



May 23, 2008

Green Bay Packaging, Inc., Arkansas Kraft Division
Attn: Mr. Matt Szymanski, Manager
P.O. Box 711
Morrilton, AR 72110

RE: Administrative Permit Modification – Removal of Expiration Date
Green Bay Packaging, Inc., Arkansas Kraft Division Class 3N Landfill
Permit Number: 0284-S3N AFIN: 15-00001
Document Number: 52697 Cross Reference Number: 52610

Dear Mr. Szymanski:

The Arkansas Department of Environmental Quality-Solid Waste Management Division (ADEQ-SWMD) has received your request to extend the duration of the above referenced permit for the Arkansas Kraft Division Class 3N Landfill. Under current regulations the landfill permit is effective as long as the waste remains within the permitted boundaries and does not exceed the permitted capacity, fill volume or elevations.

The ADEQ-SWMD hereby provides this administratively modified permit with expiration date removed. Attached is the new permit cover page for the Arkansas Kraft Division Class 3N Landfill. Please replace the existing cover page of your permit with the new cover page.

If you have any questions regarding this correspondence, please contact me at (501) 683-3395.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Robinson", followed by a long, horizontal, wavy line.

Michael Robinson
Chief - SWMD

Enclosure

cc: Harry Elliott, Enforcement Branch Manager SWMD
Kevin Nance, District Field Inspector SWMD
Kenneth G. Brockway, Corporate Environmental Manager, Green Bay Packaging, Inc.



**PERMIT
FOR THE CONSTRUCTION AND OPERATION OF A
CLASS 3N SOLID WASTE DISPOSAL FACILITY
ISSUED BY**



**STATE OF ARKANSAS
DEPARTMENT OF ENVIRONMENTAL QUALITY
SOLID WASTE MANAGEMENT DIVISION**

PERMIT CLASS: Class 3N Landfill
CSN IDENTIFICATION: 15-00001
PERMIT NUMBER: 0284-S3N

EFFECTIVE DATE: November 8, 1996

REISSUED PERMIT COVER PAGE: May 23, 2008, [Administrative Amendment - Permit Expiration Date Removed]

PERMIT OWNER AND ADDRESS: Green Bay Packaging, Inc.,
Arkansas Kraft Division
P.O. Box 711

DESCRIPTION OF THIS PERMIT ACTION: Administrative Amendment - Permit Expiration Date Removed.

LOCATION: Arkansas Kraft Mill
[Adjacent to Highway 113,
approximately 1 mile
southeast of Oppelo]

Existing Facility:
In N ½ of NE ¼, Sec. 18, and Part of N ½ of
NW ¼, Sec 17, all in T-5-N, R-16-W,
Conway County, Arkansas.

Expansion Site:
Part of S ½, SE ¼, Sec. 7, and SW ¼, SW ¼
fractional Sec. 8, the N ½, NE ¼ of Sec. 18, &
the N ½, NW ¼, Sec. 17, all in T-5-N, R-16-W,
Conway County, Arkansas

DESIGN ENGINEER: Garver + Garver, P.A.

PERMIT CONDITIONS: This permit is your authority to construct and/or operate the Solid Waste Disposal Facility set forth in your original application dated January 26, 1981, and modification applications dated July 12, 1990, March 30, 1992 and September 30, 1994. This permit is issued pursuant to the provisions of the Arkansas Solid Waste Management Act (Act 237 of 1971; Sec. 82-2701 et seq., Ark. State.), hereafter called the "Act", Regulation Number 22, Arkansas Solid Waste Management Code, as adopted by the Pollution Control and Ecology Commission, hereafter called "Regulation 22"; and all other applicable rules and regulations of the Department of Pollution Control and Ecology, hereafter called "Department", and the following terms and 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.
2. This landfill permit is effective as long as the waste remains within the permitted boundaries and does not exceed the permitted capacity, fill volume or elevations. The Department shall be notified in writing upon landfill closure in order that it may be inspected.

SEE ATTACHED PAGES FOR ADDITIONAL PERMIT CONDITIONS

CERTIFICATE OF SERVICE

I, Mona Parkman, hereby certify that a copy of this permit has been mailed by first-class mail to Mr. Matt Szymanski, Manager, P.O. Box 711, Morrilton, AR 72110 on or before this 27th day of May 2008.



