



ARKANSAS  
Department of Environmental Quality

November 16, 2007

Misty Micenhamer, Operation Director  
City of Jonesboro  
515 W Washington Ave  
Jonesboro, AR 72401

RE: Gas Mitigation System

Dear Ms. Micenhamer:

You have requested a letter from ADEQ stating that the Gas Mitigation System the City of Jonesboro is installing is voluntary on the City's part. Arkansas Pollution Control and Ecology Regulation 22.415(2)(d) mandated the City of Jonesboro to implement a Remedial Action Work Plan for methane gas releases. The City chose to implement a Remedial Action Work Plan that included a gas mitigation System to correct the methane problem. The City submitted this plan and has implemented it as required by an APC&EC Regulation.

Three separate site assessments of property adjacent to the Jonesboro Class 4 landfill confirmed the presence of methane gas. This monitoring was conducted to ascertain compliance with Regulation 22.415 Explosive Gas Control. Regulation 22.415 requires that the concentration of methane gas generated by a landfill not exceed 25% of the lower explosive limit (LEL) for methane at the facility boundary. The studies revealed the presence of methane gas at 100% LEL, beyond the Class 4 landfill property boundary.

A memorandum dated October 14, 2005 which discusses the landfill gas migration assessment and a copy of a letter addressed to Ralph C. Ohm, APERMA Legal Defense Group, dated May 19, 2005, which discusses the studies findings and regulatory requirements are enclosed. These documents explain why the City had to implement a Remedial Action Work Plan.

Sincerely,

A handwritten signature in cursive script that reads "Teresa Marks".

Teresa Marks  
Director