



March 20, 2018

Mr. Alan Thomas  
Green Bay Packaging, Inc.  
338 Highway 113  
Morrilton, AR 72110

**RE: Quarterly Inspection conducted on March 7, 2018**  
**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 persistent may warrant formal enforcement action.

If you have any questions regarding the alleged violations, please do not hesitate to contact me at (501) 682-0586 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: Charles M. Johnson, Senior Manager, Regulated Waste Operations, 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>	15-00001
<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>	338 Highway 113, Morrilton, AR 72110	<b>E-Mail Address</b>	hvae@gbp.com	<b>PDS #</b>	101993
<b>Date</b>	3/7/2018	<b>Entry Time</b>	1322	<b>Exit Time</b>	1417

### 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	
X	510(h)(i)	Adequate maintenance of intermediate/final cover vegetation	Woody vegetation was present on the west slope of the active cell. (Refer to Photo #3.)
	514	Gas monitoring program	
	510(n)	Leachate leaks or evidence of leachate seepage	Leachate was observed on the east slope of the active cell; however, this is addressed in the facility's NPDES permit. (Refer to Photo #2.)
	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			12/19/2018		Site Conditions		Wet		
522	Date of last engineering report			7/26/2017		Weather Conditions		Sunny		
528	Liner construction in progress	Yes/No	No	Notice of liner construction	Yes/No	No	Third part CQA on-site during construction		Yes/No	N/A
511	Date of last random inspection for unauthorized waste			N/A	Total # for month	N/A				
514, 520(a)(3)	Date of last quarterly methane monitoring			N/A	Detection level	N/A	514	Explosive gas records current?	Yes/No	N/A
701, 520(a)(2)	Date of last special waste received			N/A	Disposal location	N/A				
520(c)	Previous quarter waste received			62,862.36	Tons					
527	Surface water DMR records current?	Yes/No								

Operator Name & Number	Josh Hines-003853		Signature of Inspector				
Exit Interview Conducted with	Harrison Rae & Allen Thomas	Method	In-person	Date	3/7/2018	Time	1400

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



<b>Location</b>	Green Bay Packaging, Inc.			<b>Permit</b>	0284-S3N	<b>AFIN</b>	15-0001
<b>Photographer</b>	Kim Davenport, ADEQ Solid Waste Inspector			<b>Witness</b>	N/A		
<b>Photo #</b>	1	<b>Of</b>	3	<b>Date</b>	3/7/2018	<b>Time</b>	1352
<b>Description</b>	An eastern view from the working face to observe waste and cover material, with the mid cell berm (noted with a red arrow) in the background.						



<b>Location</b>	Green Bay Packaging, Inc.			<b>Permit</b>	0284-S3N	<b>AFIN</b>	15-0001
<b>Photographer</b>	Kim Davenport, ADEQ Solid Waste Inspector			<b>Witness</b>	N/A		
<b>Photo #</b>	2	<b>Of</b>	3	<b>Date</b>	3/7/2018	<b>Time</b>	1354
<b>Description</b>	After the most recent heavy rain event, leachate was observed leaving the landfill and diverting to the on-site treatment pond operated by GBP. This process is addressed in the facility's NPDES permit and operating plan.						



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

<b>Location</b>	Green Bay Packaging, Inc.				<b>Permit</b>	0284-S3N	<b>AFIN</b>	15-0001
<b>Photographer</b>	Kim Davenport, ADEQ Solid Waste Inspector				<b>Witness</b>	N/A		
<b>Photo #</b>	3	<b>Of</b>	3		<b>Date</b>	3/7/2018	<b>Time</b>	1405
<b>Description</b>	Woody vegetation was present on the western slope of the active landfill unit.							
								



A R K A N S A S  
Department of Environmental Quality

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***Regulated Waste Operations Compliance Branch***  
***OFFICE OF LAND RESOURCES***  
***ROUTING SLIP***

Date: 3/16/2018

Subj: Green Bay Packaging, Inc. – 0284-S3N Q1 2018 – Inspection Report

From: Kim Davenport, ADEQ Solid Waste Inspector

<u><i>Route in turn to:</i></u>	<u><i>Action Needed</i></u>	<u><i>Date Received</i></u>	<u><i>Date Reviewed</i></u>	<u><i>Initials</i></u>
Ryan Hayden	■Concurrence ■Review	<u>3/16/18</u>	<u>3/16/18</u>	<u>RH</u>
Chris Krou	■Concurrence ■Review	<u>3/16/18</u>	<u>3/16/18</u>	<u>gc</u>

***\*Note: Marking the Concurrence box indicates the individual agrees with the applicable text as it relates to their individual discipline and Work Section (e.g., Engineer; Risk Assessor; Geology; Compliance; Policy/Management), as applicable. Marking the Review box indicates the individual has read the document.***

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**COMMENTS:**