



ALABAMA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

SOLID WASTE DISPOSAL FACILITY PERMIT

PERMITTEE: Georgia-Pacific Consumer Operations LLC

FACILITY NAME: Georgia-Pacific Naheola Landfill #2

FACILITY LOCATION: Section 36, Township 15 North, Range 1 West, and in Choctaw County, Alabama. The total permitted area is approximately 182.51 acres with 48.5 acres approved for disposal.

PERMIT NUMBER: 12-04

PERMIT TYPE: Industrial Landfill

WASTE APPROVED FOR DISPOSAL: Non-hazardous industrial waste including but not limited to: wood waste (bark, wood chips, waste wood), recausticizing waste (lime mud, slaker grit, green liquor dregs, powder lime), pulp mill waste (knots, pulp), general trash, construction debris (concrete, lumber, metal), non-coal boiler ash, wastewater treatment sludge and special waste as approved by the Department.

APPROVED WASTE VOLUME: Maximum Average Daily Volume of waste is 8000 cubic yards per day

APPROVED SERVICE AREA: Georgia-Pacific Consumer Operations LLC Naheola pulp and paper mill located near Pennington, Alabama.

In accordance with and subject to the provisions of the Alabama Solid Wastes and Recyclable Materials Management Act, as amended, Code of Alabama 1975, §§ 22-27-1 to 22-27-27 ("SWRMMA"), the Alabama Environmental Management Act, as amended, Code of Alabama, 1975, §§ 22-22A-1 to 22-22A-15, and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to dispose of the above-described solid wastes at the above-described facility location.

ISSUANCE DATE: ????????????????

EFFECTIVE DATE: ????????????????

EXPIRATION DATE: ????????????????

**ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
SOLID WASTE PERMIT**

Permittee: Georgia-Pacific Consumer Operations LLC
7530 Highway 114
Pennington, Alabama 36916

Landfill Name: Georgia-Pacific Naheola Landfill #2

Landfill Location: Section 36, Township 15 North, Range 1 West, and in Choctaw County, Alabama

Permit Number: 12-04

Landfill Type: Industrial Landfill

Pursuant to the Alabama Solid Wastes & Recyclable Materials Management Act, Code of Alabama 1975, §§22-27-1, *et seq.*, as amended, and attendant regulations promulgated thereunder by the Alabama Department of Environmental Management (ADEM), this permit is issued to Georgia-Pacific Consumer Operations LLC (hereinafter called the Permittee), to operate a solid waste disposal facility, known as the Georgia-Pacific Naheola Landfill #2.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions set forth herein (including those in any attachments), and the applicable regulations contained in Chapters 335-13-1 through 335-13-16 of the ADEM Administrative Code (hereinafter referred to as the "ADEM Admin. Code"). Rules cited are set forth in this document for the purpose of Permittee reference. Any Rule that is cited incorrectly in this document does not constitute grounds for noncompliance on the part of the Permittee. Applicable ADEM Administrative Codes are those that are in effect on the date of issuance of this permit or any revisions approved after permit issuance.

This permit is based on the information submitted to the Department on June 23, 2020 for permit renewal, and known as the Permit Application, and as amended (hereby incorporated by reference and hereinafter referred to as the Application). Any inaccuracies found in this information could lead to the termination or modification of this permit and potential enforcement action. The Permittee must inform the Department of any deviation from or changes in the information in the Application that would affect the Permittee's ability to comply with the applicable ADEM Admin. Code or permit conditions.

This permit is effective as of ??????????????, and shall remain in effect until ??????????????, unless suspended or revoked.

Alabama Department of Environmental Management

Date Signed

SECTION I. STANDARD CONDITIONS

A. Effect of Permit

The Permittee is allowed to dispose of nonhazardous solid waste in accordance with the conditions of this permit and ADEM Admin. Code Div. 13. Issuance of this permit does not convey property rights of any sort or any exclusive privilege, nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations. Except for actions brought under Code of Alabama 1975, Section 22-27-1, *et seq.*, as amended, compliance with the conditions of this permit shall be deemed to be compliance with applicable requirements in effect as of the date of issuance of this permit and any future revisions.

B. Permit Actions

This permit may be suspended, revoked or modified for cause. The filing of a request for a permit modification or the notification of planned changes or anticipated noncompliance on the part of the Permittee, and the suspension or revocation does not stay the applicability or enforceability of any permit condition.

C. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

D. Definitions

For the purpose of this permit, terms used herein shall have the same meaning as those in ADEM Admin. Code Division 13, unless this permit specifically provides otherwise; where terms are not otherwise defined, the meaning associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

1. "EPA" for purposes of this permit means the United States Environmental Protection Agency.
2. "Permit Application" for the purposes of this permit, means all permit application forms, design plans, operational plans, closure plans, technical data, reports, specifications, plats, geological and hydrological reports, and other materials which are submitted to the Department in pursuit of a solid waste disposal permit.

E. Duties and Requirements

1. Duty to Comply

The Permittee must comply with all conditions of this permit except to the extent and for the duration such noncompliance is authorized by a variance granted by the Department. Any permit noncompliance, other than noncompliance authorized by a variance, constitutes a violation of Code of Alabama 1975, Section 22-27-1 *et seq.*, as amended, and is grounds for enforcement action, permit suspension, revocation, modification, and/or denial of a permit renewal application.

2. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must apply for and obtain a new permit. The renewal application must be submitted to the Department at least 180 days before this permit expires.

3. Permit Expiration

This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application as required by Section I.,E.,2., and, through no fault of the Permittee, the Department has not made a final decision regarding the renewal application.

4. Need to Halt or Reduce Activity Not A Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit.

5. Duty to Mitigate

In the event of noncompliance with this permit, the Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out such measures as are reasonable to prevent significant adverse impacts on human health or the environment.

6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of control (and related appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this permit.

7. Duty to Provide Information

If requested, the Permittee shall furnish to ADEM, within a reasonable time, any information that ADEM may reasonably need to determine whether cause exists for denying, suspending, revoking, or modifying this permit, or to determine compliance with this permit. If requested, the Permittee shall also furnish the Department with copies of records kept as a requirement of this permit.

8. Inspection and Entry

Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the employees of the Department or their authorized representative to:

- a. Enter at reasonable times the Permittee's premises where the regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit.
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit.
- d. Sample or monitor, at reasonable times, any substances or parameters at any location for the purposes of assuring permit compliance or as otherwise authorized by Code of Alabama 1975, Section 22-27-1 et seq.

9. Monitoring, Corrective Actions, and Records

- a. Samples and measurements taken for the purpose of monitoring or corrective action shall be representative of the monitored activity. The methods used to obtain representative samples to be analyzed must be the appropriate method from Chapter 335-13-4 or the methods as specified in the Application attached hereto and incorporated by reference. Laboratory methods must be those specified in Standard Methods for the Examination of Water and Wastewater (American Public Health Association, latest edition), Methods for Chemical Analysis of Water and Wastes

(EPA-600/4-79-020), Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA Publication SW-846, latest edition), other appropriate EPA methods, or as specified in the Application. All field tests must be conducted using approved EPA test kits and procedures.

- b. The Permittee shall retain records, at the location specified in Section I.,I., of all monitoring, or corrective action information, including all calibration and maintenance records, copies of all reports and records required by this permit, and records of all data used to complete the application for this permit for a period of at least three years from the date of the sample, measurement, report or record or for periods elsewhere specified in this permit. These periods may be extended by the request of the Department at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- c. Records of monitoring and corrective action information shall include.
 - i. The exact place, date, and time of sampling or measurement.
 - ii. The individual(s) and company who performed the sampling or measurements.
 - iii. The date(s) analyses were performed.
 - iv. The individual(s) and company who performed the analyses.
 - v. The analytical techniques or methods used.
 - vi. The results of such analyses.
- d. The Permittee shall submit all monitoring and corrective action results at the interval specified elsewhere in this permit.

10. Reporting Planned Changes

The Permittee shall notify the Department, in the form of a request for permit modification, at least 90 days prior to any change in the permitted service area, increase in the waste received, or change in the design or operating procedure as described in this permit, including any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

11. Transfer of Permit

This permit may be transferred to a new owner or operator. All requests for transfer of permits shall be in writing and shall be submitted on forms provided by the Department. Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of this permit.

12. Certification of Construction

The Permittee may not commence disposal of waste in any new cell or phase until the Permittee has submitted to the Department, by certified mail or hand delivery, a letter signed by both the Permittee and a professional engineer stating that the facility has been constructed in compliance with the permit. The Department must inspect the constructed cells or phases before the owner or operator can commence waste disposal unless the Permittee is notified that the Department will waive the inspection.

13. Compliance Schedules

Reports of compliance or noncompliance with or any progress reports on interim and final requirements contained in any compliance schedule required and approved by the Department shall be submitted no later than 14 days following each schedule date.

14. Other Noncompliance

The Permittee shall report all instances of noncompliance with the permit at the time monitoring reports are submitted.

15. Other Information

If the Permittee becomes aware that information required by the Application was not submitted or was incorrect in the Application or in any report to the Department, the Permittee shall promptly submit such facts or information. In addition, upon request, the Permittee shall furnish to the Department, within a reasonable time, information related to compliance with the permit.

F. Design and Operation of Facility

The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or any unplanned sudden or nonsudden release of contaminants to air, soil, groundwater, or surface water, which could threaten human health or the environment.

G. Inspection Requirements

1. The Permittee shall comply with all requirements of ADEM Admin. Code Division 13.
2. The Permittee shall conduct random inspections of incoming loads.
3. Records of all inspections shall be included in the operating record.

H. Recordkeeping and Reporting

1. The Permittee shall maintain a written operating record at the location specified in Section I.,I. The operating record shall include:
 - a. Documentation of inspection and maintenance activities.
 - b. Daily Volume reports.
 - c. Personnel training documents and records.
 - d. Solid/Hazardous Waste Determination Forms for Industrial Wastes, and the associated Department disposal approval correspondence for industrial waste and special waste.
 - e. Groundwater monitoring records if required.
 - f. Explosive gas monitoring records if required.
 - g. Surface water and leachate monitoring records if required. Monitoring is subject to applicable conditions of Section VI. of the permit.
 - h. Copies of this Permit and the Application.

- i. Copies of all variances granted by the Department, including copies of all approvals of special operating conditions.
2. Quarterly Volume Report

Beginning with the effective date of this permit, the Permittee shall submit, within thirty (30) days after the end of each calendar quarter, a report summarizing the daily waste receipts for the previous (just ended) quarter. Copies of the quarterly reports shall be maintained in the operating record.

3. Monitoring and Corrective Action Reports

The Permittee shall submit reports on all monitoring and corrective actions conducted pursuant to the requirements of this permit, including, but not limited to, groundwater and explosive gas. The groundwater monitoring shall be conducted in March and September of each year, or as directed by the Department, and the reports shall be submitted at least semi-annually, or as directed by the Department. The reports should contain all monitoring results and conclusions from samples and measurements conducted during the sampling period. The explosive gas monitoring should be conducted on an annual basis and the reports should be submitted within 30 days of the monitoring event. The reports should contain all monitoring results and conclusions from samples and measurements conducted during the sampling period and placed in the operating record within 30 days of the monitoring event.

4. Availability, Retention, and Disposition of Records

- a. All records, including plans, required under this permit or Division 13 must be furnished upon request, and made available at reasonable times for inspection by any officer, employee, or representative of the Department.
- b. All records, including plans, required under this permit or Division 13 shall be retained by the Permittee for a period of at least three years. The retention period for all records is extended automatically during the course of any unresolved enforcement action regarding the facility, or as requested by the Department.
- c. A copy of records of waste disposal locations and quantities must be submitted to the Department and local land authority upon closure of the facility.

I. Documents to be Maintained by the Permittee

The Permittee shall maintain, at the Georgia-Pacific Naheola Landfill #2 office, the following documents and amendments, revisions and modifications to these documents until an engineer certifies closure of the permitted landfill.

1. Operating record.
2. Closure Plan.

J. Mailing Location

All reports, notifications, or other submissions which are required by this permit should be sent via signed mail (i.e. certified mail, express mail delivery service, etc.) or hand delivered to:

Mailing Address
Chief, Solid Waste Branch
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, AL 36130-1463

Physical Address
Chief, Solid Waste Branch
Alabama Department of Environmental Management
1400 Coliseum Blvd.
Montgomery, Alabama 36110-2400

K. Signatory Requirement

All applications, reports or information required by this permit, or otherwise submitted to the Department, shall be signed and certified by the owner as follows:

1. If an individual, by the applicant.
2. If a city, county, or other municipality or governmental entity, by the ranking elected official, or by a duly authorized representative of that person.
3. If a corporation, organization, or other legal entity, by a principal executive officer, of at least the level of Vice President, or by a duly authorized representative of that person.

L. Confidential Information

The Permittee may claim information submitted as confidential if the information is protected under Code of Alabama 1975, §§ 22-39-18, as amended.

M. State Laws and Regulations

Nothing in this permit shall be construed to preclude the initiation of any legal action or to relieve the Permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation.

SECTION II. GENERAL OPERATING CONDITIONS

A. Operation of Facility

The Permittee shall operate and maintain the disposal facility consistent with the Application, this permit, and ADEM Admin. Code Division 13.

B. Open Burning

The Permittee shall not allow open burning without prior written approval from the Department and other appropriate agencies. A burn request should be submitted in writing to the Department outlining why that burn request should be granted. This request should include, but not be limited to, specifically what areas will be utilized, types of waste to be burned, the projected starting and completion dates for the project, and the projected days and hours of operation. The approval, if granted, shall be included in the operating record.

C. Prevention of Unauthorized Disposal

The Permittee shall follow the approved procedures for the detecting and preventing the disposal of free liquids, regulated hazardous waste, PCB's, and medical waste at the facility.

D. Unauthorized Discharge

The Permittee shall operate the disposal facility in such a manner that there will be no water pollution or unauthorized discharge. Any discharge from the disposal facility or practice thereof may require a National Pollutant Discharge Elimination System permit under the Alabama Water Pollution Control Act.

E. Industrial Waste Disposal

The Permittee shall dispose of industrial waste as required by ADEM Admin. Code 335-13-4-.21(1)(c), and as specified in the Application.

F. Boundary Markers

The Permittee shall ensure that the facility is identified with a sufficient number of permanent boundary markers that are at least visible from one marker to the next.

SECTION III. SPECIFIC REQUIREMENTS FOR INDUSTRIAL WASTE LANDFILLS

A. Waste Identification and Management

1. Subject to the terms of this permit, the Permittee may accept for disposal the nonhazardous solid wastes listed in III.B. Disposal of any other wastes is prohibited, except waste granted a temporary or one time waiver by the Director.
2. The total permitted facility for the Georgia-Pacific Naheola Landfill #2 is approximately 182.51 acres with approximately 48.5 acres approved for disposal.
3. The maximum average daily volume of waste disposed at the facility shall not exceed 8000 cubic yards per day. Should the average daily volume exceed this value by 20% or 100 tons/day, whichever is less, the permittee shall be required to modify the permit in accordance with Rule 335-13-5-.06(2)(a)5. An increase in maximum average daily volume shall not be approved by ADEM unless the permittee has received local approval for the increased maximum average daily volume. The average daily volume shall be computed as specified by Rule 335-13-5-.06(2)(a)5.(i).

B. Waste Streams

The Permittee may accept for disposal non-hazardous industrial waste including but not limited to: wood waste (bark, wood chips, waste wood), recausticizing waste (lime mud, slaker grit, green liquor dregs, powder lime), pulp mill waste (knots, pulp), general trash, construction debris (concrete, lumber, metal), non-coal boiler ash, wastewater treatment sludge and special waste as approved by the Department.

C. Service Area

The Permittee is allowed to receive for disposal waste from Georgia-Pacific Consumer Operations LLC Naheola pulp and paper mill located near Pennington, Alabama.

D. Waste Placement, Compaction, and Cover

All waste shall be confined to an area as small as possible and placed onto an appropriate slope not to exceed 3 to 1. All waste shall be spread in layers five feet or less in thickness and compacted with a bulldozer or equivalent equipment prior to placing additional layers of waste or placing cover. A minimum of six inches of compacted earth or soil-like waste material (wastewater treatment sludge, green liquor dregs, ash, lime, bark, wood chips, sawdust) or other alternative cover material approved by the Department shall be added at the conclusion of each week's of operation.(see Section VIII. 1 and VIII. 2.)

E. Liner Requirements

The Permittee shall be required to install a composite liner system at this time. The composite liner shall consist of a two foot layer of compacted soil with a permeability of 1×10^{-7} cm/sec overlain with 60 mil textured HDPE. The drainage layer shall consist of twelve inches of sand or ash with a permeability of 1×10^{-3} cm/sec. The base of the liner system shall be a minimum of five (5) feet above the highest measurement of the groundwater table.

