

## Little, Geof

---

**From:** Lenore\_Gaier@URSCorp.com  
**Sent:** Friday, January 29, 2010 11:02 AM  
**To:** Geof.Little@ncmail.net  
**Cc:** edward.kreul1@ipaper.com; Rich\_Lowe@URSCorp.com  
**Subject:** IP-Riegelwood Cell 2 Liner Submittal  
**Attachments:** Approval of RAR-EPA Approval for the remediation work.pdf; LQS Lertter Of Approval Cell-2.pdf

Geoffrey,

On January 13, 2010 Rich Lowe and I meet with you to go over the IP-Riegelwood Liner System submittal. During our meeting we were going over all the regulatory approvals that have been granted for this site. URS mentioned that Appendix A in the report includes a copy of these approvals. When going over them we noticed that two approval were missing. The EPA approval for the remediation work in Cell 2 and the Erosion & Sediment Control Plan approval for Cell 2 were not in the report. You mentioned having a copy of these approval would be very helpful. I have obtain a copy of these approvals and attached them to this email.

Did you have time to determine if IP-Riegelwood has any outstanding permitting fees due? I know I wasn't suppose to bother you for other week or two but out of curiosity did you have time to look over the liner submittal?

*(See attached file: Approval of RAR-EPA Approval for the remediation work.pdf)(See attached file: LQS Lertter Of Approval Cell-2.pdf)*

Please do not hesitate to contact me if you have any questions or concerns.

Thank you,

Lenore Gaier  
URS Corporation - North Carolina  
1600 Perimeter Park Drive, Suite 400  
Morrisville, NC 27560  
Tel: 919.461.1100  
Direct: 919.461.1267  
Fax: 919.461.1415  
[lenore\\_gaier@urscorp.com](mailto:lenore_gaier@urscorp.com)

This e-mail and any attachments contain URS Corporation confidential information that may be proprietary or privileged. If you receive this message in error or are not the intended recipient, you should not retain, distribute, disclose or use any of this information and you should destroy the e-mail and any attachments or copies.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

REGION 4

ATLANTA FEDERAL CENTER  
61 FORSYTH STREET, SW  
ATLANTA, GEORGIA 30303-8960

December 14, 2009

Mr. Prashant Gupta  
Honeywell International Inc.  
Building 1-1-21  
4101 Bermuda Hundred Road  
Chester, VA 23836

SUBJECT: Approval of Removal Action Report for International Paper Company Cell No. 2  
LCP-HoltraChem Site

Dear Mr. Gupta:

The purpose of this letter is to notify you of EPA's approval of the revised Removal Action Report for International Paper Company Cell No. 2. The revisions submitted by CH2M Hill earlier this month, satisfied the comments made by EPA and the North Carolina Department of Environment and Natural Resources (NCDENR).

Please proceed with updating the Post Removal Site Control Plan for the HoltraChem Site to address changes at the HoltraChem Site as a result of the removal action at International Paper Company Cell No. 2. If you have any questions, feel free to contact me at either (404) 562-8760 or via e-mail at [URQUHART-FOSTER.SAMANTHA@EPA.GOV](mailto:URQUHART-FOSTER.SAMANTHA@EPA.GOV).

Sincerely,

A handwritten signature in black ink, appearing to read "Samantha Urquhart-Foster".

Samantha Urquhart-Foster  
Remedial Project Manager  
Superfund Remedial and Site Evaluation Branch

cc: Edward Kreul, IP  
Roger Schumer, IP  
David Mattison, NCDENR  
Denis Ewing, CH2M Hill  
Keri Hallberg, CH2M Hill  
Walker Jones, MACTEC



Letter of Approval with Modifications and Performance Reservations  
Project :- International Paper Industrial Landfill, Cell-2, #24-02  
September 21, 2009  
Page 2 of 3

Acceptance and approval of this plan is conditioned upon your compliance with Federal and State water quality laws, regulations, and rules. In addition, local city or county ordinances or rules may also apply to this land-disturbing activity. This approval does not supersede any other permit or approval.

Please be aware that your project will be covered by the enclosed NPDES General Stormwater Permit NCG010000 (Construction Activities). You should first become familiar with all of the requirements for compliance with the enclosed general permit.

Please note that this approval is based in part on the accuracy of the information provided in the Financial Responsibility Form, which you have provided. You are requested to file an amended form if there is any change in the information included on the form. In addition, it would be helpful if you notify this office of the proposed starting date for this project. Please notify us if you plan to have a preconstruction conference.

Your cooperation is appreciated.

Sincerely,



Daniel Sams, PE  
Regional Engineer  
Land Quality Section

Enclosures: Certificate of Approval  
Modifications and Performance Reservations  
NPDES Permit

cc: Dennis Hoyle, PE, URS Corporation - North Carolina

## MODIFICATIONS AND PERFORMANCE RESERVATIONS

Project Name: International Paper Industrial Landfill, Cell-2, #24-02  
Project ID: COLUM-2010-002  
County: Columbus

1. This plan approval shall expire on December 31, 2013, if no land disturbing activity has been undertaken, as is required by Title 15A NCAC 4B.0029.
2. The developer is responsible for the control of sediment on-site. If the approved erosion and sedimentation control measures prove insufficient, the developer must take those additional steps necessary to stop sediment from leaving this site. Each sediment storage device must be inspected after each storm event. Maintenance and/or clean out is necessary anytime the device is at 50% capacity.
3. Any and all existing ditches on this project site are assumed to be left undisturbed by the proposed development unless otherwise noted. The removal of vegetation within any existing ditch or channel is prohibited unless the ditch or channel is to be regarded with side slopes of 2 horizontal to 1 vertical or less steep. Bank slopes may be mowed, but stripping of vegetation is considered new earth work and is subject to the same erosion control requirements as new ditches.
4. The developer is responsible for obtaining any and all permits and approvals necessary for the development of this project prior to the commencement of this land disturbing activity. This could include agencies such as the Division of Water Quality's stormwater regulations, their enforcement requirements within Section 401 of the Clean Water Act, the U.S. Army Corps of Engineers' jurisdiction of Section 404 of the Clean Water Act, the Division of Coastal Management's CAMA requirements, the Division of Solid Waste Management's landfill regulations, the Environmental Protection Agency and/or The U.S. Army Corps of Engineers jurisdiction of the Clean Water Act, local County or Municipalities' ordinances, or others that may be required. This approval cannot supersede any other permit or approval; however, in the case of a Cease and Desist Order from the Corps of Engineers, that Order would only apply to wetland areas. All high ground would still have to be in compliance with the N.C. Sedimentation Pollution Control Act.
5. If any area on site falls within the jurisdiction of Section 401 or 404 of the Clean Water Act, the developer is responsible for compliance with the requirements of the Division of Water Quality, the Corps of Engineers and the Environmental Protection Agency (EPA) respectively. Any erosion control measures that fall within jurisdictional wetland areas must be approved by the aforementioned agencies prior to installation. The Land Quality Section must be notified of a relocation of the measures in question to the transition point between the wetlands and the uplands to assure that the migration of sediment will not occur. If that relocation presents a problem or contradicts any requirements of either DWQ, the Corps, or the EPA, it is the responsibility of the developer to inform the Land Quality Section regional office so that an adequate contingency plan can be made to assure sufficient erosion control remains on site.
6. Any borrow material brought onto this site must be from a legally operated mine or other approved source. Any soil waste that leaves this site can be transported to a permitted mine or separately permitted construction sites without additional permits. Disposal at any other location would have to be included as a permit revision for this approval.
7. This permit allows for a land disturbance, as called for on the application plan, not to exceed 16.7 acres. Exceeding that acreage will be a violation of this permit and would require a revised plan and additional application fee. Any addition in impervious surface, over that already noted on the approved plan, would also require a revised plan to verify the appropriateness of the erosion control measures and stormwater retention measures.
8. The construction detail for the proposed silt fence requires reinforcing wire and **steel** posts a maximum of eight (8) feet apart. Omission of the reinforcing wire is a construction change that necessitates more posts for support, i.e., the spacing distance needs to be reduced to no greater than six (6) feet apart.
9. Because the sediment traps and basins are shown on the plan as the primary sedimentation and erosion control devices on this project, it is necessary that the traps and basins and their collection systems be installed before any other grading takes place on site. If that proves to be impractical, a revised plan must be submitted and approved that addresses erosion and sediment control needs during the interim period until the traps and basins are fully functioning.
10. A graveled construction entrance must be located at each point of access and egress available to construction vehicles during the grading and construction phases of this project. Access and egress from the project site at a point without a graveled entrance will be considered a violation of this approval. Routine maintenance of the entrances is critical.
11. The North Carolina Sedimentation Pollution Control Act mandates a short time frame in which to re-establish vegetative groundcover. Slopes (including cuts, fills, and ditch banks) left exposed will, within 21 calendar days after completion of any phase of grading, be planted or otherwise provided with groundcover sufficient to permanently restrain erosion.