



July 27, 2015

Mr. Tom Holte
Green Bay Packaging, Inc.
Arkansas Kraft Division
PO Box 711
Morrilton, AR 72110

RE: Quarterly Inspection; AFIN 15-00001; Permit Number 0284-S3N

Dear Mr. Holte:

On July 23, 2015, I conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Regulation 22, and the above-referenced permit. A copy of the inspection report is enclosed for your records.

Please refer to the attached inspection report to note the specific allegations. A written response for the noted allegations, describing the corrective action taken or to be taken, must be submitted to my attention at the address listed below within thirty (30) days from the date hereof. Failure to submit the written response shall be construed as an admission of any allegations. Any items noted that are neglected and/or persistent may warrant formal enforcement action.

If I can be of any further assistance, feel free to contact me at 501-682-0599 or stringer@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Stringer", is written over a horizontal line.

Charles Stringer
ADEQ Inspector
Solid Waste Management Division

Attachment



Arkansas Department of Environmental Quality

Solid Waste Management Division

Class 3 Landfill Inspection



Site Name	Green Bay Packaging, Inc., Arkansas Kraft Division	County	Conway	AFIN	15-00001
Facility Address	Morrilton, Hwy 9 S. to Hwy 133 S. to the Facility	Phone Number	501-354-9289	Permit Number	0284-S3N
Permittee Address	PO Box 711, Morrilton, AR 72110	E-Mail Address		PDS #	085483
Date	7/23/2015	Entry Time	1310	Exit Time	1425

Regulation 22 – Operational Standards

Category 1

	Regulation	Item Description	Comments
	510(l)	Adequate employee facilities	
	520(a)(b)	Record keeping meets requirements specified by regulations	
	516	Access requirements	
	510(j)	Adequate provisions for backup equipment	
	520(c)	Waste receipt records, ticket system maintained	
	510(k)	Telephone system & written emergency response plan on site	
	522(a)	Annual compliance inspection by register professional engineer	
	521	Facility implements operating plan and narrative	
	520(a)(4)	Leachate disposal/recirculation records	
	701, 520(a)(2)	Special waste disposal and procedures records	

Category 2

	Regulation	Item Description	Comments
	510(a)	Operations in accordance with permit documents	
	516(c)	Adequate all weather operational roads	
	510(c)	Smallest practical area, unloading supervised, single working face	
	510(e)	Salvage operations meet approved conditions	
	510(f)(l)	Scavenging of waste prohibited	
	510(o)	Proper wet weather repairs	
	510(b)	Operations by licensed on-site personnel at all times	
	510(d)	Waste spread and compacted as unloaded	
	510(g)	Litter control provisions maintained	
	513(a)	Disease vectors controlled	

Category 2 (continued)


	Regulation	Item Description	Comments
	518	Surface water controls	
	510(h)(l)	Contouring prevents surface water flowing into or through waste	
	517(a)(b)	Run-on/off control system present and adequate	
	510(h)(2)	Surface water control prevents off-site sediment accumulation	
	510(h)(i)	Adequate maintenance of intermediate/final cover vegetation	
	514	Gas monitoring program	
X	510(n)	Leachate leaks or evidence of leachate seepage	See Category 2 Comments
	526	Survey controls	
	529	Leachate collection system	See Category 2 Comments
	519	Liquid restrictions	

Category 3

	Regulation	Item Description	Comments
	511	Implementation of hazardous/unauthorized waste exclusion plan	
	512(a)(c)	Satisfactory daily/alternative cover	
	512(b)	Satisfactory intermediate cover	
	515(b), 510(f)(4)	Open burning prohibited	
	518	Cause discharge/leachate discharge leaving landfill	
	510(f)(3), 518(a)(4)	Depositing waste in standing water prohibited	
	510(n)	Erosion or other cover defects resulting in exposed refuse	
	309(c)	Overfill/off lined area	

Regulation 22 - Records

520(a)(8), 204(b)	Date of last groundwater monitoring report	1/16/15	Site Conditions	Damp
522	Date of last engineering report	6/23/15	Weather Conditions	Sunny
528	Liner construction in progress <input type="checkbox"/> Yes/No <input type="checkbox"/> No	Notice of liner construction <input type="checkbox"/> Yes/No <input type="checkbox"/>	Third part CQA on-site during construction	<input type="checkbox"/> Yes/No <input type="checkbox"/>
511	Date of last random inspection for unauthorized waste	N/A	Total # for month	
514, 520(a)(3)	Date of last quarterly methane monitoring	N/A	Detection level	514 Explosive gas records current? <input type="checkbox"/> Yes/No <input type="checkbox"/>
701, 520(a)(2)	Date of last special waste received	N/A	Disposal location	
520(c)	Previous quarter waste received	46471.31	Cy	2nd Qtr 2015
527	Surface water DMR records current? <input type="checkbox"/> Yes/No <input type="checkbox"/>			

