



NORTH CAROLINA DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor  
William G. Ross Jr., Secretary

March 20, 2007

Edward J. Kreul  
Manager, Environmental Performance  
International Paper, Riegelwood Mill  
865 John L. Riegel Road  
Reigelwood, NC 28456

Re: Conditional Authorization for One-Time Disposal of Petroleum Contaminated Soil  
International Paper Riegelwood Mill Industrial Landfill  
Columbus County, North Carolina  
Permit No. 2402  
Doc ID No. RCO1097

Dear Mr. Kreul:

In response to your attached request (RCO1096), you are hereby authorized to dispose of petroleum contaminated soil under the following conditions:

1. This authorization specifically allows the disposal of the petroleum contaminated soil materials that originate in the areas identified and described in the attached information submitted by you (Doc. Id. No. RCO1096), and does not grant or imply any additional operational or disposal authorization.
2. The quantity of PCS will be limited to only the material excavated as delineated on the attached schematic (RCO1096).
3. PCS material must be stored only on lined areas of the landfill that drain into the leachate collection system.
4. This authorization does not relieve you of any responsibilities or obligations for meeting the conditions of your permit or any State or Federal rule concerning the operation or management of the above referenced facility.

Your cooperation in this matter is appreciated. Should you have any questions regarding this letter or wish to discuss the matter further, please contact me at (919) 508-8498 or Dennis Shackelford, your regional Solid Waste Management Specialist in Fayetteville, at (910) 433-3349.

Sincerely,

Geoffrey H. Little  
Environmental Engineer  
Solid Waste Section

c: Paul Crissman, DWM  
Ed Mussler, DWM  
Dennis Shackelford, DWM

Enclosures



RIEGELWOOD MILL  
865 JOHN L. RIEGEL ROAD  
RIEGELWOOD, NC 28456  
910-655-2211

March 6, 2007

Mr. Geoffrey Little  
NC Division of Waste Management  
1646 Mail Service Center  
Raleigh, NC 27699-1646

Dear Mr. Little:

As we discussed yesterday, petroleum contaminated soil (PCS) was discovered in the course of concrete removal and excavation for new equipment installation in our pulp dryer building. The petroleum components are primarily in the oil and grease range with some in the diesel range.

We would like to dispose of this material in our on-site landfill. Handling and disposal will be performed as follows:

1. Whenever possible, material will be excavated directly into dump trucks and hauled to the landfill.
2. When soil cannot be hauled directly to the landfill, it will be stockpiled on plastic over pavement in areas that drain to our process sewers ahead of waste water treatment. Those stockpiles will then either be hauled to the landfill if they are unsuitable for construction or sampled in accordance with the DWQ groundwater Section "Guidelines for Investigation of Soil and Groundwater". If sampling shows concentrations of O&G and DRO to be below action levels, 250 mg/kg and 40 mg/kg respectively, we will use that material for construction.
3. At the landfill, PCS will be placed in the southeast quadrant of cell 1 upon "in place" waste with a minimum liner separation of five feet. Trucks will be provided stable access to a deposit point well within the liner limits to ensure containment.
4. Our standard waste placement sheets will be used to document placement of the PCS.

Enclosed are a diagram of the construction excavation and a listing of the soil analysis results for the 30 in situ samples collected. We propose to use the insitu data as characterization for any material hauled directly to our on-site landfill.

Please contact me at your earliest convenience with any questions or concerns. Both of my phone numbers appear below. Your help in this matter will be much appreciated.

Yours truly,

A handwritten signature in black ink, appearing to read "Edward J. Kreul".

Edward J. Kreul  
Manager – Environmental Performance

Office: (910) 362-4883  
Mobile: (910) 612-2504

Enclosures

Sample Depth	Date	Diesel Range Organics (semivolatiles)	Oil & Grease (heavier organics)
A=2 1/2' B=5'		DRO (std 40)	O&G (std 250)
00A	2/8/2007	<b>308</b>	<b>524</b>
00B	2/8/2007	35.9	135
2A	2/8/2007	<b>91.2</b>	<b>1720</b>
2B	2/8/2007	21.9	<b>358</b>
3A	2/8/2007	27.2	<b>440</b>
3B	2/8/2007	<b>2140</b>	<b>29700</b>
6A	2/8/2007	<b>63.2</b>	<b>437</b>
6B	2/8/2007	<b>960</b>	<b>6100</b>
9A	2/8/2007	21.1	228
9B	2/8/2007	16.2	<b>324</b>
12A	2/8/2007	21.5	<b>516</b>
12B	2/8/2007	6.67	<b>593</b>
13A	2/14/07	9.23	53
13B	2/14/2007	21.3	67.2
14A	2/8/2007	<6.47	<31.9
14B	2/8/2007	<6.55	36.7
15A	2/8/2007	9.29	147
15B	2/8/2007	<b>98.4</b>	<b>1060</b>
18A	2/8/2007	11.5	157
18B	2/8/2007	13.5	98.6
22A	2/8/2007	37.6	102
22B	2/8/2007	<7.23	83.1
24A	2/8/2007	<b>42.7</b>	<b>301</b>
24B	2/8/2007	9.99	226
27A	2/14/07	32.7	79.4
27B	2/14/2007	7.34	77.7
35A	2/14/07	13.9	<b>269</b>
35B	2/14/2007	<6.90	91.2
39A	2/14/07	20.2	49.7
39B	2/14/2007	9.85	92.2

