



North Carolina Department of Environment and Natural Resources
Division of Waste Management

Beverly Eaves Perdue
Governor

Dexter R. Matthews
Director

Dee Freeman
Secretary

SOLID WASTE SECTION
June 15, 2010

Mr. Bill Morris, Environmental Manager
Domtar Paper Company, LLC
Post Office Box 747
Plymouth, North Carolina 27962

Subject: Amendment – Permit to Construct (PTC) – Completeness Determination and Technical Review
Domtar Paper Company Landfill
Industrial Solid Waste Landfill, Permit No. 94-01
Washington County, DIN 10869

Dear Mr. Morris:

On May 6, 2010 the Division of Waste Management (Division), Solid Waste Section (Section) received your application for a Permit to Construct, Amendment at Domtar Paper Company, Permit No. 94-01 in Washington County, entitled;

Phase 3 and Phase 4, Construction Plan Application, On-site Industrial Waste Landfill No.3, Domtar Paper Company, LLC (Formerly Weyerhaeuser Company), Plymouth, North Carolina. Prepared for Domtar Paper. Prepared by RMT North Carolina. June 2008. DIN 10526.

The Division has performed a review of you application for a determination of completeness and determined the application is complete in accordance North Carolina General Statute NCGS 130A-295.8(e). A determination of completeness means the application contains the required components in accordance with North Carolina Administrative Code 15A NCAC 13B .0500. In addition to the determination of completeness the Division has completed the technical review of the application and requests that you respond to the following items in order to expedite the application;

1. Please provide a copy of the Company's NPDES Permit for inclusion in the Application.
2. Review all LCS components and design to ensure the ability of the owner/operator to clean and inspect the LCS.
3. Due to issues experienced across the State with the blockage of leachate collection systems (LCS) from fouling and other failures, the Division is requiring the Operation Plan include a Leachate Management Plan. At a minimum the Plan should include the following provisions;
 - a. Remote camera inspection of leachate collection lines after construction.
 - b. Cleaning of leachate collection lines once a year.
 - c. Remote camera inspection of leachate collection lines once every five (5) years.
 - d. Cleaning and remote camera inspection of leachate collection lines following the clearing of blockages.
 - e. Include in the LCS Management Plan discussion on planned pump maintenance and the prevention of leachate storage over the liner of greater than 12 inches.

Note: The Division may consider reduction in frequency for cleaning and inspection, upon written request from the Facility, after the first five years, pending the results of the cleaning and remote camera inspection.



Page 2
Domtar Paper
June 15, 2010

4. Section 4.2.2 – Indicates that Landfill No. 3 will overlap Landfill No. 2. The drawings do not indicate this scenario; provide a drawing of these areas.
5. North Carolina General Statute NCGS 130A-295.2 requires a permit holder to establish and maintain financial assurance with sufficient funds to provide for both closure costs and post-closure maintenance, of all permitted phases of the landfill. Additionally, NCGS 130A-295.2 requires the permit holder to establish financial assurance sufficient to cover a minimum of three million dollars (\$3,000,000) for potential assessment and corrective action at the facility. In order to establish financial assurance the Division requests;
 - a. Submission of cost estimates that reflect third party closure and post-closure costs – The estimates for this facility should include Phases 1 through Phase 4, phases which will with this permit.
 - b. Submission of potential assessment and corrective action costs – The Division requires cost estimates for any ongoing corrective action plan as well as cost estimates for landfill gas and groundwater monitoring and maintenance. If the cost estimates are less than \$3,000,000 the facility will be required to post the minimum amount of \$3,000,000. On the one year anniversary of this financial assurance mechanism, cost estimates will be reviewed by the Division to determine if this facility needs to provide more financial assurance than the minimum \$3,000,000.

Note: The submission will be reviewed by the permitting engineer for accuracy and presentation of a reasonable dollar amount. Once the amount is established and approved by the Division, the Facility shall provide the appropriate financial assurance mechanism in the approved amount. The Division's compliance staff will ensure that the mechanism is received, is appropriate, and is regularly updated, 15A NCAC 13B .1628(e) describes the allowable mechanisms which may be used to establish financial assurance.

Should you have any questions regarding this matter you may contact me at (828) 296-4704 or at Larry.Frost@ncdenr.gov.

Sincerely,

Larry Frost
Environmental Engineer

cc: Mike Parker – RMT, 30 Patewood Drive, Suite 100, Greenville, SC 29615-3535
Dan Madison – RMT
Ray Williams – SWS/WiRO
Elizabeth Werner – SWS/CO