Operator Name & Number	Stan Chivers-002979		Signature of Inspector				
Exit Interview Conducted with	Stan Chivers	Method	On Site	Date	7/23/2015	Time	1415



Arkansas Department of Environmental Quality

Solid Waste Management Division

Comments Page



Site Name	Green Bay Packaging, Inc., Arkansas Kraft Division	AFIN	15-00001	Permit Number	0284-S3N
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Category 2 Comments

Reg.22.510- General Operating Requirements (Leachate leaks or evidence of leachate seepage)

Maintenance of Cover Systems - The owner or operator shall be responsible for maintaining the cover system integrity and shall promptly repair erosion, washout, tracking, or other defects that result in exposed refuse in daily or intermediate cover or in the exposure of the infiltration barrier layer of the final cover system. Areas of leachate seepage, or areas exhibiting evidence of leachate seepage such as staining and discoloration of the cover system shall also be promptly repaired.

Comment: A leachate seep was noted near the southern end of the western slope of Area 4. Leachate was not leaving the cell and was routed to the leachate collection system. See photo 1.

Reg.22.529- Leachate Collection System Design And Construction (Leachate collection system)

(a) Applicability - The design and construction of leachate collection systems shall conform to the requirements of Reg.22.429.

Reg.22.429- Leachate Collection System Design And Construction

(a) System Requirements - Leachate collection systems shall be designed and installed to facilitate dewatering of the waste mass and disposal area. The systems shall be designed to limit the maximum leachate head on the bottom liner at any point at any time to 30 cm (12 inches) or less. The system shall also be designed to facilitate maintenance.

Comment: The alarm lights were flashing at the leachate collection sumps indicating that the leachate has risen above compliance levels. The facility had to shut-off the pumps in the leachate system in order to service and maintain the clarifier for the leachate treatment system. See photos 2 through 4

Additional Comments

Comment: The Green Bay Packaging plant was on shutdown for annual maintenance and retooling at the time of this inspection.

Date	7/23/2015	Signature of Inspector		Page	3
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Permit # 0284-S3N

Photo 1



Permit # 0284-S3N

Photo 2 & 3



Permit # 0284-S3N

Photo 4



Permit # 0284-S3N

Photo 5 & 6



Green Bay Packaging Inc.

• ARKANSAS KRAFT DIVISION
338 Hwy. 113 • MORRILTON, ARKANSAS 72110
501-354-4521

CERTIFIED MAIL: 7012 1010 0003 6528 2637

August 21, 2015

Mr. Charles Stringer, ADEQ Inspector
Solid Waste Management Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

AFIN: 15-00001
PMT# 0284-53N REC'D SCAN

AUG 24 2015

DOC ID# 68033
TO: 157 FUR SWMD

RE: AFIN 15-00001, Permit No. 0284-53N

Dear Mr. Stringer,

This letter is in response to your letter from July 27th, 2015 regarding a quarterly inspection of Arkansas Kraft on July 23rd, 2015. In the accompanying inspection report, it is noted that evidence of leachate seepage was seen in the southwestern corner of Area 4 inside of the landfill cell. Reg. 22.510 states cover system integrity must be maintained and repairs must be performed as needed. The regulation also states that areas exhibiting evidence of leachate seepage shall be promptly repaired.

As a corrective action, the facility immediately began working to cover the area where leachate seepage was noted. As of August 18th, the area was thoroughly covered.

Also noted in the inspection report were high levels on the leachate collection sumps. Reg. 22.429 states that systems should be designed to maintain leachate head on the bottom landfill liner at 12 inches or less.

Arkansas Kraft was in the midst of a planned annual maintenance shutdown where equipment and systems are inspected and repaired as necessary. While this allows leachate levels to exceed 12 inches of head, it is necessary for properly maintaining both production and environmental equipment. While levels in the collection sumps may become high during this time, levels are observed to ensure leachate does not inadvertently escape the leachate collection system.



If any additional information is required, please contact me at (501)-354-9518.

Sincerely,

A handwritten signature in black ink that reads "Stan Chivers". The signature is written in a cursive style with a large, stylized "S" at the beginning.

Stan Chivers
Environmental Supervisor
Green Bay Packaging, Inc.
Arkansas Kraft Division

cc: Tom Holte