

Haley Griffith (adpce.ad)

Subject: RE: Albemarle South Plant - 0175-S (SPLF) 2024 AEIR issues

From: Zarker, Douglas <Doug.Zarker@aecom.com>

Sent: Monday, August 4, 2025 3:04 PM

To: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>

Cc: Stephen Stamps <stephen.stamps@albemarle.com>; Christ, Scott <scott.christ@aecom.com>;
kimberly.clark@albemarle.com

Subject: RE: Albemarle South Plant - 0175-S (SPLF) 2024 AEIR issues

Richard,

Please see our responses in italicized *red text* below.

Please let us know if any other comments or questions,

Thanks,

Doug Zarker, PG

Senior Project Manager/Geologist

D 512.457.7747 M 512.585.2143

Internal Cisco 240.7747

doug.zarker@aecom.com

AECOM

13640 Briarwick Drive

Austin, TX 78729, United States

T +1-512-454-4797

www.aecom.com

From: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>

Sent: Monday, July 28, 2025 10:13 AM

To: Zarker, Douglas <Doug.Zarker@aecom.com>

Subject: Albemarle South Plant - 0175-S (SPLF) 2024 AEIR issues

Here is what we talked about.

1) Section should the 12.78 found in 8e and 10c be 12.74. *AECOM revised Item 8e and Item 10c of the AEIR from 12.78 acres to 12.74 acres. See attached revised page 3 of 5 and revised page 4 of 5 of the 2024 AEIR.*

2) Section 10a be the size of the facility not the landfill. *The total acreage of the south plant facility is approximately 135 acres. See attached revised page 4 of 5 of the 2024 AEIR.*

3) Section 12b there is a Hazardous waste permitting section not division. *AECOM revised Item 12b of the AEIR from "Hazardous Waste Division" to "Hazardous Waste Permitting Section". See attached revised page 4 of 5 of the 2024 AEIR.*

- 4) Why are the GW reports not attached and they do not need to attach the leachate report if they submit it separately (just give me the Doc IDs for these 3 reports). Please note I cannot find the GW reports in PDS. *The 2024 Annual GW report with the laboratory analytical results were uploaded to the ADEQ ePortal System on 2-28-2025 (Submission HQA- R7FN-Y5P1Q). See attached email acknowledging receipt from David Gillespie. Attachment C of the 2024 AEIR has been updated accordingly so that future submittals will not need to include all of the same laboratory analytical data since it was previously submitted with the 2024 Annual GW Report.*
- 5) What is the debris in photos no. 9, 10, and 13. *The debris in the pictures is the old incinerator foundation and structure (photos 10 & 13). The items visible in photo 9 is the metal cycling area where Albemarle stages all metal in roll-offs for the recycler that they use to pick up from the plant site.*
- 6) Drop Attachment E since no Closure plan was attached. *Attachment E has been removed from the document. Future submittals will not include an Attachment E unless a closure plan is submitted.*

Richard Bennett | Engineer, PE

Regulated Waste Operations

Division of Environmental Quality | Office of Land Resources

5301 Northshore Drive | North Little Rock, AR 72118

t: 501.682.0861 | e:richard.bennett@arkansas.gov



ARKANSAS
ENERGY & ENVIRONMENT

Zarker, Douglas

From: David Gillespie (adpce.ad) <David.Gillespie@arkansas.gov>
Sent: Friday, February 28, 2025 3:28 PM
To: Zarker, Douglas
Subject: RE: Submission of Albemarle-South 2024 Annual Groundwater Monitoring Report

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Doug,

Thanks for the email. I'll check with DEQ's ePortal folks if I don't receive notification of receiving the report and attachment within the next few days.

Thanks again,

David

From: Zarker, Douglas <Doug.Zarker@aecom.com>
Sent: Friday, February 28, 2025 3:21 PM
To: David Gillespie (adpce.ad) <David.Gillespie@adeq.state.ar.us>
Cc: gwreports@adeq.state.ar.us; Stephen Stamps <Stephen.Stamps@albemarle.com>; kurt.allen@albemarle.com; Trey Fortenberry <trey.fortenberry@albemarle.com>; Dupree, Chad <chad.dupree@aecom.com>; Heitzmann, Cory <Cory.Heitzmann@aecom.com>
Subject: Submission of Albemarle-South 2024 Annual Groundwater Monitoring Report

Dear ADEQ, Mr. Gillispie;

On behalf of the Albemarle Corporation, please find attached the 2024 Annual Groundwater Monitoring Report for the Albemarle South Plant in Magnolia, Arkansas.

I have also uploaded the attached documents via the ADEQ ePortal System (Submission HQA-R7FN-Y5P1Q). Please let us know if there are any problems accessing the report.

Please do not hesitate to contact us should you require further clarifications or have questions during your review of the document.

Thank you,
Doug

Doug Zarker, PG
Project Manager/Geologist
D 512.457.7747 M 512.585.2143
Internal Cisco 240.7747

6	22.423(b)(6) 22.522(a)(6) 22.619(b)(6)	Quantity, location, and characteristics of leachate collected, recirculated, and disposed. Note: Provide analytical report as Attachment C. Provide brief narrative on this form in space provided about leachate sources, how leachate is collected, measured and disposed. Also, explain how the leachate head on the landfill liner is monitored and measured.	a) Leachate Collected: <u>5,047,980</u> gallons b) Leachate Disposed: <u>5,047,980</u> gallons c) Leachate Recirculated: <u>0</u> gallons d) Leachate Recirculation Plan exists (Y/N)? <u>N</u> ADEQ approval Doc # <u>N/A</u> e) Leachate operating records exist (Y/N)? <u>Y</u> f) Leachate analytical report attached (Y/N)? <u>Y</u> g) Leachate narrative (collection, measurements and disposal): <u>Leachate is collected from the plant-wide perimeter French drain and in-cell dewatering sump pump. Both sources drain to Sump 13. From Sump 13 leachate is pumped to the facility wastewater treatment system. The analytical reports may show constituents not attributable to the landfill, since the drain collects subsurface water from other areas of the plant. Sumps 4 and 13 are in the vicinity of the landfill.</u> h) Leachate narrative (verifying <1' head on liner system): <u>A temporary sump pump operates and pumps stormwater and leachate to collection Sump 13 through dual wall HDPE piping.</u>	C
7	22.423(b)(7) 22.522(a)(7) 22.619(b)(7)	Maintenance of stormwater controls and best management practices for erosion control. Note: List any upset conditions during the reporting period (i.e., washouts, etc...). Also, include narrative about vegetation maintenance and repair.	a) Briefly list maintenance activities and upset conditions here: <u>Stormwater within the constructed area is collected and transferred to the facility wastewater treatment system. Maintenance is performed when necessary to maintain compliance with ADEQ regulations.</u>	
8	22.423(b)(8) 22.619(b)(8)	Status of capping and closure of completed areas. Note: List areas with acreage that have received interim or final cover. Include total landfilled area acreage not yet under final certified closed cover. Note: "Certified closed" means the facility has received an approval letter from ADEQ accepting the engineer's closure certification report. <u>Permitted Units - Areas I, II, III, and IV (14.12 acres)</u> <u>Currently 12.78 acres constructed.</u> <u>Phase 2 of Area IV (1.34 acres) is not constructed.</u> <u>Phase 1 of Area IV (1.64 acres) ~ 1.61 acres is filled & covered and ~ 0.03 acres is open.</u>	a) Lndfl unit/cell <u>Areas I, II, and III</u> , <u>11.14</u> acres. Intrm or Final Cover (I/F): <u>Interim Cover</u> b) Lndfl unit/cell <u>Phase 1 of Area IV</u> , <u>1.6</u> acres. Intrm or Final Cover (I/F): <u>Interim Cover</u> c) Lndfl unit/cell _____, _____ acres. Intrm or Final Cover (I/F): _____ d) Lndfl unit/cell _____, _____ acres. Intrm or Final Cover (I/F): _____ e) Acres of disposed waste not under final certified cover: <u>12.74</u> acres f) Acres of disposed waste area that have interim cover: <u>12.74</u> acres	
9	22.423(b)(9) 22.522(a)(8) 22.619(b)(9)	Status of remedial or corrective action activities. Note: List corrective action events during reporting period (e.g., seeps and erosion correction, leachate spills, unauthorized waste handling and removal, etc...), and indicate whether action was taken in response to an ADEQ inspection.	a) Briefly list corrective actions events here: <u>Top soil was brought in and hydroseeded in areas that lacked grass as needed.</u> b) Were any of the corrective actions taken in response to an ADEQ inspection (Y/N)? <u>N</u> c) Current status of corrective actions: <u>Complete</u> d) Did corrective actions permanently solve the conditions (Y/N)? <u>Y</u> Explain briefly: <u>Ongoing maintenance and inspections.</u>	

