



DIVISION OF ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

September 18, 2025

Mr. Lucas Law, Environmental Manager (llaw@gbp.com)
Green Bay Packaging – Arkansas Kraft Division
338 Hwy 113, Morrilton, AR 72110

RE: NOTICE OF FINAL PERMITTING DECISION
Solid Waste Permit Number: 0284-S3N
AFIN: 15-00001

The Director has made a final permitting decision for the above-referenced solid waste permit. The Director's decision was made upon consideration of the completed application, public comments on record, if any, and any other materials provided by law or regulation applicable to the application. The Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ) has issued a final permit authorizing Green Bay Packaging - Arkansas Kraft Division for the operation and maintenance of the Class 3 Non-Commercial Landfill located at 338 Hwy 113, Morrilton, AR 72110, pursuant to the Arkansas Pollution Control and Ecology Commission (PC&EC) 8 CAR pt. 60.

The final permit, Statement of Basis for the decision, and Response to Comments, if any, are available on DEQ's website at the following web address:

https://www.adeq.state.ar.us/home/pdssql/p_permit_details_sw.aspx?AFINDash=15-00001&AFIN=1500001&PmtNbr=0284-S3N

This notice of final permitting decision is being mailed to Green Bay Packaging – Arkansas Kraft Division and those persons who submitted public comments on the record as required by the PC&EC 8 CAR pt. 11. This notice of final permitting decision including the certificate of service is part of the permitting record and is available through the website above. Green Bay Packaging – Arkansas Kraft Division and any person who submitted public comments on the record may request an adjudicatory hearing and Commission review of the final permitting decision as provided under Subpart 6 of the PC&EC 8 CAR pt. 11.

CERTIFICATE OF SERVICE

I, Haley Griffith, hereby certify that a copy of this notice of permitting decision has been mailed to Mr. Lucas Law at 338 Hwy 113, Morrilton, AR 72110 on this 18th day of September, 2025.

A handwritten signature in black ink that reads "Haley Griffith".

Signature of person mailing this notice



DIVISION OF ENVIRONMENTAL QUALITY

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

September 18, 2025

Mr. Lucas Law, Environmental Manager (llaw@gbp.com)
Green Bay Packaging – Arkansas Kraft Division
338 Hwy 113, Morrilton, AR 72110

Re: Issuance of Final Permit Decision for a Class 3 Noncommercial Landfill

Green Bay Packaging – Arkansas Kraft Division

Solid Waste Permit Number: 0284-S3N; AFIN: 15-00001

Cross Reference Document Identifiers (Doc IDs):

**0284-S3N_Revision to Minor Permit Mod for Final Cover Sequencing_20250605.pdf,
0284-S3N_Closure Sequencing Showing the Final Buildout on the Last
Phase_20241101.pdf,
0284-S3N_Minor Permit Modification Request_20240816.pdf
85705**

Dear Mr. Law:

The Division of Environmental Quality Office of Land Resources (DEQ) has reviewed the requests for permit modifications for the Green Bay Packaging – Arkansas Kraft Division, received June 14, 2025, and August 16, 2025, and revised on November 1, 2024, and June 5, 2025. This modification updates the Hazardous Waste Exclusion Plan to clarify personnel responsibilities in managing hazardous waste in accordance with facility policy. It also revises the Final Cover Sequencing plan to permit interim slope cover in areas scheduled for future filling, enabling more efficient landfill operations as waste intake continues. The decision to issue the permit is based upon the information contained in the permit application and other materials submitted by the applicant.

The permit is granted subject to the terms and conditions specified in the permit. The amount of financial assurance required is \$3,788,633 for the facility. The purpose of the financial assurance is to ensure an environmentally sound closure of the site upon conclusion of operations of the facility. Please review all terms and conditions of the permit to ensure compliance with all applicable requirements.

This authorization is given in reliance upon the statements and representations made to the DEQ, and the DEQ has no responsibility for the ultimate proper functioning of the disposal facility. DEQ also reserves the right to request additional information if deemed necessary. This approval shall not remove any liability nor hold the Green Bay Packaging – Arkansas Kraft Division permittee harmless in the event of any adverse environmental or public health conditions resulting from this authorization. The Green Bay Packaging – Arkansas Kraft Division shall be solely and fully responsible for implementing any corrective action necessary to remediate any adverse condition at the site based on this authorization.

If you have any questions regarding this correspondence, please contact Richard Bennett at (501) 682 - 0861 or Richard.Bennett@arkansas.gov.

Sincerely,

A handwritten signature in black ink that reads "Bryan Leamons". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bryan Leamons, P.E.
Deputy Director, Office of Land Resources

Enclosures: Permit
Permit Application Summary and Rationale

cc: DEQ – Hurt, Krou, Speake, and Banic
Jacob Wesson, Green Bay Packaging (jwesson@gbp.com)

**PERMIT
FOR THE CONSTRUCTION AND OPERATION OF A
SOLID WASTE DISPOSAL FACILITY
ISSUED BY
STATE OF ARKANSAS
DEPARTMENT OF ENERGY AND ENVIRONMENT
DIVISION OF ENVIRONMENTAL QUALITY
OFFICE OF LAND RESOURCES**

Class 3N Landfill

Permit Number:	0284-S3N
AFIN:	15-00001
Effective Date:	September 18, 2025
Original Issuance Date:	November 8, 1996
Permit Owner & Address:	Green Bay Packaging, Inc. Arkansas Kraft Division P.O. Box 711 Morrilton, AR 72110
Facility Name & Address:	Arkansas Kraft Mill 338 Highway 113 South Morrilton, AR 72110
Facility Location:	Section 7, Township 5 North, Range 16 West, Conway, Arkansas.
Permitted Landfill Disposal Area:	100 Acres
Property Total Area:	185 Acres
Permitted Disposal Capacity:	4,172,662 cubic yards
Financial Assurance:	Total \$3,788,633 Closure \$2,760,060 Post-Closure \$1,028,573

This permit authorizes the construction and operation of the Class 3N Landfill as set forth in the permit application submitted by Green Bay Packaging, Inc., Arkansas Kraft Division, hereinafter called “owner” or “permittee,” and received by the Division of Environmental Quality on June 14, 2024. The application was completed through a series of documents furnished by the permittee beginning on August 16, 2024.

