DIVISION OF
ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR
Shane E. Khoury
SECRETARY

August 12, 2025

Angela Sparks, Chief Financial Officer (angela@ccswda.com)
Craighead County Solid Waste Disposal Authority
PO Box 16777, Jonesboro, Arkansas 72403

RE: NOTICE OF FINAL PERMITTING DECISION
Solid Waste Permit Number: 0254-S1-R5
AFIN: 16-00199

The Director has made a final permitting decision for the above referenced solid waste permit. The Director's decision was made upon consideration of the completed application, public comments on record, if any, and any other materials provided by law or regulation applicable to the application. The Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) has issued a final permit authorizing Craighead County Solid Waste Disposal Authority for the construction, operation, and maintenance of the Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill located at 238 CR 476, Jonesboro, Arkansas 72404 pursuant to the Arkansas Pollution Control and Ecology Commission (PC&EC) 8 CAR pt. 60.

The final permit, Statement of Basis for the decision, and Response to Comments, if any, are available on DEQ's website at the following web address:
https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/SolidWaste/0254-S1-R5.pdf

This notice of final permitting decision is being mailed to Craighead County Solid Waste Disposal Authority and those persons who submitted public comments on the record as required by the PC&EC 8 CAR pt. 11. This notice of final permitting decision including the certificate of service is part of the permitting record and is available through the website above. Craighead County Solid Waste Disposal Authority and any person who submitted public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decision as provided under Subpart 6 of the PC&EC 8 CAR pt. 11.

CERTIFICATE OF SERVICE

I, Haley Griffith, hereby certify that a copy of this notice of permitting decision has been mailed to Angela Sparks at PO Box 16777, Jonesboro, Arkansas 72403 on this 12th day of August. 2025.

Haley Griffith
Signature of person mailing this notice

August 12, 2025

Angela Sparks, Chief Financial Officer (angela@ccswda.com)
Craighead County Solid Waste Disposal Authority
PO Box 16777, Jonesboro, Arkansas 72403

Re: Issuance of Final Permit Decision for a Class 1 Landfill
Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill
Solid Waste Permit Number: 0254-S1-R5; AFIN: 16-00199
Cross Reference Document Identifier (Doc ID):
0254-S1-R4_Comments from Melissa Vaught_20250624.pdf
0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf
0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf

Dear Ms. Sparks:

The Division of Environmental Quality Office of Land Resources (DEQ) has made a final permitting decision to issue a permit authorizing the construction, operation, and maintenance of the Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill solid waste facility as described in the permit application dated December 2, 2025, and supplemental information contained within the administrative record. A public notice detailing DEQ's draft permitting decision was published in *The Jonesboro Sun* on June 11, 2025, and the public comment period ended July 11, 2025. Comments were submitted by Olsson on behalf of Craighead County Solid Waste Disposal Authority. Craighead County Solid Waste Disposal Authority and any person who submitted public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decision as provided under Subchapter 6 of 8 CAR pt. 11.

Please find enclosed the final permit Responsiveness Summary, final permit 0254-S1-R5, and the Permit Summary and Rationale/Statement of Basis. Should you have any questions or wish to discuss this permit, feel free to contact Richard Bennett, Solid Waste Engineer at (501) 682-0861 or Richard.Bennett@arkansas.gov.

Sincerely,

Bryan Leamons

Bryan Leamons
Deputy Director, Office of Land Resources
Division of Environmental Quality

Enclosure: Responsiveness Summary
Final Permit
Permit Application Summary and Rationale (Statement of Basis)

cc: DEQ - Hurt, Banic, Sadler, Speake, Krou, Davenport.
Melissa M. Vaught, P.E., Olsson (mvaught@olsson.com)

Division of Environmental Quality

RESPONSIVENESS SUMMARY

Final Permitting Decision Regarding

Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill
Jonesboro, Arkansas

8 Code of Arkansas Regulations Part 60
0254-S1-R5

The Division of Environmental Quality (DEQ) public noticed the intent to approve a draft Solid Waste Permit (Permit 0254-S1-R5) to Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill on 16-00199. During the comment period ADEQ received comments on behalf of Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill from Meliss Vaught of Olsson. All comments received are detailed below with the appropriate DEQ response.

Comment #1

The permitted landfill disposal area did not increase and should remain at 297 acres. The acreage appears multiple places in the draft.

Response to Comment #1

The DEQ agrees and has revised the permit.

Comment #2

General condition #20 – The site is approved to use degradable polyethylene film (DIN 7540) as noted in the permit application. Please note in this permit condition.

Response to Comment #2

The DEQ agrees and has revised the permit.

Comment #3

In the first paragraph, the initial submittal was made on ePortal on December 2, 2024.

Response to Comment #3

The DEQ agrees and has revised the permit.

Comment #4

Site specific conditions #9 and #11, the landfill gas monitoring plan and leachate collection plan were both revised with the April 29, 2025 response to comments submittal.

Response to Comment #4

The DEQ agrees and has revised the permit.

Comment #5

General condition #9 appears to be the same as site specific condition #15.

Response to Comment #5

The DEQ agrees and has revised the permit to remove the duplicate site specific condition #15.

End of Responsiveness Summary

ATTACHMENT

Responsiveness Summary – Comments Received

Haley Griffith (adpce.ad)

Subject: RE: Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill - Draft Permitting Decision for a Class 1 Landfill

From: Melissa Vaught <mvaught@olsson.com>
Sent: Tuesday, June 24, 2025 8:51 AM
To: Richard Bennett (adpce.ad) <richard.bennett@arkansas.gov>
Cc: Paul Crawford <pcrawford@olsson.com>; Robert Hendrix <rhendrix@ccswda.com>; Angela Sparks <angela@ccswda.com>; David Passmore <david@ccswda.com>
Subject: RE: Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill - Draft Permitting Decision for a Class 1 Landfill

Richard – As discussed, attached and below is a summary of comments on the draft permit.

- The permitted landfill disposal area did not increase and should remain at 297 acres. The acreage appears multiple places in the draft.
- General condition #20 – The site is approved to use degradable polyethylene film (DIN 7540) as noted in the permit application. Please note in this permit condition.
- Other minor comments:
  - In the first paragraph, the initial submittal was made on ePortal on December 2, 2024.
  - Site specific conditions #9 and #11, the landfill gas monitoring plan and leachate collection plan were both revised with the April 29, 2025 response to comments submittal.
  - General condition #9 appears to be the same as site specific condition #15.

If you have questions or we need to discuss further, please let me know.

Thank you,

Melissa Vaught, P.E.
C 210.219.2335

3537 N. Steele Blvd, Suite 310
Fayetteville, AR 72703
O 479.443.3404

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From: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>
Sent: Monday, June 9, 2025 9:36 AM
To: angela@ccswda.com
Cc: Melissa Vaught <mvaught@olsson.com>; Charles Hurt (adpce.ad) <Charles.Hurt@arkansas.gov>; Greg Banic (adpce.ad) <Greg.Banic@arkansas.gov>; Bill Sadler (adpce.ad) <Bill.R.Sadler@arkansas.gov>; Susan Speake (adpce.ad) <Susan.Speake@arkansas.gov>; Christopher Krou (adpce.ad) <Christopher.Krou@arkansas.gov>
Subject: Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill - Draft Permitting Decision for a Class 1 Landfill

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This message came from outside your organization. Please take care when clicking links or opening attachments. When in doubt, use the Report Phish button or contact IT to have the message analyzed.

Dear Ms. Sparks,

Please find attached to this email DEQ's approval of the draft permit reflecting the recent permit modification request to expand the landfill. Please provide proof of public notice and payment for said notice to DEQ. If you have any questions please feel free to contact me using the information provided below.

Respectfully,

Richard Bennett | Engineer, PE
Regulated Waste Operations
Division of Environmental Quality | Office of Land Resources
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0861 | e:richard.bennett@arkansas.gov

ARKANSAS
ENERGY & ENVIRONMENT

PERMIT
FOR THE CONSTRUCTION AND OPERATION OF A
SOLID WASTE DISPOSAL FACILITY
ISSUED BY
STATE OF ARKANSAS
DEPARTMENT OF ENERGY AND ENVIRONMENT
DIVISION OF ENVIRONMENTAL QUALITY
OFFICE OF LAND RESOURCES

Class 1 Landfill

Permit Number:	0254-S1-R5 (Draft)
AFIN:	16-00199
Effective Date:	[Effective Date]
Original Issuance Date:	May 4, 1990
Permit Owner & Address:	Craighead County Solid Waste Disposal Authority PO Box 16777 Jonesboro, Arkansas 72403
Facility Name & Address:	Class 1 Landfill 238 CR 476 Jonesboro, Arkansas 72404
Facility Location:	Section 32 and 33, Township 13 North, Range 4 East, Craighead County, Arkansas.
Permitted Landfill Disposal Area:	352 Acres
Property Total Area:	525 Acres
Permitted Disposal Capacity:	13,030,873 cubic yards
Financial Assurance:	Closure $3,925,920 Post-Closure $2,716,500 Total $6,642,420

December 2, 2024.

This permit authorizes the construction and operation of the Class 1 Landfill as set forth in the permit application submitted by Craighead County Solid Waste Disposal Authority, hereinafter called "owner" or "permittee," and received by the Division of Environmental Quality on December 12, 2024. The application was completed through a series of documents furnished by the permittee beginning on December 12, 2024 under Document ID (Doc ID) 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf and follow-up documents received on April 29, 2025 under Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf.

This permit is issued pursuant to the provisions of the Arkansas Solid Waste Management Act (Arkansas Code Annotated 8-6-201 et seq.) as amended, hereinafter called the "Act"; 8 CAR pt. 60, Arkansas Solid Waste Management Rules, as adopted by the Arkansas Pollution Control and Ecology Commission, hereinafter called "Part 60"; and all other applicable rules and regulations administered by the Division of Environmental Quality, hereinafter called "Division", and the following terms and conditions:

DESCRIPTION OF THIS PERMIT ACTION

This permit modification is a lateral expansion which increases the permitted disposal area by 55 acres and capacity by 6,025,600 cubic yards. On the effective date, this permit supersedes all prior solid waste permits issued by the Division for this Class 1 Permit.

SITE SPECIFIC CONDITIONS

1. This permit is for an approximately 520-acre facility with 352 acres permitted for waste disposal as indicated on the approved plans. The final grades and elevations shall not be exceeded at any time or in the anticipation of settlement and consolidation of the waste mass. This permit shall expire when the authorized fill elevations have been attained, and the facility is closed out in accordance with the provisions of Part 60.

    a. The Division shall be notified in writing upon construction of each disposal unit and upon facility closure in order that it may be inspected.

    b. Changes to or deviations from the construction and operation of the facility, as indicated on the approved facility plans indicated below, and on the approved permit application documentation, are not authorized unless approved in writing by the Division.

    c. The approved application document is filed under Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf, 54436, and 61939.

2. The total amount of financial assurance is $6,642,420. Of this amount $3,925,920 will be required for closure costs and $2,716,500 will be required for post-closure costs. This amount shall be subject to annual adjustments and may be increased at the discretion of the Division based upon the estimated cost for a third party to close the largest area requiring final cover during the active life of the facility and the cost for a third party to perform post-closure care.

    a. The instruments used to demonstrate financial assurance must be in accordance with the mechanisms set forth in 8 CAR § 60-1405(a) through (l) or as otherwise approved by the Division.

    b. Operations allowed under this permit shall not commence until all financial assurance is satisfactorily filed with the Division.

    c. A portion or all of the financial assurance may be held by the Division beyond the time of cessation of disposal operations at the site to ensure satisfactory closure and post closure care in accordance with Part 60.

3. This permit is for the disposal of all waste eligible for a Class 1 landfill including "special materials" as outlined in 8 CAR § 60-701 through 8 CAR § 60-708. Special Materials as identified in Part 60 do not require written authorization from the Division provided the materials that are identified, managed, and disposed according to provisions of the approved Hazardous and Unauthorized Waste Exclusion Plan under Doc IDs 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf and Subpart 7 of Part 60. Materials that are not specifically identified by the Special Materials section must be characterized by the generator of the waste prior to acceptance for disposal in the landfill in accordance with the facility's written Hazardous and Unauthorized Waste Exclusion Plan.

4. Each landfill waste cell shall be constructed in the sequence indicated in the approved plans and specifications.

5. The bottom liner system for any newly constructed waste cell must consist of a minimum 60 mil textured HDPE flexible membrane liner and a minimum of twenty-four inches of compacted clay exhibiting a maximum hydraulic conductivity of 1×10^{-7} centimeters per second (cm/s). Should the permittee desire to use any liner system other than a "composite liner" system as defined in 8 CAR § 60-424 (b), an Alternative Liner Demonstration in accordance with Division written guidance on alternative liner design and demonstration shall be submitted to and approved by the Division prior to initiation of construction of the alternative liner system. The Division reserves the right to require the installation of additional groundwater monitoring wells and make other changes to the permit in the event a request to use an alternative liner design is approved.

    a. Proper construction of the bottom clay liner of each waste cell shall be observed and certified to the Division by a Professional Engineer registered in the State of Arkansas in a Construction Certification Report in accordance with the approved Construction Quality Assurance (CQA) Plan whenever a cell is prepared for use.

    b. The Construction Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation, and extent of area(s) constructed for use; and test locations.

    c. The Certification Report shall be submitted to the Division at least fourteen (14) calendar days prior to waste placement in that cell.

6. The final cover system shall be designed according to the specifications set forth under Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf, which consists of (top to bottom):

    For the new cells:

    1) 6-inch vegetative soil layer.
    2) 12-inch protective cover soil layer;
    3) double-sided geocomposite drainage layer;
    4) 40-mil textured linear low-density polyethylene (LLDPE) geomembrane liner; and
    5) GCL; and

6) 12-inch-thick intermediate cover layer;

For the existing cells there are 2 options:

Geosynthetic Clay Liner (GCL) Option

1) 18-inch erosion layer.
2) double-sided geocomposite drainage layer;
3) 40-mil textured linear low-density polyethylene (LLDPE) geomembrane liner; and
4) GCL; and
5) 12-inch-thick intermediate cover layer;

Compacted Clay Option

1) 18-inch erosion layer.
2) double-sided geocomposite drainage layer;
3) 40-mil textured linear low-density polyethylene (LLDPE) geomembrane liner; and
4) 18-inch compacted clay with a maximum hydraulic conductivity of $1x10^{-7}$ cm/sec; and
5) 12-inch-thick intermediate cover layer;

7. The approved permit plans for the facility are as follows:

<u>Original Cell</u>	
Progression of Fill Plan	NEC drawings 15 through 27 Document I.D. #54436
Final Cover Detail	Drawing 2 of 14 Doc. #61939
Stormwater Management Plan	Drawing 3 of 14 Doc. ID# 61020
Gas Management Plan Details	Drawings 4 and 4A of 14 Doc. ID# 61020 Drawings 9 through 13, Doc ID# 61020
Leachate System Details	Sheet 14 of 14, Doc ID# 61020
Cross Section A-A through Cross Section F-F	Drawings 5 through 8 Doc I.D. #61020
Bottom Liner Grading Plan	Drawing 1 of 14, Doc ID #61020
Final Cover Plan	Figure 2.5 Doc ID #72481
<u>Documents for the expansion</u>	
Site Plan	Sheet 2 of 15 Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf
Subgrade Excavation	Sheet 3 of 15 Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf

Clay Liner Plan	Sheet 4 of 15 Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf
Protective Cover Layer Plan	Sheet 5 of 15 Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf
Development Plan	Sheet 6 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Final Cover Plan	Sheet 7 of 15 Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf
Cross Section A	Sheet 8 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Cross Section B and C	Sheet 9 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Liner and Final Cover Details	1 of 2 Sheet 10 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Liner and Final Cover Details 2 of 2	Sheet 11 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Leachate Collection System Details 1 of 2	Sheet 12 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Leachate Collection System Details 2 of 2	Sheet 13 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Stormwater and Erosion Control Systems	Sheet 14 of 15Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Miscellaneous Details	Sheet 15 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf

8. The permittee shall implement the Hazardous and Unauthorized Waste Exclusion Plan presented in Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf.

In addition to the implementation of the approved plan, the facility shall fully meet all requirements of 8 CAR § 60-412 regarding the exclusion of all unauthorized waste streams.

Revised in 4/29/2025 response to comments

9. The permittee shall implement the Landfill Gas Monitoring Plan presented in Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf. In addition to the implementation of the approved Landfill Gas Monitoring Plan, the facility shall fully meet the requirements of 8 CAR § 60-415 regarding the control of explosive gases. The facility shall monitor each of the gas monitoring probes detailed in the approved Landfill Gas Monitoring Plan and within all structures at the facility on a quarterly basis. The results shall be submitted to the Division within fourteen (14) calendar days following each monitoring event.

10. The permittee shall implement the requirements detailed in the Operating Plan Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf and Narrative presented in Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf. In addition to the implementation of the approved Operating Plan and Narrative, the facility shall fully meet the requirements of Part 60.

Revised in 4/29/2025 response to comments

11. Leachate collection removal and leachate storage systems shall be monitored and operated such that free-flowing conditions are maintained in the leachate collection system. Leachate which is disposed in publicly owned treatment works (POTW) must comply with 40 CFR Part 403 (United State Environmental Protection Agency (EPA) General Pretreatment Regulations). Leachate shall otherwise be managed in accordance with the Leachate Management Plan found in Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf. Leachate sampling shall be conducted according to the Leachate Management Plan found in Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf and General Condition Number 18.

12. The permittee shall implement the Construction Quality Assurance Plan presented in Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf. In addition to the implementation of the approved Construction Quality Assurance Plan, the facility shall fully meet all requirements of 8 CAR § 60-428. The facility shall be required to submit construction plans and specifications to the Division prior to each construction event at the facility.

13. The permittee shall implement the Closure and Post-Closure Care Plans presented in Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf. In addition to the implementation of the approved Closure and Post Closure Care Plans, the facility shall fully meet all requirements of 8 CAR § 60-1301 and 8 CAR § 60-1302. The post-closure care period for this facility shall be a minimum of 30 (thirty) years starting on the date the Division accepts closure of the facility. The length of the post-closure care period may be decreased or increased by the Director in accordance with 8 CAR § 60-1302(c)(2). Closure Certification Reports for final cover construction shall be submitted to the Division in accordance with 8 CAR § 60-1301 and in accordance with the approved Closure Plan.

14. Leachate derived from areas with a composite bottom liner system designed in accordance with 8 CAR § 60-424(b) may be recirculated back onto areas from whence it was derived, provided a management plan meeting the requirements of 8 CAR § 60-429(k) is submitted and approved by the Department. Leachate screening and monitoring shall be in accordance with 8 CAR § 60-429(l).

Records of leachate recirculation shall, at a minimum, include the criteria specified in 8 CAR § 60-421(f) and 8 CAR § 60-429(k). Recirculation of leachate derived from and or placement onto areas not having a composite liner system designed in accordance with section 8 CAR § 60-424(b) is strictly prohibited. Previously approved plans are not permitted. If leachate recirculation is to be proposed, the permittee shall submit a leachate recirculation plan for review and approval prior to implementation.

15. The permittee shall furnish the Division annual engineering inspection reports in accordance with 8 CAR § 60-423 on the latest form provided by the Division. The annual engineering inspection report for Class 1 facilities is due on March 31 of each year and shall cover the preceding period beginning January 1 and ending December 31.

GROUNDWATER MONITORING PERMIT CONDITIONS

1. A groundwater monitoring system shall be established and maintained that consists of a sufficient number of wells or sampling points installed at appropriate locations and depths in order to:

    a. Provide groundwater quality passing the relevant point of compliance of the solid waste unit, facility, or practice as defined by 8 CAR § 60-106. The downgradient monitoring system must ensure detection of groundwater contamination in the uppermost aquifer; and

    b. Provide background that has not been affected by any solid waste unit, facility, or practice as defined by 8 CAR § 60-106.

2. The groundwater monitoring system for this facility must always be properly maintained, sampled in accordance with the terms and conditions stipulated in this permit, and comply with the requirements found in Part 60. Once established, groundwater monitoring shall be conducted throughout the active life and post-closure care period.

3. The facility will follow an approved Sampling and Analysis Plan (SAP). The currently approved SAP is dated February 2012 by Terracon and contained in Doc ID 61939. The most recent revised SAP is dated April 25, 2025, and contained within the document Response to DEQ Comments for Permit Modification Application for Expansion of the Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill dated April 29, 2025. Additional details and modifications can be found in well installation reports (Doc IDs 73025 and 79904) as well as the Geotechnical and Hydrogeological Investigation Summary Report (FTN, Doc ID 85572). Changes to this approved SAP will be accomplished following the provisions of Part 60.

4. The groundwater monitoring system shall include, at a minimum, 13 monitoring wells. These monitoring wells are MW-9R2, -14R, -16R, -17R, -19, -20R, -21, -22, -23, -24, -25, -26, and -27R as shown in Figure 2 of the SAP dated April 25, 2025. Any modification of the groundwater monitoring system will follow the provisions of Part 60.

5. No monitoring well or piezometer shall be installed, decommissioned, replaced, repaired, or otherwise altered without prior approval of the Division. Upon completion of a well installation, replacement, decommissioning, repair or alteration, a report shall be submitted to the Division within sixty (60) days of completion and a copy shall be placed in the facility operating record.

Within the report, work quality and methods must be certified by the supervising professional.

6. The groundwater monitoring frequency shall be at least semi-annual during the active life of the facility and the post-closure period. For semi-annual monitoring, the monitoring events will be performed approximately six months apart. In addition, one monitoring event will be performed within the first six months of the year (January through June) and one monitoring event within the last six months of the year (July through December).

7. For new monitoring wells, quarterly sampling is required until enough data has been collected to adequately perform reliable statistical analysis per recommendations of the EPA Unified Guidance [Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance by EPA dated March 2009 (EPA-530/R-09-007)]. Quarterly monitoring events will be performed approximately three months apart. In addition, one monitoring event will be performed during each quarter, defined as: January through March, April through June, July through September, and October through December.

8. Groundwater quality background concentrations used in statistical evaluations for the site groundwater monitoring system shall not be based on data affected by any solid waste landfill unit, facility, or practice as defined in Part 60.

9. The sample analysis shall be performed by a third-party laboratory that is properly certified by the Division's State Environmental Laboratory Certification Program Act (Ark. Code Ann §8-2-201 et seq.) to perform the types of analyses required by Part 60 and this permit. Analytical results shall be submitted directly from the contract or independent third-party laboratory to the Division.

