

## Haley Griffith (adpce.ad)

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**From:** Vaughn, Kiefer <KV Vaughn@pmico.com>  
**Sent:** Friday, December 13, 2024 9:50 AM  
**To:** EE GW Reports; Jordan Anderson (adpce.ad)  
**Cc:** Wesson, Jacob; Rasburry, Terri  
**Subject:** Green Bay Packaging - Second Half 2024 Notification of Statistically Significant Increases and ASD  
**Attachments:** 2nd Half 2024 ASD Arkansas Kraft.pdf

See attached.

**Kiefer Vaughn, P.G., MSc**

Project Geologist | Environmental

**Pollution Management, Inc., A Terracon Company**

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December 13, 2024

Mr. Jordan Anderson  
Groundwater Branch  
ARKANSAS ENERGY AND ENVIRONMENT  
DIVISION OF ENVIRONMENTAL QUALITY  
5301 Northshore Drive  
North Little Rock, AR 72118-5328

VIA EMAIL: [EE.gwreports@arkansas.gov](mailto:EE.gwreports@arkansas.gov)  
and [Jordan.Anderson@arkansas.gov](mailto:Jordan.Anderson@arkansas.gov)

RE: Second Half 2024 Notification of Statistically Significant Increases  
and Alternative Source Demonstration  
Green Bay Packaging  
Arkansas Kraft Class 3N Landfill  
Solid Waste Permit 284-S3N

Dear Mr. Anderson:

Pollution Management Inc. (PMI), on behalf of the Green Bay Packaging—Arkansas Kraft Class 3N Landfill—and as required by Regulation No. 22, §22.1204(c)(1), is presenting you with this letter as notification of Statistically Significant Increases (SSIs) that occurred during the Second Half 2024 Groundwater Monitoring Event conducted on October 15, 2024. The results of the statistical analysis identified eight (8) constituents, chloride at P-4 and P-14, sulfate at P-4, P-5, and P-7, TDS at P-4 and P-8, manganese at P-11, as SSIs during the Second Half 2024 monitoring event.

The following are Alternative Source Demonstrations (ASD) for this event for these SSIs in accordance with Regulation No. 22, §22.1204(c)(3):

P-4 and P-5 are upgradient of the landfill; therefore, elevated sulfate, TDS, and chloride concentrations are likely attributable to natural groundwater variability.

A Interwell Prediction Interval was performed for TDS at P-8, manganese at P-11, for sulfate at P-7 and chloride at P-14 to compare the up-gradient to down-gradient wells. There were no exceedances with the Interwell Prediction Intervals suggesting concentrations are likely attributable to natural groundwater variability.

Sincerely,  
**Pollution Management, Inc., A Terracon Company**

A handwritten signature in blue ink, appearing to read 'Kiefer A. Vaughn', is written over the company name.

Kiefer A. Vaughn, P.G.  
Project Manager

KAV:tlr

cc: Jacob Wesson, w/encl.

KT247004

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