

April 18, 2017

Ms. Brandi Coleman Mondi Bag, USA P.O. Box 20700 Pine Bluff, AR 71612

RE: Quarterly Inspection conducted on April 11, 2017 AFIN 35-00017 Permit Number 0243-S3N-R2

Dear Ms. Coleman:

The Arkansas Department of Environmental Quality – Office of Land Resources (ADEQ) conducted a routine inspection of your facility pursuant to the Arkansas Solid Waste Management Act (Arkansas Code, Annotated, § 8-6-201 <u>et seq.</u>), of 1971, as amended, the Arkansas Pollution Control & Ecology Commission Regulation 22 (Solid Waste Management), and the above-referenced permit. At the time of the inspection, no allegations of noncompliance were noted at your facility. A copy of the inspection report is attached.

If I can be of any further assistance, please do not hesitate to contact me at (870) 247-5155 or <u>gentry@adeq.state.ar.us</u>.

Sincerely,

Holly Sintry

Bobby Gentry Solid Waste Inspector Office of Land Resources

Attachment

cc: Tammie J. Hynum, Acting Sr. Operations Manager, Office of Land Resources



## Arkansas Department of Environmental Quality Office of Land Resources -Solid Waste Management Class 3 Landfill Inspection



| Site Name         | Mondi Bag USA                                                      | County                 | Jefferson                    | AFIN          | 35-00017            |  |  |  |  |
|-------------------|--------------------------------------------------------------------|------------------------|------------------------------|---------------|---------------------|--|--|--|--|
| Facility Address  | North of Pine Bluff in the Industrial Park                         | Phone Number           | 870-541-5074<br>870-541-5000 | Permit Number | 0243-S3N-R2         |  |  |  |  |
| Permittee Address | P.O. Box 20700, Pine Bluff, AR 71612                               | E-Mail Address         | None                         | ·             | <b>PDS #</b> 096584 |  |  |  |  |
| Date              | 4-11-17                                                            | Entry Time             | 9:15 am                      | Exit Time     | 10:30 am            |  |  |  |  |
|                   | Regu                                                               | lation 22 – Operationa | al Standards                 |               |                     |  |  |  |  |
|                   |                                                                    | Category 1             |                              |               |                     |  |  |  |  |
| Regulation        | Item Description         Comments                                  |                        |                              |               |                     |  |  |  |  |
| 510(l)            | Adequate employee facilities                                       |                        |                              |               |                     |  |  |  |  |
| 520(a)(b)         | Record keeping meets requirements specified by regulations         |                        |                              |               |                     |  |  |  |  |
| 516               | Access requirements                                                |                        |                              |               |                     |  |  |  |  |
| 510(j)            | Adequate provisions for backup equipment                           |                        |                              |               |                     |  |  |  |  |
| 520(c)            | Waste receipt records, ticket system maintained                    |                        |                              |               |                     |  |  |  |  |
| 510(k)            | Telephone system & written emergency response plan on site         |                        |                              |               |                     |  |  |  |  |
| 522(a)            | Annual compliance inspection by register professional engineer     |                        |                              |               |                     |  |  |  |  |
| 521               | Facility implements operating plan and narrative                   |                        |                              |               |                     |  |  |  |  |
| 520(a)(4)         | Leachate disposal/recirculation records                            |                        |                              |               |                     |  |  |  |  |
| 701, 520(a)(2)    | Special waste disposal and procedures records                      |                        |                              |               |                     |  |  |  |  |
|                   |                                                                    | Category 2             |                              |               |                     |  |  |  |  |
| Regulation        | Item Description                                                   |                        |                              | Comments      |                     |  |  |  |  |
| 510(a)            | Operations in accordance with permit documents                     |                        |                              |               |                     |  |  |  |  |
| 516(c)            | Adequate all weather operational roads                             |                        |                              |               |                     |  |  |  |  |
| 510(c)            | Smallest practical area, unloading supervised, single working face |                        |                              |               |                     |  |  |  |  |
| 510(e)            | Salvage operations meet approved conditions                        |                        |                              |               |                     |  |  |  |  |
| 510(f)(l)         | Scavenging of waste prohibited                                     |                        |                              |               |                     |  |  |  |  |
| 510(o)            | Proper wet weather repairs                                         |                        |                              |               |                     |  |  |  |  |
| 510(b)            | Operations by licensed on-site personnel at all times              |                        |                              |               |                     |  |  |  |  |
| 510(d)            | Waste spread and compacted as unloaded                             |                        |                              |               |                     |  |  |  |  |
| 510(g)            | Litter control provisions maintained                               |                        |                              |               |                     |  |  |  |  |
| 513(a)            | Disease vectors controlled                                         |                        |                              |               |                     |  |  |  |  |

