



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Secretary of Natural and Historic Resources

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Director

July 28, 2025

Ms. Kamryn Peffley
Environmental Manager
International Paper – Franklin Mill
34040 Union Camp Drive
Franklin, Virginia 23851

VIA ELECTRONIC MAIL

**RE: Long Term Stewardship Report
International Paper Mill, Franklin, Virginia
EPA ID No. VAD003112265**

Dear Ms. Peffley:

The Virginia Department of Environmental Quality, Office of Remediation Programs (DEQ) has prepared the attached report following the Long-Term Stewardship inspection performed on April 8, 2025 at the International Paper-Franklin Mill site located in Franklin, Virginia. The inspection found no outstanding items with compliance of engineering and institutional controls as defined within the 2018 Uniform Environmental Covenant Act (UECA)-compliant covenant.

You may contact me to discuss any questions. I can be reached at 804-584-3143 or by e-mail at stephanie.houston@deq.virginia.gov.

Respectfully,

A handwritten signature in blue ink, appearing to read "Stephanie Houston".

Stephanie Houston, Corrective Action Project Manager
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ECC: Tara Mason – DEQ-CO
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Brent Sasser – IP Corporate
Michelle Friedman – AECOM
Kristin Koroncai – USEPA Region III



**Long-Term Stewardship Assessment Report
International Paper Mill, Franklin, Virginia
EPA ID No. VAD003112265**

Prepared by: Stephanie Houston

Date: July 8, 2025

Remedy Review Summary

The Long-Term Stewardship Assessment showed that engineering and institutional controls selected and defined within the 2018 Uniform Environmental Covenant Act (UECA) covenant are implemented and remain intact and undamaged.

Introduction:

Long-term stewardship (LTS) refers to the activities necessary to ensure that engineering controls (ECs) are maintained and that institutional controls (ICs) continue to be observed. The purpose of the EPA Region 3 LTS program is to periodically assess the efficacy of the implemented remedies (i.e., ECs and ICs) and to update the community on the status of the Hazardous Waste Cleanup facilities. In October 2024, EPA changed the name of its “Resource Conservation and Recovery Act Corrective Action Program” to the “Hazardous Waste Cleanup Program.” This rebranding is intended to increase broad understanding of the purpose of the program. The LTS assessment is conducted in two-fold, which consists of a record review and a field inspection, to ensure that the remedies are implemented and maintained in accordance to the final decision.

The Hazardous Waste Cleanup Program has identified key elements of effective Long-Term Stewardship for hazardous waste cleanups. The LTS Report took into consideration the following elements while preparing this report:

Element 1 – Legal Authorities

Element 2 – Information Regarding Engineering and Institutional Controls

Element 3 – Long-Term Facility Oversight, Monitoring, and Maintenance

Element 4 – Recordkeeping and Tracking

Element 5 – Meaningful Engagement and Consultation

Element 6 – Funding

Element 7 – Enforcement

Element 8 – Enforceable Mechanisms

Element 9 – Dedicated Resources

Site Background:

International Paper (“Facility”), formerly Union Camp Corporation, operates an integrated Kraft pulp and paper mill in Franklin, Virginia. The site is located on the Blackwater River in Isle of Wight County, eight miles from the North Carolina border. The Facility is located to the east of

the Blackwater River. The areas to the north, south and west of the Facility are generally wooded, agricultural or residential. The Facility is located on approximately 3,660 acres.

The paper mill has been in operation since 1937. Types of paper manufactured at the Facility had included offset paper, postcard paper, one-sided coated paper that is later converted into book covers, envelope paper, brown Kraft envelope paper, Kraft bag paper, office paper and forms paper. The operation is fully integrated, from the manufacture of bleached pulp (using elemental chlorine-free processes) to the production of paper and the conversion of that paper into customer-sized rolls and sheets. The wood resource is converted into bleached pulp in the Pulp Mill/Bleach Plant with the by-products of the process converted into saleable chemicals. The Facility also utilizes recycled content from an on-site recycling plant. Other operations included two specialty chemical plants, the Lumber Mill, and the Effluent Treatment System C and D Ponds. The specialty plants (Air Products and Specialty Minerals) and the Lumber Mill were located north of the main process area of the paper mill. The C and D "hold-and-release ponds" are located 3.5 miles to the south of the Franklin Mill and are connected to the Mill by pipeline.

