David Isaacs

From: Bradford, Michael <MBradford@scsengineers.com>
Sent: Wednesday, 14 October, 2026 11:41 AM
To: David Isaacs
Cc: charles.allen@domtar.com
Subject: Re: DEQ - Domtar AEIR's

CAUTION: External Email

Hi David,

See attached files at this link: https://www.dropbox.com/scl/fo/7x66anxph4rw3yi8jt2z6/AEbUB__hWlpLGPpFcgu-32Y?rlkey=a4f2sl1y5dryaprgm310cr0cf&st=unu6ny44&dl=0

1. 2023_MTLF AEIR_FINAL.PDF, Revised 2023 Mill Trash Landfill AEIR with Permit Number Corrected in top line.
2. 2023_PSLF AEIR_FINAL.PDF, Revised 2023 Paper Sludge Landfill AEIR with Permit Number Corrected in top line
3. 2026-10-14_Domtar_2025_LWLF AEIR V2.0.pdf, updated form and Closure/post closure costs
4. 2026-10-14_Domtar_2025_PSLF AEIR V2.0.pdf, updated form and Closure/post closure costs
5. 2026-10-14_Domtar_2025_MTLF AEIR V2.0.pdf, updated form and Closure/post closure costs

Let me know if you need anything else.

Thanks,

Michael Bradford, P.E.
M: 602-826-9398
O: 602-606-4553
SCS ENGINEERS

From: David Isaacs <David.Isaacs@arkansas.gov>
Sent: Thursday, September 17, 2026 11:59 AM
To: Bradford, Michael <MBradford@scsengineers.com>
Cc: charles.allen@domtar.com <charles.allen@domtar.com>
Subject: RE: DEQ - Domtar AEIR's

This email originated from outside of SCS Engineers. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Yes, 30 days would be fine.

Thank you –

David Isaacs
Engineer
E&E | Environmental Quality | Land Resources
e: david.isaacs@arkansas.gov
t: 501-682-0706

From: Bradford, Michael <MBradford@scsengineers.com>
Sent: Thursday, 17 September, 2026 12:28 PM
To: David Isaacs <David.Isaacs@arkansas.gov>
Cc: charles.allen@domtar.com
Subject: Re: DEQ - Domtar AEIR's

CAUTION: External Email

Received thank you.

I can certainly return the fixed 2023 reports within the 10-days. But I will need 30-days to return the fully updated closure and post closure cost estimates for each site.

Is this acceptable?

Michael Bradford, P.E.
M: 602-826-9398
O: 602-606-4553
SCS ENGINEERS

From: David Isaacs <David.Isaacs@arkansas.gov>
Sent: Thursday, September 17, 2026 9:55 AM
To: Bradford, Michael <MBradford@scsengineers.com>
Cc: charles.allen@domtar.com <charles.allen@domtar.com>
Subject: DEQ - Domtar AEIR's

This email originated from outside of SCS Engineers. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

Follow up email for our phone call this morning.

Regarding AEIR's for:

0211-S3N-R2

- Needs new cost estimate in 2026 dollars (the current estimate has already been inflated 5 times and is reported in 2025 dollars). Please submit a revised 2025 report with corrected values and new cost estimates.

- 2023 report (85638) appears to be jumbled with the 2023 report for 0244… Please provide a corrected version of the 2023 report.

0244-S3N-R1

- Needs new cost estimate in 2026 dollars (the current estimate has already been inflated 5 times and is reported in 2025 dollars). Please submit a revised 2025 report with corrected values and new cost estimates.
- 2023 report (85637) appears to be jumbled with the 2023 report for 0211… Please provide a corrected version of the 2023 report.

0296-S3N

- Needs new cost estimate in 2026 dollars (the current estimate has already been inflated 5 times and is reported in 2025 dollars). Please submit a revised 2025 report with corrected values and new cost estimates.

I have attached the cost estimate worksheets.

Please provide a response to the above issues in the next 10 business days, if you need additional time please let me know.

Thank you –

David Isaacs
Engineer
E&E | Environmental Quality | Land Resources
e: david.isaacs@arkansas.gov
t: 501-682-0706

ANNUAL ENGINEERING INSPECTION REPORT (AEIR) FORM Reporting Year: 2025

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, 2026 Date of Landfill Site Inspection by Certifying Engineer: April 29, 2026

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) ~133,219 cubic yards ***(as of 01/08/26)*** *NOTE: ~141 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.*	
		Projected date of opening new cell.	b) Date: n/a	
2	22.423(b)(2) 22.522(a)(2) 22.619(b)(2)	Remaining volume of all permitted units.	a) ~133,219 cubic yards	
		Total air space used during the reporting period.	b) ~ 512 *CY of waste placed based on trucking records provided by Paper Mill Staff.*	
		Estimated remaining site life (years) based on utilization rate during the reporting period. ***Note: Itemize current permitted unit/cell information - use attachment if necessary.***	c) Landfill Unit/Cell remaining life: Landfill unit/cell Lime Waste Landfill , 415 years. d) Entire permitted landfill: 415 years remaining life. *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.*	

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. ***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.***	a) Progression Narrative: *The Lime Waste Landfill is approximately 72% full. The Landfill is generally filled on the north deck area when utilized.. 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 2025 reporting period.*	
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. ***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.***	a) Weekly/monthly operational logs exist (Y/N)? Y b) Photos of AEIR inspection attached (Y/N)? Y c) Waste volume in and out records exist (Y/N)? Y d) Unauthorized waste forms exist (Y/N)? Y e) Daily/weekly cover adequate at time of inspection (Y/N)? N/A f) Alternative Daily Cover (ADC) Plan located onsite (Y/N)? N/A Operations in compliance with ADC Plan (Y/N)? N/A g) Liquid Waste Management (LWM) Plan located onsite (Y/N)? N/A Operations in compliance with LWM Plan (Y/N)? N/A h) Liquids received to be bulked during reporting period: N/A gallons N/A tons i) Waste cover of inactive areas maintained adequately (Y/N)? N/A j) Net amount of waste disposed in landfill during reporting period: 512* cubic yards _____ tons **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.* k) Leachate head level less than 1' on liner at time of inspection (Y/N)? Y	**A**
5	22.423(b)(5) 22.522(a)(5) 22.619(b)(5)	Updated contour map that depicts: ***Note: Provide updated drawing(s) and final cover permit drawing as Attachment B – discuss any discrepancies. Max. contour interval = 2 feet)***	a) Updated contour drawing attached (Y/N)? Y b) Final cover permit drawing attached (Y/N)? Y c) ***List all discrepancies here:*** No discrepancies to report this period. d) Is there an overfill condition (Y/N)? N	**B**

		(i) horizontal and vertical extent of active and inactive fill areas;		
		(ii) status of all permitted units/cells; ***(Note: Label all active (working face, bulking area, stockpiles), inactive, closed and interim cover areas)***.	*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)? *Yes,* *See onsite soil analysis provided to ADEQ under ADEQ DOC ID 78893.* b) If not, where will deficiency shortfalls be obtained (be specific)? _____ _____ c) Is the current Design Narrative earthwork balance accurate (Y/N)? Y	
		(iii) survey grid (required by 22.426); ***Note: Include benchmarks and horizontal controls***		
		(iv) location of other visible surface features or improvements (e.g., roads, buildings, gas control systems, etc.); ***Note: Include leachate risers, manholes, monitoring wells, gas wells, etc.***		
		(v) the person responsible for gathering the survey data and the date survey data was taken to prepare the map. *Reminder: Reporting period is calendar year. Survey data should be collected to reflect the AEIR reporting period.*	a) Name: SCS Engineers, b) Name of person using the data to produce contour map: Tyler Warren, P.E. c) Date survey data was collected: 1/8/26	
6	22.423(b)(6) 22.522(a)(6) 22.619(b)(6)	Quantity, location, and characteristics of leachate collected, recirculated, and disposed. ***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.***	a) Leachate Collected: 488,400 gallons b) Leachate Disposed: 488,400 gallons c) Leachate Recirculated: N/A gallons d) Leachate Recirculation Plan exists (Y/N)? N/A ADEQ approval Doc # N/A e) Leachate operating records exist (Y/N)? Y *f)* Leachate analytical report attached (Y/N)? *Y* g) Leachate narrative (collection, measurements and disposal):	C

