ADEQ

ARKANSAS
Department of Environmental Quality

November 9, 2012

Waste Management of Arkansas, Inc.
Attn: Mr. David Conrad
100 Two Pine Drive
North Little Rock, AR 72117

RE: Name Change of Permit from Two Pine Landfill, LLC to Waste Management of Arkansas, Inc.
Permit Number: 0163-S1-R3 **AFIN: 60-00438**
Document Number: 63116 **Cross Reference Number: 63111**

Dear Mr. Conrad:

The Arkansas Department of Environmental Quality- Solid Waste Management Division staff has reviewed your request for name change of Solid Waste Permits 0163-S1-R3 from Two Pine Landfill, LLC to Waste Management of Arkansas, Inc.

Based on the submittals received requesting this change, the Arkansas Department of Environmental Quality hereby approves the owner name change from Permit Number 0163-S1-R3 to Waste Management of Arkansas, Inc. An updated copy of the permit is attached. Please review all terms and conditions of the permit to ensure compliance with all applicable requirements.

Please call me at (501) 682-0601 should you have any questions regarding the above information.

Sincerely,

Karen Bassett

Karen Bassett, Acting Chief
Solid Waste Management Division

Enclosure: Updated permit

cc: Susan Speake, Programs Branch Manager SWMD
Charles Stringer, District Field Inspector SWMD
Scott McWilliams, Enforcement Coordinator SWMD
Bryan Leamons, Technical Branch Manager SWMD
Jennifer Harmon, Terracon

PERMIT
FOR THE CONSTRUCTION AND OPERATION OF A SOLID WASTE DISPOSAL FACILITY

ISSUED BY

STATE OF ARKANSAS
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOLID WASTE MANAGEMENT DIVISION

Class 1 Landfill

Permit Number	**0163-S1-R3**
AFIN	**60-00438**
Effective Date	April 21, 2008 September 7, 2012 [owner name change]
Permit Owner & Address	Waste Management of Arkansas, Inc. 100 Two Pine Road North Little Rock, AR 72117
Facility Site Name & Address	Two Pine Landfill 100 Two Pine Road North Little Rock, Pulaski County, AR 72117
Location	At the junction of the North Belt Freeway (Highway 440 with Highway 67-167, between Highway 67-167 and the Union Pacific RR. and between the City of Sherwood and the City of Jacksonville.
Permitted Landfill Area	239.5± Acres
Property Area	530± Acres
Financial Assurance	$6,170,580.00
Design Engineer/Consultant	Terracon Consultants, Inc. 25809 I-30, Bryant, AR 72022 and Riley Park Hayden/RPH Engineers 3005 Breckenridge Boulevard Duluth, GA 30096

This permit authorizes the operation of the solid waste disposal facility as set forth in the permit application prepared by Waste Management Two Pine Landfill, LLC, hereinafter called "owner" or "permittee," and received by the Department of Environmental Quality on August 24, 2006. The application was completed through a series of documents furnished by the applicant as referenced within this document. This permit is issued pursuant to the provisions of the Arkansas Solid Waste Management Act (Arkansas Code Annotated 8-6-201 et seq.) as amended, hereinafter called the "Act"; Regulation Number 22, Arkansas Solid Waste Management Code, as adopted by the Pollution Control and Ecology Commission, hereinafter called Regulation 22; and all other applicable rules and regulations of the Department of Environmental Quality, hereinafter called "Department", and the following terms and conditions:

DESCRIPTION OF THIS PERMIT ACTION

This modification is for the lateral expansion of the Two Pine Class 1 Landfill. On the effective date, this permit supersedes all prior solid waste permits issued by the Department for this Class 1 Permit.

PERMIT CONDITIONS

1. This permit is for an approximately 239.5± acre waste disposal site as indicated on the approved plans. The final grades and elevations shall not be exceeded at any time or in the anticipation of settlement and consolidation of the waste mass. This permit shall expire when the authorized fill elevations have been attained and the facility is closed out in accordance with the provisions of Regulation 22, whichever occurs first.

    a. The Department shall be notified in writing upon construction of each disposal unit and upon facility closure in order that it may be inspected.

    b. Changes to or deviations from the construction/layout and operation of the facility, as indicated on the approved facility plans indicated below, and on the approved permit application documentation, are not authorized unless approved in writing by the Department.

    c. The approved application document is filed under the Document Identification Number 36562. Exceptions to 36562 are approved as referenced below.

2. The initial total amount of financial assurance is $6,170,580.00. Of this amount $3,859,725.00 dollars will be required for closure costs $2,310,855.00 will be required for the post-closure costs. This amount shall be subject to annual adjustments and may be increased at the discretion of the Department based upon the estimated cost for a third party to close the largest area requiring final cover during the active life of the facility and the cost for a third party to perform post closure care.

    a. The instruments used must be in one of the forms set forth in Regulation 22 or as otherwise approved by the Department.

    b. Operations allowed under this permit shall not commence until all financial assurance is satisfactorily filed with the Department.

    c. A portion or all of the financial assurance may be held by the Department beyond the time of cessation of disposal operations at the site to ensure satisfactory closure and post closure care in accordance with Regulation 22.

    d. No more than 50 acres of active disposal area shall be open in the new landfill expansion area. This requirement shall be addressed each year in the facility Annual Engineering and Inspection Report.

3. This permit is for the disposal of all waste eligible for a Class 1 sanitary landfill waste including all "special materials" as outlined in Regulation 22.701-708. Special Materials as identified in Regulation 22 do not require written authorization from the Department, provided the materials not specifically identified by the Special Materials section must be characterized by the

generator of the waste prior to acceptance for disposal in the landfill in accordance with the facility written hazardous waste exclusion program.

4. Each landfill waste cell shall be constructed in the sequence indicated in the approved plans and specifications. See Condition 17 for approved plans.

5. The bottom liner system for any newly constructed waste cell must consist of a minimum 60 mil HPDE flexible membrane liner and a minimum of twenty-four inches of compacted clay exhibiting a maximum hydraulic conductivity of 1×10^{-7} centimeters per second (cm/s). In areas designated by "Composite High Potentiometric/Piezometric Surface vs. Liner Isopach," DIN 51148, 3' engineered buffer shall also be constructed additional to the bottom liner with a maximum hydraulic conductivity of 6×10^{-7} centimeters per second (cm/s) and in accordance with the approved design.

   a. Proper construction of the bottom clay liner of each waste cell shall be observed and certified to the Department by a Registered Professional Engineer in a Construction Certification Report in accordance with the approved CQA Plan whenever a cell is prepared for use.

   b. The Construction Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation, and extent of area(s) actually constructed for use; and test locations.

   c. The Certification Report shall be submitted to the Department at least fourteen (14) days prior to waste placement in that cell.

6. The permittee shall implement the Hazardous Waste Exclusion Plan presented in Solid Waste Management Division Document Identifier (DIN) 51046. In addition to the implementation of the approved Hazardous Waste Exclusion Plan, the facility shall fully meet all requirements of Reg.22.412 regarding the exclusion of all unauthorized waste streams.

7. The permittee shall implement the Landfill Gas Monitoring Plan presented in Solid Waste Management Division DIN 36562. In addition to the implementation of the approved Landfill Gas Monitoring Plan, the facility shall fully meet the requirements of Reg.22.415 regarding the control of explosive gases. The facility shall monitor each of the gas monitoring probes detailed in the approved Landfill Gas Monitoring Plan and within all structures at the facility on a quarterly basis. The results shall be submitted to the Department within 14 days of each monitoring event.

8. The permittee shall implement the requirements detailed in the Operating Plan and Narrative presented in Solid Waste Management Division DIN 51046. In addition to the implementation of the approved Operating Plan and Narrative, the facility shall fully meet the requirements of Regulation 22.

9. The permittee shall implement the Construction Quality Assurance Plan presented in Solid Waste Management Division Document Identifier 51148. In addition to the implementation of the approved Construction Quality Assurance Plan, the facility shall fully meet all requirements of Reg.22.428. The facility shall be required to submit construction plans and specifications to the Department prior to each construction event at the facility.

10. The permittee shall implement the Closure and Post Closure Plan presented in Solid Waste Management Division DIN 51046. In addition to the implementation of the approved Closure and Post Closure Care Plan, the facility shall fully meet all requirements of Reg.22.1301 and Reg.22.1302. The post closure maintenance period for this facility shall be a minimum of 30

(thirty) years starting on the date the Department accept closure of the facility. The length of the post closure period may be decreased or increased by the Director in accordance with Regulation 22.1302(c) (4). Closure Certification Reports for final cover construction shall be submitted to the Department in accordance with regulation 22.1301 and in accordance with the approved closure plan.

11. Leachate collection removal and leachate storage systems shall be monitored and operated such that free flowing conditions are maintained in the leachate collection system. Leachate which is disposed in publicly owned treatment works (POTW) must comply with 40 CFR Part 403 (U.S. EPA Pretreatment regulations). Leachate shall otherwise be managed in accordance with the Leachate Management Plan found in Solid Waste Management Division DIN 51046.

12. At all times the disposal facility shall be maintained in good condition and operations shall be conducted by licensed, qualified on-site operator holding the appropriate license as required by Regulation Number 27, Certification of Sanitary Landfill Operators. Copies of the approved operating narrative, approved permit plans/specifications, operator licenses, stormwater pollution prevention plan (SWPPP), NPDES construction and/or stormwater permit(s) for the facility, and this disposal permit shall be maintained at the site for reference.

13. This permit may be revoked or modified whenever, in the opinion of the Department, the facilities are no longer in compliance with the Act, Regulation 22 and the applicable rules and regulations. This permit shall not relieve the permittee, its agents or employees from compliance with all provisions of the Act and Regulation 22.

14. The Department may issue modifications or amendments to this permit governing the design, operation, maintenance, closure or post-closure of the facility during the term of this permit. Such modifications or amendments shall be attached to this permit and shall be fully maintained and enforceable as a condition or conditions of this permit.

15. This permit is issued in reliance upon the statements and representations made in the application, operating narrative, the plans, specifications and related documents and the Department has no responsibility for the adequacy or proper functioning of the disposal facility. Nothing herein contained shall be construed as releasing the permittee form any liability from damage to persons or property by reason of the installation, maintenance operation of the disposal facility.

16. The Department, its employees, agents, or any authorized person shall have the right to enter the property at any time for any reason as set out in Regulation 22 for the purposes of, including but not limited to taking samples, reviewing the operating record, inspecting the facility and performing other enforcement or engineering action without interference or delay from the permittee.

17. The approved permit plans for the facility are as follows:

Landfill Cell Development Plan	Sheet 3 of 26 Doc. ID# 36562
Final Development Plan	Sheet 4 of 26, Doc. ID# 36562
Subgrade Development Plan 1	Sheet 6 of 26, Doc. ID# 36562
Subgrade Development Plan 2	Sheet 7 of 26, Doc. ID# 36562
Top of Clay Liner Development Plan 1	Revised Sheet 8, Doc. ID# 51046

Top of Clay Liner Development Plan 2	Revised Sheet 9, Doc. ID# 51046
Final Cover Plan	Revised Sheet 12, Doc. ID# 51046 Document ID Number 10509
Final Cover Plan 2	Revised Sheet 13, Doc. ID# 51046
Stormwater Plan 1	Sheet 14 of 26,Doc. ID# 36562
Stormwater Plan 2	Sheet 15 of 26, Doc. ID# 36562
Gas Management Plan	Sheet 16 of 26, Doc. ID# 36562 Document ID Number 10509
Leachate System Details	Sheet 22 of 26, Doc ID# 36562
Leachate System Details 2	Revised Sheet 23, Document ID# 51046
Cross Section A-A' through Cross Section I-I' & Composite High Potentiometric/ Piezometric Surface vs. Liner Isopach	Sheets 1 through 6 & Sheet 1 of 1, Doc ID# 51148
Landscaping Plan & Visual Screening Berm	Doc. ID# 52331

18. An initial permit fee has been received by the Department. Annual fees due thereafter shall be assessed in accordance with Regulation Number 9, Fee System for Environmental Permits. Failure to pay annual fees when due may result in revocation of this permit.

19. Any change in ownership or control of the operation of this landfill may be considered a permit modification and shall be fully disclosed to the Department. For purposes of this permit, ownership or control shall be determined by a change in the debt or equity of the permittee of five percent (5%) or more. Notwithstanding the above, the permittee is not required to disclose a change in ownership or control of the facility if the change is among the persons and/or entities previously disclosed to the Department in Section E of the Disclosure Statement or similar disclosure.

20. Disposal of bulk liquid waste in the landfill is prohibited. "Liquid waste" is waste which contains "free liquids" as defined by Methods 9095 (Paint Filter Test) as described in EPA Publication No. SW-846. Liquid wastes are permitted to be managed and disposed in accordance with the Liquid Waste Management Plan located in Solid Waste Management Division DIN 36562.

21. Measures to control and prevent storm water run-on from running through or into the active disposal area shall be constructed and maintained. Grading, dikes, diversion ditches, silt fencing, silt, traps, and other best management practices (BMP) for storm water control shall be provided as necessary to control/prevent off-site sediment accumulation from landfill related operations.

22. Appropriate NPDES construction/storm water permit(s) shall be obtained for storm water discharges from the landfill site and borrow sites. A Storm Water Pollution Prevention Plan (SWPPP), which outlines erosion and sediment control measures, shall be prepared and

implemented in accordance with applicable NPDES requirements. A copy of the SWPPP shall be maintained on-site for reference by operating staff.

23. The permittee shall comply with the air criteria requirements of Regulation 22.416. Those requirements include meeting the State Implementation Plan (SIP) pursuant to Section 110 of the Clean Air Act; prohibiting open burning of solid waste, unless authorized by the Department; and establishing fire safety procedures.

24. Litter control fences shall be provided in the active fill area for the control of blowing litter. Other litter control measures shall be implemented, if necessary, to confine litter to the smallest practicable extent and prevent litter from leaving the site.

25. The permittee must cover disposed waste with at least six inches of soil at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging. No portion of the waste is to be left exposed at the end of the operating day. Alternative materials for daily cover, such as synthetic materials, shall only be used when specifically authorized in writing by the Department. Any alternative daily cover that is proposed by the permittee must comply with Department guidelines and include specific written operating procedures that will be implemented to control disease vectors, fires, odors, blowing litter, and scavenging. The use of synthetic material will not be authorized unless it is incorporated within operating procedures that also rely on use of at least six inches of soil cover for daily cover on some days; any proposal for daily cover based solely upon full-time use of synthetic material will not be approved.

26. The final grades and elevations shown on the plans shall not be exceeded at any time or in anticipation of settlement and consolidation of the waste mass.

    a. Timely initiation and completion of closure of landfill cells or units shall be made in accordance with Regulation 22.1301(f) and (g).

    b. Proper construction of the final cover system shall be observed and certified in writing to the Department by a Registered Professional Engineer in a Construction Certification Report in accordance with the approved CQA Plan whenever a cell, area or phase of the landfill is closed-out.

    c. The Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation and extent of closed area(s); and test locations.

27. This permit authorizes one (1) active disposal area at the facility per Section 22.411 (c) of Regulation 22. Multiple working faces shall not be utilized at the facility unless the permittee can provide adequate justification for more than one working face and specific authorization for such is granted in writing by the Department. It is not anticipated that such authorization will be granted except on a temporary basis for highly unusual or emergency situations.

28. The Department's decision to issue this permit is final for purposes of appeal as of the date indicated in the Certificate of Service below. If any provision of these conditions or the application of these conditions thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of these conditions that can be given effect without the invalid provision or application. Therefore, to this end, the provisions of these conditions are declared to be severable.

29. The groundwater monitoring system will be monitored per the standard provisions of Regulation 22. A groundwater monitoring system shall be established and maintained at the facility that

consists of a sufficient number of wells or sampling points, installed at appropriate locations and depths that will yield representative samples of groundwater quality. The monitoring system shall be installed operated and maintained in accordance with the approved design specifications throughout the active life of the facility and throughout the post-closure care period.

30. The initial groundwater monitoring system for the WM Two Pine Class 1 landfill consists of 23 monitoring wells (MW-04A, MW-5N, MW-8R, MW-09R, MW-10A, MW-10B, MW-12, MW-14B, MW-15, MW-19, RMW-06R, nested wells: MW-20S, MW-21S, MW-22S, MW-23S, MW-24S, MW-25S, MW-20D, MW-21D, MW-22D, MW-23D, MW-24D and MW-25D) as shown on the Revised Figure 2 (DIN 51276) of the approved Sampling and Analysis Plan (DIN 51202). All new and existing monitoring wells will be considered as one monitoring well system. Any modification of the groundwater monitoring system will follow the provisions of Regulation 22.

