



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

November 7, 2017

Craighead County SWDA  
Attn: Mr. Robert Hendrix  
P.O. Box 16777  
Jonesboro, AR 72403-6777

**RE: Approval of Minor Permit Modification and Transmittal of Permit  
Craighead County SWDA Class 1 Landfill  
Permit Number: 0254-S1-R4; AFIN: 16-00199  
Document Number: 72713; Cross Reference Numbers: 72481**

Dear Mr. Hendrix:

The Arkansas Department of Environmental Quality Office of Land Resources (ADEQ) has received and reviewed a minor permit modification application regarding the revised final cover configuration and updated Closure Plan and Post-Closure Care Plans. The ADEQ hereby approves the minor permit modification and transmits the attached permit modification.

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 Craighead County SWDA Class 1 Landfill harmless in the event of any adverse environmental or public health conditions resulting from this authorization. Craighead County SWDA 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 the permitting staff at 682-0744 should you have any questions regarding the above information.

Sincerely,

A handwritten signature in black ink that reads "Charles Johnson". The signature is written in a cursive style with a large, sweeping "C" and "J".

Charles Johnson, Senior Manager  
Office of Land Resources, Regulated Waste Operations

OLR - Baker, McWilliams, Cusher, Rich and Matoska

Enclosures: Permit and Rationale for Permit Conditions



**PERMIT**  
**FOR THE CONSTRUCTION AND OPERATION OF A**  
**SOLID WASTE DISPOSAL FACILITY**  
**ISSUED BY**  
**STATE OF ARKANSAS**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**PERMIT NUMBER:** 0254-S1-R4

**AFIN IDENTIFICATION:** 16-00923

**PERMIT CLASS:** Class 1 Landfill

**PERMIT OWNER AND ADDRESS:** Craighead County SWDA, P.O. Box 16777,  
Jonesboro, AR 72404

**FACILITY LOCATION:** Approximately 5 miles south of Jonesboro on Highway 1, East on County Road 476

**LEGAL DESCRIPTION:** Sections 32 and 33, Township 13 North, Range 4 East in Craighead County, Arkansas

**DESCRIPTION OF THIS PERMIT ACTION:** The permit modification includes a facility design modification to modify the final cover configuration. On the effective date, this permit modification supersedes all prior permits and permit modifications issued by the Department for this solid waste management facility.

**PERMIT CONDITIONS:** This permit modification provides the Craighead County SWDA Class 1 Landfill the authority to construct and operate the Solid Waste Disposal Facility set forth in this modification application dated September 4, 2017 and subsequent submittals. This permit modification 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 No. 22, Arkansas Solid Waste Management, as adopted by the Pollution Control and Ecology Commission, hereinafter called "APC&EC Regulation No. 22;" and all other applicable rules and regulations of the Arkansas Department of Environmental Quality, hereinafter called "Department," and the following terms and conditions:

1. This permit is for an approximately 520.32± acre facility with 297 ±acres permitted for 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. Authorization to fill shall expire when the authorized fill elevations have been attained. The facility shall be closed out in accordance with the provisions of this permit and APC&EC Regulation Number 22.
  - 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 54436 and 61939. Exceptions to 54436 and 61939 are approved as referenced in the following conditions.
2. The initial total amount of financial assurance is \$2,668,229.00. Of this amount \$1,206,863.90 dollars will be required for closure costs \$1,461,365.10 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 APC&EC Regulation No. 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 APC&EC Regulation No. 22.
  - d. No more than 26 acres of active disposal area shall be open in the new landfill expansion area. Compliance with this limit 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 APC&EC Regulation No. 22.701-708. Special Materials as identified in APC&EC 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 and progression of fill 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 textured HPDE flexible membrane liner and a minimum of twenty-four inches of compacted clay exhibiting a maximum hydraulic conductivity of  $1 \times 10^{-7}$  centimeters per second (cm/s).
  - a. Proper construction of the bottom 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 QA/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 Number (DIN) 54436. In addition to the implementation of the approved Hazardous Waste Exclusion Plan, the facility shall fully meet all requirements of APC&EC Regulation No. 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 54436, 58243, and 61939. In addition to the implementation of the approved Landfill Gas Monitoring Plan, the facility shall fully meet the requirements of APC&EC Regulation No. 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 54436, 57738, 58504 and 61020. In addition to the implementation of the approved Operating Plan and Narrative, the facility shall fully meet the requirements of APC&EC Regulation No. 22.
9. The permittee shall implement the Construction Quality Assurance Plan presented in Solid Waste Management Division Document Identifier 54436. In addition to the implementation of the approved Construction Quality Assurance Plan, the facility shall fully meet all requirements of APC&E Regulation No. 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 72481. In addition to the implementation of the approved Closure and Post Closure Care Plan, the facility shall fully meet all requirements of APC&EC Regulation No. 22.1301 and 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 APC&EC Regulation No. 22.1302(c)(4). Closure Certification Reports for final cover construction shall be submitted to the Department in accordance with APC&EC Regulation No. 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 61020.
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, Licensing of Operators of Solid Waste Management Facilities and Illegal Dumps Control Officers. 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, APC&EC Regulation Number 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 APC&EC Regulation Number 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 from any liability from damage to persons or property by reason of the installation, maintenance operation of the disposal facility or any act of the permittee, or the permittee's employees or agents.
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 APC&EC Regulation Number 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:

Progression of Fill Plan	NEC drawings 15 through 27 Document I.D. #54436
Final Cover Detail	Drawing 2 of 14 Doc. #61939
Stormwater Management Plan	Drawing 3 of 14 Doc. ID# 61020
Gas Management Plan	Drawings 4 and 4A of 14 Doc. ID# 61020
Details	Drawings 9 through 13, Doc ID# 61020
Leachate System Details	Sheet 14 of 14, Doc ID# 61020
Cross Section A-A through Section F-F	Drawings 5 through 8 Cross Document I.D. #61020
Bottom Liner Grading Plan	Drawing 1 of 14, Doc ID #61020
Final Cover Plan	Figure 2.5 Doc ID #72481

18. An initial permit fee has been received by the Department. Annual fees due thereafter shall be assessed in accordance with APC&EC Regulation Number 9, Fee System for Environmental Permits. The facility shall also be responsible for quarterly payments of other landfill disposal fees as required under APC&EC Regulation Number 11, Regulations for Solid Waste Disposal Fees; Landfill Post-Closure Trust Fees and Recycling Grants Program. Failure to pay annual fees or quarterly 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. Landfill may be considered a permit modification for "free liquids" as defined by Methods 9095 (Paint Filter Test) as described in EPA Publication No. SW-846.
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 APC&EC Regulation No. 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. The facility is authorized to utilize synthetic film for daily cover if the material selected is of sufficient weight and durability to control disease vectors, fires, odors, blowing litter and scavenging. The facility may not use alternate daily cover for more than six consecutive days. Upon notification from the Department the authorization to utilize alternate daily cover may be withdrawn or revoked at any time the Department determines that the alternate daily cover is not effective in controlling disease vectors, fires, odors, blowing litter and scavenging. The facility must place soil intermediate cover in compliance with APC&EC Regulation No. 22.413.
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 APC&EC Regulation No. 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 QA/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 APC&EC Regulation Number 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. Leachate derived from areas with a composite bottom liner system designed in accordance with Section 22.424(b) of APC&EC Regulation Number 22 may be recirculated back onto areas from whence it was derived, provided a management plan meeting the requirements of Section 22.429(k) of APC&EC Regulation Number 22 is submitted and approved by the Department. Leachate screening and monitoring shall be in accordance with Section 22.429(l). Records of leachate recirculation shall as a minimum, include the criteria specified in Sections 22.421(f) and 22.429(k) of APC&EC Regulation Number 22. Recirculation of leachate derived from and or placement onto areas not having a composite liner system designed in accordance with Section 22.424(b) of APC&EC Regulation Number 22 is strictly prohibited. Previously approved plans are not permitted. If leachate recirculation is to be proposed, the permittee shall submit a leachate recirculation plan for review and approval prior to implementation.
29. The Department prohibited. Previously approved plans are not permitted. If leachate recirculation is to be proposed, the permittee shall submit a leachate n 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.
30. The permittee shall furnish the Department annual engineering inspection reports in accordance with APC&EC Regulation No. 22.423 on the latest form provided by the Department. The annual engineering inspection report for Class 1 facilities is due on March 31 of each year and shall cover the preceding period beginning January 1 and ending December 31.
31. Any statements in the operational narrative, specifications, ground water sampling and analysis plan, and/or engineering plans that conflict with APC&EC Regulation Number 22, permit conditions herein, or other applicable laws and regulations shall not be considered authorized by the Department.
32. The groundwater monitoring program at the site shall follow the provisions of APC&EC Regulation Number 22. A ground water monitoring system shall be established and maintained at the Craighead County Solid Waste District Authority Class 1 Landfill that consists of a sufficient number of wells or sampling points, installed at appropriate locations and depths that will yield representative samples of ground water quality. The ground water monitoring system for this facility must at all times be properly maintained, be sampled in accordance with

