

Haley Griffith (adpce.ad)

Subject: RE: 2025 Annual Engineering Inspection Report (AEIR) - Green Bay Packaging, Arkansas Kraft Division Class 3N Landfill Permit No.: 0284-S3N; AFIN: 15-00001

From: Jonathan King <jking@promusengineering.com>

Sent: Monday, March 23, 2026 2:04 PM

To: Richard Bennett (adpce.ad) <richard.bennett@arkansas.gov>

Cc: Jacob Wesson <jwesson@gbp.com>; Victoria Wilson <vwilson@gbp.com>

Subject: 2025 Annual Engineering Inspection Report (AEIR) - Green Bay Packaging, Arkansas Kraft Division Class 3N Landfill Permit No.: 0284-S3N; AFIN: 15-00001

EXTERNAL SENDER: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Mr. Bennett,

See attached the 2025 AEIR for the Green Bay Packaging Class 3N Landfill. If I need to also submit this through Eportal, let me know. I remember us having issues with those submissions last year through Eportal, so I thought this might be easier. Lastly, the financial assurance should be in the mail tomorrow morning, if you have any questions or require additional information, do not hesitate to reach out.

Thanks!

Jonathan B. King, P.E.

Project Engineer | Promus Engineering, LLC

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2025 ANNUAL ENGINEERING INSPECTION REPORT

Green Bay Packaging – Arkansas Kraft Class 3N Landfill Morrilton, Arkansas

Permit No. 0284-S3N
AFIN: 15-00001

March 23, 2026
Promus Project No. 260105

Prepared for:
Green Bay Packaging Inc. – Arkansas Kraft Division

Prepared by:



PROMUS
ENGINEERING

ANNUAL ENGINEERING INSPECTION REPORT (AEIR) FORM

Reporting Year: 2025

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

Facility Name: Green Bay Packaging – Arkansas Kraft Division AFIN: 15-00001 Permit #: 0284-S3N Landfill Class: 3N

Report Submittal Date: March 23, 2026 Date of Landfill Site Inspection by Certifying Engineer: February 19, 2026

***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>84,640</u> cubic yards	
		Projected date of opening new cell.	b) Date: <u>April-May 2026</u>	
2	22.423(b)(2) 22.522(a)(2) 22.619(b)(2)	Remaining volume of all permitted units.	a) <u>1,489,751</u> cubic yards	
		Total air space used during the reporting period.	b) <u>55,901</u> cubic yards	
		Estimated remaining site life (years) based on utilization rate during the reporting period. <i>Note: Itemize current permitted unit/cell information - use attachment if necessary.</i>	c) Landfill Unit/Cell remaining life: Landfill unit/cell <u>Areas 1-3</u> , <u>0</u> years. Landfill unit/cell <u>Areas 4 & 5</u> , <u>1.5</u> years. Landfill unit/cell <u> </u> , <u> </u> years. d) Entire permitted landfill: <u>25.8*</u> years remaining life. <i>*Based on the 5-year average of 57,769 cy/yr of net volume placed.</i>	
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. <i>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.</i>	a) Progression narrative: <u>Waste is currently being placed along the north and eastern portions of Area 5. Fill progression is from southwest to northeast. Area 4 is generally at capacity except for a portion of the north slope, with vegetation covering the north, south, and west interim slopes. Area 5 is approximately 87% filled.</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. Note: Review current operating plans, and permit conditions. Include photographs of engineer's 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.	a) Weekly/monthly operational logs exist (Y/N)? <u>Y</u> b) Photos of AEIR inspection attached (Y/N)? <u>Y</u> c) Waste volume in and out records exist (Y/N)? <u>Y</u> d) Unauthorized waste forms exist (Y/N)? <u>Y</u> e) Daily/weekly cover adequate at time of inspection (Y/N)? <u>Y</u> f) Alternative Daily Cover (ADC) Plan located onsite (Y/N)? <u>Y</u> Operations in compliance with ADC Plan (Y/N)? <u>Y</u> g) Liquid Waste Management (LWM) Plan located onsite (Y/N)? <u>N/A</u> Operations in compliance with LWM Plan (Y/N)? <u>N/A</u> h) Liquids received to be bulked during reporting period: <u>N/A</u> gallons <u>N/A</u> tons i) Waste cover of inactive areas maintained adequately (Y/N)? <u>Y</u> j) Net amount of waste disposed in landfill during reporting period: <u>221,951*</u> cubic yards <u>N/A</u> tons *Note: Net amount of waste disposed is reported in uncompacted cubic yards. Airspace consumed in cubic yards is reported on Line 2b. k) Leachate head level less than 1' on liner at time of inspection (Y/N)? <u>Y</u>	A
5	22.423(b)(5) 22.522(a)(5) 22.619(b)(5)	Updated contour map that depicts: Note: Provide updated drawing(s) and final cover permit drawing as Attachment B – discuss any discrepancies. Max. contour interval = 2 feet)	a) Updated contour drawing attached (Y/N)? <u>Y</u> b) Final cover permit drawing attached (Y/N)? <u>Y</u> c) List all discrepancies here: <u>No discrepancies observed.</u> d) Is there an overfill condition (Y/N)? <u>N</u>	B
		(i) horizontal and vertical extent of active and inactive fill areas;		
		(ii) status of all permitted units/cells; (Note: Label all active (working face, bulking area, stockpiles), inactive, closed and interim cover areas).	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)? <u>Y</u> b) If not, where will deficiency shortfalls be obtained (be specific)? <u>N/A</u> c) Is the current Design Narrative earthwork balance accurate (Y/N)? <u>Y</u> <u>Based on the permitted plans, the stockpiled soils located east of Area 5 and south of the closed area contain a sufficient quantity to support the remaining construction and operation of the landfill.</u>	
		(iii) survey grid (required by 22.426); Note: Include benchmarks and horizontal controls		
		(iv) location of other visible surface features or improvements (e.g., roads, buildings, gas control systems, etc.); Note: Include leachate risers, manholes, monitoring wells, gas wells, etc.		

