

**REQUEST FOR QUALIFICATIONS
PROGRESSIVE DESIGN BUILD SERVICES
WASTEWATER TREATMENT PLANT
TOWN OF CANTON
HAYWOOD COUNTY, NORTH CAROLINA**

RFQ ISSUED April 28, 2026
RESPONSES DUE June 7, 2026



Town of Canton
P.O. Box 987
Canton, North Carolina 28716

Lisa Stinnet, Town Manager
lstinnett@cantonnc.com

This **REQUEST FOR QUALIFICATIONS** ("RFQ") from the Owner named below invites the submittal of a Statement of Qualifications ("SOQ") from firms interested in providing design-build services for the Project described below. By submitting an SOQ, the Offeror represents that it has carefully read the terms and conditions of this RFQ and all attachments and Addenda and agrees to be bound by them. This RFQ is not an offer to enter into a contract, but merely a solicitation of persons interested in submitting SOQ to the Owner for the Project.

SECTION 1 – GENERAL PROJECT INFORMATION

OWNER

Town of Canton
85 Summer Street
Canton, NC 28716

PROJECT

Canton Wastewater Treatment Plant (WWTP) Design Build

Site Specific Address: 7291 Old Clyde Rd. Canton, NC 28716

General Location Map:

Wastewater Treatment Plant
Town of Canton

Approximate Footprint
April 2026



OWNER CONTACT PERSON

Lisa Stinnett, Town Manager
85 Summer Street
Canton, NC 28716
lstinnett@cantonnc.com

GENERAL PROJECT DESCRIPTION

The proposed Town of Canton Wastewater Treatment Plant (WWTP) will have a treatment capacity of approximately 4 million gallons per day (MGD). The design and construction shall ensure that expandability of the facility is possible. This project will entail design, permitting, and construction of the new facility, along with a new pump station and force main to convey wastewater to the new facility. A new effluent discharge to the Pigeon River will be required. The selected Offeror (Design-Builder) will form a team with the Town and its Owner's Advisor (OA) and execute preliminary and final comprehensive agreements for design and construction at a total project cost within the approved budget amount.

The Design-Builder may also:

- Provide survey and subsurface utility engineering services.
- Assist with easement acquisition for the new pump station and force main.
- Provide geotechnical investigations in addition to information that will be made available to the selected team, previously collected by others.

The Design-Builder and the Design-Builder's subconsultants and subcontractors will be an integral member of the Project Team. The Project Team will consist of the Design-Builder Team, representatives from the Town, the Town's Owners Advisor, and other stakeholders (such as State Regulatory Officials and Funding Agencies) that may be identified during the project delivery. It will be the responsibility of the Design-Builder to integrate the design and construction phases, utilizing skills and knowledge of design and general contracting, to provide design, value engineering and constructability reviews, develop schedules, prepare detailed project construction estimates, study labor conditions, and, in any other way deemed necessary, to contribute to the development of the Project during the pre-construction/design phase. The proposal shall not focus on the existing plant but rather on new construction. The existing WWTP that was originally part of the Pactiv/Evergreen paper mill will remain in service until the new plant is brought online.

The project's anticipated schedule is to be substantially complete and in operation in Spring of 2029.

PROJECT OBJECTIVES

- Establish a collaborative relationship between the Owner, Owner's Advisor, and the Design-Build Team to deliver quality design and construction on an expedited schedule, within the Owner's budget, and within the available footprint.
- Maintain a safe, injury-free work site.
- Minimize impacts to Owner customers through close coordination with the Owner and its customers.

ESTIMATED BUDGET

The total budget associated with the Scope of Work described herein is currently estimated to fall within the range of \$60,000,000 to \$70,000,000. This planning-level range reflects the best available information at this stage and will continue to be refined as design development, permitting, and procurement activities progress.

PROCUREMENT SCHEDULE

The following is the Project Procurement Schedule. The Owner reserves the right to modify the Project Procurement Schedule via Addenda issued prior to the date set forth below.

Date/Time	Activity
April 28, 2026	Advertise/Issue RFQ
May 11, 2026, at 10:00 AM	Pre-Submittal Briefing
May 30, 2026	Last Date to Submit Questions Regarding the RFQ
June 7, 2026, at 2:00 PM	SOQ Due Date
On or Before July 2, 2026	Notification of Short Listed Offerors, if Required
On or Before July 16, 2026	Short List Interviews/Presentations, if Required
On or Before July 21, 2026	Notification of Preferred Offeror

DEFINITIONS

Business Day: Any day on which the Owner is open for regularly conducted business.

Design-Builder: The entity with the prime design-build contract with the Owner.

Design-Build Team: All entities listed by the Design-Builder as providing services or construction on the Project. The Design-Builder is not required to list all members of the Design-Build Team in the SOQ. Members of the Design-Build Team may also be referred to as "Team Members".

Design Excellence: Design Excellence is achieved with memorable design solutions that exceed the Owner's vision, emphasize schedule and budget, result in long term operability, and possess a holistic awareness that considers context, site, and the environment.

Key Team Member: Individuals who will be assigned to the Project who play an important role in the design, construction, or management of the Project.

Procurement: The Owner's process for selecting a Design-Build Team for this Project.

Procurement Documents: All documents issued by the Owner in connection with the Procurement or Project.

Projects of Similar Scope and Complexity: Projects that had completion dates within the last 10 years and that have many or all of the following characteristics:

- a. Projects of a similar size and budget that include design and construction of WWTPs.
- b. Projects that utilize an integrated delivery method that require strong coordination and integration of the design and construction professionals and early involvement of the construction professionals during design.
- c. Projects where the Design-Builder was selected prior to the establishment of the final price and schedule and where the Design-Builder collaborated with the Owner to develop the final price and schedule.

SECTION 2: PROCUREMENT PROCESS

SOQ SUBMISSION AND DUE DATE/TIME

Offeror's SOQ shall be submitted in PDF form, at a file size no greater than 20 MB, by email to lstinnett@cantonnc.com. Submissions are due no later than **June 7, 2026, at 2:00 PM**.