			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. h) Leachate narrative (verifying <1' head on liner system): *The Lime Waste Landfill leachate pump station was in good condition and operational 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.*	
7	22.423(b)(7) 22.522(a)(7) 22.619(b)(7)	Maintenance of stormwater controls and best management practices for erosion control. ***Note: List any upset conditions during the reporting period (i.e., washouts, etc…). Also, include narrative about vegetation maintenance and repair.***	a) ***Briefly list maintenance activities and upset conditions here:*** *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.*	
8	22.423(b)(8) 22.619(b)(8)	Status of capping and closure of completed areas. ***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.***	a) Lndfl unit/cell_____,_____acres. Intrm or Final Cover (I/F): ____ b) Lndfl unit/cell_____,_____acres. Intrm or Final Cover (I/F): ____ c) Lndfl unit/cell_____,_____acres. Intrm or Final Cover (I/F): ____ d) Lndfl unit/cell_____,_____acres. Intrm or Final Cover (I/F): ____ e) Acres of disposed waste not under final certified cover: 11.4 acres f) Acres of disposed waste area that have interim cover: 0 acres ** Lime Waste Landfill is not required to place routine or intermediate cover. All slopes are below final waste grade at this time.*	
9	22.423(b)(9) 22.522(a)(8) 22.619(b)(9)	Status of remedial or corrective action activities. ***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.***	***a) Briefly list corrective actions events here:*** ADEQ performed routine quarterly inspections on 2/20/25, 4/24/25, 8/6/25, and 10/27/25. The ADEQ inspector in each case concluded each inspection with no observed allegations of noncompliance. b) Were any of the corrective actions taken in response to an ADEQ inspection (Y/N)? N/A c) Current status of corrective actions: N/A d) Did corrective actions permanently solve the conditions (Y/N)? N/A ***Explain briefly:***	

10	22.423(b)(10) 22.522(a)(9) 22.619(b)(10)	Updated Financial Assurance documentation as required by Chapter 14. ***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>***	a) Size of the facility property under current permit? 14.7 acres b) Size of actual permitted disposal area? 12 acres c) What is the current total permitted disposal area that contains disposed waste but is not certified closed? 11.4 acres d) Updated closure cost estimate amount: $ 1,551,411 e) Is the closure cost estimate based on the largest area ever requiring closure (Y/N)? Y f) Is the existing closure financial assurance adequate for acreage not yet certified closed (Y/N)?: Y	**D**
		Specific links to the worksheets: <u>http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/closure_costs_worksheet.xlsx</u> ***and*** <u>http://www.adeq.state.ar.us/solwaste/branch_technical/pdfs/post_closure_care_costs_worksheet.xlsx</u>***. . 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.***	g) Updated post closure care cost estimate amount: $ 109,884.95 h) Is the existing post closure care financial assurance adequate for all permitted areas (Y/N)?: Y i) Is the financial assurance mechanism a trust fund (Y/N)? N j) Are the sources of information for updated unit cost line items shown on the cost estimate calculations (Y/N?): N k) Do the unit cost items for soil cover material include actual third party cost of materials and labor (Y/N)? *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*	
11	22.423(b)(11) 22.522(a)(10) 22.619(b)(11)	Revised or updated facility Closure Plan in accordance with Chapter 13. ***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.***	a) Was an updated Closure Plan required during this reporting period (Y/N)?: N b) Is an updated Closure Plan attached herein (Y/N)? N	

