Haley Griffith (adpce.ad)

Subject: RE: Perry County 2023 AEIR - Permit 0264-S

From: Bardella, Tony L <Tony.Bardella@terracon.com>
Sent: Thursday, July 31, 2025 11:24 AM
To: Bennett, Richard <BENNETT@adeq.state.ar.us>
Cc: McCormick, Dave C. <Dave.McCormick@terracon.com>; Anna Foreman <aforeman@bscasphalt.com>
Subject: Perry County 2023 AEIR - Permit 0264-S

Richard,

Please see the attached 2024 AEIR for Perry County Class 4 Landfill.

Thank you,

Tony Bardella
Staff Engineer I Solid Waste Services
Terracon
25809 I-30 South I Bryant, Arkansas 72022
D (501) 943-1049 I M (501) 794-9466
Tony.Bardella@terracon.com I Terracon.com

Terracon provides environmental, facilities, geotechnical, and materials consulting engineering services delivered with responsiveness, resourcefulness, and reliability.

Private and confidential as detailed here (//www.terracon.com/disclaimer). If you cannot access the hyperlink, please e-mail sender.

2024 Annual Engineering Inspection Report

Perry County Class 4 Landfill

Permit No. 0264-S

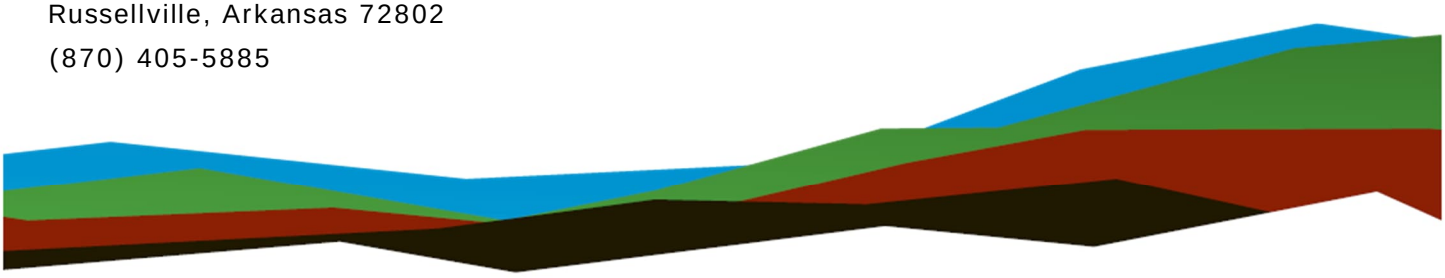
AFIN: 53-00029

July 25, 2025 | Terracon Project 35257143

Prepared for:

BLACKSTONE
CONSTRUCTION LLC.
RUSSELLVILLE, AR

Blackstone Construction LLC.
444 Hedgepath Rd.
Russellville, Arkansas 72802
(870) 405-5885



Terracon

Nationwide
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- Facilities
- Environmental
- Geotechnical
- Materials

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ADEQ Annual Engineering Inspection Report Form 1

List of Attachments

Attachment A Photographic Logs. .....

Attachment B Updated Drawings. .....

Attachment C Leachate Analytical Report. .....

Attachment D Updated Drawings. .....

PROFESSIONAL ENGINEER'S CERTIFICATION

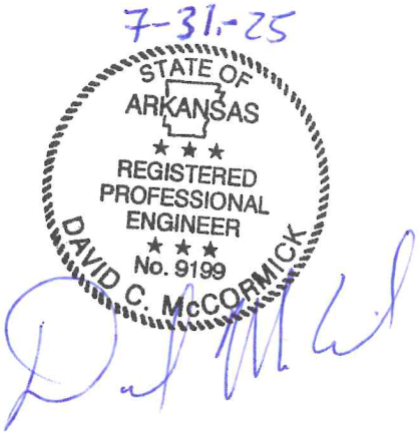
As required by *Arkansas Regulation 22* (*Reg.22.423*), representatives from Terracon Consultants, Inc. inspected the Perryville County Class 4 Landfill (Facility) on July 18, 2025. During this inspection, general Facility operating practices and procedures in relation to *Arkansas Regulation 22* and the Facility's permit were reviewed. Based on site visits, review of the facility operating records, and discussions with the landfill owner/operator, it is my professional opinion that the Facility is being operated and maintained in compliance with *Arkansas Regulation 22* and the Facility's solid waste permit. This opinion is contingent on the fact that all information supplied to the signatory authority as of the date of this certification is unquestionably accurate and provided in good faith.