PERMIT
FOR THE CONSTRUCTION AND OPERATION OF A
SOLID WASTE DISPOSAL FACILITY
ISSUED BY
STATE OF ARKANSAS
DEPARTMENT OF POLLUTION CONTROL AND ECOLOGY



PERMIT CLASS: 3N

CSN IDENTIFICATION: 15-0001

PERMIT NUMBER: 284-S3N

EFFECTIVE DATE: November 8, 1996

EXPIRATION DATE: November 8, 2006

PERMIT OWNER AND ADDRESS: Green Bay Packaging, Inc.
Arkansas Kraft Division
P. O. Box 711
Morrilton, AR 72110

LOCATION: Arkansas Kraft Mill
[Adjacent to Highway 113,
approximately 1 mile
southeast of Oppelo]

Existing Facility:

In N 1/2 of NE 1/4, Sec. 18, and Part of N 1/2 of
NW 1/4, Sec. 17, all in T-5-N, R-16-W,
Conway County, Arkansas.

Expansion Site:

Part of S 1/2, SE 1/4, Sec. 7, and SW 1/4, SW 1/4
fractional Sec. 8, the N 1/2, NE 1/4 of Sec. 18, &
the N 1/2, NW 1/4, Sec. 17, all in T-5-N, R-16-W,
Conway County Arkansas.

DESIGN ENGINEERS: Garver + Garver, P.A.

PERMIT CONDITIONS: This permit is your authority to construct and/or operate the Solid Waste Disposal Facility set forth in your original application dated January 26, 1981, and modification applications dated July 12, 1990, March 30, 1992 and September 30, 1994. This permit is issued pursuant to the provisions of the Arkansas Solid Waste Management Act (Act 237 of 1971; Sec. 82-2701 et seq., Ark. States.), hereinafter called the "Act", Regulation Number 22, Arkansas Solid Waste Management Code, as adopted by the Pollution Control and Ecology Commission, hereinafter called "Regulation 22"; and all other applicable rules and regulations of the Department of Pollution Control and Ecology, hereinafter called "Department", and the following terms and 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.
2. This permit will expire upon the expiration date or when the authorized fill elevations have been attained, whichever occurs first. The Department shall be notified in writing upon landfill closure in order that it may be inspected.

SEE ATTACHED SHEET(S) FOR ADDITIONAL CONDITIONS

3. The facility shall be maintained in good operating condition and operated by licensed, qualified personnel in accordance with Arkansas Department of Pollution Control and Ecology Regulation No. 27 at all times.

4. This permit may be revoked or modified whenever, in the opinion of the Department, the facilities are no longer in compliance with the Act, Regulation 22, and applicable rules and regulations. This permit shall not relieve the permittee, its agents or employees, from compliance with all provisions of the Act and Regulation 22.

5. Nothing herein contained shall be construed as releasing the permittee from any liability for damage to persons or property by reason of the installation, maintenance, or operation of the disposal facility.

6. This permit is issued in reliance upon the statements and representations made in the application and the plans and specifications and the Department has no responsibility for the adequacy or proper functioning of the disposal facility.

7. This permit is for a 185 acre Class 3-N facility with approximately 100 acres to be used for waste disposal in the areas indicated on the plans. The permit will expire when all authorized disposal areas described in the final engineering plans have been filled to design capacity and closed out in accordance with Condition No. 9 hereinafter.

Post closure maintenance period will be a minimum of 2 [two] years, starting upon the date the Department accepts closure. The length of the post closure period may be decreased or increased by the Director in accordance with Section 22.1302 of Regulation 22.

8. On the effective date, this permit supersedes all prior solid waste disposal permits issued by the Department to the permittee. Monitoring, testing, recording, and reporting requirements at the frequency(ies) listed herein become effective on the effective date of this permit.

9. For each area, waste disposal operations shall be confined to the smallest practicable extent and shall progress in an orderly manner until that area is filled to authorized final elevations indicated on the approved plans. Once final authorized fill grades are attained in an area, the permittee shall begin final capping of that area in accordance with the approved operation narrative, specifications, plans, permit conditions herein, and Section 22.1301 of Regulation 22.