10. The detection monitoring parameters will include at a minimum Part 60 Appendix A parameters, chloride, total dissolved solids, sulfate, total organic carbon, pH, specific conductance, iron, and manganese.

11. All parameter concentrations which are above the Method Detection Limit (MDL) must be reported. Any MDL or Practical Quantitation Limit (PQL) laboratory reported concentration shall be the lowest concentration level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions using current laboratory standards. Analytical methods may be modified by the Division based upon analytical results and new laboratory techniques.

12. All groundwater statistical methodologies shall be performed in a manner that complies with Part 60 and consistent with the most appropriate recommendations for specific situations per the Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance by EPA dated March 2009 (EPA 530-R-09-007) or the most current, relevant EPA statistical guidance. Any statements or methodologies within the groundwater sampling and analysis plan that do not meet these criteria shall not be considered authorized by the Division.

13. Schedule of a Nature and Extent Investigation and Corrective Action if required – If one or more assessment monitoring constituents are detected at statically significant levels above the groundwater protection standard 8 CAR § 60-1205(g), the facility shall submit a work plan (including a schedule) for characterizing the nature and extent of the release to the Division within

thirty (30) calendar days of either: a) the statistical finding; or b) if an Alternate Source Demonstration (ASD) is submitted per 8 CAR § 60-1205(g)(2)(B), upon written notice that the ASD was not approved by the Division.

14. The permittee must then initiate an assessment of corrective measures for the facility in accordance with 8 CAR § 60-1206. Based upon the results of the assessment of corrective measures, the permittee must proceed with selection of a remedy in accordance with 8 CAR § 60-1207 and then proceed with implementation of a corrective action program for the facility in accordance with 8 CAR § 60-1208.

15. For monitoring wells entering into assessment monitoring, the sampling of the full list of Appendix 2 parameters will be annually for the initial two (2) sampling events per 8 CAR § 60-1205(b). Afterwards, sampling of the full list of Appendix 2 parameters may be performed at wells in assessment monitoring according to the following schedule based on 8 CAR § 60-1205(c):

    a. All monitoring wells which had an exceedance of the groundwater protection standard during the previous calendar year shall be sampled annually.

    b. The remainer of wells in assessment monitoring will be sampled every three (3) years.

16. Additional monitoring parameters of concern may be added to the required sampling lists during either detection monitoring, assessment monitoring, or corrective action by the Division per Part 60 based upon individual waste and leachate characteristics as stated in 8 CAR § 60-1204(a)(3) or to be protective of human health and the environment as stated in 8 CAR § 60-1203(c).

GENERAL CONDITIONS

1. This permit is issued in reliance upon the statements and representations made in the application, operating narrative, plans, specifications, correspondence, and other related documents. The Division bears no responsibility for the adequacy or proper functioning of the disposal facility. Nothing contained herein shall be construed as releasing the permittee from any liability from damage to persons or property due to the installation, maintenance, or operation of the disposal facility or any act of the permittee, or the permittee's employees or agents.

2. The disposal facility shall be constructed, operated, and maintained in accordance with the final plans, specifications, and operation narrative as approved by the Division and in compliance with applicable provisions of the Act, Part 60, and all other applicable rules and regulations.

3. At all times the disposal facility shall be maintained in good condition and operations shall be conducted by licensed, qualified on-site operators holding the appropriate license in accordance with 8 CAR pt. 62, Licensing of Solid Waste Management Facilities and Training and Certification Requirements for Environmental Officers.

4. This permit may be revoked or modified whenever, in the opinion of the Division, the facility is no longer in compliance with the Act, Part 60, or other applicable rules and regulations. Except where expressly authorized by the Division, this permit shall not relieve the permittee, or the permittee's employees or agents, from compliance with the provisions of the Act and Part 60.

5. The Division may issue modifications or amendments to this permit governing the design, operation, maintenance, closure or post-closure of the facility during the term of this permit. Such modifications or amendments shall be attached to this permit and shall be fully maintained and enforceable as a condition or conditions of this permit.

6. The facility shall pay the annual fee assessed in accordance with 8 CAR pt. 12, Fee Rule. The facility shall also be responsible for quarterly payments of other landfill disposal fees as required under 8 CAR pt. 61, Rules for Solid Waste Disposal Fees; Landfill Post-Closure Trust Fund; Solid Waste Management and Recycling Fund Distribution; and Recycling Grant Programs. Failure to pay fees when due may result in revocation of this permit.

7. The permittee shall maintain an Operating Record at the location indicated in the permit application, or at an alternate location approved in writing by the Division.

    a. At a minimum, the following documents and materials shall be retained in the facility operating record for review by authorized representatives of the Division:

        i. The approved facility operating plan, approved permit plans and specifications, CQA reports, site inspection reports, operator licenses, this disposal permit and written authorizations issued by the Division that provide modifications to the facility or its operations, all environmental monitoring or test results, and other pertinent records, certifications and correspondence as required by Part 60 or other permit conditions herein; and

        ii. All construction test results, certifications, acceptances, construction reports, photographs, layout drawings, record (as-constructed) drawings, shop drawings, construction drawings, and other documentation required by the specifications, and CQA/QC plans, reports and documents; and

        iii. Other documents that pertain to the operation and maintenance closure and/or post-closure of the facility, or as directed by the Division.

    b. The permittee shall forward a copy of information from the Operating Record when requested by the Division.

8. Transactions that affect the ownership of the facility must be fully disclosed to the Division in accordance with 8 CAR § 60-307.

    a. For purposes of evaluating whether a change in ownership occurs, ownership or control may result from a change in the equity of the permittee of five percent (5%) or more.

    b. If applicable, the permittee shall submit to the Division annual and quarterly reports required by the Securities and Exchange Commission (SEC) that provide information regarding legal proceedings in which the permittee has been involved to determine whether any change in ownership or control of the operation of this landfill has occurred.

c. A permit transfer will not be required when a change in ownership or control of the facility is among the persons and/or entities previously disclosed to the Division in Section E of the Disclosure Statement or similar disclosure.

Same as #15 in site-specific comments.

9. The ~~permittee~~ shall furnish the Division annual engineering inspection reports in accordance with 8 CAR § 60-423. The annual report shall address the 12-month period from January through December and shall be submitted to the Division by March 31 of the following year.

10. A survey control system shall be established and maintained at the landfill site that complies with 8 CAR § 60-426.

11. The landfill working face shall be confined to the smallest practicable area.

12. The permittee shall not engage in or allow salvage operations at the facility except with written authorization from the Division or as may be provided in the section titled Site Specific Conditions of this permit. The Division may review and approve requests for future salvage of disposed materials for recycling purposes on a case-by-case basis.

13. Disposal of bulk liquid waste in the landfill is prohibited. Liquid waste is waste that contains "free liquids" as defined by Method 9095 (Paint Filter Liquids Test) in EPA Publication No. SW-846. Reintroduction of liquids other than leachate will be reviewed and permitted under the EPA Research, Development and Demonstration permit.

14. Measures to control and prevent storm water run-on from running through or into the active disposal area shall be constructed and maintained. Grading, dikes, diversion ditches, silt fencing, silt, traps, and other best management practices (BMP) for storm water control shall be provided as necessary to control/prevent off-site sediment accumulation from landfill related operations.

15. Appropriate National Pollution Discharge Elimination System (NPDES) construction/storm water permit(s) shall be obtained for storm water discharges from the landfill site and borrow sites. A Storm Water Pollution Prevention Plan (SWPPP), which outlines erosion and sediment control measures, shall be prepared and implemented in accordance with applicable NPDES requirements. A copy of the SWPPP shall be maintained on-site for reference by operating staff.

16. The permittee shall comply with the air criteria requirements of 8 CAR § 60-416. Those requirements include meeting the State Implementation Plan (SIP) pursuant to Section 110 of the Clean Air Act; prohibiting open burning of solid waste, unless authorized by the Division; and establishing fire safety procedures.

17. Litter control fences shall be provided in the active fill area for the control of blowing litter. Other litter control measures shall be implemented, if necessary, to confine litter to the smallest practicable extent and prevent litter from leaving the site.

18. Leachate screening and monitoring shall be in accordance with 8 CAR § 60-429(l). Leachate from the landfill will be sampled at a minimum of the same frequency and for the same parameters as groundwater monitoring. Leachate sampling frequency and parameters may be adjusted by the Division as allowed by 8 CAR § 60-429(l)(B) and 8 CAR § 60-429(l)(C).

19. The permittee shall implement a hazardous waste screening and detection program at the facility in accordance with the approved operating plan and 8 CAR § 60-412. The program shall include procedures for evaluation of any questionable wastes prior to disposal to determine whether the waste complies with Part 60 requirements for disposal in the facility.

Site is approved to use degradable polyethylene film (DIN 7540) as noted in permit modification application. Please note it here.

20. The permittee must cover disposed waste with at least six inches of soil at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging. No portion of the waste is to be left exposed at the end of the operating day. Alternative materials for daily cover, such as synthetic materials, shall only be used when specifically authorized in writing by the Division. Any alternative daily cover that is proposed by the permittee must comply with Division guidelines and include specific written operating procedures that will be implemented to control disease vectors, fires, odors, blowing litter, and scavenging. The use of synthetic material will not be authorized unless it is incorporated within operating procedures that also rely on the use of at least six inches of soil cover for daily cover on some days; any proposal for daily cover based solely upon full-time use of synthetic material will not be approved.

21. The final grades and elevations shown on the approved design plans referenced herein shall not be exceeded at any time or in anticipation of settlement and consolidation of the waste mass.

    a. Timely initiation and completion of closure of landfill cells or units shall be made in accordance with 8 CAR § 60-1301(f) and (g).

    b. Proper construction of the final cover system shall be observed and certified in writing to the Division by a Professional Engineer registered in the State of Arkansas in a Construction Certification Report in accordance with the approved CQA Plan whenever a cell, area or phase of the landfill is closed out.

    c. The Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation and extent of closed area(s); and test locations.

22. Any statements in the operational narrative, application documents, specifications, monitoring plans and/or engineering plans that conflict with and are less stringent than Part 60, permit conditions herein, or other applicable laws and rules shall not be considered authorized by the Division. The permittee shall comply with the most stringent of 1) Permit conditions contained herein; 2) Part 60 and other rules covering solid waste; and 3) State solid waste statutes.

23. This permit authorizes one (1) active disposal area at the facility per 8 CAR § 60-411(c). Multiple working faces shall not be utilized at the facility unless the permittee can provide adequate justification for more than one working face and specific authorization for such is granted in writing by the Division. It is not anticipated that such authorization will be granted except on a temporary basis for highly unusual or emergency situations.

24. The Division, its employees, agents, or any authorized person shall have the right to enter the property at any time for any reason as set out in Part 60 for the purposes of, including but not limited

to taking samples, reviewing the operating record, inspecting the facility, and perform other enforcement or engineering action without interference or delay from the permittee.

25. The Division's decision to issue this permit is final for purposes of appeal as of the date indicated in the Certificate of Service. If any provision of these conditions or the application of these conditions thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of these conditions that can be given effect without the invalid provision or application. Therefore, to this end, the provisions of these conditions are declared to be severable.

APPROVED BY: **Division of Environmental Quality**
5301 Northshore Drive
North Little Rock, Arkansas 72218

_____
Bryan Leamons
Associate Director, Office of Land Resources

_____
Date

Statement of Basis:
Permit Modification Application Summary and Rationale
CCSWDA Class 1 Landfill
Permit No. 0254-S1-R5 (Draft); AFIN 16-00199

Permit Application Summary

This summary form consists of information submitted during the permitting process. It represents basic information from the administrative record utilized in forming recommendations from the Office of Land Resources. The entire file for the solid waste permit application specified below should be reviewed for complete details on the proposed facility.

Permit Modification Application Summary	
Name of Applicant:	Craighead County SWDA
Type of Facility:	Class 1 landfill
Engineering Firm:	Olsson
Application Date:	December 12, 2024
Site Location:	General: 238 CR 476 Jonesboro, Arkansas 72404 Specific: Sections 32 and 33, Township 13 North, Range 4 East, Craighead County, Arkansas.
Permit Area:	Permitted Landfill Disposal Area: 352 ±Acres. Property Total Area: 520 ±Acres.
Residence Within 2 Miles:	The majority of dwellings are to the north and east of the site. The area to the south and west is primarily used as cropland.
Water Supplies Within ½ Mile:	The water wells are used for agricultural purposes. Well 42 on the property itself is used to wash the trucks down onsite.
Wetlands:	There are no jurisdictional wetland areas within the currently proposed class 1 expansion area.
Geology:	The landfill is underlain by Quaternary-age alluvial terrace deposits. The alluvium reaches depths up to 150 ft. bgs. and is characterized by unconsolidated alluvial and terrace deposits of sands and gravels grading upward to clays and interbedded with silt and fine-grained sand. The saturated portion of the Quaternary-age sands and gravels comprises the Mississippi River Valley alluvial aquifer. Along the eastern side of the property, Crowley's Ridge consists of wind-blown loess; Quaternary-age clay, silt, sand, and gravel; and the Claiborne group. The tertiary-aged Cook Mountain Formation lies directly beneath the Quaternary alluvium and is composed of thick beds of marine clay. The Cook Mountain Formation is an average of 120 ft. thick and forms the Middle Claiborne confining unit, which acts as an aquitard beneath the alluvial aquifer.
Soils:	There are two soils series within the Class 1 Landfill area: Falaya silt loam and Henry silt loam. The Falaya series consists of very deep, somewhat poorly drained, moderately permeable soils that formed in silty alluvium from loess. These level to nearly level soils are wide floodplains in the Southern Mississippi

Permit Modification Application Summary	
	River Valley Silty Uplands, Major Land Resource Area (MLRA) 134. They are subject to occasional flooding and are saturated with water at 1 to 2 ft. during periods of high rainfall. Slopes range from 0% to 2% and have a high availability water supply. The color ranges from brown to grey and can have yellowish-brown masses of iron accumulation. The Henry series consists of very deep, poorly drained soils that have a slowly permeable fragipan in the subsoil. These soils formed in loess more than 4 ft. thick in depressions and nearly level areas on uplands and terraces; MLRA 134. Slopes range from 0% to 2%. These soils are in depressions, broad drainageways, level areas in uplands or low-relief terraces. The color can change from pale brown to grey.
Groundwater:	The uppermost aquifer in the region is the Mississippi River Valley alluvial aquifer and is comprised of the saturated basal sand and gravel deposits of the Quaternary-age alluvial terrace deposits. The surficial Quaternary-age clay and silt form a semi-confining to confining layer over much of the aquifer. Beneath the alluvial aquifer is the middle Claiborne confining unit, which is composed of the thick beds of marine clay of the Cook Mountain Formation. In Craighead County and west of Crowley's Ridge, the direction of flow in the alluvial aquifer is influenced by a regional cone of depression, the center of which is in neighboring Poinsett County to the south. The landfill is located over the northern edge of the depression in a Critical Groundwater Area as designated by the Arkansas Natural Resource Commission (ANRC). In the vicinity of the landfill, regional direction of flow is to the southwest. The alluvial aquifer commonly yields as much as 5000 gpm., while it is more common for wells to produce around 2000 gpm. Groundwater use is primarily for agriculture and irrigation purposes. Elevated levels of hardness, arsenic, iron, and manganese limit its direct use for domestic drinking water.
Surface Drainage Sequence:	Surface water drainage in the vicinity of the landfill is influenced by Crowley's Ridge and drains to the west-southwest through a series of small ditches. Surface water in the vicinity of the site drains to USACE Lateral Number 1 located to the south of the site or to USACE Main Ditch Number 1 to the west. The water flows from the canals into the L'Anguille River and then to the St. Francis River through a break in Crowley's Ridge. The landfill is located at the norther portion of the L'Anguille Watershed, which is part of the St. Francis River basin. Surface runoff with the landfill property boundary is controlled and collected in onsite stormwater collection/sedimentation ponds. Stormwater discharge is managed in accordance with the landfill's National Pollutant Discharge Elimination System (NPDES) permit (NPDES permit no. ARG160049).
Waste Streams:	Class 1 and 4 wastes as well as special wastes as defined in Part 60.
Total Capacity:	13,030,900 cubic yards
Disposal Rate:	218,500 cubic yards
Projected Active Life after this modification:	28 years
Bottom Liner	1) 24-inch-thick compacted soil layer with a maximum hydraulic

Permit Modification Application Summary	
System (bottom to top):	conductivity of 1 x 10^{-7} cm/sec; 2) 60-mil high-density polyethylene (HDPE) geomembrane liner; 3) geocomposite drainage layer; and 4) 12-inch leachate drainage / protective cover layer.
Final Cover	See Condition #6

Permit Summary and Rationale

The following information was considered during the preparation of a draft permitting decision for the proposed facility:

Permit Pre-Application dated August 22, 2006.

Permit Application dated January 12, 2009. The application was later completed through documents furnished beginning on February 18, 2010 through March 8, 2012.

Correspondence from the Permittee; The Arkansas Solid Waste Management Code, as Amended (Part 60); and all other applicable rules of the Division.

This permit modification was submitted on December 12, 2024.

Condition No.	Site Specific Conditions
1.	Concerns the expiration of the permit. The permit will expire when the facility is filled to permit capacity and closed out in accordance with 8 CAR § 60-309 and the approved Closure Plan.
2.	Specifies the amount of financial assurance. (8 CAR § 60-1402 and 8 CAR § 60-1403).
3.	Concerns the type of disposal material permitted for the Class 1 landfill including special materials outlined in 8 CAR § 60-701 through 8 CAR § 60-708.
4.	Specifies that each landfill waste cell shall be constructed in the sequence indicated in the approved plans and specifications. (8 CAR § 60-411(a))
5.	This permit condition establishes the approved bottom liner system configuration of the landfill in accordance with 8 CAR § 60-424 and 8 CAR § 60-428.
6.	This permit condition establishes the approved final cover in accordance with 8 CAR § 60-428 and 8 CAR § 60-1301.
7.	This permit condition details the approved landfill plans for the facility. Any changes to the plans listed will require a modification to the facility permit.
8.	This permit condition identifies the approved Hazardous Waste Exclusion Plan for the facility as required by 8 CAR § 60-412.
9.	This permit condition details the approved Explosive Gas Monitoring System and Plan as required by 8 CAR § 60-415.
10.	This permit condition establishes the approved Operating Plan and Narrative as required by Part 60.

Condition No.	Site Specific Conditions
11.	Specifies the leachate collection removal and leachate storage systems shall be monitored and operated such that free-flowing conditions are maintained.
12.	This condition establishes the approved CQA Plan for the facility and requires review of construction documents prior to all construction events.
13.	This permit condition establishes the approved Closure and Post-Closure Care Plan for the facility as required by 8 CAR § 60-1301 and 8 CAR § 60-1302.
14.	This permit condition establishes the leachate recirculation for the facility as required by Part 60 as cited in the body of the condition.
15.	The submittal of annual engineering inspection reports is required by 8 CAR § 60-423.

Condition No.	Groundwater Monitoring Conditions
1.	Requires the permittee to utilize and maintain a groundwater monitoring system to adequately monitor potential impacts on groundwater from facility operations. A general summary of 8 CAR § 60-1202(a).
2.	Specifies the duration of maintenance, design, installation, and operation of the groundwater monitoring system at the facility required by 8 CAR § 60-1201(d).
3.	Requires the facility to follow an approved groundwater sampling and analysis plan that complies with 8 CAR § 60-1203(j).
4.	References the proposed well identification numbers and well locations for this facility to be used as the groundwater monitoring system required by 8 CAR § 60-1202(a). Point of compliance is defined in 8 CAR § 60-424(d).
5.	Requires the facility to modify groundwater monitoring system as approved in permit. Gives schedule for submittal of a work plan that is required by 8 CAR § 60-1103(f). Requires Division approval and supervising professional certification for modifying facility groundwater monitoring wells or piezometers per 8 CAR § 60-1103(f).
6.	Requires the permittee to sample at least semi-annually per 8 CAR § 60-1204(b). Specifies semi-annual monitoring intervals.
7.	Specifies quarterly monitoring intervals. Quarterly sampling during background sampling is required by 8 CAR § 60-1203(e) and quarterly sampling during assessment monitoring is required by 8 CAR § 60-1205(d)(2)(A).
8.	Requires background concentrations used in statistical evaluations in the site groundwater monitoring reports to be data which has not been affected by a solid waste landfill unit, facility, or practice as defined by Part 60. EPA's March 2009 Unified Guidance (page 5-1) states that: *"High quality background is the single most important key to a successful statistical groundwater monitoring program, especially for detection monitoring. All of the statistical tests listed in the RCRA regulations are predicated on having appropriate and representative background measurements ... The most important quality of background is that it reflects the historical conditions unaffected by the activities it is designed to be compared to.* " Several sections of Part 60 address a combination of background and statistical methods either directly or

Condition No.	Groundwater Monitoring Conditions
	indirectly. These sections include: 1201(a), 1202(a)(1), 1204(c)(3), 1205(g)(2), 523, and 524(c).
9.	Requires sample analyses to be completed by a Division's approved laboratory per the "State Environmental Laboratory Certification Program Act (Ark. Code Ann. § 8-2-201 et Seq.)". Requires direct submittal of all analytical results from the contract or independent third-party laboratory to the Division per 8 CAR § 60-1203(j)(3).
10.	States detection monitoring parameters per 8 CAR § 60-1204(a) and (d).
11.	Requires parameter concentrations above the MDL to be reported to the Division and for the PQL and MDL reported to be the lowest concentration that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions using current laboratory standards per 8 CAR § 60-1203(h)(5). The sampling procedures and frequency must be protective of human health and the environment per 8 CAR § 60-1203(c).
12.	States all groundwater statistical methodologies will comply with Part 60. In addition, the methodologies will be consistent with the EPA Unified Guidance or the most current relevant EPA statistical guidance publication per 8 CAR § 60-1203(g)(6) and (7). The statistical methods and techniques used in the statistical evaluation must be clearly explained and referenced as part of the groundwater monitoring report documentation and discussion required by 8 CAR § 60-1203(k).
13 & 14	Establishes timeline for the execution of 8 CAR § 60-1205(g) following the finding of Statistically Significant Assessment Levels above the Groundwater Protection Standard. Also requires permittee to follow 8 CAR § 60-1206, 1207 and 1208.
15.	Discuss Appendix 2 sampling frequency if facility is in assessment monitoring Rule No. 22.1205(c).
16.	Additional monitoring parameters of concern may be added to the required sampling lists during either detection monitoring, assessment monitoring, or corrective action by the Division per Part 60 based upon individual waste and leachate characteristics as stated in 8 CAR § 60-1204(a)(3) or to be protective of human health and the environment as stated in 8 CAR § 60-1203(c).

Condition No.	General Conditions
1.	States the Division has no responsibility for the proper functioning of the disposal facility and the permittee is not exempt from liability to third parties per 8 CAR pt. 11.
2.	Concerns the requirements for construction and operation of the disposal facility in accordance with the approved plans/specifications/operation narrative are in accordance with 8 CAR § 60-308, 8 CAR § 60-411, and 8 CAR § 60-422.
3.	Concerns requirements to maintain the disposal facility in good operating condition under licensed, qualified, on-site landfill operators is in accordance with 8 CAR § 60-411 and with 8 CAR § 62-101.
4.	Concerns the right of the Division to revoke or modify the permit in the event the facility is no longer in compliance with the Arkansas Solid Waste Management Act, Part 60, or other applicable rules and regulations in accordance with 8 CAR § 60-308.

Condition No.	General Conditions
5.	Concerns issuance of modifications to the permit by the Division is in accordance with 8 CAR § 60-308 and 8 CAR § 60-422.
6.	Concerns payment of permit fees in accordance with 8 CAR pt. 12 and 8 CAR pt. 61.
7.	Concerns requirements for maintenance of landfill related documents in an Operating Record are in accordance with 8 CAR § 60-421.
8.	Concerns permit transfer must be disclosed to the Division in accordance with 8 CAR § 60-307.
9.	Concerns requirements for submittal of an annual engineering inspection report are in accordance with 8 CAR § 60-423.
10.	Outlines the requirements for implementation and maintenance of a survey control system at the landfill site for horizontal and vertical control of landfill construction/operation is in accordance with 8 CAR § 60-426.
11.	Outlines requirements for disposal in a single working area of the smallest practicable extent are in accordance with 8 CAR § 60-411(c).
12.	Regards salvage operations are not allowed in accordance with 8 CAR § 60-411.
13.	Concerns the prohibition of the disposal of bulk liquid waste in the landfill is in accordance with 8 CAR § 60-420.
14. & 15.	Concerns measures to control and prevent stormwater run through or into the active face and requirements for appropriate NPDES permit(s) and a Storm Water Pollution Prevention Plan (SWPPP) is in accordance with 8 CAR § 60-418, 8 CAR § 60-419 and 8 CAR § 60-427, and the Clean Water Act.
16.	Concerns requirements for compliance with applicable air criteria is in accordance with 8 CAR § 60-416 and the Clean Air Act.
17.	Concerns requirements for litter control fences and other control measures for blowing litter in accordance with 8 CAR § 60-411.
18.	Requires leachate from the landfill to be sampled, at a minimum, at the same frequency and for the same parameters as ground water monitoring per 8 CAR § 60-429(l).
19.	Concerns requirements for the implementation of a hazardous waste screening and detection program at the facility is in accordance with 8 CAR § 60-412.
20.	Concerns the application of six inches of soil at the end of each operating day or at more frequent intervals, if necessary, in accordance with 8 CAR § 60-413.
21.	Concerns requirements to fill within the final grades and elevations indicated on the approved plans, timely initiation, and completion of closure, and proper CQA monitoring, and certification are in accordance with 8 CAR § 60-411, 8 CAR § 60-428, and 8 CAR § 60-1301.
22.	Concerns the requirements for the permittee to comply with Part 60 or permit conditions in the event of a conflict between them and representations in the permit application documents.
23.	Concerns the permit authorizes only one (1) working face in accordance with 8 CAR § 60-411(c).
24.	Concerns the right of Division employees to enter the permittee's property to inspect the facility at any time without interference or delay is in accordance with 8 CAR § 60-1501.

Condition No.	General Conditions
25.	Concerns providing notice for the purpose of appeal of the final permit in accordance with 8 CAR § 60-306 and in accordance with 8 CAR pt. 11. Provisions regarding severability are in accordance with 8 CAR § 60-105.

PERMIT
FOR THE CONSTRUCTION AND OPERATION OF A
SOLID WASTE DISPOSAL FACILITY
ISSUED BY
STATE OF ARKANSAS
DEPARTMENT OF ENERGY AND ENVIRONMENT
DIVISION OF ENVIRONMENTAL QUALITY
OFFICE OF LAND RESOURCES

Class 1 Landfill

Permit Number:	0254-S1-R5
AFIN:	16-00199
Effective Date:	August 11, 2025
Original Issuance Date:	May 4, 1990
Permit Owner & Address:	Craighead County Solid Waste Disposal Authority PO Box 16777 Jonesboro, Arkansas 72403
Facility Name & Address:	Class 1 Landfill 238 CR 476 Jonesboro, Arkansas 72404
Facility Location:	Section 32 and 33, Township 13 North, Range 4 East, Craighead County, Arkansas.
Permitted Landfill Disposal Area:	297 Acres
Property Total Area:	525 Acres
Permitted Disposal Capacity:	13,030,873 cubic yards
Financial Assurance:	Closure $3,925,920 Post-Closure $2,716,500 Total $6,642,420

This permit authorizes the construction and operation of the Class 1 Landfill as set forth in the permit application submitted by Craighead County Solid Waste Disposal Authority, hereinafter called "owner" or "permittee," and received by the Division of Environmental Quality on December 12, 2024. The application was completed through a series of documents furnished by the permittee beginning on December 2, 2024 under Document ID (Doc ID) 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf and follow-up documents received on April 29, 2025 under Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf.

This permit is issued pursuant to the provisions of the Arkansas Solid Waste Management Act (Arkansas Code Annotated 8-6-201 et seq.) as amended, hereinafter called the "Act"; 8 CAR pt. 60, Arkansas Solid Waste Management Rules, as adopted by the Arkansas Pollution Control and Ecology Commission, hereinafter called "Part 60"; and all other applicable rules and regulations administered by the Division of Environmental Quality, hereinafter called "Division", and the following terms and conditions:

DESCRIPTION OF THIS PERMIT ACTION

This permit modification is a lateral expansion which increases the permitted disposal area by 55 acres and capacity by 6,025,600 cubic yards. On the effective date, this permit supersedes all prior solid waste permits issued by the Division for this Class 1 Permit.

SITE SPECIFIC CONDITIONS

1. This permit is for an approximately 520-acre facility with 297 acres permitted for waste disposal as indicated on the approved plans. The final grades and elevations shall not be exceeded at any time or in the anticipation of settlement and consolidation of the waste mass. This permit shall expire when the authorized fill elevations have been attained, and the facility is closed out in accordance with the provisions of Part 60.

    a. The Division shall be notified in writing upon construction of each disposal unit and upon facility closure in order that it may be inspected.

    b. Changes to or deviations from the construction and operation of the facility, as indicated on the approved facility plans indicated below, and on the approved permit application documentation, are not authorized unless approved in writing by the Division.

    c. The approved application document is filed under Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf, 54436, and 61939.

2. The total amount of financial assurance is $6,642,420. Of this amount $3,925,920 will be required for closure costs and $2,716,500 will be required for post-closure costs. This amount shall be subject to annual adjustments and may be increased at the discretion of the Division based upon the estimated cost for a third party to close the largest area requiring final cover during the active life of the facility and the cost for a third party to perform post-closure care.

    a. The instruments used to demonstrate financial assurance must be in accordance with the mechanisms set forth in 8 CAR § 60-1405(a) through (l) or as otherwise approved by the Division.

    b. Operations allowed under this permit shall not commence until all financial assurance is satisfactorily filed with the Division.

    c. A portion or all of the financial assurance may be held by the Division beyond the time of cessation of disposal operations at the site to ensure satisfactory closure and post closure care in accordance with Part 60.

3. This permit is for the disposal of all waste eligible for a Class 1 landfill including "special materials" as outlined in 8 CAR § 60-701 through 8 CAR § 60-708. Special Materials as identified in Part 60 do not require written authorization from the Division provided the materials that are identified, managed, and disposed according to provisions of the approved Hazardous and Unauthorized Waste Exclusion Plan under Doc IDs 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf and Subpart 7 of Part 60. Materials that are not specifically identified by the Special Materials section must be characterized by the generator of the waste prior to acceptance for disposal in the landfill in accordance with the facility's written Hazardous and Unauthorized Waste Exclusion Plan.

4. Each landfill waste cell shall be constructed in the sequence indicated in the approved plans and specifications.

5. The bottom liner system for any newly constructed waste cell must consist of a minimum 60 mil textured HDPE flexible membrane liner and a minimum of twenty-four inches of compacted clay exhibiting a maximum hydraulic conductivity of 1×10^{-7} centimeters per second (cm/s). Should the permittee desire to use any liner system other than a "composite liner" system as defined in 8 CAR § 60-424 (b), an Alternative Liner Demonstration in accordance with Division written guidance on alternative liner design and demonstration shall be submitted to and approved by the Division prior to initiation of construction of the alternative liner system. The Division reserves the right to require the installation of additional groundwater monitoring wells and make other changes to the permit in the event a request to use an alternative liner design is approved.

    a. Proper construction of the bottom clay liner of each waste cell shall be observed and certified to the Division by a Professional Engineer registered in the State of Arkansas in a Construction Certification Report in accordance with the approved Construction Quality Assurance (CQA) Plan whenever a cell is prepared for use.

    b. The Construction Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation, and extent of area(s) constructed for use; and test locations.

    c. The Certification Report shall be submitted to the Division at least fourteen (14) calendar days prior to waste placement in that cell.

6. The final cover system shall be designed according to the specifications set forth under Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf, which consists of (top to bottom):

    For the new cells:

    1) 6-inch vegetative soil layer.
    2) 12-inch protective cover soil layer;
    3) double-sided geocomposite drainage layer;
    4) 40-mil textured linear low-density polyethylene (LLDPE) geomembrane liner; and
    5) GCL; and
    6) 12-inch-thick intermediate cover layer;

For the existing cells there are 2 options:

Geosynthetic Clay Liner (GCL) Option

1) 18-inch erosion layer.
2) double-sided geocomposite drainage layer;
3) 40-mil textured linear low-density polyethylene (LLDPE) geomembrane liner; and
4) GCL; and
5) 12-inch-thick intermediate cover layer;

Compacted Clay Option

1) 18-inch erosion layer.
2) double-sided geocomposite drainage layer;
3) 40-mil textured linear low-density polyethylene (LLDPE) geomembrane liner; and
4) 18-inch compacted clay with a maximum hydraulic conductivity of $1x10^{-7}$ cm/sec; and
5) 12-inch-thick intermediate cover layer;

7. The approved permit plans for the facility are as follows:

<u>Original Cell</u>	
Progression of Fill Plan	NEC drawings 15 through 27 Document I.D. #54436
Final Cover Detail	Drawing 2 of 14 Doc. #61939
Stormwater Management Plan	Drawing 3 of 14 Doc. ID# 61020
Gas Management Plan Details	Drawings 4 and 4A of 14 Doc. ID# 61020 Drawings 9 through 13, Doc ID# 61020
Leachate System Details	Sheet 14 of 14, Doc ID# 61020
Cross Section A-A through Cross Section F-F	Drawings 5 through 8 Doc I.D. #61020
Bottom Liner Grading Plan	Drawing 1 of 14, Doc ID #61020
Final Cover Plan	Figure 2.5 Doc ID #72481
<u>Documents for the expansion</u>	
Site Plan	Sheet 2 of 15 Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf
Subgrade Excavation	Sheet 3 of 15 Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf
Clay Liner Plan	Sheet 4 of 15 Doc ID 0254-S1-R4_CCSWDA Permit

	Modification Revisions_20250429.pdf
Protective Cover Layer Plan	Sheet 5 of 15 Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf
Development Plan	Sheet 6 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Final Cover Plan	Sheet 7 of 15 Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf
Cross Section A	Sheet 8 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Cross Section B and C	Sheet 9 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Liner and Final Cover Details	1 of 2 Sheet 10 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Liner and Final Cover Details 2 of 2	Sheet 11 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Leachate Collection System Details 1 of 2	Sheet 12 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Leachate Collection System Details 2 of 2	Sheet 13 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Stormwater and Erosion Control Systems	Sheet 14 of 15Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf
Miscellaneous Details	Sheet 15 of 15 Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf

8. The permittee shall implement the Hazardous and Unauthorized Waste Exclusion Plan presented in Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf. In addition to the implementation of the approved plan, the facility shall fully meet all requirements

of 8 CAR § 60-412 regarding the exclusion of all unauthorized waste streams.

