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Bryant, AR 72022-9313
P 501-847-9292
F 501-847-9210
Terracon.com

August 30, 2024

Mr. David Isaacs, Solid Waste Permitting Engineer
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

RE: Overfill Management Plan
Garland County Cedar Glades Class 4 Landfill
Permit# 0300-S4; AFIN 26-00405
Terracon Project No. 35247209

Dear Mr. Isaacs:

On behalf of the Garland County Cedar Glades Class 4 Landfill (GCCG LF) and Crafton Tull (site engineer), Terracon Consultants, Inc. (Terracon) is providing this Overfill Management Plan (OFMP) to identify the makeup of the overfill conditions at the GCCG LF and to remove excess materials where indicated. Some areas in question may likely consist of only weekly cover, intermediate cover, buttress and/or repair soils. Therefore, this Plan will discuss the methods to be utilized in determining the constituents of the overfill areas along the north and west slopes. Excess fill that includes disposed waste will be removed and graded to appropriate elevations by the facility within 30 days of the DEQ approval of this OFMP.

Background

Terracon provided the 2023 AEIR to DEQ Solid Waste personnel on June 28, 2024 (Doc ID 85661). During review, the DEQ noted that the submitted isopach contour map and cross sections provided in the AEIR indicated excess soil fill. It was confirmed during a recent site visit that areas of excess soil, potentially with waste overfill, are in place in recently filled areas along the north slope of the newest constructed cell – Phase 2, Cell 4. Excess soil is also in place along the western slope of the landfill, including in the vicinity of the temporary access road to the active fill area.

This Plan contains measures to verify whether fill areas that are above final waste grades contain only soil and to remove filled materials that contain waste above the final waste grades (two feet below permitted final cover grades) along the northern perimeter of Phase 2, Cell 4 and along the west interim closed slopes of Phases 1 and 2.

As shown on the enclosed drawing, the lateral extent of areas above final waste grades involve approximately 118,000 sq. ft. of area on the northern and western sides of the active landfill.

Areas with fill above the final waste grades have generally had soil added as a preventative measure within wet areas to prevent leachate seep outbreaks. Temporary soil fill associated with the disposal area access road is noted in the vicinity of the cross section alignment B-B'. Along the northern slope of newest cell Phase 2, Cell 4, a soil buttress was left in place to prevent interface flow from eminating from the lower part of the slope. The attached photograph, taken on August 29th, indicates several feet of soil within the buttress at the north end of the active landfill.

Test Pit Potholing Evaluation

An initial evaluation of the indicated excess soil areas will include test pit potholing to determine if wastes are present above the permitted final waste grades. Prior to excavation of the test pits, Crafton Tull will provide survey stakes at each of the proposed test pit locations. The approximate grade staking locations will be placed approximately as shown in the attached drawing and presented in the attached staking points list. The owner will utilize an excavator or backhoe to dig test pits at the locations indicated on the attached drawing, starting at the point that requires the most cut in each of the four larger overfill areal extents. This is expected to occur at points 7, 13, 18 and 21. If waste is found above the cut depth and final waste grades indicated on the stakes, additional potholing at staking locations will be done to determine the extent of waste overfill. The test pits will be excavated on an approximate 50-foot grid across the aforementioned overfill areas and will terminate when waste is no longer encountered. The third party surveyor will survey top of waste in each test pit to determine the extent and volume of waste that is over permitted grades, if any. Photographs of the test pits showing tape-down measurements will be provided.

Removal and Re-grading of Waste Overfill

Waste overfill identified using the test pit potholing method will be removed and the area re-graded to keep the waste and cover at or below the final waste grades. For removal of wastes and soils that are currently present above the final waste grades, confirmatory survey shots will be taken to demonstrate the areas are now within the final waste grades. Soil only areas along the west slope will remain until the area is regraded and closed with a low permeability cover system. A partial closure of the west slope is anticipated soon and preliminary construction drawings have been prepared using the currently permitted cover system.

Reporting

Upon completion of the field activities and receipt of survey data, Terracon will prepare a letter report for submittal to Garland County and the DEQ presenting the findings of these field activities. The report will contain the following information:

- Test Pit Locations;
- Test Pit Logs and Photographs;
- Survey data; and
- Findings and Conclusions.

Upon DEQ review and approval of this OFMP, investigatory and excavation activities will begin. Test pits and any required waste overfill removal will be accomplished within 30 days. If the 30-day window needs to be extended for any reason, including incliment weather, the DEQ will be notified and an extension will be requested. Garland County, Crafton Tull and Terracon appreciate the cooperation of the DEQ with this matter. If you have any questions, please feel free to contact me at owen.carpenter@ terracon.com or at (501) 847-9292.

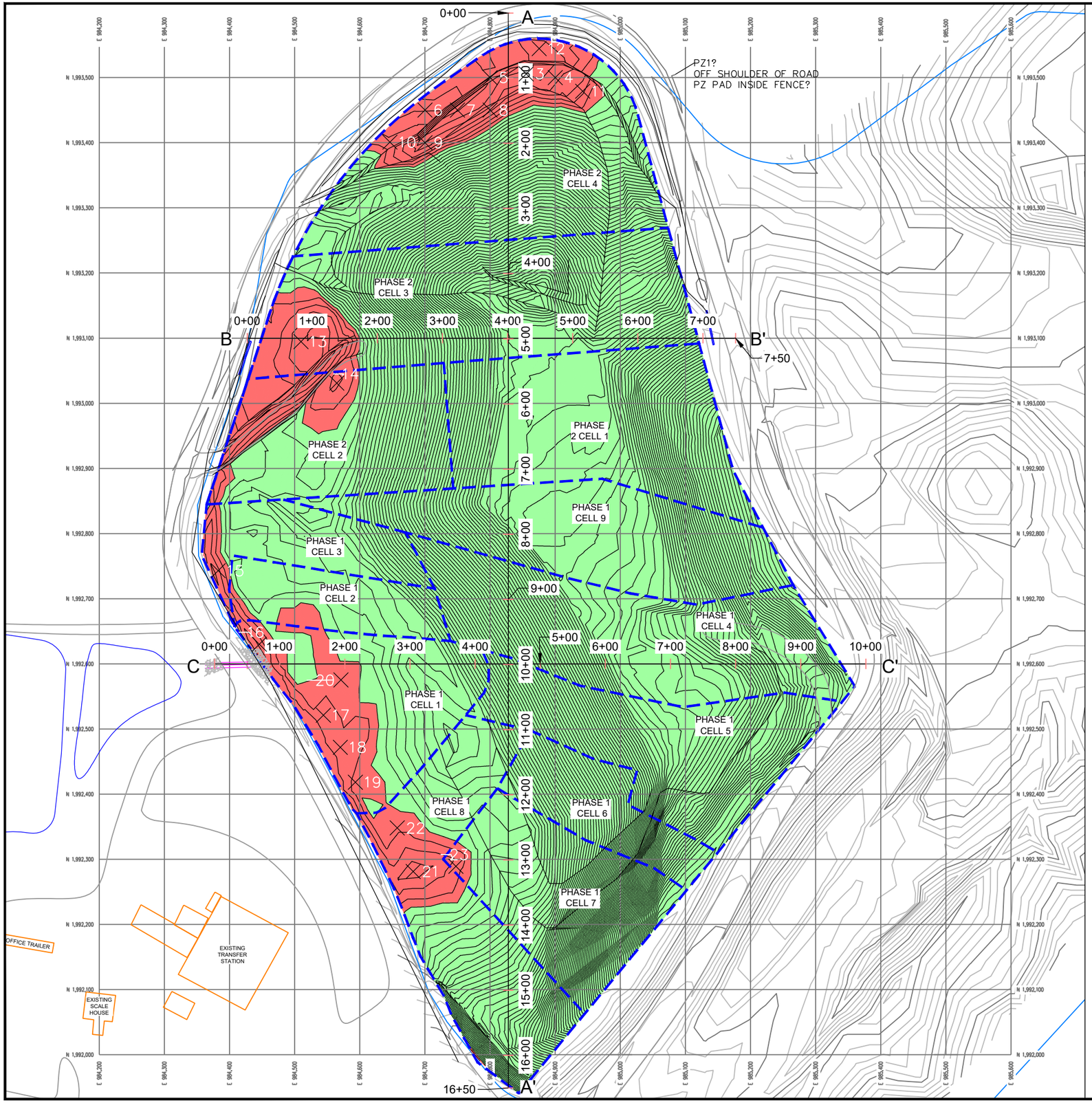
Sincerely,
Terracon Consultants, Inc.

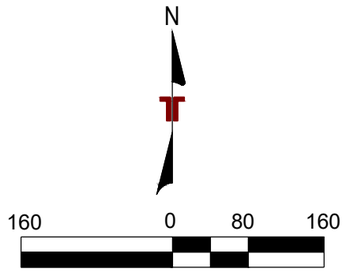
F. Owen Carpenter, P.E., P.G.
Senior Solid Waste Engineer

for David C. McCormick, P.E.
Manager/APR

Copy: Darryl Mahoney, Garland County Judge
John Rogers, Crafton Tull

Attachments: Drawing Sketch of Work Areas
Cross Sectional Sheet with Final Cover Shown
Table of Proposed Staking Locations 3-23 with Final Waste Grade Elevations
Photograph of Excavation in north slope area





SCALE: 1" = 160'

LEGEND

- LANDFILL BOUNDARY
- PHASE BOUNDARY
- 370 — EXISTING 2024 CONTOURS (2')
- 20 — ISOPACH CONTOURS (FROM EXISTING 2024 CONTOURS TO FINAL WASTE GRADES)
- AIRSPACE
- EXCESS SOIL FILL

NOTE:
EXISTING CONTOURS SHOWN ON THIS DRAWING REPRESENT AERIAL TOPOGRAPHIC SURVEY INFORMATION OBTAINED BY CRAFTON TULL ON JANUARY 3, 2024.

REV.	DATE	BY	DESCRIPTION

ISOPACH CONTOURS WITH GRADE STAKING POINTS

2023 ANNUAL ENGINEERING INSPECTION REPORT

B&F ENGINEERING, INC.

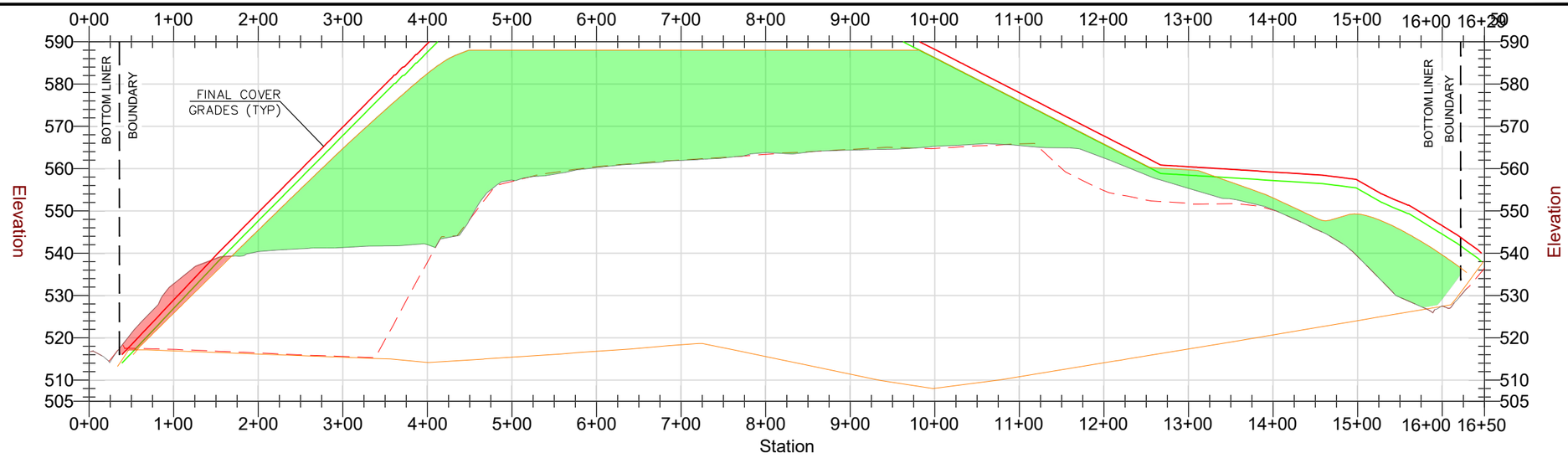
CEDAR GLADES CLASS 4 LANDFILL

GARLAND COUNTY ARKANSAS

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

FIGURE 3

DESIGNED BY:	DAP
DRAWN BY:	DAP
APPVD. BY:	FOC
SCALE:	SEE BARSCALE
DATE:	08/29/2024
JOB NO.	009-006-35247095
ACAD NO.	003
SHEET NO.:	3 OF 4



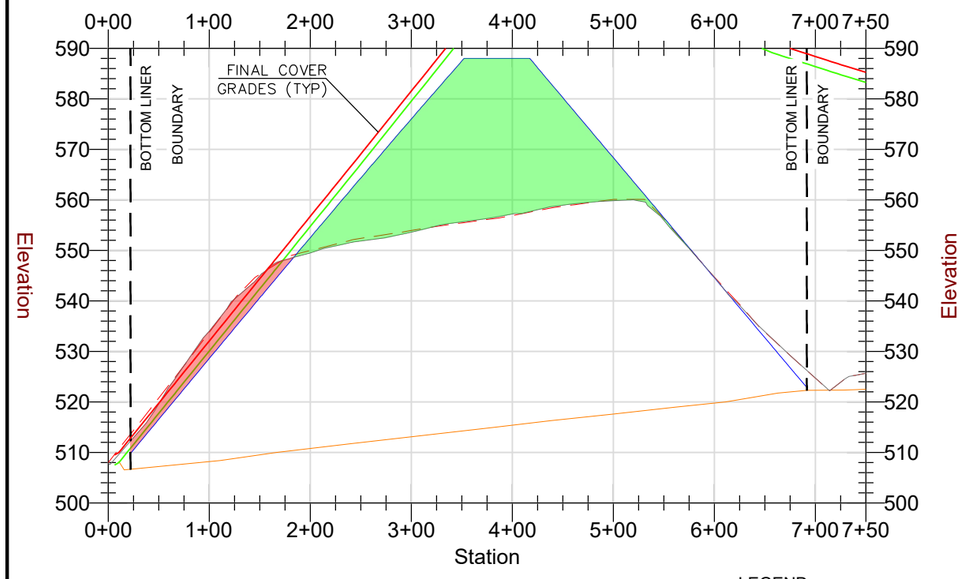
SCALE:

VERTICAL: 1" = 150'
HORIZONTAL: 1" = 30'
VERTICAL EXAGGERATION: x5

ALIGNMENT A-A'

LEGEND

- PREVIOUS 2023 TOPOGRAPHY
- EXISTING 2024 TOPOGRAPHY
- INTERIM COVER GRADES
- PERMITTED FINAL WASTE GRADES
- PERMITTED BOTTOM LINER
- AIRSPACE
- EXCESS SOIL FILL