This permit is issued pursuant to the provisions of the Arkansas Solid Waste Management Act (Arkansas Code Annotated 8-6-201 et seq.) as amended, hereinafter called the “Act”; 8 CAR pt. 60, Arkansas Solid

Waste Management Rules, as adopted by the Arkansas Pollution Control and Ecology Commission, hereinafter called Part 60; and all other applicable rules and regulations administered by the Division of Environmental Quality, hereinafter called "Division", and the following terms and conditions:

DESCRIPTION OF THIS PERMIT ACTION

This permit is for the construction, operation, and maintenance of a Class 3N solid waste landfill located in Morrilton, Conway County, Arkansas. This modification updates the Hazardous Waste Exclusion Plan to clarify personnel responsibilities in managing hazardous waste in accordance with facility policy. It also revises the Final Cover Sequencing plan to permit interim slope cover in areas scheduled for future filling, enabling more efficient landfill operations as waste intake continues.

SITE SPECIFIC CONDITIONS

1. This permit is for an approximately 100-acre waste disposal site as indicated on the approved plans. The final grades and elevations shall not be exceeded at any time or in the anticipation of settlement and consolidation of the waste mass. This permit shall expire when the authorized fill elevations have been attained and the facility is closed out in accordance with the provisions of Part 60.
 - a. The Division shall be notified in writing upon construction of each disposal unit and upon facility closure in order that it may be inspected.
 - b. Changes to or deviations from the construction and operation of the facility, as indicated on the approved facility plans indicated below, and on the approved permit application documentation, are not authorized unless approved in writing by the Division.
 - c. The approved application document is filed under Document ID 52697.
2. The total amount of financial assurance is \$3,788,633. Of this amount \$2,760,060 will be required for closure costs and \$1,028,573 will be required for post-closure costs. This amount shall be subject to annual adjustments and may be increased at the discretion of the Division based upon the estimated cost for a third party to close the largest area requiring final cover during the active life of the facility and the cost for a third party to perform post-closure care.
 - a. The instruments used to demonstrate financial assurance must be in accordance with the mechanisms set forth in 8 CAR § 60-1405(a through l) or as otherwise approved by the Division.
 - b. Operations allowed under this permit shall not commence until all financial assurance is satisfactorily filed with the Division.
 - c. A portion or all of the financial assurance may be held by the Division beyond the time of cessation of disposal operations at the site to ensure satisfactory closure and post closure care in accordance with Part 60.
3. This permit is for the disposal of solid waste generated by the Arkansas Kraft Mill at Oppelo. The authorized waste streams are sludge from sludge press, recycle rejects (scrap paper, reject paper,

wire, etc), friable asbestos material, incinerator ash and residue, solidified sludge, fly ash, green liquor dregs, slaker, grit washer, lime waste, woodyard waste, and miscellaneous trash. Additional waste items not mentioned above may be authorized by the Division for disposal at the facility on a case-by-case basis when requested by the permittee.

4. The facility is permitted for 4,172,662 cubic yards of solid waste disposal including daily and intermediate cover material.
5. The bottom liner system for any newly constructed waste cell is detailed in Document Identification Number 0284-S3N_Revision to Minor Permit Mod for Final Cover Sequencing_20250605.pdf; or in accordance with a design approved by the Director. Should the permittee desire to use any liner system other than a “composite liner” system as defined in 8 CAR § 60-424(b), an Alternative Liner Demonstration in accordance with Division written guidance on alternative liner design and demonstration shall be submitted to and approved by the Division prior to initiation of construction of the alternative liner system. The Division reserves the right to require the installation of additional groundwater monitoring wells and make other changes to the permit in the event a request to use an alternative liner design is approved.
 - a. Proper construction of the bottom clay liner of each waste cell shall be observed and certified to the Division by a Professional Engineer registered in the State of Arkansas in a Construction Certification Report in accordance with the approved Constructions Quality Assurance (CQA) Plan whenever a cell is prepared for use.
 - b. The Construction Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation, and extent of area(s) constructed for use; and test locations.
 - c. The Certification Report shall be submitted to the Division at least fourteen (14) calendar days prior to waste placement in that cell.
6. The final cover system shall be designed according to the specifications set forth under Document Identification Number 78782, which consists of a 6-inch vegetative cover and an 18-inch thick compacted clay liner ($K \leq 1.0E-7$ cm/sec).
7. The approved permit plans for the facility are as follows:
 - Sheet 1 - Cover Sheet (Document Identification Number 2559)
 - Sheet 2 - Arial Photograph (Document Identification Number 2559)
 - Sheet 3 - Overall Site Plan (Document Identification Number 2559)
 - Sheet 4 - Proposed Bottom Elevations (Document Identification Number 2559)
 - Sheet 5 - Finished Surface Elevations (Document Identification Number 2559)
 - Sheet 6 - Typical Operation Plan (Document Identification Number 2559)
 - Sheet 7 - Typical Landfill Cross Sections (Document Identification Number 2559)
 - Sheet 8 - Typical Details (Document Identification Number 2559)
 - Sheet 9 - Generalized Surface Profile (Document Identification Number 2559)
 - Sheet 10 - Location of Piezometers (Document Identification Number 2559)
 - Sheet 11 - Top of Shale Bedrock (Document Identification Number 2559)