		(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>	a) Name: <u>Mason Surveying & Consulting, Inc</u> b) Name of person using the data to produce contour map: <u>Johnny Mason, PE,PS</u> c) Date survey data was collected: <u>February 16, 2026</u>	
6	22.423(b)(6) 22.522(a)(6) 22.619(b)(6)	Quantity, location, and characteristics of leachate collected, recirculated, and disposed. 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.	a) Leachate Collected: <u>57,581,984</u> gallons b) Leachate Disposed: <u>57,581,984</u> gallons c) Leachate Recirculated: <u>N/A</u> gallons d) Leachate Recirculation Plan exists (Y/N)? <u>N/A</u> ADEQ approval Doc # <u>N/A</u> e) Leachate operating records exist (Y/N)? <u>N</u> f) Leachate analytical report attached (Y/N)? <u>N, the leachate analytical data was included as part of the semi-annual groundwater monitoring reports submitted during the reporting period. 1st Half – 7.1.2025 and 2nd Half – 12.15.2025.</u> g) Leachate narrative (collection, measurements, and disposal): <u>Areas 1-5 of the active landfill were constructed with a waste containment berm around the entire perimeter of the landfill. Leachate generated within each area flows to a center collection corridor where it then gravity drains to the northern leachate lift station. The existing landfill to the south has a final cover system installed and therefore the amount of infiltration that would generate leachate is considered negligible. However, the leachate that is generated within the closed landfill is directed to the southern leachate lift station where it is pumped via forcemain to the northern leachate lift station. From the northern lift station, leachate is pumped into the plant's NPDES permitted wastewater treatment facility. The pump within the lift station is fitted with a run indicator that records the amount of time the leachate pump has operated. The pump run time is then multiplied by the pump flow rate of 461 gallons per minute to estimate the gallons of leachate disposed of during the reporting year.</u> h) Leachate narrative (verifying <1' head on liner system): <u>Leachate sumps are inspected to verify depth of leachate. Also, float switches are set to activate the sump pumps at compliance levels.</u>	C (see note)
7	22.423(b)(7) 22.522(a)(7) 22.619(b)(7)	Maintenance of stormwater controls and best management practices for erosion control. Note: List any upset conditions during the reporting period (i.e., washouts, etc...). Also, include narrative about vegetation maintenance and repair.	a) <i>Briefly list maintenance activities and upset conditions here:</i> <u>Stormwater run-on is prevented from entering the active disposal area. The Facility performs routine maintenance at the site to minimize erosion of the Landfill cover system. Routine maintenance includes the removal of silt from the drainage pathways and conduits. Also, the placement of hay bales and/or rock check dams in the drainage pathways are used to control erosion. When required, seeding and mulching are used to control erosion on the landfill slopes and drainage pathways. The Landfill slopes are mowed as needed to manage vegetative growth.</u>	

8	22.423(b)(8) 22.619(b)(8)	Status of capping and closure of completed areas. <i>Note: List areas with acreage that have received interim or final cover. Include total landfilled area acreage not yet under final certified closed cover. Note: "Certified closed" means the facility has received an approval letter from ADEQ accepting the engineer's closure certification report.</i>	a) Lndfl unit/cell <u>Area 1</u> , <u>9.5</u> acres. Intrm or Final Cover (I/F): <u>F</u> Doc#: <u>30033</u> b) Lndfl unit/cell <u>Area 2</u> , <u>8.4</u> acres. Intrm or Final Cover (I/F): <u>F</u> Doc#: <u>58876</u> c) Lndfl unit/cell <u>Area 3</u> , <u>6.3</u> acres. Intrm or Final Cover (I/F): <u>F</u> Doc#: <u>62541</u> d) Acres of disposed waste not under final certified cover: <u>23.1</u> acres <u>Areas 4 and 5 (23.1 acres) do not have interim or final cover.</u> 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. <i>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. Note: If trust fund financial assurance mechanism is utilized, the trust fund must fully fund all acres permitted.</i>	a) <i>Briefly list corrective actions events here:</i> <u>The ADEQ conducted four site inspections during the reporting period. No allegations of noncompliance were observed during the site inspections.</u> b) Were any of the corrective actions taken in response to an ADEQ inspection (Y/N)? <u>N/A</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> <i>Explain briefly:</i> _____	
10	22.423(b)(10) 22.522(a)(9) 22.619(b)(10)	Updated Financial Assurance documentation as required by Chapter 14. <i>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 ADEQ - Solid Waste - Technical Branch Home Page Specific links to the worksheets: http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/closure_costs_worksheet.xlsx and http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/post_closure_care_costs_worksheet.xlsx. . 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.</i>	a) Size of facility property under current permit? <u>185</u> acres b) Size of actual permitted disposal area? <u>100</u> acres c) What is the current total permitted disposal area that contains disposed waste but is not certified closed? <u>23.1</u> acres d) Updated closure cost estimate amount: \$ <u>2,829,061</u> e) Is the closure cost estimate based on the largest area ever requiring closure (Y/N)? <u>Y</u> f) Is the existing closure financial assurance adequate for acreage not yet certified closed (Y/N)? <u>Y</u> g) Updated post closure care cost estimate amount: \$ <u>1,054,288</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>Y</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>	D

11	22.423(b)(11) 22.522(a)(10) 22.619(b)(11)	Revised or updated facility Closure Plan in accordance with Chapter 13. 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.	a) Was an updated Closure Plan required during this reporting period (Y/N)?: <u>Y</u> b) Is an updated Closure Plan attached herein (Y/N)? <u>N</u> <u>The Closure Plan was updated and submitted as part of a Minor Permit Modification Application submitted to the DEQ 6.5.2025 and approved on 9.18.2025</u>	
12	22.423(b)(12) 22.522(a)(11) 22.619(b)(12)	Other items that affect compliance. 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...	a) Are there current ADEQ enforcement actions (Y/N)? <u>N</u> b) Summary of enforcement actions: <u>N/A</u> c) Are operating and permit fees payments up-to-date (Y/N)? <u>Y</u> If not explain: _____ Additional Information: d) Does the facility monitor groundwater (Y/N)?: <u>Y</u> If so, is it detection monitoring or assessment monitoring?: <u>Detection</u> e) What is the groundwater analytical sampling frequency? <u>6</u> months f) Does the facility collect landfill gas (Y/N)?: <u>N</u> g) Does the facility have a Gas Monitoring Plan (Y/N)? <u>N</u> h) Does the facility have gas monitoring probes (Y/N)? <u>N</u> i) Does the facility use an alternate daily cover (ADC)(Y/N)? <u>Y</u> If so, what type of ADC is used: <u>Wastewater filter cake “press sludge” & wood bark residue.</u> If so, list document id# approving ADC: <u>General Condition (20) of the permit and Doc#: 60468.</u> 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: <u>N/A</u> k) Date and document id # of currently approved Operating Plan and Narrative: Date: <u>09/2020</u> Doc#: <u>78965</u> Date: <u>10/2020</u> Doc#: <u>79084</u> l) Date and document id # for currently approved Closure/ Post Closure Plan: Date: <u>9/18/2025</u> Doc#: <u>N/A</u> m) Date and document id # of currently approved Permit Drawings: Date: <u>11/1995</u> Doc#: <u>28317</u> n) Date and document id # of currently approved Design Narrative: Date: <u>12/1995</u> Doc#: <u>28002</u> o) Are weigh scales utilized at the landfill (Y/N)? <u>N</u> p) Does the final cap include a synthetic liner (Y/N)? <u>N</u> q) Does the final cap include clay liner (Y/N)? <u>Y</u> r) Total current permitted landfill volume: <u>4,172,662</u> cubic yards	

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"	a) Arkansas Licensed Engineer: Sign: <u>Jonathan King</u> Date: <u>3/23/2026</u> b) License Number: <u>14977</u> c) Attach seal here:  	
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Attachment A

Photographic Log



PHOTOGRAPHIC LOG



Photo No. 1

Looking northeast at the active working face in Area 5.

Photo No. 2
Looking northwest at the active working face in Area 5.



Photo No. 3

Looking south at the active working face in Area 5.

PHOTOGRAPHIC LOG



Photo No. 4

Looking north at the future Area 6 construction, located between Area 3 and Area 4.

Photo No. 5
Looking west at the northern slopes of Areas 1-3.



Photo No. 6

Looking east at the southern slope of Area 4-5.

PHOTOGRAPHIC LOG



Photo No. 7

Vertical leachate sump riser located on the south side of the existing closed landfill.



Photo No. 8

Northern leachate lift station located on the north end of future Area 6.



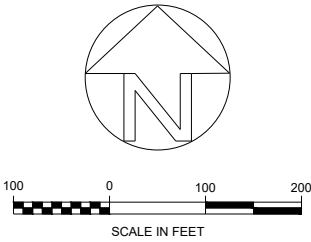
Photo No. 9

Looking south at the active working face in Area 5.

Attachment B

Updated Drawings





NUMBER	NORTHING	EASTING	ELEVATION
B-11	976.0600	4088.0700	304.2000
BM-2	965.3200	3100.5400	310.6800
BM-3	950.0000	3300.0000	313.0200

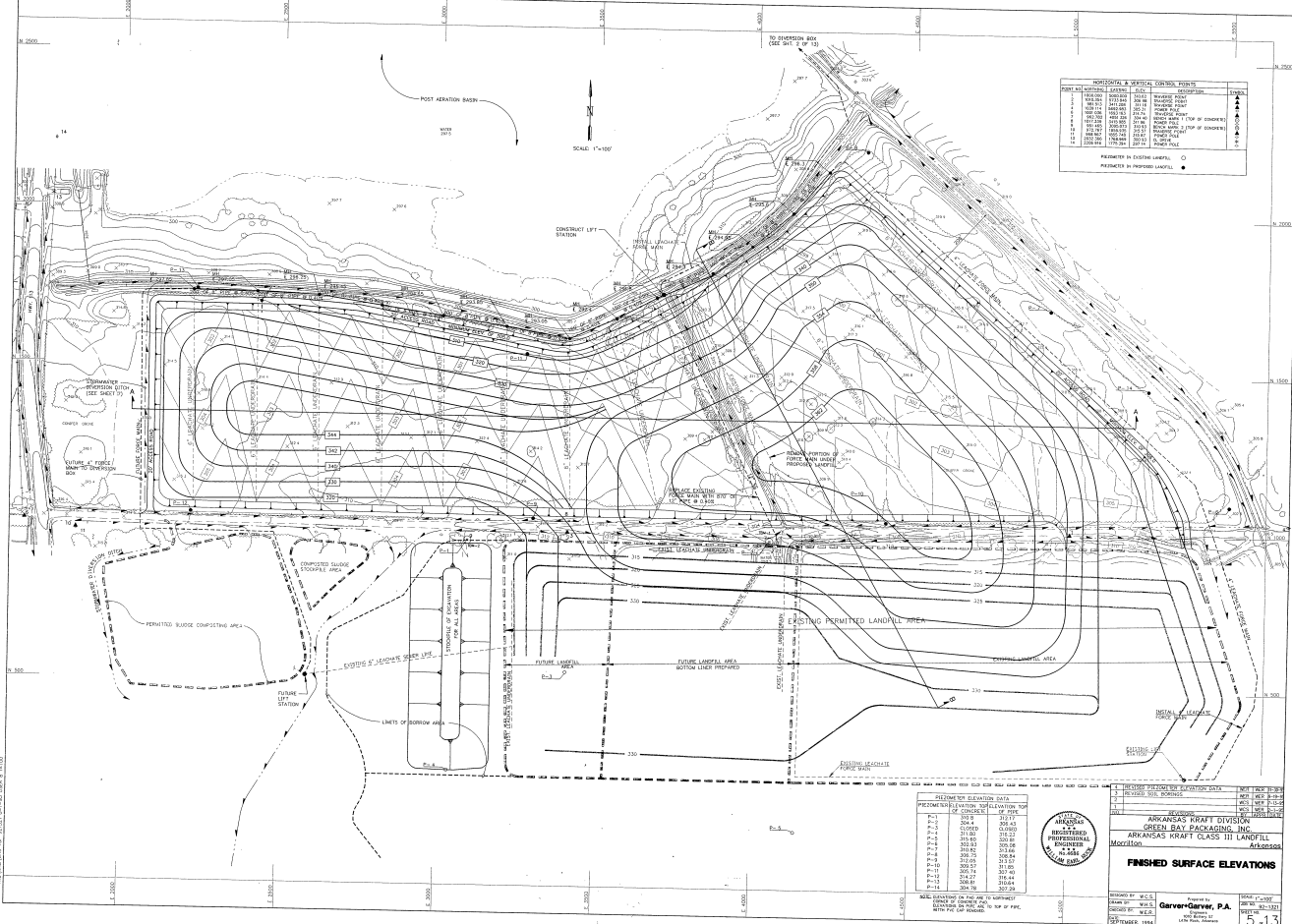
LEGEND

	PERMITTED LANDFILL BOUNDARY
	CELL BOUNDARY
	EXISTING CONTOURS
	EXISTING OVERHEAD ELECTRIC
	EXISTING POWERPOLE
	EXISTING GROUNDWATER MONITORING WELL
	EXISTING LEACHATE MANHOLE
	EXISTING SITE BENCHMARK
	EXISTING RAILROAD
	EXISTING GRAVEL PAVED ROAD
	EXISTING CLOSED LANDFILL AREA

NOTES:

1. EXISTING TOPOGRAPHY WAS OBTAINED FROM A DRONE SURVEY PERFORMED BY MASON SURVEYING AND CONSULTING, DATED FEBRUARY 16, 2026 COMBINED WITH AN AERIAL SURVEY FROM 2009.