9. The permittee shall implement the Landfill Gas Monitoring Plan presented in Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf. In addition to the implementation of the approved Landfill Gas Monitoring Plan, the facility shall fully meet the requirements of 8 CAR § 60-415 regarding the control of explosive gases. The facility shall monitor each of the gas monitoring probes detailed in the approved Landfill Gas Monitoring Plan and within all structures at the facility on a quarterly basis. The results shall be submitted to the Division within fourteen (14) calendar days following each monitoring event.

10. The permittee shall implement the requirements detailed in the Operating Plan Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf and Narrative presented in Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf. In addition to the implementation of the approved Operating Plan and Narrative, the facility shall fully meet the requirements of Part 60.

11. Leachate collection removal and leachate storage systems shall be monitored and operated such that free-flowing conditions are maintained in the leachate collection system. Leachate which is disposed in publicly owned treatment works (POTW) must comply with 40 CFR Part 403 (United State Environmental Protection Agency (EPA) General Pretreatment Regulations). Leachate shall otherwise be managed in accordance with the Leachate Management Plan found in Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf. Leachate sampling shall be conducted according to the Leachate Management Plan found in Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf and General Condition Number 18.

12. The permittee shall implement the Construction Quality Assurance Plan presented in Doc ID 0254-S1-R4_Class 1 Permit Major Modification-Melissa Vaught to ePortal_20241202.pdf. In addition to the implementation of the approved Construction Quality Assurance Plan, the facility shall fully meet all requirements of 8 CAR § 60-428. The facility shall be required to submit construction plans and specifications to the Division prior to each construction event at the facility.

13. The permittee shall implement the Closure and Post-Closure Care Plans presented in Doc ID 0254-S1-R4_CCSWDA Permit Modification Revisions_20250429.pdf. In addition to the implementation of the approved Closure and Post Closure Care Plans, the facility shall fully meet all requirements of 8 CAR § 60-1301 and 8 CAR § 60-1302. The post-closure care period for this facility shall be a minimum of 30 (thirty) years starting on the date the Division accepts closure of the facility. The length of the post-closure care period may be decreased or increased by the Director in accordance with 8 CAR § 60-1302(c)(2). Closure Certification Reports for final cover construction shall be submitted to the Division in accordance with 8 CAR § 60-1301 and in accordance with the approved Closure Plan.

14. Leachate derived from areas with a composite bottom liner system designed in accordance with 8 CAR § 60-424(b) may be recirculated back onto areas from whence it was derived, provided a management plan meeting the requirements of 8 CAR § 60-429(k) is submitted and approved by the Department. Leachate screening and monitoring shall be in accordance with 8 CAR § 60-429(l). Records of leachate recirculation shall, at a minimum, include the criteria specified in 8 CAR § 60-421(f) and 8 CAR § 60-429(k). Recirculation of leachate derived from and or placement onto areas

not having a composite liner system designed in accordance with section 8 CAR § 60-424(b) is strictly prohibited. Previously approved plans are not permitted. If leachate recirculation is to be proposed, the permittee shall submit a leachate recirculation plan for review and approval prior to implementation.

GROUNDWATER MONITORING PERMIT CONDITIONS

1. A groundwater monitoring system shall be established and maintained that consists of a sufficient number of wells or sampling points installed at appropriate locations and depths in order to:

    a. Provide groundwater quality passing the relevant point of compliance of the solid waste unit, facility, or practice as defined by 8 CAR § 60-106. The downgradient monitoring system must ensure detection of groundwater contamination in the uppermost aquifer; and

    b. Provide background that has not been affected by any solid waste unit, facility, or practice as defined by 8 CAR § 60-106.

2. The groundwater monitoring system for this facility must always be properly maintained, sampled in accordance with the terms and conditions stipulated in this permit, and comply with the requirements found in Part 60. Once established, groundwater monitoring shall be conducted throughout the active life and post-closure care period.

3. The facility will follow an approved Sampling and Analysis Plan (SAP). The currently approved SAP is dated February 2012 by Terracon and contained in Doc ID 61939. The most recent revised SAP is dated April 25, 2025, and contained within the document Response to DEQ Comments for Permit Modification Application for Expansion of the Craighead County Solid Waste Disposal Authority Class 1 Legacy Landfill dated April 29, 2025. Additional details and modifications can be found in well installation reports (Doc IDs 73025 and 79904) as well as the Geotechnical and Hydrogeological Investigation Summary Report (FTN, Doc ID 85572). Changes to this approved SAP will be accomplished following the provisions of Part 60.

4. The groundwater monitoring system shall include, at a minimum, 13 monitoring wells. These monitoring wells are MW-9R2, -14R, -16R, -17R, -19, -20R, -21, -22, -23, -24, -25, -26, and -27R as shown in Figure 2 of the SAP dated April 25, 2025. Any modification of the groundwater monitoring system will follow the provisions of Part 60.

5. No monitoring well or piezometer shall be installed, decommissioned, replaced, repaired, or otherwise altered without prior approval of the Division. Upon completion of a well installation, replacement, decommissioning, repair or alteration, a report shall be submitted to the Division within sixty (60) days of completion and a copy shall be placed in the facility operating record. Within the report, work quality and methods must be certified by the supervising professional.

6. The groundwater monitoring frequency shall be at least semi-annual during the active life of the facility and the post-closure period. For semi-annual monitoring, the monitoring events will be performed approximately six months apart. In addition, one monitoring event will be performed within the first six months of the year (January through June) and one monitoring event within the

last six months of the year (July through December).

7. For new monitoring wells, quarterly sampling is required until enough data has been collected to adequately perform reliable statistical analysis per recommendations of the EPA Unified Guidance [Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance by EPA dated March 2009 (EPA-530/R-09-007)]. Quarterly monitoring events will be performed approximately three months apart. In addition, one monitoring event will be performed during each quarter, defined as: January through March, April through June, July through September, and October through December.

8. Groundwater quality background concentrations used in statistical evaluations for the site groundwater monitoring system shall not be based on data affected by any solid waste landfill unit, facility, or practice as defined in Part 60.

9. The sample analysis shall be performed by a third-party laboratory that is properly certified by the Division's State Environmental Laboratory Certification Program Act (Ark. Code Ann §8-2-201 et seq.) to perform the types of analyses required by Part 60 and this permit. Analytical results shall be submitted directly from the contract or independent third-party laboratory to the Division.

10. The detection monitoring parameters will include at a minimum Part 60 Appendix A parameters, chloride, total dissolved solids, sulfate, total organic carbon, pH, specific conductance, iron, and manganese.

11. All parameter concentrations which are above the Method Detection Limit (MDL) must be reported. Any MDL or Practical Quantitation Limit (PQL) laboratory reported concentration shall be the lowest concentration level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions using current laboratory standards. Analytical methods may be modified by the Division based upon analytical results and new laboratory techniques.

12. All groundwater statistical methodologies shall be performed in a manner that complies with Part 60 and consistent with the most appropriate recommendations for specific situations per the Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance by EPA dated March 2009 (EPA 530-R-09-007) or the most current, relevant EPA statistical guidance. Any statements or methodologies within the groundwater sampling and analysis plan that do not meet these criteria shall not be considered authorized by the Division.

13. Schedule of a Nature and Extent Investigation and Corrective Action if required – If one or more assessment monitoring constituents are detected at statically significant levels above the groundwater protection standard 8 CAR § 60-1205(g), the facility shall submit a work plan (including a schedule) for characterizing the nature and extent of the release to the Division within thirty (30) calendar days of either: a) the statistical finding; or b) if an Alternate Source Demonstration (ASD) is submitted per 8 CAR § 60-1205(g)(2)(B), upon written notice that the ASD was not approved by the Division.

14. The permittee must then initiate an assessment of corrective measures for the facility in accordance with 8 CAR § 60-1206. Based upon the results of the assessment of corrective measures, the

permittee must proceed with selection of a remedy in accordance with 8 CAR § 60-1207 and then proceed with implementation of a corrective action program for the facility in accordance with 8 CAR § 60-1208.

15. For monitoring wells entering into assessment monitoring, the sampling of the full list of Appendix 2 parameters will be annually for the initial two (2) sampling events per 8 CAR § 60-1205(b). Afterwards, sampling of the full list of Appendix 2 parameters may be performed at wells in assessment monitoring according to the following schedule based on 8 CAR § 60-1205(c):

    a. All monitoring wells which had an exceedance of the groundwater protection standard during the previous calendar year shall be sampled annually.

    b. The remainer of wells in assessment monitoring will be sampled every three (3) years.

16. Additional monitoring parameters of concern may be added to the required sampling lists during either detection monitoring, assessment monitoring, or corrective action by the Division per Part 60 based upon individual waste and leachate characteristics as stated in 8 CAR § 60-1204(a)(3) or to be protective of human health and the environment as stated in 8 CAR § 60-1203(c).

GENERAL CONDITIONS

1. This permit is issued in reliance upon the statements and representations made in the application, operating narrative, plans, specifications, correspondence, and other related documents. The Division bears no responsibility for the adequacy or proper functioning of the disposal facility. Nothing contained herein shall be construed as releasing the permittee from any liability from damage to persons or property due to the installation, maintenance, or operation of the disposal facility or any act of the permittee, or the permittee's employees or agents.

2. The disposal facility shall be constructed, operated, and maintained in accordance with the final plans, specifications, and operation narrative as approved by the Division and in compliance with applicable provisions of the Act, Part 60, and all other applicable rules and regulations.

3. At all times the disposal facility shall be maintained in good condition and operations shall be conducted by licensed, qualified on-site operators holding the appropriate license in accordance with 8 CAR pt. 62, Licensing of Solid Waste Management Facilities and Training and Certification Requirements for Environmental Officers.

4. This permit may be revoked or modified whenever, in the opinion of the Division, the facility is no longer in compliance with the Act, Part 60, or other applicable rules and regulations. Except where expressly authorized by the Division, this permit shall not relieve the permittee, or the permittee's employees or agents, from compliance with the provisions of the Act and Part 60.

5. The Division may issue modifications or amendments to this permit governing the design, operation, maintenance, closure or post-closure of the facility during the term of this permit. Such modifications or amendments shall be attached to this permit and shall be fully maintained and enforceable as a condition or conditions of this permit.