Sheet 12 - Thickness of Clay Overburden (Document Identification Number 2559)

Sheet 13 - Potentiometric Surface Map (Document Identification Number 2559)

8. The permittee shall implement the Hazardous and Unauthorized Waste Exclusion Plan presented in Document Identification Number 85705. In addition to the implementation of the approved plan, the facility shall fully meet all requirements of 8 CAR § 60-412 regarding the exclusion of all unauthorized waste streams.
9. The permittee is exempted from implementing a routine methane monitoring program unless the Division determines that:
 - a. The nature and quantity of waste poses a significant potential for the generation of explosive gases; or
 - b. Explosive gases have been detected in concentrations exceeding the standards identified in 8 CAR § 60-514(a).
10. The permittee shall implement the requirements detailed in the Operating Plan and Narrative presented in Document Identification Numbers 79084 and 78965. In addition to the implementation of the approved Operating Plan and Narrative, the facility shall fully meet the requirements of Part 60.
11. Landfill cells shall be constructed in accordance with the approved Construction Quality Assurance (CQA) Plan and furthermore in accordance with Part 60 and permitted designs. Before commencing construction of each landfill cell, the permittee shall submit notification in accordance with 8 CAR § 60-428. Construction Quality Assurance/Quality Control (CQA/QC) criteria, procedures, testing, documentation, reporting, and certifications for construction shall be in accordance with the approved CQA plan and 8 CAR § 60-428 and 8 CAR § 60-429. An engineering certification report meeting the requirements of Part 60 shall be submitted to the Division at least fourteen (14) days prior to the planned commencement of disposal activities in any newly constructed disposal area.

All test results, certifications, acceptances, construction reports, photographs, layout drawings, record (as- built) drawings, shop drawings, construction drawings, and other documentation required by the specifications, CQA/QC plans, and/or permit conditions herein shall be retained in the facility operating record for review by authorized representatives of the Division.
12. The permittee shall implement the Closure and Post-Closure Care Plans presented in 0284-S3N_Minor Permit Modification Request_20240816.pdf. In addition to the implementation of the approved Closure and Post Closure Care Plans, the facility shall fully meet all requirements of 8 CAR § 60-1301 and 8 CAR § 60-1302. The post-closure care period for this facility shall be a minimum of two (2) years starting on the date the Division accepts closure of the facility. The length of the post-closure care period may be decreased or increased by the Director in accordance with 8 CAR § 60-1302(c)(4). Closure Certification Reports for final cover construction shall be submitted to the Division in accordance with 8 CAR § 60-1301 and in accordance with the approved Closure Plan.

GROUNDWATER MONITORING PERMIT CONDITIONS

1. A groundwater monitoring system shall be established and maintained that consists of a sufficient number of wells or sampling points installed at appropriate locations and depths in order to:
 - a. Provide groundwater quality passing the relevant point of compliance of the solid waste unit, facility, or practice as defined by 8 CAR § 60-102. The downgradient monitoring system must ensure detection of groundwater contamination in the uppermost aquifer; and
 - b. Provide background that has not been affected by any solid waste unit, facility, or practice as defined by 8 CAR § 60-102.
2. The groundwater monitoring system for this facility must always be properly maintained, sampled in accordance with the terms and conditions stipulated in this permit, and comply with the requirements found in Part 60. Once established, groundwater monitoring shall be conducted throughout the active life and post-closure care period.
3. The facility will follow an approved Sampling and Analysis Plan (SAP). The currently approved SAP is dated 2/15/2022 and contained in Document ID 82924. Changes to this approved SAP will be accomplished following the provisions of Part 60.
4. The groundwater monitoring system shall include, at a minimum, eleven (11) monitoring wells comprised of the existing monitoring wells P-1, P-2, P-4, P-5, P-6, P-7, P-8, P-11, P-12, P-13, and P-14 as shown in Drawing No. 1 of Document ID 81468. Any modification of the groundwater monitoring system will follow the provisions of Part 60.
5. No monitoring well or piezometer shall be installed, decommissioned, replaced, repaired, or otherwise altered without prior approval of the Division. Upon completion of a well installation, replacement, decommissioning, repair or alteration, a report shall be submitted to the Division within sixty (60) days of completion and a copy shall be placed in the facility operating record. Within the report, work quality and methods must be certified by the supervising professional.
6. The groundwater monitoring frequency shall be at least semi-annual during the active life of the facility and the post-closure period. For semi-annual monitoring, the monitoring events will be performed approximately six months apart. In addition, one monitoring event will be performed within the first six months of the year (January through June) and one monitoring event within the last six months of the year (July through December).
7. For new monitoring wells, quarterly sampling is required until enough data has been collected to adequately perform reliable statistical analysis per recommendations of the EPA Unified Guidance [Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance by EPA dated March 2009 (EPA-530/R-09-007)]. Quarterly monitoring events will be performed approximately three months apart. In addition, one monitoring event will be performed during each quarter, defined as: January through March, April through June, July through September, and October through December.

