

Haley Griffith (adpce.ad)

From: Vaughn, Kiefer <KVaughn@pmico.com>
Sent: Tuesday, June 16, 2026 8:59 AM
To: EE GW Reports; Jordan Anderson (adpce.ad)
Cc: Jacob Wesson; Wilson, Victoria; Ford, Doug
Subject: Green Bay Packaging - First 2026 Notification of Statistically Significant Increases and ASD - Permit 284-S3N
Attachments: 284-S3N - 1st Half 2026 ASD Arkansas Kraft 6-16-26.pdf

CAUTION: External Email

Please find attached 1st Half 2026 Notification of Statistically Significant Increases and ASD for the above referenced facility.

Kiefer Vaughn, P.G., MS
Senior Project Manager | Environmental

Pollution Management, Inc., A Terracon Company

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June 16, 2026

Mr. Jordan Anderson, P.G.
Groundwater Branch
ARKANSAS ENERGY AND ENVIRONMENT
DIVISION OF ENVIRONMENTAL QUALITY
5301 Northshore Drive
North Little Rock, AR 72118-5328

VIA EMAIL: EE.gwreports@arkansas.gov
and jordan.anderson@arkansas.gov

RE: First Half 2026 Notification of Statistically Significant Increases
and Alternative Source Demonstration
Green Bay Packaging
Arkansas Kraft Class 3N Landfill
Solid Waste Permit 284-S3N

Dear Mr. Anderson:

Pollution Management Inc. (PMI), on behalf of the Green Bay Packaging—Arkansas Kraft Class 3N Landfill—and as required by Regulation No. 22, §22.1204(c)(1), is presenting you with this letter as notification of Statistically Significant Increases (SSIs) that occurred during the First Half 2026 Groundwater Monitoring Event conducted on April 14, 2026. The results of the statistical analysis identified five (5) constituents, chloride at P-4 and P-14, sulfate at P-4 and P-8, and TDS at P-4 as SSIs during the First Half 2026 monitoring event.

The following are Alternative Source Demonstrations (ASD) for this event for these SSIs in accordance with Regulation No. 22, §22.1204(c)(3):

- P-4 is upgradient of the landfill; therefore the SSIs for sulfate, chloride, TDS concentrations are most likely attributable to natural variability.
- Interwell prediction intervals were performed for chloride at P-14, and for sulfate at P-8, to compare upgradient and downgradient wells. No exceedances of the interwell prediction intervals were identified, suggesting that the SSIs at these downgradient wells are likely attributable to natural variability.

Sincerely,
Pollution Management, Inc., A Terracon Company

A handwritten signature in blue ink, appearing to read "KAV", with a long horizontal flourish extending to the right.

Kiefer A. Vaughn, P.G.
Project Manager

KAV

cc: Jacob Wesson, w/encl.

KT267038

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