May 07, 2015

Mark Mammenga, Environmental Engineer
Georgia-Pacific Toledo, LLC
Toledo Pulp and Paper Operations
1400 SE Butler Bridge Rd
Toledo, OR 97391

Re: Beneficial Use Determination Approval
BUD -20150203
GP Toledo Lime Soil/AgriLime
Lincoln County

Dear Mr. Mammenga:

The Department of Environmental Quality (DEQ) has completed its review of your application for a solid waste beneficial use determination. GP-Toledo Mill proposes to use lime residual (lime soils) by-product from the recausticising process that consists of inert and reactive calcium compounds (primarily CaO and CaCO₃). The majority of these lime soils comes from a new dregs filter which is currently being installed with the left over consisting of grit and other lime residuals (ArgiLime).

DEQ has determined that the proposal for beneficial use of the lime residual meets the requirements for a Tier 2 case-specific Beneficial Use Determination (BUD) under OAR 340-093-0260 through 0290. The BUD is based on a review of whether the proposed solid material meets the case-specific beneficial use performance criteria outlined in OAR340-093-0280. Details of the review for the waste material beneficial use are provided in the attached BUD evaluation form.

The BUD approval is limited to the lime residual generated from the GP-Toledo Mill in Toledo, Oregon, only and the use described herein. The conditions (specified in the table below) of this BUD approval are intended to prevent adverse impacts to public health, safety, welfare, or the environment from the use of the material.

<table>
<thead>
<tr>
<th>Solid waste material</th>
<th>Case-specific beneficial use</th>
<th>Conditions of use</th>
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<tbody>
<tr>
<td>Lime Soil / AgriLime</td>
<td>applying the ArgiLime to the fields as a replacement for traditional agriculture lime</td>
<td>1. The material is only authorized for the lime residual (lime soil/AgriLime) generated from the recausticising process at the GP-Toledo Mill in Toledo, Oregon.</td>
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<td>2. The material must not contain concentrations of hazardous substances above Oregon Department of Agricultural limits for non-nutritive metals.</td>
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<td>3. The material may be used only for agriculture soil amendment.</td>
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<td>4. The material should be stored at an area with drainage ditches around the site to divert water away from the lime storage area.</td>
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</table>
If no material is used for beneficial use under the conditions of this BUD approval within eighteen (18) months from the date of approval, DEQ may:

- re-evaluate this approval and may withdraw this approval, and
- require that you manage the material in a different manner or dispose of the material at a permitted solid waste disposal site.

If you have any questions regarding this BUD, please call Hugh Gao at 503-378-4977 or Bill Mason at 541-687-7427.

Sincerely,

[Signature]

Brian Fuller, Manager
Western Region Hazardous and Solid Waste Permitting and Compliance

Enc: Beneficial Use of Solid Waste Determination Evaluation Form

cc: Bill Mason, DEQ-Eugene
    Hugh Gao, DEQ-Salem