8. Groundwater quality background concentrations used in statistical evaluations for the site groundwater monitoring system shall not be based on data affected by any solid waste landfill unit, facility, or practice as defined in Part 60. EPA's March 2009 Unified Guidance (page 5-1) states that: "High quality background is the single most important key to a successful statistical groundwater monitoring program, especially for detection monitoring. All of the statistical tests listed in the RCRA regulations are predicated on having appropriate and representative background measurements ... The most important quality of background is that it reflects the historical conditions unaffected by the activities it is designed to be compared to. " Several sections of Part 60 address a combination of background and statistical methods either directly or indirectly. These sections include: 1201(a), 1202(a)(1), 1204(c)(3), 1205(g)(2), 523, and 524(c).
9. The sample analysis shall be performed by a third-party laboratory that is properly certified by the Division's State Environmental Laboratory Certification Program Act (Ark. Code Ann §8-2-201 et seq.) to perform the types of analyses required by Part 60 and this permit. Analytical results shall be submitted directly from the contract or independent third-party laboratory to the Division.
10. The detection monitoring parameters will include at a minimum Part 60 Appendix 1 parameters, chloride, cadmium, lead, sulfate, sulfide, total organic halides, iron, manganese total dissolved solids, sulfate, total organic carbon, pH, and specific conductance.
11. All parameter concentrations which are above the Method Detection Limit (MDL) must be reported. Any MDL or Practical Quantitation Limit (PQL) laboratory reported concentration 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. Analytical methods may be modified by the Division based upon analytical results and new laboratory techniques.
12. The permittee must select a statistical method approved by the Division for evaluating water quality monitoring results for each constituent to determine whether a statistically significant increase (or decrease in the case of pH) occurs for each ground water monitoring constituent in conformance with the requirements of 8 CAR § 60-1203(g), (h), and (i). All groundwater statistical methodologies shall be performed in a manner that complies with Part 60 and consistent with the most appropriate recommendations for specific situations per the Statistical Analysis of Groundwater Monitoring Data at RCRA Facilities, Unified Guidance by EPA dated March 2009 (EPA 530-R-09-007) or the most current, relevant EPA statistical guidance. Any statements or methodologies within the groundwater sampling and analysis plan that do not meet these criteria shall not be considered authorized by the Division.
13. Schedule of a Nature and Extent Investigation and Corrective Action if required – If one or more assessment monitoring constituents are detected at statically significant levels above the groundwater protection standard (8 CAR § 60-1205(g)), the facility shall submit a work plan (including a schedule) for characterizing the nature and extent of the release to the Division within thirty (30) calendar days of either: a) the statistical finding; or b) if an Alternate Source Demonstration (ASD) is submitted per 8 CAR § 60-1205(g)(2)(B)(i), upon written notice that the ASD was not approved by the Division. The permittee must then initiate an assessment of corrective measures for the facility in accordance with 8 CAR § 60-1206. Based upon the results of the assessment of corrective measures, the permittee must proceed with selection of a remedy in

accordance with 8 CAR § 60-1207 and then proceed with implementation of a corrective action program for the facility in accordance with 8 CAR § 60-1208.

14. For monitoring wells entering into assessment monitoring, the sampling of the full list of Appendix 2 parameters will be annually for the initial two (2) sampling events per 8 CAR § 60-1205(b). Afterwards, sampling of the full list of Appendix 2 parameters may be performed at wells in assessment monitoring according to the following schedule based on 8 CAR § 60-1205(c):
 - a. All monitoring wells which had an exceedance of the groundwater protection standard during the previous calendar year shall be sampled annually.
 - b. The remainder of wells in assessment monitoring will be sampled every three (3) years.
15. Additional monitoring parameters of concern may be added to the required sampling lists during either detection monitoring, assessment monitoring, or corrective action by the Division per pt. 60 based upon individual waste and leachate characteristics as stated in 8 CAR § 60-1204(a)(3) or to be protective of human health and the environment as stated in 8 CAR § 60-1203(c).

GENERAL CONDITIONS

1. This permit is issued in reliance upon the statements and representations made in the application, operating narrative, plans, specifications, correspondence, and other related documents. The Division bears no responsibility for the adequacy or proper functioning of the disposal facility. Nothing contained herein shall be construed as releasing the permittee from any liability from damage to persons or property due to the installation, maintenance, or operation of the disposal facility or any act of the permittee, or the permittee's employees or agents.
2. The disposal facility shall be constructed, operated, and maintained in accordance with the final plans, specifications, and operation narrative as approved by the Division and in compliance with applicable provisions of the Act, Part 60, and all other applicable rules and regulations.
3. At all times the disposal facility shall be maintained in good condition and operations shall be conducted by licensed, qualified on-site operators holding the appropriate license in accordance with 8 CAR pt. 62, Licensing of Solid Waste Management Facilities and Training and Certification Requirements for Environmental Officers.
4. This permit may be revoked or modified whenever, in the opinion of the Division, the facility is no longer in compliance with the Act, Part 60, or other applicable rules and regulations. Except where expressly authorized by the Division, this permit shall not relieve the permittee, or the permittee's employees or agents, from compliance with the provisions of the Act and Part 60.
5. The Division may issue modifications or amendments to this permit governing the design, operation, maintenance, closure or post-closure of the facility during the term of this permit. Such modifications or amendments shall be attached to this permit and shall be fully maintained and enforceable as a condition or conditions of this permit.

