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Blue Ridge Paper Products Inc. - Canton Mill / Waynesville Plant

SOLID WASTE SECTION
ASHEVILLE REGIONAL OFFICE

2 September 2010

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7007 3020 0001 6119 8100

Mr. Allen Gaither
Environmental Engineer
Division of Waste Management
North Carolina Department of Environment
and Natural Resources
2090 U.S. Highway 70
Swannanoa, North Carolina 28778

Fac/Perm/Co ID #	Date	Doc ID#
44-06	9/3/10	11527

Subject: Closure and Post Closure Financial Estimate
Canton Mill Landfill No. 6
Permit No. 44-06

Dear Mr. Gaither:

Enclosed are the closure and post-closure financial estimates requested in your letter of 3 Aug 2010 received on 6 Aug 2010 by the Canton Mill. Sevee & Maher, our landfill design engineer, prepared the estimates using recent bid information and our cost experience with landfill site maintenance, leachate collection and groundwater monitoring. The closure estimate includes caps for the current active Cell 6A-West and Valley Fill and for the newly constructed Cell 6D-South. The closure cap estimate for Cell 6A-West assumes soil and gravel in accordance with the February 2002 and March 2008 approved operating plans and is the same as the closure cap successfully applied to Cell 6A-East that was closed in 2003. The closure cap estimate for Cell 6D-South includes a geomembrane in anticipation of future requirements. The post-closure estimate is for the entire permitted Landfill 6 site and includes 30-years of site maintenance, leachate collection and treatment, and groundwater monitoring.

The estimated total in 2010 dollars of closure, post-closure and the statutory corrective action reserve is \$9,245,000. Upon Division review and acceptance of the closure and post-closure estimates, Evergreen Packaging will establish a financial assurance mechanism in accordance with 15A NCAC 13B .1628(e). We understand that establishing financial assurance will be a condition of the operating permit for landfill Cell 6D-South but will not affect the Division's ability to issue the operating permit for the new cell. To avoid a disruption to landfill operations the operating permit for landfill Cell 6D-South is needed in early October 2010. The engineer's certification of completion for the Cell 6D-South leachate pump station was submitted on 20 Aug 2010 and was the last prerequisite for Division operating approval.

Blue Ridge Paper Products Inc. dba Evergreen Packaging – Canton Mill / Waynesville Plant
175 Main Street • PO Box 4000
Canton, North Carolina 28716 • 828-646-2000

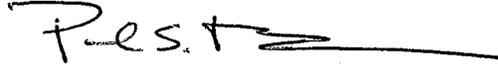
Allen Gaither, NC DENR DWM
2 Sep 2010, Page 2

If you have questions concerning the closure and post-closure financial estimate, please call us or contact Guy Cote with Sevee & Maher (207-829-5016).

Sincerely –



James Giaque
Landfill Supervisor and Solid Waste Coordinator
Canton / Waynesville
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Paul Dickens
Manager, Environmental Health and Safety
Canton / Waynesville
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Enclosures (2):

Cost Estimate Form for Closure of a Lined Landfill, DENR #44-06, prepared by SME, 20 Aug 2010
Post Closure Monitoring and Maintenance Cost Documentation

Cc (w/ enclosure): C. File – Solid Waste
Permit File – Solid Waste

Guy Cote - SME

Dane Griswold
Matt Claypool
Dale Henderson
John Pekar
Billy Clarke

Cost Estimate Form for Closure of a Lined Landfill



Facility Name:	2010 CLOSURE ESTIMATE FOR LANDFILL NO. 6
Address of Facility:	CANTON, NORTH CAROLINA
Owner:	EVERGREEN PACKAGING - CANTON MILL
Phase:	AREA 6A-WEST AND 6D-SOUTH
30 Acres (15 acres soil only 6A-West and 15 acres with HDPE 6D-South)	
DENR Permit #: 44-06	

