

# ANNUAL ENGINEERING INSPECTION REPORT (AEIR) FORM

Reporting Year: 2024

Note: Check applicable landfill class. Class 1 (Reg 22.423(b)) \_\_\_\_\_, Class 3 (22.522(a)) X, Class 4 (22.619(b)) \_\_\_\_\_

Facility Name: Domtar Lime Waste Class 3N Landfill AFIN: 41-00002 Permit #: 0296-S3N Landfill Class: 3N

Report Submittal Date: June 30, 2025 Date of Landfill Site Inspection by Certifying Engineer: March 6, 2025

***Complete the form as indicated  
Instructions are bolded and italicized.***

***COLUMN TO BE COMPLETED BY REPORTER***

Item	Regulation Reference	Item Description	Report Information/Comments/Remarks	Attachment Reference
1	22.423(b)(1) 22.522(a)(1)  22.619(b)(1)	Remaining volume in current cell.	a) ~ <u>133,078</u> cubic yards ( <i>as of 01/08/25</i> ) <i>NOTE: ~3,078 CY increase in remaining airspace year-over-year. The Lime Waste Landfill has seen an increase in available airspace due to lack of active disposal due to the waste diversion program (See Item 3 Below) and waste settlement over time. Waste settlement of 3,078 CY over the ~11.4 acre footprint equates to ~ 1" of global settlement.</i>	
		Projected date of opening new cell.	b) Date: <u>n/a</u>	
2	22.423(b)(2) 22.522(a)(2) 22.619(b)(2)	Remaining volume of all permitted units.	a) ~ <u>133,078</u> cubic yards	
		Total air space used during the reporting period.	b) ~ <i>320 CY of waste placed based on trucking records provided by Paper Mill Staff.</i>	
		Estimated remaining site life (years) based on utilization rate during the reporting period. <b><i>Note: Itemize current permitted unit/cell information - use attachment if necessary.</i></b>	c) Landfill Unit/Cell remaining life: Landfill unit/cell <u>Lime Waste Landfill</u> , <u>415</u> years.  d) Entire permitted landfill: <u>415</u> years remaining life.  <i>Site life remaining assumes Annual Airspace Used rate (Item 2b) remains constant until closure. However, hypothetically if the waste diversion program ends and waste disposal rates return to 100% (or approximately 32,000 CY/year assuming 99% of waste is currently being diverted), then the Lime Waste Landfill will be exhausted in ~4 years.</i>	



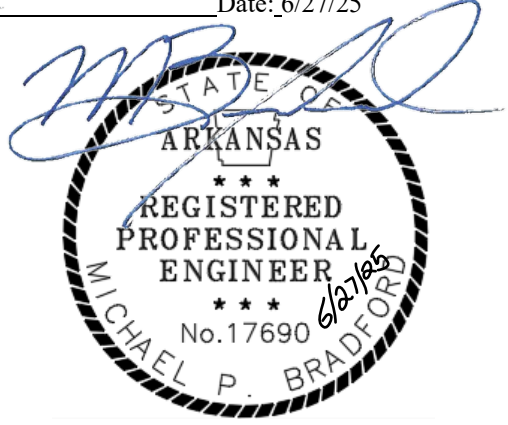
3	22.423(b)(3) 22.522(a)(3) 22.619(b)(3)	Documentation of fill progression in compliance with permit plans, specs and operating plan and narrative. <b>Note: Provide narrative regarding fill progression during the reporting period. Be specific about landfill unit/cell designations (example: Cell 1, Phase A completely filled; Cell 2, Phase A, 50% full, being filled south to north as of December 31). Specifically note any overfill conditions.</b>	a) Progression Narrative: <i>The Lime Waste Landfill is approximately 72% full. The Landfill fill progression is generally from the south to the north in the current prepared area. The Lime Waste Landfill is being filled to the maximum capacity that can be reached without affecting the efficiency of waste placement. No overfill conditions exist at this time. Note: Since November 2017, the mill has been diverting lime residual waste from the landfill for the purpose of using it as a soil amendment product. The mill is currently continuing this waste diversion and diverted approximately 99% of its lime waste from the landfill during the 2024 reporting period.</i>	
4	22.423(b)(4) 22.522(a)(4) 22.619(b)(4)	Documentation of compliance with regulatory operating requirements, permit conditions, approved operating plan, and other applicable regulations. <b>Note: Review current operating plans, and permit conditions. Include photographs of engineer's inspection as Attachment A. Check for weekly/monthly operational logs, waste volume records in and out of landfill, unauthorized waste form sheets, waste cover maintenance, stormwater reports to ADEQ, and wet weather repair information.</b>	a) Weekly/monthly operational logs exist (Y/N)? <u>Y</u> b) Photos of AEIR inspection attached (Y/N)? <u>Y</u> c) Waste volume in and out records exist (Y/N)? <u>Y</u> d) Unauthorized waste forms exist (Y/N)? <u>Y</u> e) Daily/weekly cover adequate at time of inspection (Y/N)? <u>N/A</u> f) Alternative Daily Cover (ADC) Plan located onsite (Y/N)? <u>N/A</u> Operations in compliance with ADC Plan (Y/N)? <u>N/A</u> g) Liquid Waste Management (LWM) Plan located onsite (Y/N)? <u>N/A</u> Operations in compliance with LWM Plan (Y/N)? <u>N/A</u> h) Liquids received to be bulked during reporting period: <u>N/A</u> gallons <u>N/A</u> tons i) Waste cover of inactive areas maintained adequately (Y/N)? <u>N/A</u> j) Net amount of waste disposed in landfill during reporting period: <u>320*</u> cubic yards _____ tons <i>*estimated by Mill Staff based on loose truck load delivered to the active waste disposal area, thus does not account for operational compaction and settlement.</i> k) Leachate head level less than 1' on liner at time of inspection (Y/N)? <u>Y</u>	<b>A</b>
5	22.423(b)(5) 22.522(a)(5) 22.619(b)(5)	Updated contour map that depicts: <b>Note: Provide updated drawing(s) and final cover permit drawing as Attachment B – discuss any discrepancies. Max. contour interval = 2 feet)</b>	a) Updated contour drawing attached (Y/N)? <u>Y</u> b) Final cover permit drawing attached (Y/N)? <u>Y</u> c) <b>List all discrepancies here: No discrepancies to report this period.</b> d) Is there an overfill condition (Y/N)? <u>N</u>	<b>B</b>

