



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", is written over a horizontal line.

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/ completed | 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

Solid Waste Management Division

Comments Page



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

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 |
|------|-----------|------------------------|--|------|---|

Permit# 0284-S3N

Photo 1 & 2



Permit# 0284-S3N

Photo 3 & 4



Permit# 0284-S3N

Photo 5 & 6



Permit# 0284-S3N

Photo 7