Task		Unit	Unit Cost	Quantity	Total Cost
I Design of Final Closure Plans	Cat 1				
Engineering Cost	100	TS	\$50,000.00	1	\$50,000.00
Plans	110	TS			\$0.00
Modification/Closure Plan Review Fees	120	TS			\$0.00
II Mobilization, Demobilization & Insurance	Cat 2				
Total cost	200	TS	\$25,000.00	1	\$25,000.00
Other	210				\$0.00
III Erosion Control	Cat 3				
Silt Fence	300	LF	\$3.50	6000	\$21,000.00
Erosion Matting/ Blanket	310	EA	\$20,000.00	1	\$20,000.00
Hay Bale Sediment Barrier	320	LF			\$0.00
Hay Mulch Cover	330				\$0.00
Check Dams	340	EA			\$0.00
Other	350	TS	\$5,000.00	1	\$5,000.00
IV Waste Relocation	Cat 4				
Test Pits (to define limits of refuse and/or ground water to refuse contact)	400	DAY			\$0.00
Clearing & Grubbing	410	SY			\$0.00
Waste Regrading	420	CY	\$20,000.00	1	\$20,000.00
Other	430				\$0.00
V Capping	Cat 5				
A Cap (Material and Installation)					\$0.00
Geomembrane - 40 mil HDPE	510	SF	\$0.40	652500	\$261,000.00
Common Borrow Soil Layer - 18" thick	520	CY	\$6.00	36300	\$217,800.00
Common Borrow Soil Layer - 36" thick	530	CY	\$6.00	72600	\$435,600.00
Anchor Trench	540				\$0.00
Geotextile 16 oz.	541	SF	\$0.25		\$0.00
Geotextile 12 oz.	542	SF	\$0.20	652500	\$130,500.00
Geocomposite	543	SF	\$0.60	652500	\$391,500.00
Other	550				\$0.00
B Gas Vents Devices	Cat 6				\$0.00
Gas Wells	600	VF	\$80.00	0	\$0.00
Gas Vents	610	LF	\$20.00	6000	\$120,000.00
C Layers	Cat 7				\$0.00
Drainage Layer - Washed Aggregate - 6" thick	700	CY	\$10.00	12100	\$121,000.00
Intermediate Cover Placement	710	CY	\$0.00	0	\$0.00
Sand - Protective Gas Venting Layer - 12" thick	720	CY	\$7.00	0	\$0.00
Topsoil/Loam or Manufactured Soil - 6" thick	730	CY	\$10.00	24200	\$242,000.00
Sand Bags for berms	740	ea	\$0.15		\$0.00
Other	750				\$0.00

Updated 8/20/2010

Task		Unit	Unit Cost	Quantity	Total Cost
VI Stabilization, Run-off Control	Cat 8				
Seed & Mulch (Include Lime, Fertilizer, Seed & Hay Mulch)	800	Unit	\$45.00	1300	\$58,500.00
Surface Water Diversion Swales (Installed in 10/2004)	810	LF	\$0.00	6000	\$0.00
Stone Rip-Rap	820	LF	\$35.00	0	\$0.00
Piping 6 inch	852	LF	\$10.00	7000	\$70,000.00
Piping Connections	853	EA	\$1,000.00	12	\$12,000.00
Stormdrain system	860	EA	\$50,000.00	1	\$50,000.00
VII Monitoring Devices	Cat 9				
Settlement Monuments/Plates	900	EA			\$0.00
Groundwater Monitoring Wells	910	EA			\$0.00
Gas Monitoring Probes	920	EA	\$1,000.00	8	\$8,000.00
Other	930				\$0.00
VIII Roadway	Cat 10				
Access Roadway	1000	LF			\$0.00
Drainage Ditches	1010				\$0.00
Culvert Inlet & Outlet Headwalls	1020				\$0.00
Guide Rail	1030	LF			\$0.00
Culverts	1040	LF	\$70.00	500	\$35,000.00
New/Replaced Pavement	1050	SY			\$0.00
Other	1060				\$0.00
IX Miscellaneous	Cat 11				
Signs	1100	LS			\$0.00
Perimeter Fence	1110	LF	\$10.00	0	\$0.00
Entry Gate - Double Unit	1120	EA			\$0.00
Miscellaneous Work and Cleanup	1130				\$0.00
Ledge Removal	1140	CY			\$0.00
Other	1150				\$0.00
X Surveying	Cat 12				
Baseline, Bench Marks, and Survey Control	1200	EA	\$5,000.00	1	\$5,000.00
Other	1210				\$0.00
XI Construction Phase Testing	Cat 13				
Compaction Testing	1300				\$0.00
QAQC	1310		\$30,000.00	1	\$30,000.00
Other	1320				\$0.00
XII Engineering	Cat 14				
Resident Engineer, Project Manager, Project Engineer	1400		\$200,000.00	1	\$200,000.00
Record Drawings	1410				\$10,000.00
Other	1420				\$0.00
XIII Other (list)	Cat 15				
	1500				\$0.00
	1510				\$0.00
XIV Contingency (minimum 10%)	Cat 16				
	1600	LS	10%	2538900	250,000
Total Closure Cost					\$2,788,900

Total Closure Cost Rounded	\$2,789,000
Post Closure Monitoring and Maintenance	\$3,456,000
Corrective Action	\$3,000,000
Total Financial Assurance	\$9,245,000

Evergreen Packaging - Canton Mill
 Landfill No. 6
 Canton, North Carolina
 Post-Closure Monitoring and Maintenance Costs

Inflation Rate 1.20%

1. Landfill Maintenance Cost

a. General site repairs and maintenance.

	ESTIMATED COSTS		total cost	Adjusted for Inflation
	years	cost/year		
Required repairs will include erosion repairs of the cover system, siltation removal from the stormwater conveyance system, surface repairs to the roads, and culvert maintenance.	1-10	\$10,000	\$100,000	(\$105,576)
	11-30	\$5,000	\$100,000	(\$126,487)

Approximately 150 acres of the landfill facility will require mowing. Mowing will occur twice per year.

1-30	\$15,000	\$450,000	(\$537,827)
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b. Snow removal.

Road maintenance during the winter months will include plowing, sanding, and shoveling

1-30	\$10,000	\$300,000	(\$358,551)
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c. Gas control system.

Not Applicable

1-30	\$0	\$0	\$0
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SUBTOTAL LANDFILL MAINTENANCE (\$1,128,441)

2. Landfill Inspections

a. Mill inspections

This item provides the cost for periodic inspections by Evergreen personnel. The first 3- years will require 2 visits per year. Years 4-30 will require 1 visit per year.

1-3	\$1,000	\$3,000	(\$3,036)
4-30	\$600	\$16,200	(\$19,691)

b. Independent engineering firm

Cost associated with this item include 2 site inspections per year for the first three years of post closure and 1 site inspection per year for the last twenty seven years.

1-3	\$3,000	\$9,000	(\$9,108)
4-30	\$2,000	\$54,000	(\$65,638)

c. Geotechnical Inspections

This item includes the cost associated with one site inspection per year for the 30-year post closure period. Cost include the review of data (piezometers, settlement, gauges, etc.), and a letter report documenting the condition of the landfill.

1-30	\$2,000	\$60,000	(\$71,710)
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SUBTOTAL INSPECTION COST (\$169,184)

Evergreen Packaging - Canton Mill
 Landfill No. 6
 Canton, North Carolina
 Post-Closure Monitoring and Maintenance Costs

3. <u>Leachate Management</u>	year	cost/year	cost	
<u>a. Replacement Cost</u>				
These costs are assumed replacement costs for the leachate pond liner (20 yr life), leachate pumps (10 year life), and flow meter and controls (15 yr life).				
Pond liner (40,000 SF)			\$50,000	(\$50,000)
Pumps			\$28,000	(\$28,000)
<u>b. Preventative Maintenance</u>				
Assumes biennial preventative maintenance of the leachate force main, cleaning and inspection of the leachate pond liner and annual cleaning and inspection of the leachate collection system.				
	1-30	\$15,000	\$450,000	(\$537,827)
<u>c. Electric cost (pump station)</u>				
This item includes the electrical cost for two pump stations.				
	1-30	\$2,000	\$60,000	(\$71,710)
<u>d. Leachate Treatment</u>				
Cost associated with treating the leachate pumped to the WWTP. Leachate generation is based on geomembrane covers for 6D-South and soil covers on 6A-East, West, and B and C.				
	1-30	\$ 0.0004	9007500	\$108,090 (\$129,186)
<u>e. General cost</u>				
This item includes costs associated with general repairs and maintenance to the pump station buildings, pumps, fitting, valves, meters and lights.				
	1-30	\$5,000	\$150,000	(\$179,276)
SUBTOTAL LEACHATE MANAGEMENT				(\$995,998)