6. The facility shall pay the annual fee assessed in accordance with 8 CAR pt. 12, Fee Rule. The facility shall also be responsible for quarterly payments of other landfill disposal fees as required under 8 CAR pt. 61, Rules for Solid Waste Disposal Fees; Landfill Post-Closure Trust Fund; Solid Waste Management and Recycling Fund Distribution; and Recycling Grant Programs. Failure to pay fees when due may result in revocation of this permit.
7. The permittee shall maintain an Operating Record at the location indicated in the permit application, or at an alternate location approved in writing by the Division.
 - a. At a minimum, the following documents and materials shall be retained in the facility operating record for review by authorized representatives of the Division:
 - i. The approved facility operating plan, approved permit plans and specifications, CQA reports, site inspection reports, operator licenses, this disposal permit and written authorizations issued by the Division that provide modifications to the facility or its operations, all environmental monitoring or test results, and other pertinent records, certifications and correspondence as required by Part 60 or other permit conditions herein; and
 - ii. All construction test results, certifications, acceptances, construction reports, photographs, layout drawings, record (as-constructed) drawings, shop drawings, construction drawings, and other documentation required by the specifications, and CQA/QC plans, reports and documents; and
 - iii. Other documents that pertain to the operation and maintenance closure and/or post-closure of the facility, or as directed by the Division.
 - b. The permittee shall forward a copy of information from the Operating Record when requested by the Division.
8. Transactions that affect the ownership of the facility must be fully disclosed to the Division in accordance with 8 CAR § 60-307.
 - a. For purposes of evaluating whether a change in ownership occurs, ownership or control may result from a change in the equity of the permittee of five percent (5%) or more.
 - b. If applicable, the permittee shall submit to the Division annual and quarterly reports required by the Securities and Exchange Commission (SEC) that provide information regarding legal proceedings in which the permittee has been involved to determine whether any change in ownership or control of the operation of this landfill has occurred.
 - c. A permit transfer will not be required when a change in ownership or control of the facility is among the persons and/or entities previously disclosed to the Division in Section E of the Disclosure Statement or similar disclosure.

9. The permittee shall furnish the Division annual engineering inspection reports in accordance with 8 CAR § 60-423. The annual report shall address the 12-month period from January through December and shall be submitted to the Division by March 31 of the following year.
10. A survey control system shall be established and maintained at the landfill site that complies with 8 CAR § 60-426.
11. The landfill working face shall be confined to the smallest practicable area.
12. The permittee shall not engage in or allow salvage operations at the facility except with written authorization from the Division or as may be provided in the section titled Site Specific Conditions of this permit. The Division may review and approve requests for future salvage of disposed materials for recycling purposes on a case-by-case basis.
13. Disposal of bulk liquid waste in the landfill is prohibited. Liquid waste is waste that contains “free liquids” as defined by Method 9095 (Paint Filter Liquids Test) in EPA Publication No. SW-846. Reintroduction of liquids other than leachate will be reviewed and permitted under the EPA Research, Development and Demonstration permit.
14. Measures to control and prevent storm water run-on from running through or into the active disposal area shall be constructed and maintained. Grading, dikes, diversion ditches, silt fencing, silt traps, and other best management practices (BMP) for storm water control shall be provided as necessary to control/prevent off-site sediment accumulation from landfill related operations.
15. Appropriate National Pollution Discharge Elimination System (NPDES) construction/storm water permit(s) shall be obtained for storm water discharges from the landfill site and borrow sites. A Storm Water Pollution Prevention Plan (SWPPP), which outlines erosion and sediment control measures, shall be prepared and implemented in accordance with applicable NPDES requirements. A copy of the SWPPP shall be maintained on-site for reference by operating staff.
16. The permittee shall comply with the air criteria requirements of 8 CAR § 60-416. Those requirements include meeting the State Implementation Plan (SIP) pursuant to Section 110 of the Clean Air Act; prohibiting open burning of solid waste, unless authorized by the Division; and establishing fire safety procedures.
17. Litter control fences shall be provided in the active fill area for the control of blowing litter. Other litter control measures shall be implemented, if necessary, to confine litter to the smallest practicable extent and prevent litter from leaving the site.
18. Leachate screening and monitoring shall be in accordance with 8 CAR § 60-429(1). Leachate from the landfill will be sampled at a minimum of the same frequency and for the same parameters as groundwater monitoring except that turbidity is not a required parameter. Leachate sampling frequency and parameters may be adjusted by the Division as allowed by 8 CAR § 60-429(1)(2) and 8 CAR § 60-429(1)(3).

19. The permittee shall implement a hazardous waste screening and detection program at the facility in accordance with the approved operating plan and 8 CAR § 60-412. The program shall include procedures for evaluation of any questionable wastes prior to disposal to determine whether the waste complies with the Part 60 requirements for disposal in the facility.
20. The permittee must cover disposed waste with at least six inches of soil at the end of each operating day, or at more frequent intervals if necessary, to control disease vectors, fires, odors, blowing litter, and scavenging. No portion of the waste is to be left exposed at the end of the operating day. Alternative materials for daily cover, such as synthetic materials, shall only be used when specifically authorized in writing by the Division. Any alternative daily cover that is proposed by the permittee must comply with Division guidelines and include specific written operating procedures that will be implemented to control disease vectors, fires, odors, blowing litter, and scavenging. The use of synthetic material will not be authorized unless it is incorporated within operating procedures that also rely on use of at least six inches of soil cover for daily cover on some days; any proposal for daily cover based solely upon full-time use of synthetic material will not be approved.

Press sludge may be utilized as an alternative daily and intermediate cover under 8 CAR § 60-512(c) provided that the use of the sludge as a cover adequately meets the requirements of 8 CAR § 60-(a), (b), and (c).

21. The final grades and elevations shown on the approved design plans referenced herein shall not be exceeded at any time or in anticipation of settlement and consolidation of the waste mass.
 - a. Timely initiation and completion of closure of landfill cells or units shall be made in accordance with 8 CAR § 60-1301(f) and (g).
 - b. Proper construction of the final cover system shall be observed and certified in writing to the Division by a Professional Engineer registered in the State of Arkansas in a Construction Certification Report in accordance with the approved CQA Plan whenever a cell, area or phase of the landfill is closed.
 - c. The Certification Report shall include CQA/QC test results as indicated in the approved CQA Plan; drawings indicating the location, designation and extent of closed area(s); and test locations.
22. Any statements in the operational narrative, application documents, specifications, monitoring plans and/or engineering plans that conflict with and are less stringent than Part 60, permit conditions herein, or other applicable laws and rules shall not be considered authorized by the Division. The permittee shall comply with the most stringent of 1) Permit conditions contained herein; 2) Part 60 and other rules covering solid waste; and 3) State solid waste statutes.
23. This permit authorizes one (1) active disposal area at the facility per 8 CAR § 60-411(c). Multiple working faces shall not be utilized at the facility unless the permittee can provide adequate justification for more than one working face and specific authorization for such is granted in writing by the Division. It is not anticipated that such authorization will be granted except on a temporary basis for highly unusual or emergency situations.

24. The Division, its employees, agents, or any authorized person shall have the right to enter the property at any time for any reason as set out in Part 60 for the purposes of, including but not limited to taking samples, reviewing the operating record, inspecting the facility, and perform other enforcement or engineering action without interference or delay from the permittee.
25. The Division's decision to issue this permit is final for purposes of appeal as of the signature date shown below. If any provision of these conditions or the application of these conditions thereof to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of these conditions that can be given effect without the invalid provision or application. Therefore, to this end, the provisions of these conditions are declared to be severable.
26. Seeding with suitable perennial grasses and soil stabilization shall be conducted in the spring and fall on all exposed soil surfaces not currently receiving waste. Furthermore, re-vegetation shall be accomplished as soon as practicable after final elevations are attained and the area is capped. Following the establishment of cover vegetation, the vegetation shall be properly mowed as needed during the growing season to control undesirable annual weed and woody vegetation growth and to facilitate proper inspection of the cover.

Borrow sites(s) shall be reclaimed through seeding with suitable perennial grasses to control erosion and final grading to promote proper drainage, or other means acceptable to the Division.

27. The final grades/elevations as shown on the approved engineering plans shall not be adjusted in anticipation of settling and consolidation of the waste mass. The actual grades/elevation upon completion and capping of the fill shall not exceed those indicated on approved plans.
28. Diversion terraces or berms shall be constructed and maintained around active fill area(s) to divert surface run-on water around area(s). This shall be supplemented by portable pumps, if necessary, to keep run-on water from entering active fill area(s).

APPROVED BY: Division of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72218



Bryan Leamons, P.E.
Deputy Director, Office of Land Resources

September 18, 2025

Date

Statement of Basis:
Permit Application Summary and Rationale
Green Bay Packaging, Inc. Arkansas Kraft Division
Permit No. 0234-S3N; AFIN 15-00001

Permit Application Summary

This summary form consists of information submitted during the permitting process. It represents basic information from the administrative record utilized in forming recommendations from the Office of Land Resources. The entire file for the solid waste permit application specified below should be reviewed for complete details on the proposed facility.

Permit Application Summary	
Name of Applicant:	Green Bay Packaging, Inc. Arkansas Kraft Division
Type of Facility:	Class 3N landfill
Engineering Firm:	Promus Engineering
Application Dates:	June 14, 2024 and August 16, 2024
Site Location:	General: 338 Highway 113, Morrilton, AR 72110 Specific: Section 17, Township 5 North, Range 16 West, Conway County, Arkansas.
Permit Area:	Permitted Landfill Disposal Area: 100 ±Acres. Property Total Area: 185 ±Acres.
Wetlands:	The site has 2 small wetlands. One in the southeast quarter of Section 7 and a wetland in the northeast portion of Section 18 where the country road relocation which should impact 0.4 acres of wetland. The placement of fill material in 0.5 acres of wetland and to expand the fill operation was approved.
Geology:	The site lies in the folded and faulted Arkansas River Valley Physiographic Province. This area is underlain by roughly east-west trending folds composed of interbedded sandstones and shales on the Pennsylvanian-Aged Atoka Formation. The site is situated on the southern limb of a syncline underlain by the upper part of the Atoka Formation. Shales noted in previous test pit excavations at the adjacent permitted site strike roughly east-west and dip at 20 degrees to the north.
Soils:	The soils encountered on site consist of silt loam at the surface underlain by mostly clays with traces of organic material and sandstone gravel in select boring logs, on top of weathered shale encountered at depths ranging from 5-25ft bgs representing backswamp deposits from the Arkansas River.
Groundwater:	Groundwater on site is encountered between 8-23ft bgs. The water level elevations summarized in Table II of the second half 2024 GWMR indicate an east-northeast groundwater flow direction. As described in Section 4.1, the minimum average linear velocity is estimated at 8.51×10^{-8} cm/sec, while the maximum average linear velocity is estimated at 5.11×10^{-7} cm/sec.
Surface Drainage	Surface drainage from the site is generally easterly toward the Arkansas River,

