

## Haley Griffith (adpce.ad)

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**Subject:** RE: 2024 AEIR Georgia Pacific Class 3N North Landfill - AFIN 02-00013

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**From:** Bardella, Tony L <[Tony.Bardella@terracon.com](mailto:Tony.Bardella@terracon.com)>

**Sent:** Monday, June 30, 2025 9:32 AM

**To:** Bennett, Richard <[BENNETT@adeq.state.ar.us](mailto:BENNETT@adeq.state.ar.us)>

**Cc:** McCormick, Dave C. <[Dave.McCormick@terracon.com](mailto:Dave.McCormick@terracon.com)>; Ross, Sarah M <[sarah.ross@gapac.com](mailto:sarah.ross@gapac.com)>; Chavis, Dana M <[dana.chavis@gapac.com](mailto:dana.chavis@gapac.com)>; Johnson, Rachel M <[rachel.johnson2@gapac.com](mailto:rachel.johnson2@gapac.com)>

**Subject:** 2024 AEIR Georgia Pacific Class 3N North Landfill - AFIN 02-00013

Richard,

Please see the attached 2024 Annual Engineering Inspection Report for Georgia Pacific's North Class 3N landfills.

Thank you,

**Tony Bardella**

Staff Engineer | Solid Waste Services



25809 I-30 South | Bryant, Arkansas 72022

D (501) 943-1049 | M (501) 794-9466

[Tony.Bardella@terracon.com](mailto:Tony.Bardella@terracon.com) | [Terracon.com](http://Terracon.com)



Terracon provides environmental, facilities, geotechnical, and materials consulting engineering services delivered with responsiveness, resourcefulness, and reliability.

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# 2024 Annual Engineering Inspection Report

Georgia-Pacific Crossett LLC Class 3N  
North Landfill

Permit No. 0292-S3N

AFIN: 02-00013

June 30, 2025 | Terracon Project 35257048

Prepared for:



Georgia-Pacific Crossett LLC  
100 Supply Road  
Crossett, Arkansas 71635  
(870) 415-6363



*DL McD*  
*6/30/25*



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[Terracon.com](https://www.terracon.com)

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- Materials

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## PROFESSIONAL ENGINEER'S CERTIFICATION

As required by *Arkansas Rule 22 (Rule.22.423)*, representatives from Terracon Consultants, Inc. inspected the Georgia-Pacific Crossett LLC, Class 3N Landfill (Facility) on June 4, 2025. During this inspection, general Facility operating practices and procedures in relation to *Arkansas Rule 22* and the Facility's permit were reviewed. Based on site visits, review of the facility operating records, and discussions with the landfill owner/operator, it is my professional opinion that the Facility is being operated and maintained in compliance with *Arkansas Rule 22* and the Facility's solid waste permit. This opinion is contingent on the fact that all information supplied to the signatory authority as of the date of this certification is unquestionably accurate and provided in good faith.



David C. McCormick, P.E.  
Arkansas Professional Engineer No. 9199



6/30/25

Date





# ANNUAL ENGINEERING INSPECTION REPORT (AEIR) FORM

Reporting Year: 2024

Note: Check applicable landfill class. Class 1 (Reg 22.423(b))     , Class 3 (22.522(a)) X, Class 4 (22.619(b))     

Facility Name: Georgia-Pacific Crossett North Landfill AFIN: 02-00013 Permit #: 0292-S3N Landfill Class: 3N

Report Submittal Date: June 30, 2025 Date of Landfill Site Inspection by Certifying Engineer: June 4, 2025

