

ENVIRONMENTAL REQUIREMENTS

I. Chemicals

A. Approval for Use on Site:

All chemicals/materials to be brought onto International Paper's property during the course of a job must have prior written approval. Please see the Hazard Communication Program section for Chemical Approval information and requirements. Environmental Engineering will review the chemicals to be used for environmental hazards, spill response and clean-up requirements, and waste disposal issues.

The Request for Chemical Approval form (see appendix) shall be completed by the contractor with MSDS's attached, and returned to the Contractor Manager to route for approval. In response to the chemical approval request, the Contractor (via the Contractor Manager) will receive chemical handling procedures from Environmental Engineering and Loss Prevention. The contractor is required to handle all chemicals in accordance with these requirements.

If the chemical does not meet International Paper's approval standards, it will not be allowed on the premises, and the contractor will have to choose a substitute material that can be approved by International Paper.

The contractor is responsible to update the chemical material inventory and MSDS's as necessary during the course of the job. Review by the Loss Prevention Department and Environmental Engineering is required before introducing a new chemical material to the job site.

B. Containment Requirements

1. Storage and Handling of Petroleum Substances

a) Any contractors storing and handling petroleum substances must have proper secondary containment/diking of the area. Secondary containment must be capable of containing the entire contents of the largest single oil compartment. This applies to barrels, portable oil tanks, and generators.

b) Petroleum storage greater than or equal to 660 gallons, Environmental Engineering must be notified of the volume, location and estimated time of storage. This tank size requires proper registration with the State of Virginia if brought on site.

2. Temporary Chemical Handling Guidelines

Each chemical brought on site must go through International Paper's chemical approval process before use. Environmental Engineering and Loss Prevention will review the chemicals and make recommendations for handling. If the chemical is subject to external reporting if a release to the environment would occur, the following criteria must be met:

a) All temporary storage units will be contained for 100% of the unit volume if the chemical may have significant impact to the effluent treatment system or if the chemical has a reportable quantity and may contact soil or gravel easily.

b) Unloading that occurs in areas that are not normally used for chemical unloading should have containment for connections, pumps, flexible hoses, etc. to minimize releases. Someone should observe the chemical transfer at all times and be prepared to stop the chemical transfer should a connection fail.

c) All chemical containers will be labeled to meet OSHA/DOT requirements and will be labeled with NFPA or HAZCOM labels.

d) Should a release of the chemical occur outside or within the containment area, refer to the spill clean-up and disposal criteria noted in the Environmental Review section of the chemical's chemical profile

C. Spill Response

1. Reporting Spills & Spill Clean-Up

a) Oil/Petroleum Spills to Ground

If anyone notices a leak or spill of petroleum/oil/diesel fuel to the ground, they should immediately stop the leak (if possible), and notify the IP Contractor Manager. The Contractor Manager should immediately notify Environmental Engineering to determine clean-up and disposal requirements. Federal regulations require immediate clean-up of oil spilled to the ground.

b) Oil/Petroleum Spills to River or Stream

In the event of an oil spill to the Blackwater River or to area streams or bodies of water:

(1) Immediately stop the leak if possible, and notify the IP Contractor Manager. If the Contractor Manager is not available, notify a product department supervisor or the Main Gate (569-4434).

(2) The International Paper person notified of the oil spill must report the spill (regardless of the spill size) to the On-Call Environmental Engineer. Report the location of the spill, the time the spill was sighted and approximate amount released.

c) Transformer Fluid Spill Response

(1) If an electrical transformer is releasing fluid, the contractor shall immediately notify International Paper's Contractor Manager. The Contractor Manager must immediately follow the instructions given in the International Paper Franklin Mill Safety and Health Manual, Section AAA (Transformer Fluid Release Response)

(2) If a spill is discovered in a control room, all doors to the control room should be closed and all fans turned off. **Individuals should not enter the control room without appropriate respiratory protection.**

d) Chemical Spills

(1) The Chemical Review Procedure provides a means to determine which chemicals contractors use on site have specific spill response requirements. Review the environmental review section of the chemical approval for guidance in the event of a spill.

(2) In the event of a release of any substance into the air, ground or water (river), the contractor shall

(a) Stop the release if possible, and

(b) Immediately report the occurrence to the International Paper Contractor Manager, or, if not available, to a International Paper production department supervisor

(3) The contractor is still required to make appropriate notifications to Federal and State authorities if the contractor is responsible for a reportable release to the environment.

(4) The contractor is responsible for the clean-up of the spill to International Paper's specifications. The International Paper Hazardous Waste Management Policy must be followed in the event hazardous wastes are generated from the chemical release.

e) Sanitary Waste Spills

Discharge of sanitary waste to the process sewer, storm water sewer, or river is a violation of the mill's VPDES (Virginia Pollutant Discharge Elimination System) Permit. Prevent sanitary waste from reaching the process sewer, the storm water sewer, or the river. In the event of a spill or leak, the On-Call Environmental Engineer must be immediately notified by contacting the main gate at ext. 4434

Every effort should be made to contain any spill in the manner as to not to expose workers directly to the sanitary waste. Clean up of sanitary waste shall be performed by personnel trained in handling of sanitary waste.

The following list deals with some potential sanitary waste issues.

(1) Sanitary sewer lines are located in the pipe racks throughout the mill. An up to date mill wide sanitary sewer drawing is available to locate these lines.

(2) Portable toilets should not be located near inlets to any sewer or near the river. Earthen berms or pans can be used to safeguard against spills reaching the area when no other site is available.

2. Control of pH to Mill Wastewater System

If the pH of the chemical is the only environmental issue regarding disposal or spill guidelines, the following criteria will need to be met before allowing to sewer:

a) Any substance with a pH of less than 2.0 or above 12.5 should be recovered and returned to the process. Any substance that cannot be recovered must be treated in a totally enclosed tank system (such as, for example, our digesters after acid cleaning) so it is neutralized before being allowed to enter the plant's effluent treatment system. Dilution in our sewers may not be considered to accomplish neutralization.

(1) High pH chemicals must be neutralized to <12.5 pH according to a recently calibrated pH meter.

(2) Low pH chemicals must be neutralized to >2.0 pH according to a recently calibrated pH meter.

b) If a corrosive spill should occur, all available contractor resources will be applied to contain the spill, reclaim it to the process and minimize losses to the sewer or the environment. Full spill prevention and immediate notification to the area department will take place regardless of the quantity of the spill

c) Chemical spills that exceed normal sewer pH levels should be reported to the Environmental Facilities Operator (EFO) at ext. 5591 or ext. 4153 if lost to the sewer system.

(1) Bleach Plant Sewer pH limits: report to the EFO if <3.5 or >9.0 pH

(2) Main Mill Sewer pH limits: report to the EFO if <6.0 or >12.3 pH

II. Connections or Modifications to Mill Systems

A. Mill Drinking Water System Changes

Any contractor's permanent or temporary connections to or modifications of the mill drinking water system must be reviewed with Environmental Engineering and approval given by Environmental Engineering and the Mill Manager before work begins. This review is necessary to prevent inadvertent cross-connections between process piping and the drinking water systems. Such cross-connections could result in contamination and possible adverse effects on human health. This approval is also necessary because drinking water system drawings submitted to Virginia Department of Health need to be kept up-to-date. Consult the IP Project Manager to verify this approval has been received before making connection or modifications.

The contractor will be responsible for the proper disinfection of all water mains and/or drinking water lines that are impacted by a connection to or modification of the drinking water system by the contractor.

B. Mill Water System Changes

All Modifications to the mill water system must be approved by following the Mill Water System Management of Change Procedure (located in the Franklin Mill Environmental Manual). Up-to-date mill water system drawings may be available from the IP Contractor Manager.

C. Sanitary Sewer System Changes

Any new sanitary sewer piping should be thoroughly checked for quality installation and pressure tested for leaks as per IP piping specifications of sanitary sewer PVC piping prior to being put into service.

All Modifications to the sanitary sewer system must be approved by following the Sanitary Sewer Management of Change Procedure (located in the Franklin Mill Environmental Manual). An up to date mill wide sanitary sewer drawing is available to locate these lines.

III. Disposal Issues

A. Empty Container Disposal

1. Special handling is required for all chemical containers five (5) gallons in volume or more. Contractors are responsible for disposing of their empty containers in accordance with International Paper policy and Federal law. The International Paper Chemical Approval process contains specific information for disposal of empty containers for each Contractor chemical. Look in the Environmental Review section for proper empty container disposal instructions.

2. All chemical containers must be properly labeled to indicate the chemicals that are or were in the container. All chemical containers used by a contractor must be removed from International Paper property prior to the end of the job. Residual material or rinsate from the cleaning of containers must be disposed of properly according to the chemical that was in the container and the type of chemical used in the rinsing, and International Paper disposal policies. Contractor Managers may review the International Paper Empty Container Disposal Policy for further information (located in the Franklin Mill Environmental Manual).

3. Any container that is being reused by a contractor for other than its original purpose must be labeled or stenciled to indicate its intended use. Old labels or markings must be removed or covered over by paint or similar methods.

B. Unused and Waste Chemicals

1. The Chemical Review Procedure provides a means to determine which chemicals contractors use on site have specific disposal requirements. Review the environmental review section of the chemical approval for disposal guidance.

2. Chemicals are not considered a waste until they are no longer planned for further use and the contractor plans to discard the material. Environmental Engineering recommends the contractor or International Paper employees use the chemical on other jobs on-site or use it on other contract jobs.

C. Asbestos

All asbestos must be disposed of in an environmentally safe manner. Contractors handling asbestos that needs to be disposed must contact Environmental Engineering. The asbestos waste must be sent to a International Paper approved landfill and the manifest document must be approved by Environmental Engineering.

D. PCBs

Prior to any job involving work on, near, or within control rooms containing PCB or PCB-contaminated transformers or large PCB capacitors, the following requirements must be reviewed by the contractor:

1. Contractor personnel shall be trained on safety considerations needed when working around PCBs and retrofit units containing perchloroethylene/ tetrachloroethylene (see MSDS sheets for these chemicals).

2. PCB waste may be disposed only at International Paper approved PCB disposal sites. All PCB shipping manifests must be approved and signed by Environmental Engineering.

E. Landfill Hauling Guidelines

1. Contractors are responsible for the disposal of wastes generated by materials (chemicals, food products, etc.) brought on-site. Contractor wastes may not be disposed of on International Paper property.

2. Contractors hauling International Paper wastes (construction/demolition debris, etc.) must notify the IP Contractor Manager before hauling any material to the landfill. The IP Contractor Manager should contact Environmental Engineering to verify that all material to be sent is specified in IP's landfill permit.

3. Trucks must be free of any materials that may fall on the road going to and coming from the landfill.

4. All loads must be logged into the landfill electronic access system in accordance with the International Paper Landfill Access System Operation Procedures. Landfill access cards may be checked out from the Main Gate Security Guard. If the access system is not working, loads must be logged on a log sheet provided by International Paper.

5. Entrances to the landfill must remain locked at all times.

6. No loads containing free draining liquids may be hauled to or disposed of in the landfill. Free draining liquids may be determined by visual inspection for standing water.

7. No hazardous chemicals or waste may be disposed of in the IP landfill.

F. Empty Aerosol Can Puncturing

1. Empty aerosol cans may not be disposed of in International Paper dumpsters. Nor may empty or full aerosol cans that will no longer be used (that are waste material) leave the International Paper facility for disposal elsewhere.

2. Contractors shall collect aerosol cans for disposal at the contractor work site. Before leaving the site, or when the aerosol can collection location needs to be emptied, the Contractor or Contractor Manager must contact Environmental Engineering for an appropriate aerosol can puncturing location.

G. Hazardous Waste Management

1. Contractor Responsibility - The Chemical Review Procedure provides a means to determine which chemicals contractors use on site have the potential to be hazardous waste. The Contractor is responsible for adhering to the disposal guidance given in the environmental review section of the chemical approval. The contractor is responsible for complying with this policy and with State and Federal Regulations associated with chemicals used.

2. Contractor Training Requirements - All contractors using chemicals that may generate hazardous wastes must provide hazardous waste training to their employees. The Federal Regulation entitled Resource Conservation and Recovery Act (RCRA) requires initial training prior to beginning work. Annual updates are also required.

3. Information to Environmental Engineering -

a) The Chemical Review Procedure will provide basic information requirements to Environmental Engineering.

b) From this information, Environmental Engineering will make a determination of whether any discarded chemicals from the contractors process is a hazardous waste.

4. Hazardous Waste Identification Process

a) Environmental Engineering will provide the Contractor Manager with a description of hazardous waste that may be generated from unused chemicals through the chemical review procedure. The Contractor is responsible for adhering to the disposal guidance given in the environmental review section of the chemical approval.

b) The Contractor Manager is International Paper's responsible party. The On-site Contractor Foreman is the Contractor responsible party.

5. Contractor Satellite Accumulation Area (CSAA) Set-Up

a) Hazardous waste that is generated must be collected in a Contractor Satellite Accumulation Area (CSAA). The CSAA is limited to 55 gallons of hazardous waste.

b) When the Contractor contacts Environmental Engineering, Environmental Engineering will issue the CSAA kit for the contractor work site. The following are requirements for the CSAA and the drum within the CSAA:

(1) The Contractor Manager must supply an appropriate 55 -gallon steel drum that is DOT approved for hazardous wastes through a storeroom requisition for small jobs or a purchase requisition for large, planned jobs.

(2) The Contractor must keep the CSAA locked at all times, except when the contractor is performing work in the immediate area.

(3) Only the Contractor(s) approved for using the CSAA may use it.

(4) Only the waste designated for management at the CSAA may enter it. Do not combine wastes unless specifically approved by Environmental Engineering.

c) If a Contractor needs to use a tank rather than a container for hazardous waste accumulation, contact Environmental Engineering prior to the start of the project to make necessary arrangements.