[illegible]



4	REVISIONS PROGRAMS FOR CALCULATION DATA	NOT	PLM 8-1-81
5	REVISSED SPEC. DRAWINGS	NOT	WER 8-9-81
6		WCS	WER 7-15-81
7		WCS	WER 7-1-81
8		WCS	WER 7-1-81
9		WCS	WER 7-1-81

ARKANSAS KRAFT DIVISION
GREEN BAY PACKAGING, INC.

ARKANSAS KRAFT CLASS III LANDFILL

Morrison Arkansas

FINISHED SURFACE ELEVATIONS

DESIGNED BY W.C.S.	Approved by Garvor+Garver, P.A. Engineers 9000 Redway St Little Rock, Arkansas	SCALE: 1"=100'
DRAWN BY W.H.S.		200 NO. 42-1321
CHECKED BY W.E.R.		SHEET NO.
DWG. NO. 100-100-100		5 OF 13

Attachment D

Updated Financial Assurance



LANDFILL CLOSURE - COST ESTIMATE WORKSHEET									
OWNER: Arkansas Kraft Division				PERMIT No: 0284-53N		AFIN No: 15-00001			
OPERATOR: Green Bay Packaging Inc				ESTIMATOR: Brad N. Fureigh, P.E. (Ark. Licensed P.E. #: 14977)				DATE: June 4, 2025	
TOTAL PERMITTED WASTE DISPOSAL ACRES: ±100									
TOTAL PERMITTED ACRES CERTIFIED CLOSED: ±69.2				ACRES CURRENTLY OPEN: 23.1					
LARGEST ACREAGE EVER REQUIRING FINAL COVER OVER ACTIVE LANDFILL LIFE: ±33.0									
LANDFILL CLOSURE COST ESTIMATE WORKSHEET				Permit: 0284-53N		AFIN: 15-00001			
ITEM No.	ITEM	QUANTITY	UNITS	UNIT COST	COST	SUBTOTALS	SOURCE OF UNIT COST INFO		
1.0.0	PROFESSIONAL SERVICES								
1.1.0	Engineering (Design, Bid Documents, Procurement, Construction Contract Management)	1	Lump Sum	\$50,000	\$ 50,000		Engineer's Estimate		
1.2.0	Topographic and Boundary Survey	33	ACRE	\$915	\$ 30,195		Engineer's Estimate		
1.3.0	Engineering Services (Construction Oversight, Testing, Reporting, Certification)	1	Lump Sum	\$156,750	\$ 156,750		Engineer's Estimate		
	Professional Services Subtotal					\$ 236,945			
2.0.0	FINAL COVER								
2.1.0	Low Permeability Soil Layer								
2.1.1	Contractor Mobilization/Demobilization	1	ACRE	\$75,000	\$ 75,000		Engineer's Estimate		
2.1.2	Preparation of landfill to receive cover (final grading)	33	ACRE	\$1,500	\$ 49,500		Engineer's Estimate		
2.1.3	Geosynthetic Clay Liner	0	SQ. FT.	\$0.00	\$ -		N/A		
2.1.4	Clay, On-site (excavate, transport, place, compact) (Quantity must match earthwork balance)	106,480	CU. YD.	\$10.00	\$ 1,064,800		Engineer's Estimate		
	Low Permeability Soil Layer Subtotal					\$ 1,189,300			
2.2.0	Geomembrane and Drainage Layer								
2.2.1	Drainage material—sand	0	CU. YD.	\$0.00	\$ -		N/A		
2.2.2	Drainage material—geocomposite (purchase + install)	0	SQ. FT.	\$0.00	\$ -		N/A		
2.2.3	Geomembrane (40 mil HDPE)	0	SQ. FT.	\$0.00	\$ -		N/A		
	Geomembrane and Drainage Layer Subtotal					\$ -			
2.3.0	Protective Soil and Vegetative Layer								
2.3.1	Protective Soil, On-site (excavate, transport, place, compact) (Quantity must match earthwork balance and must be guaranteed for future availability)	0	CU. YD.	\$0.00	\$ -		N/A		
2.3.2	Protective Soil, Off-site (excavate, transport, place, compact) (Quantity must match earthwork balance)	0	CU. YD.	\$0.00	\$ -		N/A		
2.3.3	Vegetative Soil (Topsoil), On-site (excavate, transport, place) (Quantity must match earthwork balance and must be guaranteed for future availability)	0	CU. YD.	\$0.00	\$ -		N/A		
2.3.4	Vegetative Soil (Topsoil), Off-site (excavate, transport, place) (Quantity must match earthwork balance)	26,620	CU. YD.	\$20.00	\$ 532,400		Engineer's Estimate		
2.3.5	Seeding and mulching	33	ACRE	\$4,000	\$ 132,000		Engineer's Estimate		
2.3.6	Fertilizer	33	ACRE	\$750	\$ 24,750		Engineer's Estimate		
	Protective Soil and Vegetative Layer Subtotal					\$ 689,150			
3.0.0	EROSION CONTROL								
3.1.0	Temporary Stormwater Control & Management During Construction	1.0	LS	\$25,000	\$ 25,000		Engineer's Estimate		
3.2.0	Checkdams, filters, inlet/outlet protection	1	Lump Sum	\$20,000	\$ 20,000		Engineer's Estimate		
3.3.0	Grass ditching/channels	0	Lin. FT.	\$0.00	\$ -		N/A		
3.4.0	Concrete ditch lining & Concrete Culverts	0	Lin. FT.	\$0.00	\$ -		N/A		