All SOQs must be submitted pursuant to the instructions included herein. It is the Offeror's sole responsibility to ensure that the SOQ is delivered in the manner required by this RFQ by the Due Date and Time. Owner has the right to reject any SOQs not properly delivered. Late proposals, regardless of cause, will not be considered, and will automatically be disqualified from further consideration.

The Proposer is solely responsible for ensuring that all electronic submittals, including email-based submissions, are successfully transmitted and received by the Owner. Because electronic communications may be delayed, blocked, or intercepted by spam filters or other security systems, the Proposer must verify receipt prior to the submission deadline. The Owner assumes no responsibility for incomplete, delayed, corrupted, or undelivered electronic submissions.

PRE-SUBMITTAL BRIEFING

The Town will host a non-mandatory briefing on **May 11, 2026, at 10:00 AM**. A site visit will be held immediately after. The Town strongly encourages Offerors to participate in the briefing. The location of the briefing will be in Canton Town Hall, located at 85 Summer Street, Canton, NC.

QUESTIONS

The Owner will not respond to telephone questions regarding this RFQ. All questions are to be directed to the Town Manager via email by **May 30, 2026, at 4:00 PM**, with the subject line: "Canton WWTP Design-Build". Interpretations or clarifications considered necessary in response to submitted questions will be issued via addenda. Addenda will be posted on the Town's website.

Following the pre-submittal briefing, the Town will post a Q&A Summary via addendum. Offerors must acknowledge receipt of all issued addenda on the cover letter of the submission.

COMPLIANCE WITH LEGAL REQUIREMENTS

The Proposer is solely responsible for ensuring that all submittals, including qualifications, proposals, pricing, certifications, and supporting documentation, fully comply with all applicable state and federal procurement requirements. This includes, but is not limited to, the provisions of 2 CFR 200 requirements, and any additional federal conditions. The Proposer must independently verify that its submittal meets all mandatory state and federal rules, documentation standards, and certification obligations. The Owner will not be held responsible for a Proposer's failure to comply with state and federal procurement regulations.

CONFLICT OF INTEREST AND COMMUNICATIONS WITH OWNER

Offerors are required to conduct the preparation of their SOQs with professional integrity and free of lobbying activities. Communication with the Owner regarding this Project shall be via email or regular mail only and directed to the following Owner's Representative: Lisa Stinnett, Town Manager. Do not communicate about the Project or the Procurement with any other Owner employees, representatives, or consultants. Proposers are strictly prohibited from contacting the Owner's Advisor regarding this procurement outside of the formal communication channels identified in this solicitation. All inquiries, requests for information, and clarifications must be submitted only to the Owner's designated point of contact. Unauthorized contact with the Owner's Advisor may result in disqualification from further consideration. Communication with other Owner employees, representatives, or consultants regarding the Procurement may cause the firm involved to be disqualified from submitting under this Procurement. Any verified allegation that a responding Offeror or Team Member or an agent or consultant of the foregoing has made such contact or attempted to influence the evaluation, ranking, and/or selection of short-listed Offerors may be the

cause for Owner to disqualify the Offeror team from submitting an SOQ or Proposal, to disqualify the Team Member from participating in the Procurement, and/or to discontinue any further consideration of such Offeror or Team Member.

EXPENSES OF THE OFFEROR

The Owner accepts no liability for the costs and expenses incurred by firms in responding to this Procurement. Each Offeror that enters into the Procurement process shall prepare the required materials, the SOQ, and the Proposal at its own expense and with the express understanding that the Offeror cannot make any claims whatsoever for reimbursement from the Owner for the costs and expenses associated with the process, even in the event the Owner cancels this Project or rejects all Proposals.

PUBLIC DISCLOSURE

All documentation and submittals provided to the Owner may be considered public documents under applicable laws and may be subject to disclosure. Offerors recognize and agree that the Owner will not be responsible or liable in any way for any losses that the Offeror may suffer from the lawful disclosure of information or materials to third parties.

Any materials requested to be treated as confidential documents, proprietary information, or trade secrets must be clearly identified and readily separable from the balance of the SOQ or Proposal. Such designations will not necessarily be conclusive, and Offerors may be required to justify why such material should not, upon written request, be disclosed by the Owner under the applicable public records act. All costs incurred by Offerors associated with any public records request are the responsibility of the Offerors.

OWNER RIGHTS AND PROCUREMENT CONDITIONS

The Owner reserves without limitation, and may exercise at its sole discretion, the following rights and conditions with regard to this Procurement process:

- a. To cancel the Procurement process and reject any and all SOQs and/or Proposals;
- b. To waive any informality or irregularity;
- c. To revise the Procurement Documents and Schedule via an Addendum;
- d. To reject any Offeror that submits an incomplete or inadequate response or is not responsive to the requirements of this RFQ;
- e. To contact references who are not listed in the Offeror's SOQs and investigate statements on the SOQs and/or qualification of the Offeror, and any firms or individuals identified in the SOQ;
- f. To consider Alternative Technical Concepts and/or approaches identified by Offerors;
- g. To take any action affecting the RFQ process, the RFP process, or the Project that is determined to be in the Owner's best interests; and
- h. Approve or disapprove of the use of particular Subconsultants, Subcontractors, or Key Team Members and/or substitutions and/or changes to Subconsultants, Subcontractors, or Key Team Members from those identified in the SOQ or Proposal. Such approval or disapproval shall not be unreasonably exercised.

OUTLINE OF THE PROCUREMENT PROCESS

Request for Qualifications (RFQ)

- a. This RFQ invites firms to submit SOQs describing in detail their technical, management, and financial qualifications to design, permit, construct, commission, and close out the Project. The issuance of this RFQ is the first phase of the Procurement process.

- b. Offerors will submit their SOQ and other deliverables required pursuant to this Procurement at the time and in the manner set forth in this RFQ and any Addenda. The Owner will not consider SOQ or other deliverables that are submitted after the Time set forth in the RFQ. Offerors are solely responsible for making sure that the Owner receives the SOQ in a timely fashion.
- c. The Owner will evaluate the information submitted by each Offeror to 1) determine whether the Offeror meets the mandatory minimum requirements and 2) evaluate the SOQ provided by each Offeror pursuant to the evaluation system described below. Any Offeror who fails to meet the mandatory minimum requirements set forth in this SOQ will be deemed non-responsive and will not be considered further by the Owner in this Procurement.
- d. All SOQ will be evaluated in accordance solely with the criteria established in the RFQ and any Addenda issued thereto. The evaluation criteria are listed below, including the relative weight or importance given to each criterion.
- e. Multiple responsive and responsible firms may be selected for short list interviews at the discretion of the owner. The number of shortlisted firms would be determined based on the SOQ submissions received.
- f. If short list interviews are conducted, the results of the SOQ evaluations will be carried forward and included in the final evaluation and selection.
- g. Design-Build Team Members and individual Key Team Members will be used as a basis for selection. Once shortlisted, neither the Offeror nor Team Members that are submitted to the Owner as part of the SOQ or Proposal may substitute a listed consultant, subconsultant or subcontractor, or any individual listed as a Key Team Member; however, a change to any submitted Team Member or Key Team Member will result in re-evaluation and may result in a change to the evaluation and ranking of the Offeror.

Evaluation and Ranking of Offerors

For the purpose of selecting and evaluating Offerors submitted SOQs, a review committee, which will not include the Owners Advisor, will score submissions. The evaluation criteria will be given the following relative weights. The weighted scoring below shall consider both company and individual team member experience:

Past Design and Permitting Performance	20%
Past Construction Performance	25%
Team Experience with Collaborative Delivery	20%
Project Delivery Approach	30%
Price for Initial Alternatives Analysis	5%

CONTRACT FORMAT

The Owner will enter into negotiations for the Design-Build Agreement with the Preferred Offeror. The Design-Build Agreement is anticipated to utilize the Design-Build Institute of America Standard Form of Agreement Between the Owner and Design-Builder Form Number 544, and the DBIA Standard Form of General Conditions of Contract Between Owner and Design-Builder, Form Number 535, as amended and set forth in the RFP.

SECTION 3: SOQ DOCUMENTATION REQUIREMENTS

SOQ FORMAT REQUIREMENTS

The SOQs shall comply with the following format requirements:

- SOQs shall be formatted in searchable PDF format.
 - The body of the SOQ shall be organized in accordance with the Evaluation Criteria.
 - The body of the SOQ, when printed, shall be limited to a maximum of (25) single-sided pages.
- a. The **only** documentation that is **not** included in the page count is the following:
 - i. Letter of interest or cover letter, which is limited to one (1) single-sided page;
 - ii. Statement of Offeror's Ability to Meet the Owner's Insurance Requirements;
 - iii. Corporate Structure Questionnaires;
 - iv. Resumes of Key Team Members, which are limited to one (1) single-sided page;
 - v. Divider tabs, provided that they contain no substantive content; and
 - vi. Cover pages, provided that they contain no substantive content.
 - b. **SOQs that exceed the page limit shall be considered non-responsive.**
 - c. A "page" shall be defined as one single-sided piece of paper that has words, charts, tables, pictures, or graphics. Pages shall be 8.5 x 11 inches, with the exception of two (2) pages, which may be presented in 11 x 17-inch format; however, larger pages may only contain graphics and/or designs and may not be used for an Offeror's narrative.
 - d. The font shall be no smaller than 11 point.

SOQ ORGANIZATION

SOQs shall consist of the following parts:

1. Letter of Interest, limited to one (1) single-side page
2. Minimum Qualifications
 - a. Statement of Offeror's Ability to Meet the Owner's Insurance Requirements. (See Attachment)
3. Technical & Management Qualifications

For each Project identified in the SOQ, provide the following information. The information required in this section should be provided in a dedicated section of the SOQ. The identification of Projects will not be evaluated separately. Rather, the Projects will be evaluated in the context of the criteria set forth herein.

- Name of Project;
- Owner/Customer;
- Location of Project (include address);
- Description of the delivery method and integration of design and construction, identifying the firm(s) role as a prime consultant, subconsultant, contractor, subcontractor, or other;
- Project description and applicability and relevance of the referenced Project to the evaluation criteria for this Project;
- Name of each Key Team Member who is proposed for this Project who played a significant role on the Project example, including a description of their Project responsibilities and functions;
- The overall project value;
- The number and value of change orders over the life of the project;
- The date of project completion;
- Project contact of the owner or customer (current address, e-mail, and phone number) who can verify the characteristics of the submitted Project example.

- a. Team Organization
 - b. Engineering, Permitting, and Design Past Performance
 - c. Construction Past Performance
 - d. Design-Build Past Performance
 - e. Demonstrated History of Successful Projects Similar in Scope and Complexity
4. Corporate Structure Questionnaire(s).

SECTION 4: SOQ EVALUATION CRITERIA AND SUBMITTAL INFORMATION

COVER LETTER

The SOQ must include a cover letter containing the name, address, telephone number, fax number, and e-mail address of the Offeror and the principal contact person. The Cover Letter shall also include the type of firm or organization (corporation, partnership, joint venture, etc.) that will serve as the prime contracting party.

MINIMUM QUALIFICATIONS

Statement of Offeror's Ability to Provide Performance and Payment Bond (Pass/Fail)

As a **mandatory minimum requirement**, the Offeror must have the ability to obtain a performance and payment bond in the amount of \$80,000,000. Offeror shall provide a letter signed by an authorized representative of Offeror's surety company (or agent) confirming that the Offeror can meet this minimum requirement. Any Offeror who fails to meet this mandatory minimum requirement will be considered non-responsive and will not be considered further by the Owner in this Procurement process. The surety shall be a company authorized to conduct business in the state where the Project is located with a minimum rating of A-. Letters indicating "unlimited" bonding capability are not acceptable.