Permit Application Summary	
Sequence:	which is the east boundary of the mill site.
Waste Streams:	See Site Specific Condition #3.
Total Capacity:	4,172,662 cubic yards
Disposal Rate:	260,277 cubic yards
Projected Active Life:	30 years
Bottom Liner System:	The bottom liner system for any newly constructed waste cell must consist of twenty four (24) inches of compacted clay exhibiting a maximum hydraulic conductivity of 1×10^{-7} centimeters per second (cm/s). In areas of cut, the bottom eight (8) inches may be scarified and recompact. 60 mil HDPE geomembrane liner shall be placed in the flowline of the leachate collection corridor (also referred to as “Underdrain” on the approved Permit Drawings) with a minimum 12-inch overlap outside of the trench. The compacted clay liner will be overlain by a six (6) inch thick protective cover layer consisting of either sand or shale.
Final Cover:	6-inch vegetative cover, and 18-inch thick compacted clay liner ($K \leq 1.0 \times 10^{-7}$ cm/sec).

Permit Summary and Rationale

The following information was considered during the preparation of a draft permitting decision for the proposed facility:

Permit Pre-Application dated June 13, 1980.

Permit Application dated April 25, 1969. The application was later completed through documents furnished through October 15, 1991].

Documentation for this modification was provided on June 14, 2024 and August 16, 2024.

Correspondence from the Permittee; The Arkansas Solid Waste Management Code, as Amended (Part 60); and all other applicable rules of the Division.

Condition No.	Site Specific Conditions
1.	Concerns the expiration of the permit. The permit will expire when the facility is filled to permit capacity and closed out in accordance with 8 CAR § 60-309 and the approved Closure Plan.
2.	Specifies the amount of financial assurance. (8 CAR § 60-1402 and 8 CAR § 60-1403).
3.	Concerns the type of disposal material permitted for the Class 3N landfill including special materials outlined in 8 CAR § 60-702 and 8 CAR § 60-703.
4.	Concerns the landfill permitted capacity.
5.	This permit condition establishes the approved bottom liner system configuration of the landfill in accordance with 8 CAR § 60-524(f) and 8 CAR § 60-528.
6.	This permit condition establishes the approved final cover in accordance with 8 CAR §

Condition No.	Site Specific Conditions
	60-528 and 8 CAR § 60-1301.
7.	This permit condition details the approved landfill plans for the facility. Any changes to the plans listed will require a modification to the facility permit.
8.	This permit condition identifies the approved Hazardous Waste Exclusion Plan for the facility as required by 8 CAR § 60-511.
9.	Specifies that the permittee is exempted from implementing an explosive gas monitoring plan. (8 CAR § 60-514).
10.	This permit condition establishes the approved Operating Plan and Narrative as required by 8 CAR § 60-521.
11.	This condition establishes the approved CQA Plan for the facility and requires review of construction documents prior to all construction events.
12.	This permit condition establishes the approved Closure and Post Closure Care Plan for the facility as required by 8 CAR § 60-1301 and 8 CAR § 60-1302.

Condition No.	Groundwater Monitoring Conditions
1.	Requires the permittee to utilize and maintain a groundwater monitoring system to adequately monitor potential impacts on groundwater from facility operations. A general summary of 8 CAR § 60-1202.
2.	Specifies the duration of maintenance, design, installation, and operation of the groundwater monitoring system at the facility required by 8 CAR § 60-1202(d).
3.	Requires the facility to follow an approved groundwater sampling and analysis plan that complies with 8 CAR § 60-1203(j).
4.	References the proposed well identification numbers and well locations for this facility to be used as the groundwater monitoring system required by 8 CAR § 60-1202(a). Point of compliance is defined in 8 CAR § 60-524(c).
5.	Requires Division approval and supervising professional certification for modifying facility groundwater monitoring wells or piezometers per 8 CAR § 60-1103(f). Gives schedule for submitting reports to the Division.
6.	Requires the permittee to sample at least semi-annually per 8 CAR § 60-1204(b). Specifies semi-annual monitoring intervals.
7.	Specifies quarterly monitoring intervals. Quarterly sampling during background sampling is required by 8 CAR § 60-1203(e) and quarterly sampling during assessment monitoring is required by 8 CAR § 60-1205(d)(2).
8.	Requires background concentrations used in statistical evaluations in the site groundwater monitoring reports to be data which has not been affected by a solid waste landfill unit, facility, or practice as defined by 8 CAR § 60. EPA's March 2009 Unified Guidance (page 5-1) states that: <i>"High quality background is the single most important key to a successful statistical groundwater monitoring program, especially for detection monitoring. All of the statistical tests listed in the RCRA regulations are predicated on having appropriate and representative background measurements ..."</i>

