Haley Griffith (adpce.ad)

Subject: RE: 2025 Craighead County Solid Waste Disposal Authority Legacy Landfill - Issues on 2025 AEIR

From: Paul Crawford <pcrawford@olsson.com>
Sent: Wednesday, July 15, 2026 11:53 AM
To: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>
Subject: Re: 2025 Craighead County Solid Waste Disposal Authority Legacy Landfill - Issues on 2025 AEIR

CAUTION: External Email

Richard,

Per your request, I have reviewed your comments on the 2025 Craighead County Solid Waste Disposal Authority Legacy Landfill AEIR. Please see my responses in RED to your questions / comments below.

1. The projected date of the new cell is the cell we have already approved so just put a best guess on the next cell to be opened (I believe it would be cell 6) I have updated item 1(b) to 2030 to include Cell 5 disposal capacity (see attached page 1 of the AEIR form).
2. On the lifetime of the entire permitted landfill please add in the area for Cell 5 I updated item 2(a) to include the disposal capacity in Cells 1 and 2 at the time of the December 2025 survey (104,500 cy) plus the estimated disposal capacity for Cell 5 (800,000 cy) totaling approximately 904,500 cy . In addition, I updated item 2(c) to include the waste capacity of Cell 5 (see attached page 1 of the AEIR form).
3. Please confirm the 25.4 acres under final cover are under final certified cover so we do not need them in the closure estimates. I have confirmed that the area that has final cover installed is 25.4 acres. The final cover for portions of Cell 4 was installed in 2016/2017 and the CQA report for this project was submitted to ADEQ in April 2017 (DIN 71505). The final cover for the remainder of Cell 4 and the western half of Cell 3 was installed in 2021 and the CQA report for this project was submitted to ADEQ in March 2021 (DIN 79739).
4. Please clarify what year dollars the estimates are in and inflate as needed. Per your request, I have updated the closure / post-closure cost estimate to be 2024 dollars, which were used for the financial assurance calculations included in the 2024 major permit modification application. Because the costs were based on 2024 dollars, the closure and post-closure costs for the 2025 AEIR were adjusted with the inflation factor for 2025 costs (see attached Financial Assurance Costs).
5. Please clarify that it cost $650 per year for each well for gas monitoring. The cost per probe in the prior submittal was based on the total annual cost. I have modified the unit rate for the probes to be based on cost per probe per event. The total annual cost remains the same - $6,500. This edit is reflected in the attached updated financial assurance costs.

Please let me know if you have any further questions on this report.

Paul

From: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>
Sent: Monday, July 13, 2026 4:06 PM

To: Paul Crawford <pcrawford@olsson.com>
Subject: 2025 Craighead County Solid Waste Disposal Authority Legacy Landfill - Issues on 2025 AEIR

This Message Is From an External Sender
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.

Thanks for taking my call. Please make respond to my concerns listed below within 14 calendar days of this email. Feel free to contact me using the information provided below.

1. The projected date of the new cell is the cell we have already approved so just put a best guess on the next cell to be opened (I believe it would be cell 6)
2. On the lifetime of the entire permitted landfill please add in the area for Cell 5
3. Please confirm the 25.4 acres under final cover are under final certified cover so we do not need them in the closure estimates.
4. Please clarify what year dollars the estimates are in and inflate as needed.
5. Please clarify that it cost $650 per year for each well for gas monitoring.

Respectfully

Richard Bennett, PE
Permit Engineer
E&E | Environmental Quality | Land Resources
e: richard.bennett@arkansas.gov
t: 501-682-0861

ANNUAL ENGINEERING INSPECTION REPORT (AEIR) FORM Reporting Year: 2025

Note: Check applicable landfill class. **Class 1 (Reg 22.423(b)) X , Class 3 (22.522(a)) ____ , Class 4 (22.619(b)) _____**

Facility Name: CCSWDA Legacy Landfill AFIN: 16-00199 Permit #: 0254-S1-R5 Landfill Class: 1

Report Submittal Date: March 31, 2026 Date of Landfill Site Inspection by Certifying Engineer: March 10, 2026

Complete the form as indicated
Instructions are bolded and italicized.