12	22.423(b)(12) 22.522(a)(11) 22.619(b)(12)	Other items that affect compliance. ***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…***	a) Are there current ADEQ enforcement actions (Y/N)? N b) Summary of enforcement actions: _____ c) Are operating and permit fees payments up-to-date (Y/N)? Y If not explain: _____ Additional Information: d) Does the facility monitor groundwater (Y/N)?: Y If so, is it detection monitoring or assessment monitoring?: *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.* What is the groundwater analytical sampling frequency? 6 months	
			f) Does the facility collect landfill gas (Y/N)?: N g) Does the facility have a Gas Monitoring Plan (Y/N)? N h) Does the facility have gas monitoring probes (Y/N)? N i) Does the facility use an alternate daily cover (ADC) (Y/N)? N If so, what type of ADC is used: _____ If so, list document id# approving ADC: 62879 j) Does the facility have a Liquid Waste Management (LWM) Plan (Y/N)? N/A If so, list document id# approving the LWM Plan: N/A *k)* Date and document id # of currently approved Operating Plan and Narrative: Date: June 30, 2024 Doc#: *81250* *l)* Date and document id # for currently approved Closure/ Post Closure Plan: Date: April 9, 1999 Doc#: *8591* m) Date and document id # of currently approved Permit Drawings: Date: April 9, 1999 Doc#: *8591* n) Date and document id # of currently approved Design Narrative: Date: April 9, 1999 Doc#: *8591* o) Are weigh scales utilized at the landfill (Y/N)? N p) Does the final cap include a synthetic liner (Y/N)? N	

			q) Does the final cap include clay liner (Y/N)? Y r) Total current permitted landfill volume: 501,500 cubic yards	
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"	a) Arkansas Licensed Engineer: Sign:_____ Date: b) License Number: 17690 ***c) Attach seal here:***   	

LANDFILL CLOSURE - COST ESTIMATE WORKSHEET

OWNER: Domtar Ashdown Mill	PERMIT No.: 0296-S3N			AFIN No.: 41-00002
OPERATOR: Domtar Ashdown Mill	ESTIMATOR: Michael Bradford (Ark. Licensed P.E. #: 17690)			DATE: 10/9/26
TOTAL PERMITTED WASTE DISPOSAL ACRES: 11.4 Acres				
TOTAL PERMITTED ACRES CERTIFIED CLOSED: 0 Acres	ACRES CURRENTLY OPEN: 11.4 Acres (i.e., "open" means areas subject to regulation and have not been certified closed)			
LARGEST ACREAGE EVER REQURING FINAL COVER OVER ACTIVE LANDFILL LIFE: 11.4 Acres (i.e., largest acreage ever open at any one time; NOTE: if approved Closure Plan does not include phased closure then largest area is the total permitted disposal acres)				

