

January 12, 2018

Joseph Goss, Technical Manager Mondi Bag USA P.O. Box 20700 Pine Bluff, AR 71612

RE: Quarterly Inspection conducted on January 3, 2018

AFIN 35-00017

Permit Number 0243-S3N-R2

Dear Mr. Goss:

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 gentry@adeq.state.ar.us.

Sincerely,

Bobby Gentry

Solid Waste Inspector

Adly Tentry

Office of Land Resources

Attachment

cc: Charles M. Johnson, Senior Manager Regulated Waste Operations 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 870-541-5000 | Permit Number | 0243-S3N- | R2 |
| Permittee Address | P.O. Box 20700, Pine Bluff, AR 71612 | E-Mail Address | None | | PDS# | 100941 |
| Date | 1-3-18 | Entry Time | 0830 | Exit Time | 0930 | |

Regulation 22 – Operational 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 | 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 | |
| | | |

| | | | | Categ | ory 2 (continued) | | | | | | |
|---|-----------------|--|-----------------------------|--------------------|-----------------------------------|-------------|--------------|--------------------|----------------|----------|----|
| Regulation | 1 | Item | Description | | | | Cor | nments | | | |
| 518 | Surface w | ater controls | | | | | | | | | |
| 510(h)(l) | Contouri | ng prevents surface | water flowing into or thi | rough waste | | | | | | | - |
| 517(a)(b) | Run-on/o | ff control system p | resent and adequate | | | | | | | | |
| 510(h)(2) | Surface w | ater control preve | nts off-site sediment accur | mulation | | | | | | | |
| 510(h)(i) | Adequate | maintenance of in | termediate/final cover veg | getation | | | | | | | |
| 514 | Gas moni | toring program | | | | | | | | | |
| 510(n) | Leachate | leaks or evidence o | of leachate seepage | | | | | | | | |
| 526 | Survey co | ntrols | | | | | | | | | |
| 529 | Leachate | collection system | | | | | | | | | |
| 519 | Liquid re | strictions | | | | | | | | | |
| | | | | Cat | egory 3 | | | | | | |
| Regulation | 1 | Item | Description | | | | Cor | nments | | | |
| 511 | Implemen | tation of hazardou | ıs/unauthorized waste exc | lusion plan | | | | | | | |
| 512(a)(c) | Satisfacto | ry daily/alternativ | e cover | | | | | | | | |
| 512(b) | Satisfacto | ry intermediate co | ver | | | | | | | | |
| 515(b), 510(f)(| 4) Open bur | ning prohibited | | | | | | | | | |
| 518 | Cause dis | charge/leachate dis | scharge leaving landfill | | | | | | | | |
| 510(f)(3), 518(a)(4 | 1) Depositin | g waste in standing | g water prohibited | | | | | | | | |
| 510(n) | Erosion o | r other cover defec | ts resulting in exposed re | fuse | | | | | | | |
| 309(c) | Overfill/o | ff lined area | | | | | | | | | |
| | | | Re | gulation | 22 - Records | | | | | | |
| 520(a)(8), 204(b) | Date of last gr | oundwater monito | oring report | December 8 | , 2017 | Site Condit | tions | Wet | | | |
| 522 | | ngineering report | | June 2017 | | Weather C | | Cloudy | | | |
| 528 | | ction in progress | Yes/No No | | ner construction Yes/No | | Third part (| CQA on-site during | g construction | n Yes/No | No |
| 511 514, 520(a)(3) | | indom inspection f uarterly methane r | or unauthorized waste | Every load None | Total # for month Detection level | December | 514 | Explosive gas rec | anda arrunant | Yes/No | |
| 701,520(a)(2) | | pecial waste receive | | None | Disposal location | | 514 | Explosive gas rec | orus current | 103/110 | |
| $\frac{701,320(a)(2)}{520(c)}$ | | ter waste received | | Tons | 4 th OTR | 2017 | | | | | |
| 527 | | DMR records cur | | | | | | | | | |
| Operator Name & | | Keith Swilling Li | c: # 000420 | | Signature of Inspector | | Ū | y Tentry | | | • |
| Exit Interview Conducted with Keith Swilling Lic: 000420 Method | | | | | On-site | Date | 1-3-18 | | Time | 0920 | |

Arkansas Department of Environmental Quality (ADEQ) Official Photograph Sheet

| Location | Mon | di Bag U | USA | | | Permit | 0243-S3N-R2 | AFIN | 35-00017 |
|--|-----|--|-----|--|----|---------|-----------------------|------|----------|
| Photograph | er | Bobby Gentry, ADEQ Solid Waste Inspector | | | AN | Witness | Keith Swilling, Opera | | |
| Photo # | 1 | Of 2 | | | | Date | 1-3-2018 | Time | 0854 |
| Description West view of Cell #2. | | | | | | | | | |



| Location | Mor | ndi Bag | USA | | | Permit | 0243-S3N-R2 | AFIN | 35-00017 | |
|-------------|---|----------------|-----|-------------------------|--|---------|--------------------------|------|----------|--|
| Photograph | ier | Bobby Waste | • | ntry, ADEQ Solid pector | | Witness | Keith Swilling, Operator | | | |
| Photo # | 2 | Of | 2 | | | Date | 1-3-2018 | Time | 0855 | |
| Decemintion | wintion Active working face at the end of Cell #2 | | | | | | | | | |

Active working face at the end of Cell #2. Description



Revised 3/1/2017

Inspector Signature: