Haley Griffith (adpce.ad)

Subject: RE: DEQ - Garland County Class 4 Overfill (OFMP Response and Partial Closure CQA Certification)

From: Carpenter, Owen <Owen.Carpenter@terracon.com>
Sent: Wednesday, August 5, 2026 1:27 PM
To: David Isaacs <david.isaacs@arkansas.gov>
Cc: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>; Greg Banic (adpce.ad) <Greg.Banic@arkansas.gov>; Judge, GarlandCo <dmahoney@garlandcounty.org>; Billy Sawyer <bsawyer@garlandcounty.org>; John Rogers <john.rogers@craftontull.com>; Potter, Drew <Drew.Potter@terracon.com>
Subject: RE: DEQ - Garland County Class 4 Overfill (OFMP Response and Partial Closure CQA Certification)

CAUTION: External Email

Good afternoon Mr. Isaacs!

Please see the attached Overfill Removal Completion Notice for the North Overfill at Garland County and the CQA Certification Report for the Partial Closure of the lower western side of Phases 1 and 2. These recent activities removed the overfill noted in previous correspondence and addressed in the Overfill Management Plan. ASTM standards used in the closure certification work are as noted in the "**2024 Phase 3, Cell 1 CQA Certification Revised Report NOD Response**" dated 12/24/2025. If you have any questions or need any additional information, please do not hesitate to contact John Rogers with Crafton Tull or Drew Potter or me at your earliest convenience.

Thanks!
Owen

F. Owen Carpenter, P.E., P.G.
Terracon
D (501) 943 1020 I C (501) 622 0887
owen.carpenter@terracon.com

From: David Isaacs <David.Isaacs@arkansas.gov>
Sent: Thursday, July 9, 2026 3:46 PM
To: Carpenter, Owen <Owen.Carpenter@terracon.com>
Cc: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>; Greg Banic (adpce.ad) <Greg.Banic@arkansas.gov>
Subject: DEQ - Garland County Class 4 Overfill

Good afternoon,

After taking a quick look at the Garland County Class 4 2026 AEIR we noticed that it indicated the overfills were no longer present. I do not see where the reports required by the overfill management plan approval (**0300-S4_Approval-DEQ-Approval of Overfill Management Plan_20250303**) were submitted. Could you provide an update on their status?

Thanks –

David Isaacs
Engineer
E&E | Environmental Quality | Land Resources
e: david.isaacs@arkansas.gov
t: 501-682-0706

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3512 S Shackleford Rd
Little Rock, AR 72205
P (501) 221-7122
F (501) 221-7775
Terracon.com

August 5, 2026

Arkansas Department of Energy & Environment
Division of Environmental Quality, Office of Land Resources
Solid Waste Management
5301 Northshore Drive
North Little Rock, AR 72118-5317

Attention: Mr. David Isaacs, Solid Waste Permitting Engineer
P: (501) 682-0706
E: david.isaacs@arkansas.gov

Subject: Overfill Removal Completion Notice – North Overfill
Garland County Cedar Glades Class 4 Landfill
Permit No: 0300-S4 AFIN: 26-00405
Terracon Project No. 35247264

Dear Mr. Isaacs:

The Garland County Class 4 Landfill removed soil overfill that was discovered during review of Engineering Inspection Reports for the facility during 2024. An Overfill Corrective Action Plan was submitted and subsequently approved. The Landfill finished correcting the overfill condition during 2025. McHenry and Meyer (cell and partial closure contractor) removed the overfill along the north slope of Phase 2, Cell 4 (North Overfill) in a couple of iterations with verification surveys. Additionally, McHenry and Meyer performed construction for the partial closure of the west side of Phases 1 and 2. Corrective actions performed and verification data for the North Overfill removal are presented below.

Corrective Action

The following procedures were performed to remediate the overfill areas:

- The facility removed the soil overfill in the north area and placed approximately one foot of interim soil cover over in-place waste to establish appropriate grades.

- The facility completed construction of the West Area Partial Closure. A final as-built survey on the top of the finished erosion layer was transmitted by Crafton Tull on February 26, 2026.