LANDFILL CLOSURE COST ESTIMATE WORKSHEET — Permit: 0296-S3N — AFIN: 41-00002

ITEM No.	ITEM	QUANTITY	UNITS	UNIT COST	COST	SUBTOTALS	SOURCE OF UNIT COST INFO
1.0.0	**PROFESSIONAL SERVICES**						
1.1.0	Engineering (Design, Bid Documents, Procurement, Construction Contract Mangement)	1	Lump Sum	$40,000.00	$ 40,000		Engineer's esimtate based on similar projects performed in past 3-years
1.2.0	Topographic and Boundary Survey	1	Lump Sum	$30,000.00	$ 30,000		Engineer's esimtate based on similar projects performed in past 3-years
1.3.0	Engineering Services (Construction Oversight, Testing, Reporting, Certification)	1	Lump Sum	$260,000.00	$ 260,000		Engineer's esimtate based on similar projects performed in past 3-years
	Professional Services Subtotal					$ 330,000	
2.0.0	**FINAL COVER**						
2.1.0	**Low Permeability Soil Layer**						
2.1.1	Preparation of landfill to receive cover (final grading)	11.4	ACRE	$1,548.81	$ 17,656		RS Means 312216103310 - Fine grading, slopes, steep, finish grading
2.1.2	Clay, On-Site (excavate, transport, place, compact) (Quantity must match earthwork balance and must be garanteed for future availability)	38,700	CU. YD.	$5.15	$ 199,305		RS Means 312323144440 - Structural Clay Backfill with a 200 HP Dozer and RS Means 354113200200 - Compaction of clay material in an open, sloped area for 6 passes
2.1.3	Clay, Off-site (excavate, transport, place, compact) (Quantity must match earthwork balance)	N/A	CU. YD.				
	Low Permeability Soil Layer Subtotal					$ 216,961	
2.2.0	**Geomembrane and Drainage Layer**						
2.2.1	Drainage material--sand	N/A	CU. YD.				
2.2.2	Drainage material--geogrid	58100	SQ. YD.	$8.55	$ 496,755		Engineers estimate based on multiple landfill cell and closure construction projects in 2026 using geocomposite drainage layer.
2.2.3	Geomembrane	N/A	SQ. YD.				
	Geomembrane and Drainage Layer Subtotal					$ 496,755	
2.3.0	**Protective Soil and Vegetative Layer**						
2.3.1	Protective Soil, On-site (excavate, transport, place, compact) (Quantity must match earthwork balance and must be garanteed for future availability)	19350	CU. YD.	$5.15	$ 99,653		Assumed $5.15/CY for earthworkd as shown on Item 2.1.2. Cover system calls for 12-inches of protective cover soil, previous closure have used same souce as Item 2.1.2 and place in two 6-inch loose lifts and lightly compacted.
2.3.2	Protective Soil, Off-site (excavate, transport, place, compact) (Quantity must match earthwork balance)	N/A	CU. YD.				
2.3.3	Vegetative Soil (Topsoil), On-site (excavate, transport, place) (Quantity must match earthwork balance and must be garanteed for future availability)	9700	CU. YD.	$5.15	$ 49,955		Assumed $5.15/CY for earthworkd as shown on Item 2.1.2. Cover system calls for 6-inches of vegetated soil, previous closure have used same souce as Item 2.1.2 and place in 1 loose lift then hydroseeded. Hydroseeding included in Item 2.3.5
2.3.4	Vegetative Soil (Topsoil), Off-site (excavate, transport, place) (Quantity must match earthwork balance)	N/A	CU. YD.				
2.3.5	Seeding and mulching	11.4	ACRE	$4,500.00	$ 51,300		Engineer's esimtate based on similar projects performed in past 3-years for Hydroseeding.
2.3.6	Fertilizer	N/A	ACRE				
	Protective Soil and Vegetative Layer Subtotal					$ 200,908	
3.0.0	**EROSION CONTROL**						
3.1.0	Terraces and letdowns	2210	Lin. FT.	$75.00	$ 165,750		
3.2.0	Checkdams and filters	N/A	Lin. FT.				
3.3.0	Grass ditching/channels	NA	Lin. FT.				Already constructed
3.4.0	Riprap ditching/channels	N/A	Lin. FT.				
	Erosion Control Subtotal					$ 165,750	
4.0.0	**GAS SYSTEM**						
4.1.0	Gas vents, _____# of vents, _____ average depth	N/A	Lin. FT.				
4.2.0	**Passive System**	N/A					
4.2.1	Passive well head flare	N/A	EACH				
4.3.0	**Active System**	N/A					