31. Nested monitoring wells (MW-21S, MW-21D, MW-22S, MW-22D, MW-23S and MW-23D) will be replaced as landfill operations proceed northward toward the nested wells installed within the expansion area footprint and prior to the construction of Cells 10 and 11. Any decommission or replacement monitoring wells will follow all the provisions as stated in Regulation 22.1103 and will require SWMD approval.

APPROVED BY: **Arkansas Department of Environmental Quality**
5301 Northshore Drive
North Little Rock, Arkansas 72218

Karen Bassett
For Teresa Marks
11/9/12
Date

CERTIFICATE OF SERVICE

I, Tommi West, hereby certify that a copy of this permit has been mailed by first-class mail to Mr. David Conrad, 100 Two Pine Drive, North Little Rock, AR 72117, on or before this 13th day of November, 2012.

Permit Modification Application Summary and Rationale
Waste Management Two Pine Class 1 Landfill
Permit No. 0163-S1-R3; AFIN No. 60-00438

Permit Application Summary

This summary form consists of information submitted during the permitting process. It represents basic information from the administrative record utilized in forming recommendations from the Solid Waste Management Division. The entire file for the solid waste permit application specified below should be reviewed for complete details on the proposed facility.

Permit Application Summary	
1. Name of Applicant:	Waste Management of Arkansas, Inc.
2. Type of Facility:	Class 1 landfill
3. Engineering Firm:	Terracon Consultants, Inc. and Riley Park Hayden/RPH Engineers
4. Application Date:	Submitted on August 24, 2006 Submitted on September 4, 2012 [owner name chame]
5. Site Location	General: The site is located at the junction of the North Belt Freeway (HIGHWAY 440 with Highway 67-167 and the Union Pacific Railroad and between the City of Sherwood and the City of Jacksonville. Specific: Located in the parts of Sections 35 and 36, T-3-N, R-11-W; and in part of Section 2, T-2-N, R-11-W, Pulaski County, Arkansas.
6. Permit Area:	Total Property Area: 530± acres Permitted Landfill Area: 239.5± acres
Residences Within 2 Miles:	More than 100 in Sherwood and Jacksonville, Arkansas
Water Supplies Within 1/2 Mile:	Domestic water wells located within 0.5 mile of the expansion area were identified from the States' water well inventory files at the Arkansas Geological Commission. Three domestic water wells are located within one-half mile of either the current landfill boundary or from the proposed expansion area boundary. Two of these wells are located east of the site, while one is located north of the site across State Highway 67-167.
Wetlands:	Two types of wetlands were identified during wetland delineation activities: Riverine, intermittent, excavated streambed, seasonally flooded (Impacted Area 1). This area exhibits wetland conditions in a drainage channel that is approximately 0.2 acre and runs northwest between the current borrow area and the cultivated area at the site. Impacted Area 2 – palustrine, forested, broad-leaved deciduous, temporarily flooded is a narrow strip of woods that extends south from the Missouri-Pacific Railroad into the Proposed Borrow Area and comprises approximately 4.7 acres of wetland drainage. Additionally, impacted Area 2 includes approximately 9.21 acres of the western portion of bottomland hardwood forest that will adjoin the proposed landfill expansion area. The two wetland areas above will be impacted as a result of the proposed expansion. Wetland mitigation activities will take place to compensate for the loss of function and values of these impacted wetlands at the project site. The area proposed for wetland mitigation is approximately 43 acres of property previously cultivated for soybeans which will be restored to a bottomland

Permit Application Summary	
	hardwood forest.
Geology	The site is located within the Mississippi Embayment Physiographic Province in central Arkansas. Geology beneath the site consists of sediment and rock from the Quaternary, Tertiary and Paleozoic Systems. The exposed surficial stratum at the landfill is comprised of Quaternary-aged terrace deposits and alluvium which overlies a discontinuous Tertiary-aged Wilcox Group which stratigraphically overlies the Tertiary-aged Midway Group which rests unconformably above the Pennsylvanian-aged Atoka Formation. The lateral expansion area lies within the Arkansas River water basin in central Arkansas. This fluvial depositional environment has resulted in a complex nonuniform and highly variable surficial and shallow subsurface stratigraphy both vertically and horizontally. The Quaternary-aged alluvium is discontinuous and composed of silty clays, sand and clay zones. Buried stream deposits at the site are composed primarily of Pleistocene-aged alluvial and channel sediments deposited in point bar sequences. The alluvial deposits along Bayou Meto and the Arkansas River floodplains grade upward from coarse sand and gravels to fine silts and clays of overbank deposits.
Soils:	Regional soils located near the site consist of the Moreland silty clay, Rexor silt loam, Smithdale fine sandy loam, and the Amy silt loam (USDA, 2006). The Moreland series represents approximately 70 percent of the Two Pine Landfill site and is located in the southwestern two-thirds of the site with a small portion along the north bordering Bayou Meto while 20 percent is represented by the Rexor series located in the northeastern quarter. Less than 5 percent each is represented by the Smithdale and the Amy series. The Smithdale is located along the eastern boundary and the Amy silt loam is found in the extreme northeast corner along Bayou Meto.
Ground Water:	Regionally the primary potable source of groundwater in Pulaski County is the Quaternary-aged alluvial aquifer. At the Two Pine Landfill site, groundwater is generally first encountered within the Quaternary shallow fluvial deposits where present and when absent in the Pleistocene-aged unconsolidated stream and terrace deposits. The shallow, fluvial deposits may act as localized recharge zones for the transmission of groundwater to the Quaternary and other water bearing aquifers.
Surface Drainage Sequence:	Topographically the site is relatively flat with site drainage poor to fair. Bayou Meto, a stream located approximately 0.5 mile north/northeast of the Two Pine Landfill site, and its tributary, Five Mile Creek, drain the Two Pine property and adjacent areas. The Two Pine Landfill is located within the 100-year floodplain of Bayou Meto. The surface drainage of the landfill site has been augmented by a series of drainage ways that channel water to the northwest, discharging into Brushy Island Creek and eventually into Bayou Meto.
Waste Streams:	Class 1 Municipal Solid Waste as defined in Arkansas Regulation 22.
Capacity:	Total Capacity = 34,400,000 cubic yards
Disposal Rate	896,000 cubic yards per year (approximately may vary)
Projected Active Life after this modification	24 years (approximately, will vary with waste received)
Bottom Liner System:	60 mil HPDE flexible membrane liner and a minimum of twenty-four inches of compacted clay exhibiting a maximum hydraulic conductivity of 1×10^{-7} centimeters per second (cm/s).

Permit Application Summary	
Final Cover:	Alt. Cover 1: Consists of an intermediate soil cover, 18 inch clay liner with hydraulic conductivity of 1 x 10^{-7} centimeters per second (cm/s), 40 ml geomembrane, geocomposite drainage net, 12 inch final cover soil layer and 6 inch final cover soil layer capable of supporting vegetation. Alt. Cover 2: Consists of an intermediate soil cover, 12 inch clay liner with hydraulic conductivity of 1 x 10^{-6} centimeters per second (cm/s), 50 ml microspike HDPE drain liner, geotextile, 12 inch final cover soil layer and 6 inch final cover soil layer capable of supporting vegetation.

Permit Summary and Rationale

The following information was considered during the preparation of a draft permit for the proposed facility:

- Permit Pre-Application dated January 6, 2000.
- Permit Application dated August 24, 2006. The application was later completed through documents furnished on November 29, 2007 and December 21, 2007
- Correspondence from the Permittee; The Arkansas Solid Waste Management Code, as Amended (Regulation Number 22); and All other applicable rules and regulations of the Arkansas Department of Environmental Quality.
- Name change request, September 4, 2012.

Condition No.	Permit Conditions
1	Concerns the expiration of the permit. The permit will expire when the facility is filled to permit capacity and closed out in accordance with Regulation 22 and the approved Closure Plan.
2	Specifies the initial amount of financial assurance. (Regulations 22.1402 and 22.1043).
3	Concerns the type of disposal material permitted for the Class 1 landfill including special materials outlined in Regulation 22.701-708.
4	Concerns the construction sequence of each waste cell as indicated by the approved plans and specifications.
5	This permit condition establishes the approved bottom liner system configuration of the landfill.
6	This permit condition identifies the approved Hazardous Waste Exclusion Plan for the facility as required by 22.412.
7	This permit condition details the approved Explosive Gas Monitoring System and Plan as required by 22.415.
8	This permit condition establishes the approved Operating Plan and Narrative as required by Regulation 22.
9	This condition establishes the approved CQA Plan for the facility and requires review of construction documents prior to al construction events.
10	This permit condition establishes the approved Closure and Post Closure Care Plan for the facility as required by Regulation 22.1301 and 22.1302.
11	Specifies the leachate collection removal and leachate storage systems shall be monitored and operated such that free flowing conditions are maintained.
12	Concerns requirements to maintain the disposal facility in good operating condition under licensed, qualified, on-site landfill operators in accordance with Section 22.411 of Regulation 22 and with Regulation 27.
13	Concerns the right of the Department to revoke or modify the permit in the event the facility is no longer in compliance with the Arkansas Solid Waste Management Act, Regulation 22, or other applicable regulations in accordance with Section 22.308 of Regulation 22
14	Concerns issuance of modifications to the permit by the Department is in accordance with Sections 22.308 and 22.422 of Regulation 22.

Condition No.	Permit Conditions
15	States the Department has no responsibility for the proper functioning of the disposal facility and the permittee is not exempt from liability to third parties per Regulation 8.
16	Concerns the right of Department employees to enter the permittee's property to inspect the facility at any time without interference or delay as in accordance with Section 22.1501 of Regulation 22.
17	This permit condition details the approved landfill plans for the facility. Any changes to the plans listed will require a modification to the facility permit.
18	Concerns the payment of annual fees associated with the permit in accordance with Regulation 9. Failure to pay the annual fee may result in revocation of the permit.
19	Concerns permit transfer and disclosure is in accordance with Act 454 of 1991.
20	This condition restricts the disposal of bulk liquid waste at the facility.
21	Concerns the measures to control and prevent storm water run-on through or into the active disposal area.
22	Specifies the requirements for appropriate NPDES permit(s) and Storm Water Pollution Prevention Plan is in accordance with Sections 22.418, 22.419 and 22.427 of Regulation 22 and the Clean Water Act.
23	Concerns complying with the air criteria requirements of Regulation 22.416 including the requirements of the State Implementation Plan of the Clean Air Act. Also, prohibiting the open burning of solid waste and establishing fire safety procedures.
24	This permit condition requires the use of litter control fences or other litter control measures to be implemented for the control of blowing litter.
25	Specifies the requirement for daily or more frequent cover to prevent vectors, odors, fire, litter and scavenging. Alternative daily cover must comply with Department guidelines and include specific written operating procedures.
26	Specifies the final grades and elevations shown on the plans shall not be exceeded at any time. Requirements for a timely closure, proper construction of the final cover system and Certification Report in accordance with 22.1301.
27	This permit condition authorizes one (1) active disposal area. Authorization for a second working face may be granted provided adequate justification.
28	Concerns providing notice for the purpose of appeal of the final permit in accordance with Section 22.306 of Regulation 22 and in accordance with Regulation 8. Provisions regarding severability are in accordance with Section 22.1601 of Regulation 22.
29	This permit condition specifies that the groundwater monitoring system at the facility will be established, maintained, and monitored per the standard provisions of Regulation 22.
30	Specifies that the groundwater monitoring system for the landfill will include all new and preexisting monitoring wells and will be considered as one monitoring well system. Any modifications to the monitoring well system will be in accordance with Regulation 22.
31	Concerns specific monitoring wells that will be decommissioned and replaced due to landfill construction sequence of specific waste cells. Specifies that any decommission or replacement monitoring wells will be in accordance with Regulation 22.

This document was reviewed by Maria Matoska, Permit Engineer, Bryan Leamons, Engineer Supervisor and Kay McQueen, Geologist ***

ADEQ

ARKANSAS
Department of Environmental Quality

April 21, 2008

Waste Management-Two Pine Landfill, LLC
Attn: Mr. Wayne Mangum
100 Two Pine Road
North Little Rock, AR 72117

RE: Issuance of Waste Management Two Pine Class 1 Landfill Final Permit
Permit Number: 0163-S1-R3 AFIN: 60-00438
Document ID #: 52354; Cross Reference #: 51319

Dear Mr. Mangum:

Enclosed is a permit authorizing for the construction, operation, and maintenance of the Waste Management Two Pine Class 1 Solid Waste landfill facility as described in your application submitted on August 24, 2006. The permit number for the facility is 0163-S1-R3. The decision to issue the permit is based upon 1) the information contained in the permit application; 2) other materials submitted by the applicant, 3) written comments received during the designated 30-day public comment period.

The permit is granted subject to the terms and conditions specified in the permit. The initial amount of financial assurance required is $6,170,580.00 for the facility. Acceptable mechanisms for financial assurance include a surety bond, collateral bond (supported by a letter of credit, securities or cash), or other mechanisms as set forth in Chapter Fourteen of Regulation Number 22. The instruments used must be in the exact form set forth in Regulation Number 22 and must be filed with the Department before the permit can become effective. The purpose of the financial assurance is to ensure an environmentally sound closure of the site upon conclusion of disposal operations and acceptable post closure care. Please review all terms and conditions of the permit to ensure compliance with all applicable requirements.

Operations authorized under this permit may begin only after written notification from this Department is sent to the permittee that the following items have been submitted and approved by the Department: a) financial assurance, b) construction quality assurance test results, c) engineering certification of initial construction, and d) as-built drawings of initial construction. Please review all terms and conditions of the permit to ensure compliance with all applicable requirements.

Any person with legal standing in this matter may appeal the Department's final decision to the Arkansas Pollution Control and Ecology Commission. Appeals must be in writing, must be filed within thirty (30) days of the Department's final decision, and must conform to all applicable laws and regulations. General information on appeal procedures may be obtained by contacting the Legal Division of the Department, at 501-682-0892.

Thank you for your cooperation on this matter. If you have any questions, or if we may be of service, please feel free to contact the Solid Waste Management Division at (501) 682-0602.

Sincerely,

Michael Robinson
Chief - Solid Waste Management Division

Enclosures: Response to Comments
Permit
Permit Summary and Rationale

cc: Ken Bown, kebown@terracon.com
Heidi Love, Inspector Supervisor SWMD

Response to Comments

On January 19, 2008 the Arkansas Department of Environmental Quality issued a draft permit associated with the construction and operation of the Waste Management Two Pine Class 1 Landfill. After the close of the 30-day comment period the ADEQ-SWMD received comments from the public (**Document Numbers 51570, 51587, and 51646**). The following are the SWMD responses to the facility comments.

Comment 1 received from James M. Yoast:

Comment was made regarding the visibility of the landfill from Highway 440.

Response to Comment 1:

APC&EC Regulation 22, Solid Waste Management Rules §22.408(c) states that landfills shall comply with regulations promulgated by the State of Arkansas Highway and Transportation Commission.

ADEQ Solid Waste Permit 0163-S1-R2 was issued on March 29, 2001. This permit action was issued in response to Waste Management's application for permit modifications. Some of those approved site modifications necessarily resulted from the Highway Department's final acquisition of right of way between permitted waste disposal acreage. Determinations made during that permit action mandate Waste Management's implementation of a landscaping plan. Updated plans were submitted and approved on August 7, 2003 and were applicable to both sides of the Highway 440 right of way. Recently, updated landscaping plans have been submitted and also deemed acceptable. The updated plans indicate preferred vegetative species and also include plans for a visual operations screening berm between Highway 440 and landfill operations. Specific reference to the approved Landscaping Plan and Screening Berm has been added to Specific Condition 17 of the final permit.

Comment 2 received from Lee Jeffrey and the Brushy Island Community Organization:

This comment refers to a positive relationship between the Brushy Island Community and Waste Management Two Pine Landfill.

Response to Comment 2:

The statements have been logged to the facility file. No changes were made to the final permit.

Comments 3 through 7 received from citizens from Jacksonville and North Little Rock:

Comment 3 addresses the proximity to residences in Jacksonville.

Response to Comment 3:

Regulation §22.408 requires new Class 1 landfills and expansions to comply with minimum separation distances and buffer zones as measured from the active portion of the landfill. §22.408(a)(2) requires that a separation distance shall be three hundred feet from an existing dwelling as determined by the earliest date the notification or application is made to the local or regional authorities as required by Regulation §22.201, Regulation §22.202 or Regulation §22.203. At the time a Pre-Application for the Two-Pine facility was submitted the nearest dwelling was approximately 1635 feet from the proposed landfill.

No changes were made to the final permit.

