Spill Prevention, Control, and Countermeasure Plan

for

Inland Empire Paper Company
Spokane, WA

January 2023

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Engineer's Certification - §112.3(d)

I hereby certify that I am familiar with the provisions of 40 CFR 112; my agent or I have visited and examined the facility; this SPCC Plan has been prepared in accordance with the regulations and with good engineering practices, including consideration of applicable industry standards; the facility has established procedures for inspections and testing; and, this SPCC Plan is adequate for the facility.

Signature:_____ Date 1/26/2023

Name: Allison Esvelt, P.E.
Registration No.: WA State PE #34876
Title: Environmental Engineer
Esvelt Environmental Engineering

(PROFESSIONAL SEAL)

Management Approval - §112.7

The same persons signing the following written commitment to respond to a discharge, have reviewed the "Applicability of Substantial Harm Criteria," included in Appendix A, and their signature applies to both items.

Owner/Operator's Written Commitment to Respond to Discharge

As the owner/operator of this facility, Inland Empire Paper Company has made a commitment to the prevention of discharges of oil to navigable waters and the environment, and maintains the highest standards of spill prevention control and countermeasures through regular review, updating, and implementation of this SPCC Plan for the newsprint mill in Spokane, Washington.

Authorized Owner/Operator's Representative

Name: Kevin Rasler
President and General Manager

Signature: _____ Date:_____

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Signature: Allison M.Z Esvelt Date 1/26/2023

Name: Allison Esvelt, P.E.
Registration No.: WA State PE #34876
Title: Environmental Engineer
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Authorized Owner/Operator's Representative

Name:Kevin Rasler
President and General Manager

Signature: K. D. Rasler Date: 2.1.23

Compliance Inspection Review - §112.5(b)

In accordance with 40 CFR 112.5(b), a review of this SPCC plan will be conducted at least once every five years. As a result of this review and evaluation, the owner or operator shall amend the SPCC Plan within 6 months of the review to include more effective prevention and control technology if: (1) Such technology will significantly reduce the likelihood of a discharge from the facility, as described in §112.1(b) of 40 CFR 112; and (2) if such technology has been field-proven at the time of the review. Implementation shall be performed within 6 months following amendment. The owner or operator shall document completion of the review and evaluation, and shall sign the statement below as to whether he/she will amend the SPCC Plan.

Statement

I have completed review and evaluation of the SPCC Plan for the Millwood Paper Plant, Spokane, Washington, and either will or will not amend the SPCC Plan as a result.

Review and Evaluation of SPCC Plan			
Review Date	Plan Amendment		Name and signature of person authorized to review this Plan
	Will Amend	Will Not Amend	
January 2023	☒	☐	Douglas P. Krapas, Environmental Manager
	☐	☐	
	☐	☐	
	☐	☐	

1. INTRODUCTION

Section 311 of the Clean Water Act establishes the authority under which the U.S. Environmental Protection Agency (EPA) has issued regulation on Title 40 of the Code of Federal Regulations (CFR) Part 112, titled "Oil Pollution Prevention and Response; Non-Transportation Related Onshore and Offshore Facilities". 40 CFR Part 112 requires the preparation of a Spill Prevention, Control and Countermeasures Plan (SPCC Plan) for those facilities that could reasonably be expected to discharge oil in harmful quantities into or upon the navigable waters or adjoining shorelines of the United States. The regulations of 40 CFR Part 112 are designed to complement existing laws, regulations, rules, standards, policies, and procedures pertaining to safety standards, fire prevention, and pollution prevention rules, so far as to form a comprehensive balanced federal and state spill prevention program to minimize the potential for oil discharges. In addition, this SPCC plan is maintained as a "Spill Plan" in accordance with Inland Empire Paper Company National Pollutant Discharge Elimination System (NPDES) Permit WA-000082-5, Section S12, and includes the elements of the spill plan specifically required in Section S12 of the NPDES permit.

This SPCC Plan has been prepared on behalf of Inland Empire Paper Company for their newsprint mill in, Spokane, Washington. This mill contains hydraulic and lubrication systems, oil-based chemicals, and oil-filled electrical equipment for the papermaking process. Additionally, several bulk storage tanks are employed to store fuel for backup diesel pumps, mobile equipment and boilers.

This SPCC Plan describes the general operating design and procedures that affect the facility's potential for the discharge of oil products. This Plan shall be kept in the office of IEP's Environmental Manager, Shift Supervisor and in all primary operator control rooms of the facility (pulp mill, boiler house, paper machine wet and dry end). The SPCC Plan shall be familiar to all personnel charged with operation and maintenance of fuel tanks, hydraulic oil systems, lubrication oil systems, oil-based chemicals, oil-filled electrical equipment, and associated piping systems.

This SPCC Plan will be amended whenever oil-containing equipment is affected by changes in facility design. Amendments will also occur if the facility's potential for discharge of oil products is affected by plant operations or maintenance.

Facilities that could reasonably be expected to cause substantial harm to the environment are required by EPA to have a Facility Response Plan. These facilities meet the substantial harm criteria. Facilities that *do not* meet the substantial harm criteria as outlined in Appendix A must complete a certification of substantial harm determination form and maintain the form as part of their SPCC Plan. The certification of substantial harm determination form is provided in Appendix A. **Inland Empire Paper Company does not meet the substantial harm criteria.**

1.1 Facility Conformance: §112.7(a)(1), §112.7(j), & §112.8(a)

This facility conforms to the requirements listed in 40 CFR 112.7 and 112.8. There are no deviations from the regulations as allowed in §112.7(a)(2). In addition, the discharge prevention and containment procedures described in this SPCC Plan have been prepared in accordance with the minimal prevention standards listed under 40 CFR 112.7 and 112.8 and any applicable more stringent State rules, regulations, and guidelines.