The facility implemented a Groundwater Quality Assessment Program in June 1983, which confirmed elevated levels of hazardous groundwater constituents at the facility. In April 1995, the Virginia Department of Environmental Quality (DEQ) issued a Post-closure Care Permit pursuant to the Resource Conservation and Recovery Act (RCRA) for the regulated unit at the International Paper, Franklin, Virginia facility. In 1997, the permit was modified to include the Regulated Unit Corrective Action (RUCA) for the facility. The Corrective Action Permit identified solid waste management units (SWMUs) and areas of concern (AOCs) at the facility. On March 14, 2003, the facility entered into a Facility Lead Corrective Action Agreement with the US Environmental Protection Agency (EPA) Region 3 to administer the Hazardous and Solid Waste Amendments (HSWA) Corrective Action Program. The DEQ continues to manage the RUCA for the Lime Mud Pond #4.

A Statement of Basis (SB) was publicly noticed on April 14, 2008 in the Tidewater News, Franklin, VA newspaper. The 45-day comment period ended on May 29, 2008, with no comments. The Final Decision and Response to Comments (FDRTC) was issued on June 9, 2008. A LTS evaluation was completed on April 17, 2015 and indicated that the final remedy was being implemented adequately. The Site also operated under the Hazardous Waste Management and Facility-Wide Corrective Action Permit (Permit) until its expiration on October 22, 2018. A termination of the Declaration of Restrictive Covenants, which was recorded on June 7, 2010, was filed July 30, 2018 because a UECA was forthcoming. A Uniform Environmental Covenant Act (UECA) covenant was recorded on August 13, 2018, which served as the mechanism for continuing remedy implementation. The Permit was allowed to expire with the execution of the UECA covenant.

Current Site Status:

The Facility is still an active paper mill. It currently produces fluff pulp rather than paper products; however, the processes and materials used are still the same. The two specialty plants, Air Products and Specialty Minerals, have also been shut down. The Facility stated that the land

designated as the Franklin Sawmill Area on the EPA geospatial map of the northern parcels is owned by International Paper but is leased to Franklin Lumber.

Element 1: Legal Authorities

The Final Remedy Decision was issued under the authority of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Sections 6901 and 6992k.

Institutional controls defined within the remedy for the facility were implemented through a UECA-compliant covenant recorded with the Clerk of Circuit Court of the City of Suffolk on August 13, 2018. The Covenant serves as the authority for enforcing the final remedy at the Facility.

Element 2: Information Regarding Engineering and Institutional Controls

The following controls were described in the Covenant recorded on August 13, 2018 and as part of the CA remedy.

Associated Area	Restriction
Franklin Paper Mill Area	1. Area shall not be used for residential purposes, which shall include daycare facilities, schools, or playgrounds for children under the age of 16. 2. The use of groundwater from the upper aquifer beneath the area for purposes other than environmental testing is prohibited, unless it is demonstrated to the Agency that such use would not pose an unacceptable risk to human health and the environment or interfere with or adversely impact the selected remedy as described in the Statement of Basis.
Highground Disposal Area	
Franklin Sawmill Area	
Highground Disposal Area	The Highground Disposal Area Cap shall not be disturbed except as necessary to perform work to maintain the integrity of the Highground Disposal Area Cap
Waste Water Ponds	The area shall not be used for residential purposes, which shall include daycare facilities, school, or playgrounds for children under the age of 16.

Element 3 – Long-Term Facility Oversight, Monitoring and Maintenance

The UECA covenant requires that institutional controls are maintained at their associated areas. The UECA Covenant requires that, whenever requested in writing by the Agency, the then current owner of the Property shall submit to the Agency, DEQ, and any Holder, written documentation stating whether or not the activity and use limitations in the covenant are being observed. In addition, within one (1) month after any of the events listed in Section 5(b) of the Environmental Covenant, the then current owner of the Property shall submit to the Agency, DEQ, and any Holder written documentation describing the event.

A large portion of the Facility is located within a floodway or flood hazard area as indicated on [FEMA's National Flood Hazard Layer \(NFHL\) Viewer](#). Most of the northern parcels are impacted by flood areas. Most of the Franklin Sawmill Area is either within a regulatory floodway, a 1% annual chance flood hazard zone, or 0.2% annual chance flood hazard zone. Most of the Highground Disposal Area is either in a 1% annual chance flood hazard zone or 0.2% annual chance flood hazard zone. For the remainder of the northern parcels of the Facility, the northern portion is primarily in a 1% annual chance flood hazard zone, and the southern portion is primarily in a 0.2% annual chance flood hazard zone. Virtually all of the southern parcels are not within a floodway or flood hazard area.

Element 4 – Recordkeeping and Tracking

The UECA covenant and Final Remedy provide visual representation of the activity and use limitations.

Mapping: The EPA Facility website figure has been updated with a Geospatial PDF showing the use restriction boundaries. The map was field-verified, and no issues were noted.

Element 5 – Meaningful Engagement and Consultation

The Facility has active operations, and it has no off-site impacts. The commencement of a forty-five (45)-day public comment period for the SB was announced in the Tidewater News on April 14, 2008. EPA received no comments on its proposed remedy for the Facility; the Final Remedy therefore did not change from the remedy proposed in the SB.

Element 6 – Funding

With termination of the 2008 permit in 2018, and as replaced with the UECA Covenant, the Facility is no longer under any hazardous waste financial assurance obligation.

Element 7 – Enforcement

EPA, without limitation, reserves its right to take administrative enforcement action under RCRA or other federal law for violations. The Notice of Use Limitation provides additional enforceability for the Grantor and the Agency.

Element 8 – Enforceable Mechanisms

Corrective Action remedies are enforceable through a UECA covenant recorded on August 13, 2018. A call to the Deed Desk (751-514-7812) of the Clerk of the Circuit Court on June 9, 2025 indicated that no other documents have superseded the Notice.

Element 9 – Dedicated Resources

The Performance Partnership Grant Workplan provides for Long-Term Stewardship activities.

Long-term Stewardship Site Visit: On April 8, 2025

DEQ conducted a long-term stewardship site visit to discuss and assess the status of the implemented remedies at the site. The attendees were:

- Brent Sasser, International Paper-Corporate
- Kamryn Peffley, International Paper-Franklin Mill
- Eric Parker, International Paper-Franklin Mill
- Michelle Friedman, AECOM
- Stephanie Houston, DEQ

A field report is included below with this report. The following summary and additional notes are derived from the field report:

- All engineering and institutional controls are being followed.
- A comment in the 2015 LTS stated the Facility had said that Pond D had been sold to the Department of Conservation and Recreation in late 2012. During the LTS site visit, it was verified that this sale did not occur, and the facility boundaries as defined by the EPA geospatial maps as of this LTS are accurate.
- New potable wells had been installed next to the current potable wells. The current potable wells are 500+ ft deep and therefore not within the upper aquifer, for which there are restrictions in the UECA covenant. Facility representatives stated the new wells are approximately 120+ ft deep. A groundwater conceptual site model developed in September 2005 indicates that the uppermost aquifer ends 10 to 20 feet below land surface; the new “shallow” wells are therefore not within the upper aquifer.

Follow-up Activities:

No follow-up activities are required for this LTS evaluation.

