Weaver Consultants Group

August 13, 2025
Project No. 9943-007-52-00

Ms. Susan Speake
Office of Land Resources
Solid Waste Management
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

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

Dear Ms. Speake:

The purpose of this minor permit modification submitted on behalf of Craighead County Solid Waste Disposal Authority - the owner of Legacy Landfill is to notify Arkansas Department of Environmental Quality (ADEQ) of the proposed expansion of the existing landfill gas (LFG) collection system at the Legacy Landfill (site).

The primary purpose of the voluntarily GCCS expansion is to increase the collection of LFG from the landfill for control of emissions and in preparation of a new renewable natural gas (RNG) facility installation and will include the following components;

System Description

The proposed GCCS expansion will include the installation of LFG extraction wells, horizontal LFG collectors with chimney drains, LFG collection piping, isolation valves, and associated LFG system components as shown on attached Drawing 1.

The proposed LFG system components will be installed in phases as needed at the general locations shown on Drawing 1. The new LFG extraction wells will be installed in vertical borings drilled within the waste. Each LFG extraction well will be fitted with a wellhead valve assembly. The valve assembly will allow the system operator to individually regulate the amount of vacuum and the LFG extraction rate at each extraction point during GCCS operation. In addition, the wellhead valve assembly will include gas monitoring ports for measuring gas composition, pressure, flow rate, and temperature. The wellheads will be connected by new lateral piping which will convey the flow of gas into the new/existing header pipe and then to the blower/flare facility.

The excavated waste during the drilling and piping activities will be sent to the site active disposal area. As the new wells are drilled and completed, they will be connected to the lateral piping. Caps will be installed on the new wells until wellheads are installed and connections are made to the lateral piping. To assist in extracting LFG from the landfill, connections will also be made to the leachate clean out risers (LCR) as necessary to help prevent potential odors at the site.

System Operations

Once the GCCS expansion has been installed, the system will be activated and the well field initially balanced. The new extraction components will be gradually brought online and balanced to a steady-state condition. It is expected that achieving a steady-state condition could take up to several months. During this time, the new extraction components will be routinely monitored and adjusted to minimize air intrusion into the landfill. GCCS operations personnel will also routinely inspect the overall system to note any operating issues with the new GCCS components. Because the active GCCS is voluntary, the site may elect to not operate the system periodically for maintenance or other reasons.

Schedule

It is anticipated that the installation of the proposed system components will commence immediately and will be completed by the end of 2nd quarter of 2026 and may be installed in phases as needed.

The minor permit modification application form is included in Attachment 2 of this submittal. In addition, a $3,000 check for the minor modification application fee has been included in Attachment 3 of this submittal.

One original and one copy of this submittal are provided for your use and distribution. In addition, a copy of this submittal was also placed in the site operating record.

If you have any questions or comments regarding this submittal, please do not hesitate to contact us.

Sincerely,
Weaver Consultants Group, LLC

Colin G. McInnes, P.E.
Principal

Attachments: Attachment 1 – Permit Drawings
Attachment 2 – Minor Permit Modification Application Form
Attachment 3 – Minor Modification application Fee ($3,000 Check)

cc: Ron Allen, ADEQ Air Division
Angela Sparks, CEO Craighead County SWDA (e-copy only)
Robert D Hendrix, Craighead County SWDA (e-copy only)
Kyle Walker, VBM Legacy, LLC (e-copy only)

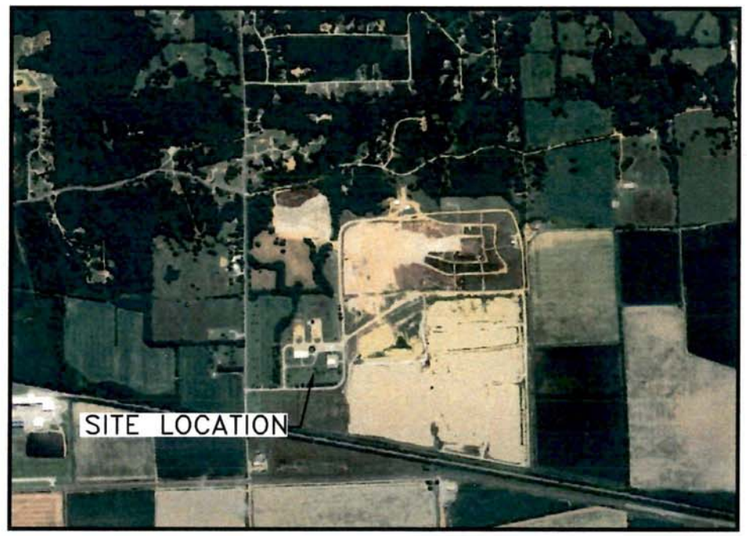
ATTACHMENT 1

PERMIT DRAWINGS

2025 LANDFILL GAS SYSTEM EXPANSION
PERMIT DRAWINGS
LEGACY LANDFILL

CRAIGHEAD COUNTY, ARKANSAS

AUGUST 2025



VICINITY MAP

INDEX TO DRAWINGS

DRAWING NO	DRAWING TITLE	REVISION NO	DATE
0	COVER SHEET	0	08/2025
1	SITE PLAN	0	08/2025
2	EXTRACTION WELL DETAILS	0	08/2025
3	PIPE TRENCH DETAILS	0	08/2025
4	PIPING DETAILS	0	08/2025
5	VALVE DETAILS	0	08/2025
6	PUMP DETAILS	0	08/2025
7	CONDENSATE SUMP DETAILS	0	08/2025
8	HORIZONTAL LFG COLLECTOR DETAILS	0	08/2025

PREPARED FOR

VBM

PREPARED BY

Weaver Consultants Group

6420 SOUTHWEST BLVD., SUITE 206
FORT WORTH, TEXAS 76109
(817) 735-9770
(817) 735-9775 (FAX)

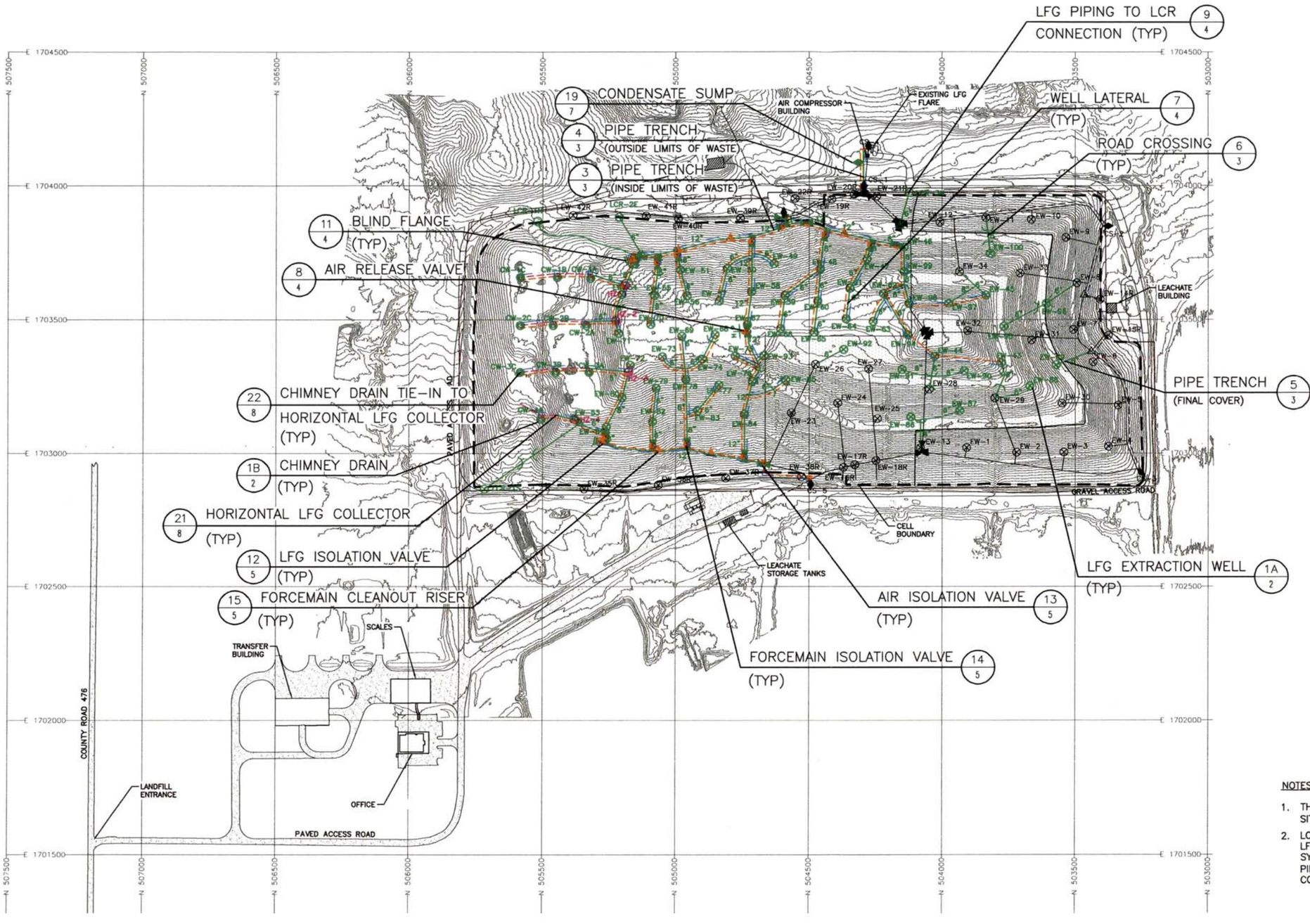
STATE OF ARKANSAS
LICENSED PROFESSIONAL ENGINEER
No. 19714
COLIN G. MCINNES
9/3/2025

CERTIFICATE OF AUTHORIZATION
WEAVER CONSULTLANTS GROUP LLC
No. 1871
ARKANSAS

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0 200 400
SCALE IN FEET

LEGEND

- LIMITS OF WASTE
- EXISTING CONTOUR
- 503000 N — STATE PLANE COORDINATE
- FINAL COVER LIMITS
- EXISTING AIR SUPPLY LINE
- EXISTING CONDENSATE FORCEMAIN
- EXISTING LFG COLLECTION PIPING
- ⊗ EW-10 — EXISTING LFG EXTRACTION WELL
- ○ EW-14R — EXISTING LCR CONNECTION
- ♦ CS-1 — EXISTING CONDENSATE SUMP
- EXISTING LFG ISOLATION VALVE
- △ — EXISTING REMOTE WELLHEAD
- ⊗ EW-80 — PROPOSED LFG EXTRACTION WELL
- HZ-1 — CW-1A — PROPOSED HORIZONTAL LFG COLLECTOR WITH CHIMNEY DRAIN
- ○ LCR-1N — PROPOSED LCR CONNECTION
- PROPOSED LFG COLLECTION PIPING
- PROPOSED CONDENSATE FORCEMAIN
- PROPOSED AIR SUPPLY LINE
- ♦ PROPOSED CONDENSATE SUMP
- PROPOSED LFG ISOLATION VALVE
- △ PROPOSED REMOTE WELLHEAD
- PROPOSED BLIND FLANGE
- PROPOSED HDPE CAP
- PROPOSED ROAD CROSSING
- PROPOSED AIR/FORCEMAIN VALVE
- PROPOSED FORCEMAIN CLEANOUT RISER
- PROPOSED AIR RELEASE VALVE

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LICENSED PROFESSIONAL ENGINEER
No. 19714
COLIN G. MCINNES
8/8/2025

NOTES:

1. THE EXISTING CONTOURS AND ELEVATIONS PROVIDED BY FIRMATEK FROM SITE SCAN COMPLETED ON 4/28/25.
2. LOCATIONS SHOWN FOR THE PROPOSED LFG EXTRACTION WELLS, HORIZONTAL LFG COLLECTORS, COLLECTION PIPING, SUMP, VALVES, AND ASSOCIATED LFG SYSTEM COMPONENTS ARE APPROXIMATE. ACTUAL NUMBERS, LOCATIONS, AND PIPING SIZE/CONFIGURATION TO BE DETERMINED BASED ON THE FIELD CONDITIONS AT THE TIME OF CONSTRUCTION.

P:\LFG\Projects\BioMethane Partners\Legacy Landfill\Const Notice\Minor Mod\PERMIT DRAWINGS\1-SITE PLAN.dwg, 8/11/2025 1:48:20 PM, rsellers, 1:2

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- ☐ DRAFT
- ☒ FOR PERMITTING PURPOSES ONLY
- ☐ ISSUED FOR CONSTRUCTION

DATE: 08/2025
FILE: 9943-007-52
CAD: 1-SITE PLAN.DWG
DRAWN BY: IOS
DESIGN BY: LKS
REVIEWED BY: CGM

Weaver Consultants Group
CERTIFICATE OF AUTHORIZATION NO. 1871

PREPARED FOR
VBM LEGACY, LLC

REVISIONS

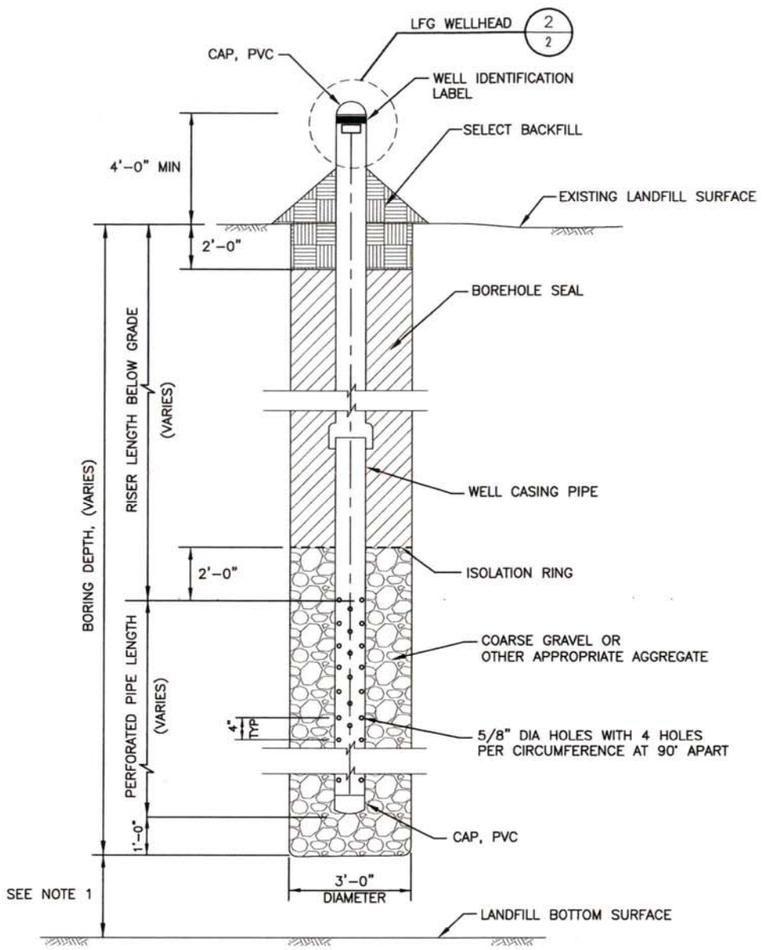
NO.	DATE	DESCRIPTION

2025 LFG SYSTEM EXPANSION SITE PLAN

LEGACY LANDFILL
CRAIGHEAD COUNTY, ARKANSAS

WWW.WCGRP.COM

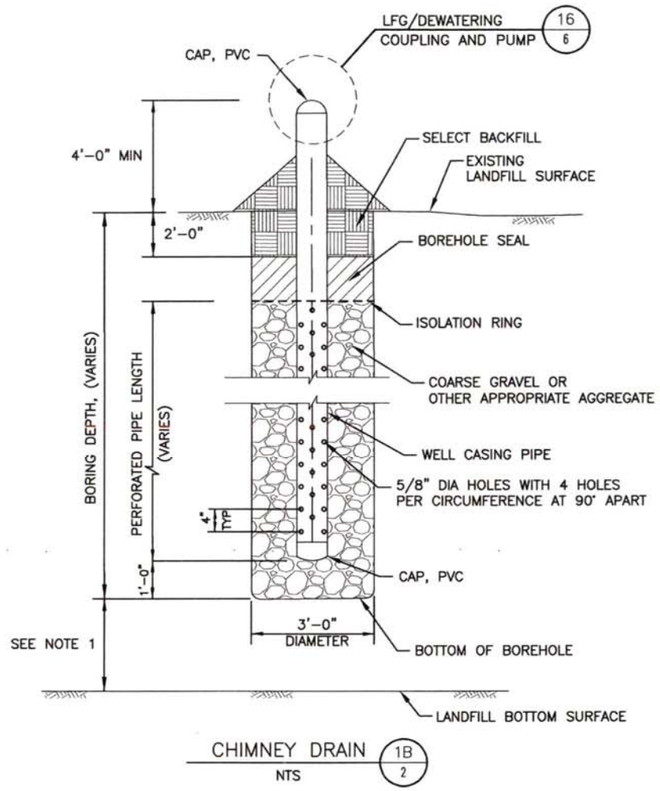
DRAWING 1



LFG EXTRACTION WELL 1A/2
NTS

NOTES:

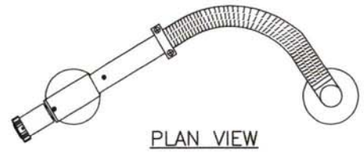
1. BOTTOM OF BORE HOLE TO BE A MINIMUM OF 10 FT FROM LANDFILL TOP OF PROTECTIVE COVER. ALL DEPTHS WILL BE CONFIRMED PRIOR TO DRILLING.
2. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.
3. LIQUID REMOVAL PUMPS MAY BE INSTALLED AS NEEDED.



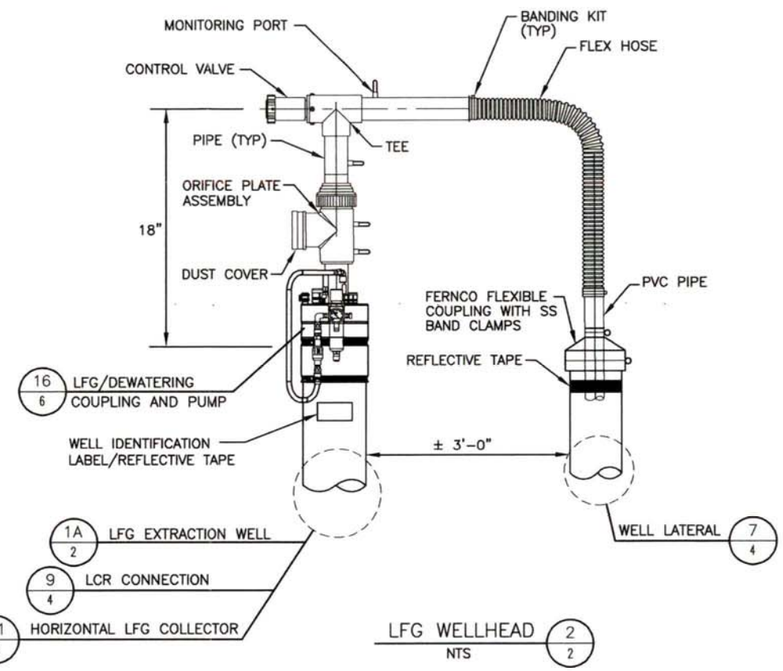
CHIMNEY DRAIN 1B/2
NTS

NOTES:

1. BOTTOM OF BORE HOLE TO BE A MINIMUM OF 10 FT FROM LANDFILL TOP OF PROTECTIVE COVER. ALL DEPTHS WILL BE CONFIRMED PRIOR TO DRILLING.
2. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.
3. LIQUID REMOVAL PUMPS MAY BE INSTALLED AS NEEDED.



PLAN VIEW



LFG WELLHEAD 2/2
NTS

NOTE:

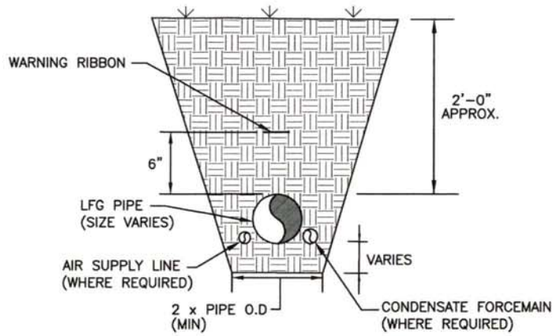
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.

STATE OF ARKANSAS
LICENSED PROFESSIONAL ENGINEER
No. 19714
COLIN G. MCINNES
8/13/2025

☐ DRAFT ☒ FOR PERMITTING PURPOSES ONLY ☐ ISSUED FOR CONSTRUCTION	PREPARED FOR VBM LEGACY, LLC	2025 LFG SYSTEM EXPANSION EXTRACTION WELL DETAILS
DATE: 08/2025 FILE: 9943-007-52 CAD: 2-WELL DETAILS.DWG DRAWN BY: IOS DESIGN BY: LKS REVIEWED BY: CGM	REVISIONS NO. / DATE / DESCRIPTION	LEGACY LANDFILL CRAIGHEAD COUNTY, ARKANSAS
Weaver Consultants Group CERTIFICATE OF AUTHORIZATION NO. 1871	WWW.WCGRP.COM	DRAWING 2

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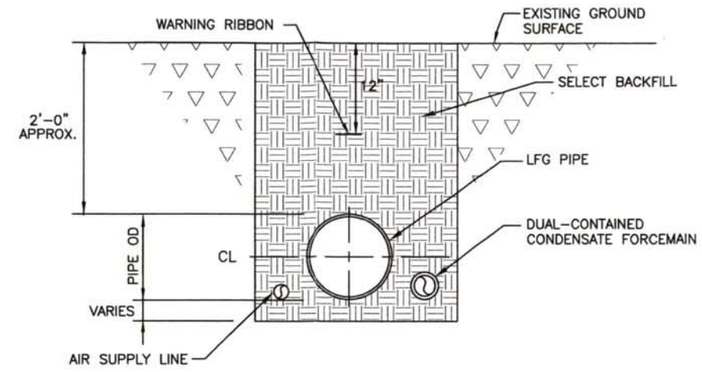
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PIPE TRENCH (3/3)
(INSIDE LIMITS OF WASTE)
NTS

NOTES:

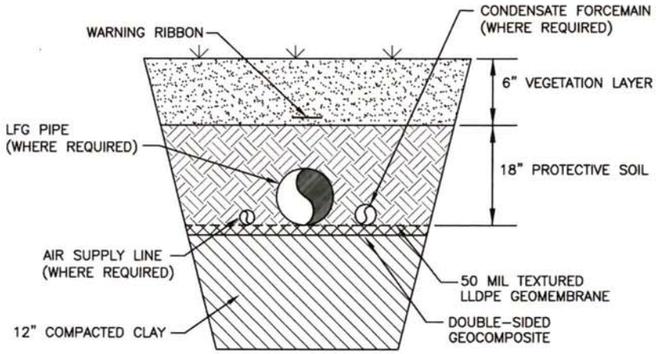
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.
2. THE NUMBER OF PIPES IN THE TRENCH VARIES.



PIPE TRENCH (4/3)
(OUTSIDE LIMITS OF WASTE)
NTS

NOTES:

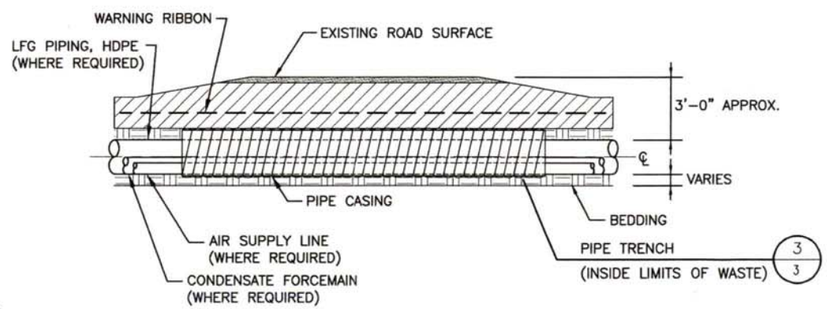
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.
2. THE NUMBER OF PIPES IN THE TRENCH VARIES.



PIPE TRENCH (5/3)
(FINAL COVER)
NTS

NOTES:

1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.
2. THE NUMBER OF PIPES IN THE TRENCH VARIES.
3. THE VEGETATION LAYER AND PROTECTIVE SOIL COVER WILL BE REUSED TO BACKFILL FOLLOWING THE PIPE INSTALLATION IN THE FINAL COVER LANDFILL AREA.