7/31/25

David C. McCormick, P.E.
Arkansas Professional Engineer No. 9199

Date

7-31-25





ANNUAL ENGINEERING INSPECTION REPORT (AEIR) FORM Reporting Year: 2024

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

Facility Name: Perry County Landfill AFIN: 53-00029 Permit #: 0264-S Landfill Class: 4

Report Submittal Date: July 25 , 2025 Date of Landfill Site Inspection by Certifying Engineer: July 18, 2024

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) 34,162 cubic yards	
		Projected date of opening new cell.	b) Date: N/A *(The site is in the process of a change in ownership. The facility does not currently have plans to open a new cell)*	
2	22.423(b)(2) 22.522(a)(2) 22.619(b)(2)	Remaining volume of all permitted units.	a) 34,162 cubic yards	
		Total air space used during the reporting period.	b) 0 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 Landfill, 25.9 years. Landfill unit/cell _____, ___ years. Landfill unit/cell _____, ___ years. d) Entire permitted landfill: 25.9 years remaining life. *(Remaining life calculations based on 2019 reported airspace usage of 1323 cy)*	
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. ***Note: Provide narrative regarding fill progression during the reporting period. Be specific about landfill unit/cell designations (example: Cell 1, Phase A completely filled; Cell 2, Phase A, 50% full, being filled south to north as of December 31). Specifically note any overfill conditions.***	a) Progression narrative: No waste was placed in 2024. Previously the Landfill fill progression was generally from the north to the south in the current landfill footprint. Waste was last being area filled on top of the filled trenches in the southwest portion of the landfill. The Landfill will be filled to the maximum capacity that can be reached without affecting the efficiency of waste placement.	
4	22.423(b)(4) 22.522(a)(4) 22.619(b)(4)	Documentation of compliance with regulatory operating requirements, permit conditions, approved operating plan, and other applicable regulations.	a) Weekly/monthly operational logs exist (Y/N)? Y b) Photos of AEIR inspection attached (Y/N)? Y c) Waste volume in and out records exist (Y/N)? Y d) Unauthorized waste forms exist (Y/N)? Y	**A**

		Note: Review current operating plans, and permit conditions. Include photographs of engineer's inspection as Attachment A. Check for weekly/monthly operational logs, waste volume records in and out of landfill, unauthorized waste form sheets, waste cover maintenance, stormwater reports to ADEQ, and wet weather repair information.	e) Daily/weekly cover adequate at time of inspection (Y/N)? Y f) Alternative Daily Cover (ADC) Plan located onsite (Y/N)? N/A Operations in compliance with ADC Plan (Y/N)? N/A g) Liquid Waste Management (LWM) Plan located onsite (Y/N)? N/A Operations in compliance with LWM Plan (Y/N)? N/A h) Liquids received to be bulked during reporting period: N/A gallons _____ tons i) Waste cover of inactive areas maintained adequately (Y/N)? Y j) Net amount of waste disposed in landfill during reporting period: 0 cubic yards 0 tons *(No waste was taken in during the 2024 reporting period)* k) Leachate head level less than 1' on liner at time of inspection (Y/N)? NA	
5	22.423(b)(5) 22.522(a)(5) 22.619(b)(5)	Updated contour map that depicts: ***Note: Provide updated drawing(s) and final cover permit drawing as Attachment B – discuss any discrepancies. Max. contour interval = 2 feet)***	a) Updated contour drawing attached (Y/N)? Y b) Final cover permit drawing attached (Y/N)? Y c) ***List all discrepancies here:*** N/A d) Is there an overfill condition (Y/N)? N	**B**
		(i) horizontal and vertical extent of active and inactive fill areas;		
		(ii) status of all permitted units/cells; ***(Note: Label all active (working face, bulking area, stockpiles), inactive, closed and interim cover areas)***.	a) Currently, does the facility have sufficient on-site quantities and types of soils for liner and cover construction of permitted units/cells (Y/N)? Y b) If not, where will deficiency shortfalls be obtained (be specific)? N/A c) Is the current Design Narrative earthwork balance accurate (Y/N)? N/A. The Landfill was designed and permitted prior to Subtitle D Regulations and as a result no design calculations were performed regarding soil balance.	
		(iii) survey grid (required by 22.426); ***Note: Include benchmarks and horizontal controls***		
		(iv) location of other visible surface features or improvements (e.g., roads, buildings, gas control systems, etc..); ***Note: Include leachate risers, manholes, monitoring wells, gas wells, etc.***		
		(v) the person responsible for gathering the survey data and the date survey data was taken to prepare the map. *Reminder: Reporting period is calendar year. Survey data should be collected to reflect the AEIR reporting period.*	a) Name: Terracon Consultants, Inc. b) Name of person using the data to produce contour map: Matt Acree c) Date survey data was collected: October 4, 2024	

6	22.423(b)(6) 22.522(a)(6) 22.619(b)(6)	Quantity, location, and characteristics of leachate collected, recirculated, and disposed. ***Note: Provide analytical report as Attachment C. Provide brief narrative on this form in space provided about leachate sources, how leachate is collected, measured and disposed. Also explained how the leachate head on the landfill liner is monitored and measured.***	a) Leachate Collected: N/A gallons b) Leachate Disposed: N/A gallons c) Leachate Recirculated: N/A gallons d) Leachate Recirculation Plan exists (Y/N)? N/A ADEQ approval Doc # ____ e) Leachate operating records exist (Y/N)? N/A f) Leachate analytical report attached (Y/N)? N/A g) Leachate narrative (collection, measurements and disposal): N/A h) Leachate narrative (verifying <1' head on liner system): N/A	**C**
7	22.423(b)(7) 22.522(a)(7) 22.619(b)(7)	Maintenance of stormwater controls and best management practices for erosion control. ***Note: List any upset conditions during the reporting period (i.e., washouts, etc…). Also, include narrative about vegetation maintenance and repair.***	a) ***Briefly list maintenance activities and upset conditions here:*** The Facility performs routine maintenance at the site to minimize erosion on the landfill faces. Routine maintenance includes removal of silt from the drainage ditches. When required, seeding and mulching are used to control erosion on the landfill slopes and drainage pathways. The site's Stormwater Sedimentation pond has been constructed.	
8	22.423(b)(8) 22.619(b)(8)	Status of capping and closure of completed areas. ***Note: List areas with acreage that have received interim or final cover. Include total landfilled area acreage not yet under final certified closed cover.*** ***Note: "Certified closed" means the facility has received an approval letter from ADEQ accepting the engineer's closure certification report.***	a) Lndfl unit/cell Trenches 1-10 , 2.2 acres. Intrm or Final Cover (I/F): I b) Lndfl unit/cell_____ , _____ acres. Intrm or Final Cover (I/F): ____ c) Acres of disposed waste not under final certified cover: 2.2 acres d) Acres of disposed waste area that have interim cover: 1.5 acres	
9	22.423(b)(9) 22.522(a)(8) 22.619(b)(9)	Status of remedial or corrective action activities. ***Note: List corrective action events during reporting period (e.g., seeps and erosion correction, leachate spills, unauthorized waste handling and removal, etc…), and indicate whether action was taken in response to an ADEQ inspection.*** ***Note: If trust fund financial assurance mechanism is utilized, the trust fund must fully fund all acres permitted.***	a) ***Briefly list corrective actions events here:*** During the four ADEQ quarterly inspections, no allegations of noncompliance were noted. b) Were any of the corrective actions taken in response to an ADEQ inspection (Y/N)? N c) Current status of corrective actions: N/A d) Did corrective actions permanently solve the conditions (Y/N)**?** N/A ***Explain briefly:***	
10	22.423(b)(10) 22.522(a)(9) 22.619(b)(10)	Updated Financial Assurance documentation as required by Chapter 14. ***Note: Include copy of most recent financial assurance documentation as Attachment D. Also, include updated closure and post closure cost estimated as an attachment– recommend to use the Closure Costs and Post-closure Care Costs Worksheet located at ADEQ - Solid Waste - Technical Branch Home Page*** ***Specific links to the worksheets:*** http://www.adeq.state.ar.us/solwaste/branch_technical/	a) Size of facility property under current permit? 4 acres b) Size of actual permitted disposal area? 3.4 acres c) What is the current total permitted disposal area that contains disposed waste but is not certified closed? 3.4 acres d) Updated closure cost estimate amount: $ 81,771 *(Costs were updated for the 2022 AEIR in 2023 dollars and remain the same for the 2023 AEIR. No inflation factor was applied for these estimates)* e) Is the closure cost estimate based on the largest area ever requiring closure (Y/N)? Y	**D**

		pdfs/closure_costs_worksheet.xlsx ***and*** http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/post_closure_care_costs_worksheet.xlsx***. . Show detailed calculations of cost items in tabular format with specific item breakdowns. Also, show source of unit cost information and/or inflationary factor adjustments – use ADEQ factors where applicable. If updated unit cost information is used instead of inflationary factors, show the source of unit cost information. Confirm estimates are based on largest area ever requiring final cover.***	f) Is the existing closure financial assurance adequate for acreage not yet certified closed (Y/N)?: Y g) Updated post closure care cost estimate amount: $ 33,254 *(Costs were updated for the 2024 AEIR and an inflation factor was applied for these estimates)* h) Is the existing post closure care financial assurance adequate for all permitted areas (Y/N)?: Y i) Is the financial assurance mechanism a trust fund (Y/N)? N j) Are the sources of information for updated unit cost line items shown on the cost estimate calculations (Y/N?): Unit Costs were not updated k) Do the unit cost items for soil cover material include actual third party cost of materials and labor (Y/N?): Y	
11	22.423(b)(11) 22.522(a)(10) 22.619(b)(11)	Revised or updated facility Closure Plan in accordance with Chapter 13. ***Note: Provide updated Closure Plan as Attachment E if facility obtained a permit modification during the reporting period that affects the closure and/or post closure care.***	a) Was an updated Closure Plan required during this reporting period (Y/N)?: N b) Is an updated Closure Plan attached herein (Y/N)? N	
12	22.423(b)(12) 22.522(a)(11) 22.619(b)(12)	Other items that affect compliance. ***Note: Include an ADEQ enforcement activity summary (solid waste, water, air, hazardous waste related) and , status of operating and permit fees. Also, include brief narrative concerning groundwater monitoring reports, landfill gas, leachate recirculation, alternate daily cover, etc…***	a) Are there current ADEQ enforcement actions (Y/N)? N b) Summary of enforcement actions:_____ c) Are operating and permit fees payments up-to-date (Y/N)? Y If not explain:_____ Additional Information: d) Does the facility monitor groundwater (Y/N)?: N If so, is it detection monitoring or assessment monitoring?: N/A e) What is the groundwater analytical sampling frequency? N/A months f) Does the facility collect landfill gas (Y/N)?: N g) Does the facility have a Gas Monitoring Plan (Y/N)? N h) Does the facility have gas monitoring probes (Y/N)? N i) Does the facility use an alternate daily cover (ADC)(Y/N)? N If so, what type of ADC is used: N/A If so, list document id# approving ADC: N/A j) Does the facility have a Liquid Waste Management (LWM) Plan (Y/N)? N If so, list document id# approving the LWM Plan: N/A k) Date and document id # of currently approved Operating Plan and Narrative: Date: 11-14-2001 & 8-12-2011 Doc#: *15646 & 62019* l) Date and document id # for currently approved Closure/ Post Closure Plan: Date: May 2007 Doc#: 48114	

			m) Date and document id # of currently approved Permit Drawings: Date: June 24, 2014 Doc#: *65347* *The facility submitted a revised final grading plan in October 2012 (Doc # 63258. The ADEQ approved the revised plans on June 24, 2014 (Doc # 65446).* n) Date and document id # of currently approved Design Narrative: Date: N/A Doc#: *N/A* o) Are weigh scales utilized at the landfill (Y/N)? N p) Does the final cap include a synthetic liner (Y/N)? N q) Does the final cap include clay liner (Y/N)? Y r) Total current permitted landfill volume: roughly 100,000 cubic yards	
13	22.423(b) 22.522(a) 22.619(b)	Certification of AEIR Report: "I have inspected the landfill site and have prepared this report to reflect operational compliance with permit conditions, permit plans, specifications, narrative, and all applicable regulations"	a) Arkansas Licensed Engineer: Sign: _____ Date: 7/31/25 . b) License Number: 9199 c) ***Attach seal here:*** 7-31-25 STATE OF ARKANSAS REGISTERED PROFESSIONAL ENGINEER No. 9199 DAVID C. McCORMICK	