COLUMN TO BE COMPLETED BY REPORTER

Item	Regulation Reference	Item Description	Report Information/Comments/Remarks	Attachment Reference
1	22.423(b)(1) 22.522(a)(1) 22.619(b)(1)	Remaining volume in current cell.	a) 104,500 (Cells 1 and 2) cubic yards	
		Projected date of opening new cell.	b) Date: Cell 6 - 2030	
2	22.423(b)(2) 22.522(a)(2) 22.619(b)(2)	Remaining volume of all permitted units.	a) 904,500 cubic yards (104,500 CY Cells 1 and 2 at the time of survey – Dec 2025, plus approximately 800,000 for Cell 5).	
		Total air space used during the reporting period.	b) 184,500 cubic yards	
		Estimated remaining site life (years) based on utilization rate during the reporting period. ***Note: Itemize current permitted unit/cell information - use attachment if necessary.***	c) Landfill Unit/Cell remaining life: Landfill unit/cell Cell 1 , 0.5 years. Landfill unit/cell Cell 2 , 0.0 years. Landfill unit/cell Cell 3 , 0.0 years. Landfill unit/cell Cell 4, Unit 1 , 0.0 years. Landfill unit/cell Cell 4, Unit 2 , 0.0 years. Landfill unit/cell Cell 4, Unit 3 , 0.0 years. Landfill unit/cell Cell 5 , 4.0 years. d) Entire permitted landfill: 4.5 years remaining life.	
3	22.423(b)(3) 22.522(a)(3) 22.619(b)(3)	Documentation of fill progression in compliance with permit plans, specs and operating plan and narrative.	a) Progression narrative: The final cover system has been installed on Cell 4 and the western half of Cell 3. The facility was disposing waste in the northern portion of Cell 1 at the time of the site inspection. Cell 1 served as the primary	

CRAIGHEAD COUNTY SOLID WASTE DISPOSAL AUTHORITY

LEGACY LANDFILL

ANNUAL ADJUSTED CLOSURE AND POST CLOSURE CARE COSTS

Report Year	ADEQ Annual Inflation Rate, %	Estimated Closure Costs	Adjusted Estimated Closure Costs	Estimated Post Closure Costs	Adjusted Estimated Post Closure Costs	Estimated Total Financial Assurance [1]
2023	1.065	$3,058,100	$3,256,900	$2,017,200	$2,148,400	$3,686,580
2024	1.027	$3,058,100	$3,344,900	$2,017,200	$2,206,500	$3,786,200
2025 [2]	1.025	$3,925,920	$4,024,100	$2,716,500	$2,784,500	$4,581,000

Notes:

1. Accounts for 80% reduction in Post Closure Costs
2. Closure and Post-Closure Care estimates updated as part of 2024 major permit modification.

CLOSURE COST ESTIMATE [1]
CRAIGHEAD COUNTY SOLID WASTE DISPOSAL AUTHORITY
LEGACY LANDFILL

Cells Open in Largest Area Scenario: Cell 8 constructed and Cells 5, 6, 7 partially closed without final cover
Largest Open Area (Acres): 32.1

ITEM	QUANTITY	UNIT	UNIT PRICE	AMOUNT
Surface Preparation	32.1	AC	$2,500	$80,250
Gas Venting Layer (Optional) [2]	N/A	N/A	N/A	$0
Geosynthetic Clay Liner	1,398,300	SF	$0.75	$1,048,725
Synthetic Liner (40 mil LLDPE)	1,398,300	SF	$0.45	$629,300
Geocomposite Drainage Layer	1,398,300	SF	$0.70	$978,900
Protective Cover (12")	51,800	CY	$5.50	$284,900
Vegetation/Soil Top Layer (6") [3]	25,900	CY	$7.00	$181,300
Seeding/Fertilizing/Mulching	32.1	AC	$4,000	$128,400
Erosion Control	32.1	AC	$1,650	$52,965
Stormwater Control Facilities	1	LS	$100,000	$100,000
Preparation of Contract Documents	1	LS	$75,000	$75,000
Quality Assurance/Quality Control	32.1	AC	$5,500	$176,550
Surveying	32.1	AC	$300	$9,630
Certification	1	LS	$30,000	$30,000
Let-Down Structures	1	LS	$150,000	$150,000
TOTAL				**$3,925,920**

Notes:
Based on 2024 dollars.

Quantities and Costs have been rounded to allow for variance in estimates.
1 - Costs are for a third-party firm to close the current area of the landfill that is open. This includes construction and consulting fees.
2 - Gas Vent System is not included in the final cover system design.
3 - The Erosion Layer costs are included with the Vegetation/Soil Top Layer.

Print Date: 7/15/2026

POST-CLOSURE CARE COST ESTIMATE
CRAIGHEAD COUNTY SOLID WASTE DISPOSAL AUTHORITY
LEGACY LANDFILL

TABLE A ANNUAL MAINTENANCE/REPAIRS (SUBSIDENCE, SETTLING, EROSION, ROADS, ETC.)				
ITEM	**QUANTITY**	**UNIT**	**UNIT PRICE**	**AMOUNT**
Labor (2 people x 8 hr/day x 2 days/yr)	32	Hours	$20.00	$640
Equipment- Dozer	16	Hours	$120	$1,920
Dump Truck	16	Hours	$80	$1,280
Loader	16	Hours	$110	$1,760
Stormwater NPDES Costs	15,307,000	GAL	$0.001	$14,000
Stormwater Sampling Services	1	LS	$6,500	$6,500
TOTAL ESTIMATED ANNUAL MISC. REPAIRS				**$26,100**

TABLE B ANNUAL MAINTENANCE/OPERATION OF LEACHATE COLLECTION SYSTEM				
ITEM	**QUANTITY**	**UNIT**	**UNIT PRICE**	**AMOUNT**
Capital Cost of System = ($60,000; Estimated Life = 30 years)				
Annual Maintenance and Repair of System	1	LS	$2,500.00	$2,500
Leachate Generation/Yr. (Gallons)	15,000	GAL	$0.10	$1,500
Annual Transportation Costs	15,000	GAL	$0.30	$4,500
Annual Treatment Costs	15,000	GAL	$0.15	$2,250
TOTAL ESTIMATED ANNUAL LEACHATE SYSTEM O&M				**$10,750**

Based on 2024 estimated construction costs.

POST-CLOSURE CARE COST ESTIMATE
CRAIGHEAD COUNTY SOLID WASTE DISPOSAL AUTHORITY
LEGACY LANDFILL

TABLE C ANNUAL MAINTENANCE/OPERATION OF GROUNDWATER MONITORING SYSTEM				
ITEM	**# of Wells**	**UNIT**	**Cost/Well**	**AMOUNT**
Capitol Cost of System (15 Wells at $4,500 = $72,000, Assume 30 year life)				
Annual Maintenance and Repair (1/30 of Capital Cost)				$2,700
Annual Sampling Costs (2/year)	15	EA	$350	$10,500
Annual Laboratory Analysis (2/year)	15	EA	$350	$10,500
Statistical Analysis (2/year)	15	EA	$350	$10,500
TOTAL ESTIMATED ANNUAL GW MONITORING SYSTEM COSTS				**$34,200**

TABLE D ANNUAL MAINTENANCE/OPERATION OF GAS MONITORING SYSTEM				
ITEM	**# of Locations**	**UNIT**	**Cost/Probe/Event**	**AMOUNT**
Capital Cost of System = 10 probes at $2,500 = $25,000				
Annual Maintenance and Repair (1/30 of Capital Cost)				$1,000
Annual Monitoring Costs (4 events/year)	10	EA	$162.50	$6,500
TOTAL ESTIMATED ANNUAL GAS MONITORING SYSTEM COSTS				**$7,500**

TABLE E ANNUAL MAINTENANCE/OPERATION OF GAS COLLECTION SYSTEM				
ITEM				**AMOUNT**
Capital Cost of System = 57 extraction wells at $5,750 = $327,750				
Operation and Maintenance (1/30 of Capital Cost)				$12,000
TOTAL ESTIMATED ANNUAL GAS COLLECTION SYSTEM COSTS				**$12,000**

TOTAL ESTIMATED ANNUAL POST-CLOSURE CARE COSTS:	**$90,550**
TOTAL ESTIMATED POST-CLOSURE CARE COSTS:	**$2,716,500**