LANDFILL CLOSURE COST ESTIMATE WORKSHEET — Permit: 0296-S3N — AFIN: 41-00002

ITEM No.	ITEM	QUANTITY	UNITS	UNIT COST	COST	SUBTOTALS	SOURCE OF UNIT COST INFO
4.3.1	Flare, ___ BTU/hour	N/A	EACH				
4.3.2	Additonal Well Installation	N/A	EACH				
4.3.4	Ancillary gas equipment (piping, blowers, condensate collection)	N/A	Lump Sum				
	Gas System Subtotal					$ -	
5.0.0	**GROUNDWATER MONITORING SYSTEM**						
5.1.0	Well installation	N/A	EACH				
5.2.0	Upgrade existing wells	N/A	EACH				
5.3.0	Dedicated pump/sampling system installation/upgrade	N/A	EACH				
5.4.0	Baseline sample collection (4 events per first year, _____ samples per event)	N/A	EVENT				
5.5.0	Baseline sample analysis and reporting (4 events per first year, _____ samples per event))	N/A	EVENT				
	Groundwater Monitoring System Subtotal					$ -	
6.0.0	**LEACHATE COLLECTION SYSTEM**						
6.1.0	Additional/upgrades for collection piping	N/A	Lin. FT				
6.2.0	Additonal/upgrades to pumps	N/A	EACH				
6.3.0	Additional/upgrades to storage containers	N/A	EACH				
6.4.0	Baseline sample collection	N/A	EACH				
6.5.0	Baseline sample analysis and reporting	N/A	EACH				
	Leachate Collection System Subtotal					$ -	
7.0.0	**OPERATIONS AND INVENTORY REMOVAL**						
7.1.0	Excess solid waste	N/A	CU. YD.				
7.2.0	Mobile equipment/machinery (e.g., containers, tanks, etc...)	N/A	Lump Sum				
7.3.0	Stored leachate	N/A	GAL.				
7.4.0	Contaminated soils	N/A	CU. YD.				
	Operations and Inventory Removal Subtotal					$ -	
8.0.0	**DEMOLITION/REMOVAL SITE IMPROVEMENTS**						
8.1.0	Office/shop/maintenace and other ancillary buildings	N/A	Lump Sum				
8.2.0	Equipment to be decommisioned (e.g., weigh scales, bulking/solidification pits, collection pits/sumps, piping, etc...)	N/A	Lump Sum				
8.3.0	Site Utilities	N/A	Lump Sum				
	Demolition/Removal Site Improvements Subtotal					$ -	
9.0.0	**REPLACE/REBUILD SITE ACCESS CONTROLS**						
9.1.0	Fencing	N/A	Lin. FT.				
9.2.0	Gates	N/A	EACH				
9.3.0	Access barriers	N/A	EACH				
9.4.0	Other security equipment	N/A	Lump Sum				
	Replace/Rebuild Site Access Controls Subtotal					$ -	
10.0.0	**BORROW AREA RECLAMATION**						
10.1.0	Regrade and site prep	N/A	ACRE				
10.2.0	Soil, On-site (excavate, transport, place, compact)	N/A	CU.YD.				
10.3.0	Soil, Off-site (excavate, transport, place, compact)	N/A	CU. YD.				
10.4.0	Seeding and mulching	N/A	ACRE				
10.5.0	Fertilizer	N/A	ACRE				
	Borrow Area Reclamation Subtotal					$ -	
					Total Closure Cost Subtotal	$ 1,410,374	
11.0.0	**MISCELLANEOUS**						
11.1.0	10% Administration and Contingency (Total Closure Cost Subtotal x 10%)				$ 141,037		
	Misc. Subtotal					$ 141,037	
					TOTAL CURRENT CLOSURE COST	$ 1,551,411	

LANDFILL POST CLOSURE CARE - ANNUAL COST ESTIMATE WORKSHEET

OWNER: Domtar Ashdown Mill	PERMIT No.: 0296-S3N			AFIN No.: 41-00002
OPERATOR: Domtar Ashdown Mill	ESTIMATOR: Michael Bradford (Ark. Licensed P.E. #: 17690)			DATE: 10/9/26
TOTAL PERMITTED WASTE DISPOSAL ACRES: 11.4 Acres				
TOTAL PERMITTED ACRES CERTIFIED CLOSED: 0 Acres				

