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RIEGELWOOD MILL  
865 JOHN L. RIEGEL ROAD  
RIEGELWOOD, NC 28456  
PHONE: 910 655 2211

October 19, 1999

North Carolina Department of Environment and Natural Resources  
Division of Waste Management  
Solid Waste Section  
401 Oberlin Road, Suite 150  
Raleigh, North Carolina 27605

Attention: Mr. James C. Coffey  
Head, Permitting Branch

CERTIFIED MAIL: Z 433 708 799

Reference: **Landfill Transition Plan**  
**International Paper - Riegelwood Mill**  
Industrial Landfill, Permit Number 24-02  
Riegelwood, North Carolina

Dear Mr. Coffey:

As you requested in your August 18, 1999 letter we are hereby providing our plans for transitioning out of our current industrial landfill. Our plans for closure of the existing landfill and development of a new one are discussed briefly below. Detailed plans for your review will be will be provided in accordance with the attached schedule.

### **New Site Development**

International Paper is working with Earth Tech Engineers in preparing a Site Suitability Study for a new industrial landfill. The site under evaluation is the 480 acres immediately east of the mill site referred to locally as the Gooseneck area. The area we plan to develop is anticipated to be approximately 50 acres.

We expect to submit the Site Suitability Study to the Solid Waste Section in December of this year and hope to expedite the site's design, permitting and construction to commence operation of the new industrial landfill in 2003. The application for a Permit to Construct will be completed after the Solid Waste Section

has concurred on the site's suitability. The attached preliminary schedule outlines the anticipated timing of design, permitting and construction activities.

### **Current Site Closure**

International Paper has recently contracted S&ME, Inc. to assist in the preparation of an interim operations plan, closure plan and post-closure plan for the existing industrial landfill. S&ME, Inc. has completed soil test borings and dilatometer testing to obtain in place strength and design parameters of the waste material. We have also contracted a firm to provide an aerial photo and topographic map of the site. Currently, S&ME is conducting laboratory testing on the waste materials collected during the field study and preparing the interim operation plan.

A closure plan will be developed from the phasing of the interim operational plan. We have attached a figure outlining the footprint for the operation and closure plan for your review. The final closure plan will consist of the final grades, final cover system, storm water management, erosion and sedimentation control, material borrow study, and post-closure plan.

The proposed final cover system will consist of a soil barrier layer with 6 inches of suitable material to support vegetation. We are evaluating the suitability of available residuals as a component of the final cover to reduce the need for borrow material.

The anticipated schedule for the preparation of the interim operation plan and closure plan is attached for your review. The schedule for the actual closure of the existing industrial landfill is directly related to the opening of the new landfill. However, operational preparations are being implemented for closure activities.

If you have any questions, require additional information or would simply like to discuss our plans please don't hesitate to contact me at (910) 655-6229.

Yours truly,



Edward J. Kreul  
Environmental Services Superintendent

**INTERNATIONAL  PAPER**

RIEGELWOOD MILL  
JOHN L. RIEGEL ROAD  
RIEGELWOOD, NC 28456  
PHONE 910-655-2211

October 18, 1999

Mr. Larry Rose  
North Carolina Division  
of Environmental Management  
Solid Waste Section  
P.O. Box 27687  
Raleigh, NC 27611-7687



**SUBJECT: Semiannual Groundwater Monitoring  
Landfill Permit No. 24-02**

Dear Mr. Rose:

As I indicated to you by phone on September 20 and again on October 18th, the Riegelwood landfill groundwater monitoring wells were effected by the high river levels caused by Hurricanes Floyd and Irene. This has set back our semiannual sampling event and subsequent report, which is normally filed in early October. We are monitoring the river levels and will have Law Engineering sample the wells as soon as is practicable. Thank-you for your cooperation on this issue.

If you have any questions or comments regarding this information, please contact me at (910) 655-6661.

Sincerely,



David B. Stevenson  
Senior Environmental Engineer

cc: Dr. Charles Stehman - Wilmington Regional Office  
Bobby Luffy - NC DEM Solid Waste Section

CF  
COLUMBUS  
FACILITY  
PERMIT

NORTH CAROLINA DEPARTMENT OF  
ENVIRONMENT AND NATURAL RESOURCES  
DIVISION OF WASTE MANAGEMENT

August 18, 1999



JAMES B. HUNT JR.  
GOVERNOR

WAYNE McDEVITT  
SECRETARY

WILLIAM L. MEYER  
DIRECTOR

Mr. Joe Zuncich, R. E. P.  
Environmental Resources Group Leader  
International Paper  
P. O. Box 8  
Riegelwood, N. C.

Re: Compliance Status of International Paper Industrial Landfill,  
Permit Number [REDACTED], Columbus County

Dear Mr. Zuncich:

The purpose of this letter is to inform the owner/operator of the current compliance status of the referenced landfill in accordance with the solid waste management rules, specifically Rule .0503(2)(d)(ii.)

Rule .0503(2)(d)(ii) of the solid waste management rules codified at 15A NCAC 13B required that operators of industrial waste landfills operating on or after January 1, 1998, submit to the Division a design that will ensure that the ground water standards established under 15A NCAC 2L will not be exceeded in the uppermost aquifer at the compliance boundary established by the Division in accordance with 15A NCAC 2L. The design shall be based upon modelling methods acceptable to the Division, which shall include at a minimum the following factors:

- (I) the hydrogeologic characteristics of the facility and surrounding lands;
- (II) the climatic factors of the area; and
- (III) the volume and physical and chemical characteristics of the leachate

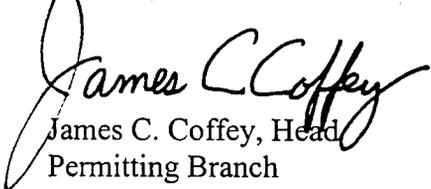
This letter is to inform you that the Division of Waste Management, Solid Waste Section(Section) has completed its review and has determined that the information submitted does not meet the requirements of this Rule. Specifically, the submitted ground water monitoring information does not demonstrate current compliance with the ground water standards in the upper most aquifer at the compliance boundary; the modelling information submitted does not provide adequate hydrogeologic characterization of the site to demonstrate future compliance with ground water standards in the upper most aquifer at the compliance boundary; and the information provided concerning previously disposed wastes does not provide accurate physical and chemical characteristics of the leachate.

Mr. Zuncich  
August 18, 1999  
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Therefore, the landfill owner/operator is required to submit a transition plan within 60 days of receipt of this letter. The transition plan shall include a reasonable schedule for obtaining compliance with this rule, including a plan for closure of the existing landfill and a plan for future management of waste. The Section will review the submitted transition plan and either approve the plan or require revisions to the plan.

If there are any questions, please contact me @ (919) 733-0692, extension 255.

Sincerely,

  
James C. Coffey, Head  
Permitting Branch  
Solid Waste Section

cc: Terry Dover  
Isaiah Guyton  
Matt Gamble