ROAD CROSSING (6/3)
NTS

NOTE:

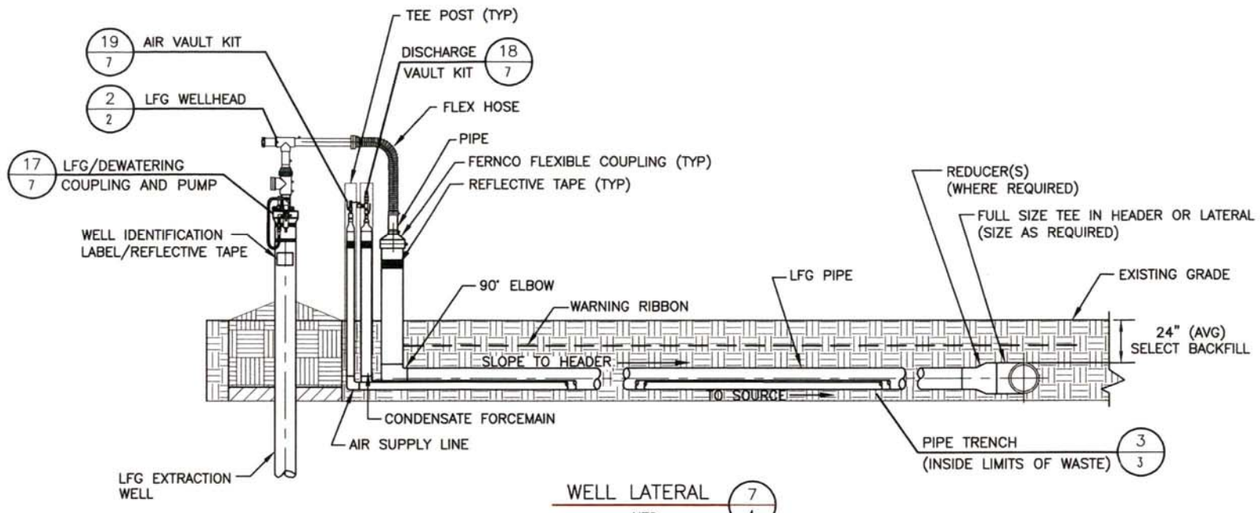
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.

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8/13/2025

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Weaver Consultants Group CERTIFICATE OF AUTHORIZATION NO. 1871			WWW.WCGRP.COM DRAWING 3

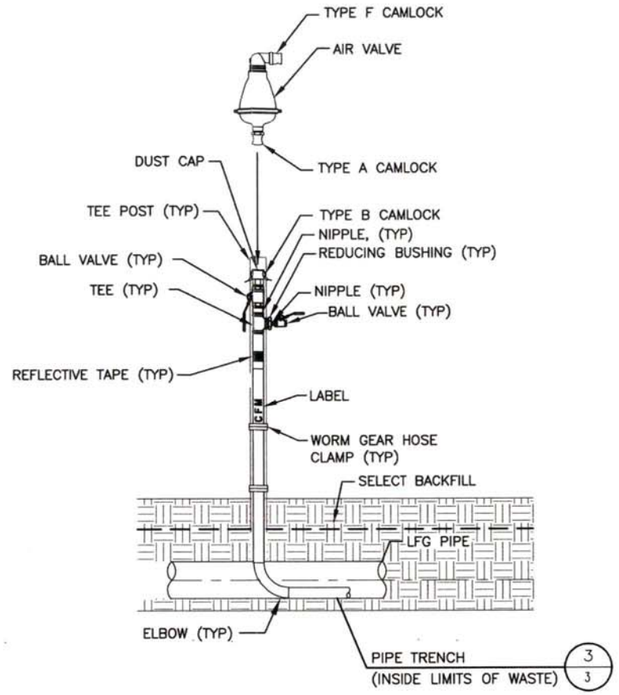
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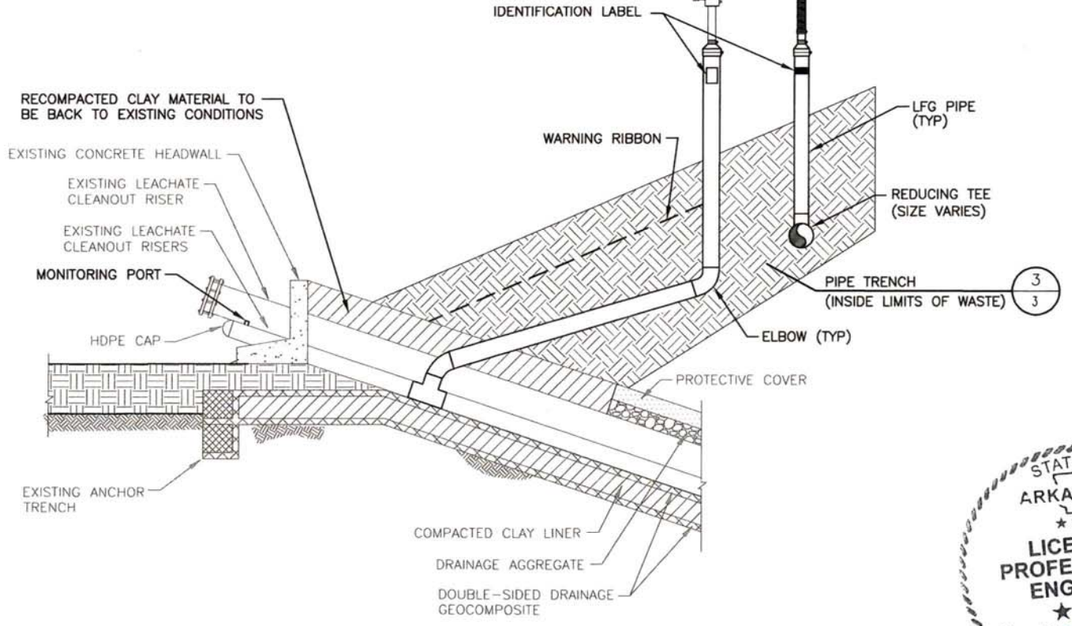
WELL LATERAL 7/4
NTS

NOTE:
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.



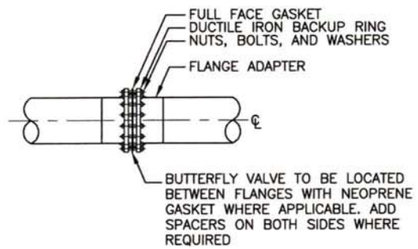
AIR RELEASE VALVE 8/3
NTS

NOTE:
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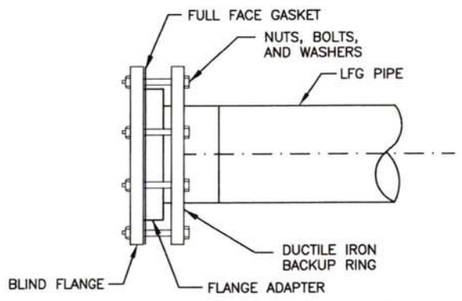
LFG PIPING TO LCR CONNECTION 9/4
NTS

NOTE:
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.



FLANGE CONNECTION 10/4
NTS

NOTE:
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.



BLIND FLANGE 11/4
NTS

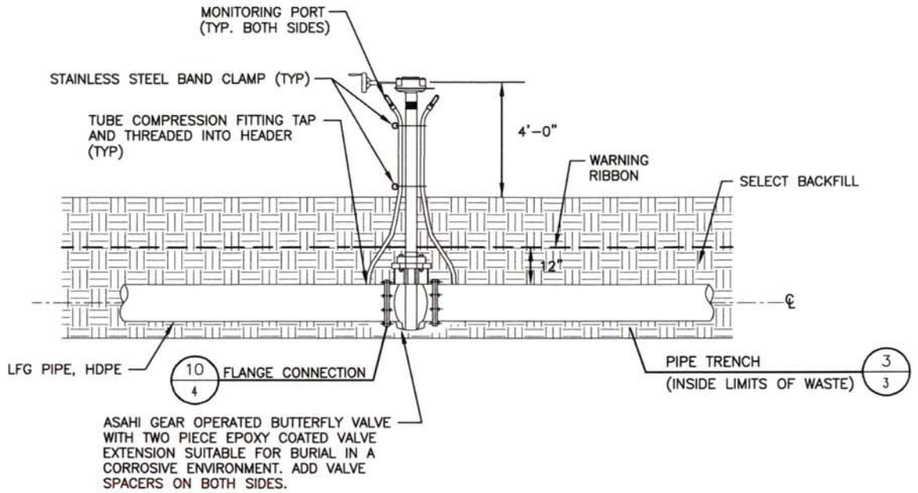
NOTE:
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.

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No. 19714
COLIN G. MOTT
8/13/2025

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DATE: 08/2025 FILE: 9943-007-52 CAD: 4-PIPING DETAILS.DWG	DRAWN BY: IOS DESIGN BY: LKS REVIEWED BY: CGM	REVISIONS NO. / DATE / DESCRIPTION	LEGACY LANDFILL CRAIGHEAD COUNTY, ARKANSAS
Weaver Consultants Group CERTIFICATE OF AUTHORIZATION NO. 1871			WWW.WCGRP.COM / DRAWING 4

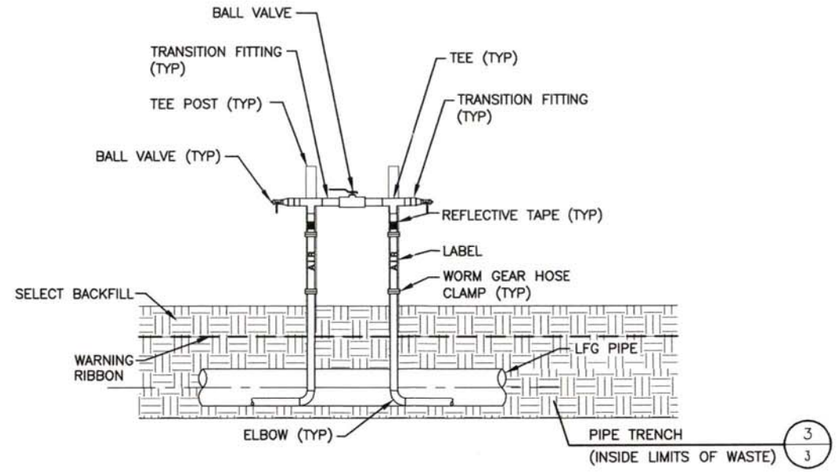
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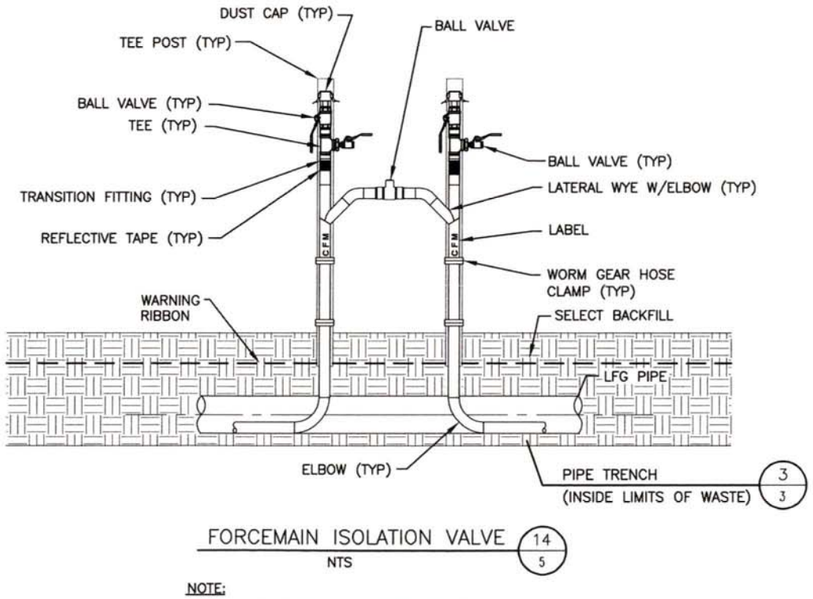
LFG ISOLATION VALVE 12/5
NTS

NOTE:
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.



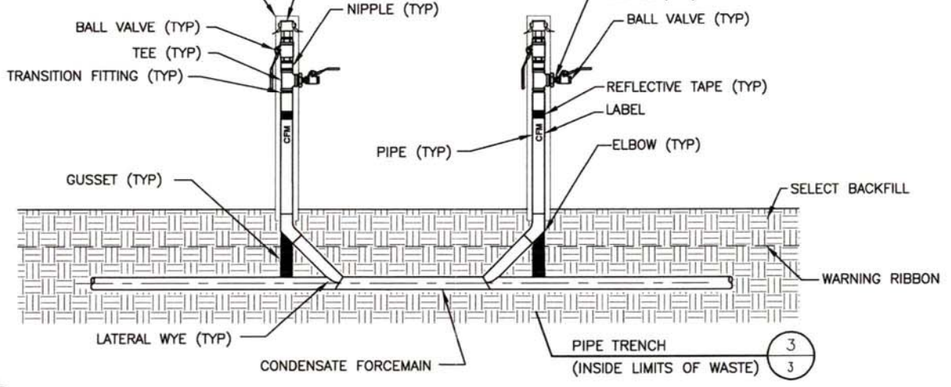
AIR ISOLATION VALVE 13/5
NTS

NOTE:
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.



FORCEMAIN ISOLATION VALVE 14/5
NTS

NOTE:
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.



FORCEMAIN CLEANOUT RISER 15/5
NTS

NOTE:
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.

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DATE: 08/2025
FILE: 9943-007-52
CAD: 5-VALVE DETAILS.DWG

DRAWN BY: IOS
DESIGN BY: LKS
REVIEWED BY: CGM

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CERTIFICATE OF AUTHORIZATION NO. 1871

PREPARED FOR
VBM LEGACY, LLC

REVISIONS

NO.	DATE	DESCRIPTION

2025 LFG SYSTEM EXPANSION VALVE DETAILS

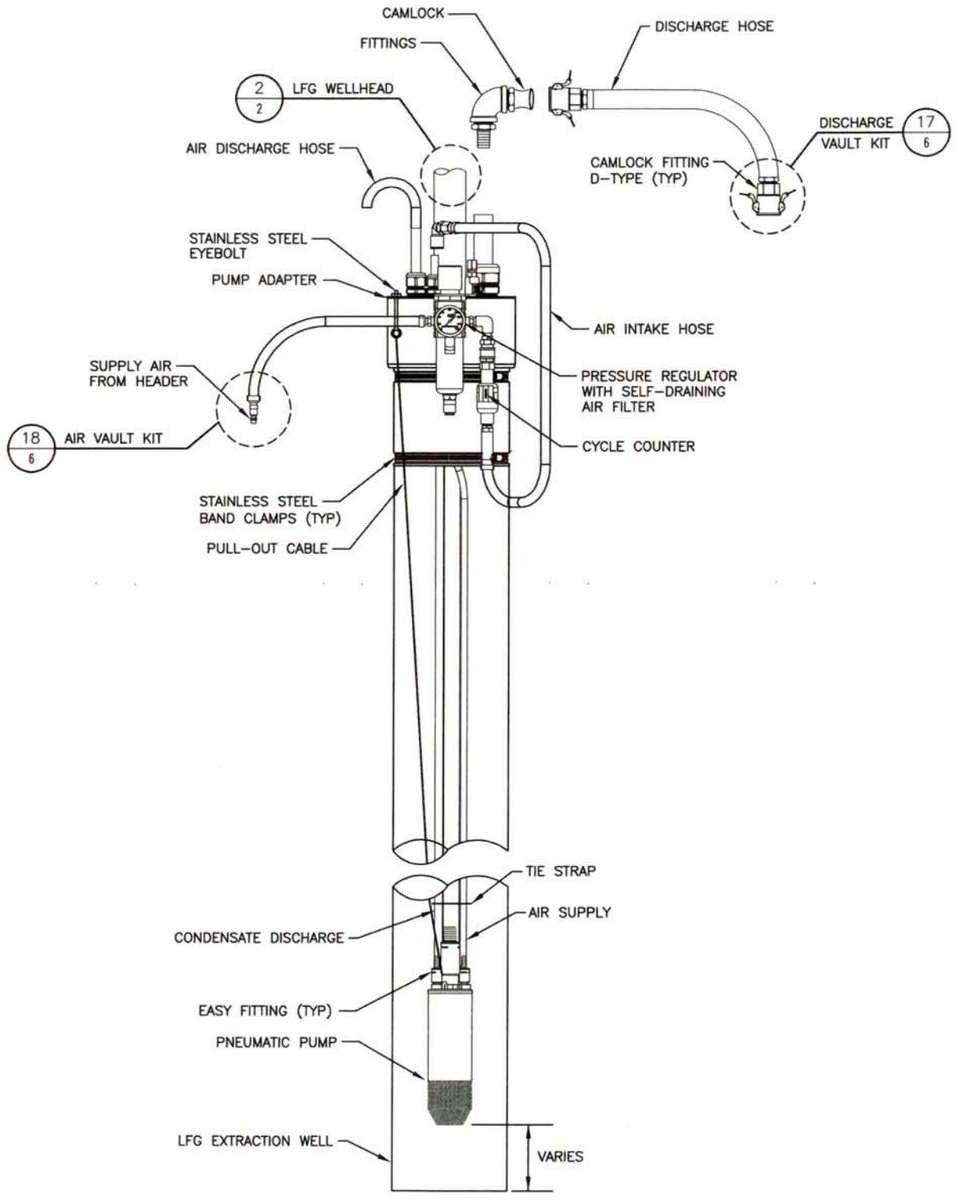
LEGACY LANDFILL
CRAIGHEAD COUNTY, ARKANSAS