	Erosion Control Subtotal					\$ 45,000			
4.0.0	GAS SYSTEM								
4.1.0	Gas vents, vents, _____ average depth	0	Lin. FT.	\$0.00	\$ -		N/A		
4.2.0	Passive System								
4.2.1	Passive well head flare	0	EACH	\$0.00	\$ -		N/A		
4.3.0	Active System								
4.3.1	Flare, _____ BTU/hour	0	EACH	\$0.00	\$ -		N/A		
4.3.2	Additional Well Installation	0	ACRE	\$0.00	\$ -		N/A		
4.3.4	Ancillary gas equipment (piping, blowers, condensate collection)	0	ACRE	\$0.00	\$ -		N/A		
	Gas System Subtotal					\$ -			
5.0.0	GROUNDWATER MONITORING SYSTEM								
5.1.0	Well installation		EACH	\$0.00	\$ -		N/A		
5.2.0	Upgrade existing wells	1	LS	\$5,000.00	\$ 5,000		Engineer's Estimate		
5.3.0	Dedicated pump/sampling system installation/upgrade	1	EACH	\$3,000.00	\$ 3,000		Engineer's Estimate		
5.4.0	Baseline sample collection (4 events per first year, 2 samples per event)	4	EVENT	\$4,000.00	\$ 16,000		Engineer's Estimate		
5.5.0	Baseline sample analysis and reporting (4 events per first year, 2 samples per event)	4	EVENT	\$2,500.00	\$ 10,000		Engineer's Estimate		
	Groundwater Monitoring System Subtotal					\$ 34,000			
6.0.0	LEACHATE COLLECTION SYSTEM								
6.1.0	Additional/upgrades for collection piping	0	Lin. FT	\$0.00	\$ -		N/A		
6.2.0	Additional/upgrades to pumps	2	EACH	\$3,000.00	\$ 6,000.00		Engineer's Estimate		
6.3.0	Additional/upgrades to storage containers	0	EACH	\$0.00	\$ -		N/A		
6.4.0	Baseline sample collection	1	EACH	\$5,000.00	\$ 5,000.00		Engineer's Estimate		
6.5.0	Baseline sample analysis and reporting	1	EACH	\$10,000.00	\$ 10,000.00		Engineer's Estimate		
	Leachate Collection System Subtotal					\$ 21,000			
7.0.0	OPERATIONS AND INVENTORY REMOVAL								
7.1.0	Excess solid waste	0	CU. YD.	\$0.00	\$ -		N/A		
7.2.0	Mobile equipment/machinery (e.g., containers, tanks, etc...)	0	Lump Sum	\$0.00	\$ -		N/A		
7.3.0	Stored leachate	0	GAL.	\$0.000	\$ -		N/A		
7.4.0	Contaminated soils	0	CU. YD.	\$0.00	\$ -		N/A		
	Operations and Inventory Removal Subtotal					\$ -			
8.0.0	DEMOLITION/REMOVAL SITE IMPROVEMENTS								
8.1.0	Office/shop/maintenance and other ancillary buildings	0	Lump Sum	\$0	\$ -		N/A		
8.2.0	Equipment to be decommissioned (e.g., weigh scales, bulking/volatilization pits, collection pits/sumps, piping, etc...)	1	Lump Sum	\$25,000	\$ 25,000		Engineer's Estimate		
8.3.0	Site Utilities	1	Lump Sum	\$10,000	\$ 10,000		Engineer's Estimate		
	Demolition/Removal Site Improvements Subtotal					\$ 35,000			
9.0.0	REPLACE/REBUILD SITE ACCESS CONTROLS								
9.1.0	Fencing	0	Lin. FT.	\$0	\$ -		N/A		
9.2.0	Gates	2	Lump Sum	\$20,000	\$ 40,000		Engineer's Estimate		
9.3.0	Access barriers	2	Lump Sum	\$5,000	\$ 10,000		Engineer's Estimate		
9.4.0	20' Wide Perimeter Access road	1,000	LF	\$150	\$ 150,000		Engineer's Estimate		
	Replace/Rebuild Site Access Controls Subtotal					\$ 200,000			
10.0.0	BORROW AREA RECLAMATION								
10.1.0	Regrade and site prep	5	ACRE	\$7,000	\$ 35,000		Engineer's Estimate		
10.2.0	Soil, On-site (excavate, transport, place, compact)	0	CU. YD.	\$0.00	\$ -		N/A		
10.3.0	Soil, Off-site (excavate, transport, place, compact)	0	CU. YD.	\$0.00	\$ -		N/A		
10.4.0	Seeding and mulching	5	ACRE	\$4,000	\$ 20,000		Engineer's Estimate		
10.5.0	Fertilizer	5	ACRE	\$750	\$ 3,750		Engineer's Estimate		
	Borrow Area Reclamation Subtotal					\$ 58,750			
	Total Closure Cost Subtotal					\$ 2,509,145			
11.0.0	MISCELLANEOUS								
11.1.1	Administration and Contingency	1	LS	\$250,915	\$ 250,915		Approximately 10% of Total Closure Cost		
	Misc. Subtotal					\$ 250,915			
	TOTAL CURRENT CLOSURE COST					\$ 2,760,060			
12.0.0	ANNUAL INFLATION FACTOR ADJUSTMENTS								
12.1.0	2025 Inflation Adjustment			Year	Inflation	Adjusted Total			
				2025	1.025	\$ 2,829,061	http://www.adeq.state.ar.us/sw/permits/financial.aspx		