F. Security

The Permittee shall provide artificial and/or natural barriers, which prevent entry of unauthorized vehicular traffic to the facility.

G. All Weather Access Roads

The Permittee shall provide an all-weather access road to the dumping face that is wide enough to allow passage of collection vehicles.

H. Adverse Weather Disposal

The Permittee shall provide for disposal activities in adverse weather conditions.

I. Personnel

The Permittee shall maintain adequate personnel to ensure continued and smooth operation of the facility.

J. Environmental Monitoring and Treatment Structures

The Permittee shall provide protection and proper maintenance of environmental monitoring and treatment structures.

K. Vector Control

The Permittee shall provide for vector control as required by ADEM Admin. Code Division 13.

L. Bulk or Noncontainerized Liquid Waste

The Permittee shall not dispose of bulk or noncontainerized liquid waste, or containers capable of holding liquids, unless the conditions of Rule 335-13-4-.23(1)(j) are met.

M. Empty Containers

Empty containers larger than 10 gallons in size must be rendered unsuitable for holding liquids prior to disposal in the landfill unless otherwise approved by the Department.

N. Other Requirements

The Department may enhance or reduce any requirements for operating and maintaining the landfill as deemed necessary by the Land Division.

O. Other Permits

The Permittee shall operate the landfill according to this and any other applicable permits.

P. Scavenging and Salvaging Operations

The Permittee shall prevent scavenging and salvaging operations, except as part of a controlled recycling effort. Any recycling operation must be in accordance with plans submitted and approved by ADEM. The Permittee is permitted to staging, recover and recycle some of the lime by-product materials as part of beneficial re-use of waste materials in such a manner that the material is required to be staged on in-active portion of the proposed landfill cell # 1 and removed from a level surface at the top of the staging mound, with a front-end loader placing the material into dump trucks (see Section VIII. 3.).

Q. Signs

If the landfill is available to the public or commercial haulers, the Permittee shall provide a sign outlining instructions for use of the site. The sign shall be posted and have the information required by Rule 335-13-4-.23(1)(f).

R. Litter Control

The Permittee shall control litter.

S. Fire Control

The Permittee shall provide fire control measures.

SECTION IV. GROUNDWATER MONITORING REQUIREMENTS

A. The Permittee shall install and/or maintain a groundwater monitoring system, as specified below.

1. The permittee shall maintain the groundwater monitoring wells and piezometers identified in Table IV.1. at the locations specified in the Application, and any other groundwater monitoring wells which are added (Section IV.,A.,3.) during the active life and the post closure care period.
2. The Permittee shall maintain groundwater monitoring well MW-212A, MW-211A, MW-211B and MW-209A as the background groundwater monitoring wells for the entire facility.
3. The Permittee shall install and maintain additional groundwater monitoring wells as necessary to assess changes in the rate and extent of any plume of contamination or as otherwise deemed necessary to maintain compliance with the ADEM Admin. Code.
4. Prior to installing any additional groundwater monitoring wells, the Permittee shall submit a report to the Department with a permit modification request specifying the design, location and installation of any additional monitoring wells. This report shall be submitted within ninety (90) days prior to the installation which, at a minimum, shall include.
 - a. Well construction techniques including proposed casing depths, proposed total depth, and proposed screened interval of well(s);
 - b. Well development method(s);
 - c. A complete analysis of well construction materials;
 - d. A schedule of implementation for construction; and
 - e. Provisions for determining the lithologic characteristics, hydraulic conductivity and grain-size distribution for the applicable aquifer unit(s) at the location of the new well(s).

B. Groundwater Monitoring Requirements

1. The Permittee shall determine the groundwater surface elevation at each monitoring well and piezometer identified in Table IV.1. each time the well or piezometer is sampled and at least annually throughout the active life and post-closure care period.
2. The Permittee shall determine the groundwater flow rate and direction in the first zone of saturation at least semi- annually or each time groundwater is sampled and submit as required by ADEM Admin. Code Division 13.
3. Prior to the initial receipt of waste at the facility, the Permittee shall sample, and analyze for the parameters listed in Appendix I of Rule 335-13-4-.27, and/or any other parameters specified by the Department in Table IV. 2., all monitoring wells identified in Section IV.,A.,2. to establish background water quality and/or as directed by Rule 335-13-4-.27(2)(j) and 335-13-4-.27(2)(a)(1). The records and results of this sampling and analysis activity shall be submitted to the Department, within sixty (60) days of the date of sampling.
4. The Permittee shall sample, and analyze all monitoring wells identified in Table IV.1 for the parameters listed in Appendix I of Rule 335-13-4-.27(3), and/or any other parameters specified by the Department in Table IV.3, on a semi- annual basis throughout the active life of the facility and the
5. post-closure care period in accordance with Rule 335-13-4-.27(3). Sampling shall be conducted during March and September of each year, beginning with the effective date of this permit. The records and results of this sampling and analysis activity shall be submitted to the Department, within ninety (90) days of the date of sampling.
6. In addition to the requirements of Section IV., B.,1., B.,2., B.,3. and B.,4., the Permittee shall record water levels, mean sea level elevation measuring point, depth to water, and the results of field tests for pH and specific conductance at the time of sampling for each well.

C. Sampling and Analysis Procedures

The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Section IV.,A. to provide a reliable indication of the quality of the groundwater.

1. Samples shall be collected, preserved, and shipped (when shipped off-site for analysis) in accordance with the procedures specified in the Application. Monitoring wells shall be bailed or pumped to remove at least four times the well volume of water. Slow recharge wells shall be bailed until dry. Wells shall be allowed to recharge prior to sampling.
2. Samples shall be analyzed according to the procedures specified of the Application, Standard Methods for the Examination of Water and Wastewater (American Public Health Association, latest edition), Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020), Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA Publication SW-846, latest edition), or other appropriate methods approved by this Department. All field tests must be conducted using approved EPA test kits and procedures.
3. Samples shall be tracked and controlled using the chain-of-custody and QA/QC procedures specified in the Application.

D. Recordkeeping and Reporting Requirements

1. Recording of Results

For each sample and/or measurement taken pursuant to the requirements of this permit, the Permittee shall record the information required by Section I.,E.,9.,c.

2. Recordkeeping

Records and results of all groundwater monitoring, sampling, and analysis activities conducted pursuant to the requirements of this permit shall be included in the operating record required by Section I.,I.,1.

E. Permit Modification

If at any time the Permittee or the Department determines that the groundwater monitoring system no longer satisfies the requirements of 335-13-4-.14 or Section IV.,A. of this permit, the Permittee must, within 90 days, submit an application for a permit modification to make any necessary and/or appropriate changes to the system.

TABLE IV.1.
GROUNDWATER MONITORING WELLS

Monitoring Well Number	Top of Casing (feet msl)	Part Monitored
UPGRADIENT/BACKGROUND MONITORING WELLS		
MW-212A	To be installed	Cells 1 and 2
MW-211A	To be installed	Cells 3 and 4
MW-211B	To be installed	Cells 3 and 4
MW-209A	To be installed	Cells 5 and 6
DOWNGRADIENT MONITORING WELLS		
MW-208A	92.69	Cells 1 and 2
MW-213A	To be installed	Cells 1 and 2
MW-213B	To be installed	Cells 1 and 2
MW-210A	95.20	Cells 3 and 4
MW-210B	To be installed	Cells 3 and 4
MW-206A	96.86	Cells 5 and 6
B-101A	110.50	Cells 5 and 6
B-101B	110.16	Cells 5 and 6

TABLE IV.2.
BACKGROUND AND SEMI-ANNUAL GROUNDWATER MONITORING PARAMETERS

The parameters in this Table are those listed in Appendix I of Chapter 335-13-4.

TABLE IV.3.
SEMI-ANNUAL GROUNDWATER MONITORING PARAMETERS

NOTE: The parameters to be monitored for in this Table are those listed in Appendix I of Chapter 335-13-4, and/or any other waste stream specific parameters.

SECTION V. GAS MONITORING REQUIREMENTS

The permittee must install and maintain an explosive gas monitoring system in accordance with ADEM Administrative Code, Division 13.

SECTION VI. SURFACE WATER MANAGEMENT REQUIREMENTS

The permittee shall construct and maintain run-on and run-off control structures. Any discharges from drainage control structures shall be permitted through a discharge permit issued by the ADEM Water Division.