LANDFILL POST CLOSURE COST ESTIMATE WORKSHEET — Permit: 0296-S3N — AFIN: 41-00002

ITEM No.	ITEM	QUANTITY	UNITS	UNIT COST	COST	SUBTOTALS	SOURCE OF UNIT COST INFO
1.0.0	**PROFESSIONAL SERVICES**						
1.1.0	Engineering (Annual inspection and reporting, corrective action design and bid, contract management)	1	Lump Sum	$4,300.00	$4,300.00		Current cost for service provided by SCS Engineers.
1.2.0	Topographic and Boundary Survey (annual, final, and corrective action, if required)		Lump Sum				Included in 1.1.0
1.3.0	Corrective Action Engineering Services (Construction Oversight, Testing, Reporting, Certification)	N/A	Lump Sum				no corrective action items identified at this time
	Professional Services Annual Subtotal					$4,300.00	
2.0.0	**FINAL COVER ROUTINE MAINTENANCE**						
2.1.0	Inspect soil cover, vents, flares, drainage letdowns and outfalls, etc...	2	Event	$1,500.00	$3,000.00		Assumes 4-hours of labor for a Professional @ $250/hour and $500 for summary memo.
2.2.0	Mowing/Trimming (33.9 acres twice per year)	3	Event	$2,500.00	$7,500.00		Provided by Domtar Mill for actual current cost to mow landfill by Pickett Industries
2.3.0	Clean Drain/Vent Openings	N/A	Event				
	Final Cover Routine Maintenance Annual Subtotal					$10,500.00	
3.0.0	**FINAL COVER REPAIRS**						
3.1.0	Remove/incorporate unacceptable materials (e.g., dead vegetation, solid waste)	11.4	ACRE	$330.00	$3,762.00		RS Means 019306400340 - General cleaning, remove trash to central location, assumes 1 CY of loose waste @ 300 lb/CY per acre is generated.
3.2.0	Scarify and prepare surface	1	ACRE	$1,548.81	$1,548.81		RS Means 312216103310 - Fine grading, slopes, steep, finish grading
3.3.0	Soil, On-Site (excavate, transport, place, compact)	100	CU. YD.	$5.15	$515.00		Assume 100-CY per acre needed for repairs @ 1-acres needing repair per year, RS Means 312323144440 - Structural Clay Backfill with a 200 HP Dozer and RS Means 354113200200 - Compaction of clay material in an open, sloped area for 6 passes
3.4.0	Soil, Off-site (excavate, transport, place, compact)		CU. YD.				
3.5.0	Seeding and mulching	1	ACRE	$4,500.00	$4,500.00		Engineer's esimtate based on similar projects performed in past 3-years for Hydroseeding.
3.6.0	Fertilizer		ACRE				
	Final Cover Repairs Annual Subtotal					$10,325.81	
4.0.0	**ACCESS ROADS REPAIRS**						
4.1.0	Reshape/regrade subgrade	N/A	SQ. YD.				Completed as part of routine Mill operation and maintenance
4.2.0	Gravel (transport, place, compact)	N/A	TON				Gravel no placed at landfill roads
4.3.0	Drainage Structures (e.g., culverts,	1000	Lin. FT.	$10.75	$10,750.00		Assume 1000 LF per year require repair, engineer's estimate based on other projects.
4.4.0	Riprap ditching/channels	N/A	Lin. FT.				Channels are naturally grass lined.
	Access Roads Repair Annual Subtotal					$10,750.00	
5.0.0	**SURFACE WATER MANAGEMENT OPERATION AND MAINTENANCE (O&M)**						
5.1.0	Collection system operation and maintenance (ditches, piping conveyances, outfalls, sampling points repair/replace)	N/A	Lump Sum				Assumed to be included with Section 3.0.0
5.2.0	Stormwater storage (sediment pond) operation/repairs	N/A	Lump Sum				All mill stormwater is conveyed to onsite lagoons which are operated and maintained as part of Mill operations.
5.3.0	Samplie collection (___ events per year)	N/A	Event				All mill stormwater is conveyed to
5.4.0	Sample analysis and reporting (___ events per year)	N/A	Event				All mill stormwater is conveyed to onsite lagoons which are operated and maintained as part of Mill operations.
	Surface Water Management O&M Annual Subtotal					$0.00	
6.0.0	**LEACHATE COLLECTION SYSTEM O&M**						
	Generation Rate = _____ gal./ac./yr.						
6.1.0	Collection operation/maintenance (pump, piping, storage...operation/repair/replace)	1	Lump Sum		$7,500.00		Pump maintenance costs based on current Mill's cost to maintain these pumps
6.2.0	Leachate loading, off-loading and off-site transportation	N/A	Event				All leachate is managed and treated by the onsite lagoons which are operated and maintained as part of Mill operations.