- Verification topographic surveys were conducted of the overfill areas. A final grid survey of the North Overfill area was captured on January 6, 2026 upon completion of

the remediation of the north area and survey data were transmitted by Crafton Tull on January 7, 2026. Attached Figures 1 and 2 illustrate the overfill removal and topographic survey grid points. Photographs of the finished overfill removal area taken January 6, 2026 are attached at the end of this report.

- Overfill removal and establishment of subgrade in the west partial closure area was completed during September through December 9, 2025, including in the previously used access road area. This prepared surface included grading of the closure area prior to the installation of the compacted low permeability soil barrier layer. Soils and wastes were removed to permitted final waste grades in the previously identified overfill areas. Verification topographic surveys were provided on 9.8.2025 for the southern portion of the closure area and 12.9.2025 for the northern portion of the closure area, including in the previous access road area. A certification report that includes subgrade survey information and illustrations of the compacted soil barrier layer and erosion layer is forthcoming. The closure area was observed on July 1, 2026 and grass was adequately established at the time to certify the closure as completed.

In summary, as indicated in the attached figures, the North Overfill was remediated to remove any overfilled waste and soil and to reestablish interim cover grades near the permitted final waste grades surface. One mounded area that was slightly above final waste grades (see survey point 1040) was subsequently re-graded by the contractor to final waste grades. No waste is present in the area at elevations above the permitted final waste grades surface. The facility has also purchased equipment GPS and will control slope elevations using grade control to stay below permitted final waste grades going forward.

Thank you for your consideration of the above items. If you have any questions, please feel free to contact John Rogers of Crafton Tull or either of the undersigned at (501) 221-7122.

Sincerely,
Terracon Consultants, Inc.

F. Owen, Carpenter, P.E., P.G.
Senior Engineer

Dave C. McCormick, P.E.
Department Manager/APR

Attachments: Figure 1 –Overfill Removal Verification
Figure 2 - Cross Sectional Sheet with Final Cover Shown
Photographs of finished remediation in north slope area

Cc: Judge Darryl Mahoney/Billy Sawyer (Garland County)
John Rogers (Crafton Tull)



N

SCALE: 1" = 30'

NOTES:

1. AREAS IN ORANGE ARE TYPICALLY PERIMETER SHOTS **ABOVE** FWG.
2. AREAS IN BROWN ARE LESS THAN 0.5' **ABOVE** FWG.
3. AREAS IN GREEN ARE 0' AND 1' **BELOW** FWG.
4. AREAS IN CYAN ARE BETWEEN 1' AND 10' **BELOW** FWG.
5. AREAS IN BLUE ARE BETWEEN 10' AND 31.96' **BELOW** FWG.

* POINTS 1001 THROUGH 1009 AND 1019 LIE ON THE CELL EDGE PERIMETER WITHIN THE PERIMETER CLAY TIE-IN BENCH. POINT 1040 INDICATED WASTE PLUS INTERIM COVER APPROXIMATELY 0.5 FT. ABOVE THE PERMITTED FINAL WASTE GRADES. THIS AREA WAS SUBSEQUENTLY GRADED DOWN BY THE CONTRACTOR.

IN AREAS THAT INTERSECT THE PERIMETER COVER TIE-IN BENCH, THE WASTE PLUS INTERIM COVER PLANE THAT IS DESCENDING DOWN THE SLOPE WILL BE TERMINATED INTO THE TOP OF THE CLAY SOILS OF THE BENCH RATHER THAN BEING EXTENDED DOWN TO ELEVATIONS BELOW THE TOP OF THE PERIMETER BENCH. THE FINAL COVER TWO-FEET THICK SOIL CAP WILL THEN TIE INTO THE TOP OF THE PERIMETER TIE-IN BENCH.

POINT#	NORTHING	EASTING	PERMITTED FWG	EXISTING TOPO (1.6.26)	DIFFERENCE	OVERFILL CORRECTION
1001	1993395.773	984606.502	514.992	515.838	-0.85	PERIMETER*
1002	1993417.792	984639.896	515.555	516.193	-0.64	PERIMETER*
1003	1993439.811	984673.291	516.089	517.073	-0.98	PERIMETER*
1004	1993461.830	984706.685	516.703	517.568	-0.86	PERIMETER*
1005	1993483.849	984740.079	517.275	517.922	-0.65	PERIMETER*
1006	1993505.868	984773.473	517.846	518.339	-0.49	PERIMETER*
1007	1993527.887	984806.867	518.417	518.782	-0.36	PERIMETER*
1008	1993548.564	984841.147	517.771	518.339	-0.57	PERIMETER*
1009	1993559.833	984881.628	517.846	518.751	-0.91	PERIMETER*
1010	1993362.379	984628.521	525.049	524.756	0.29	✓
1011	1993384.398	984661.915	525.601	525.416	0.19	✓
1012	1993406.417	984695.310	526.080	525.884	0.20	✓
1013	1993428.436	984728.704	526.757	526.593	0.16	✓
1014	1993450.455	984762.098	527.328	527.192	0.14	✓
1015	1993472.474	984795.492	527.900	527.850	0.05	✓
1016	1993494.493	984828.886	527.971	527.925	0.05	✓
1017	1993516.512	984862.280	526.646	526.734	-0.09	✓
1018	1993538.531	984895.674	522.676	522.578	0.10	✓
1019	1993558.210	984929.068	518.185	519.191	-1.01	PERIMETER*
1020	1993328.985	984650.540	535.106	534.877	0.23	✓
1021	1993351.004	984683.935	535.595	535.302	0.29	✓
1022	1993373.023	984717.329	536.071	535.892	0.18	✓
1023	1993395.042	984750.723	536.811	536.660	0.15	✓
1024	1993417.061	984784.117	537.382	537.237	0.14	✓
1025	1993439.080	984817.511	537.953	537.841	0.11	✓
1026	1993461.099	984850.905	537.217	537.213	0.00	✓
1027	1993483.118	984884.299	534.391	534.311	0.08	✓
1028	1993505.137	984917.693	529.898	530.034	-0.14	✓
1029	1993527.156	984951.087	523.372	523.283	0.09	✓
1030	1993542.957	984975.051	518.363	518.573	-0.21	✓
1031	1993295.591	984672.599	545.163	545.005	0.16	✓
1032	1993317.610	984705.954	545.499	545.367	0.13	✓
1033	1993339.629	984739.348	546.063	546.029	0.03	✓
1034	1993361.648	984772.742	546.865	546.783	0.08	✓
1035	1993383.653	984806.136	547.439	547.378	0.06	✓
1036	1993405.672	984839.530	547.792	547.773	0.02	✓
1037	1993427.691	984872.924	546.109	546.160	-0.05	✓
1038	1993449.710	984906.318	541.966	541.826	0.14	✓
1039	1993471.743	984939.712	535.572	535.535	0.04	✓
1040	1993493.762	984973.106	527.960	528.471	-0.51	OF *
1041	1993515.781	985006.500	519.129	518.394	0.73	✓
1042	1993262.197	984694.578	555.220	552.775	2.44	✓
1043	1993284.216	984727.973	555.483	555.380	0.10	✓
1044	1993306.235	984761.367	556.054	556.141	-0.09	✓
1045	1993328.254	984794.761	556.918	556.830	0.09	✓
1046	1993350.273	984828.155	557.490	557.521	-0.03	✓
1047	1993372.292	984861.549	557.036	557.001	0.03	✓
1048	1993394.311	984894.943	553.678	553.636	0.04	✓
1049	1993416.330	984928.337	547.772	547.787	-0.02	✓
1050	1993438.349	984961.731	540.050	539.794	0.26	✓
1051	1993460.368	984995.125	531.219	529.393	1.83	✓
1052	1993482.387	985028.519	521.343	518.993	2.35	✓
1053	1993373.754	984573.108	514.420	513.050	1.37	✓
1054	1993340.360	984595.127	524.477	523.084	1.39	✓
1055	1993306.966	984617.146	534.534	531.546	2.99	✓
1056	1993273.572	984639.165	544.591	540.787	3.80	✓
1057	1993240.178	984661.184	554.586	549.011	5.58	✓
1058	1993206.783	984683.203	563.215	555.799	7.42	✓
1059	1993228.802	984716.598	565.277	560.229	5.05	✓
1060	1993250.821	984749.992	565.475	565.418	0.06	✓
1061	1993272.841	984783.386	566.045	566.002	0.04	✓
1062	1993294.860	984816.780	566.972	566.894	0.08	✓
1063	1993316.879	984850.174	567.543	567.552	-0.01	✓
1064	1993338.898	984883.568	565.395	563.373	2.02	✓
1065	1993360.917	984916.962	559.973	555.511	4.46	✓
1066	1993382.936	984950.356	552.141	547.992	4.15	✓
1067	1993404.955	984983.750	542.967	539.061	3.91	✓
1068	1993426.974	985017.144	533.014	528.357	4.66	✓
1069	1993448.993	985050.538	523.060	518.885	4.17	✓
1070	1993173.389	984705.222	571.093	563.698	7.40	✓
1071	1993195.408	984738.617	575.334	568.342	6.99	✓
1072	1993217.427	984772.011	575.512	573.820	1.69	✓
1073	1993239.446	984805.405	576.036	576.017	0.02	✓
1074	1993261.465	984838.799	577.026	575.079	1.95	✓
1075	1993283.485	984872.193	576.854	568.366	8.49	✓
1076	1993305.504	984905.587	572.173	560.820	11.35	✓
1077	1993327.523	984938.981	564.232	552.585	11.65	✓
1078	1993349.542	984972.375	554.638	545.185	9.45	✓
1079	1993371.561	985005.769	544.684	535.751	8.93	✓
1080	1993393.580	985039.163	534.730	523.918	10.81	✓

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PHASE 1 & 2 PARTIAL CLOSURE

1040 CEDAR GLADES ROAD
HOT SPRINGS, ARKANSAS

Key Plan

NORTH OVERFILL FWG VERIFICATION

No.	Description	Date

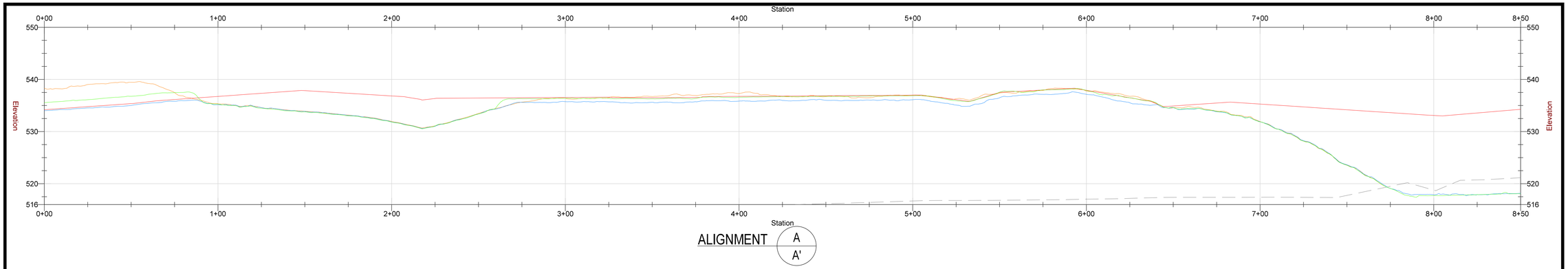
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PROJECT NO: 35237123
ISSUE DATE: JANUARY 2026
CONTACT: J. ROGERS
QC by:
QC Date:

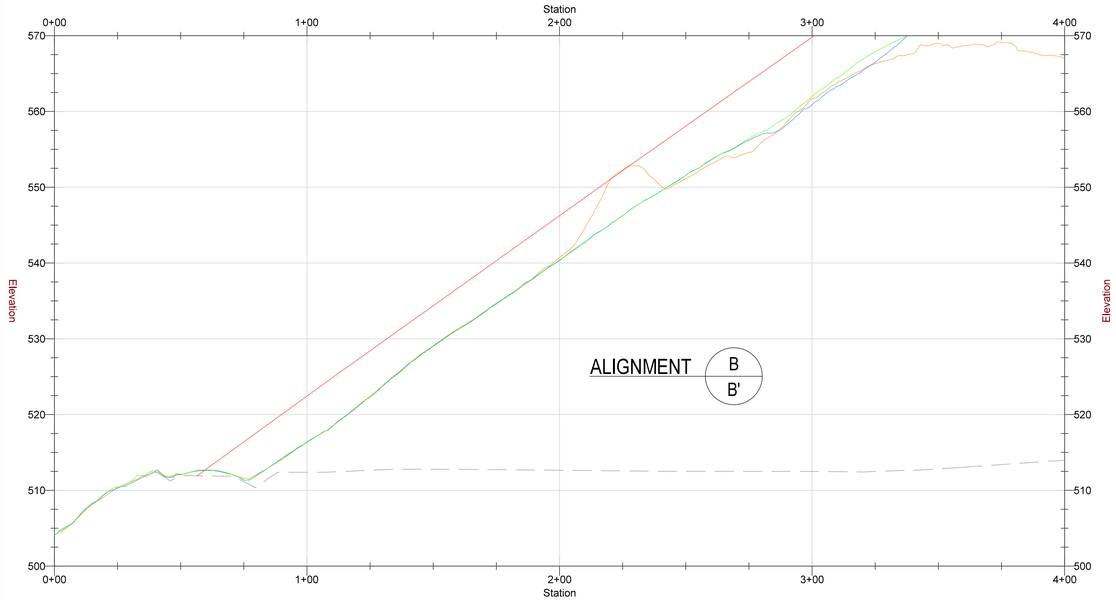
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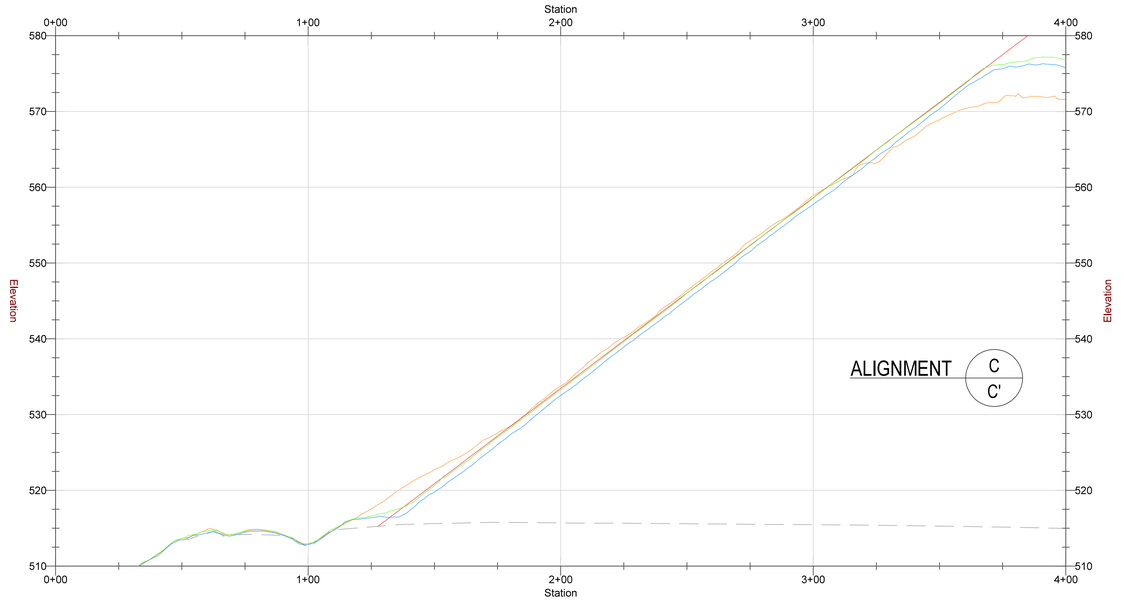
DRAWING 1



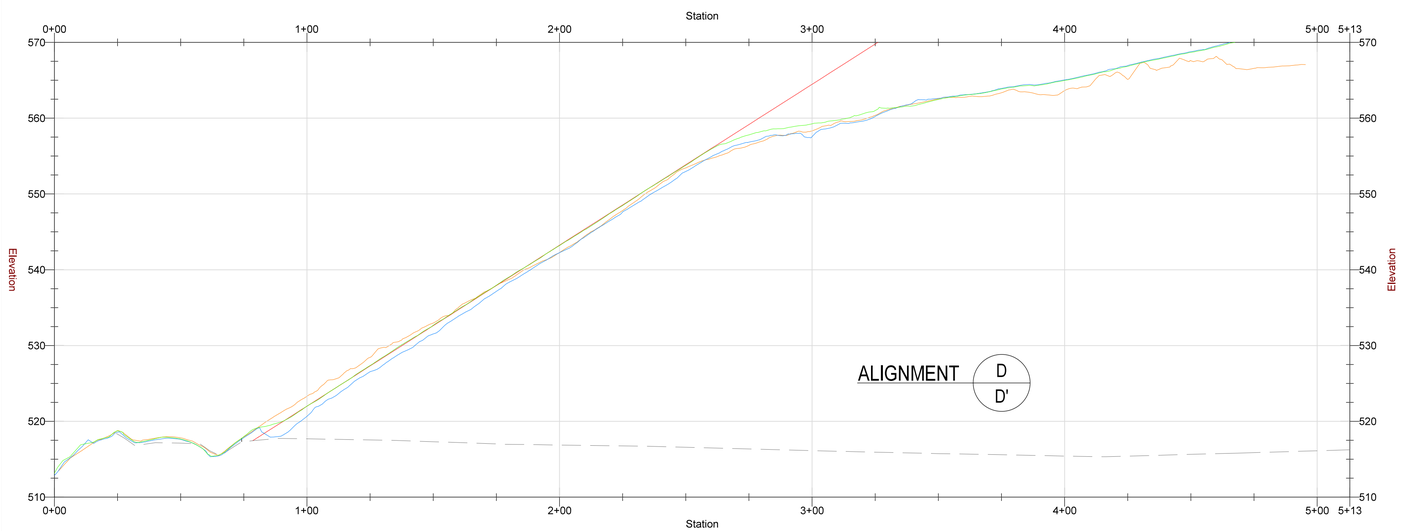
ALIGNMENT A / A'



ALIGNMENT B / B'



ALIGNMENT C / C'



ALIGNMENT D / D'

SCALE:
1" = 30' (HORIZONTAL)
1" = 10' (VERTICAL)
VERTICAL EXAGGERATION = x3

LEGEND:

- PERMITTED FINAL WASTE GRADES (FINAL COVER MINUS 2')
- AS-BUILT TOPO (9.8.2025)
- AS-BUILT TOPO (12.9.2025)
- AS-BUILT TOPO (1.6.2026)
- PHASE 2, CELLS 3 & 4 - AS-BUILT BOTTOM LINER

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PHASE 1 & 2 PARTIAL CLOSURE

1040 CEDAR GLADES ROAD
HOT SPRINGS, ARKANSAS

Key Plan

NORTH OVERFILL FWG VERIFICATION

No.	Description	Date

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PROJECT NO: 35247264
ISSUE DATE: DECEMBER 2025
CONTACT: J. ROGERS
QC by:
QC Date:

CERTIFICATE OF AUTHORIZATION
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ARKANSAS

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DRAWING 2



Looking southeast at North Overfill removal area



Looking south at North Overfill removal area



Looking southwest at North Overfill removal area
Partial Closure area in background right



Looking south-southwest toward north edge of Partial Closure area



Looking northwest from north edge of Partial Closure area