the terms and conditions stipulated in this permit and comply with the monitoring requirements found in Chapter 12 in APC&EC Regulation Number 22. Once established at this landfill, the monitoring system shall be designed, installed, operated and maintained to perform to design specifications throughout the active life of the facility and into the post-closure care period.

- a. The initial ground water monitoring system for the Craighead County Solid Waste District Authority Class 1 Landfill will consist of (9) nine monitoring wells. The monitor wells utilized for water quality sampling are designated MW-6R, MW-8, MW-9R, MW-14R, MW-16R, MW-17R, MW-19, MW-20, and MW-21.
  - b. The current monitor well locations are shown on Figure 1 dated March 8, 2012 in the Ground Water Sampling and Analysis Plan Second Revision dated February 2012 by Terracon (Doc. 61939).
  - c. Prior to developing future phases, the permittee shall evaluate and update the ground water monitoring system based on the previous water quality information gathered to facilitate collection of representative ground water samples in the new waste disposal areas.
  - d. The facility will follow an approved Ground Water Sampling and Analysis Plan (GWSAP). Any GWSAP shall comply with the requirements of Regulation 22. The currently approved GWSAP is in Solid Waste Management Division DIN 61939 and is titled "Groundwater Sampling and Analysis Plan" Second Revision dated February 2012 by Terracon.
  - e. All statistical methodologies will be performed in a manner that complies with Regulation 22 and are consistent with recommendations for specific situations per the Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities Unified Guidance by EPA dated March 2009 (EPA 530-R-09-007) or the most current relevant EPA statistical guidance publication.
33. Any new monitor well(s) added to the ground water monitoring system shall be certified by a Registered Professional Geologist or a qualified ground water scientist as stipulated in APC&EC Regulation No. 22.1202(e). Within fourteen (14) days of submitting this certification to ADEQ, the permittee must notify the Director this monitoring system certification has been placed in the facilities operating record.
- The groundwater monitoring system certification shall confirm any new monitoring well(s) installed for this facility are capable of yielding water samples that are representative of the uppermost aquifer water quality at the sampling point. Monitoring system certification shall also confirm all monitoring system components have been constructed and installed in an acceptable manner following appropriate ASTM D 5092 well construction protocols.
34. The permittee shall comply with APC&EC Regulation No. 22.1103(a), which requires following construction, each well shall be developed to the degree necessary to restore formation hydraulic conductivity and insure retrieval of samples that are representative of formation ground water quality, at this facility.

Reports of replaced or decommissioned wells shall be submitted to the Department within 60 days or completion and shall be placed in the Operating Record.

35. The permittee shall obtain ground water samples which are representative of water quality passing the relative point of compliance specified in APC&EC Regulation No. 22.424(d) for this facility. The down gradient monitoring wells for this facility must be installed at this relative point of compliance.
36. Per APC&EC Regulation Number 22, the ground water monitoring frequency at the facility shall be at least semi-annual during the active life of the facility and the post-closure period. A ground water monitoring report will be submitted to the ADEQ within 90 days from the date of each monitoring event. Any newly installed monitoring well or replacement well(s) shall be sampled quarterly for a period of (1) one year to establish water quality conditions in accordance with APC&EC Regulation No. 22.1203(e). Wells MW-6R and MW-8 shall be sampled using an alternative frequency of every 18 months. Statistics shall also be performed on MW-6R and MW-8. Water level measurements will be taken during every sampling event.
37. The permittee must establish or have previously established background water quality parameter concentrations in hydraulically up-gradient and/or background well(s) which have not been affected by leakage from a landfill unit at this facility, in accordance with APC&EC Regulation No. 22.1203(e). If necessary, a minimum of four independent samples from each up-gradient or background well must be collected and analyzed.
  - a. During detection monitoring water quality samples from this facility shall be analyzed for APC&EC Regulation Number 22, Appendix 1 parameters, chloride, total dissolved solids, sulfate, total organic carbon, pH, specific conductance, iron and manganese [Regulation 22.1204(d)].
  - b. The Director, in accordance with APC&EC Regulation No. 22.1204(a)(1) and (2) may delete any Appendix 1 sampling parameter from this detection monitoring program if it can be demonstrated those constituents cannot reasonably be expected to be found in or derived from the waste disposed in the landfill.
38. Each monitoring well shall be sampled by qualified personnel properly trained and familiar with appropriate procedures and techniques for the collection of ground water samples.
  - a. Prior to purging the monitor wells, static water level measurements shall be taken, recorded and the data used to determine the rate and direction of ground water flow in the upper most aquifer. Measurements are to be taken from the surveyed benchmark on the top rim of the well casing.
  - b. Sample analysis shall be performed by a laboratory that is properly certified by ADEQ to run the type of analysis required by APC&EC Regulation Number 22.
39. Analysis of ground water samples shall be in accordance with the most current version of EPA Report SW-846 Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.

- a. Volatile organic compounds analysis shall be in accordance with Method 8260 while metal analysis shall be in accordance with Method 6010 or a method from the 7000 series or an equivalent. Method detection limits for each parameter must be reported.
  - b. All parameter concentrations that are above the Method Detection Limit (MDL) must be reported.
  - c. The Department may modify the analytical parameters, sampling frequency or the sampling methods required under this permit based on any information received by ADEQ, based on the analytical results received for this facility and/or based on new laboratory techniques which may result in more accurate water quality analysis from samples taken at this facility.
40. The permittee must select a statistical method approved by the Department for evaluating water quality monitoring results for each constituent to determine whether a statistically significant increase (or decrease in the case of pH) occurs for each ground water monitoring constituent in conformance with the requirements of APC&EC Regulation No. 22.1203(g)(h) and (i).
41. Ground water monitoring reports shall be submitted to the SWMD. The report shall summarize the results of sampling and include a determination of whether a statistically significant increase over background values has occurred for each constituent required to be analyzed.
- a. Quarterly analytical results shall be submitted directly to the Solid Waste Management Division (SWMD) from the contract laboratory on or before March 31, June 30, September 30, and December 31.
  - b. Semi-Annual analytical results shall be submitted directly to the SWMD on or before June 30 and December 31 each year thereafter.
42. The permittee, after initiating a Detection Monitoring Program at this facility, should a statistically significant increase over established background concentration be detected for one or more of the monitored constituents, the permittee must undertake the following actions:
- a. Must, within 14 days of this finding, place a notice in the facility Operating Record indicating which constituents have shown statistically significant increase (SSI) from background levels, and notify the Director that this notice was placed in the operating records; and,
  - b. Establish an Assessment Monitoring Program meeting the requirements of APC&EC Regulation No. 22.1205 within 90 days except as provided for in Regulation 22.1204(c)(3); or
  - c. The permittee may establish an alternate source other than the landfill has caused the contamination or the SSI was the result of a sampling error, laboratory error,

statistical error or a natural variation in ground water quality at that location. A report documenting this demonstration must be certified by a qualified ground water scientist or be approved by the Director and be placed in the facilities operating record.

- d. If, after 90 days, the permittee has not provided the Director a successful alternate source demonstration for this facility, as provided for in APC&EC Regulation No. 22.1204(c)(3), the permittee must initiate an Assessment Monitoring Program.
43. While a facility is in an Assessment Monitoring Program, if one or more of the assessment monitoring constituents are detected at a statistically significant level exceeding the established Ground Water Protection Standards (GWPS) defined under APC&EC Regulation No. 22.1205(h) or (i), the permittee must follow the steps of APC&EC Regulation No. 22.1205(g) including initiation of Assessment of Corrective Measures for the facility, in accordance with APC&EC Regulation No. 22.1206. Based upon the results of an Assessment of Corrective Measures, the permittee must proceed with Selection of a Remedy in accordance with APC&EC Regulation No. 22.1207 and then proceed with Implementation of a Corrective Action Program for the facility in accordance with APC&EC Regulation No. 22.1208.

**ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY  
PERMIT  
FOR A SOLID WASTE MANAGEMENT FACILITY**

PERMITTEE: Craighead County SWDA  
OWNER: Craighead County SWDA  
OPERATOR: Craighead County SWDA  
FACILITY LOCATION: Jonesboro, Craighead County, Arkansas  
DOCUMENT ID NUMBER: 72713  
ACTIVITY: Minor Modification  
AFIN: 16-00923  
PERMIT NUMBER: 0254-S1-R4

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 No. 22, Arkansas Solid Waste Management Rules, as adopted by the Pollution Control and Ecology Commission, hereinafter called "APC&EC," a permit is issued by the Arkansas Department of Environmental Quality (ADEQ) to the Craighead County SWDA(Permittee), to operate a solid waste management facility located in Jonesboro, Craighead County, Arkansas.

The Permittee's location is summarily described as follows:

Sections 32 and 33, Township 13 North, Range 4 East in Craighead County, Arkansas

The Permittee shall comply with all terms and conditions of this Permit. This Permit consists of the conditions contained in APC&EC Regulation No. 22, as specified in the Permit. Applicable regulations are those which are in effect on the date of issuance of the Permit Modification, in accordance with APC&EC Regulation No. 22. Nothing contained herein shall negate the Permittee's duty to comply with the regulations and this Permit, or ADEQ's ability to enforce the regulations and this Permit. This Permit is based on the assumption that the information submitted in the Application of September 4, 2017 is accurate, and the facility will be operated as specified in the Application and this Permit.

The Permittee shall inform ADEQ of any deviation from or changes in the information in the Application which would affect the Permittee's ability to comply with the applicable regulations or

Permit conditions.

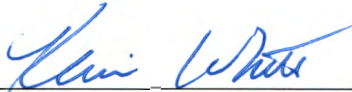
The Director reserves the right to amend or add conditions to this Permit, as necessary to be protective of human health and the environment.

This Permit shall be effective on service of notice of the permit modification decision, as specified in APC&EC Regulation No. 8 (Administrative Procedures), Part 2, Section 2.1.10(b).

The Permit Modification includes the modification to the final cover configuration.

For the purposes of resolving conflicts between requirements to which the Permittee is subject, the following hierarchy and order of authority will govern in the Permittee's duty to comply: Regulations promulgated under APC&EC Regulation No. 22; General Permit Conditions; Permit Conditions/standards specific to activities, and the Permit Modification Application(s).

Issued this 7<sup>th</sup> day of November, 2017



Kevin White  
Associate Director  
Office of Land Resources  
Arkansas Department of Environmental Quality

Date of Service: 11.9.17  
(Certificate of Mailing of Notice of Decision)

Effective Date: \_\_\_\_\_  
**END OF PERMIT SIGN-OFF SHEET**

### Permit Rationale

Condition No.	Permit Conditions
1	Concerns the expiration of the permit. The permit will expire when the facility is filled to permit capacity and the facility will be closed out in accordance with APC&EC Regulation Number 22 and the approved Closure Plan.
2	Specifies the initial amount of financial assurance and limits the maximum acreage allowed to be open per the approved Closure Plan. ( APC&EC Regulation No. 22.1402 and 22.1403).
3	Concerns the type of disposal material permitted for the Class 1 landfill including special materials outlined in APC&EC Regulation No. 22.701-708.
4	Concerns the construction sequence of each waste cell and fill progression 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 APC&EC Regulation No. 22.412.
7	This permit condition details the approved Explosive Gas Monitoring System and Plan as required by APC&EC Regulation No. 22.415.
8	This permit condition establishes the approved Operating Plan and Narrative as required by APC&EC Regulation Number 22.
9	This condition establishes the approved CQA Plan for the facility and requires review of construction documents prior to all construction events.
10	This permit condition establishes the approved Closure and Post Closure Care Plan for the facility as required by APC&EC Regulation No. 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 APCE&EC Regulation 22 and with APC&EC 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, APC&EC 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 APC&EC 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 APC&EC 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 and quarterly fees associated with the permit in accordance with APC&EC Regulation 9 and Regulation 11. 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. The facility is not permitted for a liquid bulking operation. Exemptions are provided in APC&EC Regulation No. 22.420.
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 APC&EC Regulation 22 and the Clean Water Act.
23	Concerns complying with the air criteria requirements of APC&EC Regulation No. 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. This permit condition authorizes the use of synthetic film as alternate daily cover.
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 APC&EC Regulation No. 22.1301.
27	This permit condition authorizes one (1) active disposal area. Authorization for a second working face may be granted provided adequate justification.

Condition No.	Permit Conditions
28	This permit condition prohibits leachate recirculation without prior approval from the Department. Leachate management and disposal must meet requirements of APC&EC Regulation No. 22.429(k). Leachate screening and monitoring shall follow the requirements of Regulation No. 22.429(l) and reporting requirements of Regulation No. 22.421(f).
29	Concerns providing notice for the purpose of appeal of the final permit in accordance with Section 22.306 of APC&EC Regulation 22 and in accordance with Regulation 8. Provisions regarding severability are in accordance with Section 22.1601 of APC&EC Regulation Number 22.
30	This permit condition concerns the submittal of annual engineering inspections reports as specified by APC&EC Regulation No. 22.423.
31	Specifies that any statements in the operational narrative, specifications, ground water sampling and analysis plan, and engineering plans that conflict with APCE&EC Regulation Number 22, permit conditions, or other applicable laws and regulations shall not be considered authorized by the Department.
32	The ground water monitoring program at the site shall follow the provisions of APC&EC Regulation Number 22. Requires the permittee to utilize and maintain a ground water monitoring system to adequately monitor potential impacts on local ground water supplies from facility operations. The monitoring system must have a sufficient number of wells or sampling points that will yield water samples representative of the water quality around the landfill. References the proposed well identification numbers and well locations for this facility (APC&EC Regulation No. 22.1202(a)). The facility must follow an approved groundwater sampling and analysis plan that complies with APC&EC Regulation No. 22.1203.
33	Requires the permittee to certify the new and/or existing ground water monitoring system at this facility (APC&EC Regulation No. 22.1202(e)). Requires the ground water monitoring system to be installed according to appropriate ASTM standards (APC&EC Regulation No. 22.1202(c)) and the monitoring system be certified as adequate and properly constructed given the geologic conditions of the site by a Registered Professional Geologist. (APC&EC Regulation No. 22.1202)
34	Requires the permittee to following monitor well installation to re-establish hydraulic conductivity to insure retrieved water samples are representative of formation ground water quality at this site. Requires the permittee to insure the ground water monitoring wells are capable of providing samples that are within the maximum allowable ranges for water clarity or turbidity. If turbidity-free samples from a well cannot be obtained, the permittee may need to redevelop the monitoring well, replace the well or provide justification the turbidity ranges shown are representative of ambient water quality in the formation (APC&EC Regulation No. 22.1103(a)). Requires reporting of replaced or decommissioned wells.