10	22.423(b)(10) 22.522(a)(9) 22.619(b)(10)	<p>Updated Financial Assurance documentation as required by Chapter 14.</p> <p>Note: Include copy of most recent financial assurance documentation as Attachment D. Also, include updated closure and post closure cost estimated as an attachment– recommend to use the Closure Costs and Post-closure Care Costs Worksheet located at ADEQ - Solid Waste - Technical Branch Home Page</p> <p>Specific links to the worksheets: http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/closure_costs_worksheet.xlsx and http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/post_closure_care_costs_worksheet.xlsx. . Show detailed calculations of cost items in tabular format with specific item breakdowns. Also, show source of unit cost information and/or inflationary factor adjustments – use ADEQ factors where applicable. If updated unit cost information is used instead of inflationary factors, show the source of unit cost information. Confirm estimates are based on largest area ever requiring final cover.</p>	<p>a) Size of the facility property under current permit? <u>approx. 135</u> acres</p> <p>b) Size of actual permitted disposal area? <u>14.12</u> acres</p> <p>c) What is the current total permitted disposal area that contains disposed waste but is not certified closed? <u>12.74</u> acres</p> <p>d) Updated closure cost estimate amount: \$ <u>1,812,816</u></p> <p>e) Is the closure cost estimate based on the largest area ever requiring closure (Y/N)? <u>Y</u></p> <p>f) Is the existing closure financial assurance adequate for acreage not yet certified closed (Y/N)? <u>Y</u></p> <p>g) Updated post closure care cost estimate amount: \$ <u>441,308</u></p> <p>h) Is the existing post closure care financial assurance adequate for all permitted areas (Y/N)? <u>Y</u></p> <p>i) Is the financial assurance mechanism a trust fund (Y/N)? <u>N</u></p> <p>j) Are the sources of information for updated unit cost line items shown on the cost estimate calculations (Y/N)? <u>N/A</u></p> <p>k) Do the unit cost items for soil cover material include actual third party cost of materials and labor (Y/N)? <u>Y</u> <u>These 2024 costs were inflated as shown in Attachment D and the 2024 costs were priced using off-site sourced materials with volume calculated to cover the entire landfill, and therefore, a soil balance of the active working area is not required.</u></p>	D
11	22.423(b)(11) 22.522(a)(10) 22.619(b)(11)	<p>Revised or updated facility Closure Plan in accordance with Chapter 13.</p> <p>Note: Provide updated Closure Plan as Attachment E if facility obtained a permit modification during the reporting period that affects the closure and/or post closure care.</p>	<p>a) Was an updated Closure Plan required during this reporting period (Y/N)? <u>N</u></p> <p>b) Is an updated Closure Plan attached herein (Y/N)? <u>N</u> (Attachment E not needed).</p>	
12	22.423(b)(12) 22.522(a)(11) 22.619(b)(12)	<p>Other items that affect compliance.</p> <p>Note: Include an ADEQ enforcement activity summary (solid waste, water, air, hazardous waste related) and , status of operating and permit fees. Also, include brief narrative concerning groundwater monitoring reports, landfill gas, leachate recirculation, alternate daily cover, etc...</p>	<p>a) Are there current ADEQ enforcement actions (Y/N)? <u>Y</u></p> <p>b) Summary of enforcement actions: <u>The landfill is included in a plant-wide response to an order under jurisdiction of the Hazardous Waste Permitting Section.</u></p> <p>c) Are operating and permit fees payments up-to-date (Y/N) ? <u>Y</u> If not explain: _____ _____</p> <p>Additional Information:</p> <p>d) Does the facility monitor groundwater (Y/N)? <u>Y</u> If so, is it detection monitoring or assessment monitoring?: <u>Detection Monitoring</u></p> <p>e) What is the groundwater analytical sampling frequency? <u>6</u> months</p> <p>f) Does the facility collect landfill gas (Y/N)? <u>N</u></p>	