



North Carolina Department of Environment and Natural Resources

Division of Waste Management

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Governor

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Director

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Secretary

February 10, 2011

Mr. Paul Dickens
Evergreen Packaging
PO Box 4000
Canton, North Carolina 28716

Subject: FA Cost Estimate Revisions
Blue Ridge Paper Industrial Landfill
Haywood County, Permit #44-06, Document ID No. 12883

Mr. Dickens:

The Division of Waste Management, Solid Waste Section (Section) has completed review of the document titled *Revised Estimate for Landfill Financial Assurance* (DIN 12882). This document was received by the Section, via email, on February 8, 2011.

Based on this review, it has been determined the Section cannot approve the Financial Assurance cost estimates without additional revisions:

1. Environmental monitoring costs, as well as costs associated with maintenance of the environmental monitoring network, are the only Post-closure costs allowed to be moved under the Potential Assessment and Corrective Action (PACA) cost category. Leachate collection and treatment are not considered part of the environmental monitoring network and cannot be moved under the PACA cost category. Therefore, all costs associated with leachate management, collection and treatment must be captured in the Post-closure cost category.
2. All costs, even those within the PACA cost category, must be itemized. Therefore, water quality monitoring, testing and reporting costs listed in the PACA cost category must show line item dollar amounts for each entry.

If you should have any other questions regarding this matter please contact me at (828) 296-4703, or by email at allen.gaither@ncdenr.gov.

Sincerely,

Allen Gaither
Environmental Engineer

Cc: Mr. Jim Giaouque – Evergreen Packaging
Mr. Guy Cote – Sevee & Maher Engineers
Mr. Donald Herndon – SWS/RCO

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