Condition No.	Permit Conditions
35	Requires the permittee to place downgradient monitor wells at the relative point of compliance from the waste mass (within 150 meters and on land owned by the municipal solid waste landfill unit) (APC&EC Regulation No. 22.1202(a)(2)).
36	Requires the permittee for any newly installed monitoring well to sample quarterly for a period of one year in accordance with (APC&EC Regulation No. 22.1203(e)). Thereafter, any new and/or existing wells in the ground water monitoring system are to be sampled semi-annual. (Note: wells MW-6R and MW-8 will be sampled using an alternative frequency of every 18 months. Statistics will still be performed on these wells. Water level measurements will be taken during every sampling event.)
37	Requires the permittee to establish or previously have established background water quality parameter concentrations in hydraulically up-gradient wells and/or background wells which have not been affected by leakage from a landfill unit at this facility (APC&EC Regulation No. 22.1203(e)). In detection monitoring, requires up-gradient and downgradient wells to be sampled from Regulation Number 22, Appendix 1 parameters, chloride, total dissolved solids, sulfate, total organic carbon, pH, specific conductance, iron and manganese (APC&EC Regulation No. 22.1204(d)). The Director may designate an alternate list of parameters in accordance with (APC&EC Regulation No. 22.1204(a)(2)).
38	Requires the permittee to have qualified personnel trained in the proper sampling and measuring techniques take water samples. Water level measurements must be taken prior to purging and sampling the monitoring wells, and uses the resulting data to determine the rate and direction of ground water flow in and around the facility. The samples analysis shall be performed by a lab certified by ADEQ (APC&EC Regulation No. 22.1203).
39	Requires the permittee to analyze ground water samples in accordance with EPA Report SW846 or an equivalent methodology. Parameter concentrations above the MDL must be reported. The Department reserves the right to modify the GWM sampling program based on any information received (APC&EC Regulation No. 22.1204).
40	The permittee must select a statistical method approved by the Department for evaluating GWM data in conformance with the requirements of APC&EC Regulation No. 22.1203(g)(h) and (i).
41	Requires the facility to submit ground water monitoring reports. Requires the permittee to submit analytical reports to ADEQ on specific dates.
42	Requires the permittee to submit for review and approval a statistical evaluation package to determine statistically significant increases have occurred during the Detection Monitoring Program, over established background water quality standards (APC&EC Regulation No. 22.1203(g)). Requires the permittee if necessary, to establish an Assessment Monitoring Program and outlines the procedures for initiating an Assessment Monitoring Program at the facility, if warranted (APC&EC Regulation No. 22.1204(c)(3)) and APC&EC Regulation No. 22.1205.

<b>Condition No.</b>	<b>Permit Conditions</b>
43	<p>Requires a facility in Assessment Monitoring to determine if assessment monitoring constituents have been detected at a statistically significant level exceeding the established Ground Water Protection Standards. If a statistically significant level exceeding the Ground Water Protection Standards has occurred the permittee must follow steps of APC&amp;EC Regulation No. 22.1205(g) and initiate an Assessment of Corrective Measures at this facility. The permittee must then provide a Selection of Remedy and proceed with the Implementation of a Corrective Action Program for this facility. This condition allows ADEQ to address potential water quality impacts on human health and the environment in a timely manner. (APC&amp;EC Regulation No. 22.1205(g), APC&amp;EC Regulation No. 22.1205(h) or (i); APC&amp;EC Regulation No. 22.1206; APC&amp;EC Regulation No. 22.1207 and 22.1208).</p>

# ADEQ

ARKANSAS  
Department of Environmental Quality

May 2, 2012

CCSWDA  
Attn: Mr. Robert Hendrix  
P.O. Box 16777  
Jonesboro, AR 72403-6777

**RE: Issuance of Final Permit CCSWDA Class 1 Landfill**  
**Permit No: 0254-S1-R4; AFIN: 16-00923**  
**Document No: 62306 Cross Reference No: 59248**

Dear Mr. Hendrix:

Enclosed is a permit authorizing the construction, operation, and maintenance of the CCSWDA Class 1 solid waste landfill facility as described in your application submitted on January 12, 2009, and subsequent documentation as referenced in the permit. The permit number for the facility is 0254-S1-R4. 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 (none received).

The permit is granted subject to the terms and conditions specified in the permit. The initial amount of financial assurance required is \$2,668,229.00 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.

All persons submitting written comments during the thirty (30) day public comment period, and all other persons entitled to do so, may request an adjudicatory hearing and Commission review on whether the decision of the Director should be reversed or modified. Such a request shall be in the form and manner required by Regulation 8.603, including filing a written Request for Hearing with the APC&E Commission Secretary at 101 E. Capitol Ave., Suite 205, Little Rock, Arkansas 72201 within thirty (30) calendar days of the date of issuance of this final permit decision as provided in Reg. 8.211(B)(1). If you have any questions about filing the request, please call the Commission Secretary at 501-682-7890.

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,



Roger Lawrence  
Chief - Solid Waste Management Division

Enclosures: Permit  
Permit Statement of Basis Summary and Rationale

cc: Terracon, 25809 I-30 South, Bryant, AR 72022  
Heidi Love, Inspector Supervisor, SWMD  
Susan Speake, Programs Branch Manager SWMD

**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	<b>0254-S1-R4</b>
AFIN	<b>16-00923</b>
Effective Date	May 2, 2012
Permit Owner & Address	Craighead County SWDA P.O. Box 16777 Jonesboro, AR 72403
Facility Site Name & Address	Craighead County SWDA 328 CR 476 Jonesboro, AR 72404
Location	Approximately 5 miles south of Jonesboro on Highway 1, East on County Road 476. Sections 32 and 33, Township 13 North, Range 4 East in Craighead County, Arkansas.
Permitted Landfill Area	+/- 297 acres
Property Area	520.32 acres
Permitted Landfill Capacity	7,005,273 cubic yards
Financial Assurance	\$2,668,229.00
Design Engineer/Consultant	Terracon Consultants, Inc. Terracon 25809 Interstate 30 South Bryant, AR 72022 and Northstar Engineering Consultants, Inc. 207 South Main Street Bentonville, AR 72712

This permit authorizes the operation of the solid waste disposal facility as set forth in the permit application prepared by Craighead County Solid Waste Disposal Authority, hereinafter called "owner" or

“permittee,” and received by the Department of Environmental Quality on January 12, 2009. 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:

### Summary of Previous Major Permit Actions

	Number	Date Issued
Permit Number:	0254-S	May 4, 1990
Modification #1:	0254-SR1	November 13, 1991
Modification #2:	0254-SR2	March 13, 1992
Modification #3:	0254-S1-R2	October 17, 1994
Modification #4:	0254-S1-R3	July 7, 2004

This major permit modification was completed through a review of a series of documents furnished by the applicant dated August 22, 2006 (SWMD# 36544), January 9, 2009 (SWMD# 54436), February 6, 2009 (SWMD# 54627), February 18, 2010 (SWMD# 57030), March 23, 2010 (SWMD# 57225), March 30, 2010 (SWMD# 57294), May 10, 2010 (SWMD# 57623), June 4, 2010 (SWMD# 57738), August 23, 2010 (SWMD# 58167), September 2, 2010 (SWMD# 58243), October 2010 (SWMD# 58488), November 4, 2010 (SWMD# 58504), December 7, 2010 (SWMD# 58647), October 4, 2011 (SWMD# 61019), October 4, 2011 (SWMD# 61020), October 18, 2011 (SWMD# 61106), and March 8, 2012 (SWMD# 61939).