| Category 2 (continued)                                                                                                                       |                                                                                                                                   |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|-----------|--------------|-----------------------|-------------|----------------------|-----------|----------|--|--|
| Regulation                                                                                                                                   |                                                                                                                                   | Item Description                                              | Comments                                                                                                           |           |              |                       |             | nments               |           |          |  |  |
| 518                                                                                                                                          | Surface water controls                                                                                                            |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 510(h)(l)                                                                                                                                    | Contouring                                                                                                                        | g prevents surface water flowing into or thr                  | ough waste                                                                                                         |           |              |                       |             |                      |           |          |  |  |
| 517(a)(b)                                                                                                                                    | Run-on/off                                                                                                                        | f control system present and adequate                         |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 510(h)(2)                                                                                                                                    | Surface water control prevents off-site sediment accumulation         Adequate maintenance of intermediate/final cover vegetation |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 510(h)(i)                                                                                                                                    | Gas monitoring program                                                                                                            |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 514                                                                                                                                          | Gas monit                                                                                                                         | oring program                                                 |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 510(n)                                                                                                                                       | Leachate l                                                                                                                        | eaks or evidence of leachate seepage                          |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 526                                                                                                                                          | Leachate leaks or evidence of leachate seepage         Survey controls                                                            |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 529                                                                                                                                          | Leachate collection system       Liquid restrictions       Category 3       Comments                                              |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 519                                                                                                                                          | Liquid rest                                                                                                                       | trictions                                                     |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
|                                                                                                                                              |                                                                                                                                   |                                                               | Cat                                                                                                                | egoi      | ry 3         |                       |             |                      |           |          |  |  |
| Regulation                                                                                                                                   |                                                                                                                                   | Item Description                                              | Comments                                                                                                           |           |              |                       |             |                      |           |          |  |  |
| 511                                                                                                                                          | Implement                                                                                                                         | Implementation of hazardous/unauthorized waste exclusion plan |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 512(a)(c)                                                                                                                                    | Satisfactory daily/alternative cover                                                                                              |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 512(b)                                                                                                                                       | Satisfactory intermediate cover                                                                                                   |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 515(b), 510(f)(4)                                                                                                                            | Open burning prohibited                                                                                                           |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 518                                                                                                                                          | Cause discharge/leachate discharge leaving landfill                                                                               |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 510(f)(3), 518(a)(4)                                                                                                                         | Cause discharge/leachate discharge leaving landfill Depositing waste in standing water prohibited                                 |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| 510(n)                                                                                                                                       |                                                                                                                                   |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| <b>309(c</b> )                                                                                                                               | Overfill/of                                                                                                                       | f lined area                                                  |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
|                                                                                                                                              |                                                                                                                                   | Re                                                            | gulation                                                                                                           | 22 -      | Records      |                       |             |                      |           |          |  |  |
| 520(a)(8), 204(b) D                                                                                                                          | December 14, 2016 Site Condition                                                                                                  |                                                               |                                                                                                                    | tions Wet |              |                       |             |                      |           |          |  |  |
| 522 D                                                                                                                                        | 522 Date of last engineering report                                                                                               |                                                               |                                                                                                                    |           |              |                       |             | er Conditions Cloudy |           |          |  |  |
| 528 Li                                                                                                                                       | Notice of liner construction Yes/No No                                                                                            |                                                               |                                                                                                                    |           | Chird part ( | CQA on-site during    | constructio | n Yes/No No          |           |          |  |  |
|                                                                                                                                              |                                                                                                                                   | ndom inspection for unauthorized waste                        | Every load Total # for month March                                                                                 |           |              | <b>514</b>            | <b></b>     |                      | t? Yes/No |          |  |  |
|                                                                                                                                              |                                                                                                                                   | arterly methane monitoring<br>ecial waste received            | None         Detection level         514         Explosive gas records of           None         Disposal location |           |              |                       | ords curren |                      |           |          |  |  |
|                                                                                                                                              |                                                                                                                                   | ter waste received                                            | 444.06                                                                                                             |           | Tons         | 1 <sup>st</sup> QTR 2 | 017         |                      |           |          |  |  |
| 520(c)     Freehous quarter waster received     Freehous quarter waster received       527     Surface water DMR records current?     Yes/No |                                                                                                                                   |                                                               |                                                                                                                    |           |              |                       |             |                      |           |          |  |  |
| Operator Name & Nu                                                                                                                           | Signature of Inspector                                                                                                            |                                                               |                                                                                                                    | ſ         | Bdl          | y Acutry              |             |                      |           |          |  |  |
| Exit Interview Condu                                                                                                                         | icted with                                                                                                                        | Keith Swilling Lic: 000420                                    | Method                                                                                                             | Ons       | ite          | Date                  | 4-11-17     |                      | Time      | 10:15 am |  |  |

## Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

| Location    | Mon                      | di Bag I | USA      |        |         | Permit  | 0243-S3N-  | -R2          | AFIN  | 35-00017 |
|-------------|--------------------------|----------|----------|--------|---------|---------|------------|--------------|-------|----------|
| Photograph  | hotographer Bobby Gentry |          |          |        | Witness | ]       | Keith Swil | ith Swilling |       |          |
| Photo #     | 1                        | Of       | 2        |        |         | Date    | 4-11-17    |              | Time  | 9:38 am  |
| Description |                          | West v   | iew of C | Cell 1 |         | •       | •          |              |       |          |
|             |                          |          |          |        |         |         |            |              |       |          |
|             |                          | 1.       |          |        |         | 04/1    | 1/2017     | 09:0         | 88 AM |          |
| Location    | Mor                      | ndi Bag  |          |        |         | Permit  | 0243-S3N-  | D2           | AFIN  | 35-00017 |
| Photograph  | <u> </u>                 |          | Gentry   |        | AR      | Witness |            | Keith Swil   |       | 33-00017 |
| Photo #     | 2                        | Of       | 2        |        | ~H-10-  | Date    | 4-11-17    |              | Time  | 9:51 am  |
| Description |                          |          | working  | r face |         | Date    | 1 11 17    |              | Time  | 9.91 um  |
|             |                          |          |          |        |         | 04/1    | 1/2017     | 09:5         | IAM   |          |

Inspector Signature: