



July 20, 2017

Mr. Alan Thomas  
Green Bay Packaging, Inc.  
PO Box 711  
Morrilton, AR 72110

RE: Quarterly Inspection conducted on June 23, 2017  
AFIN 15-00001  
Permit Number 0284-S3N

Dear Mr. Thomas:

The Arkansas Department of Environmental Quality – Office of Land Resources (ADEQ) conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Act (Arkansas Code, Annotated, § 8-6-201 *et seq.*), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. The inspection identified conditions at your facility which the ADEQ alleges constitute violations of APC&EC Regulation No. 22. A copy of the inspection report is attached.

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 within thirty (30) calendar days from the date of this letter to the attention of Kim Davenport. 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 you have any questions regarding the alleged violations, please do not hesitate to contact me at (501) 682-0856 or [davenport@adeq.state.ar.us](mailto:davenport@adeq.state.ar.us).

Sincerely,

A handwritten signature in blue ink, appearing to read "Kim Davenport", is shown within a rectangular box.

Kim Davenport  
Solid Waste Inspector  
Office of Land Resources

Attachment

cc: Tammie J. Hynum, Acting Sr. Operations Manager, Office of Land Resources



**Arkansas Department of Environmental Quality**  
**Office of Land Resources - Solid Waste Management**  
**Class 3 Landfill Inspection**



<b>Site Name</b>	Green Bay Packaging, Inc.	<b>County</b>	Conway	<b>AFIN</b>	15-0001
<b>Facility Address</b>	338 Highway 113, Morrilton, AR 72110	<b>Phone Number</b>	501-354-9289	<b>Permit Number</b>	0284-S3N
<b>Permittee Address</b>	PO Box 711, Morrilton, AR 72110	<b>E-Mail Address</b>	hvae@gbp.com	<b>PDS #</b>	098171
<b>Date</b>	6/23/2017	<b>Entry Time</b>	10:50	<b>Exit Time</b>	12:19

**Regulation 22 – Operational Standards**

**Category 1**

	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
	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**

	<b>Regulation</b>	<b>Item Description</b>	<b>Comments</b>
	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	During inspection leachate was noted ponding in the Northwest section of cell 5. Operator confirmed this was due to an un-identified pump malfunction.
	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	
X	510(n)	Erosion or other cover defects resulting in exposed refuse	Areas of erosion with exposed waste were noted on the East slope of cell 4 during inspection.
	309(c)	Overfill/off lined area	

## Regulation 22 - Records


520(a)(8), 204(b)	Date of last groundwater monitoring report			2/21/2017		Site Conditions		Wet		
522	Date of last engineering report			6/26/2017		Weather Conditions		overcast		
528	Liner construction in progress	Yes/No	No	Notice of liner construction	Yes/No	No	Third part CQA on-site during construction		Yes/No	NA
511	Date of last random inspection for unauthorized waste			NA	Total # for month					
514, 520(a)(3)	Date of last quarterly methane monitoring			NA	Detection level	514		Explosive gas records current?	Yes/No	
701, 520(a)(2)	Date of last special waste received			NA	Disposal location					
520(c)	Previous quarter waste received			See attached	Tons					
527	Surface water DMR records current?	Yes/No								

Operator Name & Number	Harrison Rae-003821		Signature of Inspector				
Exit Interview Conducted with	Josh Hines/Alan Thomas Harrison Rae	Method	In-person Via phone	Date	6/23/2017 7/13/2017	Time	12:00 14:30

**Arkansas Department of Environmental Quality (ADEQ)**  
**Official Photograph Sheet**


<b>Location</b>	Green Bay Packaging, Inc.			<b>Permit</b>	0284-S3N	<b>AFIN</b>	15-00001
<b>Photographer</b>	Kim Davenport			<b>Witness</b>	NA		
<b>Photo #</b>	1	<b>Of</b>	8	<b>Date</b>	6/23/2017	<b>Time</b>	1142
<b>Description</b>	Cell 5 current working face						




<b>Location</b>	Green Bay Packaging, Inc.			<b>Permit</b>	0284-S3N	<b>AFIN</b>	15-00001
<b>Photographer</b>	Kim Davenport			<b>Witness</b>	NA		
<b>Photo #</b>	2	<b>Of</b>	8	<b>Date</b>	6/23/2017	<b>Time</b>	1143
<b>Description</b>	Comingled storm water and leachate which is drained to water treatment basin.						




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**Official Photograph Sheet**


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<b>Photographer</b>	Kim Davenport			<b>Witness</b>	NA		
<b>Photo #</b>	3	<b>Of</b>	8	<b>Date</b>	6/23/2017	<b>Time</b>	1145
<b>Description</b>	Leachate on Western portion of cell 5 and exposed waste on East slope of cell 4						




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<b>Photographer</b>	Kim Davenport			<b>Witness</b>	NA		
<b>Photo #</b>	4	<b>Of</b>	8	<b>Date</b>	6/23/2017	<b>Time</b>	1148
<b>Description</b>	Exposed waste and leachate on East slope of cell 4						



**Arkansas Department of Environmental Quality (ADEQ)**  
**Official Photograph Sheet**


<b>Location</b>	Green Bay Packaging, Inc.			<b>Permit</b>	0284-S3N	<b>AFIN</b>	15-00001
<b>Photographer</b>	Kim Davenport			<b>Witness</b>	NA		
<b>Photo #</b>	5	<b>Of</b>	8	<b>Date</b>	6/23/2017	<b>Time</b>	1149
<b>Description</b>	Erosion with exposed waste and leachate on East slope of cell 4						




<b>Location</b>	Green Bay Packaging, Inc.			<b>Permit</b>	0284-S3N	<b>AFIN</b>	15-00001
<b>Photographer</b>	Kim Davenport			<b>Witness</b>	NA		
<b>Photo #</b>	6	<b>Of</b>	8	<b>Date</b>	6/23/2017	<b>Time</b>	1150
<b>Description</b>	Erosion and leachate on East slope of cell 4 and Western portion of cell 5						



**Arkansas Department of Environmental Quality (ADEQ)**  
**Official Photograph Sheet**

<b>Location</b>	Green Bay Packaging, Inc.			<b>Permit</b>	0284-S3N	<b>AFIN</b>	15-00001
<b>Photographer</b>	Kim Davenport			<b>Witness</b>	NA		
<b>Photo #</b>	7	<b>Of</b>	8	<b>Date</b>	6/23/2017	<b>Time</b>	1151
<b>Description</b>	Leachate ponding due to pump malfunction at Northwest section of cell 5.						



<b>Location</b>	Green Bay Packaging, Inc.			<b>Permit</b>	0284-S3N	<b>AFIN</b>	15-00001
<b>Photographer</b>	Kim Davenport			<b>Witness</b>	NA		
<b>Photo #</b>	8	<b>Of</b>	8	<b>Date</b>	6/23/2017	<b>Time</b>	1152
<b>Description</b>	Ponding of leachate and exposed waste Northwest portion of cell 5.						




AR KRAFT LANDFILL  
INSPECTION ADDENDUM  
Records Section

Month \_\_\_\_\_

Date of last groundwater monitoring report 2<sup>nd</sup> Half 2016 - feb 21, 2017

Date of last liner certification report May 11, 2016

Date of last annual engineer's report (Class 3N) ~~June 30, 2016~~ June 22, 201

Date of last inspection for hazardous waste (Class 3N) Each Load Total # for month \_\_\_\_\_

Date of last quarterly methane monitoring (3N) NA Detection Level \_\_\_\_\_

Date of last special waste received (3N) NA Disposal Location \_\_\_\_\_

Date of leachate disposal (3N) Automatic Method \_\_\_\_\_ Location \_\_\_\_\_

Last months reported waste received (Class 3N) Tons 60088.31 cyds  
- 5767.86 waste reduction

Person Interviewed \_\_\_\_\_ Date 54320.45 cyds to  
landfill

**Blue, Karen**

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**From:** Womble, Michelle  
**Sent:** Monday, August 21, 2017 1:11 PM  
**To:** Blue, Karen  
**Subject:** FW: 2nd quarter inspection  
**Attachments:** Response to ADEQ Landfill inspection conducted on June 23.docx

Hey Karen,  
Here's another inspection response. Thanks for your help!  
Michelle

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**From:** Davenport, Kimberly  
**Sent:** Monday, August 21, 2017 7:30 AM  
**To:** Womble, Michelle  
**Cc:** Cusher, Annette  
**Subject:** FW: 2nd quarter inspection

Michelle,

Can we get this response posted to the website?

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**From:** Alan Thomas [<mailto:athomas@gbp.com>]  
**Sent:** Friday, August 18, 2017 2:17 PM  
**To:** Davenport, Kimberly  
**Cc:** Debbie Benson  
**Subject:** RE: 2nd quarter inspection

Hi Kim, Please find attached Green Bay Packaging's response to comments associated with the routine quarterly landfill inspection conducted on June 23, 2017.

If you have any questions or need additional information, please do not hesitate to contact me at any time.