Attachment A
Photographic Log



1. Northwest corner of the Class 4 Landfill looking towards East towards the North slope.



2. Northwest corner of the Class 4 Landfill looking towards South towards the West slope.



3. Stormwater pond on the Southeast side of the landfill.

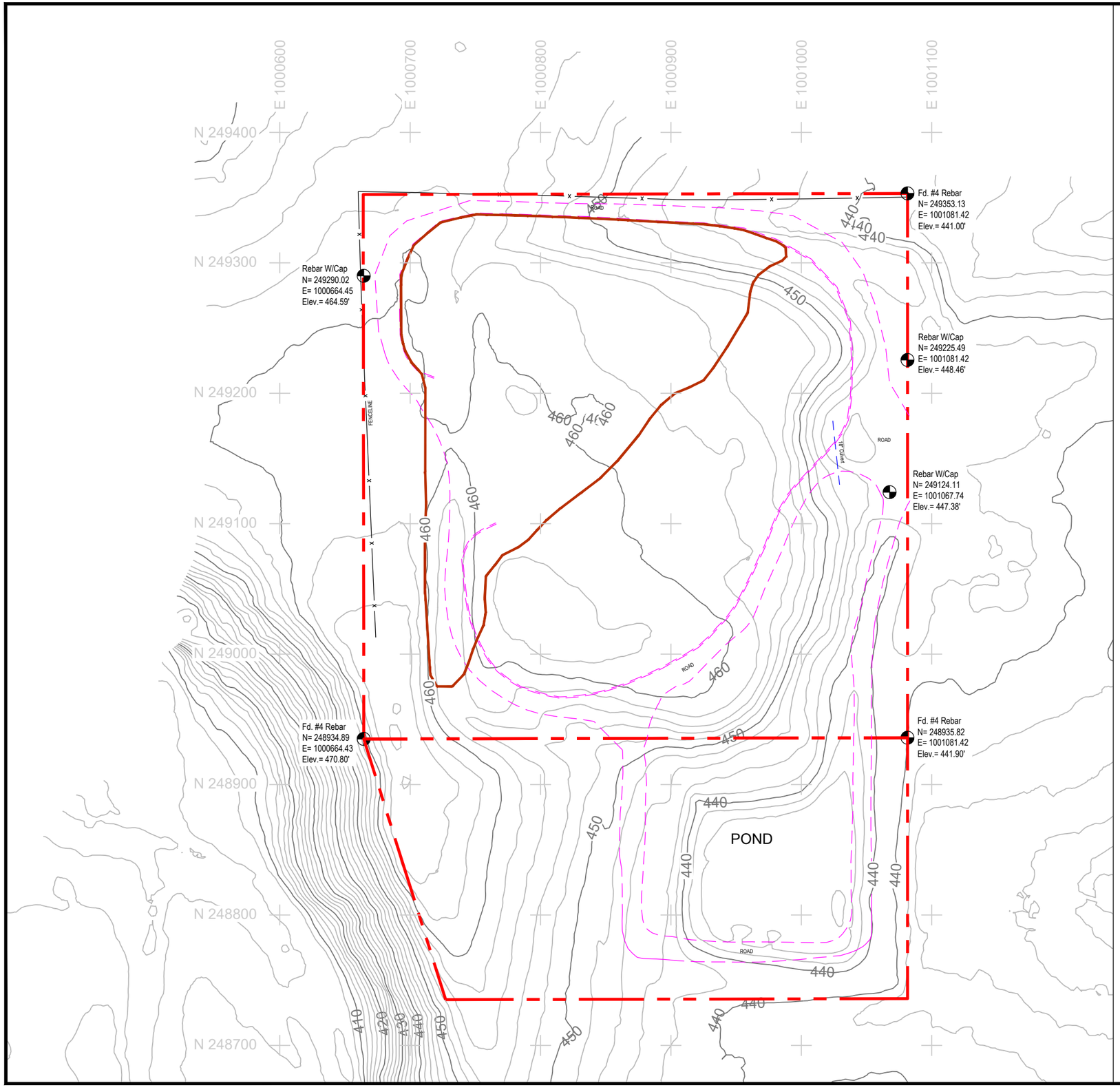


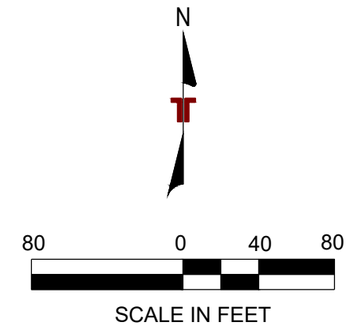
4. Stormwater pond approximately 18 inches below the discharge flume.



5. East side of the Class 4 Landfill looking West towards the East slope.

Attachment B
Updated Drawings





LEGEND

- PROPERTY BOUNDARY
- SITE BENCHMARK
- 100 — EXISTING CONTOURS
- INTERIM COVER

NOTE:
EXISTING CONTOURS SHOWN ON THIS DRAWING REPRESENT TOPOGRAPHIC SURVEY INFORMATION OBTAINED BY TERRACON CONSULTANTS ON OCTOBER 4, 2024.

FIGURE 1

DESIGNED BY:	TLB
DRAWN BY:	AS/TLB
APPVD. BY:	DCM
SCALE:	SEE BARSCALE
DATE:	7/23/2025
JOB NO.	068-001.362271/3
ACAD NO.	001
SHEET NO.:	1 OF 2

EXISTING TOPOGRAPHIC SURVEY

2024 ANNUAL ENGINEERING INSPECTION REPORT

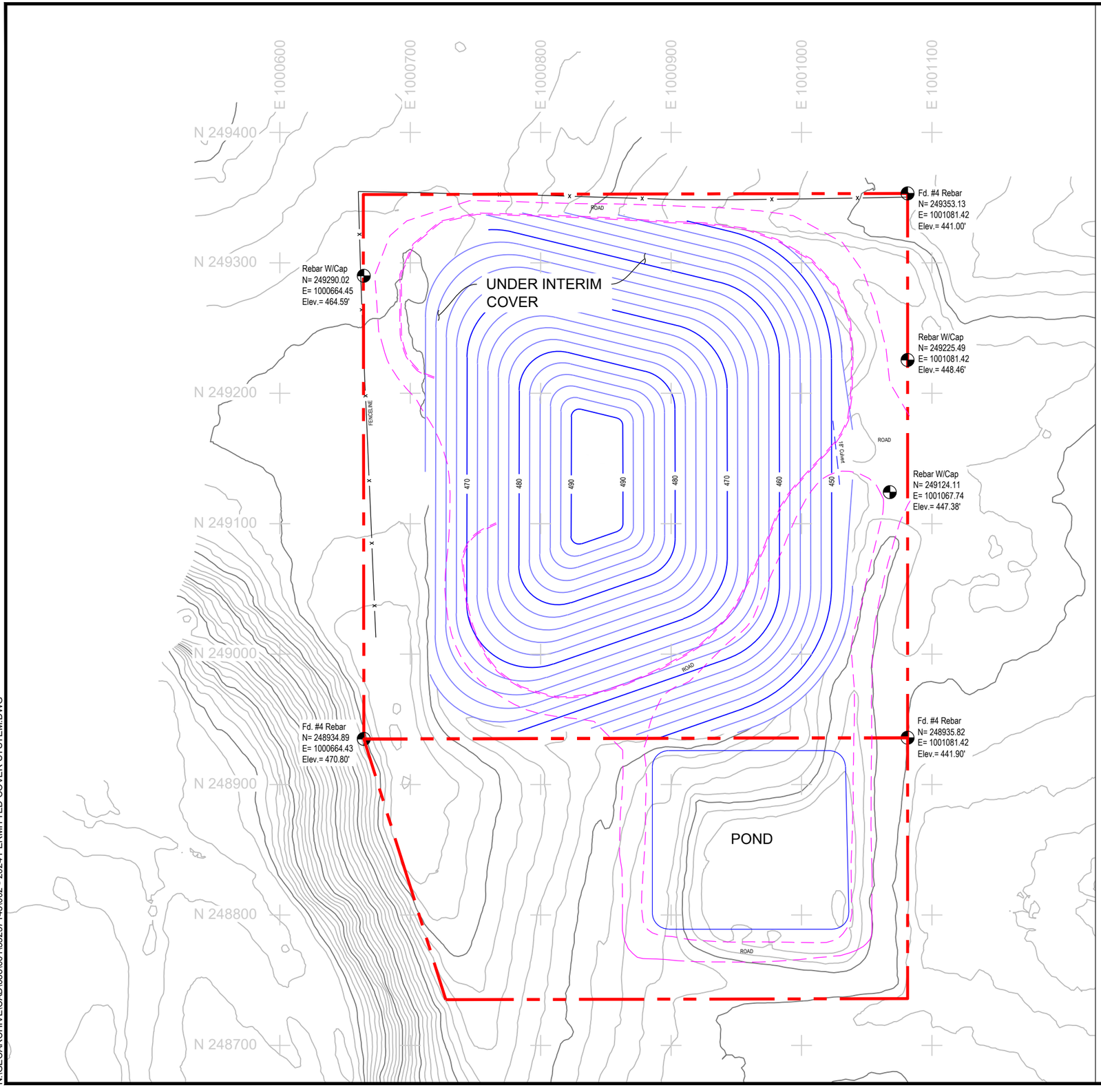
PERRY COUNTY

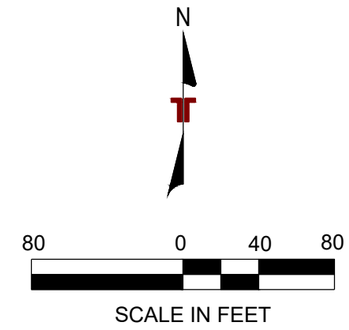
PERRY COUNTY CLASS 4 LANDFILL

CASA ARKANSAS

terracon
Consulting Engineers and Scientists
25809 INTERSTATE 30 S
BRYANT, ARKANSAS 72022
PH. (501) 847-9292
FAX. (501) 847-9210

REV.	DATE	BY	DESCRIPTION





LEGEND

- PROPERTY BOUNDARY
- SITE BENCHMARK
- 100 EXISTING CONTOURS
- 100 PERMITTED FINAL WASTE CONTOURS

NOTE:
EXISTING CONTOURS SHOWN ON THIS DRAWING REPRESENT TOPOGRAPHIC SURVEY INFORMATION OBTAINED BY TERRACON CONSULTANTS ON OCTOBER 4, 2025.

FIGURE 2

DESIGNED BY:	TLB
DRAWN BY:	AS/TLB
APPV'D. BY:	DCM
SCALE:	1" = 80'
DATE:	7/23/2025
JOB NO.	088-001-35247173
ACAD NO.	002
SHEET NO.:	2 OF 2

PERMITTED FINAL WASTE GRADES
2024 ANNUAL ENGINEERING INSPECTION REPORT
PERRY COUNTY
PERRY COUNTY CLASS 4 LANDFILL
CASA ARKANSAS

Terracon
Consulting Engineers and Scientists
25809 INTERSTATE 30 S BRYANT, ARKANSAS 72022
PH. (501) 847-9292 FAX. (501) 847-9210

REV.	DATE	BY	DESCRIPTION

N:\GECARCHIVE\CAD\088\001\352571143\002 - 2024 PERMITTED COVER SYSTEM.DWG

Attachment C

Leachate Analytical Report – Not Applicable

Attachment D

Updated Financial Assurance

CLOSURE COST ESTIMATE 2024
Perry County Class 4 Solid Waste Landfill
Worse Case Scenario - Largest Waste Cell

ITEM	QUANTITY	UNIT	UNIT PRICE	AMOUNT
Surface Preparation	3.4	AC	$1,500	$5,100
Clay Cover (1.5-foot thick)	8,228	CY	$3.75	$30,855
Vegetation/Soil Top Layer (min. 6-inches thick)	2,745	CY	$4.25	$11,666
Seeding/Fertilizing/Mulching	3.4	AC	$2,500	$8,500
Erosion Control	1	LS	$2,500	$2,500
Quality Assurance/Quality Control [3]	1	LS	$15,000	$15,000
Surveying	1	LS	$2,500	$2,500
Certification	1	LS	$3,500	$3,500
TOTAL				**$79,621**

Notes:

1. Costs are Terracon engineering estimates in 2023 dollars. Estimates are based on prior contractor bids and construction costs for construction projects, sampling, and maintenance work on similar sites in the state of Arkansas.
2. The cost estimates are based on the design and closure plan provided in the Permit Modification Application.
3. Includes CQA monitoring and CQA laboratory testing.

Year	2024	2025	2026	2027	2028
Inplicit Price Deflator*	**1.027**				
Adjusted Closure Cost Estimate	**$81,771**				

** Source: https://www.adeq.state.ar.us/sw/permits/financial.aspx*

Note:

1. Inflation Factors provided by Arkansas Division of Environmental Quality (ADEQ) via, http://www.adeq.state.ar.us/sw/permits/financial.aspx#collapseAeir. Terracon has performed a cursory check on the calculation of the inflation factors using the United States implicit price deflators (IPD) stated in the Table and the inflation factor calculation methodology as provided by ADEQ on this website. Terracon has determined that for the year 2021, the inflation factor provided is a multiplier. Terracon has not independently verified the accuracy of the IPD data or the cost adjustment application methodology provided by ADEQ on this website. Therefore, Terracon is not responsible for cost adjustment errors resulting from any errors, flaws, or omissions in the inflation factor calculations or cost adjustment methodology provided by ADEQ at this website.
2. See Note 1. Costs for 2021 are increased by applying the Inflation Factor (IF) as a multiplier. Current Year Cost = Prior Year Cost * IF

POST-CLOSURE CARE COST ESTIMATE 2024
Perry County
Class 4 Solid Waste Landfill

TABLE A ANNUAL MISC. REPAIRS (SUBSIDENCE, SETTLING, EROSION, ROADS, ETC.)				
ITEM	**QUANTITY**	**UNIT**	**UNIT PRICE**	**AMOUNT**
Labor (3 people x 8 hr/day x 5 days/yr)	120	Hours	$32.00	$3,840
Equipment- Dozer	30	Hours	$130	$3,900
Dump Truck	30	Hours	$85	$2,550
Loader	30	Hours	$90.00	$2,700
Misc. Materials and Services [1]	2	LS	$1,600	$3,200
TOTAL ESTIMATED ANNUAL MISC. REPAIRS				**$16,190**

TOTAL ESTIMATED POST-CLOSURE CARE COSTS (2-YEAR PERIOD [2]):	**$32,380**

Notes:

N/A = Not Applicable

1 - Facility design does not include Groundwater Monitoring Systems or Gas Monitoring System.

2 - Post-Closure Care period is two years.

3 - Costs are Terracon engineering estimates in 2023 dollars. Estimates are based on prior contractor bids and construction costs for construction projects, sampling, and maintenance work on similar sites in the state of Arkansas.

POST-CLOSURE COST INFLATION ADJUSTMENT

Year	2024	2025	2026	2027	2028
Inplicit Price Deflator	**1.027**				
Adjusted Closure Cost Estimate	**$33,254**				

** Source: https://www.adeq.state.ar.us/sw/permits/financial.aspx*

Note:

1. Inflation Factors provided by Arkansas Division of Environmental Quality (ADEQ) via, http://www.adeq.state.ar.us/sw/permits/financial.aspx#collapseAeir. Terracon has performed a cursory check on the calculation of the inflation factors using the United States implicit price deflators (IPD) stated in the Table and the inflation factor calculation methodology as provided by ADEQ on this website. Terracon has determined that for the year 2021, the inflation factor provided is a multiplier. Terracon has not independently verified the accuracy of the IPD data or the cost adjustment application methodology provided by ADEQ on this website. Therefore, Terracon is not responsible for cost adjustment errors resulting from any errors, flaws, or omissions in the inflation factor calculations or cost adjustment methodology provided by ADEQ at this website.

2. See Note 1. Costs for 2021 are increased by applying the Inflation Factor (IF) as a multiplier. Current Year Cost = Prior Year Cost * IF