

**Little, Geof**

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**From:** Little, Geof  
**Sent:** Thursday, September 17, 2009 11:35 AM  
**To:** 'Edward J Kreul'  
**Cc:** Mussler, Ed; Lorscheider, Ellen; gregm@rsgengineers.com; Crissman, Paul; Hare, Wes; William H Roy; Rich\_Lowe@URSCorp.com; mmccarthy@saiia.com  
**Subject:** RE: Cover Letter and Permit to Operate Cell 1 Extension

Hi Ed,

NC General Statute 130A-309.09D(b) [see link below] requires private solid waste management facilities to report to the Department the amount by weight of the solid waste received and disposed in a landfill. However, neither the statutes nor Solid Waste Management rules require industrial facilities to use scales to weigh all disposed solid waste.

An administrative modification will be made to your permit [DIN 7996] striking references relating to the use of scales in items 17 and 18.d. of Attachment 3.

Converting the weight of sludge and solid waste materials disposed in the landfill using density factors (weight/cubic yard) based on sample scale weights will satisfy the reporting requirements in the permit and statute.

Link to NCGS 130A:

[http://www.ncleg.net/EnactedLegislation/Statutes/HTML/ByChapter/Chapter\\_130A.html](http://www.ncleg.net/EnactedLegislation/Statutes/HTML/ByChapter/Chapter_130A.html)

Geof

Geoffrey H. Little  
Solid Waste Section  
NC-DENR Division of Waste Management  
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1646 Mail Service Center  
Raleigh, North Carolina 27699-1646

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-----Original Message-----

From: Edward J Kreul [mailto:[Edward.Kreul1@ipaper.com](mailto:Edward.Kreul1@ipaper.com)]  
Sent: Wednesday, September 16, 2009 4:28 PM  
To: Little, Geof  
Cc: Mussler, Ed; Lorscheider, Ellen; gregm@rsgengineers.com; Crissman, Paul; Hare, Wes; William H Roy; Rich\_Lowe@URSCorp.com; mmccarthy@saiia.com  
Subject: Re: Cover Letter and Permit to Operate Cell 1 Extension

Geof,

Condition 17 of this permit requires waste quantities to the landfill be determined by scale. As you and I discussed this morning, this IP location does not have landfill scales so we rely on truckload counts coupled with occasional density testing of the various waste streams and a sampling of truck weights to track amounts reaching the landfill. The relative consistency of our waste streams and hauling equipment coupled with annual measurement of in-place volume as required in Condition 18 should provide ample indication of landfill space occupied and available. Based on our discussion I believe you agree but I will appreciate confirmation.

If you have any questions or would like any additional information, just contact me.

Thanks,

Ed Kreul  
Manager - Environmental Performance  
International Paper - Riegelwood Mill  
Office: (910) 362-4883  
Mobile: (910) 362-4883

"Little, Geof"  
<geof.little@ncdenr.gov>

09/15/2009 04:43  
PM

"Edward J. Kruehl"  
<Edward.Kreull@ipaper.com>

"Greg Mills (gregm@gnra.com)"  
<gregm@gnra.com>, "Mussler, Ed"  
<ed.mussler@ncdenr.gov>, "Crissman,  
Paul" <paul.crissman@ncdenr.gov>,  
"Lorscheider, Ellen"  
<ellen.lorscheider@ncdenr.gov>,  
"Hare, Wes" <wes.hare@ncdenr.gov>

To

cc

Subject

Cover Letter and Permit to Operate  
Cell 1 Extension

Attached are electronic copies of the above referenced documents. Paper copies will be mailed to you.

8597.pdf: Cover Letter  
7996.pdf: Permit to Operate

Persons listed as copy recipients or having some interest in the attached document will not receive paper copies of the document. The attached .pdf file are the only copies they will receive.

Please let me know should you have trouble opening the file or questions regarding the attachment.

Thanks,

Geof

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(See attached file: 8597.pdf)(See attached file: 7996.pdf)