Condition No.	Groundwater Monitoring Conditions
	<i>The most important quality of background is that it reflects the historical conditions unaffected by the activities it is designed to be compared to.</i> " Several sections of Part 60 address a combination of background and statistical methods either directly or indirectly. These sections include: 1201(a), 1202(a)(1), 1204(c)(3), 1205(g)(2), 523, and 524(c).
9.	Requires sample analyses to be completed by a Division approved laboratory per the "State Environmental Laboratory Certification Program Act (Ark. Code Ann. § 8-2-201 et Seq.)". Requires direct submittal of all analytical results from the contract or independent third-party laboratory to the Division per 8 CAR § 60-1203(k).
10.	States detection monitoring parameters per 8 CAR § 60-1204(a) and (d).
11.	Requires parameter concentrations above the MDL to be reported to the Division and for the PQL and MDL reported to be the lowest concentration that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions using current laboratory standards per 8 CAR § 60-1203(h)(5). The sampling procedures and frequency must be protective of human health and the environment per 8 CAR § 60-1203(c).
12.	States all groundwater statistical methodologies will comply with 8 CAR § 60. In addition, the methodologies will be consistent with the EPA Unified Guidance or the most current relevant EPA statistical guidance publication per 8 CAR § 60-1203(g)(6) and (7). The statistical methods and techniques used in the statistical evaluation must be clearly explained and referenced as part of the groundwater monitoring report documentation and discussion required by 8 CAR § 60-1203(k).
13.	Establishes timeline for the execution of 8 CAR § 60-1205(g) following the finding of Statistically Significant Assessment Levels above the Groundwater Protection Standard. Also requires permittee to follow 8 CAR § 60-1206, § 60-1207 and § 60-1208.
14.	Discusses Appendix 2 sampling frequency if facility is in assessment monitoring 8 CAR § 60-1205(c).
15.	Additional monitoring parameters of concern may be added to the required sampling lists during either detection monitoring, assessment monitoring, or corrective action by the Division per 8 CAR § 60 based upon individual waste and leachate characteristics as stated in 8 CAR § 60-1204(a)(3) or to be protective of human health and the environment as stated in 8 CAR § 60-1203(c).

Condition No.	General Conditions
1.	States the Division has no responsibility for the proper functioning of the disposal facility and the permittee is not exempt from liability to third parties per 8 CAR § 11-101.
2.	Concerns the requirements for construction and operation of the disposal facility in accordance with the approved plans/specifications/operation narrative are in

Condition No.	General Conditions
	accordance with 8 CAR § 60-308, 8 CAR § 60-510, and 8 CAR § 60-521.
3.	Concerns requirements to maintain the disposal facility in good operating condition under licensed, qualified, on-site landfill operators is in accordance with 8 CAR § 60-510 and with 8 CAR § 42-101.
4.	Concerns the right of the Division to revoke or modify the permit in the event the facility is no longer in compliance with the Arkansas Solid Waste Management Act, 8 CAR § 60, or other applicable rules and regulations in accordance with 8 CAR § 60-308.
5.	Concerns issuance of modifications to the permit by the Division is in accordance with 8 CAR § 60-308 and 8 CAR § 60-521.
6.	Concerns payment of permit fees in accordance with 8 CAR pt. 12 and 8 CAR pt. 61.
7.	Concerns requirements for maintenance of landfill related documents in an Operating Record are in accordance with 8 CAR § 60-520.
8.	Concerns permit transfer must be disclosed to the Division in accordance with 8 CAR § 60-307.
9.	Concerns requirements for submittal of an annual engineering inspection report are in accordance with 8 CAR § 60-522.
10.	Outlines the requirements for implementation and maintenance of a survey control system at the landfill site for horizontal and vertical control of landfill construction/operation is in accordance with 8 CAR § 60-526.
11.	Outlines requirements for disposal in a single working area of the smallest practicable extent are in accordance with 8 CAR § 60-510(c).
12.	Regards salvage operations are not allowed in accordance with 8 CAR § 60-510(e).
13.	Concerns the prohibition of the disposal of bulk liquid waste in the landfill is in accordance with 8 CAR § 60-519.
14. & 15.	Concerns measures to control and prevent stormwater run through or into the active face and requirements for appropriate NPDES permit(s) and a Storm Water Pollution Prevention Plan (SWPPP) is in accordance with 8 CAR § 60-517, 8 CAR § 60-5178 and 8 CAR § 60-517, and the Clean Water Act.
16.	Concerns requirements for compliance with applicable air criteria is in accordance with 8 CAR § 60-515 and the Clean Air Act.
17.	Concerns requirements for litter control fences and other control measures for blowing litter in accordance with 8 CAR § 60-510(g).
18.	Requires leachate from the landfill to be sampled, at a minimum, at the same frequency and for the same parameters as ground water monitoring except that turbidity is not a required parameter per 8 CAR § 60-529.
19.	Concerns requirements for the implementation of a hazardous waste screening and detection program at the facility is in accordance with 8 CAR § 60-511.
20.	Concerns the application of six inches of soil at the end of each operating day or at more frequent intervals, if necessary, in accordance with 8 CAR § 60-512.
21.	Concerns requirements to fill within the final grades and elevations indicated on the approved plans, timely initiation, and completion of closure, and proper CQA monitoring, and certification are in accordance with 8 CAR § 60-510, 8 CAR § 60-

Condition No.	General Conditions
	528, and 8 CAR § 60-1301.
22.	Concerns the requirements for the permittee to comply with Part 60 or permit conditions in the event of a conflict between them and representations in the permit application documents.
23.	Concerns the permit authorizes only one (1) working face in accordance with 8 CAR § 60-510(c).
24.	Concerns the right of Division employees to enter the permittee's property to inspect the facility at any time without interference or delay is in accordance with 8 CAR § 60-1501(a).
25.	Concerns providing notice for the purpose of appeal of the final permit in accordance with 8 CAR § 60-306 and in accordance with 8 CAR § 11-101. Provisions regarding severability are in accordance with 8 CAR § 60-1601.
26.	Concerns the requirements for the permittee to comply with 8 CAR § 60-510(i) for a final vegetative cover.
27.	Concerns the requirements for the final cover elevation to comply with 8 CAR § 60-309.
28.	Concerns the requirements for the permittee to comply with 8 CAR § 60-510(h) to prevent run-on to the active area(s).