

July 26, 2019

John Duncan, Technical Manager Twin Rivers Paper Company P.O. Box 20700 Pine Bluff, AR 71612

RE: Quarterly Inspection conducted on July 8, 2019

AFIN 35-00017

Permit Number 0243-S3N-R2

Dear Mr. Duncan:

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 observed 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

Enclosure

cc: David Witherow P.E., Senior Manager, Office of Land Resources



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



| Site Name | Twin Rivers Paper Company | 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 # 108671 | |
| Date | 7/8/2019 | Entry Time | 0900 Exit Time 1 | | 1000 | |

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 | | | | | | | |
| 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 | | | | | | Con | nments | | | |
| 518 | Surface w | Surface water controls | | | | | | | | | | |
| 510(h)(l) | Contourin | ng prevents surface w | vater flowing into or t | through waste | | | | | | | | |
| 517(a)(b) | Run-on/of | ff control system pres | sent and adequate | | | | | | | | | |
| 510(h)(2) | Surface w | ater control prevents | s off-site sediment acc | cumulation | | | | | | | | |
| 510(h)(i) | Adequate | Adequate maintenance of intermediate/final cover vegetation | | | | | | | | | | |
| 514 | Gas monit | Gas monitoring program | | | | | | | | | | |
| 510(n) | Leachate | Leachate leaks or evidence of leachate seepage | | | | | | | | | | |
| 526 | Survey co | Survey controls | | | | | | | | | | |
| 529 | Leachate | Leachate collection system | | | | | | | | | | |
| 519 | Liquid res | Liquid restrictions | | | | | | | | | | |
| Categ | | | | | | ory 3 | | | | | | |
| Regulation | | Item Description | | | | | | Con | nments | | | |
| 511 | Implemen | Implementation of hazardous/unauthorized waste exclusi | | | | | | | | | | |
| 512(a)(c) | Satisfacto | Satisfactory daily/alternative cover | | | | | | | | | | |
| 512(b) | Satisfacto | Satisfactory intermediate cover | | | | | | | | | | |
| 515(b), 510(f)(4 | Open bur | Open burning prohibited | | | | | | | | | | |
| 518 | Cause dise | Cause discharge/leachate discharge leaving landfill | | | | | | | | | | |
| 510(f)(3), 518(a)(4) | Depositing | Depositing waste in standing water prohibited | | | | | | | | | | |
| 510(n) | Erosion o | Erosion or other cover defects resulting in exposed refuse | | | | | | | | | | |
| 309(c) | Overfill/o | ff lined area | | | | | | | | | | |
| | Regulation 22 - Records | | | | | | | | | | | |
| 520(a)(8), 204(b) Date of last groundwater monitoring rep | | ng report | June 25, 2019 | | | Site Condit | | Dry | | | | |
| 522 | | ngineering report | Y/ DY | June 2018 | | onstruction Yes/No | | ther Conditions Sunny Third part CQA on-site during construction Yes/No | | | | |
| 528 | | ction in progress | Yes/No No | | Tiother of miles competences | | | Third part C | QA on-site during | construction | Yes/No | No |
| 511 514, 520(a)(3) | 511 Date of last random inspection for unauthorized waste 4, 520(a)(3) Date of last quarterly methane monitoring | | Every load None | Total # for month Detection level | | June 514 Explosive gas records current? Yes/No | | | | | | |
| , , , , | • | | None | | Disposal location | 514 Explosive gas records current? | | | | | | |
| | | 814.02, | | Tons | 2 nd QTR 2 | 2019 | | | | | | |
| 527 | | DMR records curre | ent? Yes/No Yes | | | - | | | | | | |
| Operator Name & Number Keith Swilling Lic: # 000420 | | | Signature of Inspector Addy Auty | | | | - | | | | | |
| Exit Interview Con | ducted with | Keith Swilling Lic: | 000420 | Method | On- | -site | Date | 7/8/2019 | | Time 09 | 950 | |