Comment 4 addresses the future growth of the area and real estate values.

Response to Comment 4:

ADEQ does not specify site locations for Solid Waste Facilities and will not approve locations that do not meet applicable siting requirements within Regulation 22. In order to obtain ADEQ approval for a proposed site, ADEQ requires applicants to document successful completion of several required local approval processes. Each of these processes considers a variety of factors including community needs and provides opportunity for public involvement.

Prior to obtaining a solid waste permit, new landfills or expansions to permitted facilities shall obtain local authority approval of the site selection or expansion as required by Regulation §22.203. Whether the solid waste facility is located within a municipality, county or regional solid waste district, specific geographic site approval must be obtained for submission to the ADEQ with the pre-application.

The issuance of a Certificate of Need is also required by Regulation 22.205. The issuance of the CON is based upon an evaluation of the information submitted by the applicant in the petition for a CON, the location of the applicant's proposed facility based on the district's needs and its highway and road system, and the need for a landfill application based upon the district's remaining capacity that is currently permitted for operation. Other factors are also considered when issuing or denying a CON as listed in Reg.22.205(c).

Waste Management Two Pine Landfill has complied with Regulation 22.203 by acquiring permission from the City of Jacksonville for the proposed expansion and modification of the landfill. Resolutions were passed by both the City of Jacksonville and the Pulaski County Regional Solid Waste Management District on May 20, 1999. A notice of intent to apply for a Certificate of Need was submitted to the Pulaski County Solid Waste Management District (PCRSWMD) on June 1, 1999. The petition for a CON was submitted to the PCRSWMD in August 1999. The PCRSWMD held a public hearing and passed a resolution granting the CON to Two Pine Landfill on November 23, 1999 satisfying the requirements of 22.205.

Comment 5 addresses the increase in noise pollution.

Response to Comment 5:

ADEQ has no authority to regulate noise. Nuisance conditions associated with noise is generally regulated by local ordinance through local law enforcement agencies. No changes were made to the final permit.

Comment 6 addresses the wetlands area and the possibility of flooding from Bayou Meto.

Response to Comment 6:

To the extent required under Section 404 of the Clean Water Act or applicable State wetlands laws, steps shall be taken to attempt to achieve no net loss of wetlands by first avoiding impacts to wetlands to the maximum extent practicable as required by paragraph (a)(1) of Regulation 22.404, then minimizing unavoidable impacts to the maximum extent practicable, and finally offsetting remaining unavoidable wetland impacts through all appropriate and practicable compensatory mitigation actions such as restoration of existing degraded wetlands or creation of man-made wetlands.

The Two Pine Landfill will be constructing 43 acres of wetlands as required by the U.S. Army Corps of Engineers Permit PBH-200000260. As part of this construction, the landfill will be excavating a stormwater or floodwater storage area that will hold approximately 50 million gallons.

The Two Pine Landfill is also constructing a Flood Relief Channel to contain flood waters. The relief channel will be excavated to store over 30 million gallons of floodwater. The Flood Relief Channel is permitted in accordance with the Federal Emergency Management Agency (FEMA). In February 2005 the Two Pine Landfill submitted a request for Conditional Letter of Map Revision (CLOMR) to FEMA. The request included the placement of fill, the landfill expansion area construction and the channelization project to Bayou Meto. According to Reg. 22.403(a), Class 1 landfill expansions cannot be located within a 100-year floodplain unless it can be demonstrated that the facility will not restrict flow of the base flood, the facility would not reduce the temporary water storage capacity of the floodplain, or a 100-year flood would not result in washout of solid waste as to pose a hazard to human health and the environment. On April 17, 2006, FEMA issued a letter (Case No.: 05-06-A035R) to the City of Jacksonville and Pulaski County stating the proposed landfill expansion meets the minimum floodplain management criteria of the National Flood Insurance Program (NFIP) and revisions to the Flood Boundary and Floodway Map (FBFM) would be necessary. Based on this CLOMR from FEMA, the proposed landfill expansion area will not be located within the 100-year floodplain.

The Two Pine Landfill is also required to construct stormwater sedimentation basins and monitor the stormwater discharge from the site in accordance with their General NPDES Stormwater Permit ARG160000 issued by ADEQ.

No changes were made to the final permit.

Comment 7 addresses the location of the landfill.

Response to Comment 7:

This comment has been addressed in Responses 3 and 4. No changes were made to the final permit.

PERMIT
FOR THE CONSTRUCTION AND OPERATION OF A SOLID WASTE DISPOSAL FACILITY

ISSUED BY

STATE OF ARKANSAS
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOLID WASTE MANAGEMENT DIVISION

Class 1 Landfill

Permit Number	**0163-S1-R3**
AFIN	**60-00438**
Effective Date	April 21, 2008
Permit Owner & Address	WM Two Pine Landfill, LLC 100 Two Pine Road North Little Rock, AR 72117
Facility Site Name & Address	Two Pine Landfill 100 Two Pine Road North Little Rock, Pulaski County, AR 72117
Location	At the junction of the North Belt Freeway (Highway 440 with Highway 67-167, between Highway 67-167 and the Union Pacific RR. and between the City of Sherwood and the City of Jacksonville.
Permitted Landfill Area	239.5± Acres
Property Area	530± Acres
Financial Assurance	$6,170,580.00
Design Engineer/Consultant	Terracon Consultants, Inc. 25809 I-30, Bryant, AR 72022 and Riley Park Hayden/RPH Engineers 3005 Breckenridge Boulevard Duluth, GA 30096

This permit authorizes the operation of the solid waste disposal facility as set forth in the permit application prepared by Waste Management Two Pine Landfill, LLC, hereinafter called "owner" or "permittee," and received by the Department of Environmental Quality on August 24, 2006. The application was completed through a series of documents furnished by the applicant as referenced within this document. This permit is issued pursuant to the provisions of the Arkansas Solid Waste Management Act (Arkansas Code Annotated 8-6-201 et seq.) as amended, hereinafter called the "Act"; Regulation Number 22, Arkansas Solid Waste Management Code, as adopted by the Pollution Control and Ecology Commission, hereinafter called Regulation 22; and all other applicable rules and regulations of the Department of Environmental Quality, hereinafter called "Department", and the following terms and conditions:

DESCRIPTION OF THIS PERMIT ACTION

This modification is for the lateral expansion of the Two Pine Class 1 Landfill. On the effective date, this permit supersedes all prior solid waste permits issued by the Department for this Class 1 Permit.

PERMIT CONDITIONS

1. This permit is for an approximately 239.5± acre waste disposal site as indicated on the approved plans. The final grades and elevations shall not be exceeded at any time or in the anticipation of settlement and consolidation of the waste mass. This permit shall expire when the authorized fill elevations have been attained and the facility is closed out in accordance with the provisions of Regulation 22, whichever occurs first.

    a. The Department shall be notified in writing upon construction of each disposal unit and upon facility closure in order that it may be inspected.

    b. Changes to or deviations from the construction/layout and operation of the facility, as indicated on the approved facility plans indicated below, and on the approved permit application documentation, are not authorized unless approved in writing by the Department.

    c. The approved application document is filed under the Document Identification Number 36562. Exceptions to 36562 are approved as referenced below.

2. The initial total amount of financial assurance is $6,170,580.00. Of this amount $3,859,725.00 dollars will be required for closure costs $2,310,855.00 will be required for the post-closure costs. This amount shall be subject to annual adjustments and may be increased at the discretion of the Department based upon the estimated cost for a third party to close the largest area requiring final cover during the active life of the facility and the cost for a third party to perform post closure care.

    a. The instruments used must be in one of the forms set forth in Regulation 22 or as otherwise approved by the Department.

    b. Operations allowed under this permit shall not commence until all financial assurance is satisfactorily filed with the Department.

    c. A portion or all of the financial assurance may be held by the Department beyond the time of cessation of disposal operations at the site to ensure satisfactory closure and post closure care in accordance with Regulation 22.

    d. No more than 50 acres of active disposal area shall be open in the new landfill expansion area. This requirement shall be addressed each year in the facility Annual Engineering and Inspection Report.

3. This permit is for the disposal of all waste eligible for a Class 1 sanitary landfill waste including all “special materials” as outlined in Regulation 22.701-708. Special Materials as identified in Regulation 22 do not require written authorization from the Department, provided the materials not specifically identified by the Special Materials section must be characterized by the generator of the waste prior to acceptance for disposal in the landfill in accordance with the facility written hazardous waste exclusion program.

4. Each landfill waste cell shall be constructed in the sequence indicated in the approved plans and specifications. See Condition 17 for approved plans.

5. The bottom liner system for any newly constructed waste cell must consist of a minimum 60 mil HPDE flexible membrane liner and a minimum of twenty-four inches of compacted clay exhibiting a maximum hydraulic conductivity of 1×10^{-7} centimeters per second (cm/s). In areas designated by "Composite High Potentiometric/Piezometric Surface vs. Liner Isopach," DIN 51148, 3' engineered buffer shall also be constructed additional to the bottom liner with a maximum hydraulic conductivity of 6×10^{-7} centimeters per second (cm/s) and in accordance with the approved design.

   a. Proper construction of the bottom clay liner of each waste cell shall be observed and certified to the Department by a Registered Professional Engineer in a Construction Certification Report in accordance with the approved CQA Plan whenever a cell is prepared for use.

   b. The Construction Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation, and extent of area(s) actually constructed for use; and test locations.

   c. The Certification Report shall be submitted to the Department at least fourteen (14) days prior to waste placement in that cell.

6. The permittee shall implement the Hazardous Waste Exclusion Plan presented in Solid Waste Management Division Document Identifier (DIN) 51046. In addition to the implementation of the approved Hazardous Waste Exclusion Plan, the facility shall fully meet all requirements of Reg.22.412 regarding the exclusion of all unauthorized waste streams.

7. The permittee shall implement the Landfill Gas Monitoring Plan presented in Solid Waste Management Division DIN 36562. In addition to the implementation of the approved Landfill Gas Monitoring Plan, the facility shall fully meet the requirements of Reg.22.415 regarding the control of explosive gases. The facility shall monitor each of the gas monitoring probes detailed in the approved Landfill Gas Monitoring Plan and within all structures at the facility on a quarterly basis. The results shall be submitted to the Department within 14 days of each monitoring event.

8. The permittee shall implement the requirements detailed in the Operating Plan and Narrative presented in Solid Waste Management Division DIN 51046. In addition to the implementation of the approved Operating Plan and Narrative, the facility shall fully meet the requirements of Regulation 22.

9. The permittee shall implement the Construction Quality Assurance Plan presented in Solid Waste Management Division Document Identifier 51148. In addition to the implementation of the approved Construction Quality Assurance Plan, the facility shall fully meet all requirements of Reg.22.428. The facility shall be required to submit construction plans and specifications to the Department prior to each construction event at the facility.

10. The permittee shall implement the Closure and Post Closure Plan presented in Solid Waste Management Division DIN 51046. In addition to the implementation of the approved Closure and Post Closure Care Plan, the facility shall fully meet all requirements of Reg.22.1301 and Reg.22.1302. The post closure maintenance period for this facility shall be a minimum of 30 (thirty) years starting on the date the Department accept closure of the facility. The length of the post closure period may be decreased or increased by the Director in accordance with Regulation 22.1302(c) (4). Closure Certification Reports for final cover construction shall be

submitted to the Department in accordance with regulation 22.1301 and in accordance with the approved closure plan.

11. Leachate collection removal and leachate storage systems shall be monitored and operated such that free flowing conditions are maintained in the leachate collection system. Leachate which is disposed in publicly owned treatment works (POTW) must comply with 40 CFR Part 403 (U.S. EPA Pretreatment regulations). Leachate shall otherwise be managed in accordance with the Leachate Management Plan found in Solid Waste Management Division DIN 51046.

12. At all times the disposal facility shall be maintained in good condition and operations shall be conducted by licensed, qualified on-site operator holding the appropriate license as required by Regulation Number 27, Certification of Sanitary Landfill Operators. Copies of the approved operating narrative, approved permit plans/specifications, operator licenses, stormwater pollution prevention plan (SWPPP), NPDES construction and/or stormwater permit(s) for the facility, and this disposal permit shall be maintained at the site for reference.

13. This permit may be revoked or modified whenever, in the opinion of the Department, the facilities are no longer in compliance with the Act, Regulation 22 and the applicable rules and regulations. This permit shall not relieve the permittee, its agents or employees from compliance with all provisions of the Act and Regulation 22.

14. The Department may issue modifications or amendments to this permit governing the design, operation, maintenance, closure or post-closure of the facility during the term of this permit. Such modifications or amendments shall be attached to this permit and shall be fully maintained and enforceable as a condition or conditions of this permit.

15. This permit is issued in reliance upon the statements and representations made in the application, operating narrative, the plans, specifications and related documents and the Department has no responsibility for the adequacy or proper functioning of the disposal facility. Nothing herein contained shall be construed as releasing the permittee form any liability from damage to persons or property by reason of the installation, maintenance operation of the disposal facility.

16. The Department, its employees, agents, or any authorized person shall have the right to enter the property at any time for any reason as set out in Regulation 22 for the purposes of, including but not limited to taking samples, reviewing the operating record, inspecting the facility and performing other enforcement or engineering action without interference or delay from the permittee.

17. The approved permit plans for the facility are as follows:

Landfill Cell Development Plan	Sheet 3 of 26 Doc. ID# 36562
Final Development Plan	Sheet 4 of 26, Doc. ID# 36562
Subgrade Development Plan 1	Sheet 6 of 26, Doc. ID# 36562
Subgrade Development Plan 2	Sheet 7 of 26, Doc. ID# 36562
Top of Clay Liner Development Plan 1	Revised Sheet 8, Doc. ID# 51046
Top of Clay Liner Development Plan 2	Revised Sheet 9, Doc. ID# 51046
Final Cover Plan	Revised Sheet 12, Doc. ID# 51046

	Document ID Number 10509
Final Cover Plan 2	Revised Sheet 13, Doc. ID# 51046
Stormwater Plan 1	Sheet 14 of 26,Doc. ID# 36562
Stormwater Plan 2	Sheet 15 of 26, Doc. ID# 36562
Gas Management Plan	Sheet 16 of 26, Doc. ID# 36562 Document ID Number 10509
Leachate System Details	Sheet 22 of 26, Doc ID# 36562
Leachate System Details 2	Revised Sheet 23, Document ID# 51046
Cross Section A-A' through Cross Section I-I' & Composite High Potentiometric/ Piezometric Surface vs. Liner Isopach	Sheets 1 through 6 & Sheet 1 of 1, Doc ID# 51148
Landscaping Plan & Visual Screening Berm	Doc. ID# 52331

18. An initial permit fee has been received by the Department. Annual fees due thereafter shall be assessed in accordance with Regulation Number 9, Fee System for Environmental Permits. Failure to pay annual fees when due may result in revocation of this permit.

19. Any change in ownership or control of the operation of this landfill may be considered a permit modification and shall be fully disclosed to the Department. For purposes of this permit, ownership or control shall be determined by a change in the debt or equity of the permittee of five percent (5%) or more. Notwithstanding the above, the permittee is not required to disclose a change in ownership or control of the facility if the change is among the persons and/or entities previously disclosed to the Department in Section E of the Disclosure Statement or similar disclosure.

20. Disposal of bulk liquid waste in the landfill is prohibited. "Liquid waste" is waste which contains "free liquids" as defined by Methods 9095 (Paint Filter Test) as described in EPA Publication No. SW-846. Liquid wastes are permitted to be managed and disposed in accordance with the Liquid Waste Management Plan located in Solid Waste Management Division DIN 36562.

21. Measures to control and prevent storm water run-on from running through or into the active disposal area shall be constructed and maintained. Grading, dikes, diversion ditches, silt fencing, silt, traps, and other best management practices (BMP) for storm water control shall be provided as necessary to control/prevent off-site sediment accumulation from landfill related operations.

22. Appropriate NPDES construction/storm water permit(s) shall be obtained for storm water discharges from the landfill site and borrow sites. A Storm Water Pollution Prevention Plan (SWPPP), which outlines erosion and sediment control measures, shall be prepared and implemented in accordance with applicable NPDES requirements. A copy of the SWPPP shall be maintained on-site for reference by operating staff.

23. The permittee shall comply with the air criteria requirements of Regulation 22.416. Those requirements include meeting the State Implementation Plan (SIP) pursuant to Section 110 of the Clean Air Act; prohibiting open burning of solid waste, unless authorized by the Department; and establishing fire safety procedures.

24. Litter control fences shall be provided in the active fill area for the control of blowing litter. Other litter control measures shall be implemented, if necessary, to confine litter to the smallest practicable extent and prevent litter from leaving the site.