		(i) horizontal and vertical extent of active and inactive fill areas;		
		(ii) status of all permitted units/cells; <i>(Note: Label all active (working face, bulking area, stockpiles), inactive, closed and interim cover areas).</i>	a) Currently, does the facility have sufficient on-site quantities and types of soils for liner and cover construction of permitted units/cells (Y/N)? <u>Yes.</u> <u>See onsite soil analysis provided to ADEQ under ADEQ DOC ID 78893.</u>  b) If not, where will deficiency shortfalls be obtained (be specific)? _____ _____  c) Is the current Design Narrative earthwork balance accurate (Y/N)? <u>Y</u>	
		(iii) survey grid (required by 22.426); <i>Note: Include benchmarks and horizontal controls</i>		
		(iv) location of other visible surface features or improvements (e.g., roads, buildings, gas control systems, etc.); <i>Note: Include leachate risers, manholes, monitoring wells, gas wells, etc.</i>		
		(v) the person responsible for gathering the survey data and the date survey data was taken to prepare the map. <i>Reminder: Reporting period is calendar year. Survey data should be collected to reflect the AEIR reporting period.</i>	a) Name: <u>SCS Engineers,</u> b) Name of person using the data to produce contour map: <u>Tyler Warren, P.E.</u> c) Date survey data was collected: <u>1/8/25</u>	
6	22.423(b)(6) 22.522(a)(6) 22.619(b)(6)	Quantity, location, and characteristics of leachate collected, recirculated, and disposed. <i>Note: Provide analytical report as Attachment C. Provide brief narrative on this form in space provided about leachate sources, how leachate is collected, measured and disposed. Also, explain how the leachate head on the landfill liner is monitored and measured.</i>	a) Leachate Collected: <u>1,114,520</u> gallons b) Leachate Disposed: <u>1,114,520</u> gallons c) Leachate Recirculated: <u>N/A</u> gallons d) Leachate Recirculation Plan exists (Y/N)? <u>N/A</u> ADEQ approval Doc # <u>N/A</u> e) Leachate operating records exist (Y/N)? <u>Y</u> f) Leachate analytical report attached (Y/N)? <u>Y</u>  g) Leachate narrative (collection, measurements and disposal):	C

			<p><i>Leachate and stormwater commingle within the landfill containment berm and are collected in a concrete sump located on the east side of the landfill outside the waste limit. Liquid collected are pumped into the Paper Mill's NPDES permitted wastewater treatment system. An elapsed run-time meter is used to estimate the quantity of leachate that is pumped from the Landfill into this system.</i></p> <p>h) Leachate narrative (verifying &lt;1' head on liner system):  <i>The Lime Waste Landfill leachate pump station was pumping at the time of the inspection. The liquid level in the sump was visually verified to be at or below the top of the inlet line incoming from the Lime Waste Landfill's leachate collection and recovery system (LCRS). It is known that the inlet line from the LCRS sits below the top of the liner system, thus at the time of observation the liquid level was verified to be less than 1' over the liner.</i></p>	
7	22.423(b)(7) 22.522(a)(7) 22.619(b)(7)	Maintenance of stormwater controls and best management practices for erosion control. <b>Note: List any upset conditions during the reporting period (i.e., washouts, etc...). Also, include narrative about vegetation maintenance and repair.</b>	<p>a) <b>Briefly list maintenance activities and upset conditions here:</b>  <i>No upset conditions were documented during the reporting period. However, maintenance of the working face and landfill slopes are continuous. No cover is required on the landfill, however, some material that is washed from the waste slopes accumulates inside the perimeter berm and will be removed upon dry conditions and placed back on the slopes or within the active disposal area.</i></p>	
8	22.423(b)(8) 22.619(b)(8)	Status of capping and closure of completed areas. <b>Note: List areas with acreage that have received interim or final cover. Include total landfilled area acreage not yet under final certified closed cover. Note: "Certified closed" means the facility has received an approval letter from ADEQ accepting the engineer's closure certification report.</b>	<p>a) Lndfl unit/cell _____, _____ acres. Intrm or Final Cover (I/F): ____</p> <p>b) Lndfl unit/cell _____, _____ acres. Intrm or Final Cover (I/F): ____</p> <p>c) Lndfl unit/cell _____, _____ acres. Intrm or Final Cover (I/F): ____</p> <p>d) Lndfl unit/cell _____, _____ acres. Intrm or Final Cover (I/F): ____</p> <p>e) Acres of disposed waste not under final certified cover: <u>11.4</u> acres</p> <p>f) Acres of disposed waste area that have interim cover: <u>0</u> acres</p> <p>* Lime Waste Landfill is not required to place routine or intermediate cover. All slopes are below final waste grade at this time.</p>	
9	22.423(b)(9) 22.522(a)(8) 22.619(b)(9)	Status of remedial or corrective action activities. <b>Note: List corrective action events during reporting period (e.g., seeps and erosion correction, leachate spills, unauthorized waste handling and removal, etc...), and indicate whether action was taken in response to an ADEQ inspection.</b>	<p>a) <b>Briefly list corrective actions events here:</b>  ADEQ performed routine quarterly inspections on 2/20/24, 5/16/24, 8/13/24, and 11/14/25. The ADEQ inspector in each case concluded each inspection with no observed allegations of noncompliance.</p> <p>b) Were any of the corrective actions taken in response to an ADEQ inspection (Y/N)? <u>N/A</u></p> <p>c) Current status of corrective actions: <u>N/A</u></p> <p>d) Did corrective actions permanently solve the conditions (Y/N)? <u>N/A</u></p> <p><b>Explain briefly:</b></p>	

10	22.423(b)(10) 22.522(a)(9) 22.619(b)(10)	Updated Financial Assurance documentation as required by Chapter 14. <i>Note: Include copy of most recent financial assurance documentation as Attachment D. Also, include updated closure and post closure cost estimated as an attachment– recommend to use the Closure Costs and Post-closure Care Costs Worksheet located at <u>ADEQ - Solid Waste - Technical Branch Home Page</u></i>	a) Size of the facility property under current permit? <u>14.7</u> acres b) Size of actual permitted disposal area? <u>12</u> acres c) What is the current total permitted disposal area that contains disposed waste but is not certified closed? <u>11.4</u> acres d) Updated closure cost estimate amount: \$ <u>1,485,257</u> e) Is the closure cost estimate based on the largest area ever requiring closure (Y/N)? <u>Y</u> f) Is the existing closure financial assurance adequate for acreage not yet certified closed (Y/N)?: <u>Y</u>	<b>D</b>
		<i>Specific links to the worksheets:</i> <a href="http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/closure_costs_worksheet.xlsx">http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/closure_costs_worksheet.xlsx</a> and <a href="http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/post_closure_care_costs_worksheet.xlsx">http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/post_closure_care_costs_worksheet.xlsx</a> . <i>Show detailed calculations of cost items in tabular format with specific item breakdowns. Also, show source of unit cost information and/or inflationary factor adjustments – use ADEQ factors where applicable. If updated unit cost information is used instead of inflationary factors, show the source of unit cost information. Confirm estimates are based on largest area ever requiring final cover.</i>	g) Updated post closure care cost estimate amount: \$ <u>98,280</u> h) Is the existing post closure care financial assurance adequate for all permitted areas (Y/N)?: <u>Y</u> i) Is the financial assurance mechanism a trust fund (Y/N)? <u>N</u> j) Are the sources of information for updated unit cost line items shown on the cost estimate calculations (Y/N?): <u>N</u> k) Do the unit cost items for soil cover material include actual third party cost of materials and labor (Y/N)? <u>Yes, cost assumes an onsite soil borrow area with plentiful suitable material just south of the Mill Trash Landfill, see assessment of this area in ADEQ Doc ID 78893</u>	
11	22.423(b)(11) 22.522(a)(10) 22.619(b)(11)	Revised or updated facility Closure Plan in accordance with Chapter 13. <i>Note: Provide updated Closure Plan as Attachment E if facility obtained a permit modification during the reporting period that affects the closure and/or post closure care.</i>	a) Was an updated Closure Plan required during this reporting period (Y/N)?: <u>N</u> b) Is an updated Closure Plan attached herein (Y/N)? <u>N</u>	

12	22.423(b)(12) 22.522(a)(11) 22.619(b)(12)	Other items that affect compliance. <i>Note: Include an ADEQ enforcement activity summary (solid waste, water, air, hazardous waste related) and, status of operating and permit fees. Also, include brief narrative concerning groundwater monitoring reports, landfill gas, leachate recirculation, alternate daily cover, etc...</i>	<p>a) Are there current ADEQ enforcement actions (Y/N)? <u>N</u></p> <p>b) Summary of enforcement actions: _____</p> <p>c) Are operating and permit fees payments up-to-date (Y/N)? <u>Y</u> If not explain: _____ Additional Information:</p> <p>d) Does the facility monitor groundwater (Y/N)? <u>Y</u> If so, is it detection monitoring or assessment monitoring? <u>_</u></p> <p><i>The current groundwater monitoring system for the three Domtar landfills, including Lime Waste Landfill is comprised of five (5) monitoring wells (MW-2, MW-3R, MW-4, MW-5, and MW-6). As of November 2017, monitoring wells MW-2, MW-5 and MW-6 are sampled under an Assessment Monitoring Program and wells MW-3R (upgradient) and MW-4 are sampled under Detection Monitoring.</i></p> <p>What is the groundwater analytical sampling frequency? <u>6</u> months</p>	
			<p>f) Does the facility collect landfill gas (Y/N)? <u>N</u></p> <p>g) Does the facility have a Gas Monitoring Plan (Y/N)? <u>N</u></p> <p>h) Does the facility have gas monitoring probes (Y/N)? <u>N</u></p> <p>i) Does the facility use an alternate daily cover (ADC) (Y/N)? <u>N</u> If so, what type of ADC is used: _____ If so, list document id# approving ADC: <u>62879</u></p> <p>j) Does the facility have a Liquid Waste Management (LWM) Plan (Y/N)? <u>N/A</u> If so, list document id# approving the LWM Plan: <u>N/A</u></p> <p>k) Date and document id # of currently approved Operating Plan and Narrative: Date: <u>June 30, 2024</u> Doc#: <u>81250</u></p> <p>l) Date and document id # for currently approved Closure/ Post Closure Plan: Date: <u>April 9, 1999</u> Doc#: <u>8591</u></p> <p>m) Date and document id # of currently approved Permit Drawings: Date: <u>April 9, 1999</u> Doc#: <u>8591</u></p> <p>n) Date and document id # of currently approved Design Narrative: Date: <u>April 9, 1999</u> Doc#: <u>8591</u></p>	
			<p>o) Are weigh scales utilized at the landfill (Y/N)? <u>N</u></p> <p>p) Does the final cap include a synthetic liner (Y/N)? <u>N</u></p>	

			<p>q) Does the final cap include clay liner (Y/N)? <u>Y</u>  r) Total current permitted landfill volume: <u>501,500</u> cubic yards</p>	
13	22.423(b) 22.522(a) 22.619(b)	Certification of AEIR Report: "I have inspected the landfill site and have prepared this report to reflect operational compliance with permit conditions, permit plans, specifications, narrative, and all applicable regulations"	<p>a) Arkansas Licensed Engineer:  Sign:  Date: <u>6/27/25</u>  b) License Number: <u>17690</u>  c) <i>Attach seal here:</i></p> <div style="display: flex; justify-content: space-around; align-items: center;">   </div>	

# Appendix A

## Photos

# Lime Waste LF - North and East Slopes



# Lime Waste LF – East Slope Looking North



# Lime Waste LF – Leachate Sump



# Lime Waste LF – Top Deck Looking North



# Lime Waste LF – Top Deck Looking South

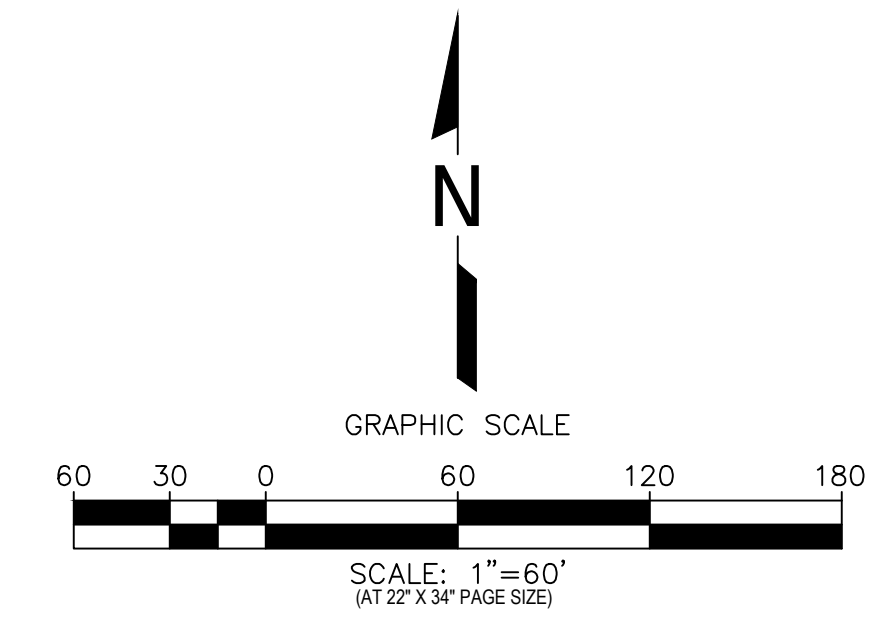
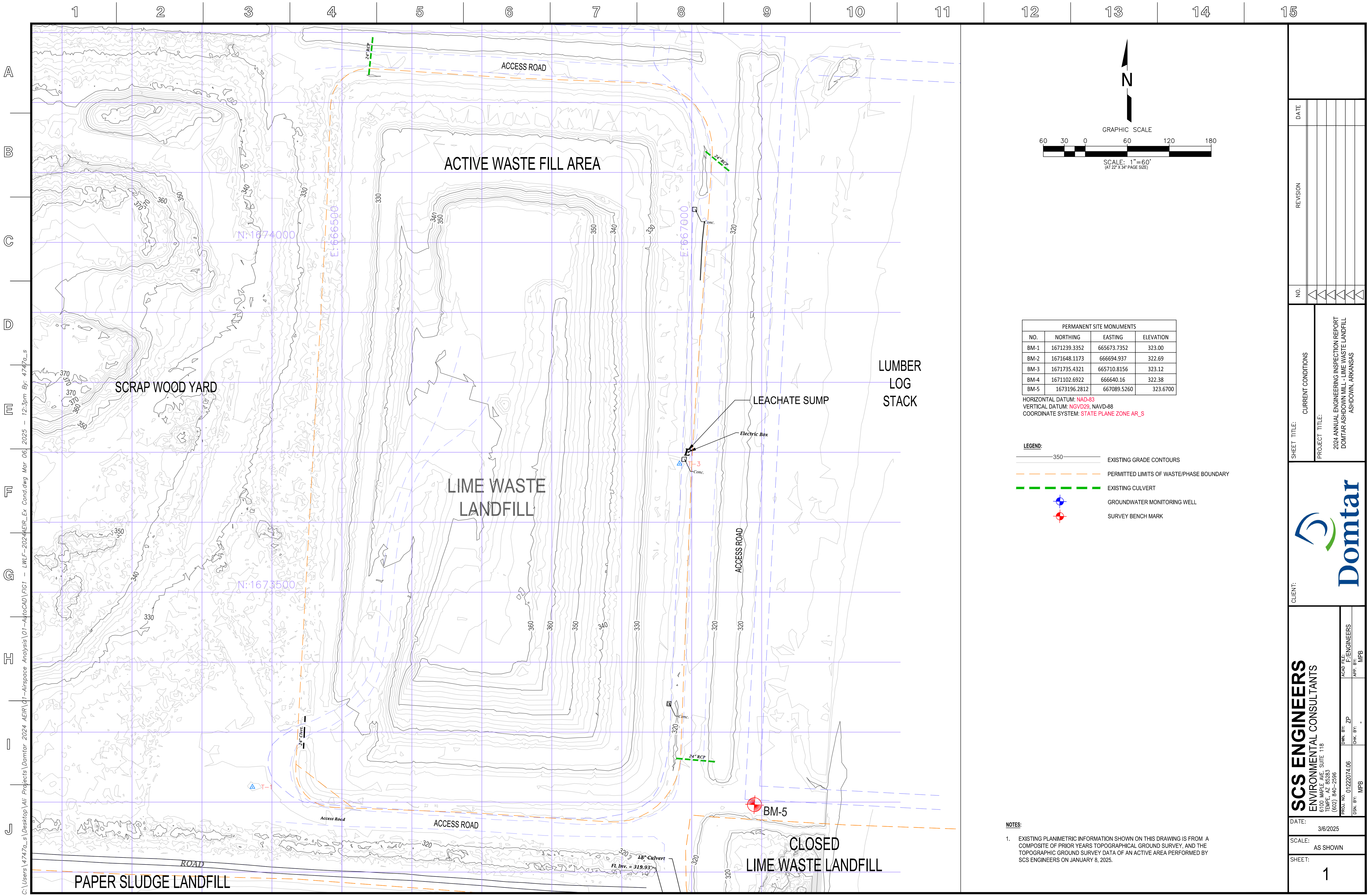


# Lime Waste LF – South Slope



## Appendix B

### Figures



PERMANENT SITE MONUMENTS			
NO.	NORTHING	EASTING	ELEVATION
BM-1	1671239.3352	665673.7352	323.00
BM-2	1671648.1173	666694.937	322.69
BM-3	1671735.4321	665710.8156	323.12
BM-4	1671102.6922	666640.16	322.38
BM-5	1673196.2812	667089.5260	323.6700

HORIZONTAL DATUM: NAD-83  
 VERTICAL DATUM: NGVD29, NAVD-88  
 COORDINATE SYSTEM: STATE PLANE ZONE AR\_S

- LEGEND:**
- 350 ——— EXISTING GRADE CONTOURS
  - PERMITTED LIMITS OF WASTE/PHASE BOUNDARY
  - EXISTING CULVERT
  - GROUNDWATER MONITORING WELL
  - SURVEY BENCH MARK

- NOTES:**
- EXISTING PLANIMETRIC INFORMATION SHOWN ON THIS DRAWING IS FROM A COMPOSITE OF PRIOR YEARS TOPOGRAPHICAL GROUND SURVEY, AND THE TOPOGRAPHIC GROUND SURVEY DATA OF AN ACTIVE AREA PERFORMED BY SCS ENGINEERS ON JANUARY 8, 2025.

NO.	REVISION	DATE

SHEET TITLE: CURRENT CONDITIONS  
 PROJECT TITLE:  
 2024 ANNUAL ENGINEERING INSPECTION REPORT  
 DOMTAR ASHDOWN MILL - LIME WASTE LANDFILL  
 ASHDOWN, ARKANSAS



**SCS ENGINEERS**  
 ENVIRONMENTAL CONSULTANTS  
 6100 MAPLE AVE. SUITE 118  
 TEMPE, AZ 85283  
 (602) 840-2596

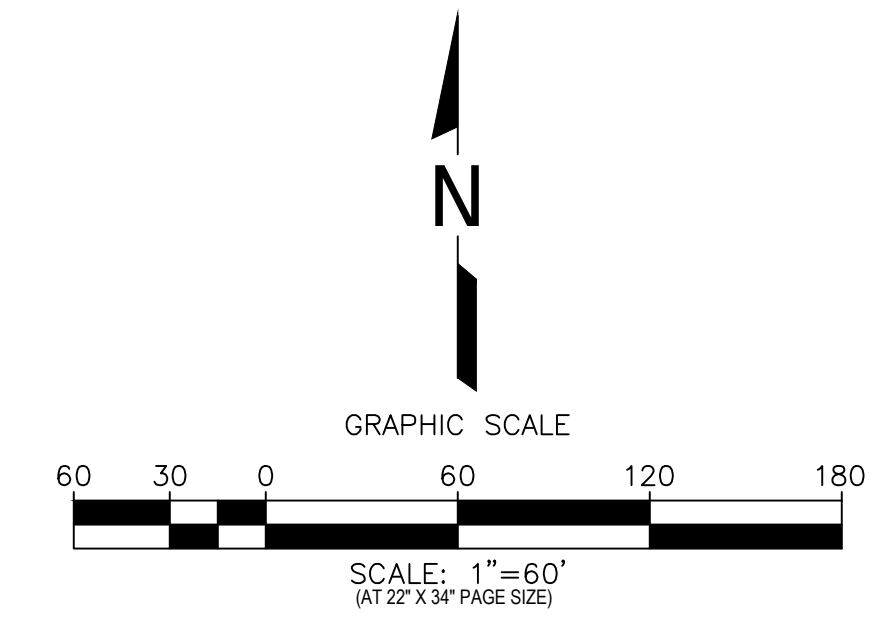
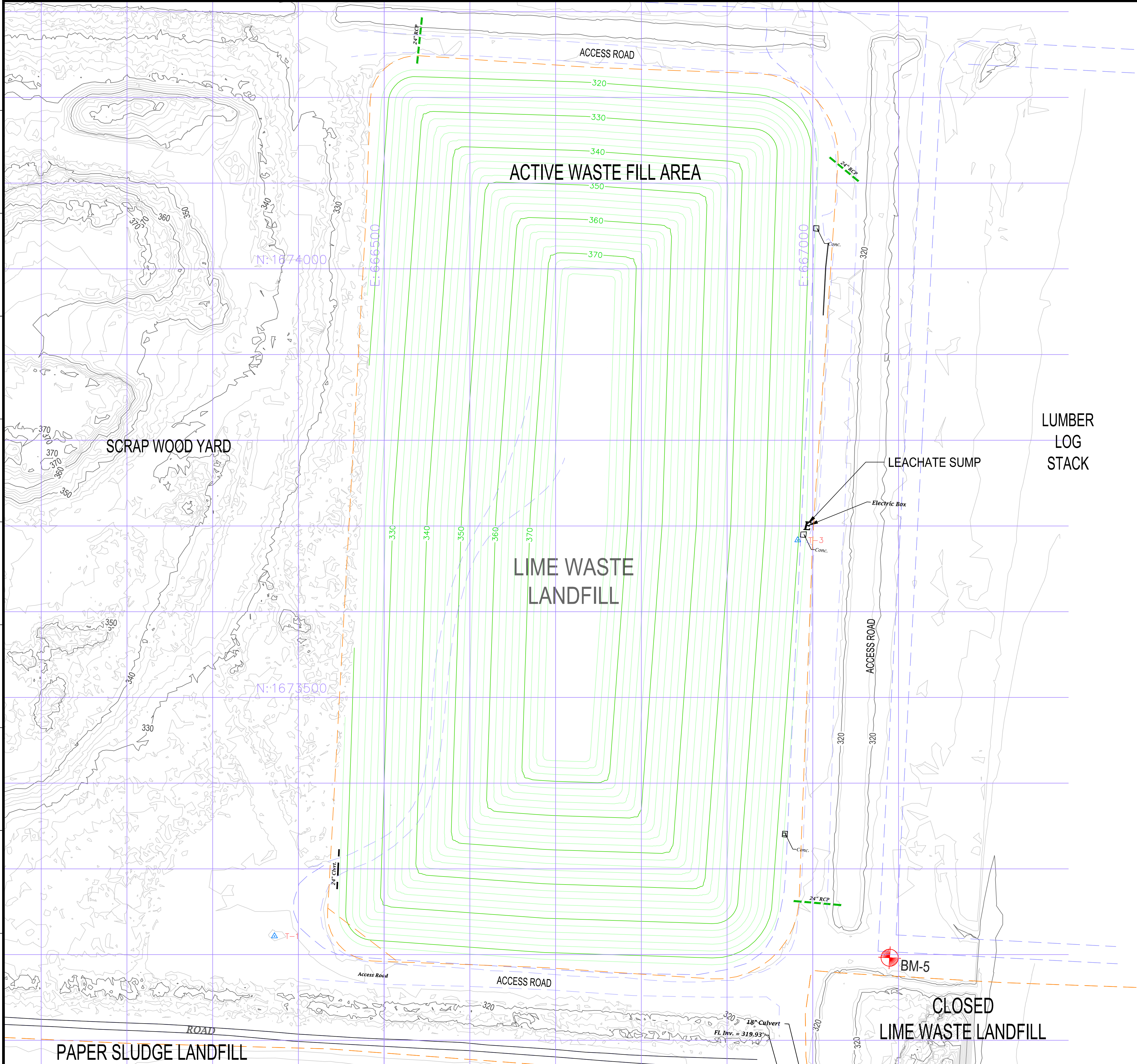
DATE: 3/6/2025  
 SCALE: AS SHOWN  
 SHEET: 1

ACAD FILE: F:\ENGINEERS  
 APP: B:\MPB  
 DWN: BY: ZP  
 CHK: BY: MPB  
 PROJ. NO: 01222074\_06

C:\Users\4747a...s\Desktop\Ari Projects\Domtar 2024 AER\01-Airspace Analysis\01-AirCAD\FIG1 - LWLF-2024\AER\_Ex Cond.dwg Mar 06, 2025 - 12:30pm By: 4747a...

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Y  
Z



PERMANENT SITE MONUMENTS			
NO.	NORTHING	EASTING	ELEVATION
BM-1	1671239.3352	665673.7352	323.00
BM-2	1671648.1173	666694.937	322.69
BM-3	1671735.4321	665710.8156	323.12
BM-4	1671102.6922	666640.16	322.38
BM-5	1673196.2812	667089.5260	323.6700

HORIZONTAL DATUM: NAD-83  
 VERTICAL DATUM: NGVD29, NAVD-88  
 COORDINATE SYSTEM: STATE PLANE ZONE AR\_S

- LEGEND:**
- 350 — EXISTING GRADE CONTOURS
  - 350 — PERMITTED TOP OF WASTE CONTOURS
  - - - - PERMITTED LIMITS OF WASTE/PHASE BOUNDARY
  - - - - EXISTING CULVERT
  - ⊕ GROUNDWATER MONITORING WELL
  - ⊙ SURVEY BENCHMARK

**NOTES:**

- EXISTING PLANIMETRIC INFORMATION SHOWN ON THIS DRAWING IS FROM A COMPOSITE OF PRIOR YEARS TOPOGRAPHICAL GROUND SURVEY, AND THE TOPOGRAPHIC GROUND SURVEY DATA OF AN ACTIVE AREA PERFORMED BY SCS ENGINEERS ON JANUARY 8, 2025.

NO.	REVISION	DATE


SHEET TITLE: PERMITTED TOP OF WASTE GRADE  
 PROJECT TITLE: 2024 ANNUAL ENGINEERING INSPECTION REPORT  
 DOMTAR ASHDOWN MILL - LIME WASTE LANDFILL  
 ASHDOWN, ARKANSAS



CLIENT: SCS ENGINEERS ENVIRONMENTAL CONSULTANTS  
 6100 MAPLE AVE. SUITE 118  
 TEMPE, AZ 85283  
 (602) 840-2596  
 PROJ. NO. 01222074\_06  
 DES. BY: MPB  
 CHK. BY: ZP  
 APP. BY: MPB

DATE: 3/6/2025  
 SCALE: AS SHOWN  
 SHEET: 2

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Appendix C  
Leachate Lab Results

# LIME LEACHATE

Collected date/time: 05/06/24 14:05

# SAMPLE RESULTS - 05

L1733461

## Gravimetric Analysis by Method 2540 C-2011

Analyte	Result	Qualifier	RDL	Dilution	Analysis	Batch
	ug/l		ug/l		date / time	
Dissolved Solids	62500000		10000	1	05/08/2024 14:33	<a href="#">WG2282386</a>

## Wet Chemistry by Method 353.2

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis	Batch
	ug/l		ug/l	ug/l		date / time	
Nitrate-Nitrite	U		2500	5000	50	05/13/2024 15:28	<a href="#">WG2285372</a>

### Sample Narrative:

L1733461-05 WG2285372: Dilution due to matrix interference

## Wet Chemistry by Method 410.4

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis	Batch
	ug/l		ug/l	ug/l		date / time	
COD	3050000		117000	200000	10	05/12/2024 18:57	<a href="#">WG2285069</a>

## Wet Chemistry by Method 4500S2 D-2011

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis	Batch
	ug/l		ug/l	ug/l		date / time	
Sulfide	1910		250	500	10	05/09/2024 16:00	<a href="#">WG2283451</a>

## Wet Chemistry by Method 9056A

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis	Batch
	ug/l		ug/l	ug/l		date / time	
Chloride	2920000	<u>B</u> <u>J</u>	1900000	5000000	5000	05/12/2024 07:21	<a href="#">WG2283297</a>
Fluoride	U		320000	750000	5000	05/12/2024 07:21	<a href="#">WG2283297</a>
Sulfate	8270000	<u>J</u>	2970000	25000000	5000	05/12/2024 07:21	<a href="#">WG2283297</a>

## Wet Chemistry by Method 9060A

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis	Batch
	ug/l		ug/l	ug/l		date / time	
TOC (Total Organic Carbon)	174000	<u>B</u>	10200	100000	100	05/09/2024 00:44	<a href="#">WG2282162</a>

## Metals (ICPMS) by Method 6020

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis	Batch
	ug/l		ug/l	ug/l		date / time	
Arsenic	257		1.80	20.0	10	05/18/2024 14:31	<a href="#">WG2287664</a>
Barium	123		3.81	20.0	10	05/18/2024 14:31	<a href="#">WG2287664</a>
Cadmium	U		1.50	10.0	10	05/18/2024 14:31	<a href="#">WG2287664</a>
Chromium	U		12.4	20.0	10	05/18/2024 14:31	<a href="#">WG2287664</a>
Iron	U		281	1000	10	05/18/2024 14:31	<a href="#">WG2287664</a>
Lead	U		8.49	20.0	10	05/18/2024 14:31	<a href="#">WG2287664</a>
Manganese	U		7.04	50.0	10	05/18/2024 14:31	<a href="#">WG2287664</a>

1 Cp

2 Tc

3 Ss

4 Cn

5 Sr

6 Qc

7 Gl

8 Al

9 Sc

Gravimetric Analysis by Method 2540 C-2011

Analyte	Result	Qualifier	RDL	Dilution	Analysis date / time	Batch
Dissolved Solids	82800000		1000000	1	11/27/2024 12:07	<a href="#">WG2409320</a>

Wet Chemistry by Method 353.2

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis date / time	Batch
Nitrate-Nitrite	U		435	2000	10	12/01/2024 23:22	<a href="#">WG2410990</a>

Sample Narrative:

L1804103-05 WG2410990: Dilution due to matrix.

Wet Chemistry by Method 410.4

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis date / time	Batch
COD	3870000		141000	200000	10	11/30/2024 14:26	<a href="#">WG2410562</a>

Wet Chemistry by Method 4500S2 D-2011

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis date / time	Batch
Sulfide	U		128	250	5	11/27/2024 12:52	<a href="#">WG2409562</a>

Sample Narrative:

L1804103-05 WG2409562: Dilution due to matrix

Wet Chemistry by Method 9056A

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis date / time	Batch
Chloride	U		2740000	5000000	5000	11/30/2024 20:46	<a href="#">WG2409502</a>
Fluoride	U		380000	750000	5000	11/30/2024 20:46	<a href="#">WG2409502</a>
Sulfate	8660000	J	3180000	25000000	5000	11/30/2024 20:46	<a href="#">WG2409502</a>

Sample Narrative:

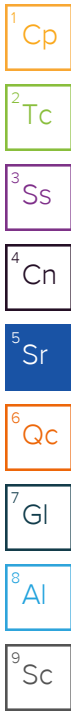
L1804103-05 WG2409502: Dilution due to matrix impact on instrumentation at lower dilution


Wet Chemistry by Method 9060A

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis date / time	Batch
TOC (Total Organic Carbon)	197000		49500	100000	100	12/07/2024 14:52	<a href="#">WG2414070</a>

Metals (ICPMS) by Method 6020B

Analyte	Result	Qualifier	MDL	RDL	Dilution	Analysis date / time	Batch
Arsenic	461		5.40	90.0	45	12/08/2024 18:58	<a href="#">WG2414321</a>
Barium	153		22.5	90.0	45	12/08/2024 18:58	<a href="#">WG2414321</a>
Cadmium	U		5.40	45.0	45	12/08/2024 18:58	<a href="#">WG2414321</a>
Chromium	U		40.5	90.0	45	12/08/2024 18:58	<a href="#">WG2414321</a>
Iron	U		1020	4500	45	12/08/2024 18:58	<a href="#">WG2414321</a>
Lead	U		22.5	90.0	45	12/08/2024 18:58	<a href="#">WG2414321</a>
Manganese	77.5	J	31.5	225	45	12/08/2024 18:58	<a href="#">WG2414321</a>





Appendix D  
Cost Estimate Updates



**CLOSURE COST ESTIMATE - 2024 AEIR**  
**Domtar Industries, Inc.**  
**Class 3N Lime Waste Landfill Permit No. 0296-S3N - AFIN: 41-00002**