TECHNICAL AND MANAGEMENT QUALIFICATIONS

The SOQ shall demonstrate the Design-Build Team's ability to undertake the Project by providing the following technical and management qualifications of the Offeror, Team Members, and individual Key Team Members. The Offeror is responsible for ensuring that contact information contained in their referenced Project profiles is correct. The inability to contact a reference may have a detrimental impact on the evaluating qualifications.

Emphasis will be placed on past performance and expertise in performing substantive work on projects that are of Similar Scope and Complexity, as described in the definitions above. The Owner reserves the right to award more points to projects that have more of the characteristics set forth in the definition of Projects of Similar Scope and Complexity. The Owner also reserves the right to award more points to successful projects in which the Offeror, Team Members, and/or individual Key Team Members had substantial responsibility for their respective scopes of work.

The SOQ will be evaluated on the following technical and management qualifications:

Team Organization

- a. Provide an organization chart (showing Team Members, Key Team Members and their firm affiliation) for all phases of the Project from design through final acceptance and warranty and maintenance period. Be certain to identify specific individuals for key functions and show interrelationships and reporting hierarchy. Note whether individuals are performing multiple functions. At a minimum, identify the Key Team Members performing the functions identified below. To the extent that the Design-Builder has additional Key Team Members on their team, the Design-Builder should include those individuals.
 - i. Person responsible for the overall management of the Project and design-build contract;
 - ii. Designer of Record;
 - iii. Person responsible for overall construction management;
 - iv. Person responsible for on-site field supervision and direction and construction (Superintendent);
 - v. Person responsible for safety;
 - vi. Person responsible for quality assurance;
 - vii. Person responsible for cost controls and budgeting;
 - viii. Person responsible for scheduling; and
 - ix. Person responsible for systems testing, configuration, and commissioning.
- b. Provide a resume for all Key Team Members. Resumes should be no longer than 1 page and should include the following information:
 - i. Description of the individual's proposed Project role;
 - ii. Identification of current employer and number of years employed by the firm;
 - iii. Educational background, professional licenses, and/or certifications;
 - iv. Experience relevant to their proposed role on the Project and how their past performance on previous projects will benefit this Project; and
 - v. Based on the information available to the Design-Builder, proposed percentage of time that the Design-Builder intends to assign this individual to the Project.
- c. Describe the corporate structure of the Design-Builder and complete the corporate structure questionnaire for the Design-Builder and all Team Members in the form set forth in the form provided. If the prime Design-Builder is a Joint Venture, all Joint Venture partners must have functional responsibilities for the Project. Describe the duties of each Joint Venture partner.

Demonstrated Past Performance with Successful Projects of Similar Scope and Complexity

- a. Describe the Team's past performance in successfully managing design-build (or a similar integrated delivery model) Projects of Similar Scope and Complexity that include management and communications of an integrated team of design consultants, specialty subcontractors, and trade contractors. Include a description of any issues or problems that arose on the projects and how those issues or problems were resolved.
 - b. Describe the Team's past performance in developing integrated design and construction schedules for Projects of Similar Scope and Complexity.
 - c. Describe the Team's past performance in developing and/or managing costs within a Guaranteed Maximum Price delivery.
-

- d. Describe the Team's past performance working together and/or describe the steps the Team has taken to promote integration and a collaborative working environment. The Owner reserves the right to award more points to those teams who have worked together in a collaborative delivery model.
- e. Describe the Team's past performance with a minimum of two different treatment types. The list would preferably include Membrane Bioreactors, and Conventional Activated Sludge.

Design, Engineering, and Permitting Past Performance

- a. Describe the Design-Builder's past performance in managing the design process.
- b. Describe the Team's past performance with designing and permitting Projects of Similar Scope and Complexity. Include a description of any issues or problems that arose on the project and how those issues or problems were resolved.
- c. Describe the software used by the Team for design services, including a description of the drawing platform and other specialized software the Team would utilize for this Project.
- d. Outline what effluent limits would be met with the preferred treatment methodology and how a design would be flexible for any future changes to effluent limits imposed, such as PFAS.
- e. List all professional registrations and/or certifications that are relevant to the work associated with the Project.

Construction Past Performance

- a. Describe the Team's past performance with construction management and construction of Projects of Similar Scope and Complexity. Include a description of any issues or problems that arose on the projects and how those issues or problems were resolved.
- b. Include in the narrative the Team's approach to the following:
 - i. Assessing whether the Design-Builder has achieved performance requirements;
 - ii. Change orders; and
 - iii. Configuration, commissioning, and testing Projects of Similar Scope and Complexity.

Project Delivery Approach

- a. Describe the Team's approach to delivering the project (design and construction).
- b. Describe the Team's approach to accelerating the project delivery schedule and understanding of the existing site constraints.
- c. Describe the Team's approach to managing budget and GMP development.
- d. Describe the Team's approach with compliance with funding requirements on projects with multiple funding sources (state and federal).

Price Proposal for Initial Alternatives Analysis

Provide a price proposal for completion of an initial alternatives analysis that compares treatment technologies for the new WWTP. The analysis should assume a 4 MGD permitted discharge and adherence to 15A NCAC 02H.0100 – Wastewater Discharges to Surface Waters. For the purposes of the SOQ price proposal, it should be assumed that the analysis will include three alternatives. The alternatives analysis shall include:

- a. Concept-level siting of proposed treatment infrastructure within the available project area
- b. Preliminary construction cost estimates for each alternative
- c. Discussions of long-term operability and maintenance, as well as estimates for long-term operations and maintenance

- d. Permitting considerations
- e. A recommendation of a selected alternative based on the criteria listed above

SECTION 5: LIST OF ATTACHMENTS

Corporate Structure Questionnaire

NPDES Permit for the Existing Wastewater Treatment Facility

Corporate Structure Questionnaire

1. Offerors shall complete the following information for the Proposed Design-Builder and all proposed Design-Build Team Members:

Legal Name	
Street Address	
Mailing Address	
Point of Contact	
Position	
Email	
Telephone Number	
Fax Number	
Type of Business	
Federal Tax Identification Number	
State Contractor's Registration Number (if applicable)	
State Business License Number (if applicable)	

2. If the Proposed Design-Builder is a Joint Venture, Offerors must:
- Submit the above information the Joint Venture as well as for each member of the Joint Venture; and
 - Attach a copy of the Joint Venture Agreement to this form.

