

Haley Griffith (adpce.ad)

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

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

Sent: Thursday, August 14, 2025 4:28 PM

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

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

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

Richard,

Please see the final response to your previous comments based on our recent telephone conversation earlier today.

Please let us know if any other questions,

Thanks,

Doug Zarker, PG

Senior Project Manager/Geologist

D 512.457.7747 M 512.585.2143

Internal Cisco 240.7747

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

Sent: Thursday, August 14, 2025 2:01 PM

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

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

yes

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

Sent: Thursday, August 14, 2025 1:58 PM

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

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

Are you available now? I can call you if so...

From: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>
Sent: Thursday, August 14, 2025 9:29 AM
To: Zarker, Douglas <Doug.Zarker@aecom.com>
Subject: RE: Albemarle South Plant - 0175-S (SPLF) 2024 AEIR issues

Lets talk this afternoon.

From: Zarker, Douglas <Doug.Zarker@aecom.com>
Sent: Thursday, August 14, 2025 8:01 AM
To: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>
Subject: RE: Albemarle South Plant - 0175-S (SPLF) 2024 AEIR issues

Richard,

Item 12 is asking to “include an ADEQ enforcement activity summary (solid waste, water, air, hazardous waste related)” ; Let me know if you agree to following edit on the form.

		<i>if facility obtained a <u>permit</u> modification during reporting period that affects the closure and/or closure care.</i>
12	22.423(b)(12) 22.522(a)(11) 22.619(b)(12)	Other items that affect compliance. <i>Note: Include an <u>ADEQ</u> enforcement activity summary (solid waste, water, air, hazardous waste related) and , status of operating and permit fees. Also, include brief <u>narrative concerning</u> groundwater monitoring reports, landfill gas, leachate recirculation, alternate daily cover, etc...</i>

I can send you the revised page but I will need to re-edit the entire form in Word since PDF is not allowing me to make changes.

We can discuss later today if you are available....

From: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>
Sent: Thursday, August 7, 2025 3:26 PM
To: Zarker, Douglas <Doug.Zarker@aecom.com>
Subject: RE: Albemarle South Plant - 0175-S (SPLF) 2024 AEIR issues

This GW report is for the Hazardous Waste CAO, not for solid waste permit, this permit does not require GW monitoring. Please send me an email saying you agree and revise page 4 of 5 of the AEIR to say there is no GW monitoring..

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

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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


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ENERGY & ENVIRONMENT

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.adeg.state.ar.us/solwaste/branch_technical/pdfs/closure_costs_worksheet.xlsx and http://www.adeg.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></p> <p>If not explain: <u>Additional Information: Albemarle conducts semi-annual sampling of its groundwater monitoring well network and groundwater interceptor trench (GIT) sumps to determine the effectiveness of the corrective measures at the South Plant (as outlined in Section 11 of the RADD dated 1-19-2016 and administered by the Hazardous Waste Permitting Section as part of the CAO). These analytical data are summarized and reported to the ADEQ in annual groundwater monitoring reports. The permit for the south plant landfill does not require groundwater monitoring as part of its operation and maintenance.</u></p>	

			<p>d) Does the facility monitor groundwater (Y/N)?: <u> N </u> If so, is it detection monitoring or assessment monitoring?: <u> NA </u></p> <p>e) What is the groundwater analytical sampling frequency? <u> NA </u> months</p> <p>f) Does the facility collect landfill gas (Y/N)?: <u> N </u></p> <p>g) Does the facility have a Gas Monitoring Plan (Y/N)? <u> N </u></p> <p>h) Does the facility have gas monitoring probes (Y/N)? <u> N </u></p> <p>i) Does the facility use an alternate daily cover (ADC)(Y/N)? <u> N </u> If so, what type of ADC is used: <u> N/A </u> If so, list document id# approving ADC: <u> </u></p> <p>j) Does the facility have a Liquid Waste Management (LWM) Plan (Y/N)? <u> N </u> If so, list document id# approving the LWM Plan: <u> N/A </u></p> <p>k) Date and document id # of currently approved Operating Plan and Narrative: Date: <u> February 16, 1981 </u> Doc#: <u> 27851 </u></p> <p>l) Date and document id # for currently approved Closure/ Post Closure Plan: Date: <u> February 16, 1981 </u> Doc#: <u> 27851 </u></p> <p>m) Date and document id # of currently approved Permit Drawings: Date: <u> February 2, 1981 </u> Doc#: <u> 28301 </u></p> <p>n) Date and document id # of currently approved Design Narrative: Date: <u> February 16, 1981 </u> Doc#: <u> 27851 </u></p> <p>o) Are weigh scales utilized at the landfill (Y/N)? <u> N </u></p> <p>p) Does the final cap include a synthetic liner (Y/N)? <u> N </u></p> <p>q) Does the final cap include clay liner (Y/N)? <u> Y </u></p> <p>r) Total current permitted landfill volume: <u> 110,002.86 </u> cubic yards</p>	
13	22.423(b) 22.522(a) 22.619(b)	Certification of AEIR Report: "I have inspected the landfill site and have prepared this report to reflect operational compliance with permit conditions, permit plans, specifications, narrative, and all applicable regulations"	<p>a) Arkansas Licensed Engineer: Brian H. Sullivan, PE</p> <p>Sign: </p> <p>Date: <u> July 08, 2025 </u></p> <p>b) License Number: <u> 17461 </u></p> <p>c) <i>Attach seal here:</i></p> 