LANDFILL POST-CLOSURE CARE - ANNUAL COST ESTIMATE WORKSHEET

OWNER: Arkansas Kraft Division	PERMIT NO. 0284-S3N	AFIN: 15-00001
OPERATOR: Green Bay Packaging Inc	ESTIMATOR: Brad N. Fureigh, P.E. (Ark. Licensed P.E. #: 14977)	DATE: June 4, 2025
TOTAL PERMITTED WASTE DISPOSAL ACRES: ±100		
TOTAL PERMITTED ACRES CERTIFIED CLOSED: ±69.2		

LANDFILL POST-CLOSURE CARE - ANNUAL COST ESTIMATE WORKSHEET Permit: 0284-S3N AFIN: 15-00001

ITEM No.	ITEM	QUANTITY	UNITS	UNIT COST	COST	SUBTOTALS	SOURCE OF UNIT COST INFO
1.0.0	PROFESSIONAL SERVICES						
1.1.0	Engineering (Annual inspection and reporting, corrective action design and bid, contract management)	1	Lump Sum	\$4,500	\$ 4,500		Engineer's Estimate
1.2.0	Topographic and Boundary Survey (annual, final, and corrective action, if required)	1	Lump Sum	\$3,500	\$ 3,500		Engineer's Estimate
1.3.0	Corrective Action Engineering Services (Construction Oversight, Testing, Reporting, Certification)	1	Lump Sum	\$60,000	\$ 60,000		Engineer's Estimate
	Professional Services Annual Subtotal					\$ 68,000	
2.0.0	FINAL COVER ROUTINE MAINTENANCE						
2.1.0	Inspect soil cover, vents, flares, drainage letdowns and outfalls, etc...	2	EVENT	\$5,000	\$ 10,000		Engineer's Estimate
2.2.0	Mowing/Trimming (100 acres twice per year)	200	ACRE	\$60	\$ 12,000		Engineer's Estimate
2.3.0	Clean Drain/Vent Openings	0	EVENT	\$0	\$ -		N/A
	Final Cover Routine Maintenance Annual Subtotal					\$ 22,000	
3.0.0	FINAL COVER REPAIRS						
3.1.0	Remove/incorporate unacceptable materials (e.g., dead vegetation, solid waste)	10	ACRE	\$55	\$ 550		Engineer's Estimate
3.2.0	Scarify and prepare surface	10	ACRE	\$1,500	\$ 15,000		Engineer's Estimate
3.3.0	Soil, On-Site (excavate, transport, place, compact)	32,267	CU. YD.	\$7.00	\$ 225,867		Engineer's Estimate
3.4.0	Soil, Off-site (excavate, transport, place, compact)		CU. YD.	\$0.00	\$ -		N/A
3.5.0	Seeding and mulching	10	ACRE	\$2,500	\$ 25,000		Engineer's Estimate
3.6.0	Fertilizer	10	ACRE	\$500	\$ 5,000		Engineer's Estimate
	Final Cover Repairs Annual Subtotal					\$ 271,417	
4.0.0	ACCESS ROADS REPAIRS						
4.1.0	Reshape/regrade subgrade	1,000	SQ. FT.	\$2.30	\$ 2,300		Engineer's Estimate
4.2.0	Gravel (transport, place, compact)	37	TON	\$45	\$ 1,667		Engineer's Estimate
4.3.0	Drainage Structures (e.g., culverts,	0	LS	\$0	\$ -		N/A
4.4.0	Concrete lined ditching/channels	0	LS	\$0	\$ -		N/A
	Access Roads Repair Annual Subtotal					\$ 3,967	
5.0.0	SURFACE WATER MANAGEMENT OPERATION AND MAINTENANCE (O&M)						
5.1.0	Collection system operation and maintenance (ditches, piping conveyances, outfalls, sampling points repair/replace)	0	Lump Sum	\$0	\$ -		N/A
5.2.0	Stormwater storage (sediment pond) operation/repairs	0	Lump Sum	\$0	\$ -		N/A
5.3.0	Sample collection	0	EVENT	\$0	\$ -		N/A
5.4.0	Sample analysis and reporting	0	EVENT	\$0	\$ -		N/A
	Surface Water Management O&M Annual Subtotal					\$ -	
6.0.0	LEACHATE COLLECTION SYSTEM O&M						
	Generation Rate = 35,000,000 gal/yr.						
6.1.0	Collection operation/maintenance (pump, piping, storage...operation/repair/replace)	1	YEAR	\$3,500	\$ 3,500		Engineer's Estimate
6.2.0	Leachate loading, off-loading and off-site transportation		EVENT	\$0.00	\$ -		N/A