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DRAWING 5

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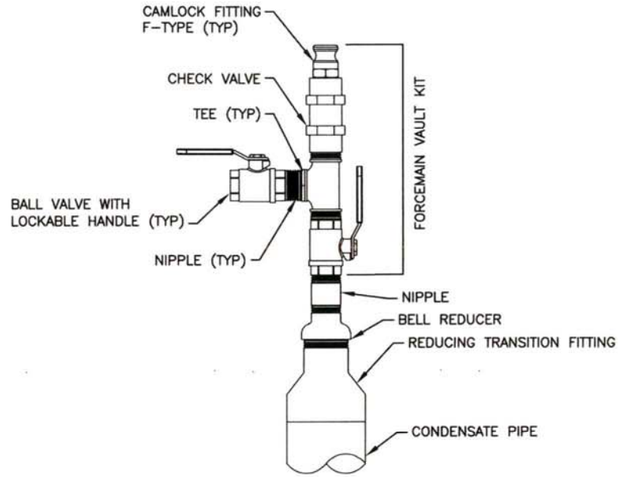
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LFG/DEWATERING COUPLING AND PUMP 16/6
NTS

NOTE:

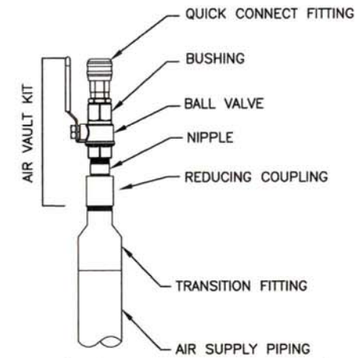
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.



DISCHARGE VAULT KIT 17/6
NTS

NOTE:

1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.



AIR VAULT KIT 18/6
NTS

NOTE:

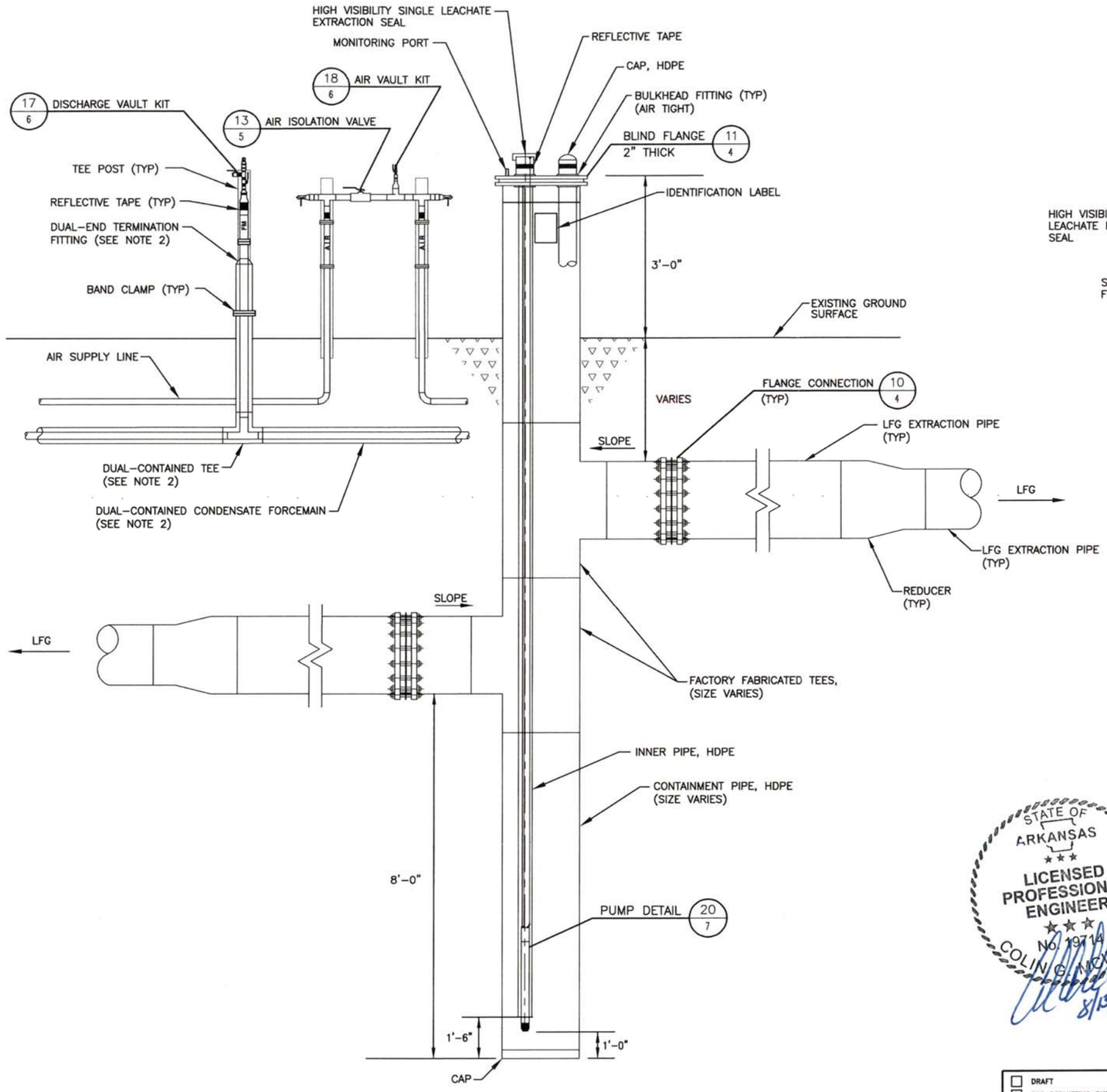
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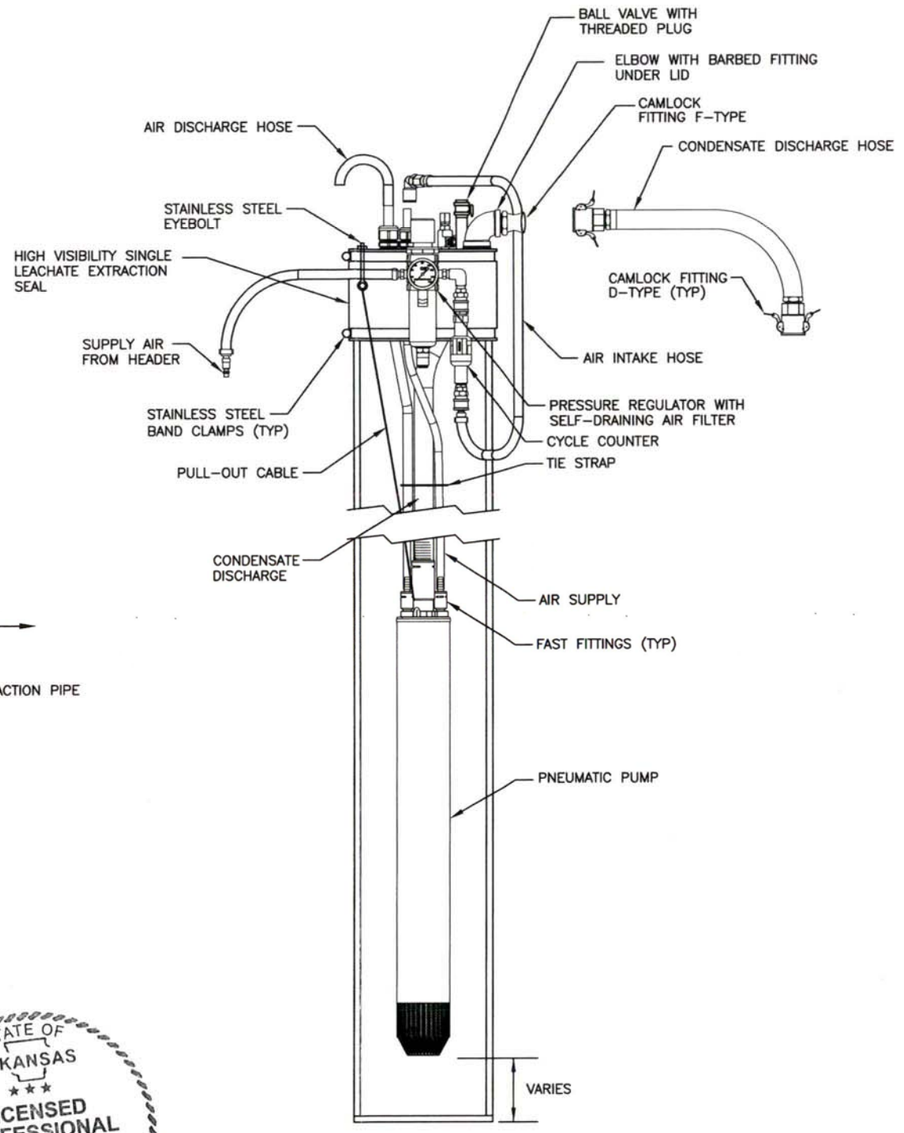
☐ DRAFT ☒ FOR PERMITTING PURPOSES ONLY ☐ ISSUED FOR CONSTRUCTION		PREPARED FOR VBM LEGACY, LLC	2025 LFG SYSTEM EXPANSION PUMP DETAILS
DATE: 08/2025 FILE: 9943-007-52 CAD: 6-PUMP DETAILS.DWG	DRAWN BY: IOS DESIGN BY: LKS REVIEWED BY: CGM	REVISIONS NO. / DATE / DESCRIPTION	LEGACY LANDFILL CRAIGHEAD COUNTY, ARKANSAS
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CONDENSATE SUMP 19 / 7
NTS



