



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

SOLID WASTE SECTION

March 27, 2009

Mr. Jim Giaque
Blue Ridge Paper Products Inc.
PO Box 4000
Canton, North Carolina 28716

Subject: Engineering Technical Review – Permit to Construct
Blue Ridge Paper Landfill, No. 6D-South
Haywood County, Permit #44-06, Document ID No. 7071

Mr. Giaque:

The Division of Waste Management, Solid Waste Section (Section) has completed the engineering technical review of the documents titled *Permit to Construct Landfill No. 6D-South, Canton, North Carolina, Volumes I and II*, November 2008. It has been determined the Section requires clarification or additional information in order to complete the technical review. Please provide a response for each of the following items:

Volume I – Permit to Construct Application

1. Page 2-9 states *no known springs are located within the limits of Landfill No. 6 Area D-South*. Rule .0504(2)(a)(iii) requires *a map showing existing features to include: springs*. However, SEEP-2, as indicated on Figure 3-1 in Attachment 3 of the Permit to Construct application, appears to be within the landfill limits. Please describe how a seep varies from a spring.
2. Page 2-16 states *an operations manual, not included in this design, ... will include site development showing phases or progression of operation*. Rule .0504(2)(g) requires, *for reviewing a construction plan application, a site development showing phases or progression of operation*. Please provide a drawing showing, at minimum, annual phases of operation.
3. Page 2-17 states *an operations manual, not included in this design, ... will include site development showing phases or progression of operation*. Rule .0504(2)(h)(v) requires, *for reviewing a construction plan application, a description of systematic usage of area, operation, orderly development and completion of the sanitary landfill*. Please provide this description for review of the construction plan.
4. Page 4-2 in Attachment 2 notes *a pinhole density and installation defect rate of 1 per acre*. Could you please state the assumed diameter, or any other pertinent characteristics, of the pinhole/defect used to calculate the leakage rate in the HELP model.
5. Page 5-1 in Attachment 2 references Rule 15A NCAC 13B.0588. This rule does not exist in the Administrative Code.

Volume II – Design Report

6. Section 2.4 states *the purpose of the pipe extensions is to provide access to the header for cleaning and maintenance*. Due to recent leachate collection system failures, the Section is requesting more information regarding cleaning and maintenance. Please provide the procedure used to check for functionality and quantify the criteria that will be used to determine proper operation of the LCS. The Section recommends

annual jet cleaning and camera inspections to ensure proper functionality of the LCS. This frequency can be increased once the system is proven to be functioning properly.

7. Section 3.2.4 Leachate Pump Station (page 3-3) states *the pumps were designed to remove leachate...within an acceptable period of time*. Please specify that acceptable period of time.
8. The Liner (balloon 5) and the Regional Phreatic Surface pointers appear to be swapped on Figure 2 in Appendix B.

The Section will also be asking for Financial Assurance according to NCGS 130A-295.2 as well as the required Environmental Compliance Review according to NCGS 130A-295.3. In partial fulfillment of the Financial Assurance requirements, please submit cost estimates for closure and 30-year post-closure monitoring and maintenance of the facility. Other than the cost estimates, Mr. Donald Herndon, Compliance Officer, will be contacting you, under separate cover, regarding any further information that may be needed to satisfy these two requirements.

The Design Hydrologic Report technical review will be conducted by Ms. Christine Ritter, Hydrogeologist, and any related communication will follow under separate cover.

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

Sincerely,



Allen Gaither
Environmental Engineer

Cc: Guy Cote – Sevee & Maher Engineers
Christine Ritter – SWS/RCO
Donald Herndon – SWS/RCO
Andrea Keller – SWS/ARO