SECTION VII. CLOSURE AND POST-CLOSURE REQUIREMENTS

The Permittee shall close the landfill and perform post-closure care of the landfill in accordance with Division 13.

A. Final Cover

The final cover system shall comply with ADEM Admin. Code Division 13. and should consist of eighteen inches layer of compacted soil with a permeability of 1×10^{-5} cm/sec overlain with 40 mil textured HDPE, six inch of top soil and vegetative cover .

B. Vegetative Cover

The Permittee shall establish a vegetative or other appropriate cover within 90 days after completion of final grading requirements in the Application. Preparation of a vegetative cover shall include, but not be limited to, the placement of seed, fertilizer, mulch, and water.

C. Notice of Intent

The Permittee shall place in the operating record and notify the Department of their intent to close the landfill prior to beginning closure.

D. Completion of Closure Activities

The Permittee must complete closure activities of each landfill unit in accordance with the Closure Plan within 180 days of the last known receipt of waste.

E. Certification of Closure

Following closure of each unit, the Permittee must submit to the Department a certification, signed by an engineer, verifying the closure has been completed according to the Closure Plan.

F. Post-Closure Care Period

Post-closure care activities shall be conducted after closure of each unit throughout the life of this permit and continuing for a period of thirty (30) years following closure of the facility. The Department may shorten or extend the post-closure care period applicable to the solid waste disposal facility. The Permittee shall reapply in order to fulfill the post-closure care requirements of this permit.

G. Post-Closure Maintenance

The Permittee shall provide post closure maintenance of the facility to include regularly scheduled inspections. This shall include maintenance of the cover, vegetation, monitoring devices and pollution control equipment and correction of other deficiencies that may be observed by ADEM. Monitoring requirements shall continue throughout the post closure period as determined by the Department unless all waste is removed and no unpermitted discharge to waters of the State has occurred.

H. Post-Closure Use of Property

The Permittee shall ensure that post closure use of the property never be allowed to disturb the integrity of the final cover, liner, or any other component of the containment system. This shall preclude the growing of deep-rooted vegetation on the closed area.

I. Certification of Post-Closure

Following post-closure of each unit, the Permittee must submit to the Department a certification, signed by an engineer, verifying the post-closure has been completed according to the Post-Closure Plan.

J. Notice in Deed to Property

The Permittee shall record a notation onto the land deed containing the property utilized for disposal within 90 days after permit expiration, revocation or when closure requirements are achieved as determined by the Department as stated in the Application. This notation shall state that the land has been used as a solid waste disposal facility, the name of the Permittee, type of disposal activity, location of the disposal facility and beginning and closure dates of the disposal activity.

K. Recording Instrument

The Permittee shall submit a certified copy of the recording instrument to the Department within 120 days after permit expiration, revocation, or as directed by the Department as described in the Application.

L. Removal of Waste

If the Permittee, or any other person(s), wishes to remove waste, waste residues, or any liner or contaminated soils, the owner must request and receive prior approval from the Department.

SECTION VIII. VARIANCES AND SPECIAL CONDITIONS

The following are the approved variances granted for the Georgia-Pacific Naheola Landfill #2.

1. The Permittee is granted a variance from Rule 335-13-4-.23(1)(c) which requires working slopes not to exceed 4 to 1 (25%). The Permittee is allowed slopes on the working face not to exceed 3:1 (33%). (See Section III. D.).
2. The Permittee is granted a variance from Rule 335-13-4-.23(1)(b) which requires compaction in lifts no greater than two feet (See Section III.D.).
3. The Permittee is granted a variance in accordance Rule 335-13-4-.22(2)(a) to allow staging and removal of by-product lime in the landfill (See Section III.P.).
4. Upon construction of the landfill, the Permittee shall submit to the Department an updated Groundwater Monitoring Plan.

Any variance granted by the Department may be terminated by the Department whenever the Department finds, after notice and opportunity for hearing, that the petitioner is in violation of any requirement, condition, schedule, limitation or any other provision of the variance, or that operation under the variance does not meet the minimum requirements established by state and federal laws and regulations or is unreasonably threatening the public health.

APPLICATION

Received : 6/23/20



Georgia-Pacific
Consumer Operations LLC

7530 Highway 114
Naheola Mill
Pennington, Alabama 36916
(205)459-1374
(205)459-1458 fax
Deborah.Coduto@gapac.com

Deborah Coduto
Vice President, Manufacturing

June 19, 2020

Mr. Blake Holden
Solids Waste Branch
Alabama Department of Environmental Management
1400 Coliseum Blvd.
Montgomery, AL 36130

RE: Landfill Permit 12-02 and 12-04 Renewals

Dear Mr. Holden,

Georgia-Pacific Consumer Operations LLC (GP) is submitting this supplemental application package to support our renewal application submitted May 19, 2020 for industrial landfill permits 12-02 (Landfill #1) and 12-04 (Landfill #2)

The following variances are requested to be continued for Landfill Permit 12-02 (Landfill #1):

- Variance from Rule 335-13.4-.23(1)(b) requiring a 100-foot buffer zone. Natural erosion from the Tombigbee River has reduced the buffer zone of the landfill to less than 100 feet.
- Variance from Rule 335-13-4-.20(3)(ii)(c)2, the maximum final grade of the final cover system shall not exceed 25 percent. GP requests to retain the current allowance to not exceed 3:1 slope.
- Variance from Rule 335-13.4-.23(1)(b) which requires compaction in lifts no greater than two feet. GP requests that the current permit language is retained: "The Permittee shall spread waste in layers of five feet or less in thickness and compacted with a bulldozer or equivalent equipment prior to placing additional layers of waste or placing cover."
- Variance from Rule 335-13-4-.23(1)(a)1, A minimum of six inches of compacted earth or other alternative cover material that includes but is not limited to foams, geosynthetic or waste products, and is approved by the Department shall be added at the conclusion of each week's operation. GP request to continue the current permit allowance of "conclusion of each month's operations".
- Variance from Rule 335-13-4-.22(2)(a) which requires the permittee to prevent scavenging and salvaging operations, except as part of a controlled recycling effort approved by the Department. GP requests that the current permit language is retained: "The Permittee is allowed to stage, recover and recycle some of the lime by-product materials as part of beneficial re-use of waste materials in such a manner that the materials is required to be staged on in-active portion of the landfill Cell #4 and removed from a level surface at the top of the staging mound, with a front-end loader placing the material into dump trucks."
- Finally, GP requests the current approval to utilize soil-like waste material (wastewater treatment sludge, green liquor dregs, ash, lime, wood chips, sawdust, knots and bark) as an alternative cover material as per Rule 335-13-4-.15(1) be maintained with the permit renewal.

The following variances are requested to be continued for Landfill Permit 12-04 (Landfill #2):

- Variance from Rule 335-13-4-.20(3)(ii)(c)2, the maximum final grade of the final cover system shall not exceed 25 percent. GP requests to retain the current allowance to not exceed 3:1 slope.
- Variance from Rule 335-13-4-.23(1)(b) which requires compaction in lifts no greater than two feet. GP requests that the current permit language is retained: "The Permittee shall spread waste in layers of five feet or less in thickness and compacted with a bulldozer or equivalent equipment prior to placing additional layers of waste or placing cover."
- Variance from Rule 335-13-4-.22(2)(a) which requires the permittee to prevent scavenging and salvaging operations, except as part of a controlled recycling effort approved by the Department. Similar to Landfill #1, GP requests approval to stage, recover and recycle some of the lime by-product materials as part of beneficial re-use of those materials.

As requested, a Groundwater Monitoring Plan and an Operations Plans that covers both Landfill #1 and Landfill #2 has been included. A Compliance Plan Drawing (3660532-C03) shows all gas monitoring wells, groundwater monitoring wells, closed and open areas of the current landfill 12-02. This drawing is provided as an appendix to the groundwater monitoring plan.

Waste screening procedures are referenced in the Landfill Operation Plan in Section 2.2. This plan covers each landfill permit and will be updated as needed when Landfill #2 is built.

Leachate from Landfill #1 is collected in the Reclaim Pond and the Spill Pond. All stormwater and leachate from Landfill #1 are conveyed to the mill's NPDES permitted effluent wastewater treatment system.

Should you have any questions or require any additional information, please contact Shawn Williams at (205) 459-1568.