LANDFILL POST CLOSURE COST ESTIMATE WOR SHEET						Permit: 0296-S3N	AFIN: 41-00002
ITEM No.	**ITEM**	**QUANTITY**	**UNITS**	**UNIT COST**	**COST**	**SUBTOTALS**	**SOURCE OF UNIT COST INFO**
6.3.0	Leachate Treatment/Disposal	N/A	Gal.				All leachate is managed and treated by the onsite lagoons which are operated and maintained as part of Mill operations.
6.4.0	Additional/upgrades for piping, pumps and storage	N/A	Lump Sum				Not anticipated
6.5.0	Leachate sample collection	N/A	EACH				Included in Item 7.4.0 and 7.5.0
6.6.0	Leachate sample analysis and reporting	N/A	EACH				Included in Item 7.4.0 and 7.5.0
	Leachate Collection System O&M Annual Subtotal					$7,500.00	
7.0.0	**GROUNDWATER MONITORING SYSTEM O&M**						
	Number of Wells in Approved System = 5						
7.1.0	Well maintenance (e.g., protective casing (lock & hinges) repair/replacement, well pad repair/replace, etc…)	2	EACH	$250.00	$500.00		Assume 2 per year, engineer's estimate
7.2.0	Upgrade/redevelop existing wells	N/A	EACH				Not anticipated
7.3.0	Well Replacement	0.5	Lin. FT.	$7,500.00	$3,750.00		Assume 1 well needs replaced in the 2-year post closure period
7.4.0	Sample collection (2 events per year)	N/A	Event				Included in Item 7.5.0
7.5.0	Sample analysis and reporting (2 events per year)	2	Event	$3,658.33	$7,316.67		Based on Current costs to perform these services by SCS Engineers.
	Groundwater Monitoring System O&M Annual Subtotal					$11,566.67	
8.0.0	**GAS MONITORING SYSTEM O&M**						
8.1.0	Number of Gas Monitoring Probes/Wells = _____						
8.2.0	Methane monitoring of probes/wells (4 per year)	N/A	Event		$		
8.3.0	Methane monitoring at site boundary and structures (4 per year)	N/A	Event		$		
8.4.0	Sample analysis and reporting	N/A	Event		$		
	Gas Monitoring System O&M Annual Subtotal					$0.00	
9.0.0	**GAS EXTRACTION SYSTEM O&M**						
	Gas vents, _____# of vents, _____ average depth						
9.1.0	**Passive System**						
9.1.1	Passive well head flare maintenance	N/A	EACH		$		
9.2.0	**Active System**						
9.2.1	Flare, ___ BTU/hour	N/A	EACH		$		
9.2.2	Additional Well Installation/Upgrades	N/A	EACH		$		
9.2.3	Ancillary gas equipment repair/replacement (piping, blowers, condensate collection)	N/A	Lump Sum		$		
	Gas Extraction System O&M Annual Subtotal					$0.00	
10.0.0	**CORRECTIVE ACTION EVALUATION AND IMPLEMENTATION**						
10.1.0	Resurvey monitoring well reference points and site benchmarks (prorate for annual expenses)	N/A	EACH		$		
10.2.0	Remove sediments from stormwater basin(s) (prorate for annual expenses)	N/A	EACH		$		
10.3.0	Groundwater exceedances statistical evaluation (	N/A	EACH		$		
10.4.0	Groundwater alternate source determination) (prorate for annual expenses)	N/A	EACH		$		
10.5.0	Groundwater compliance monitoring (prorate for annual expense)	N/A	EACH		$		
10.6.0	Other: _____ _____	N/A	EACH		$		
	Corrective Action Evaluation and Implementation Annual Subtotal					$	
	Total Post Closure Care Annual Cost Subtotal					$0.00	
11.0.0	**MISCELLANEOUS**						
					$		
					$		
	Misc. Subtotal					$	
	TOTAL ESTIMATED ANNUAL POST CLOSURE CARE COST					$54,942.48	
ESTIMATED 2 YEAR POST CLOSURE CARE PERIOD			2 x "Total Estimated Annual Post Closure Care Cost".			$109,884.95	