6. Labeling Requirements

a) The Contractor Manager must post a sign on the CSAA or near the CSAA that states: "Hazardous Waste Satellite Accumulation Area"

b) All Containers must be labeled and marked according to RCRA and DOT (Department of Transportation) regulations. Environmental Engineering will supply this information to the contractor when contacted for the CSAA set-up.

7. Empty Container Management

a) Follow the Empty Container Disposal section for all empty containers.

8. Contractor Manager Inspections

a) The Contractor Manager must perform weekly inspections of the CSAA. The Satellite Accumulation Area Inspection Form (see appendix) shall be used to note problems or lack thereof. Problems found at any time must be corrected immediately.

b) A copy of the Satellite Accumulation Area Inspection Form shall be sent to Environmental Engineering on a weekly basis. See the Inspection Form for issues requiring correction.

9. Movement of Containers from CSAA Location

a) Once the container is full, the Contractor must note the final fill date and arrange to have the container enter the Hazardous Waste Storage Building within 48 hours. The Contractor should contact the Contractor Manager for a new container when the existing one is approaching fill capacity, so that a container is always available for waste accumulation.

b) The Contractor Manager should contact the International Paper Maintenance Supervisor of Environmental Facilities to open the Hazardous Waste Storage Building.

c) The Contractor retains responsibility for the drum until it has been inspected and accepted for entrance into the Hazardous Waste Storage Building by the International Paper Maintenance Supervisor of Environmental Facilities.

d) The following items must be completed by the Contractor before moving the drum to the Hazardous Waste Storage Building: Ensure:

(1) the bungs are tight for "closed top drums" or the ring is in place and closed properly for "open top drums",

(2) the drum is properly labeled,

(3) the drum is in good condition (no rusting, no paint on the outside, no indication of spill or leaking, etc.), and

(4) the drum label is dated with the final fill date.

10. Closing the CSAA (Job Completion)

a) Before the Contractor may leave the site, the Contractor and the Contractor Manager must complete a final inspection of the CSAA site for spills, leftover drums, etc.

b) The Contractor must return the CSAA containment and any other unused materials to Environmental Engineering.

c) The Contractor must complete the Satellite Accumulation Final Inspection Form (see appendix) and immediately send a copy to Environmental Engineering.

11. Attachments Located in the Appendix

a) Satellite Accumulation Area Inspection Form

b) Satellite Accumulation Area Final Inspection Form

Satellite Accumulation Area Inspection Form

Accumulation Area # _____ Location _____

Waste Description _____

Contractor Manager (if CSAA) or Responsible Person (if USAA): _____

Condition of Containers: (explain any yes answers below in comments section)

Rusted	Yes	No	
Dented	Yes	No	
Bungs not in place & tightened	Yes	No	N/A
Leaking	Yes	No	
Missing or Loose Locking Ring	Yes	No	N/A

Secondary Containment: (explain any yes answers below)

Evidence of Leaks	Yes	No
Deterioration	Yes	No
Accumulation of Rainwater	Yes	No

Labeling: (explain any no answers below)

Label with words "Hazardous Waste"	Yes	No	
Accumulation Start Date _____	Yes	No	Not Full full
EPA waste code(s)	Yes	No	
Description of Contents	Yes	No	

SAA Requirements: (explain any no answers below)

Is the SAA located at or near the point of generation?	Yes	No
Is the SAA under the direct control of the operator or locked?	Yes	No
Is the capacity of the SAA 55 gallons?	Yes	No

Comments:

Deficiencies Reported To: Contractor (for CSAA) or UC Supervisor (for USAA) - (state person contacted & phone number)

Actions taken to correct deficiencies (this must be documented):

Inspector: _____ Ext.: _____ Date of Inspection: _____

Mail or fax copy to Environmental Engineering (fax #5256)

Satellite Accumulation Area Final Inspection Form

Accumulation Area # _____ Location _____

Waste Description _____

Contractor Manager (if CSAA) or Responsible Person (if USAA): _____

1. Have all containers been labeled properly, dated, and moved to the HWSB?
YES NO

2. Has the CSAA containment system been cleaned and returned in good condition to EE or the HWSB?
YES NO

3. Have all wastes been disposed of properly (including trash)?
YES NO

4. Is the area free of any evidence of spills?
YES NO

5. Have unused drums been returned to the Storeroom or HWSB?
YES NO

6. Have all signs indicating that this was formerly a SAA been removed and returned to EE or HWSB?
YES NO

Comments (explain any no answers to the questions above and any other extenuating circumstances):

Inspector: _____ Ext.: _____

Date of Inspection: _____ Date of end of job: _____

Mail or fax copy to Environmental Engineering (fax #5256)