Slug Discharge Control Plan

211 5th St.
Woodland, WA 98674
(360)696-1641

Emergency Contact Information

Onsite Emergency Contact(s)	Staci Mocerino (QA/Compliance Manager) Office- (360) 992-5220 Cell (24 hr.)- (503) 739-5568 Ben Smith (Plant Manager) Office- (360) 992-5234 Cell- (503) 519-2430 Mike Boster (Maintenance Manager) Office- (360) 992-5238 Cell- (360) 560-4436
Emergency Response Contact(s)	Fire/Paramedics/Police: 911 Department of Ecology: (360) 407-6300 National Response Center: (800) 424-8802
Local Emergency Medical Facility	Legacy Salmon Creek Hospital 2211 NE 139th St. Vancouver, WA 98686-2742 (360) 487-1000
Safety Data Sheets	Compliance Desk by production entrance to warehouse or electronic shared drive
Previous Incidents	This facility has not experienced a significant slug discharge or spill event during the 36 months before this certification.

Introduction:
This Slug Discharge Control Plan (SDCP or Plan) has been prepared for Portco Packaging, of 211 5th St, Woodland, WA 98674. The Plan was prepared to meet requirements of State Waste Discharge Permit Number ST 6272 (Permit) originally issued to Portco Packaging on June 24, 2022, effective July 1, 2022. Special Condition 10 of this Permit requires the Facility to prepare and submit an SDCP to minimize the potential of slug discharges from the Facility. This Plan addresses the steps the Permittee will take to keep spilled or unused chemicals out of the sanitary and storm sewers, either by intentional or accidental release, and includes notification procedures to the Washington State Department of Ecology (Ecology).

Spill Prevention:
Chemical Management: All chemical substances, including chemical wastes, are to be managed in a way that prevents release. The following general requirements are to be followed. They include:

- *Containment:*
  - All wastewater processing occurs within a large processing berm to prevent accidental spread in facility
  - There are no open sewage drains on the production floor
  - The process to release treated water into the sewage system is a manual process that requires a physical release of the water from the treatment hopper into the gondola, and then pumped into the sewage pipe, after treatment
  - All bulk chemicals (≥55 gallons) are stored within appropriate secondary containment.
  - Secondary containment will be monitored, and any spills identified in will be immediately cleaned up and removed.

- *Container Management:*
  - All containers must be in good condition and compatible with the materials stored within.
  - All containers must be accessible and spacing between containers must provide sufficient access to perform periodic inspections and respond to releases.
  - Empty containers (drums) must have all markers and labels removed over covered with spray paint or marker.
  - Any spills on the exterior of the container must be cleaned immediately.
  - Flammable materials stored or dispensed from drums or totes must be grounded to prevent static spark.
  - Do not overfill waste drums. 4” of headspace must remain to allow for expansion

- *Good Housekeeping:*
  - All chemicals must be stored inside building;
  - All hazardous substance containers must be closed while not in use;
  - Use drip pans or other collection devices to contain drips or leaks from dispensing containers or equipment;
  - Preventative maintenance activities are implemented to reduce the potential for release from equipment;
  - Immediately clean up and properly manage all spills or leaks;
  - Periodically inspect equipment and storage areas to ensure leaks or spills are not occurring;
  - Use signage to identify hazardous storage or waste collection areas;
  - Keep all work areas and hazardous storage areas clean and in good general condition.

- *Marking/labeling:*
  - Ensure all hazardous substances, including chemical wastes, are properly marked and labeled in accordance with all federal, state and local regulations.
  - Ensure that hazardous substances transferred to small containers are marked GHS approved labeling as outlined within HAZCOM program.

Employee Training: All employees must receive ongoing training (upon hire and annually thereafter) on the proper handling of hazardous substances, spill prevention practices, good manufacturing practices/housekeeping, and emergency response procedures. Training will include a review of the spill prevention and emergency response plan, and a review of location and use of emergency response equipment. Training will be recorded through planned meetings, training registers, or other equivalent record keeping indicating the date of training, employee name, and topics covered.

Hazardous Substance Inventory: An inventory will be maintained for all hazardous substance stored in quantity of 1-55 gallons, and/or list of locations where non-bulk hazardous substances are stored.

Spill Response Equipment: Spill response equipment must be maintained and located in areas where spills are likely to occur. Spill kits should provide adequate response capabilities to manage any anticipated spill or release. The following general requirements are to be followed: They include:

- Stock spill clean up kits that are compatible with the hazardous substances stored on site;
- Locate spill kits in areas where spills are likely to occur.
- Spill kits should be sized to managing an anticipated release.
- Emergency response equipment should be inspected periodically to ensure that the spill kit is complete.

Spill Response Equipment:

Locations	Spill Equipment Content/Inventory
Press Department	55 gallon drum with HAZMAT Supplies: PPE gloves, absorbent snake socks, absorbent pads, caution tape.
Lamination Department	55 gallon drum with HAZMAT Supplies: PPE gloves, absorbent snake socks, absorbent pads, caution tape.
Ink Department	55 gallon drum with HAZMAT Supplies: PPE gloves, absorbent snake socks, absorbent pads, caution tape.
Maintenance Department	55 gallon drum with HAZMAT Supplies: PPE gloves, absorbent snake socks, absorbent pads, caution tape.
Material Handling	55 gallon drum with HAZMAT Supplies: PPE gloves, absorbent snake socks, absorbent pads, caution tape.

Emergency Response Plan:

The Emergency Response Plan is a facility specific plan for dealing with emergencies and shall be implemented immediately whenever there is a fire, explosion, or release of a substance that threatens human health or the environment. The emergency response plan shall be reviewed and immediately amended whenever:

- The plan fails in an emergency;
- The facility changes in its design, construction, operation, maintenance, or other circumstances in a way that increases the potential for fire, explosions, or release of a hazardous substance;
- The list of emergency contacts change; or
- The list of emergency equipment changes.

Response actions in the event of a spill or release:

In the event of a substance spill or release, immediately take the following measures to keep the spill from entering sewer or storm drains, spreading off-site, or affecting human health. In all cases caution and common sense must be maintained with the primary goal being to prevent and/or limit personal injury.

Stop, contain, and clean up the chemical spill if:

- The spilled chemical and its hazardous properties have been identified;
- The spill is small and easily contained;
- Responder is aware of the chemicals' hazardous properties.

If a spill or release cannot be controlled or injuries have occurred due to the release the following procedures should be implemented:

- Summon help or alert others of the release;

- Evacuate immediate area, and provide care to the injured- Call 911;
- If potential fire or explosion hazards exist initiate evacuation procedures- Call 911;
- Respond defensively to any uncontrolled spills:
  - Use appropriate personal protective equipment when responding to any spill;
  - Attempt to shut off the source of the release (if safe to do so);
  - Eliminate sources of ignition (if safe to do so);
  - Protect drains by use of adsorbent, booms or drain covers (if safe to do so).
- Notify onsite emergency contact(s);
- Notify other trained staff to assist with the spill response and cleanup activities;
- Coordinate response activities with local emergency personnel (fire department);
- Be prepared to provide SDS information to fire department, EMT, hospital or physician;
- Notify appropriate agency if a release has entered the environment. Refer to Notification and Reporting section for reporting thresholds.

Evacuation Procedures:
In the event of a hazardous substance release that has the potential for fire, explosion or other human health hazards the following procedures will be implemented:

- Facility staff will be notified of evacuation by one or more of the following method(s): Verbal, Intercom, Portable Radio, and/or Alarm.
- Notification to emergency services will be performed- Call 911.
- Facility staff will follow predetermined evacuation routes and assemble at designated areas. Evacuation maps are displayed throughout the facility.
- Individuals responsible for coordinating evacuations must confirm if the business has been completely evacuated.
- Facility staff will be made familiar with evacuation procedures during new employee orientation, and annual trainings thereafter.
- Designated emergency response contacts will coordinate all activities with outside emergency personnel.

Spill Cleanup and Disposal:
In the event of a hazardous substance release spill cleanup materials are to be properly characterized to determine if it designates as a Washington State Dangerous Waste. The designated onsite emergency contact, with the assistance of Safety Kleen or other accredited state laboratory will determine the wastes status prior to disposal.

Reporting a Release – Regulatory:
If a spill/slug has been released to soil, surface water, or drains the following notifications must be performed:

- Fire Department
- Department of Ecology

- **Immediate Reporting**: Any noncompliance that may endanger health or the environment immediately to the Department of Ecology's Regional Office
  - Southwest Regional Office (360) 407-6300
  - Notification to the POTW will occur immediately (as soon as discovered) of all discharges that could cause problems to the POTW, such as process spills and unauthorized discharges (including slug discharges).
- **24-hour Reporting**: The following occurrences of noncompliance by telephone within 24 hours from the time the Permittee becomes aware of any of the following circumstances:
  - Any noncompliance that may **endanger health or the environment**, **unless** previously reported under immediate reporting requirements.
  - Any **unanticipated bypass** that causes an exceedance of an effluent limit in the permit
  - Any upset that **causes an exceedance of an effluent limit** in the permit. Upset means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limits because of factors beyond the reasonable control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
  - Any **violation of a maximum daily or instantaneous maximum discharge** limit for any of the pollutants.
  - **Any overflow prior to the treatment works**, whether or not such overflow endangers health or the environment or exceeds any effluent limit in the permit. This requirement does not include industrial process wastewater overflows to impermeable surfaces which are collected and routed to the treatment works.
- **5-day Reporting:**
  - A written report must be submitted within five days of the time that the Permittee becomes aware of any reportable event under Immediate or 24-Hour Reporting. The report must contain:
    - A description of the noncompliance and its cause.
    - The period of noncompliance, including exact dates and times.
    - The estimated time the Permittee expects the noncompliance to continue if not yet corrected.
    - Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
    - If the noncompliance involves an overflow prior to the treatment works, an estimate of the quantity (in gallons) of untreated overflow.

Hazardous Substance Inventory: Those materials manufactured, stored, used and/or generated as a chemical waste in quantities =/>55 gallons.

Hazardous Substance	Manufacturer	Quantity/Unit of Issue
Isopropyl Alcohol	Tarr LLC.	55 Gallon Drums
N-Propanol	Tarr LLC.	55 Gallon Drums
N-Propyl Acetate	Tarr LLC.	55 Gallon Drums
Ethyl Acetate	Tarr LLC.	55 Gallon Drums
Sodium Hydroxide	Tarr LLC.	55 Gallon Drums
Ferric Chloride	Tarr LLC.	55 Gallon Drums
Gravure Blend	Tarr LLC.	55 Gallon Drums
FW 40 Anilox Cleaner	FlexoWash	55 Gallon Drums
Solvent Based Printing Ink	INX	55 Gallon Drums

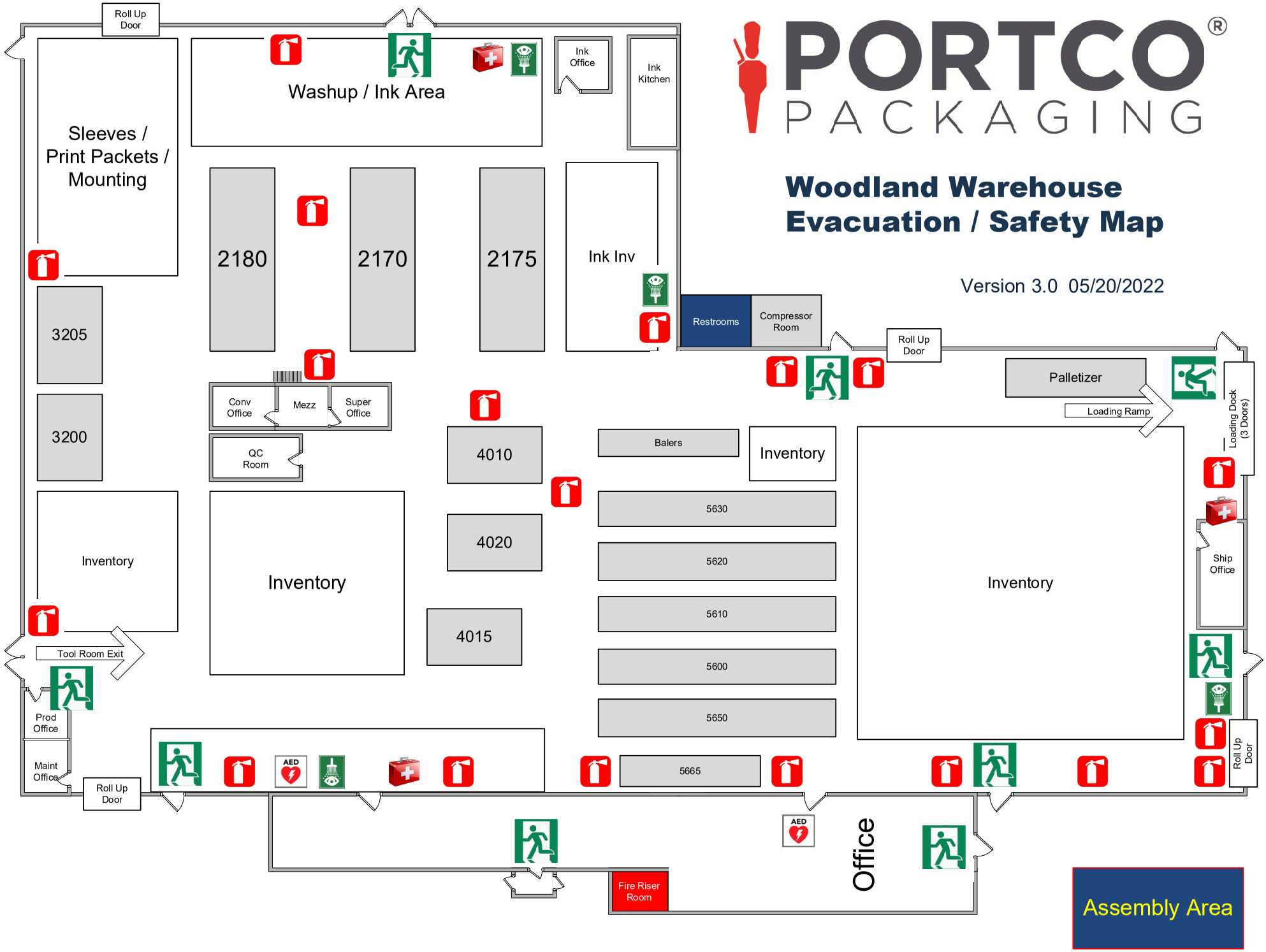
STEPS FOR WATER TREATMENT

1. Fill tank
2. Check pH and record on log
3. Add 1 ½ gallons of the Ferric Chloride and mix for 2 minutes. This should drop the pH level
4. Recheck pH. Should have a pH reading of 6.5-7. If pH reading above that, add more Ferric Chloride
5. Add ½ gallon of Sodium Hydroxide to bring pH back up to a reading of 8-8.5. Mix for 2 minutes.
6. Add 2 ½ scoops of ME-K-4 (flocculent) to bring pH down to around 7.5.
7. Let mix for 5 minutes *
8. Once water is separated crack open upper valve to start bleeding off the water
9. Once you start getting the separated ink coming out close upper valve
10. Open lower valve and fill the bed with the separated ink.
11. Once the bed is full let it sit for 15 minutes to drain water.
12. After 15 minutes advance the white filter cloth to dump the separated ink into the dumpster
13. Repeat steps 10-12 till the tank is drained.

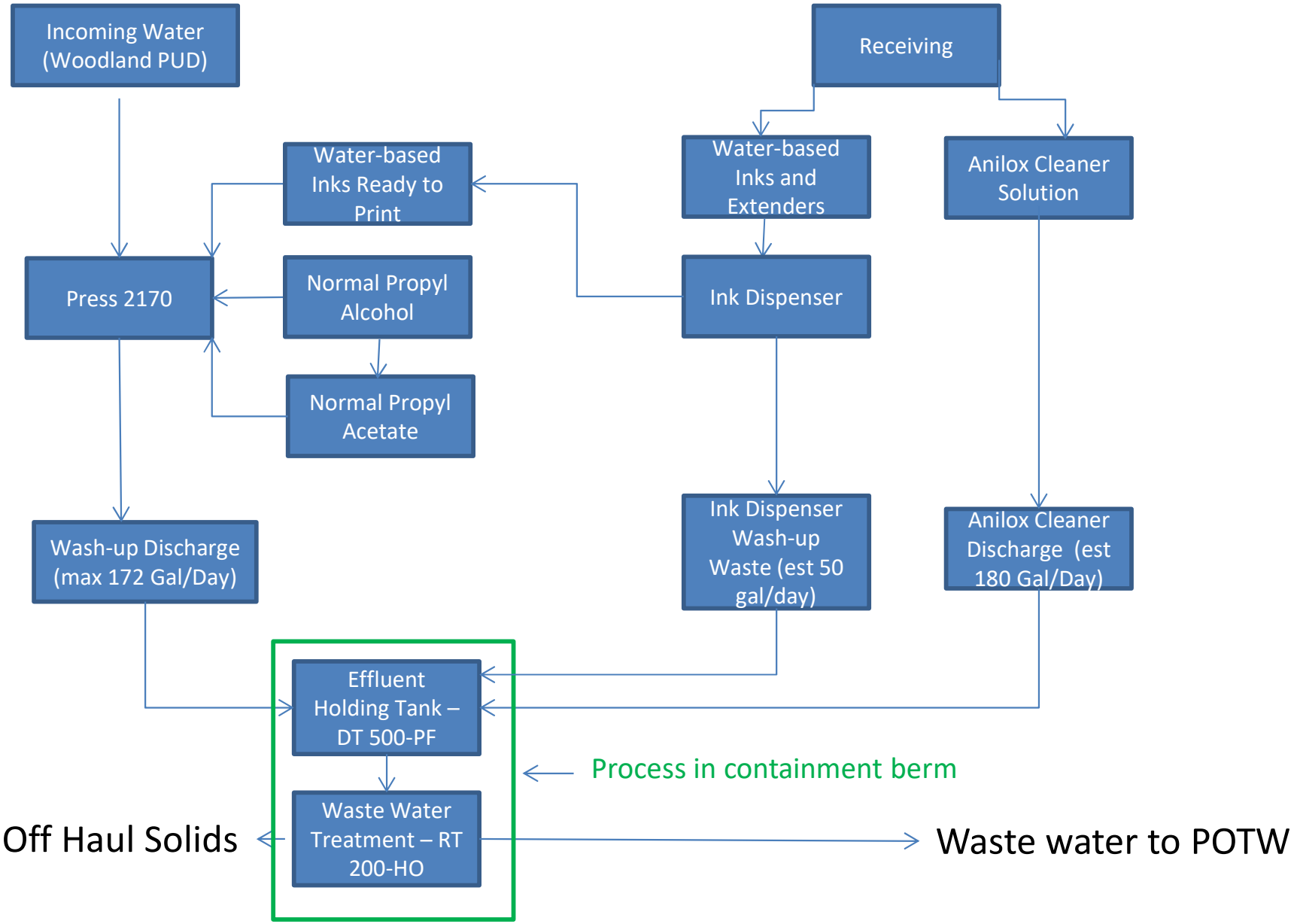
*If the water does not start separating after letting it mix for 5 minutes recheck the pH level. If the level is still high by a half a point or so add another ½ scoop of ME-K-4 mix for 5 minutes and recheck.

If the pH level is off more than +/- a point, adjust with Ferric Chloride or Sodium Hydroxide to get the desired PH level and water should start separating.

Samples will be collected monthly for analysis by a Washington State accredited third party lab for all components listed in the Discharge Permit. Continuous pH monitoring occurs from the sump below the hopper with readings being recorded electronically each minute. Flow is also recorded continuously by an installed flow meter. Since discharge occurs in batches, the batches are tallied up per day when the data is read from the instrument and submitted to the state.


PORTCO®
PACKAGING
Woodland Warehouse
Evacuation / Safety Map
Version 3.0 05/20/2022
Roll Up Door
Washup / Ink Area
Ink Office
Ink Kitchen
Sleeves / Print Packets / Mounting
2180
2170
2175
Ink Inv
3205
3200
Restrooms
Compressor Room
Roll Up Door
Palletizer
Loading Ramp
Loading Dock (3 Doors)
Conv Office
Mezz
Super Office
QC Room
4010
4020
4015
Balers
Inventory
5630
5620
5610
5600
5650
Inventory
Inventory
Inventory
Ship Office
Tool Room Exit
Prod Office
Maint Office
Roll Up Door
AED
5665
AED
Office
Fire Riser Room
Roll Up Door
Assembly Area

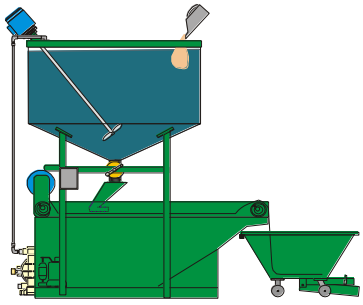
B1: Water-based ink Printing

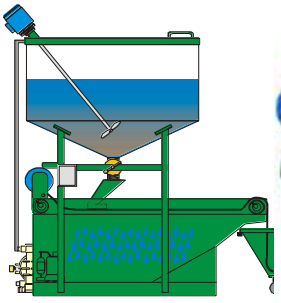


Wastewater Management
Simple, Safe, and Cost Effective

- Sophisticated yet user-friendly technology.
- Guaranteed to meet local sewer discharge limits.
- Excellent choice for recycling.
- Clear advantages over ultra-filtration and evaporation.
- No hazardous by-products.
- Compact: typical dimensions are only 80” x 70”
- Batch Sizes of 65, 100, 200, 350, 500, 750, and 1000 Gallons. Batch cycle takes 30 minutes and requires only 10 minutes of low skilled attendance.
- Very low maintenance: WE, Inc. offers a 3- year, 100% parts replacement warranty.
- Handles almost any aqueous based fluid, including metal plating, vibratory, equipment and parts washing, floor cleaning, metal working fluids, etc.

The Heart of the “Turn-Key” System





Stage One

The RT Unit is filled with effluent. The turbine mixer is started and WE Reactant is added. After (5) minutes of mixing a large floc will form. The mixer is then stopped and settling of the floc to the bottom of the tank occurs, usually in a couple of minutes.

Stage Two

Once the settling, or phasing, of the floc has occurred, draining and filtering begins. Clarified water from the upper area of the tank is drained first, followed by the floc (sludge). Filter media captures the solids, allowing the clarified water through to a clean compartment. A discharge pump automatically transfers the fluids to sewer or recycling vessel.

Stage Three

An automated conveyor advances the filter media and sludge as needed. This usually requires only (5) feet of filter media. An included self-tipping sludge gondola captures the filter media and sludge for disposal. The sludge dries to a cake, without need of a filter press. The process is now complete. The water will pass local discharge limits, and the sludge will pass TCLP.

Wastewater Engineers, Inc.
Wastewater Treatment Specialists

Oxford, MI 48371
Phone: (248) 236-9800
Fax: (248) 236-9870

Unit	Batch Size	Capability (up to)	Dimensions (L x W x H)	Filter	Electrical	Control Options
RT-65-DB	**65 gal.**	**130 gal. /hr**	**46”x40”x84”**	**Dump Bag**	**115VAC**	**Manual**
RT-65-HO	**65 gal.**	**130 gal. /hr**	**46”x40”x84”**	**Dump Bag**	**115VAC**	**Semi Auto**
RT-100-HO	**100 gal.**	**200 gal. /hr**	**70”x39”x84”**	**29” Roll**	**115VAC**	**Semi Auto**
RT-200-HO	**200 gal.**	**400 gal. /hr**	**74”x48”x92”**	**33” Roll**	**240/480VAC**	**Semi/Full Auto**
RT-350-HO	**350 gal.**	**700 gal. /hr**	**86”x60”x93”**	**44” Roll**	**240/480AC**	**Semi/Full Auto**
RT-500-HO	**500 gal.**	**1000 gal. /hr**	**96”x72”x96”**	**44” Roll**	**240/480VAC**	**Semi/Full Auto**
RT-750-HO	**750 gal.**	**1500 gal. /hr**	**120”x90”x105”**	**52” Roll**	**240/480VAC**	**Semi/Full Auto**
RT-1000-HO	**1000 gal.**	**2000 gal. /hr**	**120”x90”x114”**	**52” Roll**	**240/480VAC**	**Semi/Full Auto**

RT-65-DB
RT-65-HO

- Designed for the low volume generator, these units feature a pull out cart and filter.
- The *base model* includes an on/off switch and an on-board, float-activated discharge pump – for transferring treated fluids to sewer or recycle vessel. No special skills are required to operate. A full cycle requires about (15) minutes of attendance.
- *HO model* comes equipped with an electrical control panel, an on-board auto sump pump. An auto fill function: simply push “fill start” button and the on-board pump will draw fluids from storage source into the mix tank. Other features include a rinse down package, countdown mixer timer and a final stage canister filter. A cycle requires only (5) minutes of attendance.
- Both models utilize a reusable filter bag that can handle from 2 to 5 batches of sludge before emptying is required.
- 3-year, 100% parts replacement warranty

RT-100-HO
RT-200-HO
RT-350-HO
RT-500-HO
RT-750-HO
RT-1000-HO

- All HO models are semi-automatic and engineered to be operated by custodial personnel.
- Operator simply pushes “fill start” on the control panel to activate the “auto fill” function. An on-board pump will draw fluids from storage vessel and continue to transfer effluent until ‘full’ capacity is reached. A float sensor will deactivate the transfer pump, and illuminate a “RT Full” light on the control panel.
- Operator then sets the countdown mixer timer, adds Reactant and allows (5) minutes for a reaction to occur, e.g. separation of contaminants from water.
- Operator will allow (1) minute for settling, then open the drain/filter valves.
- The entire process limits operator attendance to approximately (10) minutes per batch – regardless of the model size.
- Other features include electrical control panel, rinsing package, auto-indexing filter bed, self-tipping sludge gondola, final stage canister filter, and an on-board discharge pump for clarified liquid.
- Further options include fully automatic package (totally operator free), choice of 240 or 480VAC, choice of many more labor saving/convenience features. Please talk to your WE, Inc. Salesperson for details.
- The most noteworthy feature of all RT units **and** accompanying systems components is our 3-year, 100% parts replacement warranty!