***Complete the form as indicated  
Instructions are bolded and italicized.***

***COLUMN TO BE COMPLETED BY REPORTER***




Item	Regulation Reference	Item Description	Report Information/Comments/Remarks	Attachment Reference
1	22.423(b)(1) 22.522(a)(1) 22.619(b)(1)	Remaining volume in current cell.	a) <u>N/A</u> cubic yards (The Landfill was in Closure construction in 2023 and is currently under final cover. A closure report was submitted to the ADEQ June 4, 2024 and additional information submitted August 28, 2024)	
		Projected date of opening new cell.	b) Date: <u>N/A</u> .	
2	22.423(b)(2) 22.522(a)(2) 22.619(b)(2)	Remaining volume of all permitted units.	a) <u>N/A</u> cubic yards (The landfill is currently under final cover.)	
		Total air space used during the reporting period.	b) <u>0</u> cubic yards	
		Estimated remaining site life (years) based on utilization rate during the reporting period. <b>Note: Itemize current permitted unit/cell information - use attachment if necessary.</b>	c) <b>Landfill Unit/Cell remaining life:</b> Landfill unit/cell <u>Phase 1/Stage 1</u> , <u>0</u> years. Landfill unit/cell <u>                    </u> , <u>    </u> years. Landfill unit/cell <u>                    </u> , <u>    </u> years. d) <b>Entire permitted landfill:</b> <u>0</u> years remaining life.	
3	22.423(b)(3) 22.522(a)(3) 22.619(b)(3)	Documentation of fill progression in compliance with permit plans, specs and operating plan and narrative. <b>Note: Provide narrative regarding fill progression during the reporting period. Be specific about landfill unit/cell designations (example: Cell 1, Phase A completely filled; Cell 2, Phase A, 50% full, being filled south to north as of December 31). Specifically note any overfill conditions.</b>	a) <b>Progression narrative:</b> <u>The site began final cover construction in 2024 and is currently under final cover. A closure report was submitted to the ADEQ June 4, 2024 and additional information submitted August 28, 2024.</u>	
4	22.423(b)(4) 22.522(a)(4) 22.619(b)(4)	Documentation of compliance with regulatory operating requirements, permit conditions, approved operating plan, and other applicable regulations. <b>Note: Review current operating plans, and permit conditions. Include photographs of engineer's</b>	a) <b>Weekly/monthly operational logs exist (Y/N)?</b> <u>Y</u> b) <b>Photos of AEIR inspection attached (Y/N)?</b> <u>Y</u> c) <b>Waste volume in and out records exist (Y/N)?</b> <u>Y</u> d) <b>Unauthorized waste forms exist (Y/N)?</b> <u>Y</u> e) <b>Daily/weekly cover adequate at time of inspection (Y/N)?</b> <u>Y</u>	A

		<i>inspection as Attachment A. Check for weekly/monthly operational logs, waste volume records in and out of landfill, unauthorized waste form sheets, waste cover maintenance, stormwater reports to ADEQ, and wet weather repair information.</i>	<b>f) Alternative Daily Cover (ADC) Plan located onsite (Y/N)?</b> <u>N/A. See Special Condition 18 of Permit 0292-S3N.</u> <b>Operations in compliance with ADC Plan (Y/N)?</b> <u>N/A. The Facility is in compliance with Special Condition 18 of Permit 0292-S3N.</u> <b>g) Liquid Waste Management (LWM) Plan located onsite (Y/N)?</b> <u>N/A</u> <b>Operations in compliance with LWM Plan (Y/N)?</b> <u>N/A</u> <b>h) Liquids received to be bulked during reporting period:</b> <u>N/A</u> gallons <u>N/A</u> tons <b>i) Waste cover of inactive areas maintained adequately (Y/N)?</b> <u>Y</u> <b>j) Net amount of waste disposed in landfill during reporting period:</b> <u>                    </u> cubic yards <u>0</u> tons <b>k) Leachate head level less than 1' on liner at time of inspection (Y/N)?</b> <u>Y</u>	
5	22.423(b)(5) 22.522(a)(5) 22.619(b)(5)	Updated contour map that depicts: <i>Note: Provide updated drawing(s) and final cover permit drawing as Attachment B – discuss any discrepancies. Max. contour interval = 2 feet)</i>	<b>a) Updated contour drawing attached (Y/N)?</b> <u>Y</u> <b>b) Final cover permit drawing attached (Y/N)?</b> <u>Y</u> <b>c) List all discrepancies here:</b> <u>N/A</u> <b>d) Is there an overfill condition (Y/N)?</b> <u>N</u>	<b>B</b>
		(i) horizontal and vertical extent of active and inactive fill areas;		
		(ii) status of all permitted units/cells; <i>(Note: Label all active (working face, bulking area, stockpiles), inactive, closed and interim cover areas).</i>	<b>a) Currently, does the facility have sufficient on-site quantities and types of soils for liner and cover construction of permitted units/cells (Y/N)?</b> <u>Y</u> <i>(Landfill is under final cover)</i> <b>b) If not, where will deficiency shortfalls be obtained (be specific)?</b>  <b>c) Is the current Design Narrative earthwork balance accurate (Y/N)?</b> <u>Y</u>	
		(iii) survey grid (required by 22.426); <i>Note: Include benchmarks and horizontal controls</i>		
		(iv) location of other visible surface features or improvements (e.g., roads, buildings, gas control systems, etc.); <i>Note: Include leachate risers, manholes, monitoring wells, gas wells, etc.</i>		
		(v) the person responsible for gathering the survey data and the date survey data was taken to prepare the map. <i>Reminder: Reporting period is calendar year. Survey data should be collected to reflect the AEIR reporting period.</i>	<b>a) Name:</b> <u>Foley Aerial Services.</u> <b>b) Name of person using the data to produce contour map:</b> <u>Tate Foley, Foley Aerial Services</u> <b>c) Date survey data was collected:</b> <u>May 16, 2025</u>	

