



March 25, 2016

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 March 16, 2016, 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".

Charles Stringer
ADEQ Inspector
Office of Land Resources

Attachment

Cc: Bryan Leamons, ADEQ Engineer Supervisor, Office of Land Resources
Masoud Arjmandi, ADEQ Engineer, Office of Land Resources



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 #	089855
Date	3/16/2016	Entry Time	1450	Exit Time	1600

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
X	510(a)	Operations in accordance with permit documents	See Category 2 Comment page
	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	
510(n)	Leachate leaks or evidence of leachate seepage	
526	Survey controls	
529	Leachate collection system	
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	2/5/2016	Site Conditions	Dry				
522	Date of last engineering report	6/23/15	Weather Conditions	Sunny				
528	Liner construction in progress	Yes/No	Yes/No	Notice of liner construction	Yes/No	No	Third part CQA on-site during construction	Yes/No
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?	Yes/No		
701, 520(a)(2)	Date of last special waste received	N/A	Disposal location					
520(c)	Previous quarter waste received	58,292.95	Cy	4 th Qtr 2015				
527	Surface water DMR records current?	Yes/No						

Operator Name & Number	Stan Chivers-002979	Signature of Inspector					
Exit Interview Conducted with	Stan Chivers & Harrison Rae	Method	On Site	Date	3/16/2016	Time	1550



Arkansas Department of Environmental Quality

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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 (Operations in accordance with permit documents)

(a) Conformance with Permit Documents - All operations at the landfill shall be in accordance with the requirements of this Chapter, the permit and the approved plans and operating plan and narrative.

PERMIT CONDITIONS: 1. The disposal facility shall be constructed, maintained, and operated in accordance with the final plans, specifications and operation narrative as approved by the Department and in compliance with all applicable provisions of the Act, Regulation 22, and all other applicable rules and regulations.

Reg.22.528- Liner And Final Cover Design And Construction

(a) Quality Assurance Plan - Written quality assurance plans shall conform to the requirements of Reg.22.428.

Reg.22.428- Liner And Final Cover Design And Construction

(c) Soil Liner Material Criteria - Soil components of liners, final covers and testing of soil components shall meet the following minimum specifications:

(11) Test fills (section II, subsection 3 of the generic plan) will be required prior to the construction of the clay lined area at a facility meeting the requirements of this section. Where the facility or an earth work contractor has successfully completed and documented a minimum of 500,000 square feet of clay liner or final cover barrier construction consistent with the requirements of this section during the last three (3) years, the owner or operator may submit a written request to the Department to waive the test fill requirements of this section.

(f) Department Notification of Construction Schedule - When the liner or final cover construction activity has been substantially planned, the Department shall be notified of the tentative construction schedule. The notification should include the area to be constructed, and the names of the contractors and certifying professional. If the facility is to construct a test fill (see subsection

(b)(11) of this section), this date shall also be provided with the notification.

Comment: During the previous inspection, prep work for construction of Cell 5 was noted. On 6/19/2015, ADEQ received an email (Xref# 67712) from the facility's engineering consultant regarding splitting cell construction and certification in half. This email included construction plans and cell bottom elevations. No further communication was received prior to commencement of cell construction. ADEQ Office of Land Resources Engineers did not receive notification of cell construction schedule as required by Reg. 22.428(f) nor did they receive a test fill report or request for test fill waiver prior to construction of the cell as required by Reg. 22.428(c)(11). Construction of Cell 5 was completed prior to this inspection. See photos 1 through 3.

Date	3/16/2016	Signature of Inspector		Page	3
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Permit# 0284-S3N

Photo 1 & 2



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Photo 3 & 4



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Photo 5 & 6



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Photo 7