DEQ Long-Term Stewardship Facility Map
International Paper-Franklin Mill – Franklin, Virginia



International Paper Mill, Franklin
2025 Long Term Stewardship Inspection

Select Site Photos
Photos by: Stephanie Houston
April 8, 2025

GW-11R



At GW-11R facing south.

GW-39 and GW-22R



At GW-39 facing east.

International Paper Mill, Franklin
2025 Long Term Stewardship Inspection



At GW-22 facing west. GW-22 has a similar monitoring sign as GW-39, which is attached to the building.

L1-2 and Highground Disposal Facility



At L1-2 facing south.

International Paper Mill, Franklin
2025 Long Term Stewardship Inspection



At Highground Disposal Facility facing northwest.

GW-04R



At GW-04R facing east.

LMP-2



At LMP-2 facing east.

International Paper Mill, Franklin
2025 Long Term Stewardship Inspection

Field Checklist
International Paper-Franklin Mill – Franklin, Virginia

Site visit date: 4/8/2025

Time of visit: 1:00 PM

People Present (name/affiliation):

- Brent Sasser, International Paper-Corporate
- Kamryn Peffley, International Paper-Franklin Mill
- Eric Parker, International Paper-Franklin Mill
- Michelle Friedman, AECOM
- Stephanie Houston, DEQ

<u>IC Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have the ICs specified in the remedy been fully implemented? Implementation mechanism in place?	X		
• Do the ICs provide control for the entire extent of contamination (entire site or a specific portion)?	X		
• Are the ICs eliminating or reducing exposure of all potential receptors to known contamination?	X		
• Are the ICs effective and reliable for the activities (current and future) at the property to which the controls are applied?	X		
• Have the risk of potential pathway exposures addressed under Corrective Action changed based on updated screening levels and new technologies?	X		
• Are modifications to the IC implementation mechanism needed? (i.e. UECA Covenant, Permit or Order)		X	
• Are there plans to develop or sell the property?		X	<ul style="list-style-type: none"> • Pond D was not sold to DCR • State owns a lot of land around C pond but accounted for in EPA map • Franklin Sawmill Area – Franklin owns land, lessee pays for equipment
• Have all reporting requirements been met?	X		

International Paper Mill, Franklin
2025 Long Term Stewardship Inspection

<u>Groundwater Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is groundwater onsite used for potable purposes?	X		Deep water (875 ft) in south used for potable purposes
• Is the Facility connected to a public water supply?	X	X	<ul style="list-style-type: none"> Potable water from Potomac Aquifer; some trailers use Franklin Water #4, 5, 6, 7 deep wells now also have shallow wells – capital project to add 5 shallow wells to south well field @ 120 ft
• Have any new wells been installed at the facility?	X		Potable wells, no monitoring wells. Talked with DEQ and VDH about installing them.
• Are the current groundwater flow rate and direction similar as mentioned in the previous studies.			N/A
• Groundwater contaminants stable or decreasing in concentration?	X		
• Are groundwater monitoring wells still in place (# wells)?	X		
• Any evidence or reason to re-evaluate the number and location of monitoring points and/or monitoring frequency?	X		<ul style="list-style-type: none"> Possibly replace GW-04R – 1 inch well, prefer 2 inch GW-22R plans for decommissioning
• For wells where groundwater monitoring is no longer required, have the wells been decommissioned?	X		No recent abandonments, considering GW-22R for decommissioning
• Is there evidence of monitored natural attenuation occurring in groundwater?	X		See annual report

<u>Surface and Subsurface Soil Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Is the facility being used for residential purposes?		X	
• Have there been recent construction or earth-moving activities or plans for such?		X	

International Paper Mill, Franklin
2025 Long Term Stewardship Inspection

<u>Engineered Cap or Cover Review and Assessment Questions:</u>	<u>Yes</u>	<u>No</u>	<u>Notes</u>
• Have vegetative landfill caps (name) been properly maintained?	X		
• Have any repairs been necessary? (i.e. regrading, filling, root removal)	X		See annual report

Other Notes