



**DIVISION OF
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

September 3rd, 2025

Electronic Mail Only

Sarah M. Ross
Georgia-Pacific Consumer Operations
P.O. Box 3333
Crossett, AR 71635

RE: Review of Second Half 2024 and First Half 2025 Groundwater Monitoring Reports Georgia-Pacific Landfill Class 3N

Permit No: 0292-S3N

AFIN: 02-00013

Dear Ms. Ross,

The Division of Environmental Quality, Office of Land Resources (DEQ) has reviewed the Second Half 2024 and First Half 2025 Groundwater Monitoring Reports for the Georgia-Pacific Landfill – Class 3N, sent January 16, 2025 and August 8, 2025, by Matt Acree of Terracon Inc. and has the following comments:

1. Figure 2 of the Second Half 2024 Groundwater Monitoring Report contains the potentiometric map of the landfill. In this figure, a flow direction arrow is pointing south at monitoring well MW-6. If groundwater were to flow in this direction, the potentiometric surface lines indicate that it would be moving upgradient. Please correct this on all future groundwater monitoring reports.
2. Elevated concentrations of total dissolved solids, chloride, sulfate, and manganese have been regularly documented at this site. Due to their association with paper mills and as allowed by 8 CAR § 60-1204(a)(3)(C)(ii), please sample and analyze for chloroform and carbon disulfide in each well and leachate for the next four (4) sampling events.
3. Per Special Condition 19 of the permit, constituents from Appendix 3 are sampled every five years and any constituent found during that event is added to the list of constituents to be analyzed during each semi annual event. Cadmium, selenium, copper, and lindane are all found on that list and have been detected at the site. Please explain why these constituents have not been analyzed and ensure they are analyzed during all future sampling events.
4. Special Condition 19 also lists 1,1-dichloroethylene as a constituent to be analyzed every five years. The last time 1,1-dichloroethylene was analyzed was in 2006. Please explain why this constituent has not been analyzed and resume analyzing every five years.
5. Elevated Method Detection Limits (MDLs) and Reporting Detection Limits (RDLs) have been noted for multiple constituents. 8 CAR § 60-1203, previously Rule 22.1203(h), states, “Any PQL or MDL that is

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used in the statistical method shall be the lowest concentration level that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions using current laboratory standards.” Please reduce the detection limits or explain why the MDLs for fluoride, nitrate, and Total Petroleum Hydrocarbons (TPH) oil and gas have been increased and why the RDL for arsenic is set at the maximum contaminant level.

6. As a reminder, per 8 CAR § 60-1203, a copy of the analytical results must be submitted directly from the contract laboratory for all groundwater sampling events. Please submit the laboratory results for the Second Half 2024 and First Half 2025 sampling events, and ensure results are sent to DEQ on all future sampling events.
7. Throughout the historical data of the site, asterisks are found next to multiple undetect results. Please explain the meaning of this symbol as it is used in the database.

Please submit a response within thirty (30) calendar days of receipt of this letter. If you have any questions or need any additional information, please contact me at (501)-682-0510 or anna.knoerr@arkansas.gov.

Sincerely,



Anna Knoerr
Geologist
Division of Environmental Quality
5301 Northshore Drive,
North Little Rock, AR 72118-5317

cc: David Jaros, Terracon Consultants
Matt Acree, Terracon Consultants
Bill Sadler, DEQ
Richard Bennett, DEQ
Greg Banic, DEQ