates

the gravel used to construct the sump and the trench meets the specification in the approved CQA Plan.

Please address the deficiencies identified above and submit an updated construction certification report to DEQ within thirty (30) calendar days from the receipt of this letter. Should you have any questions or concerns, please feel free to contact me at (501) 682-0861 or email at Richard.Bennett@arkansas gov.

Sincerely,

Richard Bennett

Richard Bennett, PE
Engineer, Division of Environmental Quality

cc: DEQ - Banic, Hurt, Krou
Paul Crawford, PE, PG, Olson (pcrawford@olsson.com)