6	22.423(b)(6) 22.522(a)(6) 22.619(b)(6)	<p>Quantity, location, and characteristics of leachate collected, recirculated, and disposed.</p> <p><b>Note: Provide analytical report as Attachment C. Provide brief narrative on this form in space provided about leachate sources, how leachate is collected, measured and disposed. Also explained how the leachate head on the landfill liner is monitored and measured.</b></p>	<p>a) <b>Leachate Collected:</b> <u>0 gallons</u></p> <p>b) <b>Leachate Disposed:</b> <u>0 gallons</u></p> <p>c) <b>Leachate Recirculated:</b> <u>0 gallons</u></p> <p>d) <b>Leachate Recirculation Plan exists (Y/N)?</b> <u>N/A</u>  <b>ADEQ approval Doc #</b> <u>                    </u></p> <p>e) <b>Leachate operating records exist (Y/N)?</b> <u>N</u></p> <p>f) <b>Leachate analytical report attached (Y/N)?</b> <u>Y (see document submitted the DEQ on 8/12/24, "First Half 2024 Semi Annual Groundwater Monitoring Report and Notification of Statistically Significant Increases" and on 1/16/2025 "Second Half 2024 Groundwater Monitoring Report and Notification of Statistically Significant Increases")</u></p> <p>g) <b>Leachate narrative (collection, measurements and disposal):</b>  Leachate and stormwater at the North Landfill are collected and co-mingled and are then directed through a dual contained HDPE line to the plant's NPDES permitted wastewater treatment system. The quantity of leachate that is managed in the NPDES permitted treatment facility is not documented. In April 2023 subgrade was completed for the final cover and any additional rainfall ran off the landfill area. The leachate collection system was pumped dry during closure construction and is no longer in operation.</p> <p>h) <b>Leachate narrative (verifying &lt;1' head on liner system):</b>  N/A The leachate collection system was pumped dry during closure construction and is no longer in operation.</p>	C
7	22.423(b)(7) 22.522(a)(7) 22.619(b)(7)	<p>Maintenance of stormwater controls and best management practices for erosion control.</p> <p><b>Note: List any upset conditions during the reporting period (i.e., washouts, etc...). Also, include narrative about vegetation maintenance and repair.</b></p>	<p>a) <b>Briefly list maintenance activities and upset conditions here:</b>  Stormwater runoff that previously flowed through the active disposal area was collected by the leachate collection system on the west side of the current disposal area and directed to the plant's NPDES permitted wastewater treatment system. The site is currently under final cover. Stormwater is collected by berms and letdown structures on the final cover system and directed and outfall on the northeast corner of the site through a series of ditches. G-P performs routine maintenance at the site to minimize erosion on the landfill side slopes. Routine maintenance includes removal of silt from the drainage pathways and placement of hay bales in strategic locations. When required, seeding and mulching are used to control erosion on the landfill slopes and drainage pathways.</p>	

8	22.423(b)(8) 22.619(b)(8)	Status of capping and closure of completed areas. <b>Note: List areas with acreage that have received interim or final cover. Include total landfilled area acreage not yet under final certified closed cover.</b> <b>Note: "Certified closed" means the facility has received an approval letter from ADEQ accepting the engineer's closure certification report.</b>	a) Lndfl unit/cell <u>Stage 1</u> , <u>18.3</u> acres. Intrm or Final Cover (I/F): <u>F</u> b) Lndfl unit/cell _____ , _____ acres. Intrm or Final Cover (I/F): _____ c) Lndfl unit/cell _____ , _____ acres. Intrm or Final Cover (I/F): _____ d) Acres of disposed waste not under final certified cover: <u>18.3</u> acres. The landfill has completed final cover construction for the 18.3 acres of Stage 1. e) Acres of disposed waste area that have interim cover: <u>0</u> acres	
9	22.423(b)(9) 22.522(a)(8) 22.619(b)(9)	Status of remedial or corrective action activities. <b>Note: List corrective action events during reporting period (e.g., seeps and erosion correction, leachate spills, unauthorized waste handling and removal, etc...), and indicate whether action was taken in response to an ADEQ inspection.</b>  <b>Note: If trust fund financial assurance mechanism is utilized, the trust fund must fully fund all acres permitted.</b>	a) <b>Briefly list corrective actions events here:</b> During the four ADEQ quarterly inspections, there were no allegations of noncompliance noted at the facility. b) Were any of the corrective actions taken in response to an ADEQ inspection (Y/N)? <u>No</u> c) Current status of corrective actions: <u>N/A</u> d) Did corrective actions permanently solve the conditions (Y/N)? <u>N/A</u> Explain briefly: _____	
10	22.423(b)(10) 22.522(a)(9) 22.619(b)(10)	Updated Financial Assurance documentation as required by Chapter 14. <b>Note: Include copy of most recent financial assurance documentation as Attachment D. Also, include updated closure and post closure cost estimated as an attachment– recommend to use the Closure Costs and Post-Closure Care Costs Worksheet located at <u>ADEQ - Solid Waste - Technical Branch Home Page</u></b> <u>Specific links to the worksheets:</u> <a href="http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/closure_costs_worksheet.xlsx">http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/closure_costs_worksheet.xlsx</a> <b>and</b> <a href="http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/post_closure_care_costs_worksheet.xlsx">http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/post_closure_care_costs_worksheet.xlsx</a> . <b>Show detailed calculations of cost items in tabular format with specific item breakdowns. Also, show source of unit cost information and/or inflationary factor adjustments – use ADEQ factors where applicable. If updated unit cost information is used instead of inflationary factors, show the source of unit cost information. Confirm estimates are based on largest area ever requiring final cover.</b>	a) Size of facility property under current permit? <u>250</u> acres b) Size of actual permitted disposal area? <u>18.3</u> acres c) What is the current total permitted disposal area that contains disposed waste but is not certified closed? <u>18.3</u> acres (The Landfill is under final cover, but has not received final closure certification) d) Updated closure cost estimate amount: \$ <u>0</u> e) Is the closure cost estimate based on the largest area ever requiring closure (Y/N)? <u>N/A</u> f) Is the existing closure financial assurance adequate for acreage not yet certified closed (Y/N)? <u>N/A</u> g) Updated post closure care cost estimate amount: \$ <u>185,998</u> h) Is the existing post closure care financial assurance adequate for all permitted areas (Y/N)? <u>Y</u> i) Is the financial assurance mechanism a trust fund (Y/N)? <u>N</u> j) Are the sources of information for updated unit cost line items shown on the cost estimate calculations (Y/N)? <u>Unit costs were not updated</u> k) Do the unit cost items for soil cover material include actual third party cost of materials and labor (Y/N)? <u>Y</u>	<b>D</b>

