

Columbus Co 24-02

1997

1997

24021997

Decker

INTERNATIONAL  PAPER

RIEGELWOOD MILL
JOHN L. RIEGEL ROAD
RIEGELWOOD NC 28456

September 3, 1997

Mr. William L. Meyer, Director
North Carolina Division Of Solid Waste Management
P. O. Box 27687
Raleigh, North Carolina 27611-7687



**Subject: Delegation of Authority for Submission
of Data and Reports**

Certified Mail: P 327 125 702

Dear Mr. Meyer:

I, Louis Grissom, Mill Manager, am responsible for principle business function, perform policy and decision making for the Riegelwood Mill business site, and do hereby authorize the business site Environmental, Health and Safety Manager to certify and submit in the name and on behalf of International Paper all environmental reports, documentation, plans or other information related to the Riegelwood Mill required by federal, state, or local permit issuing authorities as allowed under appropriate regulations.

Thank you for your consideration in this matter. If you have any questions or need additional information, please don't hesitate to call me at (910) 655-6213 or W. A. Soders at (910) 655-6415.

Sincerely,

L. O. Grissom
Mill Manager

cc: Terry F. Dover
Isaiah Guyton

State of North Carolina
Department of Environment,
Health and Natural Resources
Division of Waste Management

James B. Hunt, Jr., Governor
Wayne McDevitt, Secretary
William L. Meyer, Director



August 15, 1997

Mr. Joe Zuncich, R.E.P.
Environmental Resources Group Leader
International Paper
P.O. Box 8
Riegelwood, N.C. 28456

RE: Meeting of August 13, 1997, and RUST E&I Memo of August 14,
for International Paper Industrial Landfill, Permit No.24-02

Dear Mr. Zuncich,

Thank you for the opportunity to meet with you and John Funk, of RUST E&I, this past Wednesday. I now have a greater appreciation for the conditions at the International Paper Landfill and the difficulty in demonstrating compliance with 15A NCAC 2L.

The Solid Waste Management Rules do not have provisions for a variance in complying with .0503(2)(d)(ii). If the landfill is to continue operating after January 1, 1998, then a groundwater protection demonstration must be made, according to (d)(ii)(A). This demonstration must not only show current compliance, but also demonstrate, based upon modeling, "a design that will ensure that the ground water standards established under 15A NCAC 2L *will not be exceeded* in the uppermost aquifer at the compliance boundary".

Because of the unusual location and design of the landfill on a peninsula surrounded by the waste water treatment basin (WWTB), it will be very difficult to make the required demonstration. Never the less, since the Solid Waste Management Rules require such a demonstration, this must be done in order for the landfill to continue to operate after January 1, 1998.

The existing detection monitoring system, which is located outside the WWTB, and beyond what would normally be the compliance boundary, currently indicates some constituents that exceed the 2L Groundwater Standards. Therefore it must be assumed that the landfill is not in compliance, unless it can be demonstrated that these exceedences are due to natural variability or a source other than the landfill (perhaps the WWTB).

Mr. Joe Zuncich
International Paper Landfill
2L Compliance Demonstration
Page 2

I do not see any way to attempt demonstrating compliance without establishing ground-water monitoring wells on the peninsula between the waste boundary and the WWTB. (If necessary, these wells would have to be placed through wastes.) Extreme care would have to be taken to locate, design, and install these wells in such a manner so as not to spread potential contamination. Wells and piezometers would need to be located and designed so as to demonstrate the direction and rate of ground-water flow and provide representative water quality samples. At least one well nest would be necessary to determine the different hydraulic characteristics of the upper sand aquifer and the Pee Dee formation aquifer, to establish vertical gradients, and to determine existing water quality.

It appears to me this information is necessary before modeling can be done to attempt to demonstrate compliance with 2L. Even then, because of the technical difficulties involved, especially the difficulty of distinguishing between potential contaminants from the landfill and potential contaminants from the WWTB, it is questionable if compliance can be successfully demonstrated.

As stated in the December 6, 1996, letter to you from Jim Coffey, Supervisor of the Solid Waste Section Permitting Branch, the owner/operator shall submit the information necessary to complete the final determination of compliance with Rule .0503(2)(d)(ii) to the Section thirty (30) days prior to January 1, 1998. It may take some time for the Solid Waste Section to evaluate these submittals and make a final determination of compliance. However, as also stated in the 12-06-96 letter, the construction and operational plan shall be developed in one-year phases and operated in such a manner that the landfill may be closed at any time.

If a successful demonstration of compliance can be provided, there is the possibility that the landfill can continue to operate for an additional five years. However, if a successful demonstration can not be made, the landfill will have to cease operations and close in less than five years. It appears that International Paper should pursue other disposal options as soon as possible. If another landfill is to be permitted, every effort should be made to proceed with the permit application process as quickly as possible.

Mr. Joe Zuncich
International Paper Landfill
2L Compliance Demonstration
Page 3

As we discussed, low permeability caps are generally required and sludge-soil mixtures are typically allowed only in the vegetative layer of the cap system. For additional information on final cover considerations and cap construction, you may wish to talk with one of our permitting engineers.

If you or your consultant have any questions about this letter, please call me at (919) 733-0692, extension 258.

Sincerely,

Bobby Lutfy

Bobby Lutfy
Hydrogeologist
Solid Waste Section

cc: Jim Coffey, Solid Waste Section
Susan Leistiko, Solid Waste Section
Ikie Guyton, SWS - Fayetteville
John Funk, RUST Environment & Infrastructure