



Permit No.	Date	DIN
94-01	June 22, 2010	10914

Trip Report

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RECEIVED
June 21, 2010
 Solid Waste Section
 Asheville Regional Office

Project Name: Domtar--Plymouth, NC--Landfill No. 3 Closure and Expansion Activities
Project No.: 05794.41 **Date:** 6/21/10
Date of Trip: June 16/17, 2010
Prepared By: Mike Parker **Title** Senior Client Service Manager
Signature: *Mike Parker*
Client/Company Name: Domtar Paper Company, LLC
Distribution List: Larry Frost and Elizabeth Werner, NCDENR
 Diane Hardison and Bill Morris--Domtar, Plymouth, NC
 Todd Martin--RMT Madison, WI
 Travis Tarbet--RMT Greenville, SC

The following represents our understanding of matters discussed. Any correction or omission of merit should be reported promptly to the author.

Subject: Meeting at the Plymouth Mill on June 17, 2010

The following individuals met at the Plymouth Mill on June 17th, 2010: Larry Frost and Elizabeth Werner, NCDENR; Bill Morris, Domtar, and Travis Tarbet and Mike Parker of RMT North Carolina, Inc. The purpose of the meeting was to discuss the activities associated with Landfill No. 3 at the Domtar Plymouth Mill.

On June 15 Domtar and RMT both received the Design Hydrogeology Approval letter for the Phase 3 and 4 Construction Plan Application from NCDENR—Elizabeth Werner. At the meeting, Larry Frost presented and reviewed his Completeness Determination and Technical Review letter of the Phase 3 and 4 Construction Plan Application. (Both letters are attached)

Key discussion items included the following:

NCDENR would like a copy of Domtar's NPDES permit

- NCDENR requests Domtar to provide for the ability of operator/owner for all Leachate Collection System (LCS) components to be cleaned and inspected. Provide also for a camera inspection following construction. (Currently Domtar has a program to clean the LCS every June)
- NCDENR will require camera inspection every 5 years and/or after any blockages.
- NCDENR requests Domtar to modify LCS Management Plan to include a discussion on pump maintenance and preventing leachate from getting to a depth of greater than 12" over liner.

Trip Report

- NCDENR will be open to a reduction in cleaning and inspection frequency based on results of initial results. Request must be made by Domtar in writing.
- NCDENR request a copy of Domtar's landfill gas monitoring protocol
- NCDENR requested that the new location of the wood pile be shown on the plans
- Domtar/RMT clarified with Larry and Elizabeth that there are no plans in the future for Landfill No. 3 to overlap Landfill No. 2
- The current NCDENR Financial Assurance requirements were reviewed by Larry—RMT will assist Domtar in developing the required cost estimates and documents.
- NCDENR requested that the closure plan/drawings be provided to him 90 days prior to closure. Domtar/RMT reviewed the planned schedule with NCDENR. The schedule presented was: Site Walk Through for Closure of 1a/1b is scheduled for July 21st, 2010. Mobilize contractor and begin closure activities shortly after Labor Day-2010. The planned construction for Phases 3 and 4 are planned to take place in the first quarter 2011.

The group then toured Landfill Nos. 1, 2, 3 and the asbestos landfill as well as the total wastewater ponds and discharge system. NCDENR was complementary about the condition of all the landfills. While looking at Phases 1a/1b of Landfill No. 3 we discussed the "select ash fill" that is currently a part of the closure plan. Mr. Frost indicated that he did not see a need for this requirement and that the Operations Plan should be rewritten to indicate no sharp objects would be placed near the final fill elevation. RMT also presented a couple drawings and physically showed NCDENR where the storm water down slope flume structure would go. NCDENR was fine with this change in the design. RMT indicated that this storm water drainage system would also be part of the design for Phases 3 and 4.

NCDENR indicated they were pleased with what they observed and will work with Domtar/RMT to keep the planned schedule. Larry indicated that he was fine with electronic copies for review purposes but would eventually want one hard copy. That concluded the meeting.



North Carolina Department of Environment and Natural Resources

Division of Waste Management

Dexter R. Matthews

Director

Dee Freeman
Secretary

Beverly Eaves Perdue
Governor

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.



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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



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

Beverly Eaves Perdue
Governor

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Secretary

June 14, 2010

Mr. Bill Morris
Domtar Paper Company, LLC
Plymouth Mill
PO Box 747
Highway 149 North
Plymouth, NC 27962

Re: Permit to Construct Application – Design Hydrogeology Approval
Domtar Industrial Landfill #3 – Phases 3 and 4
Washington County
Permit No. 94-01
Doc ID No. 10859

Dear Mr. Morris:

The Solid Waste Section (Section) has reviewed the hydrogeology portion, including the water quality monitoring plan, of the Phase 3 and 4 Construction Plan Application for Industrial Landfill #3 submitted on June 20, 2008 (DOC IDs 10526 and 10522) and the responses to the Section's Hydrogeology Review letter (DOC ID 6788) submitted on November 24, 2009 (DOC ID 10858).

The Water Quality Monitoring Plan consists of 13 groundwater monitoring wells. Wells MW-1 and MW-1A are located upgradient of the landfill and provide background water quality data. Wells MW-2, MW-3, MW-4, MW-5, MW-6 and MW-6A (six wells) are located around the perimeter of Landfill No. 2 and wells MW-9, MW-10, MW-11, MW-12 and MW-13 (five wells) are located around the perimeter of Landfill No. 3. According to Sheet 3 in the Phase 3 and 4 Construction Plan Application, MW-7, OW-14, and OW-01 are scheduled to be abandoned.

Both the Design Hydrogeologic Report and the Water Quality Monitoring Plan meet the criteria required in 15A NCAC 13B .0538(b) and therefore, this portion of the Permit to Construct application is approved. An electronic pdf format copy of the approved Design Hydrogeologic Report and Water Quality Monitoring Plan (Tracking Document ID Nos. 10522 and 10526) can be obtained on the Section's website located at: <http://wastenotnc.org/sw/swfacilitylist.asp>

Piezometers, groundwater monitoring wells, and borings, associated with Phases 3 and 4 may be abandoned now or after a Permit to Construct is issued by the Solid Waste Section. Please adhere to the following conditions:

Prior to construction of cell(s), all piezometers, ground-water monitoring wells, and borings, located in the proposed cell(s), shall be properly abandoned by overdrilling first (exception of non-cased borings) and sealed with grout in accordance with 15A NCAC 2C.0113(b)(1), entitled “Abandonment of Wells”.

- a. In areas where soil is to be undercut, abandoned piezometers, monitoring wells, and borings must not be grouted to pre-grade land surface, but to the proposed base grade surface to prevent having to cut excess grout and potentially damaging the wells.
- b. Well abandonment records (GW-30 form) for each decommissioned piezometer, boring, and groundwater monitoring well must be certified by a Licensed Geologist in accordance with rule .1623(b)(2)(1) and submitted to the Solid Waste Section in accordance with 15A NCAC 02C.0114(b).

Additional Geologic, Ground Water and Monitoring Requirements will be included in the Permit to Construct.

If you have any questions, please do not hesitate to contact me via email Elizabeth.werner@ncdenr.gov or phone (919) 508-8496.

Sincerely,

Elizabeth S. Werner
Hydrogeologist
Solid Waste Section

cc: Mike Parker, PE - RMT
Dan O. Madison, Jr., PG - RMT
Larry Frost - SWS
Ed Mussler - SWS
Ray Williams - SWS
Central File