PUMP DETAIL 20 / 7
NTS

NOTE:
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE

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8/13/2025

NOTES:
1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE
2. DUAL CONTAINED PIPING AND FITTINGS ONLY APPLICABLE TO SUMPS INSTALLED OUTSIDE LIMITS OF WASTE. SUMPS INSTALLED INSIDE LIMITS OF WASTE TO BE SINGLE CONTAINED PIPING AND FITTINGS.

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- [ ] DRAFT
- [x] FOR PERMITTING PURPOSES ONLY
- [ ] ISSUED FOR CONSTRUCTION

DATE: 08/2025
FILE: 9943-007-52
CAD: 7-CONDENSATE SUMP DETAILS.DWG
DRAWN BY: IOS
DESIGN BY: LKS
REVIEWED BY: CGM

Weaver Consultants Group
CERTIFICATE OF AUTHORIZATION NO. 1871

PREPARED FOR
VBM LEGACY, LLC

REVISIONS

NO.	DATE	DESCRIPTION

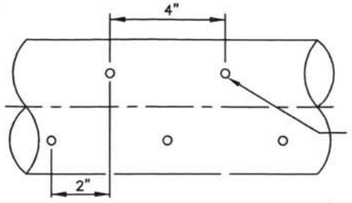
2025 LFG SYSTEM EXPANSION CONDENSATE SUMP DETAILS

LEGACY LANDFILL
CRAIGHEAD COUNTY, ARKANSAS

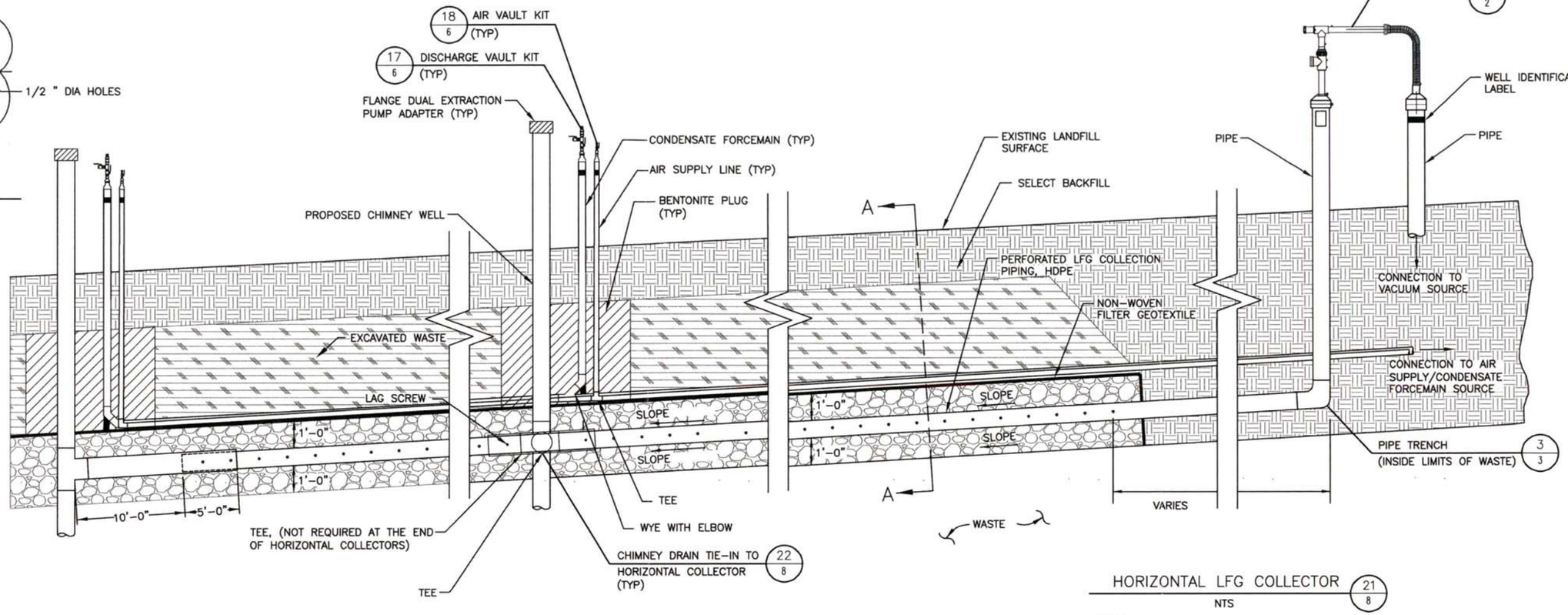
WWW.WCGRP.COM

DRAWING 7

P:\LFG\Projects\BioMethane Partners\Legacy Landfill\Const Notice\Minor Mod\PERMIT DRAWINGS\7-SUMP DETAILS.dwg, 8/7/2025 2:45:13 PM, rsellers, 1:2



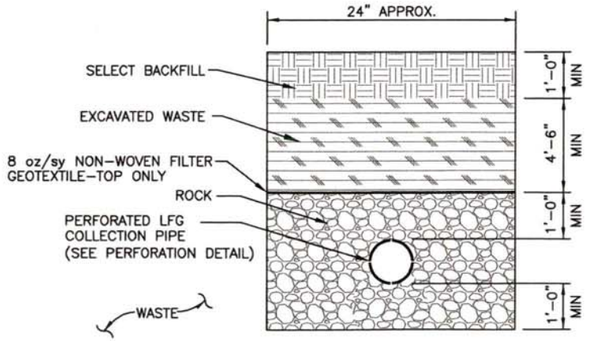
LFG COLLECTION PIPE PERFORATION DETAIL
NTS



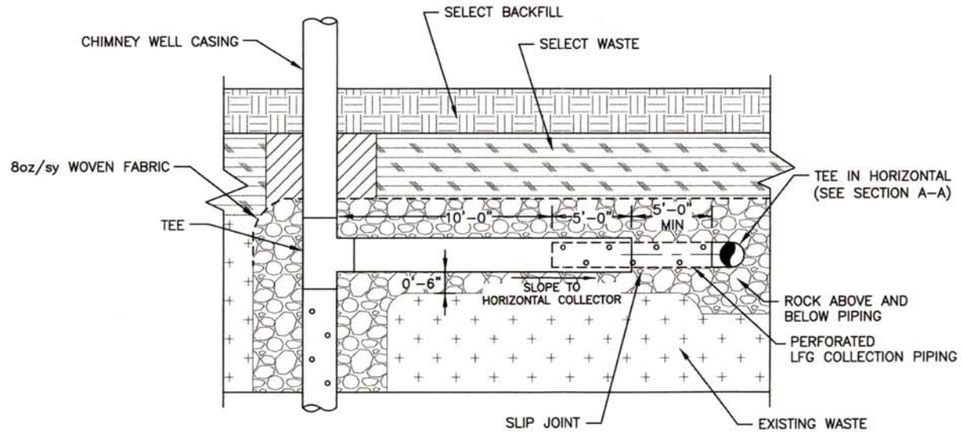
HORIZONTAL LFG COLLECTOR 21/8
NTS

NOTE:

1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.



SECTION A-A
NTS



CHIMNEY DRAIN TIE-IN TO HORIZONTAL COLLECTOR 22/8
NTS

NOTE:

1. ALL SIZES AND DIMENSIONS ARE APPROXIMATE.

STATE OF ARKANSAS
LICENSED PROFESSIONAL ENGINEER
No. 19714
COLIN G. MCINNES
8/13/2025

☐ DRAFT ☒ FOR PERMITTING PURPOSES ONLY ☐ ISSUED FOR CONSTRUCTION	PREPARED FOR VBM LEGACY, LLC	2025 LFG SYSTEM EXPANSION HORIZONTAL LFG COLLECTOR DETAILS LEGACY LANDFILL CRAIGHEAD COUNTY, ARKANSAS
DATE: 08/2025 FILE: 9943-007-52 CAD: 8-HZ COLLECTOR DETAILS.DWG DRAWN BY: IOS DESIGN BY: LKS REVIEWED BY: CGM	REVISIONS: NO. / DATE / DESCRIPTION	
Weaver Consultants Group CERTIFICATE OF AUTHORIZATION NO. 1871		WWW.WCGRP.COM — DRAWING 8

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ATTACHMENT 2

MINOR PERMIT MODIFICATION APPLICATION FORM

SOLID WASTE FACILITY
PERMIT MODIFICATION APPLICATION

DIVISION OF ENVIRONMENTAL QUALITY
OFFICE OF LAND RESOURCES
5301 NORTHSHORE DRIVE
NORTH LITTLE ROCK, ARKANSAS 72118

Note: This modification application is to be used for all modifications to solid waste disposal and processing facilities. The Division will classify this modification as major or minor in accordance with the provisions of Section 22.308 of Arkansas Pollution Control and Ecology Commission (APC&EC) Regulation No. 22. Major modifications will be subject to the provisions of APC&EC Regulation No. 8.

I. FACILITY TYPE

X Class 1 Landfill	_____Transfer Station (TS)
_____Class 4 Landfill	_____Composting Facility (Y, O or S)
_____Class 3C Landfill	_____Solid Waste Recovery Facility (WRF)
_____Class 3N Landfill	_____Construction and Demolition Recovery Facility (CDRF)
_____Class 3T Landfill	

II. FACILITY IDENTIFICATION

Facility Name: Craighead County SWDA Permit Number: 0254-S1-R4 AFIN: 16-00199

Facility Address: 238 County Road 476

City: Jonesboro State: AR Zip: 72404

County: Craighead Telephone Number: (870) 972-6353 Fax Number: (870) 972-0495

III. APPLICANT

Applicant Name: Craighead County SWDA

Applicant Address: P.O. Box 16777

City: Jonesboro State: AR Zip: 72403

Contact Person: Angela Sparks Phone Number: (870) 972-6353

Contact Person Email Address: angela@ccswda.com

PERMIT HISTORY

(Complete for each permit and modification to date)

	Number	Date Issued
Permit Number:	0254-S	May 4, 1990
Modification #1:	0254-SR1	November 13, 1991
Modification #2:	0254-SR-2	March 13, 1992
Modification #3:	0254-S1-R2	October 17, 1994
Modification #4:	0254-S1-R3	July 7, 2004
Modification #5	0254-S1-R4	May 2, 2012

MODIFICATION DESCRIPTION

(Complete each part below as it applies to this modification - if an item doesn't apply, mark it "N/A")

CHANGE IN PERMITTED CAPACITY *(Specify whether yards or tons)* **- N/A**

Original Cubic Yards_____
(This includes the volume of solid waste and any daily or intermediate soil cover)

Modified Cubic Yards_____

Cubic Yards Increase (Decrease)_____

SITE LIFE & SERVICE AREA - N/A

Current Service Area_____

_____

Current Tons per year through the gate_____(tons/year)

Current Landfill Utilization Rate_____(cu. yards/year)

Estimated remaining site life (after this modification)_____years

CHANGE IN PERMITTED DISPOSAL ACREAGE - N/A

Original Site Acres_____

Modified Site Acres_____

Site Acres Increase (Decrease)_____

CHANGE IN OPERATING PROCEDURES *(Provide brief description of each proposed modification)*

This minor modification does not include any changes to the site's operating procedures.

CHANGE IN FACILITY DESIGN *(Provide brief description of each proposed modification*

The proposed minor modification includes voluntarily expansion to the existing gas collection and control system for environmental control.

REASON FOR MODIFICATION *(Check one or specify below)*

Change in Regulation _____

Additional Site Life _____

Improve Site Operations _____

Correct Past Violation _____

Other *(Specify)* X

Voluntarily expansion to the existing gas collection and control for environmental control.

DRAWING REVISIONS

(Identify below each drawing that was revised or added as a result of this modification. Each revised or added drawing should be included as an attachment to this application.)

Drawing Number	Title	Date	Revision Number
Drawings 0 - 8	Permit Drawings	8/13/2025	N/A

OPERATING NARRATIVE REVISIONS

(Identify below each change to the operating narrative as a result of this modification. Revised narrative pages should be included as an attachment to this application. Deletions from the previous narrative should be indicated by strikeout, additions should be redlined.)

Page Number	Change Description

SUPPLEMENTAL DATA SUBMITTED

(Any report, study, data, information, etc. that was not part of previous permit documents should be identified below. In addition, any data identified below should be included as an attachment to this Application).

Description

The attached minor permit modification text and a drawing.

SIGNATURE AND CERTIFICATION

(The application should be signed by an authorized representative of the applicant as well as the Consultant that prepared this application. By signing below, the representatives certify that all the information in this modification is accurate and truthful.)

APPLICANT

Angela L Sparks

Chief Executive Officer	Angela Sparks	08/13/2025
Signature & Title	Printed Name	Date

ENGINEER/CONSULTANT

STATE OF ARKANSAS ★★★ LICENSED PROFESSIONAL ENGINEER ★ No. 18714 COLIN C. MCINNES

CERTIFICATE OF AUTHORIZATION WEAVER CONSULTLANTS GROUP LLC No. 1871 ARKANSAS

Principal	Colin McInnes, PE,	8/13/2025
Signature & Title	Printed Name	Date

CONFIDENTIALITY: *This application shall be available for public inspection, provided, however, that the Division shall not disclose, except to authorized persons, any information which the Director determines is entitled by law to protection as trade secrets without the consent of the applicant. Trade secrets shall not include the name and address of the applicant, nor any information necessary, as determined by the Director, for the public to evaluate the hazards associated with the proposed operation, nor any other information required by law to be available to the public.*

ORIGIN ID:GRKA (817) 735-9770
COLIN MCINNES, P.E.
WEAVER CONSULTANTS GROUP, LLC
6420 SOUTHWEST BLVD.
SUITE 206
FORT WORTH, TX 76109
UNITED STATES US

SHIP DATE: 14AUG25
ACTWGT: 0.50 LB
CAD: 251233438/INET4535

BILL SENDER

TO **RON ALLEN**
ARKANSAS DEQ
5301 NORTHSHORE DRIVE

NORTH LITTLE ROCK AR 72118
(501) 682-0744 REF: 9943-007-52-00 SW
INV:
PO: DEPT:

58GJ4/A855/59F2

FedEx Express

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ARKANSAS DEQ
5301 NORTHSHORE DR
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