For disposal units in the existing landfill facility permitted prior to issuance of this permit, final capping in accordance with previous Operating Methods [July 1990, Revised November 1991] will be acceptable, provided the permittee furnishes the Department an acceptable site survey of all areas closed in accordance with paragraph (i) of Section 22.1301 of Regulation 22 within six (6) months of the effective date of this permit. Any disposal unit not acceptably closed in accordance with the criteria in this paragraph within in six (6) months of the effective date of this permit shall be closed in accordance with the preceding paragraph and Condition No. 15 hereinafter.

10. The amount of financial assurance required is \$150,000.00. The instruments used must be in the exact form set forth in Regulation 22 and must be filed with the Department before the permit can become effective. A portion or all of the financial assurance may be held by the Department beyond the time of completion of the landfilling operation to ensure satisfactory closure and post-closure care in accordance with Regulation 22.

GREEN BAY PACKAGING, INC., ARKANSAS KRAFT DIVISION

Permit Number 284-S3N

November 8, 1996

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11. Any change in ownership or control of the operation of this landfill may be considered a modification of the permit. The permittee shall notify the Department of a change in ownership or a change of operators as defined in Regulation No. 22, Section 22.102. Change in ownership or control is determined by a change of five percent (5%) or more of the stock of the permittee. Notwithstanding the above, the permittee is not required to notify the Department of any transfer of 5% or more of the debt or equity of the permittee among the persons and entities disclosed in Section E of the Disclosure Statement which accompanied the permit application, nor shall such transfer constitute a modification of the permit. The permittee is only required to notify the Department in the event there is a transfer of five percent (5%) or more of the debt or equity of the permittee, and that person has not previously been disclosed under Section E of the Disclosure Statement.

12. This permit is for the disposal of only solid waste generated by the Arkansas Kraft Mill at Oppelo. All waste streams identified in the approved operating plan are authorized for disposal. If the waste streams identified in the operating plan exhibit hazardous waste or liquid waste characteristics, such waste is not authorized for disposal in the landfill facility. Liquid waste is that as defined in Section 22.102 of Regulation No. 22. The following "special materials," as defined in Regulation No. 22 are authorized for disposal in the landfill facility: Friable Asbestos Material, Incinerator Ash and Residue, and Solidified Sludge.

Disposal of "special materials" shall be handled in accordance with procedures outlined in Regulation Number 22. Specific authorization from the Department must be obtained prior to disposal of any other "special material" not listed above.

The following wastes shall be tested using toxicity characteristics leaching procedures (TCLP) at least semi-annually for two (2) years after the effective date of this permit then annually thereafter unless a significant process change is made. In the event a contaminant is detected at a concentration equal to or greater than the TCLP regulatory level, the Department may require continued testing at a semi-annual frequency for that contaminant.

- sludge from sludge press
- fly ash
- green liquor dregs/slaker/lime wastes (mixture of 1/3 of each)

Results shall be submitted to the Department as soon as practicable after analysis.

Press sludge may be utilized as an alternative daily and intermediate cover under Regulation 22.512 (c) provided that the use of sludge as cover adequately meets the requirements of Regulation 22.512 (a), (b) and (c).

13. The permittee shall maintain an Operating Record in the office area of the main complex (or at an alternative location approved in writing by the Department) of all documentation, monitoring or test results, records, and certifications required by the operation narrative, specifications, and plans, and/or permit conditions herein. The permittee shall forward a copy of information from the Operating Record to ADPC&E when requested by the Department. Emergency response facilities, telephone communication system, potable water supplies and employee facilities currently located in the office area of the main facility are deemed adequate to meet the requirements of Regulation 22.510 (k) and (l).