6. The facility shall pay the annual fee assessed in accordance with 8 CAR pt. 12, Fee Rule. The facility shall also be responsible for quarterly payments of other landfill disposal fees as required under 8 CAR pt. 61, Rules for Solid Waste Disposal Fees; Landfill Post-Closure Trust Fund; Solid Waste Management and Recycling Fund Distribution; and Recycling Grant Programs. Failure to pay fees when due may result in revocation of this permit.

7. The permittee shall maintain an Operating Record at the location indicated in the permit application, or at an alternate location approved in writing by the Division.

    a. At a minimum, the following documents and materials shall be retained in the facility operating record for review by authorized representatives of the Division:

        i. The approved facility operating plan, approved permit plans and specifications, CQA reports, site inspection reports, operator licenses, this disposal permit and written authorizations issued by the Division that provide modifications to the facility or its operations, all environmental monitoring or test results, and other pertinent records, certifications and correspondence as required by Part 60 or other permit conditions herein; and

        ii. All construction test results, certifications, acceptances, construction reports, photographs, layout drawings, record (as-constructed) drawings, shop drawings, construction drawings, and other documentation required by the specifications, and CQA/QC plans, reports and documents; and

        iii. Other documents that pertain to the operation and maintenance closure and/or post-closure of the facility, or as directed by the Division.

    b. The permittee shall forward a copy of information from the Operating Record when requested by the Division.

8. Transactions that affect the ownership of the facility must be fully disclosed to the Division in accordance with 8 CAR § 60-307.

    a. For purposes of evaluating whether a change in ownership occurs, ownership or control may result from a change in the equity of the permittee of five percent (5%) or more.

    b. If applicable, the permittee shall submit to the Division annual and quarterly reports required by the Securities and Exchange Commission (SEC) that provide information regarding legal proceedings in which the permittee has been involved to determine whether any change in ownership or control of the operation of this landfill has occurred.

    c. A permit transfer will not be required when a change in ownership or control of the facility is among the persons and/or entities previously disclosed to the Division in Section E of the Disclosure Statement or similar disclosure.

9. The permittee shall furnish the Division annual engineering inspection reports in accordance with 8 CAR § 60-423. The annual report shall address the 12-month period from January through

December and shall be submitted to the Division by March 31 of the following year.

10. A survey control system shall be established and maintained at the landfill site that complies with 8 CAR § 60-426.

11. The landfill working face shall be confined to the smallest practicable area.

12. The permittee shall not engage in or allow salvage operations at the facility except with written authorization from the Division or as may be provided in the section titled Site Specific Conditions of this permit. The Division may review and approve requests for future salvage of disposed materials for recycling purposes on a case-by-case basis.

13. Disposal of bulk liquid waste in the landfill is prohibited. Liquid waste is waste that contains "free liquids" as defined by Method 9095 (Paint Filter Liquids Test) in EPA Publication No. SW-846. Reintroduction of liquids other than leachate will be reviewed and permitted under the EPA Research, Development and Demonstration permit.

14. Measures to control and prevent storm water run-on from running through or into the active disposal area shall be constructed and maintained. Grading, dikes, diversion ditches, silt fencing, silt, traps, and other best management practices (BMP) for storm water control shall be provided as necessary to control/prevent off-site sediment accumulation from landfill related operations.

15. Appropriate National Pollution Discharge Elimination System (NPDES) construction/storm water permit(s) shall be obtained for storm water discharges from the landfill site and borrow sites. A Storm Water Pollution Prevention Plan (SWPPP), which outlines erosion and sediment control measures, shall be prepared and implemented in accordance with applicable NPDES requirements. A copy of the SWPPP shall be maintained on-site for reference by operating staff.

16. The permittee shall comply with the air criteria requirements of 8 CAR § 60-416. Those requirements include meeting the State Implementation Plan (SIP) pursuant to Section 110 of the Clean Air Act; prohibiting open burning of solid waste, unless authorized by the Division; and establishing fire safety procedures.

17. Litter control fences shall be provided in the active fill area for the control of blowing litter. Other litter control measures shall be implemented, if necessary, to confine litter to the smallest practicable extent and prevent litter from leaving the site.

18. Leachate screening and monitoring shall be in accordance with 8 CAR § 60-429(l). Leachate from the landfill will be sampled at a minimum of the same frequency and for the same parameters as groundwater monitoring. Leachate sampling frequency and parameters may be adjusted by the Division as allowed by 8 CAR § 60-429(l)(B) and 8 CAR § 60-429(l)(C).

19. The permittee shall implement a hazardous waste screening and detection program at the facility in accordance with the approved operating plan and 8 CAR § 60-412. The program shall include procedures for evaluation of any questionable wastes prior to disposal to determine whether the waste complies with Part 60 requirements for disposal in the facility.

20. The permittee must cover disposed waste with at least six inches of soil at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging. No portion of the waste is to be left exposed at the end of the operating day. Alternative materials for daily cover, such as synthetic materials, shall only be used when specifically authorized in writing by the Division. Any alternative daily cover that is proposed by the permittee must comply with Division guidelines and include specific written operating procedures that will be implemented to control disease vectors, fires, odors, blowing litter, and scavenging. The use of synthetic material will not be authorized unless it is incorporated within operating procedures that also rely on the use of at least six inches of soil cover for daily cover on some days; any proposal for daily cover based solely upon full-time use of synthetic material will not be approved. Currently, the site is allowed to utilize a synthetic degradable film in conjunction with the soil daily cover (see Doc ID 7540).

21. The final grades and elevations shown on the approved design plans referenced herein shall not be exceeded at any time or in anticipation of settlement and consolidation of the waste mass.

    a. Timely initiation and completion of closure of landfill cells or units shall be made in accordance with 8 CAR § 60-1301(f) and (g).

    b. Proper construction of the final cover system shall be observed and certified in writing to the Division by a Professional Engineer registered in the State of Arkansas in a Construction Certification Report in accordance with the approved CQA Plan whenever a cell, area or phase of the landfill is closed out.

    c. The Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation and extent of closed area(s); and test locations.

22. Any statements in the operational narrative, application documents, specifications, monitoring plans and/or engineering plans that conflict with and are less stringent than Part 60, permit conditions herein, or other applicable laws and rules shall not be considered authorized by the Division. The permittee shall comply with the most stringent of 1) Permit conditions contained herein; 2) Part 60 and other rules covering solid waste; and 3) State solid waste statutes.

23. This permit authorizes one (1) active disposal area at the facility per 8 CAR § 60-411(c). Multiple working faces shall not be utilized at the facility unless the permittee can provide adequate justification for more than one working face and specific authorization for such is granted in writing by the Division. It is not anticipated that such authorization will be granted except on a temporary basis for highly unusual or emergency situations.

24. The Division, its employees, agents, or any authorized person shall have the right to enter the property at any time for any reason as set out in Part 60 for the purposes of, including but not limited to taking samples, reviewing the operating record, inspecting the facility, and perform other enforcement or engineering action without interference or delay from the permittee.

25. The Division's decision to issue this permit is final for purposes of appeal as of the date indicated in the Certificate of Service. If any provision of these conditions or the application of these

conditions thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of these conditions that can be given effect without the invalid provision or application. Therefore, to this end, the provisions of these conditions are declared to be severable.

APPROVED BY: **Division of Environmental Quality**
5301 Northshore Drive
North Little Rock, Arkansas 72218

Bryan Leamons

_____
Bryan Leamons
Deputy Director, Office of Land Resources

August 11, 2025

_____
Date

Statement of Basis:
Permit Modification Application Summary and Rationale
CCSWDA Class 1 Landfill
Permit No. 0254-S1-R5; AFIN 16-00199

Permit Application Summary

This summary form consists of information submitted during the permitting process. It represents basic information from the administrative record utilized in forming recommendations from the Office of Land Resources. The entire file for the solid waste permit application specified below should be reviewed for complete details on the proposed facility.

Permit Modification Application Summary	
Name of Applicant:	Craighead County SWDA
Type of Facility:	Class 1 landfill
Engineering Firm:	Olsson
Application Date:	December 12, 2024
Site Location:	General: 238 CR 476 Jonesboro, Arkansas 72404 Specific: Sections 32 and 33, Township 13 North, Range 4 East, Craighead County, Arkansas.
Permit Area:	Permitted Landfill Disposal Area: 297 ±Acres. Property Total Area: 520 ±Acres.
Residence Within 2 Miles:	The majority of dwellings are to the north and east of the site. The area to the south and west is primarily used as cropland.
Water Supplies Within ½ Mile:	The water wells are used for agricultural purposes. Well 42 on the property itself is used to wash the trucks down onsite.
Wetlands:	There are no jurisdictional wetland areas within the currently proposed class 1 expansion area.
Geology:	The landfill is underlain by Quaternary-age alluvial terrace deposits. The alluvium reaches depths up to 150 ft. bgs. and is characterized by unconsolidated alluvial and terrace deposits of sands and gravels grading upward to clays and interbedded with silt and fine-grained sand. The saturated portion of the Quaternary-age sands and gravels comprises the Mississippi River Valley alluvial aquifer. Along the eastern side of the property, Crowley's Ridge consists of wind-blown loess; Quaternary-age clay, silt, sand, and gravel; and the Claiborne group. The tertiary-aged Cook Mountain Formation lies directly beneath the Quaternary alluvium and is composed of thick beds of marine clay. The Cook Mountain Formation is an average of 120 ft. thick and forms the Middle Claiborne confining unit, which acts as an aquitard beneath the alluvial aquifer.
Soils:	There are two soils series within the Class 1 Landfill area: Falaya silt loam and Henry silt loam. The Falaya series consists of very deep, somewhat poorly drained, moderately permeable soils that formed in silty alluvium from loess. These level to nearly level soils are wide floodplains in the Southern Mississippi

Permit Modification Application Summary	
	River Valley Silty Uplands, Major Land Resource Area (MLRA) 134. They are subject to occasional flooding and are saturated with water at 1 to 2 ft. during periods of high rainfall. Slopes range from 0% to 2% and have a high availability water supply. The color ranges from brown to grey and can have yellowish-brown masses of iron accumulation. The Henry series consists of very deep, poorly drained soils that have a slowly permeable fragipan in the subsoil. These soils formed in loess more than 4 ft. thick in depressions and nearly level areas on uplands and terraces; MLRA 134. Slopes range from 0% to 2%. These soils are in depressions, broad drainageways, level areas in uplands or low-relief terraces. The color can change from pale brown to grey.
Groundwater:	The uppermost aquifer in the region is the Mississippi River Valley alluvial aquifer and is comprised of the saturated basal sand and gravel deposits of the Quaternary-age alluvial terrace deposits. The surficial Quaternary-age clay and silt form a semi-confining to confining layer over much of the aquifer. Beneath the alluvial aquifer is the middle Claiborne confining unit, which is composed of the thick beds of marine clay of the Cook Mountain Formation. In Craighead County and west of Crowley's Ridge, the direction of flow in the alluvial aquifer is influenced by a regional cone of depression, the center of which is in neighboring Poinsett County to the south. The landfill is located over the northern edge of the depression in a Critical Groundwater Area as designated by the Arkansas Natural Resource Commission (ANRC). In the vicinity of the landfill, regional direction of flow is to the southwest. The alluvial aquifer commonly yields as much as 5000 gpm., while it is more common for wells to produce around 2000 gpm. Groundwater use is primarily for agriculture and irrigation purposes. Elevated levels of hardness, arsenic, iron, and manganese limit its direct use for domestic drinking water.
Surface Drainage Sequence:	Surface water drainage in the vicinity of the landfill is influenced by Crowley's Ridge and drains to the west-southwest through a series of small ditches. Surface water in the vicinity of the site drains to USACE Lateral Number 1 located to the south of the site or to USACE Main Ditch Number 1 to the west. The water flows from the canals into the L'Anguille River and then to the St. Francis River through a break in Crowley's Ridge. The landfill is located at the norther portion of the L'Anguille Watershed, which is part of the St. Francis River basin. Surface runoff with the landfill property boundary is controlled and collected in onsite stormwater collection/sedimentation ponds. Stormwater discharge is managed in accordance with the landfill's National Pollutant Discharge Elimination System (NPDES) permit (NPDES permit no. ARG160049).
Waste Streams:	Class 1 and 4 wastes as well as special wastes as defined in Part 60.
Total Capacity:	13,030,900 cubic yards
Disposal Rate:	218,500 cubic yards
Projected Active Life after this modification:	28 years
Bottom Liner	1) 24-inch-thick compacted soil layer with a maximum hydraulic

Permit Modification Application Summary	
System (bottom to top):	conductivity of 1 x 10^{-7} cm/sec; 2) 60-mil high-density polyethylene (HDPE) geomembrane liner; 3) geocomposite drainage layer; and 4) 12-inch leachate drainage / protective cover layer.
Final Cover	See Condition #6

Permit Summary and Rationale

The following information was considered during the preparation of a draft permitting decision for the proposed facility:

Permit Pre-Application dated August 22, 2006.