6.3.0	Leachate Treatment/Disposal	0	GAL.	\$0.000	\$ -		N/A
6.4.0	Additional/upgrades for piping, pumps and storage	0	Lump Sum	\$0	\$ -		N/A
6.5.0	Leachate sample collection	0	YEAR	\$0	\$ -		N/A
6.6.0	Leachate sample analysis and reporting	1	YEAR	\$3,500	\$ 3,500		Engineer's Estimate
	Leachate Collection System O&M Annual Subtotal					\$ 7,000	
7.0.0	GROUNDWATER MONITORING SYSTEM O&M						
	Number of Wells in Approved System = 11						
7.1.0	Well maintenance (e.g., protective casing (lock & hinges) repair/replacement, well pad repair/replace, etc...)	1	LS	\$1,350	\$ 1,350		Engineer's Estimate
7.2.0	Upgrade/redevelop existing wells	1	LS	\$1,100	\$ 1,100		Engineer's Estimate
7.3.0	Well Replacement	1	LS	\$1,100	\$ 1,100		Engineer's Estimate
7.4.0	Sample collection (2 events per year)	2	EVENT	\$5,300	\$ 10,600		Engineer's Estimate
7.5.0	Sample analysis and reporting (2 events per year)	2	EVENT	\$14,500	\$ 29,000		Engineer's Estimate
	Groundwater Monitoring System O&M Annual Subtotal					\$ 43,150	
8.0.0	GAS MONITORING SYSTEM O&M						
8.1.0	Number of Gas Monitoring Probes/Wells						
8.2.0	Methane monitoring of probes/wells (4 per year)	0	EVENT	\$2,300	\$ -		N/A
8.3.0	Methane monitoring at site boundary and structures (4 per year)	0	EVENT	\$1,700	\$ -		N/A
8.4.0	Sample analysis and reporting	0	EVENT	\$550	\$ -		N/A
	Gas Monitoring System O&M Annual Subtotal					\$ -	
9.0.0	GAS EXTRACTION SYSTEM O&M						
9.1.0	Passive System						
9.1.1	Passive well head flare maintenance	0	EACH	\$0	\$ -		N/A
9.2.0	Active System						
9.2.1	Flare	0	EACH	\$0	\$ -		N/A
9.2.2	Additional Well Installation/Upgrades	0	EACH	\$0	\$ -		N/A
9.2.3	Ancillary gas equipment repair/replacement (piping, blowers, condensate collection)	0	Lump Sum	\$0	\$ -		N/A
	Gas Extraction System O&M Annual Subtotal					\$ -	
10.0.0	CORRECTIVE ACTION EVALUATION AND IMPLEMENTATION						
10.1.0	Resurvey monitoring well reference points and site benchmarks (prorate for annual expenses)	1	EACH	\$2,500	\$ 2,500		Engineer's Estimate
10.2.0	Remove sediments from stormwater basin(s) (prorate for annual expenses)	1	EACH	\$4,000	\$ 4,000		Engineer's Estimate
10.3.0	Groundwater exceedances statistical evaluation	1	EACH	\$5,000	\$ 5,000		Engineer's Estimate
10.4.0	Groundwater alternate source determination) (prorate for annual expenses)	1	EACH	\$7,500	\$ 7,500		Engineer's Estimate
10.5.0	Groundwater compliance monitoring (prorate for annual expense)	11	EACH	\$3,000	\$ 33,000		Engineer's Estimate
10.6.0	Other: _____		EACH	\$ -	\$ -		N/A
	Corrective Action Evaluation and Implementation Annual Subtotal					\$ 52,000	
	Total Post-Closure Care Annual Cost Subtotal					\$ 467,533	
11.0.0	MISCELLANEOUS						
11.1.0	Administration and Contingency				\$ 46,753		Approximately 10% of Total Post Closure Cost
	Misc. Subtotal					\$ 46,753	
	TOTAL ESTIMATED ANNUAL POST-CLOSURE CARE COST					\$ 514,287	
	ESTIMATED 2 YEAR POST-CLOSURE CARE PERIOD	2 x "Total Estimated Annual Post-Closure Care Cost",				\$ 1,028,573	
12.0.0	ANNUAL INFLATION FACTOR ADJUSTMENTS						
12.1.0	2025 Inflation Adjustment			2025	1.025	\$ 1,054,288	http://www.adeq.state.ar.us/sw/permits/financial.aspx