GREEN BAY PACKAGING, INC., ARKANSAS KRAFT DIVISION

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14. Proper construction of the clay liner and leachate collection system shall be observed and certified in writing in a construction quality assurance (CQA) documentation report to the Department by a Registered Engineer whenever an area or phase of the landfill is prepared for use. The report shall include CQA/QC test results required by Section 8 of the operation narrative and requirements herein; and map(s) indicating the location, designation, extent of area(s) actually prepared for use, and test locations. The report shall be submitted to the Department at least fourteen (14) days prior to waste placement in that area or phase. Minimum testing for source material for the clay liner system is as follows [ASTM testing procedures in accordance with Section 22.428 of Regulation No. 22 shall be used]:

<u>Test</u>	<u>Frequency</u>	<u>Passing Criteria</u>
Sieve Analysis	1 per 5000 cubic yards	$\geq 30\%$ of material passing No. 200 Sieve $\leq 20\%$ of material retained on No. 4 Sieve No particles greater than 1"
Plasticity Index	1 per 5000 cubic yards	≥ 10

Minimum testing for the as-constructed clay liner system is as follows:

<u>Test</u>	<u>Frequency</u>	<u>Passing Criteria</u>
Permeability	1 per acre per lift	$\leq 1 \times (10)^{-7}$ cm/sec
Proctor Density	2 per acre per lift	$\geq 90\%$ Standard Proctor
Moisture Content	2 per acre per lift	0 - 6% > optimum
Thickness of Liner	2 per acre	$\geq 24"$

All test results, maps, certifications, acceptances, and other documentation required by the operation narrative, specifications, plans, and/or permit conditions herein shall be maintained on-site for review by authorized representatives of the Department.

15. Final Cover System [For disposal units already in existence on the effective date of this permit, see paragraph two of Condition No. 9 hereinbefore]

Proper construction of the final cover system shall be observed and certified in writing in a report to the Department by a Registered Engineer whenever an area or phase of the landfill is closed. The report shall include a summary of test results required by Section 8 of the operation narrative and requirements herein; and map(s) indicating the location, designation, and extent of area(s) actually closed-out, and test locations. Minimum testing for source material for the final cover system is as follows:

<u>Test</u>	<u>Frequency</u>	<u>Passing Criteria</u>
Sieve Analysis	1 per 5000 cubic yards	$\geq 30\%$ of material passing No. 200 Sieve $\leq 20\%$ of material retained on No. 4 Sieve No particles greater than 1"
Plasticity Index	1 per 5000 cubic yards	≥ 10

Minimum testing for the as-constructed final cover system is as follows:

<u>Test</u>	<u>Frequency</u>	<u>Passing Criteria</u>
Permeability	1 per acre per lift	$\leq 1 \times (10)^{-7}$ cm/sec
Proctor Density	2 per acre per lift	≥ 90 % Standard Proctor
Moisture Content	2 per acre per lift	0 - 6% > optimum
Depth of Cover*	2 per acre	≥ 24 "

*For clay cap only. A ≥ 6 " vegetation layer over clay cap is required for a total of ≥ 30 ".

All test results, maps, certifications, acceptances, and other documentation required by the operation narrative, specification, plans, and/or permit conditions herein shall be maintained on-site for review by authorized representatives of the Department.

16. Each groundwater monitoring well shall be permanently marked with the appropriate unique identification sequence number or designation corresponding to the plans. Each monitoring well shall be independently analyzed for parameters indicated hereinafter. Groundwater sampling and analysis shall comply with quality assurance guidelines of 40 CFR Part 136 - Guidelines Establishing Test Procedures for the Analysis of Pollutants under the Clean Water Act. Monitoring wells must be sampled, analyzed, and reported to the Department semi-annually unless more frequent monitoring is deemed necessary by the Department. Groundwater samples shall not be field filtered.

The facility groundwater monitoring system shall consist of the following seven (7) monitoring points:

- Existing monitoring wells P-4, P-5, P-7, P-8, P-11, and P-12
- One additional monitoring well shall be installed at the location designated as P-14 on the plan sheet titled "Potentiometric Surface Map" dated January 20, 1995 of the permit drawings. The well shall be constructed and developed in accordance with ASTM D 5092-90 Design and Installation of Ground Water Monitoring Wells in Aquifers and screened to monitor the uppermost aquifer. Complete lithologic logs must be recorded by a qualified geologist or geotechnical engineer and submitted to the Department.

