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

September 4, 2008

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

Re: Permit to Construct Cell 1 Extension
International Paper Industrial Landfill
Columbus County, North Carolina
Permit No. 24-02
Doc ID No. DIN 5757

Dear Mr. Kruel:

Enclosed is a Permit to Construct the above referenced industrial solid waste landfill facility at the International Paper Riegelwood Mill in Riegelwood, NC. Please note that according to 15A NCAC 13B .0203(d), by beginning construction and receiving waste in the cells, the applicant shall be considered to have accepted the conditions of the permit. Therefore, please review the permit carefully, and contact us if you have any questions regarding the permit.

Disposal operations may continue at the facility under the conditions of the existing Permit to Operate. In general, the new facility permit does not repeat conditions that are contained in the Solid Waste Management Rules, 15A NCAC 13B, nor are specific conditions restated that are included in the approved plans such as site specific operations or groundwater monitoring plans. However, compliance with the approved plans and documents is enforceable under the conditions of the permit.

Thank your for your efforts and cooperation in this matter. If you have questions about the permit conditions or questions arise during construction, please contact either me at (919) 508-8498 or Wes Hare, Waste Management Specialist for the facility, at (910) 796-7405.

Sincerely,

Geoffrey H. Little
NC-DENR Division of Waste Management Solid Waste Section
2008.09.04 14:29:56 -04'00'

Geoffrey H. Little
Permit Engineer

c: Paul Crissman, DWM
Ed Mussler, DWM
Ellen Lorscheider, DWM
Wes Hare, DWM
Greg Mills, RSG Engineers

Enclosure

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STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT
SOLID WASTE SECTION

INDUSTRIAL LANDFILL
PERMIT NO. 24-02

INTERNATIONAL PAPER
is hereby issued a

PERMIT TO CONSTRUCT
INTERNATIONAL PAPER **INDUSTRIAL LANDFILL**
CELL 1 EXTENSION

located off John L. Riegel Road, Columbus County, North Carolina, in accordance with Article 9, Chapter 130A, of the General Statutes of North Carolina and all rules promulgated thereunder and subject to the conditions set forth in this permit. The facility is located and described by the legal description of the site or the property map contained within the approved application.

Edward F. Mussler III, P.E.
cn=Edward F. Mussler III, P.E., c=US, o=Division of Waste Management, ou=Solid Waste Section, email=ed.mussler@ncmail.net
I have reviewed this document and am approving this document
2008.09.03 14:12:54 -04'00'

Edward F. Mussler, III, P.E.,
Permitting Branch Supervisor
Permitting Branch

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ATTACHMENT 1

PART I: Permitting History

Issuance	Date
Permit to Construct Cell 1	December 30, 2002
Permit to Operate Cell 1	February 17, 2005
Permit to Construct Cell 1 Extension Amendment	September 3, 2008

PART II: List of Documents for the Approved Plan

Industrial Landfill Lateral Expansion Permit Application, International Paper, Riegelwood, North Carolina. (Permit Number 24-02). Prepared for: International Paper, Riegelwood, NC. Prepared by: G.N. Richardson & Associates, Inc. Raleigh, NC. February 2002.

Drawings entitled: *International Paper. Columbus County, North Carolina. Industrial Landfill Permit Application.* February 2002. 27 Sheets.

Construction Quality Assurance Report, International Paper-Riegelwood Mill, Industrial Landfill, Cell 1 Construction. Permit Number 24-04. Prepared for: International Paper- Riegelwood Mill, 805 John L. Riegelwood Road, Riegelwood, North Carolina 28456. Prepared by: G.N. Richardson & Associates, Inc. Raleigh, NC. December 2003.

Operations Manual. International Paper- Industrial Landfill Facility, Permit #24-02. Riegelwood, North Carolina. Prepared by: International Paper, Engineering Technology. February 2005.

