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Domtar Paper Company, LLC
Plymouth Mill
PO Box 747
Highway 149 North
Plymouth, NC 27962
Tel.: (252) 793-8111



May 5, 2008

Paul S. Crissman, Chief
Solid Waste Section
Division of Waste Management
1646 Mail Service Center
Raleigh, N.C. 27699-1646

Certified Mail
Return Receipt Requested

Subject: Domtar Paper Company, LLC
Plymouth Pulp and Paper Manufacturing Facility
Name Change Request for Solid Waste Permit # 94-01



Dear Mr. Crissman:

Domtar needs to bring to your attention the continuing issue of the transfer of ownership, and completing the name change, for the referenced landfill permit from Weyerhaeuser to Domtar. This process was initiated in late 2006 when Plymouth Environmental Staff met with Solid Waste Section Staff for guidance concerning transferring this permit.

Charles Douthwaite, of Weyerhaeuser's Law Department, then discussed this issue with Nancy Scott of the North Carolina Attorney General's Office in February of 2007. Mr. Douthwaite subsequently submitted the information requested by Ms. Scott to facilitate the ownership transfer. Ms. Diane Hardison, Domtar – Plymouth Environmental Manager, submitted a package formerly requesting the name change and permit transfer on March 8, 2007. The Company's understanding was that Domtar had submitted all required information at that time.

In October of 2007, your agency requested information regarding the compliance history of legacy Domtar Mills. Mr. Guy Martin, Domtar Corporate Environmental Director, provided this information. Again, the Company expected that this was the final piece of information required by your office.

On February 25, 2008, Plymouth Environmental staff received an email requesting yet more information from Ed Mussler of your staff. We are enclosing the requested information in this letter with the exception of the requested fee, which had not been brought to Domtar's attention up to this point.

You will find attached:

- a list of the Division of Waste Management's requested information from the 2/25/08 email with inserted answer from Domtar,
- copies of Deed documents (3 pages),
- a copy of the March 8, 2007 cover letter from the first written request for permit transfer, originally addressed to Mr. Poindexter.

Domtar would have expected the Division of Waste Management to address the Company's request for the transfer of ownership and permit name change in an orderly and expeditious manner. Domtar is frustrated with the lengthy and apparently ad hoc approach that the Division of Waste Management is applying to this seemingly straight forward process. The Company's experience in dealing with all other Divisions within the NC Department of Environment and Natural Resources is that revised permits or notices of transfers are completed within two months of the original request, usually without issue. Unfortunately, unlike the other Divisions within DENR, the DWM has not provided a complete, single set of criteria or requested information to Domtar in order to facilitate this permit transfer. Again, this is a significant source of frustration and inefficiency to Domtar. As a reference, all other DENR agencies provide written, clear instruction and forms (available on website, consistent for all requestors), and responsive contact personnel to facilitate their approval processes. It should also be noted that DWM personnel have not responded in a timely manner to requests by Domtar through email and/or phone communications.

Domtar takes its environmental and social responsibilities very seriously. The Company does not want to be in the position of operating a landfill it owns, but which is registered under another Company's name. The delays in the transfer have not been due to either Domtar's or Weyerhaeuser's actions.

Domtar also does not accept the request by the DWM for the landfill permit fees, as this issue would clearly not have surfaced if the DWM had processed the permit transfer request in a reasonably timely manner.

With this submittal, Domtar understands that the DWM requires nothing further in order to process our request to transfer the landfill permit. Thank you in advance for your prompt attention to this critical issue for Domtar.

Sincerely,



Norman H. Bush
Vice President/General Manager

cc: Guy Martin Diane Hardison Bill Morris Ed Mussler (DWM)

ATTACHMENT 1

2/25/08 requested information, emailed to Domtar from the DWM

DWM Q 1 - The link, via recorded documents where Domtar assumed the assets of Weyerhaeuser. We think we see the recorded transaction in the Register of Deeds, but need Domtar to provide us the correct reference and a copy.

Domtar A 1 - This has been provided through the comprehensive packages submitted 2/15/07 (from Douthwaite, copies to Guy Martin), and 3/8/07 (from Diane Hardison).

DWM Q 2 - Because landfills are recorded against property and indexed in the Grantor Index, we need to know specifically what parcel, owned by Domtar, the landfill is on. There appear to be numerous deeds in a transaction that likely includes the deed or deeds that pertain to the landfill.

Domtar A 2 – The landfill is located on several parcels: 8702, 6280, 6293, and 4198. A map showing these parcels is included with this submittal as Attachment 2

DWM Q 3 - Senate Bill 1492, passed last August requires the Section to collect permit fees. The fee for transfer of ownership of an industrial landfill permitted for 100,000 tons per year or more is \$18, 500. We will send you an invoice, please send us the appropriate billing information.

Domtar A 3 – Domtar does not believe this fee applies to our request. We made the request for permit name change and transfer of ownership prior to the promulgation of the revised rule. Further, Domtar's request was held up at no fault of the company but, rather due to DWM circumstances. We were never informed prior to Ed Mussler's email of 2/25/08 that we would be charged a fee. We will be submitting an application for phase 3 & 4 of the landfill in just a few weeks which will include payment of the required permit application fee.

DWM Q 4 - We have a letter from an offsite corporate person that says they agree to all of the existing documents and plans and operation plan. Please provide us a letter from the on-site operation that also acknowledges that the existing plans, procedures and operations plan will be followed.

Domtar A 4 – Domtar provided this statement in the 3/8/07 submittal to Poindexter (copy provided in Attachment 3). Please refer to the last paragraph of the cover letter.