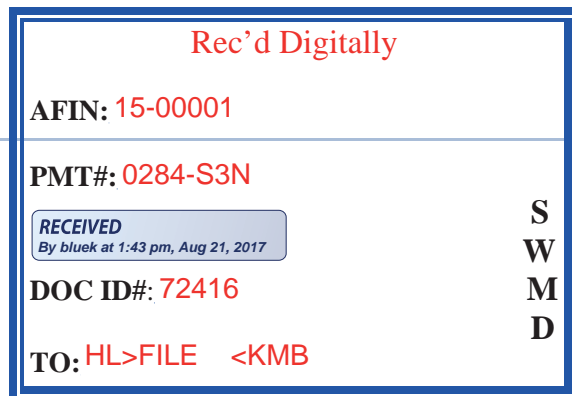
Thanks,

***Alan Thomas***  
***Environmental Manager***  
***Green Bay Packaging***  
***Arkansas Kraft Division***  
***501-354-9289 office***  
***501-306-8041 cell***



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**From:** Davenport, Kimberly [<mailto:davenport@adeq.state.ar.us>]  
**Sent:** Tuesday, August 01, 2017 7:28 AM



To: 'Harrison Rae'; '[athomas@gbp.com](mailto:athomas@gbp.com)'  
Subject: RE: 2nd quarter inspection

Here you go. Let me know if the link doesn't work or if you have any questions. How's the leachate pump repair coming along?

<https://www.adeg.state.ar.us/downloads/WebDatabases/InspectionsOnline/098171-insp.pdf>

Best Regards,

Kim

From: Harrison Rae [<mailto:hrae@gbp.com>]  
Sent: Monday, July 31, 2017 6:13 PM  
To: Davenport, Kimberly  
Subject: Re: 2nd quarter inspection

Kim,

He hasn't seen it, could you send it again to [athomas@gbp.com](mailto:athomas@gbp.com), and copy me as well?

Thanks,

Harrison

On Mon, Jul 31, 2017 at 16:31 Davenport, Kimberly <[davenport@adeq.state.ar.us](mailto:davenport@adeq.state.ar.us)> wrote:

Hi, Harrison.

It was sent out on the 20<sup>th</sup> to Alan Thomas at the below address. Did we send it to the wrong address? The lady who takes care of this is out today, so I'll check with her in the morning.

Kim

Mr. Alan Thomas  
Green Bay Packaging, Inc.  
PO Box 711

Morrilton, AR 72110

From: Harrison Rae [<mailto:hrae@gbp.com>]  
Sent: Monday, July 31, 2017 9:16 AM  
To: Davenport, Kimberly  
Subject: Re: 2nd quarter inspection

Kim,

I haven't heard anything from the ADEQ on the report, so I wanted to email you to see if there was some reason why we haven't gotten the inspection report back yet.

Thanks,

On Wed, Jul 12, 2017 at 3:45 PM, Davenport, Kimberly <[davenport@adeq.state.ar.us](mailto:davenport@adeq.state.ar.us)> wrote:

Hi, Harrison.

I missed you at last inspection but wanted to touch base now that the report is being finalized to let you know the details. Just give me a call when you get the chance.

Best regards,

***Kim Davenport***

Solid Waste Inspector

Compliance Program

Office of Land Resources

[501-682-0586](tel:501-682-0586)

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Harrison Rae  
Environmental Supervisor  
Green Bay Packaging, Inc.  
Arkansas Kraft Division  
Morrilton, AR  
C: (479) 747-3415 O: (501) 354-9518

Response to ADEQ Landfill inspection conducted on June 23, 2017

Green Bay Packaging- AR Kraft Division

Morrilton, AR

Noted Allegations During Inspection:

**Item #1:** *During the inspection, leachate was noted ponding in the Northwest section of cell 5. Operator confirmed this was due to an un-identified pump malfunction.*

**Corrective Action:** After further investigation of the leachate system, it was determined that it was not a malfunctioning pipe, but an incorrectly installed leachate line draining the area. The line was corrected and cleaned out, and the area began draining as expected. The images below show the area as it was draining after the repair and what it looks like as of today 8/18/2017, after receiving 5-6" of rain this week.



Draining after leachate line was corrected.



Pictures taken 8-18-2017 after heavy rains this week.



**Item #2:** *Areas of erosion with exposed waste were notes on the East slope of cell4 during the inspection.*

**Corrective Action:** The erosion on cell 4 has been addressed. The area was regraded, sloped correctly and the areas that were washing have been filled in. The area in question is shown in the picture below.