17. Sampling of groundwater and measurement of static water levels shall only be done by trained personnel familiar with proper procedures and techniques. Analysis of groundwater shall be performed only by wastewater testing laboratory(ies) certified by the Department. Groundwater sampling and analysis shall in all cases comply with the requirements of Subpart E of 40 CFR Part 258 as adopted in Regulation Number 22. Results are to be submitted directly to the Department from the contract laboratory and shall include the following parameters [Regular Testing Requirements]:

Turbidity	Chloride	Sulfate
Total Dissolved Solids (TDS)	Iron	Temperature
Total Organic Carbon	Manganese	Specific Conductance
pH	Depth to Groundwater (feet)	
T.O.X.	Potentiometric Surface Elevation (MSL)	

Based on the first year sampling results, parameters not detected in representative samples of the landfill leachate and not detected in the monitoring system may be dropped from the monitoring program upon Department approval. Depending upon the results of testing, the Department will determine whether continued semi-annual testing for a particular parameter is justified [Other Testing Requirements]:

Arsenic	1,4-Dichlorobenzene	Mercury
Barium	1,2-Dichloroethane	Nitrate
Benzene	1,1-Dichloroethylene	Selenium
Cadmium	Fluoride	Silver
Carbon Tetrachloride	Lindane	1,1,1-Trichloroethane
Chromium (hexavalent)	Lead	Trichloroethylene
Sulfide or O.R.P.		Vinyl Chloride

18. The permittee must develop a comprehensive written plan for sampling and analysis of groundwater that ensures accurate groundwater monitoring results. The plan must be submitted to the Department. The plan must include procedures and techniques for:

- Sample Collection
- Sample Preservation and Shipment
- Analytical Procedures
- Chain of Custody Control
- Quality Assurance and Quality Control

19. A statistical method to be used for evaluating monitoring results for each groundwater constituent must be selected by the permittee and approved by the Department. The permittee must determine whether there is a statistically significant increase (or decrease in the case of pH) for each groundwater monitoring constituent in accordance with the approved statistical method.

20. If a statistically significant increase over background has been detected for one or more parameters, the Department may require more frequent sampling or additional monitoring parameters.

21. Seeding with suitable perennial grasses and soil stabilization shall be conducted in the spring and fall on all exposed soil surfaces not currently receiving wastes. Furthermore, re-vegetation shall be accomplished as soon as practicable after final elevations are attained and the area is capped. Following establishment of cover vegetation, the vegetation shall be properly mowed as needed during the growing season to control undesirable annual weed and woody vegetation growth and to facilitate proper inspection of the cover.

Borrow site(s) shall be reclaimed through seeding with suitable perennial grasses to control erosion and final grading to promote proper drainage, or other means acceptable to the Department.

22. The final grades/elevations as shown on the approved engineering plans shall not be adjusted in anticipation of settling and consolidation of the waste mass. The actual grades/elevations upon completion and capping of the fill shall not exceed those indicated on approved plans.

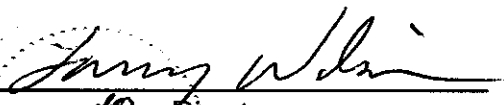
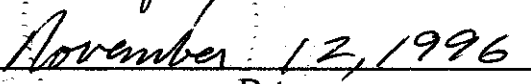
23. Diversion terraces or berms shall be constructed and maintained around active fill area(s) to divert surface run-on water around area(s). This shall be supplemented by portable pumps, if necessary, to keep run-on water from entering active fill area(s).

24. Any statements in the permit application, operation narrative, or plans that conflict with Regulation 22, permit conditions herein, or applicable laws shall not be considered authorized by the Department.


25. The Department, its employees, agents or any authorized person shall have the right to enter the property at any time for any reason as set out in Regulation 22 for the purpose including but not limited to taking of samples, inspection, and any other enforcement or engineering action, without interference or delay from the permittee.

26. The Department's decision to issue this permit is final for purposes of appeal as of the date indicated in the Certificate of Service below.

APPROVED BY: Department of Pollution Control & Ecology
8001 National Drive; Post Office Box 8913
Little Rock, Arkansas 72219-8913


for Director

Date

CERTIFICATE OF SERVICE

 hereby certify that a copy of this permit has been mailed by first-class mail to Mr. H. Marion Swindell, Manager; Green Bay Packaging, Inc., Arkansas Kraft Division; P. O. Box 711; Morrilton, AR 72110 on or before this

14th day of November, 1996.