25. The permittee must cover disposed waste with at least six inches of soil at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging. No portion of the waste is to be left exposed at the end of the operating day. Alternative materials for daily cover, such as synthetic materials, shall only be used when specifically authorized in writing by the Department. Any alternative daily cover that is proposed by the permittee must comply with Department guidelines and include specific written operating procedures that will be implemented to control disease vectors, fires, odors, blowing litter, and scavenging. The use of synthetic material will not be authorized unless it is incorporated within operating procedures that also rely on use of at least six inches of soil cover for daily cover on some days; any proposal for daily cover based solely upon full-time use of synthetic material will not be approved.

26. The final grades and elevations shown on the plans shall not be exceeded at any time or in anticipation of settlement and consolidation of the waste mass.

    a. Timely initiation and completion of closure of landfill cells or units shall be made in accordance with Regulation 22.1301(f) and (g).

    b. Proper construction of the final cover system shall be observed and certified in writing to the Department by a Registered Professional Engineer in a Construction Certification Report in accordance with the approved CQA Plan whenever a cell, area or phase of the landfill is closed-out.

    c. The Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation and extent of closed area(s); and test locations.

27. This permit authorizes one (1) active disposal area at the facility per Section 22.411 (c) of Regulation 22. Multiple working faces shall not be utilized at the facility unless the permittee can provide adequate justification for more than one working face and specific authorization for such is granted in writing by the Department. It is not anticipated that such authorization will be granted except on a temporary basis for highly unusual or emergency situations.

28. The Department's decision to issue this permit is final for purposes of appeal as of the date indicated in the Certificate of Service below. If any provision of these conditions or the application of these conditions thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of these conditions that can be given effect without the invalid provision or application. Therefore, to this end, the provisions of these conditions are declared to be severable.

29. The groundwater monitoring system will be monitored per the standard provisions of Regulation 22. A groundwater monitoring system shall be established and maintained at the facility that consists of a sufficient number of wells or sampling points, installed at appropriate locations and depths that will yield representative samples of groundwater quality. The monitoring system shall be installed operated and maintained in accordance with the approved design

specifications throughout the active life of the facility and throughout the post-closure care period.

30. The initial groundwater monitoring system for the WM Two Pine Class 1 landfill consists of 23 monitoring wells (MW-04A, MW-5N, MW-8R, MW-09R, MW-10A, MW-10B, MW-12, MW-14B, MW-15, MW-19, RMW-06R, nested wells: MW-20S, MW-21S, MW-22S, MW-23S, MW-24S, MW-25S, MW-20D, MW-21D, MW-22D, MW-23D, MW-24D and MW-25D) as shown on the Revised Figure 2 (DIN 51276) of the approved Sampling and Analysis Plan (DIN 51202). All new and existing monitoring wells will be considered as one monitoring well system. Any modification of the groundwater monitoring system will follow the provisions of Regulation 22.

31. Nested monitoring wells (MW-21S, MW-21D, MW-22S, MW-22D, MW-23S and MW-23D) will be replaced as landfill operations proceed northward toward the nested wells installed within the expansion area footprint and prior to the construction of Cells 10 and 11. Any decommission or replacement monitoring wells will follow all the provisions as stated in Regulation 22.1103 and will require SWMD approval.

APPROVED BY: **Arkansas Department of Environmental Quality**
5301 Northshore Drive
North Little Rock, Arkansas 72218

For Teresa Marks

4-21-2008
Date

CERTIFICATE OF SERVICE

I, Barbara J. Mathews, hereby certify that a copy of this permit has been mailed by first-class mail to Mr. Wayne Mangum, 100 Two Pine Drive, North Little Rock, AR 72117, on or before this 21 day of April, 2008.

Permit Modification Application Summary and Rationale
Waste Management Two Pine Class 1 Landfill
Permit No. 0163-S1-R3; AFIN No. 60-00438

Permit Application Summary

This summary form consists of information submitted during the permitting process. It represents basic information from the administrative record utilized in forming recommendations from the Solid Waste Management Division. The entire file for the solid waste permit application specified below should be reviewed for complete details on the proposed facility.

Permit Application Summary	
1. Name of Applicant:	WM Two Pine Landfill, LLC
2. Type of Facility:	Class 1 landfill
3. Engineering Firm:	Terracon Consultants, Inc. and Riley Park Hayden/RPH Engineers
4. Application Date:	Submitted on August 24, 2006
5. Site Location	General: The site is located at the junction of the North Belt Freeway (HIGHWAY 440 with Highway 67-167 and the Union Pacific Railroad and between the City of Sherwood and the City of Jacksonville. Specific: Located in the parts of Sections 35 and 36, T-3-N, R-11-W; and in part of Section 2, T-2-N, R-11-W, Pulaski County, Arkansas.
6. Permit Area:	Total Property Area: 530± acres Permitted Landfill Area: 239.5± acres
Residences Within 2 Miles:	More than 100 in Sherwood and Jacksonville, Arkansas
Water Supplies Within 1/2 Mile:	Domestic water wells located within 0.5 mile of the expansion area were identified from the States' water well inventory files at the Arkansas Geological Commission. Three domestic water wells are located within one-half mile of either the current landfill boundary or from the proposed expansion area boundary. Two of these wells are located east of the site, while one is located north of the site across State Highway 67-167.
Wetlands:	Two types of wetlands were identified during wetland delineation activities: Riverine, intermittent, excavated streambed, seasonally flooded (Impacted Area 1). This area exhibits wetland conditions in a drainage channel that is approximately 0.2 acre and runs northwest between the current borrow area and the cultivated area at the site. Impacted Area 2 – palustrine, forested, broad-leaved deciduous, temporarily flooded is a narrow strip of woods that extends south from the Missouri-Pacific Railroad into the Proposed Borrow Area and comprises approximately 4.7 acres of wetland drainage. Additionally, impacted Area 2 includes approximately 9.21 acres of the western portion of bottomland hardwood forest that will adjoin the proposed landfill expansion area. The two wetland areas above will be impacted as a result of the proposed expansion. Wetland mitigation activities will take place to compensate for the loss of function and values of these impacted wetlands at the project site. The area proposed for wetland mitigation is approximately 43 acres of property

Permit Application Summary	
	previously cultivated for soybeans which will be restored to a bottomland hardwood forest.
Geology	The site is located within the Mississippi Embayment Physiographic Province in central Arkansas. Geology beneath the site consists of sediment and rock from the Quaternary, Tertiary and Paleozoic Systems. The exposed surficial stratum at the landfill is comprised of Quaternary-aged terrace deposits and alluvium which overlies a discontinuous Tertiary-aged Wilcox Group which stratigraphically overlies the Tertiary-aged Midway Group which rests unconformably above the Pennsylvanian-aged Atoka Formation. The lateral expansion area lies within the Arkansas River water basin in central Arkansas. This fluvial depositional environment has resulted in a complex nonuniform and highly variable surficial and shallow subsurface stratigraphy both vertically and horizontally. The Quaternary-aged alluvium is discontinuous and composed of silty clays, sand and clay zones. Buried stream deposits at the site are composed primarily of Plelstocene-aged alluvial and channel sediments deposited in point bar sequences. The alluvial deposits along Bayou Meto and the Arkansas River floodplains grade upward from coarse sand and gravels to fine silts and clays of overbank deposits.
Soils:	Regional soils located near the site consist of the Moreland silty clay, Rexor silt loam, Smithdale fine sandy loam, and the Amy silt loam (USDA, 2006). The Moreland series represents approximately 70 percent of the Two Pine Landfill site and is located in the southwestern two-thirds of the site with a small portion along the north bordering Bayou Meto while 20 percent is represented by the Rexor series located in the northeastern quarter. Less than 5 percent each is represented by the Smithdale and the Amy series. The Smithdale is located along the eastern boundary and the Amy silt loam is found in the extreme northeast corner along Bayou Meto.
Ground Water:	Regionally the primary potable source of groundwater in Pulaski County is the Quaternary-aged alluvial aquifer. At the Two Pine Landfill site, groundwater is generally first encountered within the Quaternary shallow fluvial deposits where present and when absent in the Pleistocene-aged unconsolidated stream and terrace deposits. The shallow, fluvial deposits may act as localized recharge zones for the transmission of groundwater to the Quaternary and other water bearing aquifers.
Surface Drainage Sequence:	Topographically the site is relatively flat with site drainage poor to fair. Bayou Meto, a stream located approximately 0.5 mile north/northeast of the Two Pine Landfill site, and its tributary, Five Mile Creek, drain the Two Pine property and adjacent areas. The Two Pine Landfill is located within the 100-year floodplain of Bayou Meto. The surface drainage of the landfill site has been augmented by a series of drainage ways that channel water to the northwest, discharging into Brushy Island Creek and eventually into Bayou Meto.
Waste Streams:	Class 1 Municipal Solid Waste as defined in Arkansas Regulation 22.
Capacity:	Total Capacity = 34,400,000 cubic yards
Disposal Rate	896,000 cubic yards per year (approximately may vary)
Projected Active Life after this modification	24 years (approximately, will vary with waste received)
Bottom Liner	60 mil HPDE flexible membrane liner and a minimum of twenty-four inches of

Permit Application Summary	
System:	compacted clay exhibiting a maximum hydraulic conductivity of 1 x 10^{-7} centimeters per second (cm/s).
Final Cover:	Alt. Cover 1: Consists of an intermediate soil cover, 18 inch clay liner with hydraulic conductivity of 1 x 10^{-7} centimeters per second (cm/s), 40 ml geomembrane, geocomposite drainage net, 12 inch final cover soil layer and 6 inch final cover soil layer capable of supporting vegetation. Alt. Cover 2: Consists of an intermediate soil cover, 12 inch clay liner with hydraulic conductivity of 1 x 10^{-6} centimeters per second (cm/s), 50 ml microspike HDPE drain liner, geotextile, 12 inch final cover soil layer and 6 inch final cover soil layer capable of supporting vegetation.

Permit Summary and Rationale

The following information was considered during the preparation of a draft permit for the proposed facility:

– Permit Pre-Application dated January 6, 2000.

– Permit Application dated August 24, 2006. The application was later completed through documents furnished on November 29, 2007 and December 21, 2007

– Correspondence from the Permittee; The Arkansas Solid Waste Management Code, as Amended (Regulation Number 22); and All other applicable rules and regulations of the Arkansas Department of Environmental Quality.

Condition No.	Permit Conditions
1	Concerns the expiration of the permit. The permit will expire when the facility is filled to permit capacity and closed out in accordance with Regulation 22 and the approved Closure Plan.
2	Specifies the initial amount of financial assurance. (Regulations 22.1402 and 22.1043).
3	Concerns the type of disposal material permitted for the Class 1 landfill including special materials outlined in Regulation 22.701-708.
4	Concerns the construction sequence of each waste cell as indicated by the approved plans and specifications.
5	This permit condition establishes the approved bottom liner system configuration of the landfill.
6	This permit condition identifies the approved Hazardous Waste Exclusion Plan for the facility as required by 22.412.
7	This permit condition details the approved Explosive Gas Monitoring System and Plan as required by 22.415.
8	This permit condition establishes the approved Operating Plan and Narrative as required by Regulation 22.
9	This condition establishes the approved CQA Plan for the facility and requires review of construction documents prior to al construction events.
10	This permit condition establishes the approved Closure and Post Closure Care Plan for the facility as required by Regulation 22.1301 and 22.1302.
11	Specifies the leachate collection removal and leachate storage systems shall be monitored and operated such that free flowing conditions are maintained.
12	Concerns requirements to maintain the disposal facility in good operating condition under licensed, qualified, on-site landfill operators in accordance with Section 22.411 of Regulation 22 and with Regulation 27.
13	Concerns the right of the Department to revoke or modify the permit in the event the facility is no longer in compliance with the Arkansas Solid Waste Management Act, Regulation 22, or other applicable regulations in accordance with Section 22.308 of Regulation 22
14	Concerns issuance of modifications to the permit by the Department is in accordance with Sections 22.308 and 22.422 of Regulation 22.

Condition No.	Permit Conditions
15	States the Department has no responsibility for the proper functioning of the disposal facility and the permittee is not exempt from liability to third parties per Regulation 8.
16	Concerns the right of Department employees to enter the permittee's property to inspect the facility at any time without interference or delay as in accordance with Section 22.1501 of Regulation 22.
17	This permit condition details the approved landfill plans for the facility. Any changes to the plans listed will require a modification to the facility permit.
18	Concerns the payment of annual fees associated with the permit in accordance with Regulation 9. Failure to pay the annual fee may result in revocation of the permit.
19	Concerns permit transfer and disclosure is in accordance with Act 454 of 1991.
20	This condition restricts the disposal of bulk liquid waste at the facility.
21	Concerns the measures to control and prevent storm water run-on through or into the active disposal area.
22	Specifies the requirements for appropriate NPDES permit(s) and Storm Water Pollution Prevention Plan is in accordance with Sections 22.418, 22.419 and 22.427 of Regulation 22 and the Clean Water Act.
23	Concerns complying with the air criteria requirements of Regulation 22.416 including the requirements of the State Implementation Plan of the Clean Air Act. Also, prohibiting the open burning of solid waste and establishing fire safety procedures.
24	This permit condition requires the use of litter control fences or other litter control measures to be implemented for the control of blowing litter.
25	Specifies the requirement for daily or more frequent cover to prevent vectors, odors, fire, litter and scavenging. Alternative daily cover must comply with Department guidelines and include specific written operating procedures.
26	Specifies the final grades and elevations shown on the plans shall not be exceeded at any time. Requirements for a timely closure, proper construction of the final cover system and Certification Report in accordance with 22.1301.
27	This permit condition authorizes one (1) active disposal area. Authorization for a second working face may be granted provided adequate justification.
28	Concerns providing notice for the purpose of appeal of the final permit in accordance with Section 22.306 of Regulation 22 and in accordance with Regulation 8. Provisions regarding severability are in accordance with Section 22.1601 of Regulation 22.
29	This permit condition specifies that the groundwater monitoring system at the facility will be established, maintained, and monitored per the standard provisions of Regulation 22.
30	Specifies that the groundwater monitoring system for the landfill will include all new and preexisting monitoring wells and will be considered as one monitoring well system. Any modifications to the monitoring well system will be in accordance with Regulation 22.

Condition No.	Permit Conditions
31	Concerns specific monitoring wells that will be decommissioned and replaced due to landfill construction sequence of specific waste cells. Specifies that any decommission or replacement monitoring wells will be in accordance with Regulation 22.

This document was reviewed by Maria Matoska, Permit Engineer, Bryan Leamons, Engineer Supervisor and Kay McQueen, Geologist

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ADEQ

A R K A N S A S
Department of Environmental Quality

February 3, 2011

Two Pine Class 1 Landfill
Attn: Ms. Lisa Rotenberry
100 Two Pine Drive
North Little Rock, AR 72117

RE: Approval for Minor Permit Modification and Transmittal of Permit Addendum
Two Pine Class 1 Landfill
Permit Number: 0163-S1-R3 **AFIN: 60-00438**
Document Number: 58965 **Cross Reference Number: 58560**

Dear Ms. Rotenberry:

ADEQ Solid Waste Management Division staff has received and reviewed a minor permit modification application associated with the construction of a leachate force main. The minor modification was for the purpose of improving leachate management. Leachate will be conveyed from the leachate storage tanks via an on-site leachate force main located at the east side of the site to an off-site wastewater transmission line. The SWMD hereby approves the minor permit modification and transmits the attached permit addendum, permit application summary and revised permit rationale. The revised permit rationale provides the basis for new permit condition 17a.

This authorization is given in reliance upon the statements and representations made to the Department, and the Department has no responsibility for ultimate proper functioning of the disposal facility. The Department also reserves the right to request additional information if deemed necessary. This approval shall not remove any liability nor hold the Two Pine Class 1 Landfill harmless in the event of any adverse environmental or public health conditions resulting from this authorization. The Two Pine Class 1 Landfill shall be solely and fully responsible for implementing any corrective action necessary to remediate any adverse condition at the site based on this authorization.

Please call me at 682-0601 should you have any questions regarding the above information.

Sincerely,

Karen Bassett, Chief Deputy Director ADEQ

cc: Heidi Love, Inspector Supervisor SWMD
Jeff Shepherd, Shepherd Engineering & Design Company, Inc.
David Conrad, Waste Management

ADDENDUM TO PERMIT

STATE OF ARKANSAS

DEPARTMENT OF ENVIRONMENTAL QUALITY

SOLID WASTE MANAGEMENT DIVISION

Landfill Name	**AFIN:**	**60-00438**
Two Pine Class 1 Landfill	**Permit No:**	**0163-S1-R3**

Application reference	**Description of Addendum to Permit**
November 15, 2010 Document # 58560	Updated Operating Plan to include the provisions for disposing of leachate through an on-site leachate forcemain connected to an off-site wastewater treatment line. Updated Facility Design Plan to include an on-site leachate forcemain to convey leachate from the leachate storage tanks to an off-site wastewater transmission line.
Additional Permit Conditions	
Condition #17a.	The approved plans for the leachate forcemain for the facility are as follows: Drawings 1 through 5 of Document # 57560. (Shepherd Engineering and Design Co., Inc.) Drawing 1 Leachate Forcemain Plan Profile and Details-Crist Engineers (Document #57560)

APPROVED BY: Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317.

For Teresa Marks, Director

3 Feb 11
Date

CERTIFICATE OF SERVICE

I hereby certify that a copy of the aforementioned permit has been mailed by first-class mail to Ms. Lisa Rotenberry, 100 Two Pine Drive, North Little Rock, AR 72117.

Certified by Barbara J. Mathews on or before this 3rd day of February, 2014.

Permit Modification Application Summary and Rationale
Waste Management Two Pine Class 1 Landfill
Permit No. 0163-S1-R3; AFIN No. 60-00438

Permit Application Summary

This summary form consists of information submitted during the permitting process. It represents basic information from the administrative record utilized in forming recommendations from the Solid Waste Management Division. The entire file for the solid waste permit application specified below should be reviewed for complete details on the proposed facility.

Permit Application Summary	
1. Name of Applicant:	WM Two Pine Landfill, LLC
2. Type of Facility:	Class 1 landfill
3. Engineering Firm:	Terracon Consultants, Inc. and Riley Park Hayden/RPH Engineers
4. Application Date:	Submitted on August 24, 2006
5. Site Location	General: The site is located at the junction of the North Belt Freeway (HIGHWAY 440 with Highway 67-167 and the Union Pacific Railroad and between the City of Sherwood and the City of Jacksonville. Specific: Located in the parts of Sections 35 and 36, T-3-N, R-11-W; and in part of Section 2, T-2-N, R-11-W, Pulaski County, Arkansas.
6. Permit Area:	Total Property Area: 530± acres Permitted Landfill Area: 239.5± acres
Residences Within 2 Miles:	More than 100 in Sherwood and Jacksonville, Arkansas
Water Supplies Within 1/2 Mile:	Domestic water wells located within 0.5 mile of the expansion area were identified from the States' water well inventory files at the Arkansas Geological Commission. Three domestic water wells are located within one-half mile of either the current landfill boundary or from the proposed expansion area boundary. Two of these wells are located east of the site, while one is located north of the site across State Highway 67-167.
Wetlands:	Two types of wetlands were identified during wetland delineation activities: Riverine, intermittent, excavated streambed, seasonally flooded (Impacted Area 1). This area exhibits wetland conditions in a drainage channel that is approximately 0.2 acre and runs northwest between the current borrow area and the cultivated area at the site. Impacted Area 2 – palustrine, forested, broad-leaved deciduous, temporarily flooded is a narrow strip of woods that extends south from the Missouri-Pacific Railroad into the Proposed Borrow Area and comprises approximately 4.7 acres of wetland drainage. Additionally, impacted Area 2 includes approximately 9.21 acres of the western portion of bottomland hardwood forest that will adjoin the proposed landfill expansion area. The two wetland areas above will be impacted as a result of the proposed expansion. Wetland mitigation activities will take place to compensate for the

Permit Application Summary	
	loss of function and values of these impacted wetlands at the project site. The area proposed for wetland mitigation is approximately 43 acres of property previously cultivated for soybeans which will be restored to a bottomland hardwood forest.
Geology	The site is located within the Mississippi Embayment Physiographic Province in central Arkansas. Geology beneath the site consists of sediment and rock from the Quaternary, Tertiary and Paleozoic Systems. The exposed surficial stratum at the landfill is comprised of Quaternary-aged terrace deposits and alluvium which overlies a discontinuous Tertiary-aged Wilcox Group which stratigraphically overlies the Tertiary-aged Midway Group which rests unconformably above the Pennsylvanian-aged Atoka Formation. The lateral expansion area lies within the Arkansas River water basin in central Arkansas. This fluvial depositional environment has resulted in a complex nonuniform and highly variable surficial and shallow subsurface stratigraphy both vertically and horizontally. The Quaternary-aged alluvium is discontinuous and composed of silty clays, sand and clay zones. Buried stream deposits at the site are composed primarily of Plelstocene-aged alluvial and channel sediments deposited in point bar sequences. The alluvial deposits along Bayou Meto and the Arkansas River floodplains grade upward from coarse sand and gravels to fine silts and clays of overbank deposits.
Soils:	Regional soils located near the site consist of the Moreland silty clay, Rexor silt loam, Smithdale fine sandy loam, and the Amy silt loam (USDA, 2006). The Moreland series represents approximately 70 percent of the Two Pine Landfill site and is located in the southwestern two-thirds of the site with a small portion along the north bordering Bayou Meto while 20 percent is represented by the Rexor series located in the northeastern quarter. Less than 5 percent each is represented by the Smithdale and the Amy series. The Smithdale is located along the eastern boundary and the Amy silt loam is found in the extreme northeast corner along Bayou Meto.
Ground Water:	Regionally the primary potable source of groundwater in Pulaski County is the Quaternary-aged alluvial aquifer. At the Two Pine Landfill site, groundwater is generally first encountered within the Quaternary shallow fluvial deposits where present and when absent in the Pleistocene-aged unconsolidated stream and terrace deposits. The shallow, fluvial deposits may act as localized recharge zones for the transmission of groundwater to the Quaternary and other water bearing aquifers.
Surface Drainage Sequence:	Topographically the site is relatively flat with site drainage poor to fair. Bayou Meto, a stream located approximately 0.5 mile north/northeast of the Two Pine Landfill site, and its tributary, Five Mile Creek, drain the Two Pine property and adjacent areas. The Two Pine Landfill is located within the 100-year floodplain of Bayou Meto. The surface drainage of the landfill site has been augmented by a series of drainage ways that channel water to the northwest, discharging into Brushy Island Creek and eventually into Bayou Meto.
Waste Streams:	Class 1 Municipal Solid Waste as defined in Arkansas Regulation 22.

Permit Application Summary	
Capacity:	Total Capacity = 34,400,000 cubic yards
Disposal Rate	896,000 cubic yards per year (approximately may vary)
Projected Active Life after this modification	24 years (approximately, will vary with waste received)
Bottom Liner System:	60 mil HPDE flexible membrane liner and a minimum of twenty-four inches of compacted clay exhibiting a maximum hydraulic conductivity of 1×10^{-7} centimeters per second (cm/s).
Final Cover:	Alt. Cover 1: Consists of an intermediate soil cover, 18 inch clay liner with hydraulic conductivity of 1×10^{-7} centimeters per second (cm/s), 40 ml geomembrane, geocomposite drainage net, 12 inch final cover soil layer and 6 inch final cover soil layer capable of supporting vegetation. Alt. Cover 2: Consists of an intermediate soil cover, 12 inch clay liner with hydraulic conductivity of 1×10^{-6} centimeters per second (cm/s), 50 ml microspike HDPE drain liner, geotextile, 12 inch final cover soil layer and 6 inch final cover soil layer capable of supporting vegetation.

Permit Summary and Rationale

The following information was considered during the preparation of a draft permit for the proposed facility:

- Permit Pre-Application dated January 6, 2000.
- Permit Application dated August 24, 2006. The application was later completed through documents furnished on November 29, 2007 and December 21, 2007
- Correspondence from the Permittee; The Arkansas Solid Waste Management Code, as Amended (Regulation Number 22); and All other applicable rules and regulations of the Arkansas Department of Environmental Quality.

Condition No.	Permit Conditions
1	Concerns the expiration of the permit. The permit will expire when the facility is filled to permit capacity and closed out in accordance with Regulation 22 and the approved Closure Plan.
2	Specifies the initial amount of financial assurance. (Regulations 22.1402 and 22.1043).
3	Concerns the type of disposal material permitted for the Class 1 landfill including special materials outlined in Regulation 22.701-708.
4	Concerns the construction sequence of each waste cell as indicated by the approved plans and specifications.
5	This permit condition establishes the approved bottom liner system configuration of the landfill.
6	This permit condition identifies the approved Hazardous Waste Exclusion Plan for the facility as required by 22.412.
7	This permit condition details the approved Explosive Gas Monitoring System and Plan as required by 22.415.
8	This permit condition establishes the approved Operating Plan and Narrative as required by Regulation 22.
9	This condition establishes the approved CQA Plan for the facility and requires review of construction documents prior to al construction events.
10	This permit condition establishes the approved Closure and Post Closure Care Plan for the facility as required by Regulation 22.1301 and 22.1302.
11	Specifies the leachate collection removal and leachate storage systems shall be monitored and operated such that free flowing conditions are maintained.

Condition No.	Permit Conditions
12	Concerns requirements to maintain the disposal facility in good operating condition under licensed, qualified, on-site landfill operators in accordance with Section 22.411 of Regulation 22 and with Regulation 27.
13	Concerns the right of the Department to revoke or modify the permit in the event the facility is no longer in compliance with the Arkansas Solid Waste Management Act, Regulation 22, or other applicable regulations in accordance with Section 22.308 of Regulation 22
14	Concerns issuance of modifications to the permit by the Department is in accordance with Sections 22.308 and 22.422 of Regulation 22.
15	States the Department has no responsibility for the proper functioning of the disposal facility and the permittee is not exempt from liability to third parties per Regulation 8.
16	Concerns the right of Department employees to enter the permittee's property to inspect the facility at any time without interference or delay as in accordance with Section 22.1501 of Regulation 22.
17	This permit condition details the approved landfill plans for the facility. Any changes to the plans listed will require a modification to the facility permit.
17a	This permit condition details the approved plan and design for the leachate forcemain. Any changes to the plans listed will require a modification to the facility permit.
18	Concerns the payment of annual fees associated with the permit in accordance with Regulation 9. Failure to pay the annual fee may result in revocation of the permit.
19	Concerns permit transfer and disclosure is in accordance with Act 454 of 1991.
20	This condition restricts the disposal of bulk liquid waste at the facility.
21	Concerns the measures to control and prevent storm water run-on through or into the active disposal area.
22	Specifies the requirements for appropriate NPDES permit(s) and Storm Water Pollution Prevention Plan is in accordance with Sections 22.418, 22.419 and 22.427 of Regulation 22 and the Clean Water Act.
23	Concerns complying with the air criteria requirements of Regulation 22.416 including the requirements of the State Implementation Plan of the Clean Air Act. Also, prohibiting the open burning of solid waste and establishing fire safety procedures.
24	This permit condition requires the use of litter control fences or other litter control measures to be implemented for the control of blowing litter.

Condition No.	Permit Conditions
25	Specifies the requirement for daily or more frequent cover to prevent vectors, odors, fire, litter and scavenging. Alternative daily cover must comply with Department guidelines and include specific written operating procedures.
26	Specifies the final grades and elevations shown on the plans shall not be exceeded at any time. Requirements for a timely closure, proper construction of the final cover system and Certification Report in accordance with 22.1301.
27	This permit condition authorizes one (1) active disposal area. Authorization for a second working face may be granted provided adequate justification.
28	Concerns providing notice for the purpose of appeal of the final permit in accordance with Section 22.306 of Regulation 22 and in accordance with Regulation 8. Provisions regarding severability are in accordance with Section 22.1601 of Regulation 22.
29	This permit condition specifies that the groundwater monitoring system at the facility will be established, maintained, and monitored per the standard provisions of Regulation 22.
30	Specifies that the groundwater monitoring system for the landfill will include all new and preexisting monitoring wells and will be considered as one monitoring well system. Any modifications to the monitoring well system will be in accordance with Regulation 22.
31	Concerns specific monitoring wells that will be decommissioned and replaced due to landfill construction sequence of specific waste cells. Specifies that any decommission or replacement monitoring wells will be in accordance with Regulation 22.

This document was reviewed by Maria Matoska, Permit Engineer, Bryan Leamons, Engineer Supervisor and Kay McQueen, Geologist

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ADEQ

ARKANSAS
Department of Environmental Quality

October 17, 2012

Waste Management Two Pine Class 1 Landfill
Attn: Mr. David Conrad
100 Two Pine Drive
North Little Rock, AR 72117

RE: Approval for Minor Permit Modification and Transmittal of Permit Addendum
Waste Management Two Pine Class 1 Landfill
Permit Number: 0163-S1-R3 **AFIN: 60-00438**
Document Number: 63291 **Cross Reference Numbers: 62035, 62800 and 63188**

Dear Mr. Conrad:

ADEQ Solid Waste Management Division staff has received and reviewed a minor permit modification application associated with the liner and leachate collection system design alternatives resulting in a 0.5 foot thickness reduction in the protective layer. The modification also includes the addition of chimney drains in the protective soil cover. The minor modification is for the purpose of improving leachate management and providing design alternatives for the liner and leachate collection system for the remainder of cells in the LEA. The SWMD hereby approves the minor permit modification and transmits the attached permit addendum.

This authorization is given in reliance upon the statements and representations made to the Department, and the Department has no responsibility for ultimate proper functioning of the disposal facility. The Department also reserves the right to request additional information if deemed necessary. This approval shall not remove any liability nor hold the Two Pine Class 1 Landfill harmless in the event of any adverse environmental or public health conditions resulting from this authorization. Two Pine Class 1 Landfill shall be solely and fully responsible for implementing any corrective action necessary to remediate any adverse condition at the site based on this authorization.

Please call me at 682-0601 should you have any questions regarding the above information.

Sincerely,

Karen Bassett

Karen Bassett, Acting Chief SWMD

cc: Charles Stringer, District Field Inspector SWMD
Jeff Shepherd, SEDCO

ADDENDUM TO PERMIT

STATE OF ARKANSAS

DEPARTMENT OF ENVIRONMENTAL QUALITY

SOLID WASTE MANAGEMENT DIVISION

Landfill Name	AFIN:	60-00438
Waste Management Two Pine Class 1 Landfill	Permit No:	0163-S1-R3

Application reference (Date/doc ID)	Description of Addendum to Permit
March 26, 2012 Document # 62035	Permit Modification Application Forms
July 17, 2012 Document # 62800 September 25, 2012 Document # 63188	This minor permit modification provides for additional liner and leachate collection system alternatives by reducing the protective cover layer by 0.5 feet. This modification also includes the installation of chimney drains in the protective soil cover to improve leachate collection performance. The protective soil layer for the chimney drains shall consist of sand as specified in the approved ADEQ document #63188. The following drawings replace drawings previously approved in ADEQ document #52354 Condition 17. Drawing 6 of 10 Top of Protective Cover Document #63188 Drawing 7 of10 Final Grades Document #63188 Drawing 8 of 10 Leachate Collection Design Sand Chimney Drains Document #63188 Drawing 9of 10 Leachate Collection Design with Chimney Drains Document #63188 Drawing 10 of 10 Chimney Drain Details Document #63188

APPROVED BY: Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR
72118-5317.

Karen Barrett

For Teresa Marks, Director

10/17/12

Date

CERTIFICATE OF SERVICE

I hereby certify that a copy of the aforementioned permit has been mailed by first-class mail to Mr. David Conrad, 100 Two Pine Drive, North Little Rock, AR 72117.

Certified by Tonni West on or before this 17th day of October, 2012.

ADEQ

ARKANSAS
Department of Environmental Quality

November 9, 2012

Waste Management of Arkansas, Inc.
Attn: Mr. David Conrad
100 Two Pine Drive
North Little Rock, AR 72117

RE: Name Change of Permit from Two Pine Landfill, LLC to Waste Management of Arkansas, Inc.
Permit Number: 0163-S1-R3 **AFIN: 60-00438**
Document Number: 63116 **Cross Reference Number: 63111**

Dear Mr. Conrad:

The Arkansas Department of Environmental Quality- Solid Waste Management Division staff has reviewed your request for name change of Solid Waste Permits 0163-S1-R3 from Two Pine Landfill, LLC to Waste Management of Arkansas, Inc.

Based on the submittals received requesting this change, the Arkansas Department of Environmental Quality hereby approves the owner name change from Permit Number 0163-S1-R3 to Waste Management of Arkansas, Inc. An updated copy of the permit is attached. Please review all terms and conditions of the permit to ensure compliance with all applicable requirements.

Please call me at (501) 682-0601 should you have any questions regarding the above information.

Sincerely,

Karen Bassett

Karen Bassett, Acting Chief
Solid Waste Management Division

Enclosure: Updated permit

cc: Susan Speake, Programs Branch Manager SWMD
Charles Stringer, District Field Inspector SWMD
Scott McWilliams, Enforcement Coordinator SWMD
Bryan Leamons, Technical Branch Manager SWMD
Jennifer Harmon, Terracon

PERMIT
FOR THE CONSTRUCTION AND OPERATION OF A SOLID WASTE DISPOSAL FACILITY

ISSUED BY

STATE OF ARKANSAS
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOLID WASTE MANAGEMENT DIVISION

Class 1 Landfill

Permit Number	**0163-S1-R3**
AFIN	**60-00438**
Effective Date	April 21, 2008 September 7, 2012 [owner name change]
Permit Owner & Address	Waste Management of Arkansas, Inc. 100 Two Pine Road North Little Rock, AR 72117
Facility Site Name & Address	Two Pine Landfill 100 Two Pine Road North Little Rock, Pulaski County, AR 72117
Location	At the junction of the North Belt Freeway (Highway 440 with Highway 67-167, between Highway 67-167 and the Union Pacific RR. and between the City of Sherwood and the City of Jacksonville.
Permitted Landfill Area	239.5± Acres
Property Area	530± Acres
Financial Assurance	$6,170,580.00
Design Engineer/Consultant	Terracon Consultants, Inc. 25809 I-30, Bryant, AR 72022 and Riley Park Hayden/RPH Engineers 3005 Breckenridge Boulevard Duluth, GA 30096

This permit authorizes the operation of the solid waste disposal facility as set forth in the permit application prepared by Waste Management Two Pine Landfill, LLC, hereinafter called "owner" or "permittee," and received by the Department of Environmental Quality on August 24, 2006. The application was completed through a series of documents furnished by the applicant as referenced within this document. This permit is issued pursuant to the provisions of the Arkansas Solid Waste Management Act (Arkansas Code Annotated 8-6-201 et seq.) as amended, hereinafter called the "Act"; Regulation Number 22, Arkansas Solid Waste Management Code, as adopted by the Pollution Control and Ecology Commission, hereinafter called Regulation 22; and all other applicable rules and regulations of the Department of Environmental Quality, hereinafter called "Department", and the following terms and conditions:

DESCRIPTION OF THIS PERMIT ACTION

This modification is for the lateral expansion of the Two Pine Class 1 Landfill. On the effective date, this permit supersedes all prior solid waste permits issued by the Department for this Class 1 Permit.

PERMIT CONDITIONS

1. This permit is for an approximately 239.5± acre waste disposal site as indicated on the approved plans. The final grades and elevations shall not be exceeded at any time or in the anticipation of settlement and consolidation of the waste mass. This permit shall expire when the authorized fill elevations have been attained and the facility is closed out in accordance with the provisions of Regulation 22, whichever occurs first.

    a. The Department shall be notified in writing upon construction of each disposal unit and upon facility closure in order that it may be inspected.

    b. Changes to or deviations from the construction/layout and operation of the facility, as indicated on the approved facility plans indicated below, and on the approved permit application documentation, are not authorized unless approved in writing by the Department.

    c. The approved application document is filed under the Document Identification Number 36562. Exceptions to 36562 are approved as referenced below.

2. The initial total amount of financial assurance is $6,170,580.00. Of this amount $3,859,725.00 dollars will be required for closure costs $2,310,855.00 will be required for the post-closure costs. This amount shall be subject to annual adjustments and may be increased at the discretion of the Department based upon the estimated cost for a third party to close the largest area requiring final cover during the active life of the facility and the cost for a third party to perform post closure care.

    a. The instruments used must be in one of the forms set forth in Regulation 22 or as otherwise approved by the Department.

    b. Operations allowed under this permit shall not commence until all financial assurance is satisfactorily filed with the Department.

    c. A portion or all of the financial assurance may be held by the Department beyond the time of cessation of disposal operations at the site to ensure satisfactory closure and post closure care in accordance with Regulation 22.

    d. No more than 50 acres of active disposal area shall be open in the new landfill expansion area. This requirement shall be addressed each year in the facility Annual Engineering and Inspection Report.

3. This permit is for the disposal of all waste eligible for a Class 1 sanitary landfill waste including all "special materials" as outlined in Regulation 22.701-708. Special Materials as identified in Regulation 22 do not require written authorization from the Department, provided the materials not specifically identified by the Special Materials section must be characterized by the

generator of the waste prior to acceptance for disposal in the landfill in accordance with the facility written hazardous waste exclusion program.

4. Each landfill waste cell shall be constructed in the sequence indicated in the approved plans and specifications. See Condition 17 for approved plans.

5. The bottom liner system for any newly constructed waste cell must consist of a minimum 60 mil HPDE flexible membrane liner and a minimum of twenty-four inches of compacted clay exhibiting a maximum hydraulic conductivity of 1×10^{-7} centimeters per second (cm/s). In areas designated by "Composite High Potentiometric/Piezometric Surface vs. Liner Isopach," DIN 51148, 3' engineered buffer shall also be constructed additional to the bottom liner with a maximum hydraulic conductivity of 6×10^{-7} centimeters per second (cm/s) and in accordance with the approved design.

   a. Proper construction of the bottom clay liner of each waste cell shall be observed and certified to the Department by a Registered Professional Engineer in a Construction Certification Report in accordance with the approved CQA Plan whenever a cell is prepared for use.

   b. The Construction Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation, and extent of area(s) actually constructed for use; and test locations.

   c. The Certification Report shall be submitted to the Department at least fourteen (14) days prior to waste placement in that cell.

6. The permittee shall implement the Hazardous Waste Exclusion Plan presented in Solid Waste Management Division Document Identifier (DIN) 51046. In addition to the implementation of the approved Hazardous Waste Exclusion Plan, the facility shall fully meet all requirements of Reg.22.412 regarding the exclusion of all unauthorized waste streams.

7. The permittee shall implement the Landfill Gas Monitoring Plan presented in Solid Waste Management Division DIN 36562. In addition to the implementation of the approved Landfill Gas Monitoring Plan, the facility shall fully meet the requirements of Reg.22.415 regarding the control of explosive gases. The facility shall monitor each of the gas monitoring probes detailed in the approved Landfill Gas Monitoring Plan and within all structures at the facility on a quarterly basis. The results shall be submitted to the Department within 14 days of each monitoring event.

8. The permittee shall implement the requirements detailed in the Operating Plan and Narrative presented in Solid Waste Management Division DIN 51046. In addition to the implementation of the approved Operating Plan and Narrative, the facility shall fully meet the requirements of Regulation 22.

9. The permittee shall implement the Construction Quality Assurance Plan presented in Solid Waste Management Division Document Identifier 51148. In addition to the implementation of the approved Construction Quality Assurance Plan, the facility shall fully meet all requirements of Reg.22.428. The facility shall be required to submit construction plans and specifications to the Department prior to each construction event at the facility.

10. The permittee shall implement the Closure and Post Closure Plan presented in Solid Waste Management Division DIN 51046. In addition to the implementation of the approved Closure and Post Closure Care Plan, the facility shall fully meet all requirements of Reg.22.1301 and Reg.22.1302. The post closure maintenance period for this facility shall be a minimum of 30

(thirty) years starting on the date the Department accept closure of the facility. The length of the post closure period may be decreased or increased by the Director in accordance with Regulation 22.1302(c) (4). Closure Certification Reports for final cover construction shall be submitted to the Department in accordance with regulation 22.1301 and in accordance with the approved closure plan.

11. Leachate collection removal and leachate storage systems shall be monitored and operated such that free flowing conditions are maintained in the leachate collection system. Leachate which is disposed in publicly owned treatment works (POTW) must comply with 40 CFR Part 403 (U.S. EPA Pretreatment regulations). Leachate shall otherwise be managed in accordance with the Leachate Management Plan found in Solid Waste Management Division DIN 51046.

12. At all times the disposal facility shall be maintained in good condition and operations shall be conducted by licensed, qualified on-site operator holding the appropriate license as required by Regulation Number 27, Certification of Sanitary Landfill Operators. Copies of the approved operating narrative, approved permit plans/specifications, operator licenses, stormwater pollution prevention plan (SWPPP), NPDES construction and/or stormwater permit(s) for the facility, and this disposal permit shall be maintained at the site for reference.

13. This permit may be revoked or modified whenever, in the opinion of the Department, the facilities are no longer in compliance with the Act, Regulation 22 and the applicable rules and regulations. This permit shall not relieve the permittee, its agents or employees from compliance with all provisions of the Act and Regulation 22.

14. The Department may issue modifications or amendments to this permit governing the design, operation, maintenance, closure or post-closure of the facility during the term of this permit. Such modifications or amendments shall be attached to this permit and shall be fully maintained and enforceable as a condition or conditions of this permit.

15. This permit is issued in reliance upon the statements and representations made in the application, operating narrative, the plans, specifications and related documents and the Department has no responsibility for the adequacy or proper functioning of the disposal facility. Nothing herein contained shall be construed as releasing the permittee form any liability from damage to persons or property by reason of the installation, maintenance operation of the disposal facility.

16. The Department, its employees, agents, or any authorized person shall have the right to enter the property at any time for any reason as set out in Regulation 22 for the purposes of, including but not limited to taking samples, reviewing the operating record, inspecting the facility and performing other enforcement or engineering action without interference or delay from the permittee.

17. The approved permit plans for the facility are as follows:

Landfill Cell Development Plan	Sheet 3 of 26 Doc. ID# 36562
Final Development Plan	Sheet 4 of 26, Doc. ID# 36562
Subgrade Development Plan 1	Sheet 6 of 26, Doc. ID# 36562
Subgrade Development Plan 2	Sheet 7 of 26, Doc. ID# 36562
Top of Clay Liner Development Plan 1	Revised Sheet 8, Doc. ID# 51046

Top of Clay Liner Development Plan 2	Revised Sheet 9, Doc. ID# 51046
Final Cover Plan	Revised Sheet 12, Doc. ID# 51046 Document ID Number 10509
Final Cover Plan 2	Revised Sheet 13, Doc. ID# 51046
Stormwater Plan 1	Sheet 14 of 26,Doc. ID# 36562
Stormwater Plan 2	Sheet 15 of 26, Doc. ID# 36562
Gas Management Plan	Sheet 16 of 26, Doc. ID# 36562 Document ID Number 10509
Leachate System Details	Sheet 22 of 26, Doc ID# 36562
Leachate System Details 2	Revised Sheet 23, Document ID# 51046
Cross Section A-A' through Cross Section I-I' & Composite High Potentiometric/ Piezometric Surface vs. Liner Isopach	Sheets 1 through 6 & Sheet 1 of 1, Doc ID# 51148
Landscaping Plan & Visual Screening Berm	Doc. ID# 52331

18. An initial permit fee has been received by the Department. Annual fees due thereafter shall be assessed in accordance with Regulation Number 9, Fee System for Environmental Permits. Failure to pay annual fees when due may result in revocation of this permit.

19. Any change in ownership or control of the operation of this landfill may be considered a permit modification and shall be fully disclosed to the Department. For purposes of this permit, ownership or control shall be determined by a change in the debt or equity of the permittee of five percent (5%) or more. Notwithstanding the above, the permittee is not required to disclose a change in ownership or control of the facility if the change is among the persons and/or entities previously disclosed to the Department in Section E of the Disclosure Statement or similar disclosure.

20. Disposal of bulk liquid waste in the landfill is prohibited. "Liquid waste" is waste which contains "free liquids" as defined by Methods 9095 (Paint Filter Test) as described in EPA Publication No. SW-846. Liquid wastes are permitted to be managed and disposed in accordance with the Liquid Waste Management Plan located in Solid Waste Management Division DIN 36562.

21. Measures to control and prevent storm water run-on from running through or into the active disposal area shall be constructed and maintained. Grading, dikes, diversion ditches, silt fencing, silt, traps, and other best management practices (BMP) for storm water control shall be provided as necessary to control/prevent off-site sediment accumulation from landfill related operations.

22. Appropriate NPDES construction/storm water permit(s) shall be obtained for storm water discharges from the landfill site and borrow sites. A Storm Water Pollution Prevention Plan (SWPPP), which outlines erosion and sediment control measures, shall be prepared and

implemented in accordance with applicable NPDES requirements. A copy of the SWPPP shall be maintained on-site for reference by operating staff.

23. The permittee shall comply with the air criteria requirements of Regulation 22.416. Those requirements include meeting the State Implementation Plan (SIP) pursuant to Section 110 of the Clean Air Act; prohibiting open burning of solid waste, unless authorized by the Department; and establishing fire safety procedures.

24. Litter control fences shall be provided in the active fill area for the control of blowing litter. Other litter control measures shall be implemented, if necessary, to confine litter to the smallest practicable extent and prevent litter from leaving the site.

25. The permittee must cover disposed waste with at least six inches of soil at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging. No portion of the waste is to be left exposed at the end of the operating day. Alternative materials for daily cover, such as synthetic materials, shall only be used when specifically authorized in writing by the Department. Any alternative daily cover that is proposed by the permittee must comply with Department guidelines and include specific written operating procedures that will be implemented to control disease vectors, fires, odors, blowing litter, and scavenging. The use of synthetic material will not be authorized unless it is incorporated within operating procedures that also rely on use of at least six inches of soil cover for daily cover on some days; any proposal for daily cover based solely upon full-time use of synthetic material will not be approved.

26. The final grades and elevations shown on the plans shall not be exceeded at any time or in anticipation of settlement and consolidation of the waste mass.

    a. Timely initiation and completion of closure of landfill cells or units shall be made in accordance with Regulation 22.1301(f) and (g).

    b. Proper construction of the final cover system shall be observed and certified in writing to the Department by a Registered Professional Engineer in a Construction Certification Report in accordance with the approved CQA Plan whenever a cell, area or phase of the landfill is closed-out.

    c. The Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation and extent of closed area(s); and test locations.

27. This permit authorizes one (1) active disposal area at the facility per Section 22.411 (c) of Regulation 22. Multiple working faces shall not be utilized at the facility unless the permittee can provide adequate justification for more than one working face and specific authorization for such is granted in writing by the Department. It is not anticipated that such authorization will be granted except on a temporary basis for highly unusual or emergency situations.

28. The Department's decision to issue this permit is final for purposes of appeal as of the date indicated in the Certificate of Service below. If any provision of these conditions or the application of these conditions thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of these conditions that can be given effect without the invalid provision or application. Therefore, to this end, the provisions of these conditions are declared to be severable.

29. The groundwater monitoring system will be monitored per the standard provisions of Regulation 22. A groundwater monitoring system shall be established and maintained at the facility that

consists of a sufficient number of wells or sampling points, installed at appropriate locations and depths that will yield representative samples of groundwater quality. The monitoring system shall be installed operated and maintained in accordance with the approved design specifications throughout the active life of the facility and throughout the post-closure care period.

30. The initial groundwater monitoring system for the WM Two Pine Class 1 landfill consists of 23 monitoring wells (MW-04A, MW-5N, MW-8R, MW-09R, MW-10A, MW-10B, MW-12, MW-14B, MW-15, MW-19, RMW-06R, nested wells: MW-20S, MW-21S, MW-22S, MW-23S, MW-24S, MW-25S, MW-20D, MW-21D, MW-22D, MW-23D, MW-24D and MW-25D) as shown on the Revised Figure 2 (DIN 51276) of the approved Sampling and Analysis Plan (DIN 51202). All new and existing monitoring wells will be considered as one monitoring well system. Any modification of the groundwater monitoring system will follow the provisions of Regulation 22.

31. Nested monitoring wells (MW-21S, MW-21D, MW-22S, MW-22D, MW-23S and MW-23D) will be replaced as landfill operations proceed northward toward the nested wells installed within the expansion area footprint and prior to the construction of Cells 10 and 11. Any decommission or replacement monitoring wells will follow all the provisions as stated in Regulation 22.1103 and will require SWMD approval.

APPROVED BY: **Arkansas Department of Environmental Quality**
5301 Northshore Drive
North Little Rock, Arkansas 72218

Karen Bassett
For Teresa Marks
11/9/12
Date

CERTIFICATE OF SERVICE

I, Tommi West, hereby certify that a copy of this permit has been mailed by first-class mail to Mr. David Conrad, 100 Two Pine Drive, North Little Rock, AR 72117, on or before this 13th day of November, 2012.

Permit Modification Application Summary and Rationale
Waste Management Two Pine Class 1 Landfill
Permit No. 0163-S1-R3; AFIN No. 60-00438

Permit Application Summary

This summary form consists of information submitted during the permitting process. It represents basic information from the administrative record utilized in forming recommendations from the Solid Waste Management Division. The entire file for the solid waste permit application specified below should be reviewed for complete details on the proposed facility.