Permit Modification for Cell 1 Extension. Prepared by: Richardson Smith Gardner & Associates, Raleigh, NC. July 13, 2007, revised August 12, 2008. [DIN5406]

PART III: GENERAL PERMIT CONDITIONS

1. Pursuant to the NC Solid Waste Management Rules (Rule) 15A NCAC 13B .0504 and .0201(b) and (e), this permit approves construction of the Cell 1 extension for the International Paper Industrial Landfill (ILF).

    a. This Permit to Construct is valid for 18 months from the date of issuance of this permit. If substantial construction does not begin within 18 months from the issuance date of this permit, then the Permittee must obtain a permit modification from the Solid Waste Section prior to construction and comply with the conditions of the approval. An industrial landfill permit modification fee will be required.

    b. The Permittee must submit an application to the North Carolina Department of Environment and Natural Resources, Division of Waste Management, Solid Waste Section (Section) for the Permit to Operate amendment, which is necessary for the next 5-year phase of operation.

c. The application for subsequent phases of construction or operation must comply with the rules and regulations in effect at the time of the next application.

2. The person or persons to whom this permit is issued ("Permittee") are the owners and operators inclusively of the solid waste management facility.

3. [Intentionally Blank]

4. When this property is sold, leased, conveyed, or transferred in any manner, the deed or other instrument of transfer must contain in the description section in no smaller type than that used in the body of the deed or instrument, a statement that the property has been used as a Industrial Landfill (ILF) and a reference by book and page to the recordation of the permit.

5. By receiving waste at this facility, the Permittee shall be considered to have accepted the terms and conditions of this permit.

6. Construction and operation of this solid waste management facility must be in accordance with the Solid Waste Management Rules, 15A NCAC 13B; Article 9 of the Chapter 130A of the North Carolina General Statutes (NCGS 130A-290, et seq.); the conditions contained in this permit; and the approved plan. Should the approved plan and the rules conflict, the Solid Waste Management Rules shall take precedence unless specifically addressed by permit condition.

7. This permit is issued based on the documents submitted in support of the application for permitting the facility including those identified in Attachment 1, Part II "List of Documents for Approved Plan," which constitutes the approved plan for the facility. Where discrepancies exist, the most recent submittals and the Conditions of Permit shall govern.

8. This permit may be transferred only with the approval of the Solid Waste Section through the issuance of a new or substantially amended permit in accordance with applicable statutes and rules. In accordance with NCGS 130A-295.2(g), the Permittee must notify the Solid Waste Section thirty (30) days prior to any significant change in the identity or business structure of either the owner or the operator including but not limited to a proposed transfer of ownership of the facility or a change in the parent company of the owner or operator of the facility.

9. The Permittee is responsible for obtaining all permits and approvals necessary for the development of this project including approval from appropriate agencies for a General or Individual NPDES Stormwater Discharge Permit. Issuance of this permit does not remove the Permittee's responsibilities for compliance with any other local, state or federal rule, regulation or statute.

- End of Section -

ATTACHMENT 2
CONDITIONS OF PERMIT

PART I: SITE SPECIFIC CONDITIONS

1. This permit authorizes the construction of an extension of Cell 1 at the Industrial Landfill increasing the total design gross capacity by construction, of 147,000 cubic yards in Cell 1 and 52,000 cubic yards in Cell 2. The construction will also increase the footprint of the lined disposal area to 29.75 acres. However, the 2.25-acre increase is over the delineated footprint of the closed landfill, so the increased footprint of the lined landfill does not occur in undeveloped area. Portions of the existing approved Cell 1 are currently located within the delineated footprint of the closed unlined landfill.

   a. The bottom of the lined extension area represents an improved closure of the closed unlined area.
   b. Gross capacity is the measured volume between the bottom of waste and the top of final cover.
   c. Areas identified as future cells are approved for future development, but the Permittee must submit an application for a Permit to Construct in compliance with applicable rules and statutes before commencement of construction in those areas.
   d. The landfill approved for development in accordance with the approved plan, Attachment 1, Part II, is summarized below:

Area	Gross Capacity cu yds	Acres
Cell 1	749,000	13.80
Cell 1 Extension	147,000	2.25
Future Cells	1,870,000	13.70
Totals	2,766,000	29.75

2. The facility includes a closed unlined industrial solid waste unit of unknown volume. The lined industrial disposal unit Cell 1 is located adjacent to the unlined unit. Construction activities are not permitted to alter the integrity of the closure of the unlined landfill. Damage to the closed unlined landfill must be documented, repaired as soon as practicable and certified by a registered engineer that repairs are consistent with the closure plan submitted for the unlined landfill.

3. This facility is permitted to receive industrial waste from the International Paper Riegelwood Pulp and Paper Mill located adjacent to the landfill, including asbestos, consistent with the approved plans and other nonhazardous solid wastes if specifically approved by the Section. Waste acceptance requirements may be affected by future revisions and amendments to the NC General Statutes or to the NC Solid Waste Management Rules.

4. An Action Leakage Rate (ALR) is approved for the secondary leachate collection system of 500 gallons per acre day. If that rate is exceeded for any length of time, the Permittee must

implement the Response Actions contained in the approved facility Operations Manual. In addition, the Permittee must notify the Section in writing within 7 calendar days of exceeding the ALR. Within 30 calendar days of exceeding the ALR, the Permittee must present a plan for identifying the cause, proposed remedy and repair schedule.

5. The conditions of the Permit to Operate Cell 1 remain in effect for the operation of Cell 1 during the construction of the Cell 1 extension. Waste is not approved for disposal in the Cell 1 extension area under this Permit to Construct. Waste may only be placed in the Cell 1 extension area if the Permittee submits an application for Permit to Operate the Cell 1 extension in compliance with the N.C. Solid Waste rules and regulations and is approved by the Section.

6. The following conditions must be met prior to operation of the Cell 1 extension:

   a. The Permittee must arrange for a site inspection and pre-operative meeting conducted by a representative of the Solid Waste Section.
   b. Construction Quality Assurance (CQA) documentation as well as a certification by the project engineer that the landfill was built in accordance with approved plans and the conditions of the permit must be submitted to the Section for review and approval.
   c. The Permittee must obtain a Permit to Operate the Cell 1 Extension from the Section.

7. Revisions to the design or operation of the facility without the written approval of the Solid Waste Section are a violation of this permit.

8. Amendments or revisions to the NC Solid Waste Management Rules or any violation of groundwater standards may necessitate modification of the approved plans or closure of the facility.

9. Open burning of solid waste is prohibited. If a fire occurs, the Permittee must provide oral notification to the Section within 24 hours of the occurrence followed by a written report of the details of the fire within 10 working days of the occurrence that includes but not limited to: the cause, the location(s) on the premises, the dimensions and volume of material involved, description of the emergency response activities, how the fire was brought under control, and what mitigation measures are implemented to reduce or eliminate conditions leading to the fire. Other conditions may be required based on the severity or nature of the fire.

EROSION AND SEDIMENTATION CONTROL REQUIREMENTS

10. All required sedimentation and erosion control measures must be installed and operable to mitigate excessive on-site erosion and to prevent silt from leaving the site of the landfill unit during the service life of the facility.

11. The Permittee is solely responsible for maintaining an approved sedimentation and erosion control plan. All earth disturbing activities must be conducted in accordance with the

Sedimentation Pollution Control Act of 1973 (15 NCAC 4) and consistent with any other local, state or federal requirements.

12. Facility construction, operations or practices must not cause or result in a discharge of pollution, dredged material, and/or fill material into waters of the state in violation of the requirements under Sections 402 and 404 of the Clean Water Act, as amended

13. Surface water must be diverted from the operational area and must not be impounded over or in waste. Solid waste must not be disposed in standing water.

- End of Permit Conditions -

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