November 05, 2024

The Honorable Darryl Mahoney, Garland County Judge (DMahoney@garlandcounty.org)
Garland County Class 4 Landfill
PO Box 638 Hot Springs, AR 71902

Re: Second Notice of Deficiency- Minor Permit Modification Application
Garland County Class 4 Landfill
Permit No: 0300-S4; AFIN: 26-00405
Reference Document ID: 85232, 85661, 0300-S4_Overfill Management Plan_20240911

Dear Judge Mahoney:

The Division of Environmental Quality Office of Land Resources (DEQ) has received the revised Minor Permit Modification Application for the Garland County Class 4 Landfill (Document ID 85232). After review, DEQ has the following comments:

1. In the second paragraph within the Revised Permit Drawing section, the narrative appears to indicate that the 12-inch protective layer over the geosynthetic clay liner (GCL) is included as part of the separation distance from bedrock. DEQ considers the GCL the top of the liner system, not the 12-inch protective layer. As such, the bedrock separation distance must be maintained from the top of the GCL. Please revise the narrative in this section to reflect two feet of separation between bedrock and the elevation of the GCL.

2. For both the GCL and compacted clay liner (CCL) options please revise Permit Drawing P-8B, Liner and Final Cover Details – Supplemental, to clearly depict the minimum thickness of subgrade material and the liner component(s) thickness that is necessary to maintain two (2) feet of separation from bedrock and the top of the liner system.

3. Due to the extremely low hydraulic conductivity of the proposed GCL option, there is concern about leachate and/or stormwater retention within the landfill. Given the east to west drainage profile of the site, the location of the future cells that could receive the proposed liner (East side of the site), and the past issues with seepage along the western edge, DEQ requests that the need for leachate management systems be evaluated and presented in the permit modification application.

4. In the 2023 Annual Engineering Inspection Report (AEIR), submitted June 28, 2024, under Document ID 85661, multiple overfills were noted. DEQ requests that the Overfill Management Plan (OMP) submitted October 17, 2024, under Document ID 0300-S4_Revised Overfill Management Plan_20241017 be modified as follows:

    a. Regrading of the overfills in phase one may be postponed until 2025 so that the established vegetation may be allowed to remain for the winter/rainy season. The regrading activities should be completed by August 01, 2025.

Please address the deficiencies identified above and submit an updated permit modification application to DEQ within thirty (30) calendar days from the receipt of this letter.

Should you have any questions or need additional information, please contact me at (501)-682-0706 or david.isaacs@arkansas.gov.

Thank you,



David Isaacs
Engineer, Division of Environmental Quality
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cc: DEQ – Hurt, Jones, Banic, Pearson, Sadler
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