Permit Application Summary	
1. Name of Applicant:	Waste Management of Arkansas, Inc.
2. Type of Facility:	Class 1 landfill
3. Engineering Firm:	Terracon Consultants, Inc. and Riley Park Hayden/RPH Engineers
4. Application Date:	Submitted on August 24, 2006 Submitted on September 4, 2012 [owner name chame]
5. Site Location	General: The site is located at the junction of the North Belt Freeway (HIGHWAY 440 with Highway 67-167 and the Union Pacific Railroad and between the City of Sherwood and the City of Jacksonville. Specific: Located in the parts of Sections 35 and 36, T-3-N, R-11-W; and in part of Section 2, T-2-N, R-11-W, Pulaski County, Arkansas.
6. Permit Area:	Total Property Area: 530± acres Permitted Landfill Area: 239.5± acres
Residences Within 2 Miles:	More than 100 in Sherwood and Jacksonville, Arkansas
Water Supplies Within 1/2 Mile:	Domestic water wells located within 0.5 mile of the expansion area were identified from the States' water well inventory files at the Arkansas Geological Commission. Three domestic water wells are located within one-half mile of either the current landfill boundary or from the proposed expansion area boundary. Two of these wells are located east of the site, while one is located north of the site across State Highway 67-167.
Wetlands:	Two types of wetlands were identified during wetland delineation activities: Riverine, intermittent, excavated streambed, seasonally flooded (Impacted Area 1). This area exhibits wetland conditions in a drainage channel that is approximately 0.2 acre and runs northwest between the current borrow area and the cultivated area at the site. Impacted Area 2 – palustrine, forested, broad-leaved deciduous, temporarily flooded is a narrow strip of woods that extends south from the Missouri-Pacific Railroad into the Proposed Borrow Area and comprises approximately 4.7 acres of wetland drainage. Additionally, impacted Area 2 includes approximately 9.21 acres of the western portion of bottomland hardwood forest that will adjoin the proposed landfill expansion area. The two wetland areas above will be impacted as a result of the proposed expansion. Wetland mitigation activities will take place to compensate for the loss of function and values of these impacted wetlands at the project site. The area proposed for wetland mitigation is approximately 43 acres of property previously cultivated for soybeans which will be restored to a bottomland

Permit Application Summary	
	hardwood forest.
Geology	The site is located within the Mississippi Embayment Physiographic Province in central Arkansas. Geology beneath the site consists of sediment and rock from the Quaternary, Tertiary and Paleozoic Systems. The exposed surficial stratum at the landfill is comprised of Quaternary-aged terrace deposits and alluvium which overlies a discontinuous Tertiary-aged Wilcox Group which stratigraphically overlies the Tertiary-aged Midway Group which rests unconformably above the Pennsylvanian-aged Atoka Formation. The lateral expansion area lies within the Arkansas River water basin in central Arkansas. This fluvial depositional environment has resulted in a complex nonuniform and highly variable surficial and shallow subsurface stratigraphy both vertically and horizontally. The Quaternary-aged alluvium is discontinuous and composed of silty clays, sand and clay zones. Buried stream deposits at the site are composed primarily of Pleistocene-aged alluvial and channel sediments deposited in point bar sequences. The alluvial deposits along Bayou Meto and the Arkansas River floodplains grade upward from coarse sand and gravels to fine silts and clays of overbank deposits.
Soils:	Regional soils located near the site consist of the Moreland silty clay, Rexor silt loam, Smithdale fine sandy loam, and the Amy silt loam (USDA, 2006). The Moreland series represents approximately 70 percent of the Two Pine Landfill site and is located in the southwestern two-thirds of the site with a small portion along the north bordering Bayou Meto while 20 percent is represented by the Rexor series located in the northeastern quarter. Less than 5 percent each is represented by the Smithdale and the Amy series. The Smithdale is located along the eastern boundary and the Amy silt loam is found in the extreme northeast corner along Bayou Meto.
Ground Water:	Regionally the primary potable source of groundwater in Pulaski County is the Quaternary-aged alluvial aquifer. At the Two Pine Landfill site, groundwater is generally first encountered within the Quaternary shallow fluvial deposits where present and when absent in the Pleistocene-aged unconsolidated stream and terrace deposits. The shallow, fluvial deposits may act as localized recharge zones for the transmission of groundwater to the Quaternary and other water bearing aquifers.
Surface Drainage Sequence:	Topographically the site is relatively flat with site drainage poor to fair. Bayou Meto, a stream located approximately 0.5 mile north/northeast of the Two Pine Landfill site, and its tributary, Five Mile Creek, drain the Two Pine property and adjacent areas. The Two Pine Landfill is located within the 100-year floodplain of Bayou Meto. The surface drainage of the landfill site has been augmented by a series of drainage ways that channel water to the northwest, discharging into Brushy Island Creek and eventually into Bayou Meto.
Waste Streams:	Class 1 Municipal Solid Waste as defined in Arkansas Regulation 22.
Capacity:	Total Capacity = 34,400,000 cubic yards
Disposal Rate	896,000 cubic yards per year (approximately may vary)
Projected Active Life after this modification	24 years (approximately, will vary with waste received)
Bottom Liner System:	60 mil HPDE flexible membrane liner and a minimum of twenty-four inches of compacted clay exhibiting a maximum hydraulic conductivity of 1×10^{-7} centimeters per second (cm/s).

Permit Application Summary	
Final Cover:	Alt. Cover 1: Consists of an intermediate soil cover, 18 inch clay liner with hydraulic conductivity of 1 x 10^{-7} centimeters per second (cm/s), 40 ml geomembrane, geocomposite drainage net, 12 inch final cover soil layer and 6 inch final cover soil layer capable of supporting vegetation. Alt. Cover 2: Consists of an intermediate soil cover, 12 inch clay liner with hydraulic conductivity of 1 x 10^{-6} centimeters per second (cm/s), 50 ml microspike HDPE drain liner, geotextile, 12 inch final cover soil layer and 6 inch final cover soil layer capable of supporting vegetation.

Permit Summary and Rationale

The following information was considered during the preparation of a draft permit for the proposed facility:

- Permit Pre-Application dated January 6, 2000.
- Permit Application dated August 24, 2006. The application was later completed through documents furnished on November 29, 2007 and December 21, 2007
- Correspondence from the Permittee; The Arkansas Solid Waste Management Code, as Amended (Regulation Number 22); and All other applicable rules and regulations of the Arkansas Department of Environmental Quality.
- Name change request, September 4, 2012.

Condition No.	Permit Conditions
1	Concerns the expiration of the permit. The permit will expire when the facility is filled to permit capacity and closed out in accordance with Regulation 22 and the approved Closure Plan.
2	Specifies the initial amount of financial assurance. (Regulations 22.1402 and 22.1043).
3	Concerns the type of disposal material permitted for the Class 1 landfill including special materials outlined in Regulation 22.701-708.
4	Concerns the construction sequence of each waste cell as indicated by the approved plans and specifications.
5	This permit condition establishes the approved bottom liner system configuration of the landfill.
6	This permit condition identifies the approved Hazardous Waste Exclusion Plan for the facility as required by 22.412.
7	This permit condition details the approved Explosive Gas Monitoring System and Plan as required by 22.415.
8	This permit condition establishes the approved Operating Plan and Narrative as required by Regulation 22.
9	This condition establishes the approved CQA Plan for the facility and requires review of construction documents prior to al construction events.
10	This permit condition establishes the approved Closure and Post Closure Care Plan for the facility as required by Regulation 22.1301 and 22.1302.
11	Specifies the leachate collection removal and leachate storage systems shall be monitored and operated such that free flowing conditions are maintained.
12	Concerns requirements to maintain the disposal facility in good operating condition under licensed, qualified, on-site landfill operators in accordance with Section 22.411 of Regulation 22 and with Regulation 27.
13	Concerns the right of the Department to revoke or modify the permit in the event the facility is no longer in compliance with the Arkansas Solid Waste Management Act, Regulation 22, or other applicable regulations in accordance with Section 22.308 of Regulation 22
14	Concerns issuance of modifications to the permit by the Department is in accordance with Sections 22.308 and 22.422 of Regulation 22.

Condition No.	Permit Conditions
15	States the Department has no responsibility for the proper functioning of the disposal facility and the permittee is not exempt from liability to third parties per Regulation 8.
16	Concerns the right of Department employees to enter the permittee's property to inspect the facility at any time without interference or delay as in accordance with Section 22.1501 of Regulation 22.
17	This permit condition details the approved landfill plans for the facility. Any changes to the plans listed will require a modification to the facility permit.
18	Concerns the payment of annual fees associated with the permit in accordance with Regulation 9. Failure to pay the annual fee may result in revocation of the permit.
19	Concerns permit transfer and disclosure is in accordance with Act 454 of 1991.
20	This condition restricts the disposal of bulk liquid waste at the facility.
21	Concerns the measures to control and prevent storm water run-on through or into the active disposal area.
22	Specifies the requirements for appropriate NPDES permit(s) and Storm Water Pollution Prevention Plan is in accordance with Sections 22.418, 22.419 and 22.427 of Regulation 22 and the Clean Water Act.
23	Concerns complying with the air criteria requirements of Regulation 22.416 including the requirements of the State Implementation Plan of the Clean Air Act. Also, prohibiting the open burning of solid waste and establishing fire safety procedures.
24	This permit condition requires the use of litter control fences or other litter control measures to be implemented for the control of blowing litter.
25	Specifies the requirement for daily or more frequent cover to prevent vectors, odors, fire, litter and scavenging. Alternative daily cover must comply with Department guidelines and include specific written operating procedures.
26	Specifies the final grades and elevations shown on the plans shall not be exceeded at any time. Requirements for a timely closure, proper construction of the final cover system and Certification Report in accordance with 22.1301.
27	This permit condition authorizes one (1) active disposal area. Authorization for a second working face may be granted provided adequate justification.
28	Concerns providing notice for the purpose of appeal of the final permit in accordance with Section 22.306 of Regulation 22 and in accordance with Regulation 8. Provisions regarding severability are in accordance with Section 22.1601 of Regulation 22.
29	This permit condition specifies that the groundwater monitoring system at the facility will be established, maintained, and monitored per the standard provisions of Regulation 22.
30	Specifies that the groundwater monitoring system for the landfill will include all new and preexisting monitoring wells and will be considered as one monitoring well system. Any modifications to the monitoring well system will be in accordance with Regulation 22.
31	Concerns specific monitoring wells that will be decommissioned and replaced due to landfill construction sequence of specific waste cells. Specifies that any decommission or replacement monitoring wells will be in accordance with Regulation 22.

This document was reviewed by Maria Matoska, Permit Engineer, Bryan Leamons, Engineer Supervisor and Kay McQueen, Geologist ***

ADEQ

ARKANSAS
Department of Environmental Quality

November 9, 2012

Waste Management of Arkansas, Inc.
Attn: Mr. David Conrad
100 Two Pine Drive
North Little Rock, AR 72117

RE: Minor Permit Modification Approval - Liquid Waste Management Plan and Transmittal of Permit Addendum
Two Pine Class 1 Landfill
Permit No. 0163-S1-R3; AFIN: 60-00438
Document Number: 63440 Cross Reference Number: 62820, 62956, 63413

Dear Mr. Conrad:

The Arkansas Department of Environmental Quality - Solid Waste Management Division (ADEQ-SWMD) staff has received and reviewed your Liquid Waste Management Plan (LWMP) submitted under a cover letter dated July 19, 2012 (Doc # 62820) related to the Two Pine Class 1 Landfill. The SWMD hereby approves the submitted LWMP and transmits the attached permit modification. The approved bulking materials are saw dust, fly ash, shale dust, rice hulls and coform absorbent.

This authorization is given in reliance upon the statements and representations made to the Department, and the Department has no responsibility for ultimate proper functioning of the disposal facility. The Department also reserves the right to request additional information if deemed necessary. This approval shall not remove any liability nor hold Waste Management of Arkansas, Inc. harmless in the event of any adverse environmental or public health conditions resulting from this authorization. Waste Management of Arkansas, Inc. shall be solely and fully responsible for implementing any corrective action necessary to remediate any adverse condition at the site based on this authorization.

Please call me at (501) 682-0608 should you have any questions regarding the above information.

Sincerely,

Karen Bassett

Karen Bassett, Acting Chief
Solid Waste Management Division

Enclosure: Permit Modification

cc: Heidi Love, Inspector Supervisor SWMD
Doug Ford, Pollution Management, Inc.

Permit Addendum

STATE OF ARKANSAS
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOLID WASTE MANAGEMENT DIVISION

Waste Management of Arkansas, Inc.	**AFIN:**	**60-00438**
Class 1 Landfill	**Permit No:**	**0163-S1-R3**

Date	Addendum to Permit
July 19, 2012 Doc # 62820 August 7, 2012 Doc #62956 November 5, 2012 Doc #63414	Permit Condition #20 in the current permit shall be replaced with: 20. Permittee shall follow the approved Liquid Waste Management Plan (LWMP) submitted under cover letter dated July 19, 2012 (Document #62509), August 7, 2012 (Document #62956) and November 5, 2012 (Document #63414). The following conditions shall apply to the operations of the liquid bulking activities: a) Except for foul weather conditions and equipment failures as outlined in the approved LWMP, storage of liquid waste overnight, whether in the designated surge tank or in the bulking pits, is prohibited. b) Treated liquid waste shall not exhibit free liquids as determined by USEPA Publication SW-846, Method 9095B, "Paint Filter Liquid Test" prior to disposal. Two (2) tests will be required for each batch of treated waste (i.e., each pit of treated waste) and the results recorded in the landfill operating record. Samples shall be obtained from the bulking pit at the mid-depth and bottom. c) Treated waste shall be capable of supporting landfill cover soil and equipment prior to disposal. Permittee shall perform and report demonstration test results of the treated waste under equipment loading for the different bulking materials/agents. Landfill equipment passing over the treated waste during the demonstration test shall leave distinct impressions of wheels or tracks with limited rutting or displacement of treated waste. In addition, no free liquids shall emerge from the treated waste during the demonstration test. If rutting or free liquids are observed during the demonstration test, the treatment shall be determined inadequate and further treatment shall be required. d) Records of the waste treatment shall be maintained in the facility's operating record. The liquid waste treatment records shall consist of data gathered from each batch of waste treated. Data to be recorded shall include the type and volume of liquid waste, the name of bulking material(s)/agent(s) used, and the volume and estimated weight of the amount of bulking material(s)/agent(s) used. From the gathered data an estimated ratio of bulking material to liquid waste shall be recorded. In addition, the facility shall keep the record of the volume of treated liquid waste disposed. e) To reduce potential stability problems during current operations and in future static landfill conditions, the facility must limit disposal of the treated liquid waste to no more than 15% of the total volume of waste disposed at the facility. This will be calculated on an annual basis. The facility must report the percent of the treated liquid waste as part of the annual engineering report. To exceed the 15% limit, the facility must submit a slope stability analyses and obtain prior approval from the Department. f) The Department reserves the right to prevent the facility from further receipt and processing of liquid waste should it be determined the materials are mishandled in any way.

APPROVED BY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Karen Bassett
For Teresa Marks, Director

9 Nov 12
Date

CERTIFICATE OF SERVICE

I, Tammi West, hereby certify that a copy of the aforementioned permit has been mailed by first-class mail to Mr. David Conrad, 100 Two Pine Drive, North Little Rock, 72117 on or before this 13th day of November, 2012.

Statement of Basis – Rationale for Permit Condition 22.306(c) requires permit decisions to include a rationale for the decisions made including technical basis for site specific conditions. Following is a summary of the rationale for the new and revised condition presented in this modification.	
Permit Condition #20 a	Regulation 22.420(d)
Permit Condition #20 b	Regulation 22.420(g)(5)
Permit Condition #20 c	Regulation 22.420(e) and 22.420(g)(3)
Permit Condition #20 d	Regulation 22.420(g)(3) and 22.420(g)(5)
Permit Condition #20 e	Regulation 22.431(b)
Permit Condition #20 f	Regulation 22.420(f)

ADEQ

A R K A N S A S
Department of Environmental Quality

August 18, 2014

Waste Management of Arkansas, Inc.
Attn: Mr. David Conrad
100 Two Pine Drive
North Little Rock, AR 72117

RE: Liquid Waste Management Plan Update - Administrative Permit Amendment and Transmittal of Permit Addendum
Two Pine Class 1 Landfill
Permit No. 0163-S1-R3; AFIN: 60-00438
Document Number: 65912 Cross Reference Number: 65845

Mr. Conrad:

The Arkansas Department of Environmental Quality - Solid Waste Management Division (ADEQ-SWMD) staff has received and reviewed your revised Liquid Waste Management Plan (LWMP) submitted under a cover letter dated April 17, 2014 (Doc # 65845) related to the Two Pine Class 1 Landfill. The SWMD hereby approves the submitted revised LWMP and transmits the attached permit modification. The approved bulking materials are saw dust, fly ash, shale dust, rice hulls, coform absorbent and coform absorbent with plastic.

This authorization is given in reliance upon the statements and representations made to the Department, and the Department has no responsibility for ultimate proper functioning of the disposal facility. The Department also reserves the right to request additional information if deemed necessary. This approval shall not remove any liability nor hold Waste Management of Arkansas, Inc. harmless in the event of any adverse environmental or public health conditions resulting from this authorization. Waste Management of Arkansas, Inc. shall be solely and fully responsible for implementing any corrective action necessary to remediate any adverse condition at the site based on this authorization.

Please call me at (501) 682-0600 should you have any questions regarding the above information.

Sincerely,

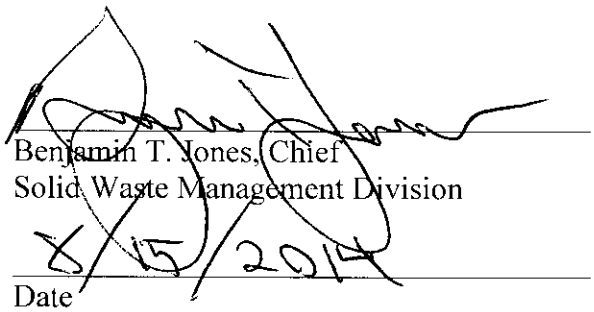
Benjamin T. Jones, Chief
Solid Waste Management Division

Enclosure: Permit Addendum

cc: Charles Stringer, District Field Inspector SWMD
Doug Ford, Pollution Management, Inc.

APPROVED BY:

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317



Benjamin T. Jones, Chief
Solid Waste Management Division

8/15/2014
Date

CERTIFICATE OF SERVICE

I, Barbara Mathews hereby certify that a copy of the aforementioned permit has been mailed by first-class mail to Mr. David Conrad, 100 Two Pine Drive, North Little Rock, 72117 on or before this 18th day of August, 2014.

Statement of Basis – Rationale for Permit Condition 22.306(c) requires permit decisions to include a rationale for the decisions made including technical basis for site specific conditions. Following is a summary of the rationale for the new and revised condition presented in this modification.	
Permit Condition #20 a	Regulation 22.420(d)
Permit Condition #20 b	Regulation 22.420(g)(5)
Permit Condition #20 c	Regulation 22.420(e) and 22.420(g)(3)
Permit Condition #20 d	Regulation 22.420(g)(3) and 22.420(g)(5)
Permit Condition #20 e	Regulation 22.431(b)
Permit Condition #20 f	Regulation 22.420(f)

Permit Addendum

STATE OF ARKANSAS
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOLID WASTE MANAGEMENT DIVISION

Waste Management of Arkansas, Inc.	AFIN:	60-00438
Class 1 Landfill	Permit No:	0163-S1-R3

Date	Addendum to Permit
April 17, 2014 Doc#65485	Permit Condition #20 in the current permit shall be replaced with: 20. Permittee shall follow the approved Liquid Waste Management Plan (LWMP) submitted under cover letter dated April 17, 2014 (Document #65485). The following conditions shall apply to the operations of the liquid bulking activities: a) Except for foul weather conditions and equipment failures as outlined in the approved LWMP, storage of liquid waste overnight, whether in tbe designated surge tank or in the bulking pits, is prohibited. b) Treated liquid waste shall not exhibit free liquids as determined by USEPA Publication SW-846, Method 9095B, "Paint Filter Liquid Test" prior to disposal. Two (2) tests will be required for each batch of treated waste (i.e., each pit of treated waste) and the results recorded in the landfill operating record. Samples shall be obtained from the bulking pit at the mid-depth and bottom. c) Treated waste shall be capable of supporting landfill cover soil and equipment prior to disposal. Permittee shall perform and report demonstration test results of the treated waste under equipment loading for the different bulking materials/agents. Landfill equipment passing over the treated waste during the demonstration test shall leave distinct impressions of wheels or tracks with limited rutting or displacement of treated waste. In addition, no free liquids shall emerge from the treated waste during the demonstration test. If rutting or free liquids are observed during the demonstration test, the treatment shall be determined inadequate and further treatment shall be required. d) Records of the waste treatment shall be maintained in the facility's operating record. The liquid waste treatment records shall consist of data gathered from each batch of waste treated. Data to be recorded shall include the type and volume of liquid waste, the name of bulking material(s)/agent(s) used, and the volume and estimated weight of the amount of bulking material(s)/agent(s) used. From the gathered data an estimated ratio of bulking material to liquid waste shall be recorded. In addition, the facility shall keep the record of the volume of treated liquid waste disposed. e) To reduce potential stability problems during current operations and in future static landfill conditions, the facility must limit disposal of the treated liquid waste to no more than 15% of the total volume of waste disposed at the facility. This will be calculated on an annual basis. The facility must report the percent of the treated liquid waste as part of the annual engineering report. To exceed the 15% limit, the facility must submit a slope stability analyses and obtain prior approval from the Department. f) The Department reserves the right to prevent the facility from further receipt and processing of liquid waste should it be determined the materials are mishandled in any way.

ADEQ

ARKANSAS
Department of Environmental Quality

April 14, 2015

Waste Management of Arkansas, Inc.
Two Pine Class 1 Landfill
Attn: Mr. David Conrad
100 Two Pine Drive
North Little Rock, AR 72117

RE: Approval of Minor Permit Modification and Transmittal of Permit Addendum
Two Pine Class 1 Landfill
Permit Number: 0163-S1-R3 **AFIN: 60-00438**
Document Number: 67112 **Cross Reference Number: 67110**

Dear Mr. Conrad:

ADEQ Solid Waste Management Division staff has received and reviewed a minor permit modification application regarding the revised Closure and Post Closure Care Plan, revised Landscaping Plan and alternate final cover demonstration. The SWMD hereby approves the minor permit modification and transmits the attached permit addendum.

This authorization is given in reliance upon the statements and representations made to the Department, and the Department has no responsibility for ultimate proper functioning of the disposal facility. The Department also reserves the right to request additional information if deemed necessary. This approval shall not remove any liability nor hold Waste Management of Arkansas, Inc. harmless in the event of any adverse environmental or public health conditions resulting from this authorization. Waste Management of Arkansas, Inc. shall be solely and fully responsible for implementing any corrective action necessary to remediate any adverse condition at the site based on this authorization.

Please call me at 682-0600 should you have any questions regarding the above information.

Sincerely,

Benjamin T. Jones, Chief SWMD

cc: Charles Stringer, District Field Inspector SWMD
Brad Fureigh, Terracon

ADDENDUM TO PERMIT

ISSUED BY

STATE OF ARKANSAS

DEPARTMENT OF ENVIRONMENTAL QUALITY

SOLID WASTE MANAGEMENT DIVISION

Facility:	**AFIN:**	**60-00438**
Waste Management of Arkansas, Inc. **Two Pine Class 1 Landfill**	**Permit No:**	**0163-S1-R3**

Application Reference (Date/doc ID)	**Description of Addendum to Permit**
February 4, 2015 Document #67110	Revised Application to include Alternate Final Cover Demonstration. An original permit modification application was submitted on October 22, 2014. This minor permit modification provides for a revision to the Closure and Post-Closure Care Plan and the Landscaping Plan.
Condition No.	**Additional or Revised Permit Conditions:**
2.d.	No more than 84 acres of active disposal area shall be open in the new landfill expansion area. This requirement shall be addressed each year in the facility Annual Engineering and Inspection Report.
10.	The permittee shall implement the Closure and Post Closure Plan presented in Solid Waste Management Division DIN 66656. In addition to the implementation of the approved Closure and Post Closure Care Plan, the facility shall fully meet all requirements of Reg.22.1301 and Reg.22.1302. The post closure maintenance period for this facility shall be a minimum of 30 (thirty) years starting on the date the Department accept closure of the facility. The length of the post closure period may be decreased or increased by the Director in accordance with Regulation 22.1302(c) (4). Closure Certification Reports for final cover construction shall be submitted to the Department in accordance with regulation 22.1301 and in accordance with the approved closure plan.
17.a.	As an amendment to the previously approved design plans, the following plans are also approved: Drawing SR1 Alternate Final Cover Location Plan Document No. 67110 Drawing SR2 Alternate Final Cover Detail Document No. 67110 As a clarification to previously approved closure sequence plans, the following plan drawings replace the previously approved plans for the LEA: Drawings 1-10 Closure Sequence 1-10 Document No. 67110

APPROVED BY: Arkansas Department of Environmental Quality

5301 Northshore Drive
North Little Rock, AR
72118-5317

Benjamin T. Jones, Chief - SWMD

4/14/2015
Date

CERTIFICATE OF SERVICE

I hereby certify that a copy of the aforementioned permit has been mailed by first-class mail to Mr. David Conrad, 100 Two Pine Drive, North Little Rock, AR 72117.

Certified by Barbara J. Mathews on or before this 14th day of April, 2015.

Statement of Basis – Rationale for Permit Conditions 22.306(c) requires permit decisions to include a rationale for the decisions made including technical basis for site specific conditions. Following is a summary of the rationale for the new and revised conditions presented in this modification.	
Condition #	**Permit Condition**
2.d.	This condition provides maximum open acreage which serves to limit largest area of the landfill ever requiring a final cover at any time during the active life as proposed by the applicant and as required by Reg. 22.1301(c) and 22.1401 et seq.
10.	This permit condition establishes the approved Closure and Post Closure Care Plan for the facility as proposed by the applicant and as required by Regulation 22.1301 and 22.1302.
17.a.	This permit condition details the addition of approved landfill plans for the facility. Plans are considered and acceptable alternative final cover for the areas depicted in the plans as allowable in accordance with 22.1301(b). Any changes to the plans listed will require a modification to the facility permit.

ADEQ

ARKANSAS
Department of Environmental Quality

July 8, 2016

Waste Management of Arkansas, Inc.
Two Pine Class 1 Landfill
Attn: Mr. David Conrad
100 Two Pine Drive
North Little Rock, AR 72117

RE: Approval of Minor Permit Modification and Transmittal of Permit Addendum
Two Pine Class 1 Landfill
Permit Number: 0163-S1-R3 **AFIN: 60-00438**
Document Number: 69872 **Cross Reference Number: 69532**

Dear Mr. Conrad:

The Arkansas Department of Environmental Quality – Office of Land Resources (ADEQ) Regulated Waste Programs has received and reviewed a minor permit modification application regarding the updated Liquid Waste Management Plan and a request for a proposed Recycling Operation Plan. APC&EC Regulation No. 22.411 states that salvage operations shall not be permitted at the operating face of the landfill. A salvage operation may be approved by the Department under the following conditions:

- An area has been designated by the permittee for recovery of the salvageable material;
- The operations shall not interfere with or otherwise delay the activities of the working face;
- The recovery of salvageable material must be conducted in an orderly manner;
- All salvageable material shall be removed from the landfill site daily, or properly stored so that it will not create a nuisance or unsightly appearance.

Based on the information provided in the Recycling Operation Plan, the proposed salvage operation meets the above requirements. The Department hereby approves the Recycling Operation Plan for the Two Pine Class 1 Landfill. The Department also hereby approves the minor permit modification and transmits the attached permit addendum for the revised Liquid Waste Management Plan.

This authorization is given in reliance upon the statements and representations made to the Department, and the Department has no responsibility for ultimate proper functioning of the disposal facility. The Department also reserves the right to request additional information if deemed necessary. This approval shall not remove any liability nor hold Waste Management of Arkansas, Inc. harmless in the event of any adverse environmental or public health conditions resulting from this authorization. Waste Management of Arkansas, Inc. shall be solely and fully responsible for implementing any corrective action necessary to remediate any adverse condition at the site based on this authorization.

Thank you for your cooperation on this matter. If you have any questions, or if we may be of service, please feel free to contact ADEQ-Office of Land Resources at (501) 682-0744.

Sincerely,

Tammie J. Hynum
Acting Sr. Operations Manager, Office of Land Resources

cc: OLR-McWilliams, Love, Cusher and Matoska
David McCormick-Terracon

ADDENDUM TO PERMIT
ISSUED BY

STATE OF ARKANSAS

DEPARTMENT OF ENVIRONMENTAL QUALITY

SOLID WASTE MANAGEMENT DIVISION

Facility:	**AFIN:**	**60-00438**
Waste Management of Arkansas, Inc. **Two Pine Class 1 Landfill**	**Permit No:**	**0163-S1-R3**

Application Reference (Date/doc ID)	**Description of Addendum to Permit**
May 4, 2016 Document #69532	Minor Permit Modification Application to include revised Liquid Waste Management
Condition No.	**Additional or Revised Permit Conditions:**
20.	Permit Condition #20 in the current permit shall be replaced with: 20. Permittee shall follow the approved Liquid Waste Management Plan (LWMP) submitted under cover letter dated May 2, 2016 (Document #69532). The following conditions shall apply to the operations of the liquid bulking activities: a) Except for foul weather conditions and equipment failures as outlined in the approved LWMP, storage of liquid waste overnight, whether in the designated surge tank or in the bulking pits, is prohibited. b) Treated liquid waste shall not exhibit free liquids as determined by USEPA Publication SW-846, Method 9095B, "Paint Filter Liquid Test" prior to disposal. Two (2) tests will be required for each batch of treated waste (i.e., each pit of treated waste) and the results recorded in the landfill operating record. Samples shall be obtained from the bulking pit at the mid-depth and bottom. c) Treated waste shall be capable of supporting landfill cover soil and equipment prior to disposal. Permittee shall perform and report demonstration test results of the treated waste under equipment loading for the different bulking materials/agents. Landfill equipment passing over the treated waste during the demonstration test shall leave distinct impressions of wheels or tracks with limited rutting or displacement of treated waste. In addition, no free liquids shall emerge from the treated waste during the demonstration test. If rutting or free liquids are observed during the demonstration test, the treatment shall be determined inadequate and further treatment shall be required. d) Records of the waste treatment shall be maintained in the facility's operating record. The liquid waste treatment records shall consist of data gathered from each batch of waste treated. Data to be recorded shall include the type and volume of liquid waste, the name of bulking material(s)/agent(s) used, and the volume and estimated weight of the amount of bulking material(s)/agent(s) used. From the gathered data an estimated ratio of bulking material to liquid waste shall be recorded. In addition, the facility shall keep the record of the volume of treated liquid waste disposed.

	e) To reduce potential stability problems during current operations and in future static landfill conditions, the facility must limit disposal of the treated liquid waste to no more than 15% of the total volume of waste disposed at the facility. This will be calculated on an annual basis. The facility must report the percent of the treated liquid waste as part of the annual engineering report. To exceed the 15% limit, the facility must submit a slope stability analyses and obtain prior approval from the Department. f) The Department reserves the right to prevent the facility from further receipt and processing of liquid waste should it be determined the materials are mishandled in any way.

APPROVED BY: Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR
72118-5317

_____
Tammie J. Hynum-Acting Sr. Operations Manager, Office of Land Resources

_____
Date

CERTIFICATE OF SERVICE

I hereby certify that a copy of the aforementioned permit has been mailed by first-class mail to Mr. David Conrad, 100 Two Pine Drive, North Little Rock, AR 72117.

Certified by_____ on or before this_____day of

_____, 2016.

ADEQ

ARKANSAS
Department of Environmental Quality

WASTE PROGRAMS, OFFICE OF LAND RESOURCES ROUTING SLIP

DATE 7/05/2016

Subject: Minor Permit Modification and Recycling Operation approval-Two Pine Class 1 Landfill

From: Maria Matoska

Route in turn to:	***Action Needed***	***Date Received***	***Date Reviewed***	***Initials***
Cusher	☑ Concurrence ☑ Review	7/5	7/5	AC
Hynum	☐ Concurrence ☐ Review	7/6/16	7/6/16	~~AH~~ comments 7/6/16
	☐ Concurrence ☐ Review			
	☐ Concurrence ☐ Review			
	☐ Concurrence ☐ Review			
	☐ Concurrence ☐ Review			

Note: Marking the Concurrence box indicates the individual agrees with the applicable text as it relates to their individual discipline and Work Section (e.g., Engineer; Risk Assessor; Geology; Compliance; Policy/Management), as applicable. Marking the Review box indicates the individual has read the document.

Return to [Maria Matoska] for distribution

COMMENTS: This is a permit mod for the Liquid Waste Management Plan. They also included a request for a recycling operation in this submittal.