11	22.423(b)(11) 22.522(a)(10) 22.619(b)(11)	Revised or updated facility Closure Plan in accordance with Chapter 13. <i>Note: Provide updated Closure Plan as Attachment E if facility obtained a permit modification during the reporting period that affects the closure and/or post closure care.</i>	<p>a) Was an updated Closure Plan required during this reporting period (Y/N)? <u>Y</u></p> <p>b) Is an updated Closure Plan attached herein (Y/N)? <u>N</u> (See ADEQ Doc IDs 80812 &amp; 81588).</p>	
12	22.423(b)(12) 22.522(a)(11) 22.619(b)(12)	Other items that affect compliance. <i>Note: Include an ADEQ enforcement activity summary (solid waste, water, air, hazardous waste related) and , status of operating and permit fees. Also, include brief narrative concerning groundwater monitoring reports, landfill gas, leachate recirculation, alternate daily cover, etc...</i>	<p>a) Are there current ADEQ enforcement actions (Y/N)? <u>N</u></p> <p>b) Summary of enforcement actions: _____</p> <p>c) Are operating and permit fees payments up-to-date (Y/N)? <u>Y</u> If not explain: _____ Additional Information: _____</p> <p>d) Does the facility monitor groundwater (Y/N)? <u>Y</u> If so, is it detection monitoring or assessment monitoring? <u>Detection</u></p> <p>e) What is the groundwater analytical sampling frequency? <u>6</u> months</p> <p>f) Does the facility collect landfill gas (Y/N)? <u>N</u></p> <p>g) Does the facility have a Gas Monitoring Plan (Y/N)? <u>N</u></p> <p>h) Does the facility have gas monitoring probes (Y/N)? <u>N</u></p> <p>i) Does the facility use an alternate daily cover (ADC)(Y/N)? <u>Y</u> If so, what type of ADC is used: <u>Lime waste, wastewater treatment solids, woodyard grit, and boiler ash</u> If so, list document id# approving ADC: <u>Special Condition 18 of Permit No. 0292-S3N.</u></p> <p>j) Does the facility have a Liquid Waste Management (LWM) Plan (Y/N)? <u>N</u> If so, list document id# approving the LWM Plan: _____</p> <p>k) Date and document id # of currently approved Operating Plan and Narrative: Date: <u>April 18, 2012</u> Doc#: <u>62229</u></p> <p>l) Date and document id # for currently approved Closure/ Post Closure Plan: Date: <u>Feb 1997/June 2022</u> Doc#: <u>4642, 80812</u></p> <p>m) Date and document id # of currently approved Permit Drawings: Date: <u>Feb 1997/June 2022</u> Doc#: <u>4642, 80812</u></p> <p>n) Date and document id # of currently approved Design Narrative: Date: <u>February 1997</u> Doc#: <u>4642</u></p> <p>o) Are weigh scales utilized at the landfill (Y/N)? <u>Y</u></p> <p>p) Does the final cap include a synthetic liner (Y/N)? <u>Y</u></p> <p>q) Does the final cap include clay liner (Y/N)? <u>Y</u></p> <p>r) Total current permitted landfill volume: <u>1,035,000</u> cubic yards</p>	

13	22.423(b) 22.522(a) 22.619(b)	Certification of AEIR Report: "I have inspected the landfill site and have prepared this report to reflect operational compliance with permit conditions, permit plans, specifications, narrative, and all applicable regulations"	<p><b>a) Arkansas Licensed Engineer:</b></p> <p>Sign: _____ Date: _____</p> <p><b>b) License Number:</b> <u>9199</u></p> <p><b>c) Attach seal here:</b></p> <div style="text-align: center;">   </div> <div style="text-align: center; margin-top: 20px;">  </div>	
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## Attachment A

### Photographic Log





1. Southeast Corner of landfill



2. Northeast corner of landfill





3. West slope of landfill



4. Top of landfill



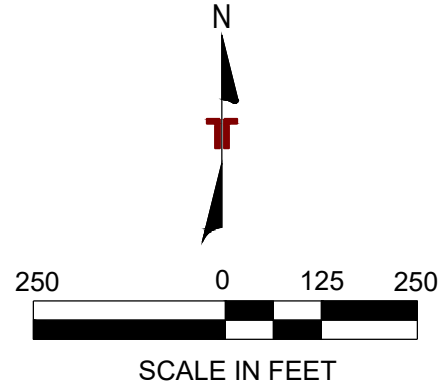
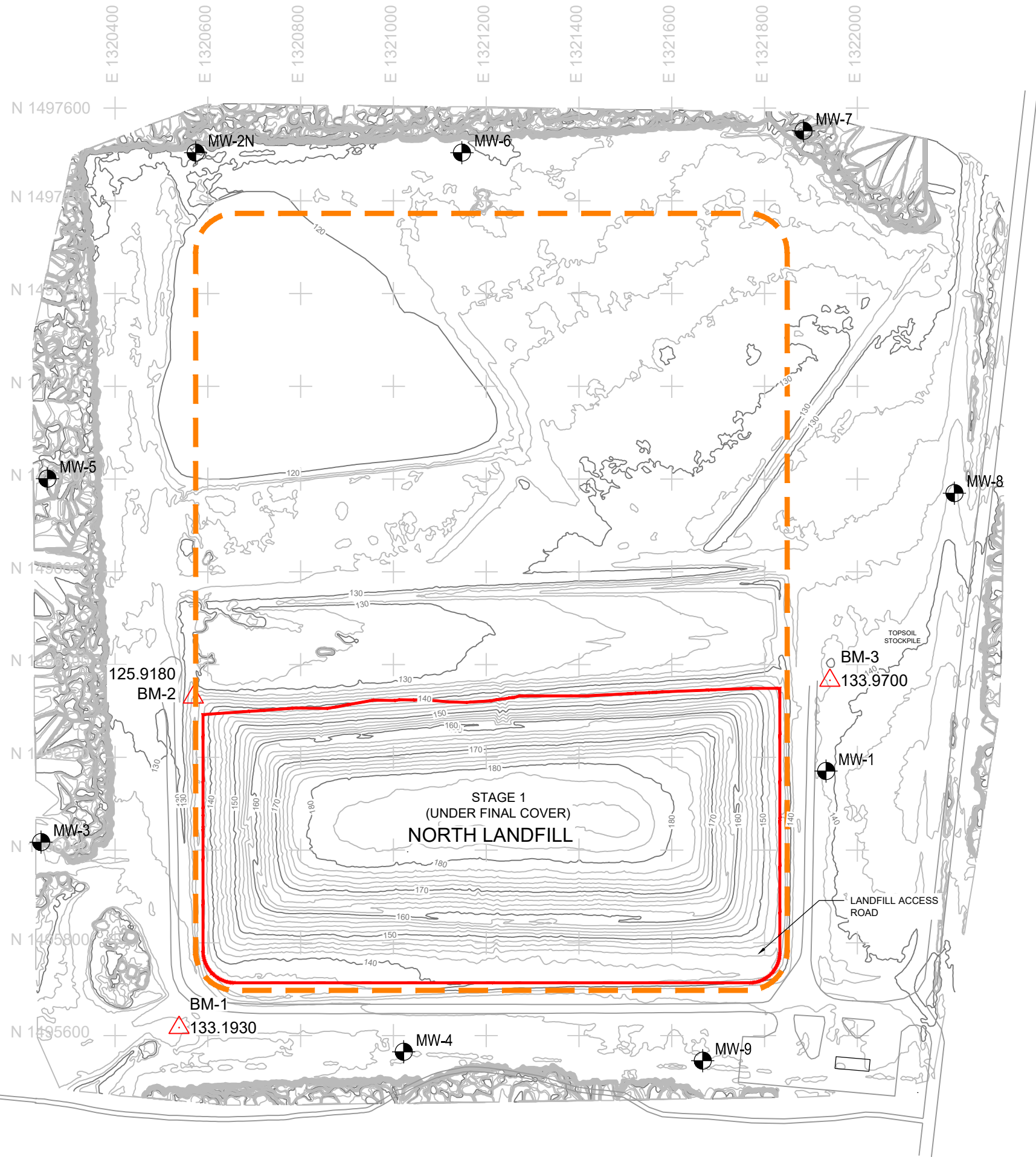


5. North slope of landfill

## Attachment B

### Updated Drawings

N:\SECARCHIVE\CAD\03\1001\3525704\NORTH LANDFILL\01 - NORTH LE SITE LAYOUT MAP 2024.DWG



BENCHMARK COORDINATE TABLE			
PT. NO.	NORTHING	EASTING	ELEVATION
BM-1	1495617.1808	1320537.7797	132.8660
BM-2	1496329.8244	1320568.6562	125.5836
BM-3	1496365.7697	1321940.7185	133.6424

ARKANSAS SOUTH ZONE (0302), US SURVEY FEET  
NAVD88 VERTICAL DATUM

NOTE:  
STAGE 1 AREA SURVEY PERFORMED BY FOLEY  
AERIAL SERVICES ON MAY 16, 2025.

## LEGEND

- BM-1 SITE BENCHMARK
- MW-1 GROUNDWATER MONITORING WELL
- PERMITTED LANDFILL BOUNDARY
- LIMITS OF WASTE
- EXISTING GRADE CONTOURS

REV	DATE	BY	DESCRIPTION

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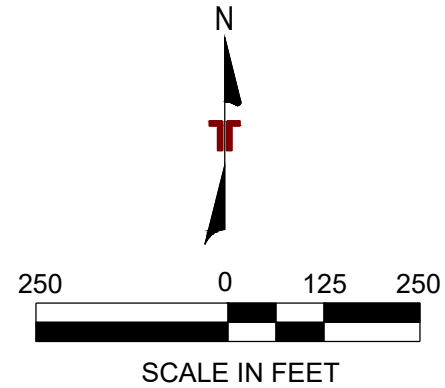
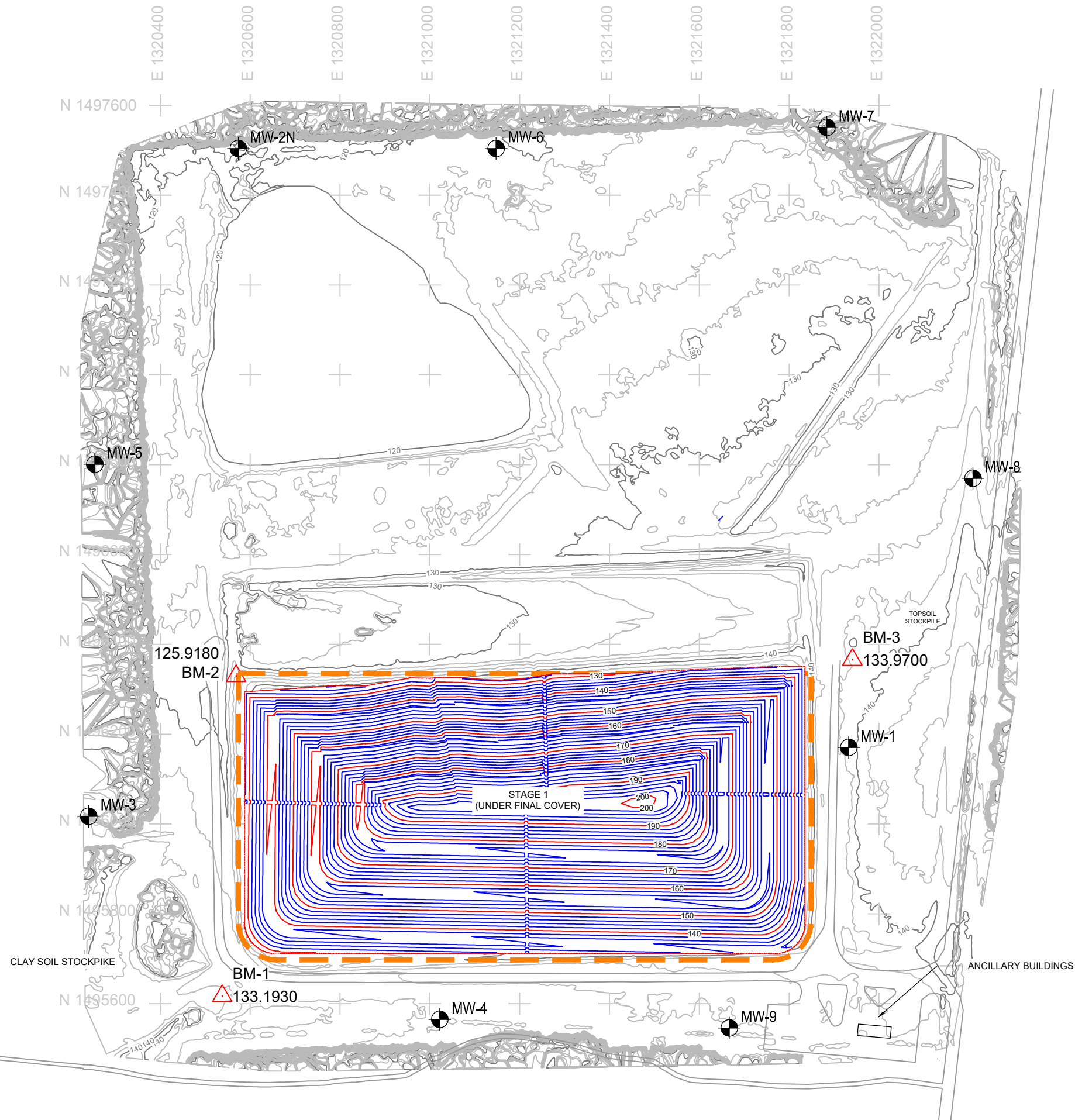
SITE LAYOUT MAP
2024 ANNUAL ENGINEERING REPORT
GEORGIA-PACIFIC CROSSETT LLC
CLASS 3N LANDFILL - NORTH
CROSSETT
ARKANSAS

<b>Terracon</b>
Consulting Engineers and Scientists
26809 I-30 SOUTH PH: (501) 847-9292
BRYANT, AR 72022 FAX: (501) 847-9210

FIGURE 1	
DESIGNED BY:	TLB
DRAWN BY:	TLB
APPVD. BY:	DCM
SCALE:	SEE SCALE
DATE:	6/13/2025
JOB NO.	031-001-3525704
ACAD NO.	001
SHEET NO.:	1 OF 2



N:\GECARCHIVE\CAD\031001-352570\NORTH LANDFILL\02 - NORTH L.F. PERMITTED FINAL WASTE GRADES 2024.DWG



BENCHMARK COORDINATE TABLE			
PT. NO.	NORTHING	EASTING	ELEVATION
BM-1	1495617.1808	1320537.7797	132.8660
BM-2	1496329.8244	1320568.6562	125.5836
BM-3	1496365.7697	1321940.7185	133.6424

ARKANSAS SOUTH ZONE (0302), US SURVEY FEET  
NAVD88 VERTICAL DATUM

## LEGEND

- BM-1 SITE BENCHMARK
- MW-1 GROUNDWATER MONITORING WELL
- PERMITTED LANDFILL BOUNDARY
- LIMITS OF WASTE
- EXISTING GRADE CONTOURS
- PERMITTED FINAL GRADE CONTOURS

REV	DATE	BY	DESCRIPTION

PERMITTED TOP OF WASTE GRADES  
2024 ANNUAL ENGINEERING REPORT  
**GEORGIA-PACIFIC CROSSETT LLC**  
CLASS 3N LANDFILL - NORTH  
CROSSETT ARKANSAS

**Terracon**  
Consulting Engineers and Scientists  
25809 I-30 SOUTH BRYANT, AR 72022  
PH. (501) 847-9292 FAX. (501) 847-9210

FIGURE 2	
DESIGNED BY:	TLB
DRAWN BY:	TLB
APPVD. BY:	DCM
SCALE:	SEE SCALE
DATE:	6/13/2025
JOB NO.	031-001-35257048
ACAD NO.	002
SHEET NO.:	2 OF 2

## Attachment C

### Leachate Analytical Report

(See DEQ Doc uploaded 8/12/2024 "First Half 2024 Semi Annual Groundwater Monitoring Report and Notification of Statistically Significant Increases" and 1/16/25 "Second Half 2024 Groundwater Monitoring Report and Notification of Statistically Significant Increases")

## Attachment D

### Updated Financial Assurance

**CLOSURE COST ESTIMATE - YEAR 2024**  
**Georgia-Pacific Consumer Operations LLC**  
**Class 3N Landfill - North**

ITEM	QUANTITY	UNIT	UNIT PRICE	AMOUNT
Surface Preparation	0.0	AC	\$2,000	\$0
Gas Venting Layer	0	LS	\$0	\$0
Clay Cover (1-foot thick)	0	CY	\$5.00	\$0
Synthetic Liner	0	SF	\$0.75	\$0
Gas Vents	0	EA	\$600	\$0
Drainage Layer	0	SF	\$0.70	\$0
Vegetative Support Layer	0	CY	\$4.50	\$0
Vegetation/Soil Top Layer (min. 6-inches thick)	0	CY	\$4.50	\$0
Fine Grading of Topsoil	0	SF	\$0.25	\$0
Seeding/Fertilizing/Mulching	0.0	AC	\$2,500	\$0
Erosion Control	0	LS	\$274,500	\$0
Quality Assurance/Quality Control	0	LS	\$200,000	\$0
Surveying	0	LS	\$37,000	\$0
Certification	0	LS	\$20,000	\$0
<b>TOTAL</b>				<b>\$0</b>

**Notes:**

Costs are Terracon engineering estimates in 2020 dollars. Estimates are based on prior contractor bids and construction costs for construction projects, sampling, and maintenance work on similar sites in the state of Arkansas.

N/A = Not Applicable

The North Landfill began closure in 2023 and is currently under final cover.

**CLOSURE COST INFLATION ADJUSTMENT**

Year	2021	2022	2023	2024	2025	2026
Implicit Price Deflator*	1.017	1.062	1.065	1.027		
Adjusted Closure Cost Estimate	\$0	\$0	\$0	\$0		

\* Source: <https://www.adeq.state.ar.us/sw/permits/financial.aspx>



**POST-CLOSURE CARE COST ESTIMATE - YEAR 2024**  
**Georgia-Pacific Consumer Operations LLC**  
**Class 3N Landfill - North**

<b>TABLE A</b>				
<b>ANNUAL MISC. REPAIRS (SUBSIDENCE, SETTLING, EROSION, ROADS, ETC.) (2020 Dollars)</b>				
<b>ITEM</b>	<b>QUANTITY</b>	<b>UNIT</b>	<b>UNIT PRICE</b>	<b>AMOUNT</b>
Labor (3 people x 8 hr/day x 5 days/yr)	120	Hours	\$30	\$3,600
Equipment- Dozer	40	Hours	\$125	\$5,000
Dump Truck	40	Hours	\$80	\$3,200
Loader	40	Hours	\$85	\$3,400
Misc. Materials and Services <sup>1</sup>	2	LS	\$20,500	\$41,000
<b>TOTAL ESTIMATED ANNUAL MISC. REPAIRS</b>				<b>\$56,200</b>

<b>TABLE B</b>				
<b>ANNUAL MAINTENANCE/OPERATION OF LEACHATE COLLECTION SYSTEM (2020 Dollars) <sup>2</sup></b>				
<b>ITEM</b>	<b>QUANTITY</b>	<b>UNIT</b>	<b>UNIT PRICE</b>	<b>AMOUNT</b>
Annual Maintenance and Repair of System	N/A	LS	N/A	\$0
Leachate Collection Costs	N/A	\$/gal	N/A	\$0
Annual Transportation Costs	N/A	\$/gal	N/A	\$0
Annual Treatment Costs	N/A	\$/gal	N/A	\$0
<b>TOTAL ESTIMATED ANNUAL LEACHATE SYSTEM O&amp;M</b>				<b>\$0</b>

**Notes:**

1 - Includes erosion control devices, repairing cap, and seeding repaired areas.

2 - The leachate system was pumped dry during final cover construction and a composite liner cover was installed. The leachate collection system is no longer in operation.

3 - Costs are Terracon engineering estimates in 2020 dollars. Estimates are based on prior contractor bids and construction costs for construction projects, sampling, and maintenance work on similar sites in the state of Arkansas.

**POST-CLOSURE CARE COST ESTIMATE - YEAR 2024**  
**Georgia-Pacific Consumer Operations LLC**  
**Class 3N Landfill - North**

<b>TABLE C</b>				
<b>ANNUAL MAINTAINENANCE/OPERATION OF GROUNDWATER MONITORING SYSTEM (2020 Dollars)</b>				
<b>ITEM</b>	<b># of Wells</b>	<b>UNIT</b>	<b>Cost/Well</b>	<b>AMOUNT</b>
Annual Sampling Costs (2/year)	9	Well	\$425.00	\$3,825
Annual Laboratory Analysis (2/year)	9	Well	\$1,300.00	\$11,700
Statistical Analysis (2/year)	2	Report	\$3,500.00	\$7,000
<b>TOTAL ESTIMATED ANNUAL GW MONITORING SYSTEM COSTS</b>				<b>\$22,525</b>

<b>TABLE D</b>				
<b>ANNUAL MAINTAINENANCE/OPERATION OF GAS MONITORING SYSTEM (2020 Dollars)</b>				
<b>ITEM</b>	<b># of Locations</b>	<b>UNIT</b>	<b>Cost/Probe</b>	<b>AMOUNT</b>
Annual Maintenance and Repair	N/A	N/A	N/A	\$0
Sampling/Analysis Costs (4/year)	N/A	EA	N/A	\$0
<b>TOTAL ESTIMATED ANNUAL GAS MONITORING SYSTEM COSTS</b>				<b>\$0</b>

<b>TOTAL ESTIMATED ANNUAL POST-CLOSURE CARE COSTS:</b>	<b>\$78,725</b>
<b>TOTAL ESTIMATED POST-CLOSURE CARE COSTS (2-YEAR PERIOD<sup>1</sup>):</b>	<b>\$157,450</b>

**Notes:**

N/A = Not Applicable

1 - Post-Closure Care period is two years.

2 - Costs are Terracon engineering estimates in 2020 dollars. Estimates are based on prior contractor bids and construction costs for construction projects, sampling, and maintenance work on similar sites in the state of Arkansas.

**CLOSURE COST INFLATION ADJUSTMENT**

<b>Year</b>	<b>2021</b>	<b>2022</b>	<b>2023</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
<b>Implicit Price Deflator*</b>	<b>1.017</b>	<b>1.062</b>	<b>1.065</b>	<b>1.027</b>		
<b>Adjusted Closure Cost Estimate</b>	<b>\$160,127</b>	<b>\$170,055</b>	<b>\$181,108</b>	<b>\$185,998</b>		

\* Source: <https://www.adeq.state.ar.us/sw/permits/financial.aspx>