Sincerely,



Deborah Coduto
VP – Manufacturing

Attachments:

- 1 Groundwater Monitoring Plan
- 2 Landfill Operations Plan
- 3 ADEM Form 439 Solid Waste Application
- 4 Landfill Drawing 3660532 (Landfill #1)
- 5 Landfill #2 Drawing

SOLID WASTE APPLICATION

PERMIT APPLICATION
SOLID WASTE DISPOSAL FACILITY
ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
(Submit in Triplicate)

1. Facility type: Municipal Solid Waste Landfill (MSWLF)
 Industrial Landfill (ILF)
 CCR Landfill (CCRLF)
 CCR Surface Impoundment (CCRSI)
 Other (explain) _____

2. Facility Name Georgia-Pacific Consumer Products LP Landfill #2

3. Applicant:

Name: Georgia-Pacific Consumer Operations LLC

Address: 7530 Highway 114

Pennington, Alabama 36916

Telephone: (205) 459-1900

4. Location: (include county highway map or USGS map)

Township 15 North Range 1 West

Section 36 County Choctaw

5. Land Owner:

Name: Georgia-Pacific Consumer Operations LLC

Address: 133 Peachtree Street, NE

Atlanta, GA 30303

Telephone: (404) 652-4000

(Attach copy of agreement from landowner if applicable.)

6. Contact Person:

Name Shawn Williams

Position or
Affiliation Senior Environmental Engineer

Address: 7530 Highway 114
Pennington, Alabama 36916

Telephone: (205) 459-1568

7. Size of Facility: 182.51 Acres Size of Disposal Area(s): 48.5 Acres

8. Identify proposed service area or specific industry that waste will be received from:

Georgia-Pacific Consumer Operations LLC, Naheola pulp and paper mill located near Pennington, Alabama. This renewal is for the future landfill permit 12-04

9. Proposed maximum average daily volume to be received at landfill (choose one):

 Tons/Day 8,000 Cubic Yards/Day

10. List all waste streams to be accepted at the facility (i.e., household solid waste, wood boiler ash, fires, trees, limbs, stumps, etc.):

Non-hazardous industrial waste including but not limited to: Wood waste (bark, Wood chips, waste wood), recausticizing waste (lime mud, slaker grit, green liquor Dregs, powder lime), Pulp mill waste (knots, pulp), General trash, construction debris (concrete, lumber, metal), Boiler ash, wastewater treatment sludge and Special Waste

DWS C/ls
SIGNATURE

6/22/20
DATE



Georgia-Pacific Consumer Operations LLC
Naheola Mill
Pennington, Alabama

INDUSTRIAL LANDFILL OPERATIONS PLAN

Alabama Solid Waste Permit No. 12-02

Georgia-Pacific Consumer Operations LLC, Naheola Mill (GP) operates industrial solid waste Landfill No. 1 at the Naheola Mill located in Pennington, Alabama. The Landfill No. 1 site is secured by fencing and accessed from Alabama Highway 114 onto an internal mill road. Landfill operations entail waste hauling, waste placement, leachate collection system maintenance, pump station operation and maintenance, final cover maintenance, and storm water management.

GP also maintains a permit for a second, yet to be constructed landfill. The second landfill, Landfill No. 2, will operate under Permit No. 12-04 when constructed. Landfill No. 2 operations are anticipated to be the same as those described for Landfill No. 1. The methods, procedures, and activities described in this plan will also be used for Landfill No.2. An Industrial Landfill Operations Plan specific to the details of Landfill No. 2 will be submitted to ADEM for review prior to Landfill No. 2 operation.

PART 1 GENERAL

1.1 REFERENCES

- 1.1.1 State of Alabama Solid Waste Management Permit No. 12-02 (Permit)
- 1.1.2 State of Alabama Solid Waste Program Regulations (Rule)
- 1.1.3 Naheola Landfill permit applications (initial, modifications, and renewals)
- 1.1.4 Naheola Landfill Operational and Closure Narrative
- 1.1.5 Naheola Landfill Explosive Gas Monitoring Plan
- 1.1.6 Georgia-Pacific Consumer Operations LLC Naheola Mill Contractor Safety Requirements
- 1.1.7 Georgia-Pacific Consumer Operations LLC Naheola Mill Contractor Insurance Requirements

1.2 DEFINITIONS

- 1.2.1 Owner: Georgia-Pacific Consumer Operations LLC
- 1.2.2 Operator: H&M Construction, LLC
- 1.2.3 ADEM: Alabama Department of Environmental Management (ADEM)
- 1.2.4 **Industrial solid waste** means solid waste generated by manufacturing or industrial processes that is not a hazardous waste regulated under Chapters 22 to 30, inclusive, of Title 22, Code of Alabama 1975, and the regulations promulgated thereunder. [Rule 335-13-1-.03]

1.2.5 Approved Wastes [Permit III.B]

1.2.5.1 Non-Hazardous Industrial wastes

- 1.2.5.1.1 Wood waste: knots, bark, and woodchips
- 1.2.5.1.2 Reausticizing waste: slaker grits, knotter rejects, green liquor dregs, lime mud, and powder lime
- 1.2.5.1.3 Refuse waste: plastic wrap, paper, and trash from mill dumpsters
- 1.2.5.1.4 Construction and demolition waste
- 1.2.5.1.5 Dried or dewatered wastewater treatment sludge
- 1.2.5.1.6 Ash and approved special wastes

1.3 SAFETY

- 1.3.1 All Contractors Working at the Georgia-Pacific Naheola Mill must complete safety training prior to starting any work.
- 1.3.2 Georgia-Pacific Safety Manager: Carlos D. Cairl
 - 1.3.2.1 E-mail: CARLOS.CAIRL@gapac.com
- 1.3.3 All Contractors working at the GP Naheola Mill site must also be registered with ISNetworld and become an approved supplier of services to GP.
- 1.3.4 All contractors must follow Naheola Mill guidelines as described in the following documents:
 - 1.3.4.1 Contractor Safety Guide
 - 1.3.4.2 Contractors Guide to Safe Operations
- 1.3.5 All Contractors must have prior approval for any chemicals brought onto the GP Naheola Mill site.

1.4 QUALITY ASSURANCE

- 1.4.1 Contractor will maintain all certifications, proof of insurance, vehicle registrations, and other pertinent records on site.
- 1.4.2 Contractor shall provide, properly operate, and maintain equipment necessary for the solid waste handling.
- 1.4.3 Upon presentation of credentials and other documents as may be required by law, ADEM employees or their authorized representatives shall be allowed to [Permit I.E.8]:

- 1.4.3.1 Enter at reasonable times the premises where the regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit.
 - 1.4.3.2 Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit.
 - 1.4.3.3 Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit.
 - 1.4.3.4 Sample or monitor, at reasonable times, any substances or parameters at any location for the purposes of assuring permit compliance or as otherwise authorized by Code of Alabama 1975, §§ 22-27-1 *et seq.*
- 1.4.4 Laboratory methods must be those specified in Standard Methods for the Examination of Water and Wastewater (American Public Health Association, latest edition), Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020), Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA Publication SW-846, latest edition), other appropriate EPA methods, or as specified in the Application. [Permit I.E.9]

1.5 QUALITY CONTROL

- 1.5.1 Random inspections of waste loads are to be conducted and recorded in the operating record (refer to Section 2.2). [Permit I.G.2 and 3]
- 1.5.2 Placement of waste must be restricted to the permitted operating area [Permit III.A.2]
- 1.5.3 Waste slopes, working face and capped slopes, to be maintained at 33 percent (3 horizontal feet for each vertical foot) should be determined with a tape measure, hand level, or similar device. [Permit III.D; Permit VIII.2]
- 1.5.4 A minimum of 6 inches of compacted earth or soil-like waste material or alternative cover material approved by ADEM shall be placed over waste materials at the end of each week. [Permit III.D; Permit VIII.4]
- 1.5.5 Waste disposal is not to exceed 3,000 cubic yards per day. [Permit III.A.3]

1.6 DIVERSION OF RESIDUALS

- 1.6.1 GP Naheola may divert residuals to beneficial uses. Removal of material from the landfill requires approval from ADEM.
- 1.6.2 Excess lime can be staged in the active portion of the landfill and subsequently removed for processing or beneficial use. [Permit VIII.5]

PART 2 EXECUTION

2.1 TRANSPORT

Trucks transporting waste must be waterproof, properly maintained, and clean. There can be no accumulated waste on the body of the truck so that material will not fall off the truck. Drivers shall be competent and fully qualified, licensed to operate vehicles and trucks necessary to haul materials in accordance with all applicable laws, rules, regulations, and ordinances. Transport will occur on private roads on GP property.