ITEM	QUANTITY	UNIT	UNIT PRICE <sup>3</sup>	AMOUNT	SOURCE
Surface Preparation	12.0	AC	\$ 1,538.00	\$ 18,453.00	Average of Item 2 from the Paper Sludge Landfill Bid and Item 4 from the Little Rock Landfill Bid
Clay Cover (2-foot thick)	38,681	CY	\$ 6.73	\$ 260,270.00	Average of Item 2 of Paper Sludge Landfill Bid, Item 7 from the NEARS Landfill Bid, Item 5 of Little Rock Landfill Bid
Geocomposite Drainage Layer	58,080	SY	\$ 6.30	\$ 365,904.00	Average of item 11 from Little Rock Landfill Bid and Item 13.3 from Fulton, Arkansas Class 3N Landfill Bid
Protective Cover (12-inches thick)	19,341	CY	\$ 9.21	\$ 178,063.00	Average of Item 12 from Little Rock Landfill Bid and Item 6.4 from Fulton, Arkansas Class 3N Landfill bid
Vegetation/Soil Top Layer (min. 6-inches thick)	9,670	CY	\$ 17.94	\$ 173,518.00	Average of Item 13 from Little Rock Landfill bid and Item 3 from Paper Sludge Landfill bid
Seeding/Fertilizing/Mulching	12.0	AC	\$ 4,462.00	\$ 53,544.00	Average of Item 17 from NEARS Landfill bid, Item 8 Paper Sludge Landfill Bid, and Item 21 from Little Rock Landfill
Erosion Control	2	LS	\$ 7,500.00	\$ 15,000.00	Engineer's approximation
Mid-Slope Berms	1,350	CY	\$ 6.30	\$ 8,505.00	Average of Item 2 of Paper Sludge Landfill Bid, Item 7 from the NEARS Landfill Bid, Item 5 of Little Rock Landfill Bid
Let-Down Structures	1	LS	\$ 50,000.00	\$ 50,000.00	Engineer's Estimate
Engineering Quality Assurance/Quality Control <sup>1</sup>	1	LS	\$ 129,000.00	\$ 129,000.00	Engineer's Estimate
Surveying	1	LS	\$ 5,500.00	\$ 5,500.00	Engineer's Estimate
Certification	1	LS	\$ 4,500.00	\$ 4,500.00	Engineer's Estimate
<b>TOTAL<sup>2</sup></b>				<b>\$ 1,262,257.00</b>	

**Notes:**

- 1 - Includes Engineering, Permitting, CQA monitoring and CQA laboratory testing.
- 2 - Cost estimate is in 2020 dollars
- 3 - See "Source" Column for explanation of how Unit Price was derived

CLOSURE COST INFLATION ADJUSTMENT					
Year	2021	2022	2023	2024	2025
Implicit Price Deflator*	1.013	1.062	1.065	1.027	
<b>Adjusted Closure Cost Estimate</b>	<b>\$1,278,666</b>	<b>\$1,357,943</b>	<b>\$1,446,210</b>	<b>\$1,485,257</b>	

\*<https://www.adeq.state.ar.us/sw/permits/financial.aspx>



**POST-CLOSURE CARE COST ESTIMATE - 2024 AEIR**  
**Domtar Industries, Inc.**  
**Class 3N Lime Waste Landfill Permit No. 0296-S3N - AFIN: 41-00002**

<b>TABLE A</b>				
<b>ANNUAL REPAIRS AND STORMWATER SAMPLING</b>				
ITEM	QUANTITY	UNIT	UNIT PRICE <sup>5</sup>	AMOUNT
Skilled Labor (3 people x 8 hr/day x 10 days/yr)	240	Hours	\$ 22.00	\$ 5,280.00
Equipment- Dozer	40	Hours	\$ 143.25	\$ 5,730.00
Dump Truck	40	Hours	\$ 80.00	\$ 3,200.00
Loader	40	Hours	\$ 150.00	\$ 6,000.00
Mowing	32	Hours	\$ 55.00	\$ 1,760.00
Misc. Materials and Services <sup>1</sup>	2	LS	\$ 4,200.00	\$ 4,200.00
<b>TOTAL ESTIMATED ANNUAL REPAIRS AND STORMWATER SAMPLING</b>				<b>\$ 26,170.00</b>
<b>TABLE B</b>				
<b>ANNUAL MAINTENANCE/OPERATION OF LEACHATE COLLECTION SYSTEM</b>				
ITEM	QUANTITY	UNIT	UNIT PRICE	AMOUNT
Annual Maintenance and Repair of System <sup>1</sup>	1	LS	\$ 6,000.00	\$ 6,000.00
Annual Transportation Costs <sup>3</sup>	175,000	GAL	\$ 0.01	\$ 963.00
Annual Treatment Costs <sup>4</sup>	175,000	GAL	\$ 0.01	\$ 963.00
<b>TOTAL ESTIMATED ANNUAL LEACHATE SYSTEM O&amp;M</b>				<b>\$ 7,925.00</b>
<b>TABLE C</b>				
<b>ANNUAL MAINTENANCE/OPERATION OF GROUNDWATER MONITORING SYSTEM</b>				
ITEM	QUANTITY	UNIT	UNIT PRICE	AMOUNT
Annual Maintenance and Repair <sup>9</sup>	1	LS	\$ 1,667.00	\$ 1,667.00
Annual Groundwater Monitoring Services (3rd Party) <sup>9</sup>	1	LS	\$ 6,000.00	\$ 6,000.00
<b>TOTAL ESTIMATED ANNUAL GW MONITORING SYSTEM COSTS</b>				<b>\$ 7,667.00</b>
<b>TOTAL ESTIMATED ANNUAL POST-CLOSURE CARE COSTS:</b>				<b>\$ 41,762.00</b>
<b>TOTAL ESTIMATED POST-CLOSURE CARE COSTS (2-YEAR PERIOD <sup>7,8</sup>):</b>				<b>\$ 83,524.00</b>

**NOTES:**

N/A = Not Applicable

- 1 - Assumes worst case scenarios the pump system will require replacement 1 time during the 2-year post closure period.
- 2 - Cost includes electricity to pump leachate to wastewater treatment pond located on facility property.
- 3 - Collected leachate will be pumped to the facility wastewater treatment system.
- 4 - Treatment costs are absorbed into the facility treatment system costs and do not apply.
- 5 - Unit Prices are taken from 2018 pricing sheet provided by Domtar's third party contracted landfill operator, Smith Equipment Co.
- 6 - Facility design does not include Gas Monitoring System.
- 7 - Post-Closure Care period is two years.
- 8 - Cost estimate is in 2020 dollars

<b>POST-CLOSURE COST INFLATION ADJUSTMENT</b>					
Year	2021	2022	2023	2024	2025
<b>Implicit Price Deflator*</b>	1.013	1.062	1.065	1.027	
<b>Adjusted Closure Cost Estimate</b>	\$84,610	\$89,856	\$95,696	\$98,280	

\*<https://www.adeg.state.ar.us/sw/permits/financial.aspx>