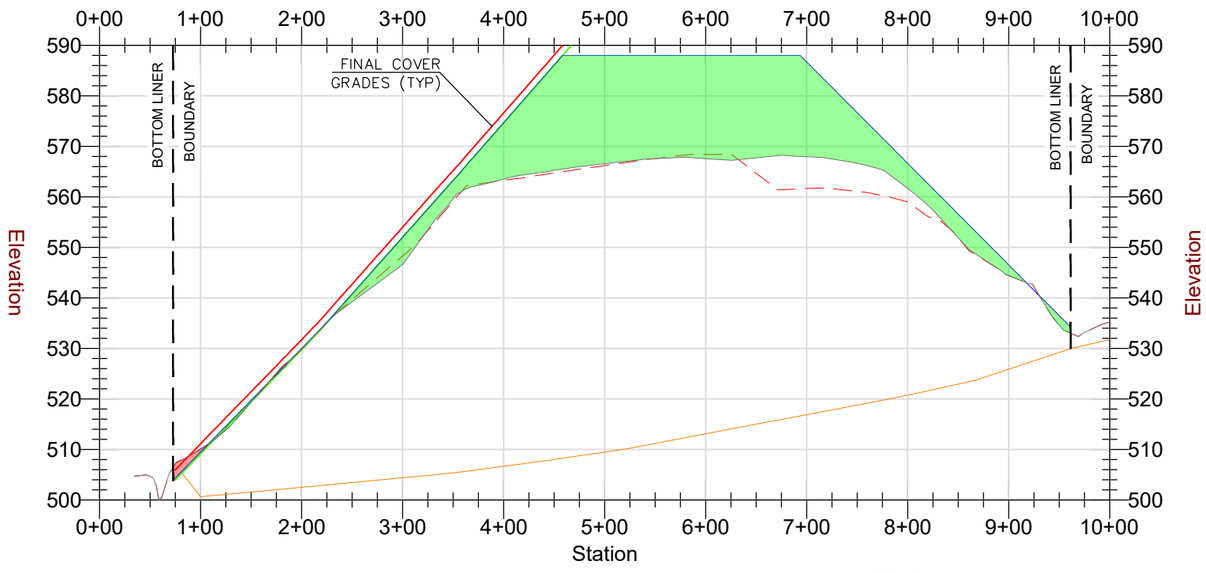
SCALE:

VERTICAL: 1" = 150'
HORIZONTAL: 1" = 30'
VERTICAL EXAGGERATION: x5

ALIGNMENT B-B'

LEGEND

- PREVIOUS 2023 TOPOGRAPHY
- EXISTING 2024 TOPOGRAPHY
- INTERIM COVER GRADES
- PERMITTED FINAL WASTE GRADES
- PERMITTED BOTTOM LINER
- AIRSPACE
- EXCESS SOIL FILL



SCALE:

VERTICAL: 1" = 150'
HORIZONTAL: 1" = 30'
VERTICAL EXAGGERATION: x5

ALIGNMENT C-C'

LEGEND

- PREVIOUS 2023 TOPOGRAPHY
- EXISTING 2024 TOPOGRAPHY
- INTERIM COVER GRADES
- PERMITTED FINAL WASTE GRADES
- PERMITTED BOTTOM LINER
- AIRSPACE
- EXCESS SOIL FILL

REV.	DATE	BY	DESCRIPTION

CROSS SECTIONS SHOWING FINAL COVER GRADES

2023 ANNUAL ENGINEERING INSPECTION REPORT

B&F ENGINEERING, INC.

CEDAR GLADES CLASS 4 LANDFILL

GARLAND COUNTY ARKANSAS

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

FIGURE 4

DESIGNED BY:	DAP
DRAWN BY:	DAP
APPVD. BY:	FOC
SCALE:	SEE BARSCALE
DATE:	JUNE 2024
JOB NO.	009-006-35247095
ACAD NO.	003
SHEET NO.:	4 OF 4

STAKING POINT	EASTING	NORTHING	FWG ELEVATION	DESCRIPTION
3	984,855.46	1,993,505.59	528.27	OF
4	984,900.00	1,993,500.00	531.04	OF
5	984,800.00	1,993,500.00	523.02	OF
6	984,700.00	1,993,450.00	518.09	OF
7	984,750.00	1,993,450.00	525.60	OF
8	984,800.00	1,993,450.00	533.12	OF
9	984,700.00	1,993,400.00	528.07	OF
10	984,646.21	1,993,400.90	519.92	OF
11	984,942.09	1,993,479.01	533.92	OF
12	984,875.37	1,993,544.55	521.02	OF
13	984,509.55	1,993,094.71	525.99	OF
14	984,564.57	1,993,030.95	542.35	OF
15	984,382.34	1,992,742.93	506.65	OF
16	984,445.55	1,992,630.08	506.96	OF
17	984,544.00	1,992,521.23	513.44	OF
18	984,570.04	1,992,471.87	514.21	OF
19	984,593.01	1,992,418.30	513.99	OF
20	984,571.00	1,992,575.28	525.44	OF
21	984,681.94	1,992,281.32	520.33	OF
22	984,657.44	1,992,348.02	521.55	OF
23	984,747.46	1,992,289.27	537.32	OF


210G
LC