Permit Application dated January 12, 2009. The application was later completed through documents furnished beginning on February 18, 2010 through March 8, 2012.

Correspondence from the Permittee; The Arkansas Solid Waste Management Code, as Amended (Part 60); and all other applicable rules of the Division.

This permit modification was submitted on December 12, 2024.

Condition No.	Site Specific Conditions
1.	Concerns the expiration of the permit. The permit will expire when the facility is filled to permit capacity and closed out in accordance with 8 CAR § 60-309 and the approved Closure Plan.
2.	Specifies the amount of financial assurance. (8 CAR § 60-1402 and 8 CAR § 60-1403).
3.	Concerns the type of disposal material permitted for the Class 1 landfill including special materials outlined in 8 CAR § 60-701 through 8 CAR § 60-708.
4.	Specifies that each landfill waste cell shall be constructed in the sequence indicated in the approved plans and specifications. (8 CAR § 60-411(a))
5.	This permit condition establishes the approved bottom liner system configuration of the landfill in accordance with 8 CAR § 60-424 and 8 CAR § 60-428.
6.	This permit condition establishes the approved final cover in accordance with 8 CAR § 60-428 and 8 CAR § 60-1301.
7.	This permit condition details the approved landfill plans for the facility. Any changes to the plans listed will require a modification to the facility permit.
8.	This permit condition identifies the approved Hazardous Waste Exclusion Plan for the facility as required by 8 CAR § 60-412.
9.	This permit condition details the approved Explosive Gas Monitoring System and Plan as required by 8 CAR § 60-415.
10.	This permit condition establishes the approved Operating Plan and Narrative as required by Part 60.

Condition No.	Site Specific Conditions
11.	Specifies the leachate collection removal and leachate storage systems shall be monitored and operated such that free-flowing conditions are maintained.
12.	This condition establishes the approved CQA Plan for the facility and requires review of construction documents prior to all construction events.
13.	This permit condition establishes the approved Closure and Post-Closure Care Plan for the facility as required by 8 CAR § 60-1301 and 8 CAR § 60-1302.
14.	This permit condition establishes the leachate recirculation for the facility as required by Part 60 as cited in the body of the condition.

Condition No.	Groundwater Monitoring Conditions
1.	Requires the permittee to utilize and maintain a groundwater monitoring system to adequately monitor potential impacts on groundwater from facility operations. A general summary of 8 CAR § 60-1202(a).
2.	Specifies the duration of maintenance, design, installation, and operation of the groundwater monitoring system at the facility required by 8 CAR § 60-1201(d).
3.	Requires the facility to follow an approved groundwater sampling and analysis plan that complies with 8 CAR § 60-1203(j).
4.	References the proposed well identification numbers and well locations for this facility to be used as the groundwater monitoring system required by 8 CAR § 60-1202(a). Point of compliance is defined in 8 CAR § 60-424(d).
5.	Requires the facility to modify groundwater monitoring system as approved in permit. Gives schedule for submittal of a work plan that is required by 8 CAR § 60-1103(f). Requires Division approval and supervising professional certification for modifying facility groundwater monitoring wells or piezometers per 8 CAR § 60-1103(f).
6.	Requires the permittee to sample at least semi-annually per 8 CAR § 60-1204(b). Specifies semi-annual monitoring intervals.
7.	Specifies quarterly monitoring intervals. Quarterly sampling during background sampling is required by 8 CAR § 60-1203(e) and quarterly sampling during assessment monitoring is required by 8 CAR § 60-1205(d)(2)(A).
8.	Requires background concentrations used in statistical evaluations in the site groundwater monitoring reports to be data which has not been affected by a solid waste landfill unit, facility, or practice as defined by Part 60. EPA's March 2009 Unified Guidance (page 5-1) states that: *"High quality background is the single most important key to a successful statistical groundwater monitoring program, especially for detection monitoring. All of the statistical tests listed in the RCRA regulations are predicated on having appropriate and representative background measurements ... The most important quality of background is that it reflects the historical conditions unaffected by the activities it is designed to be compared to.* " Several sections of Part 60 address a combination of background and statistical methods either directly or indirectly. These sections include: 1201(a), 1202(a)(1), 1204(c)(3), 1205(g)(2), 523, and 524(c).

Condition No.	Groundwater Monitoring Conditions
9.	Requires sample analyses to be completed by a Division's approved laboratory per the "State Environmental Laboratory Certification Program Act (Ark. Code Ann. § 8-2-201 et Seq.)". Requires direct submittal of all analytical results from the contract or independent third-party laboratory to the Division per 8 CAR § 60-1203(j)(3).
10.	States detection monitoring parameters per 8 CAR § 60-1204(a) and (d).
11.	Requires parameter concentrations above the MDL to be reported to the Division and for the PQL and MDL reported to be the lowest concentration that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions using current laboratory standards per 8 CAR § 60-1203(h)(5). The sampling procedures and frequency must be protective of human health and the environment per 8 CAR § 60-1203(c).
12.	States all groundwater statistical methodologies will comply with Part 60. In addition, the methodologies will be consistent with the EPA Unified Guidance or the most current relevant EPA statistical guidance publication per 8 CAR § 60-1203(g)(6) and (7). The statistical methods and techniques used in the statistical evaluation must be clearly explained and referenced as part of the groundwater monitoring report documentation and discussion required by 8 CAR § 60-1203(k).
13 & 14	Establishes timeline for the execution of 8 CAR § 60-1205(g) following the finding of Statistically Significant Assessment Levels above the Groundwater Protection Standard. Also requires permittee to follow 8 CAR § 60-1206, 1207 and 1208.
15.	Discuss Appendix 2 sampling frequency if facility is in assessment monitoring Rule No. 22.1205(c).
16.	Additional monitoring parameters of concern may be added to the required sampling lists during either detection monitoring, assessment monitoring, or corrective action by the Division per Part 60 based upon individual waste and leachate characteristics as stated in 8 CAR § 60-1204(a)(3) or to be protective of human health and the environment as stated in 8 CAR § 60-1203(c).

Condition No.	General Conditions
1.	States the Division has no responsibility for the proper functioning of the disposal facility and the permittee is not exempt from liability to third parties per 8 CAR pt. 11.
2.	Concerns the requirements for construction and operation of the disposal facility in accordance with the approved plans/specifications/operation narrative are in accordance with 8 CAR § 60-308, 8 CAR § 60-411, and 8 CAR § 60-422.
3.	Concerns requirements to maintain the disposal facility in good operating condition under licensed, qualified, on-site landfill operators is in accordance with 8 CAR § 60-411 and with 8 CAR § 62-101.
4.	Concerns the right of the Division to revoke or modify the permit in the event the facility is no longer in compliance with the Arkansas Solid Waste Management Act, Part 60, or other applicable rules and regulations in accordance with 8 CAR § 60-308.
5.	Concerns issuance of modifications to the permit by the Division is in accordance with 8 CAR § 60-308 and 8 CAR § 60-422.

Condition No.	General Conditions
6.	Concerns payment of permit fees in accordance with 8 CAR pt. 12 and 8 CAR pt. 61.
7.	Concerns requirements for maintenance of landfill related documents in an Operating Record are in accordance with 8 CAR § 60-421.
8.	Concerns permit transfer must be disclosed to the Division in accordance with 8 CAR § 60-307.
9.	Concerns requirements for submittal of an annual engineering inspection report are in accordance with 8 CAR § 60-423.
10.	Outlines the requirements for implementation and maintenance of a survey control system at the landfill site for horizontal and vertical control of landfill construction/operation is in accordance with 8 CAR § 60-426.
11.	Outlines requirements for disposal in a single working area of the smallest practicable extent are in accordance with 8 CAR § 60-411(c).
12.	Regards salvage operations are not allowed in accordance with 8 CAR § 60-411.
13.	Concerns the prohibition of the disposal of bulk liquid waste in the landfill is in accordance with 8 CAR § 60-420.
14. & 15.	Concerns measures to control and prevent stormwater run through or into the active face and requirements for appropriate NPDES permit(s) and a Storm Water Pollution Prevention Plan (SWPPP) is in accordance with 8 CAR § 60-418, 8 CAR § 60-419 and 8 CAR § 60-427, and the Clean Water Act.
16.	Concerns requirements for compliance with applicable air criteria is in accordance with 8 CAR § 60-416 and the Clean Air Act.
17.	Concerns requirements for litter control fences and other control measures for blowing litter in accordance with 8 CAR § 60-411.
18.	Requires leachate from the landfill to be sampled, at a minimum, at the same frequency and for the same parameters as ground water monitoring per 8 CAR § 60-429(l).
19.	Concerns requirements for the implementation of a hazardous waste screening and detection program at the facility is in accordance with 8 CAR § 60-412.
20.	Concerns the application of six inches of soil at the end of each operating day or at more frequent intervals, if necessary, in accordance with 8 CAR § 60-413.
21.	Concerns requirements to fill within the final grades and elevations indicated on the approved plans, timely initiation, and completion of closure, and proper CQA monitoring, and certification are in accordance with 8 CAR § 60-411, 8 CAR § 60-428, and 8 CAR § 60-1301.
22.	Concerns the requirements for the permittee to comply with Part 60 or permit conditions in the event of a conflict between them and representations in the permit application documents.
23.	Concerns the permit authorizes only one (1) working face in accordance with 8 CAR § 60-411(c).
24.	Concerns the right of Division employees to enter the permittee's property to inspect the facility at any time without interference or delay is in accordance with 8 CAR § 60-1501.
25.	Concerns providing notice for the purpose of appeal of the final permit in accordance with 8 CAR § 60-306 and in accordance with 8 CAR pt. 11. Provisions regarding

Condition No.	General Conditions
	severability are in accordance with 8 CAR § 60-105.