### DESCRIPTION OF THIS PERMIT ACTION

This modification is for the vertical expansion of the Craighead County SWDA 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 520.32± acre facility with 297 ±acres permitted for 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. Authorization to fill shall expire when the authorized fill elevations have been attained. The facility shall be closed out in accordance with the provisions of this permit and Regulation 22.
  - 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 54436 and 61939. Exceptions to 54436 and 61939 are approved as referenced in the following conditions.
2. The initial total amount of financial assurance is \$2,668,229.00. Of this amount \$1,206,863.90 dollars will be required for closure costs \$1,461,365.10 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 26 acres of active disposal area shall be open in the new landfill expansion area. Compliance with this limit 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 and progression of fill 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 textured HPDE flexible membrane liner and a minimum of twenty-four inches of compacted clay exhibiting a maximum hydraulic conductivity of  $1 \times 10^{-7}$  centimeters per second (cm/s).
  - a. Proper construction of the bottom 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 QA/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 Number (DIN) 54436. 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 54436, 58243, and 61939. 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 54436, 57738, 58504 and 61020. 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 54436. 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 54436. 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 61020.
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, Licensing of Operators of Solid Waste Management Facilities and Illegal Dumps Control Officers. 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 from any liability from damage to persons or property by reason of the installation, maintenance operation of the disposal facility or any act of the permittee, or the permittee's employees or agents.
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:

Progression of Fill Plan	NEC drawings 15 through 27 Document I.D. #54436
Final Cover Detail	Drawing 2 of 14 Doc. #61939
Stormwater Management Plan	Drawing 3 of 14 Doc. ID# 61020
Gas Management Plan	Drawings 4 and 4A of 14 Doc. ID# 61020
Details	Drawings 9 through 13, Doc ID# 61020
Leachate System Details	Sheet 14 of 14, Doc ID# 61020
Cross Section A-A through F-F	Drawings 5 through 8 CrossSection Document I.D. #61020
Bottom Liner Grading Plan	Drawing 1 of 14, Doc ID #61020
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. The facility shall also be responsible for quarterly payments of other landfill disposal fees as required under Regulation 11, Regulations for Solid Waste Disposal Fees; Landfill Post-Closure Trust Fees and Recycling Grants Program. Failure to pay annual fees or quarterly 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.
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. The facility is authorized to utilize synthetic film for daily cover if the material selected is of sufficient weight and durability to control disease vectors, fires, odors, blowing litter and scavenging. The facility may not use alternate daily cover for more than six consecutive days. Upon notification from the Department the authorization to utilize alternate daily cover may be withdrawn or revoked at any time the Department determines that the alternate daily cover is not effective in controlling disease vectors, fires, odors, blowing litter and scavenging. The facility must place soil intermediate cover in compliance with Regulation 22.413.
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 QA/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. Leachate derived from areas with a composite bottom liner system designed in accordance with Section 22.424(b) of Regulation 22 may be recirculated back onto areas from whence it was derived, provided a management plan meeting the requirements of Section 22.429(k) of Regulation 22 is submitted and approved by the Department. Leachate screening and monitoring shall be in accordance with Section 22.429(l). Records of leachate recirculation shall as a minimum, include the criteria specified in Sections 22.421(f) and 22.429(k) of Regulation 22. Recirculation of leachate derived from and or placement onto areas not having a composite liner system designed in accordance with Section 22.424(b) of Regulation 22 is strictly prohibited. Previously approved plans are not permitted. If leachate recirculation is to be proposed, the permittee shall submit a leachate recirculation plan for review and approval prior to implementation.
29. 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.
30. The permittee shall furnish the Department annual engineering inspection reports in accordance with Regulation 22.423 on the latest form provided by the Department. The annual engineering inspection report for Class 1 facilities is due on March 31 of each year and shall cover the preceding period beginning January 1 and ending December 31.
31. Any statements in the operational narrative, specifications, ground water sampling and analysis plan, and/or engineering plans that conflict with Regulation 22, permit conditions herein, or other applicable laws and regulations shall not be considered authorized by the Department.
32. The groundwater monitoring program at the site shall follow the provisions of Regulation 22. A ground water monitoring system shall be established and maintained at the Craighead County Solid Waste District Authority Class 1 Landfill that consists of a sufficient number of wells or sampling points, installed at appropriate locations and depths that will yield representative samples of ground water quality. The ground water monitoring system for this facility must at all times be properly maintained, be sampled in accordance with the terms and conditions stipulated in this permit and comply with the monitoring requirements found in Chapter 12 in Regulation 22. Once established at this landfill, the monitoring system shall be designed, installed, operated and maintained to perform to design specifications throughout the active life of the facility and into the post-closure care period.
  - a. The initial ground water monitoring system for the Craighead County Solid Waste District Authority Class 1 Landfill will consist of (9) nine monitoring wells. The monitor wells utilized for water quality sampling are designated MW-6R, MW-8, MW-9R, MW-14R, MW-16R, MW-17R, MW-19, MW-20, and MW-21.
  - b. The current monitor well locations are shown on Figure 1 dated March 8, 2012 in the Ground Water Sampling and Analysis Plan Second Revision dated February 2012 by Terracon (Doc. 61939).

- c. Prior to developing future phases, the permittee shall evaluate and update the ground water monitoring system based on the previous water quality information gathered to facilitate collection of representative ground water samples in the new waste disposal areas.
- d. The facility will follow an approved Ground Water Sampling and Analysis Plan (GWSAP). Any GWSAP shall comply with the requirements of Regulation 22. The currently approved GWSAP is in Solid Waste Management Division DIN 61939 and is titled "Groundwater Sampling and Analysis Plan" Second Revision dated February 2012 by Terracon.
- e. All statistical methodologies will be performed in a manner that complies with Regulation 22 and are consistent with recommendations for specific situations per the Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities Unified Guidance by EPA dated March 2009 (EPA 530-R-09-007) or the most current relevant EPA statistical guidance publication.

33. Any new monitor well(s) added to the ground water monitoring system shall be certified by a Registered Professional Geologist or a qualified ground water scientist as stipulated in Regulation 22.1202(e). Within fourteen (14) days of submitting this certification to ADEQ, the permittee must notify the Director this monitoring system certification has been placed in the facilities operating record.

The groundwater monitoring system certification shall confirm any new monitoring well(s) installed for this facility are capable of yielding water samples that are representative of the uppermost aquifer water quality at the sampling point. Monitoring system certification shall also confirm all monitoring system components have been constructed and installed in an acceptable manner following appropriate ASTM D 5092 well construction protocols.

34. The permittee shall comply with Regulation 22.1103(a), which requires following construction, each well shall be developed to the degree necessary to restore formation hydraulic conductivity and insure retrieval of samples that are representative of formation ground water quality, at this facility.

Reports of replaced or decommissioned wells shall be submitted to the Department within 60 days of completion and shall be placed in the Operating Record.

35. The permittee shall obtain ground water samples which are representative of water quality passing the relative point of compliance specified in Regulation 22.424(d) for this facility. The down gradient monitoring wells for this facility must be installed at this relative point of compliance.

36. Per Regulation 22, the ground water monitoring frequency at the facility shall be at least semi-annual during the active life of the facility and the post-closure period. A ground water monitoring report will be submitted to the ADEQ within 90 days from the date of each monitoring event. Any newly installed monitoring well or replacement well(s) shall be sampled quarterly for a period of (1) one year to establish water quality conditions in accordance with Regulation 22.1203(e). Wells MW-6R and MW-8 shall be sampled using an alternative frequency of every 18 months. Statistics shall also be performed on MW-6R and MW-8. Water level measurements will be taken during every sampling event.

37. The permittee must establish or have previously established background water quality parameter concentrations in hydraulically up-gradient and/or background well(s) which have not

- been affected by leakage from a landfill unit at this facility, in accordance with Regulation 22.1203(e). If necessary, a minimum of four independent samples from each up-gradient or background well must be collected and analyzed.
- a. During detection monitoring water quality samples from this facility shall be analyzed for Regulation 22, Appendix 1 parameters, chloride, total dissolved solids, sulfate, total organic carbon, pH, specific conductance, iron and manganese [Regulation 22.1204(d)].
  - b. The Director, in accordance with Regulation 22.1204(a)(1) and (2) may delete any Appendix 1 sampling parameter from this detection monitoring program if it can be demonstrated those constituents cannot reasonably be expected to be found in or derived from the waste disposed in the landfill.
38. Each monitoring well shall be sampled by qualified personnel properly trained and familiar with appropriate procedures and techniques for the collection of ground water samples.
- a. Prior to purging the monitor wells, static water level measurements shall be taken, recorded and the data used to determine the rate and direction of ground water flow in the upper most aquifer. Measurements are to be taken from the surveyed benchmark on the top rim of the well casing.
  - b. Sample analysis shall be performed by a laboratory that is properly certified by ADEQ to run the type of analysis required by Regulation 22.
39. Analysis of ground water samples shall be in accordance with the most current version of EPA Report SW-846 Test Methods for Evaluating Solid Waste, Physical/Chemical Methods.
- a. Volatile organic compounds analysis shall be in accordance with Method 8260 while metal analysis shall be in accordance with Method 6010 or a method from the 7000 series or an equivalent. Method detection limits for each parameter must be reported.
  - b. All parameter concentrations that are above the Method Detection Limit (MDL) must be reported.
  - c. The Department may modify the analytical parameters, sampling frequency or the sampling methods required under this permit based on any information received by ADEQ, based on the analytical results received for this facility and/or based on new laboratory techniques which may result in more accurate water quality analysis from samples taken at this facility.
40. The permittee must select a statistical method approved by the Department for evaluating water quality monitoring results for each constituent to determine whether a statistically significant increase (or decrease in the case of pH) occurs for each ground water monitoring constituent in conformance with the requirements of Regulation 22.1203(g)(h) and (i).
41. Ground water monitoring reports shall be submitted to the SWMD. The report shall summarize the results of sampling and include a determination of whether a statistically significant increase over background values has occurred for each constituent required to be analyzed.
- a. Quarterly analytical results shall be submitted directly to the Solid Waste Management Division (SWMD) from the contract laboratory on or before March 31, June 30, September 30, and December 31.

- b. Semi-Annual analytical results shall be submitted directly to the SWMD on or before June 30 and December 31 each year thereafter.
42. The permittee, after initiating a Detection Monitoring Program at this facility, should a statistically significant increase over established background concentration be detected for one or more of the monitored constituents, the permittee must undertake the following actions:
- a. Must, within 14 days of this finding, place a notice in the facility Operating Record indicating which constituents have shown statistically significant increase (SSI) from background levels, and notify the Director that this notice was placed in the operating records; and,
- b. Establish an Assessment Monitoring Program meeting the requirements of Regulation 22.1205 within 90 days except as provided for in Regulation 22.1204(c)(3); or
- c. The permittee may establish an alternate source other than the landfill has caused the contamination or the SSI was the result of a sampling error, laboratory error, statistical error or a natural variation in ground water quality at that location. A report documenting this demonstration must be certified by a qualified ground water scientist or be approved by the Director and be placed in the facilities operating record.
- d. If, after 90 days, the permittee has not provided the Director a successful alternate source demonstration for this facility, as provided for in Regulation 22.1204(c)(3), the permittee must initiate an Assessment Monitoring Program.
43. While a facility is in an Assessment Monitoring Program, if one or more of the assessment monitoring constituents are detected at a statistically significant level exceeding the established Ground Water Protection Standards (GWPS) defined under Regulation 22.1205(h) or (i), the permittee must follow the steps of Regulation 22.1205(g) including initiation of Assessment of Corrective Measures for the facility, in accordance with Regulation 22.1206. Based upon the results of an Assessment of Corrective Measures, the permittee must proceed with Selection of a Remedy in accordance with Regulation 22.1207 and then proceed with Implementation of a Corrective Action Program for the facility in accordance with Regulation 22.1208.

**APPROVED BY:** Arkansas Department of Environmental Quality

5301 Northshore Drive  
North Little Rock, Arkansas 72118

  
For Teresa Marks

May 2, 2012  
Date

CERTIFICATE OF SERVICE

I, Tommi West, hereby certify that a copy of this permit has been mailed by first-class mail to Robert Hendrix, P.E., P.O. Box 16777, Jonesboro, AR 72403, on or before this 3<sup>rd</sup> day of May, 2012.

## Statement of Basis: Permit Modification Application Summary and Rationale

### Craighead County SWDA Class 1 Landfill Permit No. 0254-S1-R4; AFIN No. 16-00923

#### 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.

<b>Permit Application Summary</b>	
Name of Applicant:	Craighead County Solid Waste Disposal Authority
Type of Facility:	Class 1 landfill
Engineering Firm:	Terracon Consultants, Inc. and Northstar Engineering Consultants, Inc.
Application Date:	Submitted on January 12, 2009 with additional submittals.
Site Location	General: The site is located approximately five (5) miles south from Jonesboro on Highway 1, East on County Road 476.  Specific: A part of Section 32 and 33, Township 13 North, Range 4 East, Craighead County, Arkansas.
Permit Area:	Total Property Area: 520.32+ acres Permitted Landfill Area: 297+ acres
Residences Within 2 Miles:	Approximately 627 dwellings within two miles of site as determined from aerial photography dated February 6, 2001.
Water Supplies Within 1/2 Mile:	A number of irrigation and some domestic wells are present within the vicinity of the project site. Water supply for area residents is provided through the Jonesboro City Water and Light public water supply system.
Wetlands:	The property was initially used for agricultural purposes and does not contain any wetland or U.S. water areas.
Geology	According to the GG&H report, the western portion of the site consists of alluvial terrace deposits of Quaternary Age with sand and gravel in the lower portion and silt and clay in the upper portion. Thickness of the clay was noted to be on the order of 17 to 20 feet or to an approximate elevation of 222 to 226 feet. Below the clay, the Quaternary sands with varying silt contents were encountered to an elevation near 120 feet. These sand and some gravel zones comprise the Quaternary Aquifer. The potentiometric surface of the Quaternary Aquifer at the site was found by GG&H to be near elevation 170 feet msl (Terracon). Recently submitted potentiometric maps have the potentiometric surface at the site near elevation 161 feet msl. The groundwater within the area is continuously being drawn down through withdrawal from heavy irrigation pumpage.