ATTACHMENT 2
Deed Documents

Plymouth, NC
Washington County

FILED in Washington County, NC
on Mar 15 2007 at 01:33:17 PM
by: Elaine G. Vann
Register of Deeds
BOOK 443 PAGE 592

REVENUE STAMPS PAID \$ -0-

Deed Prepared By:

Peggy Hebblethwaite
Weyerhaeuser Company
33663 Weyerhaeuser Way South
Federal Way, WA 98003

Return To After Recording:

DOMTAR PAPER COMPANY, LLC
100 Kingsley Park Drive
Fort Mill, SC 29715-6476

WASHINGTON COUNTY, N. C.

PARCEL IDENTIFIER NO. SEE DEED

ASSIGNED OR VERIFIED BY: T. Epler DATE: 3/15/2007

Excise Tax: \$0.00 (exempt pursuant to NCGS Section 105-228.29(6);
no consideration/business convenience).

SPECIAL WARRANTY DEED

THIS INDENTURE, made as of the 5th day of March, 2007, by and between
WEYERHAEUSER COMPANY, a Washington corporation, (hereinafter "Grantor"),
and DOMTAR PAPER COMPANY, LLC, a Delaware limited liability company,
(hereinafter "Grantee").

WITNESSETH:

THAT Grantor, in consideration of the sum of Ten Dollars (\$10.00) and other
good and valuable consideration, to it paid by Grantee, the receipt of which is
hereby acknowledged, does by these presents, grant, bargain, sell, and convey
specially unto Grantee, its successors, and assigns the lots, tracts, or parcels of
land situated in the County of Washington, State of North Carolina (the
"Property"), and described on *Exhibit A* attached hereto and incorporated herein
by reference, subject to all documents and instruments of record as of the date
hereof and the matters set forth on *Exhibit B* attached hereto and incorporated
herein by reference.

Plymouth, NC
Washington County

The Property was acquired by Grantor by instruments dated December 19, 1966 recorded in Volume 213, Page 474, dated June 5, 1969 recorded in Volume 225, Page 35, dated August 17, 1973 recorded in Volume 240, Page 546, dated March 1, 1974 recorded in Volume 243, Page 188, dated March 4, 1974 recorded in Volume 243, Page 191, dated April 4, 1974 recorded in Volume 243, Page 562, dated June 10, 1974 recorded in Volume 245, Page 190, dated October 11, 1973 recorded in Volume 241, Page 460, dated October 9, 1985 recorded in Volume 303, Page 153, dated May 29, 1997 recorded in Volume 365, Page 732, dated March 9, 1998 recorded in Volume 370, Page 822, dated September 4, 1998 recorded in Volume 374, Page 848, dated February 2, 2001 recorded in Volume 390, Page 789, dated November 29, 2001 recorded in Volume 402, page 163, dated March 22, 2002 recorded in Volume 402, Page 178, dated November 22, 2002 recorded in Volume 402, Page 182,, dated March 3, 2003 recorded in Volume 408, Page 476, Washington County Registry.

TO HAVE AND TO HOLD THE PROPERTY TOGETHER WITH ALL BUILDINGS, FIXTURES, AND OTHER IMPROVEMENTS THEREON, with all and singular, the rights, privileges, appurtenances, and immunities thereto belonging or appertaining unto Grantee and unto Grantee's successors and assigns forever, Grantor hereby covenanting that the Property is free and clear from any encumbrance done or suffered by Grantor; and that Grantor will warrant and defend the title to said Property unto Grantee and unto Grantee's successors and assigns forever, against the lawful claims and demands of all persons claiming by, under, or through Grantor, subject in each case to the documents, instruments and matters referenced above.

IN WITNESS WHEREOF, Weyerhaeuser Company has caused this Special Warranty Deed to be executed by its duly authorized officers effective the day and year above written.

WEYERHAEUSER COMPANY



By: Scott R. Marshall
Scott R. Marshall

Its: Vice President

Attest: G. W. Bjerke
G. W. Bjerke

Its: Assistant Secretary

Landfill Parcel #'s



ATTACHMENT 3

Copy of March 8, 2007 cover letter for Domtar's request for permit name change and transfer of ownership.

March 8, 2007



Domtar Paper Company, LLC
Plymouth Mill
PO Box 747
Highway 149 North
Plymouth, NC 27962
Tel.: (252) 793-8111

Certified Mail
Return Receipt Requested

Mr. Mark Poindexter
Division of Waste Management
NC Department of Environment and Natural Resource
1646 Mail Service Center
Raleigh, NC 27699-1646

***Subject: Request for Name and Ownership Change from Weyerhaeuser Company to
Domtar Paper Company, LLC - Solid Waste Permit No. 94-01***

Dear Mr. Poindexter:

Weyerhaeuser's pulp and paper manufacturing facility in Plymouth, NC became part of a new company named Domtar Paper Company, LLC on March 7, 2007. As a result of this transaction, Domtar requests name change and transfer of ownership of "Permit to Operate Industrial Waste Landfill Facility Permit No. 94-01". We have enclosed the following items with this request:

- A copy of the February 6, 2007 letter (with attachments) from Charles Douthwaite, Law Department of Weyerhaeuser to Ms. Nancy Scott, Assistant Attorney General for North Carolina

No changes to the NC DENR approved design and operating plan for the landfill will occur as a result of this business transaction. Further, Domtar Paper Company, LLC is knowledgeable of the terms and conditions of the current permit and operating plan. The Plymouth mill environmental staff will continue to administer the terms and conditions of the permit and operating plan after the transaction as we have been doing prior to the transaction.

Please make note of the revised P.O. Box number for the mill in the following new address.

Domtar Paper Company, LLC
P.O. Box 747
Plymouth, NC 27962

Should you have any questions or require additional information concerning this request, please contact Bill Morris at 252-793-8494 or me at 252-793-8611.