

Haley Griffith (adpce.ad)

Subject: RE: Green Bay Packaging Arkansas Kraft Class 3N Landfill - Cell 6 Construction Quality Assurance

From: Jonathan King <jking@promusengineering.com>

Sent: Tuesday, April 7, 2026 3:12 PM

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

Subject: RE: Green Bay Packaging Arkansas Kraft Class 3N Landfill - Cell 6 Construction Quality Assurance

CAUTION: External Email

Richard,

See my comments below in red. Please let me know if you have any additional questions or comments.

Thanks!

Jonathan B. King, P.E.

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From: Richard Bennett (adpce.ad) <Richard.Bennett@arkansas.gov>

Sent: Tuesday, April 7, 2026 2:12 PM

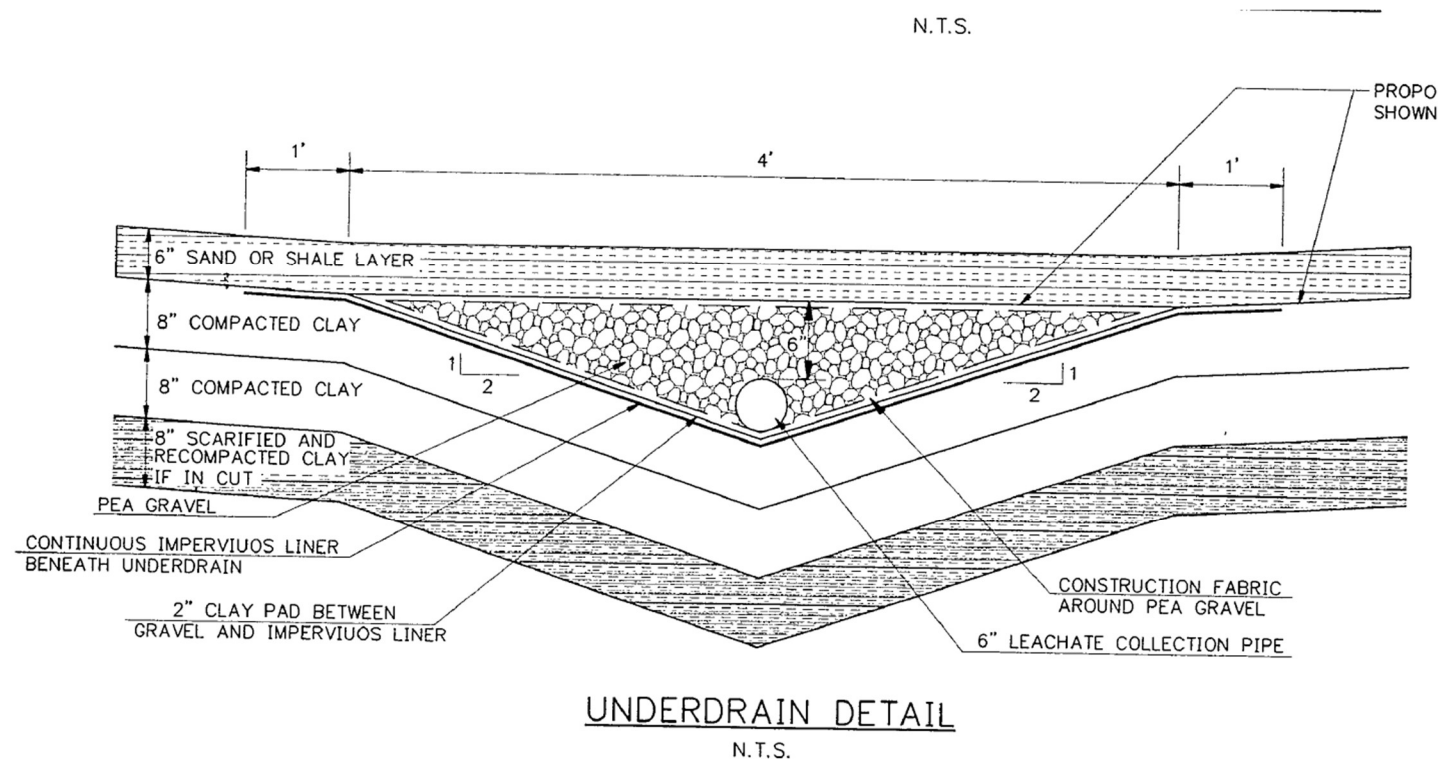
To: Jonathan King <jking@promusengineering.com>

Subject: Green Bay Packaging Arkansas Kraft Class 3N Landfill - Cell 6 Construction Quality Assurance

Here are my concerns that we talked about on the phone.

- 1) Why does one area have 2 lifts and not the usual three (see drawing 1 of 1 PDF page 148 of 148)?
 - Test Pad area was constructed in 4-6" lifts
 - The area shaded in blue had 1 lift processed in place and 2-8" lifts placed on top of that.
 - The remainder of the cell was constructed in 3-8" lifts.
- 2) Was the FA updated
 - The FA was submitted with the 2025 AEIR on 3/27/2026. The FA mechanism was mailed to the ADEQ on 3/24/2026. According to the FA, the largest area ever requiring closure is 33.0 acres. After construction of Cell 6, the facility will still be below this threshold.
- 3) No request for deviation for ASTM 7238 in CQA but used 4355.
 - ASTM 4355 for UV resistance was on the product data sheet for the geotextile. UV resistance was not conducted on the geotextile because it was not required by the CQA Plan and the material will not be exposed to long term UV.
- 4) Pre-construction Leachate gravel failed the $\leq 5\%$ since it is 8.4%
 - The leachate gravel failed pre-construction testing at the quarry, however the material was washed prior to delivery to the site and passed construction sampling once the material was delivered and prior to use.

- 5) Geotextile failed the density (it is 9.06 oz/sy and it needs to be 10 oz/sy)
- The permit drawings (DIN #28317) page 8 of 13 (see screenshot below) call for a construction fabric around the leachate collection aggregate. The installer ordered a 10 oz/sy and the mass per unit area came back at a 9.06 which exceeds the requirement of the permit drawings. Therefore, the material was approved for use.
- 6) Where are the workers' qualifications?
- The general contractor had no previous landfill bottom liner construction experience, therefore a test pad was constructed. The test pad exceeded project specifications, so the contractor was given approval to proceed with construction of the cell.
- 7) Doc ID 28317 Pdf page 3 of 13 seems to show they are shallow
- The permit drawings (DIN #28317) page 8 of 13 (see screenshot below) have a callout pointing to the top of clay liner that states "proposed bottom elevations shown on sheet 4". Comparing the as-built top of clay elevations to the permitted elevations on sheet 4 of 13, the as-built top of clay elevations appear to be at or above the permitted elevations.



Richard Bennett | Engineer, PE

Regulated Waste Operations

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