- 2.1.1 Drivers will take all necessary precautions to prevent spills of materials from vehicles. All spills from vehicles must be cleaned up immediately. The Naheola Mill environmental department shall be notified immediately of all spills.
- 2.1.2 An all-weather access road leading to the dumping face will be maintained to allow passage of collection vehicles. [Permit III.G]

2.2 CONTROL OF UNAUTHORIZED WASTE

- 2.2.1 Waste to be disposed of at the landfill will be restricted to the materials described in Section 1.2.5, in accordance with the operating permit. The disposal facility shall be operated in such a manner that there will be no water pollution or unauthorized discharge. [Permit II.D]
- 2.2.2 The operator will conduct random inspections of waste loads to ensure that incoming loads do not contain free liquids, regulated hazardous wastes, medical wastes, or regulated PCB wastes. [Permit II.C]

Waste inspection at the landfill will include the following steps:

- 2.2.2.1 Training truck drivers responsible for waste hauling and dumping on the types of acceptable wastes, inspection protocol for each load, and contingency actions to take if a load of unacceptable waste is discovered.
- 2.2.2.2 Visual inspection of each load deposited in the landfill by the truck driver or landfill operator. The Naheola Mill environmental department shall be notified immediately of suspect waste materials.
- 2.2.2.3 Records of all inspections should include origin of waste suspected to be regulated hazardous, medical, or PCB waste if known; transporters; and certifications from generators provided to facility personnel. These records must be maintained in the operating record of the facility.

- 2.2.3 Prior to disposal of industrial waste, the permittee shall determine that the material to be disposed does not contain free liquids, regulated hazardous wastes, regulated medical wastes, or regulated PCB wastes. [Rule 335-13-4-.21(1)(c)]
 - 2.2.3.1 Certification shall be renewed or revised biennially (every two years) or at such time that operational changes at the point of generation could render the waste hazardous, whichever is more frequent and submitted to ADEM for approval. [Rule 335-13-4-.21(1)(c)2]
 - 2.2.3.2 Copies of these certifications and approvals shall be maintained on file in the operating record of the facility and shall be made available for ADEM upon request. [Rule 335-13-4-.21(1)(c)5]
- 2.2.4 Prevention of hazardous or other unauthorized waste from disposal in the Industrial Landfill will rely on the following elements:
 - 2.2.4.1 Unauthorized wastes include hazardous waste as defined by and subject to Alabama Hazardous Waste Management Regulations and Subtitle C of the Federal Resource Conservation and Recovery Act (RCRA). Unauthorized wastes include free liquids, regulated hazardous wastes, regulated medical wastes, or regulated polychlorinated biphenyl (PCB) waste as described under Section 335-13-4-.21, Section 1, Paragraph B of the Rule.
 - 2.2.4.2 There should be no disposal of bulk or noncontainerized liquid waste, or containers capable of holding liquids, unless the conditions of Rule 335-13-4-.23(1)(j) are met. [Permit Section III.L]
 - 2.2.4.3 Training of facility personnel to recognize free liquids, regulated hazardous wastes, regulated medical wastes, and regulated PCB wastes [Rule 335-13-4-.21(1)(b)4]
 - 2.2.4.4 Empty containers larger than 10 gallons in size must be rendered unsuitable for holding liquids prior to disposal in the landfill unless otherwise approved by ADEM. [Permit Section III.M]
 - 2.2.4.5 Only waste from Naheola Mill operations will be disposed of in the landfill.
- 2.2.5 Vector control shall be provided as required by ADEM Admin. Code Division 13. [Permit III.K]

- 2.2.6 Contingency actions to be implemented by Naheola Mill environmental staff if a waste load appears outside the list of acceptable waste will generally entail the following: [Rule 335-13-4-.21(1)(b)5]
 - 2.2.6.1 Isolation of the waste load from the rest of the waste
 - 2.2.6.2 Inspection and possibly testing to determine the type, source, and nature of the material
 - 2.2.6.3 Treatment as necessary in-place to prevent hazards to human health and safety and the environment
 - 2.2.6.4 Removal from the landfill to be treated and disposed as appropriate
 - 2.2.6.5 Document contingency actions in writing and add to the landfill operating record
 - 2.2.6.6 Procedures for notifying the proper authorities if free liquids, regulated hazardous wastes, regulated medical wastes, or regulated PCB wastes are discovered at the facility
- 2.2.7 Records of random inspections will be maintained on file for three years.
- 2.2.8 In the event of noncompliance with the Permit, all reasonable steps will be taken to minimize releases to the environment, and all measures shall be carried out that are reasonable to prevent significant adverse impacts on human health or the environment. [Permit I.E.5]

2.3 WASTE STREAMS

- 2.3.1 Acceptable non-hazardous industrial waste is comprised of wood waste (including unusable wood chips, knots, and bark), recausticizing waste (including slaker grits, knotter rejects, green liquor dregs, lime mud, powder lime), knots, refuse waste (including plastic wrap, paper, trash from mill dumpsters), construction and demolition wastes, dried or dewatered wastewater treatment sludge, ash and approved special wastes generated at Georgia-Pacific Consumer Operations LLC Naheola Pulp and Paper mill.
- 2.3.2 GP must keep a copy of approved Solid Waste Determination Forms for Industrial Wastes and associated ADEM correspondence in the facility operating record.

2.4 WASTE PLACEMENT

- 2.4.1 Subject to terms of the GP Naheola Mill Industrial Solid Waste Landfill Permit No. 12-02, disposal of wastes listed in the permit is granted. Disposal of any other wastes is prohibited, except waste granted a temporary or one time waiver by the Director. [Permit III.A]
- 2.4.2 The landfill shall be operated according to the State of Alabama Solid Waste Management Permit No. 12-02 and any other applicable permits.
- 2.4.3 The total permitted area for the GP Naheola Mill Landfill is approximately 38.55 acres. [Figure 1 (attached) and Permit III.A.2]
- 2.4.4 The maximum average daily volume of waste disposed at the facility shall not exceed 3,000 cubic yards per day, the permitted maximum, except as provided under Regulation Rule 335-13-5-0.6(2)(a)5. The average daily volume shall be computed as specified by Regulation Rule 335-13-5-.06(2)(a)5.(i). [Permit III.A.3]
- 2.4.5 Waste will be conveyed from production areas to the landfill in dump trucks, roll-off containers, and similar waste transport vehicles that will deposit the load at the active working face.
- 2.4.6 Fill will be spread over the working face with a bulldozer or wheeled loader in the following manner:
 - 2.4.6.1 Waste fill will start from the west (Figure 1, plant coordinates) end of the active area and progress to the east
 - 2.4.6.2 Waste fill will be graded to form a ridge that mimics the final grading configuration (Figure 2)
 - 2.4.6.3 A perimeter storm water ditch will be established around the perimeter of the active area with a high point on the west side and discharge to the inlet structure at the east end (Figure 1)
 - 2.4.6.4 Waste fill will be placed to maintain positive drainage from the working face to the perimeter ditch
 - 2.4.6.5 As the working phase is filled, the lift and side slopes will be kept dressed and shaped as required to minimize material migration due to rain or wind.
- 2.4.7 Side slopes of 3 horizontal to 1 vertical (3H:1V, maximum) are to be maintained to provide a stable lift with adequate drainage and erosion resistance. A variance to spread waste in layers up to 5 feet in thickness. [Permit Section VIII.3]

- 2.4.8 Industrial waste shall be disposed of as required by Rule 335-14-4-.21(1)(c), and as specified in the Application. GP Naheola Mill must keep a copy of approved Solid/Hazardous Waste Determination Forms for all the Industrial Wastes disposed and any associated ADEM correspondence in the facility operating record. [Permit II.E]
- 2.4.9 The facility shall be identified with a permanent boundary markers that are visible from one marker to the next. [Permit II.F]
- 2.4.10 A variance has been granted from ADEM Rule 335-13-4-.22(1)(b) concerning operations of the working face. The Naheola Mill is allowed an additional working space in cell 4 while construction of cell 3 is being completed. [Permit III.D; Permit VIII.7]
- 2.4.11 A variance has been granted from ADEM Rule 335-13-4-.23(1)(a) which requires a minimum of six inches of weekly soil cover. An alternative weekly cover may be used. [Permit III.D; Permit VIII.4]
- 2.4.12 Windblown litter must be collected and disposed of properly in the landfill [Rule 335-13-4-.23(2)(b)] with the following operating measures:
 - 2.4.12.1 Manage each waste load that contains materials prone to blowing beyond the working face at the time the load dumped
 - 2.4.12.2 Prepare for high wind conditions in advance by placing extra soil-like cover over materials prone to blowing
 - 2.4.12.3 Cover materials prone to blowing promptly if they are exposed by erosion or landfill operations
- 2.4.13 Scavenging and salvaging will not be allowed unless conducted as part of a controlled recycling effort approved by ADEM. [Permit III.P].
- 2.4.14 Surface ditching and leachate collection piping should be inspected and cleaned on a regular basis.
- 2.4.15 Manpower and Training
 - 2.4.15.1 Waste hauling and disposal for the landfill will be conducted by a qualified landfill operations personnel. Approved GP Naheola Mill construction and maintenance contractors will be able to obtain access to the landfill. Adequate personnel and equipment to facilitate landfill operations and maintenance must be present at all times. [Permit III.I]
 - 2.4.15.2 Disposal activities shall be provided during adverse weather conditions. [Permit III.H]

