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Mr. Allen Gaither
NCDENR
2090 U.S. Highway 70
Swannanoa, NC 28778

Subject: Engineering Technical Review – Permit to Construct
Blue Ridge Paper Products, Inc. – Landfill No. 6D-South
Haywood County, Permit #44-06
Response to October 19, 2009 Review Comments

Dear Mr. Gaither:

On behalf of Blue Ridge Paper Products, Sevee & Maher Engineers, Inc. (SME) has prepared a set of responses to the review comments provided by Mr. Allen Gaither of NCDENR on the Landfill No. 6D-South design. The comments were in Mr. Gaither's letter dated October 19, 2009 - Request for Additional Information. For ease of review, we have provided the comment along with our response.

SUB-DRAINAGE FEATURES

1. Will replacing sand with #57 stone in the toe drain affect the stability of the southern dike? If so, has the stability with the #57 been modeled?

SME's Response. The replacement of sand with #57 stone as shown on Drawings C-103A, C-300, and C-303, dated October 9, 2009, will not affect the stability and, in fact, the stability would likely increase. The #57 stone will provide greater drainage capacity that is desirable in this situation. It also provides greater strength than sand and, consequently, would not reduce stability of the southern dike.

2. Will replacing sand with #57 stone in the drainage blanket affect the stability of the southern dike? If so, has the stability with the #57 been modeled?

SME's Response. The replacement of sand with #57 stone as shown on Drawings C-103A, C-300, and C-303, dated October 9, 2009, will not affect the stability and, in fact, the stability would likely increase. The #57 stone will provide greater drainage capacity that is desirable in this situation. It also provides greater strength than sand and, consequently, would not reduce stability of the southern dike.

NORTH CONTAINMENT BERM SUB-DRAINAGE FEATURES

3. **Given the primary liner runs under the leachate lines in tie-in saddles is the NCB now a permanent feature of the landfill base grades?**

SME's Response. The southern containment berm as shown on Drawings C-103A and C-301, dated October 9, 2009, is now a permanent feature of this modification. The change will simplify the liner deployment and berm construction and maintain system performance. There will be no penetrations in the primary geomembrane with these modifications.

4. **If so, there will effectively be a dam five feet in height between Area D-South and future Area D-North. Is there any concern for water or leachate to "pond" on the North side of the NCB and 60-mil operational containment geomembrane? If so, what plans are in place to manage this concern?**

SME's Response. The Department is correct that there will effectively be a five-foot high dam between Area D-South and the future Area D-North. However, water will not be allowed to pool behind the berm through proper grading and installation of leachate collection laterals on the north side. The base grading for the north side will be sloped to drain to the two trunk lines that are extended from the south side. Currently, the stormwater management on the north side is directed in much the same way, sloping toward the trunk lines, as shown on Drawing C-103A with flow directed to a sedimentation pond that coincides with the location of the easterly truck line alignment.

5. **Is there a plan to tie the two leachate collection trunks together on the North side of the NCB to ensure leachate flow from future Area D-North can reach the sump in Area D-South?**

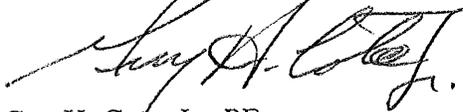
SME's Response. Yes, the trunk lines for the leachate collection system will be extended from the south side through the notches in the north containment berm as shown on Drawing C-301. The trunk lines will serve as the leachate collection headers for the north side and will allow leachate to reach the sump in Area D-South.

The drawings for this modification request consist of Drawings C-103A, C-104, C-300, C-301, C-302, and C-303, dated October 9, 2009. The drawings are stamped by a Professional Engineer licensed in North Carolina, John E. Sevee, #20589, and hereby certify that they meet the requirements for Sanitary Landfills.

This completes our response to the Section's review comments on Landfill No. 6D-South. Should you have any additional questions, please feel free to contact us.

Sincerely,

SEVEE & MAHER ENGINEERS, INC.

A handwritten signature in black ink, appearing to read "Guy H. Cote, Jr.", written over a light blue horizontal line.

Guy H. Cote, Jr., PE
Chief Engineer

Attachments

cc: J. Giaque