### Permit Application Summary

	<p>In the eastern portion of the site (western edge of Crowley's Ridge), deposits of the Upper Claiborne Group are present at or near the ground surface. The Upper Claiborne consists of clay with occasional sand layers and lenses (GG&amp;H).</p> <p>Below the Quaternary alluvial deposits, the Tertiary Age Claiborne Group was encountered during the GG&amp;H investigation. The Upper Claiborne deposits consist of clay with some lenses of fine sand. Sands associated with the Memphis aquifer underlie the Upper Claiborne Group deposits (Terracon).</p> <p>(ADEQ Documents 34657, 34655, 34818, 308, and 61939 contain pre-site memorandum, geotechnical, hydrogeologic, seismic assessment, and monitoring well and gas logs.)</p>
<p>Soils:</p>	<p>Typically, Crowley's Ridge is capped by loess which is variable in thickness. Below the loess is a fluviually deposited sand and gravel unit which averages to 30 feet in thickness. Unconformably below the sand and gravel is the Eocene Aged Claiborne Group (Memorandum by Tony Morris).</p> <p>There is a transition zone of deposition between Crowley's Ridge and the alluvial terrace. Within this zone, the soils are generally more silty with some sands and gravels. The silt soils are predominantly outwash from the loess formerly present at the top of the ridge. The sands and gravels are outwash from the Quaternary sands and gravels present at higher elevation on the ridge (GG&amp;H 1994).</p> <p>In the eastern portion of the site (western edge of Crowley's Ridge), deposits of the Tertiary Age upper Claiborne Group are present at or near the ground surface. The upper Claiborne is predominantly clay with some lenses of fine sand (GG&amp;H 1994).</p> <p>In the western portion of the site, the surficial deposits are composed primarily of alluvial terrace units of Quaternary Age. These alluvial deposits typically grade from sand with gravel in the lower portion to silt and clay in the upper portion (GG&amp;H 1994).</p>
<p>Ground Water/Hydrogeology</p>	<p>According to the GG&amp;H report a number of irrigation and some domestic wells are present within the vicinity of the project site. These wells generally extend to depths of 100 to 150 feet to the base of the Quaternary aquifer. Irrigation well capacities in the area range from approximately 600 to 1500 gallons per minute with an average yield of near 1000 gallons per minute. Due to extensive groundwater withdrawal for irrigation in the area, only the lower portion of the aquifer is saturated. The approximate saturated thickness is in the order of 50 feet. The saturated zone is primarily within the cleaner sands and gravels. According to the recently submitted potentiometric maps by Terracon, the potentiometric surface at the site is near elevation 161 feet msl. Groundwater flow within the alluvium is to the south and southwest.</p> <p>The Claiborne group contains a massively bedded sand known as the Memphis aquifer, which provides large quantities of good quality water.</p> <p>The Quaternary aquifer is underlain by deposits of the Tertiary Age Claiborne Group. The Upper Claiborne is predominantly clay with some lenses of fine</p>

### Permit Application Summary

	<p>sand. The Memphis Sand aquifer underlies the Upper Claiborne and consists of fine to medium sand with some clay interbedding (GG&amp;H 1994).</p> <p>Cell 4 was excavated into the sand. Due to extensive groundwater withdrawal for crop irrigation in this highly agricultural region, only the lower portion of the aquifer is saturated, primarily within the cleaner sands and gravels. The base grade of the landfill and the top of the clay was shown on previous plans and should be updated and submitted with all future modifications or cell construction at the landfill. ADEQ recommends that future cells should keep at least a minimum of five foot separation distance between the top of the landfill liner system to the top of the aquifer sand to help avoid potential groundwater contamination and landfill gas migration. An updated geologic/hydrogeological report will be required with future major modification requests.</p>
Surface Drainage Sequence:	The upland areas in the eastern portion of the site (western side of Crowley's Ridge) drain through a series of relatively small drainage ditches which cross the lowland portions to the west and southwest. After leaving the site, the surface drainage generally passes through the Mulligan Lateral ditch located southwest of the site. The Mulligan Lateral then empties into the L'Anguille River in Poinsett County on the western edge of Crowley's Ridge.
Waste Streams:	Class 1 and Class 4 Municipal Solid Waste as defined in Arkansas Regulation 22.
Capacity:	Total Capacity = 7,005,273 cubic yards (includes pre-Subtitle D cells 1-3)
Disposal Rate	228,028 cubic yards per year (approximately may vary)
Projected Active Life after this modification	16.3 years (approximately, will vary with waste received)
Bottom Liner System:	60 mil textured HDPE flexible membrane liner and a minimum of twenty-four inches of compacted clay exhibiting a maximum hydraulic conductivity of $1 \times 10^{-7}$ centimeters per second (cm/s).
Final Cover:	Consists of an intermediate soil cover, 18 inch clay liner with hydraulic conductivity of $1 \times 10^{-7}$ 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.

### Permit Rationale

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

- Permit Pre-Application dated August 22, 2006.
- Permit Application dated January 12, 2009. The application was later completed through documents furnished on February 18, 2010, March 23, 2010, March 30, 2010, May 10, 2010, June 4, 2010, August 23, 2010, September 2, 2010, November 4, 2010, December 7, 2010, October 4, 2011, and March 8, 2012.
- Correspondence from the Permittee; The Arkansas Solid Waste Management Code, as Amended (Regulation Number 22); and all other applicable rules and regulations of the APC&EC.

Condition No.	Permit Conditions
1	Concerns the expiration of the permit. The permit will expire when the facility is filled to permit capacity and the facility will be closed out in accordance with Regulation 22 and the approved Closure Plan.
2	Specifies the initial amount of financial assurance and limits the maximum acreage allowed to be open per the approved Closure Plan. (Regulations 22.1402 and 22.1403).
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 and fill progression 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 all 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.

Condition No.	Permit Conditions
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.
18	Concerns the payment of annual fees and quarterly fees associated with the permit in accordance with Regulation 9 and Regulation 11. 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. The facility is not permitted for a liquid bulking operation. Exemptions are provided in Reg.22.420.
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. This permit condition authorizes the use of synthetic film as alternate daily cover.
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	This permit condition prohibits leachate recirculation without prior approval from the Department. Leachate management and disposal must meet requirements of 22.429(k). Leachate screening and monitoring shall follow the requirements of Regulation 22.429(l) and reporting requirements of 22.421(f).

Condition No.	Permit Conditions
29	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.
30	This permit condition concerns the submittal of annual engineering inspections reports as specified by Regulation 22.423.
31	Specifies that any statements in the operational narrative, specifications, ground water sampling and analysis plan, and engineering plans that conflict with Regulation 22, permit conditions, or other applicable laws and regulations shall not be considered authorized by the Department.
32	The ground water monitoring program at the site shall follow the provisions of Regulation 22. Requires the permittee to utilize and maintain a ground water monitoring system to adequately monitor potential impacts on local ground water supplies from facility operations. The monitoring system must have a sufficient number of wells or sampling points that will yield water samples representative of the water quality around the landfill. References the proposed well identification numbers and well locations for this facility (Regulation 22.1202(a)). The facility must follow an approved groundwater sampling and analysis plan that complies with Regulation 22.1203.
33	Requires the permittee to certify the new and/or existing ground water monitoring system at this facility (Regulation 22.1202(e)). Requires the ground water monitoring system to be installed according to appropriate ASTM standards (Regulation 22.1202(c)) and the monitoring system be certified as adequate and properly constructed given the geologic conditions of the site by a Registered Professional Geologist. (Regulation 22.1202)
34	Requires the permittee to following monitor well installation to re-establish hydraulic conductivity to insure retrieved water samples are representative of formation ground water quality at this site. Requires the permittee to insure the ground water monitoring wells are capable of providing samples that are within the maximum allowable ranges for water clarity or turbidity. If turbidity-free samples from a well cannot be obtained, the permittee may need to redevelop the monitoring well, replace the well or provide justification the turbidity ranges shown are representative of ambient water quality in the formation (Regulation 22.1103(a)). Requires reporting of replaced or decommissioned wells.
35	Requires the permittee to place downgradient monitor wells at the relative point of compliance from the waste mass (within 150 meters and on land owned by the municipal solid waste landfill unit) (Regulation 22.1202(a)(2)).
36	Requires the permittee for any newly installed monitoring well to sample quarterly for a period of one year in accordance with (Regulation 22.1203(e)). Thereafter, any new and/or existing wells in the ground water monitoring system are to be sampled semi-annual. (Note: wells MW-6R and MW-8 will be sampled using an alternative frequency of every 18 months. Statistics will still be performed on these wells. Water level measurements will be taken during every sampling event.)