Blank Page

Permit Number: NC0000272

STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER RESOURCES

PERMIT

TO DISCHARGE WASTEWATER UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provision of North Carolina General Statute 143-215.1, other lawful standards and regulations promulgated and adopted by the North Carolina Environmental Management Commission, and the Federal Water Pollution Control Act, as amended,

**Blue Ridge Paper Products, Inc.
dba Evergreen Packaging**

is hereby authorized to discharge wastewater from a facility located at

Canton Mill Wastewater Treatment Plant
Off Highway 215
Canton
Haywood County

to receiving waters designated as the Pigeon River in the French Broad River Basin in accordance with effluent limitations, monitoring requirements, and other applicable conditions set forth in Parts I, II, and III hereof.

This permit modification shall become effective **December 1, 2024.**

This major modification and authorization to discharge shall expire at midnight on April 30, 2027.

Signed this day **October 19, 2024.**

DocuSigned by:

Douglas Dowden

57267E56E81A40D...

Douglas Dowden

Environmental Program Supervisor II

Industrial Permitting Unit

By Authority of the Environmental Management Commission

SUPPLEMENT TO PERMIT COVER SHEET

Permit Number: NC0000272

All previous NPDES Permits issued to this facility, whether for operation or discharge are hereby revoked. As of this permit issuance, any previously issued permit bearing this number is no longer effective. Therefore, the exclusive authority to operate and discharge from this facility arises under the permit conditions, requirements, terms, and provisions included herein.

**Blue Ridge Paper Products, Inc.
dba Evergreen Packaging**

is hereby authorized to:

1. Continue operation of a 4.9 MGD wastewater treatment plant for the treatment of wastewater associated with the Blue Ridge Paper Products Inc. pulp and paper mill, landfill leachate, the Town of Canton's municipal wastewater, stormwater runoff, and recovered treated groundwater, black liquor, and fuel oil associated with the EPA Administrative Settlement Agreement and Order on Consent for Removal Action [AOC] (CERCLA Docket No. CERCLA-04-2024-7000). The treatment system consists of the following treatment units:

- Grit Chamber
- Bar Screen
- Lift Pumps
- Polymer addition
- pH control (CO₂ injection or H₂SO₄ backup)
- Three primary clarifiers
- Nutrient Feed
- Aeration basins
- Three secondary clarifiers
- Residual belt presses
- Effluent flow measurement
- Cascade post aeration with oxygen injection
- Instream oxygen injection facilities

The facility is located at the Canton Mill WWTP, off Highway 215, Canton, Haywood County, and;

2. Discharge treated wastewater from said treatment works at the location specified on the attached map through outfall 001 into the Pigeon River, which is classified C water, in the French Broad River Basin.

Part I

A. (1.) EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

Grade IV Biological Water Pollution Control System

[15A NCAC 02B.0400 et seq., 02B.0500 et seq.]

During the period beginning on the effective date of the permit and lasting until expiration, the Permittee is authorized to discharge **treated industrial, municipal, groundwater, stormwater, and landfill wastewater** through outfall(s) **001**. Such discharges shall be limited and monitored⁶ by the Permittee as specified below:

<u>Effluent Characteristics</u>	<u>Limits</u>		<u>Monitoring Requirements</u>		
	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type	Sample Location¹
Flow	4.9 MGD		Continuous	Recording	I or E ₁
BOD, 5-day, 20°C	30.0 mg/L	45.0 mg/L	Daily	Composite	I, E ₁
Total Suspended Solids	30.0 mg/L	45.0 mg/L	Daily	Composite	I, E ₁
NH ₃ -N, mg/L			Daily	Composite	E ₁
Color ⁷ , PCU, mg/L			Daily	Composite	E ₁
Dissolved Oxygen ² , mg/L			Daily	Grab	E ₁
Temperature, °C			Daily	Grab	E ₁
pH ³			Daily	Grab	E ₁
Conductivity, µmho/cm			Daily	Grab	E ₁
Fecal Coliform	200/100 mL	400/100 mL	Weekly	Grab	E ₁
Total Nitrogen (NO ₂ -N + NO ₃ -N + TKN), mg/L			Monthly	Composite	E ₁
Total Phosphorus, mg/L			Monthly	Composite	E ₁
Chronic Toxicity ⁴			Quarterly	Composite	E ₁
Total Hardness, mg/L			Monthly	Composite	E ₁
40 Applicable PFAS compounds	See Footnote 10		Semi-annually	Grab	E ₁
Conductivity ⁵ , µmho/cm			Weekly	Grab	Pigeon River
Fecal Coliform ^{5,9}			Weekly	Grab	Pigeon River
Color ^{5,7} , mg/L			Weekly	Grab	Pigeon River
Dissolved Oxygen ⁵ , mg/L			Weekly	Grab	Pigeon River

Footnotes:

1. Sample Location: I- Influent, E₁ – Effluent, Pigeon River - Instream sampling as specified in A. (5.) Instream Monitoring Special Condition.
2. The daily average effluent dissolved oxygen concentration shall not be less than 6.0 mg/L.
3. The pH of the effluent shall not be less than 6.0 nor greater than 9.0 (on the standard units scale).
4. Chronic Toxicity (*Ceriodaphnia dubia*) at 12.7% Effluent Concentration: March, June, September, December (see A. (2.) Chronic Toxicity Permit Limit).
5. See A. (3.) Instream Monitoring Special Condition.
6. The permittee shall submit Discharge Monitoring Reports electronically using NC DWR's eDMR application system. Please See Special Condition A. (5.).
7. All samples collected for color analysis and for use in the above calculation shall be measured and reported using the procedure referenced in 39 FR 430.11 (b) (May 29, 1974) - true and apparent color or as amended by the EPA.
8. The temperature of the effluent will be regulated so that the temperature of the receiving stream **does not increase** more than 2.8°C (5.05°F) above the natural water temperature and **does not exceed** a maximum of 32°C (89.6°F).
9. The facility shall conduct separate Fecal Coliform monitoring for the Town of Canton Influent and the facility's influent to determine the cause of fecal coliform limit violations.

Permit Number: NC0000272

10. The facility shall employ method 1633 for analyzing PFAS compounds (version December 1, 2024). See Special Condition A. (9.).

There shall be no discharge of floating solids or visible foam in other than trace amounts.

The facility shall complete and submit EPA Form 2C for this Outfall no later than 6 months from the effective date of the permit and submit it to the Industrial NPDES permitting Unit.

Definitions:

MGD – Million gallons per day

lb/day – Pounds per day

mL – Milliliter

BOD – Biochemical Oxygen Demand

µg/L - Micrograms per liter

PCU – Platinum Cobalt Units

A. (2.) CHRONIC TOXICITY PERMIT LIMIT

[15A NCAC 02B.0200 et seq.]

The effluent discharge shall at no time exhibit observable inhibition of reproduction or significant mortality to *Ceriodaphnia dubia* at an effluent concentration of 12.7%.

The permit holder shall perform at a minimum, *quarterly* monitoring using test procedures outlined in the “North Carolina *Ceriodaphnia* Chronic Effluent Bioassay Procedure,” Revised December 2010, or subsequent versions or “North Carolina Phase II Chronic Whole Effluent Toxicity Test Procedure” (Revised- December 2010) or subsequent versions. The tests will be performed *during the months of* March, June, September, and December. Effluent sampling for this testing must be obtained during representative effluent discharge and shall be performed at the NPDES permitted final effluent discharge below all treatment processes.

If the quarterly test procedure results in a failure or ChV below the permit limit, then multiple-concentration testing shall be performed at a minimum, in each of the two following months as described in “North Carolina Phase II Chronic Whole Effluent Toxicity Test Procedure” (Revised-December 2010) or subsequent versions.

All toxicity testing results required as part of this permit condition will be entered on the Effluent Discharge Monitoring Form (MR-1) for the months in which tests were performed, using the parameter code **TGP3B** for the pass/fail results and **THP3B** for the Chronic Value. Additionally, DWR Form AT-3 (original) is to be sent to the following address:

Attention: North Carolina Division of Water Resources
Water Sciences Section/Aquatic Toxicology Branch
1621 Mail Service Center
Raleigh, North Carolina 27699-1621

Or, results can be sent to the email, ATForms.ATB@deq.nc.gov.

Completed Aquatic Toxicity Test Forms shall be filed with the Water Sciences Section no later than 30 days after the end of the reporting period for which the report is made.

Test data shall be complete, accurate, include all supporting chemical/physical measurements and all concentration/response data, and be certified by laboratory supervisor and ORC or approved designate signature. Total residual chlorine of the effluent toxicity sample must be measured and reported if chlorine is employed for disinfection of the waste stream.

Should there be no discharge of flow from the facility during a month in which toxicity monitoring is required, the permittee will complete the information located at the top of the aquatic toxicity (AT) test form indicating the facility name, permit number, pipe number, county, and the month/year of the report with the notation of “No Flow” in the comment area of the form. The report shall be submitted to the Water Sciences Section at the address cited above. Should the permittee fail to monitor during a month in which toxicity monitoring is required, monitoring will

Permit Number: NC0000272

be required during the following month. Assessment of toxicity compliance is based on the toxicity testing month. Should any test data from this monitoring requirement or tests performed by the North Carolina Division of Water Resources indicate potential impacts to the receiving stream, this permit may be re-opened and modified to include alternate monitoring requirements or limits.

NOTE: Failure to achieve test conditions as specified in the cited document, such as minimum control organism survival, minimum control organism reproduction, and appropriate environmental controls, shall constitute an **invalid test** and will require immediate follow-up testing to be completed no later than the last day of the month following the month of the initial monitoring.

A. (3.) INSTREAM MONITORING

[15A NCAC 02B.0500 ET SEQ.]

Stream Designation	Mile Marker	Location Description	Parameter	Frequency
UP	63.8	Pigeon River upstream of the waste treatment plant outfall (prior to mixing with the discharge)	D.O.	Weekly
			Fecal Coliform	Weekly
DN1	62.9	Pigeon River at Fiberville Bridge	Temperature	Weekly
			D.O.	Weekly
			Conductivity	Weekly
			Color	Weekly
			Fecal Coliform	Weekly

All instream samples shall be grab.

The permittee shall submit Discharge Monitoring Reports electronically using NC DWR's eDMR application system. Please See Special Condition A. (5.).

All samples collected for color analysis and for use in the above calculation shall be measured and reported using the procedure referenced in 39 FR 430.11 (b) (May 29, 1974) - true and apparent color or as amended by the EPA.

A. (4.) TOWN OF CANTON INFLOW AND INFILTRATION

[NCGS 143-215.1]

The permittee shall make continued efforts to promote reduction of inflow/infiltration to the Town of Canton's wastewater collection system.

A. (5.) ELECTRONIC REPORTING OF DISCHARGE MONITORING REPORTS

[G.S. 143-215.1(b)]

Federal regulations require electronic submittal of all discharge monitoring reports (DMRs) and program reports. The final NPDES Electronic Reporting Rule was adopted and became effective on December 21, 2015.

NOTE: This special condition supplements or supersedes the following sections within Part II of this permit (*Standard Conditions for NPDES Permits*):

- Section B. (11.) Signatory Requirements
- Section D. (2.) Reporting
- Section D. (6.) Records Retention
- Section E. (5.) Monitoring Reports

1. Reporting Requirements [Supersedes Section D. (2.) and Section E. (5.) (a)]

The permittee shall report discharge monitoring data electronically using the NC DWR's Electronic Discharge Monitoring Report (eDMR) internet application.

Monitoring results obtained during the previous month(s) shall be summarized for each month and submitted electronically using eDMR. The eDMR system allows permitted facilities to enter monitoring data and submit DMRs electronically using the internet. Until such time that the state's eDMR application is compliant with EPA's Cross-Media Electronic Reporting Regulation (CROMERR), permittees will be required to submit all discharge monitoring data to the state electronically using eDMR and will be required to complete the eDMR submission by printing, signing, and submitting one signed original and a copy of the computer printed eDMR to the following address:

NC DENR / Division of Water Resources / Water Quality Permitting Section
ATTENTION: Central Files
1617 Mail Service Center
Raleigh, North Carolina 27699-1617

If a permittee is unable to use the eDMR system due to a demonstrated hardship or due to the facility being physically located in an area where less than 10 percent of the households have broadband access, then a temporary waiver from the NPDES electronic reporting requirements may be granted and discharge monitoring data may be submitted on paper DMR forms (MR 1, 1.1, 2, 3) or alternative forms approved by the Director. Duplicate signed copies shall be submitted to the mailing address above. See "How to Request a Waiver from Electronic Reporting" section below.

Regardless of the submission method, the first DMR is due on the last day of the month following the issuance of the permit or in the case of a new facility, on the last day of the month following the commencement of discharge.

Starting on **December 21, 2025**, the permittee must electronically report the following compliance monitoring data and reports, when applicable:

- Sewer Overflow/Bypass Event Reports;
- Pretreatment Program Annual Reports; and
- Clean Water Act (CWA) Section 316(b) Annual Reports.

The permittee may seek an electronic reporting waiver from the Division (see “How to Request a Waiver from Electronic Reporting” section below).

2. Electronic Submissions

In accordance with 40 CFR 122.41(l)(9), the permittee must identify the initial recipient at the time of each electronic submission. The permittee should use the EPA’s website resources to identify the initial recipient for the electronic submission.

Initial recipient of electronic NPDES information from NPDES-regulated facilities means the entity (EPA or the state authorized by EPA to implement the NPDES program) that is the designated entity for receiving electronic NPDES data [see 40 CFR 127.2(b)].

EPA plans to establish a website that will also link to the appropriate electronic reporting tool for each type of electronic submission and for each state. Instructions on how to access and use the appropriate electronic reporting tool will be available as well. Information on EPA’s NPDES Electronic Reporting Rule is found at: <http://www2.epa.gov/compliance/final-national-pollutant-discharge-elimination-system-npdes-electronic-reporting-rule>.

Electronic submissions must start by the dates listed in the “Reporting Requirements” section above.

3. How to Request a Waiver from Electronic Reporting

The permittee may seek a temporary electronic reporting waiver from the Division. To obtain an electronic reporting waiver, a permittee must first submit an electronic reporting waiver request to the Division. Requests for temporary electronic reporting waivers must be submitted in writing to the Division for written approval at least sixty (60) days prior to the date the facility would be required under this permit to begin submitting monitoring data and reports. The duration of a temporary waiver shall not exceed 5 years and shall thereupon expire. At such time, monitoring data and reports shall be submitted electronically to the Division unless the permittee re-applies for and is granted a new temporary electronic reporting waiver by the Division. Approved electronic reporting waivers are not transferrable. Only permittees with an approved reporting waiver request may submit monitoring data and reports on paper to the Division for the period that the approved reporting waiver request is effective.

Information on eDMR and the application for a temporary electronic reporting waiver are found on the following web page:

<http://deq.nc.gov/about/divisions/water-resources/edmr>

4. Signatory Requirements [Supplements Section B. (11.) (b) and Supersedes Section B. (11.) (d)]

All eDMRs submitted to the permit issuing authority shall be signed by a person described in Part II, Section B. (11.) (a) or by a duly authorized representative of that person as described in Part II, Section B. (11.) (b). A person, and not a position, must be delegated signatory authority for eDMR reporting purposes.

For eDMR submissions, the person signing and submitting the DMR must obtain an eDMR user account and login credentials to access the eDMR system. For more information on North Carolina’s eDMR system, registering for eDMR and obtaining an eDMR user account, please visit the following web page:

<http://deq.nc.gov/about/divisions/water-resources/edmr>

Permit Number: NC0000272

Certification. Any person submitting an electronic DMR using the state's eDMR system shall make the following certification [40 CFR 122.22]. NO OTHER STATEMENTS OF CERTIFICATION WILL BE ACCEPTED:

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations."

5. Records Retention [Supplements Section D. (6.)]

The permittee shall retain records of all Discharge Monitoring Reports, including eDMR submissions. These records or copies shall be maintained for a period of at least 3 years from the date of the report. This period may be extended by request of the Director at any time [40 CFR 122.41].

A. (6.) MIXING ZONE

[NCGS 143-215.1]

The mixing zone is defined as 0.4 miles between the diffuser and the Fiberville Bridge.

A. (7.) ENGINEERING ALTERNATIVES ANALYSIS (EAA)

[15A NCAC 02H .0105]

Prior to adding new wastewater sources to the existing discharge, the new owner must submit the Engineering Alternatives Analysis (EAA) for this facility to justify the flow. Guidance for the EAA is available to download from the Division's website - https://www.deq.nc.gov/about/divisions/water-resources/permitting/npdes-wastewater/permitting-process#Apply_NPDES

The Permittee shall submit two copies of the EAA to the Division's Central Office at the following address:

NC Division of Water Resources
NPDES Industrial Permitting Unit Supervisor
1617 Mail Service Center
Raleigh, NC 27699-1617

A. (8.) MAJOR MODIFICATION APPLICATION

[40 CFR 122.63]

Prior to adding new wastewater sources to the existing discharge, the Permittee must submit the Major Modification Application, including full characterization of the proposed waste stream (EPA Form 1 and EPA Form 2C).

The Permittee shall submit two copies of the Major Modification Application to the Division's Central Office at the following address:

NC Division of Water Resources
NPDES Industrial Permitting Unit Supervisor
1617 Mail Service Center
Raleigh, NC 27699-1617

A. (9.) PFAS MONITORING IN THE EFFLUENT

[G.S. 143-215.1(b)]

- (a) Monitoring of per- and polyfluoroalkyl substances (PFAS) shall be conducted using the most current EPA method 1633 (version January 31, 2024) and shall include all **target analytes** listed under Table 1 of the method until such time as the EPA publishes a 40 CFR part 136 Final PFAS Method for wastewater in the Federal Register, after which monitoring of PFAS shall be conducted using the approved Final PFAS Method. Monitoring takes effect the first full calendar quarter following three (3) months after the effective date of the permit (December 1, 2024) and will be at a semi-annually frequency.
- (i.) Appendix A has been added to the permit to identify the current parameters listed under Table 1 of the Method 1633 Analysis of Per- and Polyfluoroalkyl Substances (PFAS) (EPA, December 2024), in Aqueous, Solid, Biosolids, and Tissue Samples and the appropriate PCS codes for use when reporting in the electronic Discharge Monitoring Reports (eDMRs). The list of parameters may also be found at:
<https://www.epa.gov/system/files/documents/2024-01/method-1633-final-for-web-posting.pdf>
- (ii.) For eDMR reporting, PFAS monitoring shall be reported under reporting outfall location PFAS1. Until PFAS monitoring is conducted using the approved Final PFAS Method for wastewater, the Permittee shall include a qualifier in their PFAS reports noting, "Draft Method 1633 used – certification waived."
- (iii.) Please note that specific considerations and protocols are required to avoid cross-contamination and minimize sample bias for PFAS. A current listing of laboratories accredited to perform EPA Draft Method 1633 can be found here:
<https://www.denix.osd.mil/edqw/accreditation/accreditedlabs/index.html>. To view the labs, search for 'Draft EPA Method 1633' under Methods. Please note that different labs are accredited for different matrices.

NOTES - Sampling and Analytical:

- The analytical methods should be the most recent versions of the analytical method(s) stated above. Sampling must be planned so that required holding times for analytical methods are met.
- EPA Draft Method 1633 is multi-lab validated with the 4th draft. Using one of the analytical laboratories included above will allow consistency in analytical method and in anticipation of a final method.
- The Division considers "J" flag values valid and relevant in the decision-making process and hence all "J" flag values should be reported.
- Laboratories approved for Aqueous matrix may be utilized. Please note that the lab used does not have to be physically in the State of North Carolina.

Permit Number: NC0000272

Appendix A. PFAS Target Analytes EPA Method 1633

Target Analyte Name	Abbreviation	CAS Number	Parameter Code
Perfluoroalkyl carboxylic acids			
Perfluorobutanoic acid	PFBA	375-22-4	51522
Perfluoropentanoic acid	PFPeA	2706-90-3	51623
Perfluorohexanoic acid	PFHxA	307-24-4	51624
Perfluoroheptanoic acid	PFHpA	375-85-9	51625
Perfluorooctanoic acid	PFOA	335-67-1	51521
Perfluorononanoic acid	PFNA	375-95-1	51626
Perfluorodecanoic acid	PFDA	335-76-2	51627
Perfluoroundecanoic acid	PFUnA	2058-94-8	51628
Perfluorododecanoic acid	PFDoA	307-55-1	51629
Perfluorotridecanoic acid	PFTTrDA	72629-94-8	51630
Perfluorotetradecanoic acid	PFTeDA	376-06-7	51531
Perfluoroalkyl sulfonic acids			
Perfluorobutanesulfonic acid	PFBS	375-73-5	52602
Perfluoropentanesulfonic acid	PFPeS	2706-91-4	52610
Perfluorohexanesulfonic acid	PFHxS	355-46-4	52605
Perfluoroheptanesulfonic acid	PFHpS	375-92-8	52604
Perfluorooctanesulfonic acid	PFOS	1763-23-1	52606
Perfluorononanesulfonic acid	PFNS	68259-12-1	52611
Perfluorodecanesulfonic acid	PFDS	335-77-3	52603
Perfluorododecanesulfonic acid	PFDoS	79780-39-5	52632
Fluorotelomer sulfonic acids			
1H,1H,2H,2H-Perfluorohexane sulfonic acid	4:2FTS	757124-72-4	52607
1H,1H,2H,2H-Perfluorooctane sulfonic acid	6:2FTS	27619-97-2	52608
1H,1H,2H,2H-Perfluorodecane sulfonic acid	8:2FTS	39108-34-4	52609
Perfluorooctane sulfonamides			
Perfluorooctanesulfonamide	PFOSA	754-91-6	51525
N-methyl perfluorooctanesulfonamide	NMeFOSA	31506-32-8	52641
N-ethyl perfluorooctanesulfonamide	NEtFOSA	4151-50-2	52642

Permit Number: NC0000272

Target Analyte Name	Abbreviation	CAS Number	Parameter Code
Perfluorooctane sulfonamidoacetic acids			
N-methyl perfluorooctanesulfonamidoacetic acid	NMeFOSAA	2355-31-9	51644
N-ethyl perfluorooctanesulfonamidoacetic acid	NEtFOSAA	2991-50-6	51643
Perfluorooctane sulfonamide ethanols			
N-methyl perfluorooctanesulfonamidoethanol	NMeFOSE	24448-09-7	51642
N-ethyl perfluorooctanesulfonamidoethanol	NEtFOSE	1691-99-2	51641
Per- and Polyfluorother carboxylic acids			
Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6	52612
4,8-Dioxa-3H-perfluorononanoic acid	ADONA	919005-14-4	52636
Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1	PF002
Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5	PF006
Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6	52626
Ether sulfonic acids			
9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid	9Cl-PF3ONS	756426-58-1	PF003
11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid	11Cl-PF3OUdS	763051-92-9	PF004
Perfluoro(2-ethoxyethane)sulfonic acid	PFEESA	113507-82-7	52629
Fluorotelomer carboxylic acids			
3-Perfluoropropyl propanoic acid	3:3FTCA	356-02-5	PF001
2H,2H,3H,3H-Perfluorooctanoic acid	5:3FTCA	914637-49-3	PF007
3-Perfluoroheptyl propanoic acid	7:3FTCA	812-70-4	PF005