- 2.4.15.3 Additional personnel and equipment will be provided as necessary by GP Naheola Mill or Contractor to perform tasks that include the following:
 - 2.4.15.3.1 Waste hauling,
 - 2.4.15.3.2 Berm and cell construction,
 - 2.4.15.3.3 Leachate collection system installation,
 - 2.4.15.3.4 Final cover installation, and
 - 2.4.15.3.5 Inspections and monitoring.
- 2.4.15.4 Operator training will be conducted by the operator. Training will include hands-on demonstrations and written documentation of instructional materials. Each employee will receive an annual update. Records of the type and amount of training for current employees will be maintained in the landfill operating record. Training may include:
 - 2.4.15.4.1 Overview of the operations procedures,
 - 2.4.15.4.2 Review of permits and regulations,
 - 2.4.15.4.3 General landfill safety procedures pertaining to work around waste and leachate,
 - 2.4.15.4.4 Operation and maintenance of equipment, machinery, and systems which the employee must operate, service, or monitor during daily duties,
 - 2.4.15.4.5 Emergency response procedures, and
 - 2.4.15.4.6 Emergency shutdown procedures.

2.4.16 Equipment

- 2.4.16.1 Full time operational equipment will consist of at least one bulldozer and several dump trucks. The bulldozer will be utilized to spread waste as delivered to the working face. The dump trucks will haul waste from the source to the landfill. This process will be a continuous operation such that waste will be hauled to the landfill while other trucks are being loaded. A tracked excavator and a backhoe will be available for use at the landfill as required.

- 2.4.16.2 Preventative maintenance of the landfill equipment will be performed. Manufacturer's recommendations will dictate the maintenance schedule. Maintenance activities will include the establishment of a routine inspection program and the lubrication of equipment according to manufacturer's recommendations. Maintenance records, where appropriate, will be kept in the mill maintenance database.

2.5 FIRE CONTROL MEASURES

- 2.5.1 Open burning of solid waste at the disposal area will not occur without written approval from ADEM and other appropriate agencies. A burn request should be submitted in writing to ADEM outlining why that burn request should be granted. This request should include, but not be limited to, specifically what areas will be utilized, types of waste to be burned, the projected starting and completion dates for the project, and the projected days and hours of operation. The approval, if granted, shall be included in the operating record. [Permit II.B]
- 2.5.2 Wood waste could catch fire from spontaneous combustion or other ignition sources. Waste lift heights will be limited to five feet to reduce the chance of self-combustion. Ash will be used to control and prevent the spread of fires that might occur.

2.6 MAINTENANCE

- 2.6.1 The operator shall maintain the landfill, roads, and property in good condition. [Permit I.E.6]
- 2.6.2 The operator will inspect the perimeter ditch around the active area daily and conduct maintenance necessary to maintain positive drainage to the inlet structure.
- 2.6.3 The operator will inspect the drainage piping within the operating area and around the perimeter of the closed area daily and conduct maintenance necessary to maintain the integrity of the piping and provide adequate drainage for leachate and storm water that has contacted waste.
- 2.6.4 The operator will inspect the stilling basin adjacent to the storm water inlet in the active area daily and conduct maintenance to provide necessary settling capacity as necessary.
- 2.6.5 The operator will inspect the leachate pumping system daily. All problems shall be reported promptly to environmental department. [Permit I.E.8.c]
- 2.6.6 ADEM may enhance or reduce any requirements for operating and maintaining the landfill as deemed necessary by the Land Division. [Permit III.N]

2.7 GAS MONITORING

- 2.7.1 Annual monitoring of 22 explosive gas monitoring wells is required in accordance with the Explosive Gas Monitoring Plan. [Permit Section V]

2.8 GROUNDWATER MONITORING

- 2.8.1 Groundwater monitoring wells and piezometers including; W-19, W-20, W-21, W-22, and W-23 are the groundwater monitoring wells for the entire landfill. [Permit IV.A.1; Permit Table IV.1]
- 2.8.2 Additional monitoring wells shall be installed and maintained as necessary to assess changes in the rate and extent of contamination or as otherwise deemed necessary to maintain compliance with the Rule. [Permit IV.A.3]
- 2.8.3 Prior to additional monitoring well installation, a report shall be submitted to ADEM with a permit modification request specifying the design, location and installation of any additional monitoring wells. This report, to be submitted 90 days prior to the installation, shall include [Permit IV.A.4]:
- 2.8.3.1 Well construction techniques including proposed casing depths, proposed total depth, and proposed screened interval of well(s)
 - 2.8.3.2 Well development method(s)
 - 2.8.3.3 A complete analysis of well construction materials
 - 2.8.3.4 A schedule of implementation for construction
 - 2.8.3.5 Provisions for determining the lithologic characteristics, hydraulic conductivity and grain-size distribution for the applicable aquifer unit(s) at the location of the new well(s)
- 2.8.4 Groundwater monitoring wells shall be maintained and sampled at least semi-annually throughout the active life and post-closure care period of the landfill. [Permit IV.B.3]
- 2.8.5 All monitoring wells listed in Section 2.8.1 shall be sampled and analyzed for parameters listed in Appendix I of Rule 335-13-4-.27(3), and any other parameters specified by ADEM in Table IV.3 of the Permit. Sampling shall be conducted during March and September of each year. [Permit IV.B.3]
- 2.8.6 A record of water levels, mean sea level elevation measuring point, depth to water, and results of field tests for pH and specific conductance at the time of sampling each well will be kept. [Permit IV.B.4]
- 2.8.7 Groundwater flow rate and direction within the first zone of saturation will be determined at least semi-annually or each time groundwater is sampled. [Permit IV.B.2]

- 2.8.8 Groundwater surface elevation at each monitoring well and piezometer identified in Table IV.1 shall be determined each time the well or piezometer is sampled and at least annually throughout the active life and post-closure care period. [Permit IV.B.1]

2.9 SAMPLING AND ANALYSIS PROCEDURE

- 2.9.1 Samples shall be collected, preserved, and shipped (when shipped off-site for analysis) in accordance with the procedures specified in the Application. Monitoring wells shall be bailed or pumped to remove at least three to five times the well volume of water. Slow recharge wells shall be bailed until dry. Wells shall be allowed to recharge prior to sampling. [Permit IV.C.1]
- 2.9.2 Samples and measurements taken for the purpose of monitoring or corrective action shall be representative of the monitored activity.
- 2.9.3 Samples shall be analyzed according to the procedures specified of the Application, Standard Methods for the Examination of Water and Wastewater (American Public Health Association, latest edition), Methods for Chemical Analysis of Water and Wastes (EPA-600/4-79-020), Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (EPA Publications SW-846, latest edition. All field tests must be conducted using approved EPA test kits and procedures. [Permit IV.C.2]
- 2.9.4 Samples shall be tracked and controlled using the chain-of-custody and QA/QC procedures specified of the Application. [Permit IV.C.3]

2.10 LEACHATE AND SURFACE WATER MANAGEMENT

- 2.10.1 Leachate must be collected and treated in the waste treatment system. [Permit Section VI]
- 2.10.3 Run-on and run-off control structures should be maintained.
- 2.10.4 Surface water discharges from drainage control structures shall be permitted through the ADEM Water Division's National Pollutant Discharge Elimination System (NPDES) Program.

2.11 CLOSURE

- 2.11.1 A notice of intent shall be placed in the operating record and ADEM must be notified of the intent to close the landfill prior to beginning closure. [Permit VII.C]
- 2.11.2 Final soil cover should be applied such that surface water does not pond over the permitted area as specified in the Application and in compliance with ADEM Admin. Code Division 13. The final cover system shall consist of either 36 inches of dewatered wastewater treatment solids or 18 inches of soil compacted to 1×10^{-5} cm/sec as the barrier layer, six inches of topsoil, and vegetative cover. [Permit VII.A; Permit VIII.6]

- 2.11.3 Vegetative cover will be established within 90 days after completion of final grading. Preparation of vegetative cover shall include placement of seed, fertilizer, mulch, and water. [Permit VII.B]
- 2.11.4 Closure activities must be completed of each landfill unit in accordance with the Closure Plan within 180 days of the last known receipt of waste. [Permit VII.D]
- 2.11.5 Following the closure of each unit, a certification must be submitted to ADEM of their intent to close the landfill prior to beginning closure. [Permit VII.E]
- 2.11.6 Post-closure care activities shall be conducted after closure of each unit throughout the life of this permit and continuing for a period of thirty (30) years following closure of the facility. ADEM may shorten or extend the post-closure care period applicable to the solid waste disposal facility. [Permit VII.F]
- 2.11.7 Post closure maintenance of the facility shall include regularly scheduled inspections. This shall include maintenance of the cover, vegetation, monitoring devices, and pollution control equipment and correction of deficiencies that might be observed by ADEM. Monitoring requirements shall continue throughout the post closure period unless all waste is removed and no unpermitted discharge to waters of the State has occurred. [Permit VII.G]
- 2.11.8 Post closure use of the property shall never be allowed to disturb the integrity of the final cover, liner, or any other component of the containment system. This shall preclude the growing of deep-rooted vegetation on the closed area. [Permit VII.H]
- 2.11.9 Following post-closure of each unit, a certification must be submitted to ADEM, signed by an engineer, verifying the post-closure has been completed according to the Post-Closure Plan. [Permit VII.I]
- 2.11.10 A notation shall be recorded onto the land deed containing the property utilized for disposal within 90 days after permit expiration, revocation or when closure requirements are achieved as determined by ADEM as stated in the Application. This notation shall state that the land has been used as a solid waste disposal facility, the name of the Permittee, type of disposal activity, location of the disposal facility and beginning and closure dates of the disposal activity. [Permit VII.J]
- 2.11.11 ADEM must grant approval prior to removal of waste, waste residues, or any liner or contaminated soils. [Permit VII.L]

2.12 RECORDS AND REPORTING

- 2.12.1 Records of all monitoring information shall be retained for the operating life of the facility. [Permit I.E.9.b]

- 2.12.2 A closure / post-closure report that demonstrates compliance with ADEM Admin. Code Division 13 of the Regulations must be submitted to ADEM for approval within 180 days after permanent cessation of operations. [Permit VII.D]
- 2.12.3 Reports of compliance or noncompliance with or any progress reports on interim and final requirements contained in any compliance schedule required and approved by ADEM shall be submitted no later than 14 days following each schedule date. [Permit I.E.13]
- 2.12.4 All instances of noncompliance with the permit shall be reported at the time monitoring reports are submitted. [Permit I.E.14]
- 2.12.5 If it becomes aware that information required by the Application was not submitted or was incorrect in the Application or in any report to ADEM, such facts or information shall promptly be submitted. In addition, upon request, information related to compliance with the permit shall be furnished to ADEM. [Permit I.E.15]
- 2.12.6 Records of monitoring information shall include the following [Permit I.H.1]:
- 2.12.7 The Permittee shall maintain a written operating record of the landfill, including the following [Permit I.H.1]:
 - 2.12.7.1 Documentation and inspection and maintenance activities.
 - 2.12.7.2 Daily volume reports
 - 2.12.7.3 Personnel training documents and records.
 - 2.12.7.4 Solid/Hazardous Waste Determination Forms for Industrial Wastes and associated ADEM disposal approval correspondence for industrial waste and special waste.
 - 2.12.7.5 Groundwater monitoring records.
 - 2.12.7.6 Explosive gas monitoring records
 - 2.12.7.7 Surface water and leachate monitoring records (subject to applicable conditions of Section VI of the permit).
 - 2.12.7.8 Copies of the permit and the application.
 - 2.12.7.9 Copies of all variances granted by ADEM, including copies for all approvals of special operating conditions.
- 2.12.8 The Permittee shall submit a quarterly volume report within thirty (30) days after the end of each calendar quarter and maintain copies in the operating record. [Permit I.H.2]

- 2.12.9 The Permittee shall submit reports on all monitoring and corrective activities conducted pursuant to the requirements of this permit, including, but not limited to, groundwater and explosive gas. The groundwater monitoring shall be conducted in March and September of each year and the reports shall be submitted at least semi-annually. The reports should contain all monitoring results and conclusions from samples and measurements conducted during the sampling period. The explosive gas monitoring should be conducted on an annual basis and the reports should be submitted within 30 days of the monitoring event. The reports should contain all monitoring results and conclusions from samples and measurements conducted during the sampling period. Copies of the monitoring reports shall be maintained in the operating record within 30 days of the monitoring event. [Permit I.H.3]
- 2.12.10 All records including plans, required under this permit or Division 13 must be furnished upon request, and made available at reasonable times for inspection by any officer, employee, or representative of ADEM. [Permit I.H.4.a]
- 2.12.11 All records, including plans, required under this permit or Division 13 shall be retained by the Permittee for a period of at least three (3) years. The retention period for all records is extended automatically during the course of any unresolved enforcement action regarding the facility, or as requested by ADEM. [Permit I.H.4.b]
- 2.12.12 Records of waste disposal locations and quantities must be submitted to ADEM and local land authority upon closure of the facility. [Permit I.H.4.c]

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12-04

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6/23/20

PERM

Renewal Application

CBH

Received: 4/8/21

Application for Name Change or Transfer of Permit or Exemption
Alabama Department of Environmental Management

Existing Facility: The facility, site or location with the current permit or registration.

Permit or Registration No. 12-04
Expiration Date (if applicable): March 1, 2021
County: Choctaw
Facility Name: Georgia-Pacific Consumer Operations LLC
Address: 7530 Highway 114
Pennington, AL 36916
Telephone: (205) 459-1900

Application for Name Change: An application for name change must be made by the current permittee or registrant. A name change does not change any condition of the permit or registration approval.

Responsible Official Making the Request to Change the Name of the Permittee or Registrant:

Name: Deborah Coduto Title: VP-MFG-CONSUMER SOU
Signature: *Deb Coduto*
Address: 7530 Highway 114
Pennington, AL 36916

Telephone: (205) 459-1900 Change of Mailing Address: No
E-mail: Deborah.Coduto@GAPAC.com Date: 4/7/2021
Current Name: Georgia-Pacific Consumer Products LP Landfill #2
Proposed Name: Georgia-Pacific Naheola Landfill #2
Effective Date of Name Change: April 8, 2021

Person Requesting Transfer of Permit or Registration: An application to transfer must be made by the current permittee or registrant.

Name: _____ Title: _____
Signature: _____
Address: _____

Telephone: _____
E-mail: _____ Date: _____

Person Accepting Transfer of Permit or Registration: Transfer of a permit or registration does not change any condition of the permit or registration approval. By their signature below, the person accepting transfer of the permit or registration assumes all responsibility for the facility and agrees to abide by all permit or registration conditions.

Name: _____ Title: _____

Signature: _____

Address: _____

Telephone: _____ Change of Mailing Address: _____

E-mail: _____ Date: _____

Landowner: (Signature of the landowner(s) acknowledges that this application is being made and is required if the applicant is different from the landowner).

Name: Deborah Coduto Title: VP-MFG-CONSUMER SOU

Signature: *Deborah Coduto*

Address: 7530 Highway 114

Pennington, AL 36916

Telephone: (205) 459-1900

Fees: Include the appropriate application fees with this form. Appropriate fees may be found in ADEM Admin. Code 335-1-6.

7. Submittal: Submit this form and applicable fees to:

Alabama Department of Environmental Management
Solid Waste Branch

P.O. Box 301463 (mailing address)
Montgomery, AL 36130-1463

1400 Coliseum Blvd. (physical address)
Montgomery, AL 36110-2059

An electronic version of this application may be submitted to ADEM at: TireMail@adem.alabama.gov. All attachments to this application must also be submitted in an electronic version.

For additional information, contact the Solid Waste Branch at: 334-271-7988.

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12-04

023

4/8/21

PERM

Name Change Application

CBH