Condition No.	Permit Conditions
37	Requires the permittee to establish or previously have established background water quality parameter concentrations in hydraulically up-gradient wells and/or background wells which have not been affected by leakage from a landfill unit at this facility (Regulation 22.1203(e)). In detection monitoring, requires up-gradient and downgradient wells to be sampled from Regulation 22, Appendix 1 parameters, chloride, total dissolved solids, sulfate, total organic carbon, pH, specific conductance, iron and manganese (Regulation 22.1204(d)). The Director may designate an alternate list of parameters in accordance with (Regulation 22.1204(a)(2)).
38	Requires the permittee to have qualified personnel trained in the proper sampling and measuring techniques take water samples. Water level measurements must be taken prior to purging and sampling the monitoring wells, and uses the resulting data to determine the rate and direction of ground water flow in and around the facility. The samples analysis shall be performed by a lab certified by ADEQ (Regulation 22.1203).
39	Requires the permittee to analyze ground water samples in accordance with EPA Report SW846 or an equivalent methodology. Parameter concentrations above the MDL must be reported. The Department reserves the right to modify the GWM sampling program based on any information received (Regulation 22.1204).
40	The permittee must select a statistical method approved by the Department for evaluating GWM data in conformance with the requirements of Regulation 22.1203(g)(h) and (i).
41	Requires the facility to submit ground water monitoring reports. Requires the permittee to submit analytical reports to ADEQ on specific dates.
42	Requires the permittee to submit for review and approval a statistical evaluation package to determine statistically significant increases have occurred during the Detection Monitoring Program, over established background water quality standards (Regulation 22.1203(g)). Requires the permittee if necessary, to establish an Assessment Monitoring Program and outlines the procedures for initiating an Assessment Monitoring Program at the facility, if warranted (Regulation 22.1204(c)(3)) and Regulation 22.1205.
43	Requires a facility in Assessment Monitoring to determine if assessment monitoring constituents have been detected at a statistically significant level exceeding the established Ground Water Protection Standards. If a statistically significant level exceeding the Ground Water Protection Standards has occurred the permittee must follow steps of Regulation 22.1205(g) and initiate an Assessment of Corrective Measures at this facility. The permittee must then provide a Selection of Remedy and proceed with the Implementation of a Corrective Action Program for this facility. This condition allows ADEQ to address potential water quality impacts on human health and the environment in a timely manner. (Regulation 22.1205(g), Regulation 22.1205(h) or (i); Regulation 22.1206; Regulation 22.1207 and 22.1208).

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# ADEQ

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

January 15, 2016

Craighead County SWDA  
Attn: Mr. Robert Hendrix  
P.O. Box 16777  
Jonesboro, AR 72403-6777

**RE: Approval of Minor Permit Modification and Transmittal of Permit Addendum  
Craighead County SWDA Class 1 Landfill  
Permit Number: 0254-S1-R4; AFIN: 16-00199  
Document Number: 68756; Cross Reference Numbers: 66769, 68483, 68640, 68667**

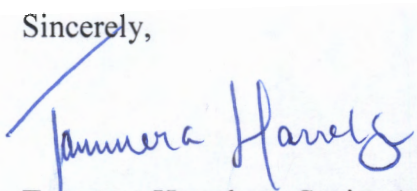
Dear Mr. Hendrix:

ADEQ – Office of Land Resources has received and reviewed a minor permit modification application regarding the revised final cover configuration and updated Closure Plan and Post-Closure Care Plans. 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 CCSWDA Class 1 Landfill harmless in the event of any adverse environmental or public health conditions resulting from this authorization. CCSWDA 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 the permitting staff at 682-0601 should you have any questions regarding the above information.

Sincerely,



Tammara Harrelson, Senior Associate Director  
Office of Land Resources

cc: OLR - Baker, Love, S. McWilliams, Matoska, Leamons, Hynum  
Paul Crawford, FTN Associates, Ltd.

Enclosures: Addendum to Permit, Statement of Basis/Rationale for Permit Conditions

# ADDENDUM TO PERMIT

ISSUED BY:

STATE OF ARKANSAS

DEPARTMENT OF ENVIRONMENTAL QUALITY

OFFICE OF LAND RESOURCES

<b>Landfill Name</b>	<b>AFIN:</b>	<b>16-00199</b>
<b>Craighead County SWDA Class 1 Landfill</b>	<b>Permit No:</b>	<b>254-S1-R4</b>
<b>Application reference</b>	<b>Description of Addendum to Permit</b>	
Document # 67769, 68483,68640 and 68667	<p>This permit modification is to revise the final cover configuration and update the Closure Plan and Post-Closure Care Plan.</p> <p>The change includes removing the valley in the middle of the landfill; changing the final slope of the northern half of the landfill from 3:1 to 4:1 and removing the terraces; and lowering the final elevation of the northern half of the landfill.</p> <p>No capacity increase, change in estimated site-life, or change in waste unit boundary is permitted by this minor modification.</p>	
<b>Revised Permit Conditions</b>		
9.	<p>The permittee shall implement the Construction Quality Assurance Plan presented in Solid Waste Management Division Document Identifier 68483. 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.</p>	
10	<p>The permittee shall implement the Closure and Post Closure Care Plan presented in Solid Waste Management Division Document ID #66769. 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 from the date the Department accepts closure of the facility. The length of the post closure period may be decreased or increased by the Director in accordance with Reg.22.1302(c)(4). Closure Certification Reports for final cover construction shall be submitted in accordance with Reg.22.1301 and in accordance with the approved Closure Plan.</p>	

17.	The following are modified permit plans for the facility are as follows:	
	<b>Progression of Fill Plan</b>	Figures 2.2, 2.3 and 2.4 Document ID #66769
	<b>Stormwater Management Plan</b>	Drawing 3 of 14 Document ID #61020; also see <b>Progressions of Fill Plan and Final Cover Plan</b>
	<b>Gas Management Plan</b>	Drawings 4 and 4A of Document ID #61020
	<b>Details</b>	Drawings 9 through 13, Document ID #61020
	<b>Final Cover Details</b>	Figure 2.6 Document ID #66769
	<b>Leachate System Details</b>	Sheet 14 of 14 Document ID #61020
	<b>Final Cover Plan</b>	Figure 2.5 Document ID #68640
	<b>Cross Sections A-A thru F-F</b>	Figures 1-4 Document ID #68640
	<b>Bottom Liner Grading Plan</b>	Drawing 1 of 14 Document ID #61020

Revised Permit Conditions 9, 10, and 17 of this addendum replace previous conditions of the same number.

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

Tamera Harrelson, Senior Associate Director  
 Office of Land Resources

1-14-2016

Date

CERTIFICATE OF SERVICE

I hereby certify that a copy of the aforementioned permit has been mailed by first-class mail to Mr. Robert Hendrix, P.O. Box 16777, Jonesboro, AR 72403-6777.

Certified by Tamera Taylor on or before this 15th day of January, 2016.

**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/revised conditions presented in this modification.

9.	This condition establishes the modified CQA Plan for the facility and requires review of construction documents prior to all construction events in accordance with Reg.22.428.
10.	This condition establishes the modified Closure and Post-Closure Care Plan for the facility as required by Regulation 22.1301 and 22.1302.
17.	This condition details the approved landfill plans for the facility as proposed by the applicant. Any changes to the plans listed will require a modification to the facility permit. Plans were reviewed under technical and regulatory standards for Class 1 landfill as found in Reg. 22, Chapter 4.

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