1.2 General Information:

Facility Name: Inland Empire Paper Company (IEP)
Type of Facility: Newsprint Manufacturing
Facility Address: 3320 N Argonne Rd
City: Spokane State: WA ZIP: 99212
County: Spokane Tel. Number: (509) 924 – 1911
Operator Name: Kevin Rasler – IEP President and General Manager
Operator Address: 3320 N Argonne Rd
City: Spokane State: WA ZIP: 99212
County: Spokane Tel. Number: (509) 924 – 1911

Contact List	
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention: Doug Krapas *Environmental Manager*	Office: (509) 720 - 5815
	Emergency: (208) 661 - 5526
Kevin Davis *Strategic Projects Manager*	Office: (509) 720 - 5826
	Emergency: (509) –999-9726
Ben Carleton *Technical Superintendent*	Office: (509) 720 - 5827
	Emergency: (208) –505-4503
Tanner Gerety *Pulp Mill Supervisor*	Office: (509) 720 - 5824
	Emergency: (509) –939-9289
John Nelson *Paper Machine Superintendent*	Office: (509) 720 - 5864
	Emergency: (509) 936 - 5898

1.3 Description of Facility: §112.7(a)(3)

Newsprint manufacturing processes including ground wood refining plant, old newspaper recycling plant, newsprint machine, effluent treatment system and boilers. Oil containers are located throughout the mill as detailed on the plant maps included in this plan.

1.4 List of Containers: §112.7(a)(3)(i)

Bulk storage containers that have a shell capacity of at least 55 gallons at this facility are included in Table 1 below. These bulk storage containers hold oils, fuels and oil-based chemicals as specified in Table 1. They are

identified by “BSA” in the column labeled “Map Symbol.” The plant maps (Appendix B) identify the location of the areas by this symbol.

In addition to Table 1, a complete list of the oil-filled operational equipment qualifying per 40 CFR 112 for inclusion in this SPCC plan, their shell capacities, and the product contained are shown in Tables 2A-2C. Actual maximum working capacities are less than the capacities shown. Capacities of oil-filled electrical equipment are taken from nameplates. Calculations of shell capacities of transformers are not practical due to the volume consumed by the internal coils. Equipment and containers at this facility with oil storage capacities less than 55 gallons are not included per 40 CFR 112.1(b)(5).

Inland Empire Paper Company’s electrical utility, Avista Utilities, owns, maintains and operates a 4160 Volt substation transformer that is located within the facility but is not listed in Tables 2A-C. This transformer is addressed in a separate SPCC plan drafted by Avista. A copy of their plan will be available with this IEP plan in all locations where this plan is available. Avista Utilities owns a set of PT’s and CT’s that are located within the facility. IEP has taken primary responsibility to respond to spills involving these units and has listed them in Table 1 below. Avista will be notified for follow-up actions as necessary after initial response.

Table 1 – List of Qualifying Oil Storage Containers and Capacities

This table includes a complete list of all oil storage containers with capacity of 55 U.S. gallons or more, unless otherwise exempt from the rule. For mobile/portable containers, an estimated number of containers, types of oil, and anticipated capacities are provided. Facility maps with container locations may be found in Appendix B.

Map Symbol	**Oil Storage Container**	**Type of Oil**	**Shell Capacity** (gallons)	**Containment Capacity** (gallons)
BSA - 1	Fire Protection Pump Diesel Tank	Diesel	217	238
BSA - 2	Truck Unloading Rack	Diesel	3000	8671
BSA - 3	Permanently Closed per §112.2	NA	18514	26232
BSA - 4	Effluent Pump Diesel Tank	Diesel	212	316
BSA - 5	100' Primary Clarifier Pump Diesel Tank	Diesel	212	316
BSA - 6	Removed from Mill Site	NA	NA	NA
BSA - 7	Bulk Storage Area - North of #4 Refiner	Misc. Oil in Drums	55	145
BSA - 8	Bulk Storage Area - #2 PM Building SW Corner	Misc. Oil in Drums	55	166
BSA - 9	Bulk Storage Area - Behind #5 PM DE Control Room	Misc. Oil in Drums	55	82
BSA - 10	Bulk Storage Area - #5 PM Building, Baylines E-F/10-11	Misc. Oil in Drums	1002	1227
BSA - 11	Bulk Storage Area - #5 PM Building, Baylines D/11	Misc. Oil in Drums	55	102
BSA - 12	Bulk Storage Area - #5 PM Building, Baylines B-C/11	Misc. Oil in Drums	55	57
BSA - 13	Bulk Storage Area - #5 PM Building, Baylines A/8-9	Misc. Oil in Drums	55	104
BSA - 14	Bulk Storage Area - Maintenance Shop	Misc. Oil in Drums	55	66
BSA - 15	Bulk Storage Area - #5 PM Building NE Corner	Misc. Oil in Drums	55	86
BSA - 16	Bulk Storage Area - #5 PM Building, Baylines F/4-6	Misc. Oil in Drums	55	77
BSA - 17	Bulk Storage Area - #2 PM Building NW Corner	Misc. Oil in Drums	55	63
BSA - 18	Mobile Equipment Diesel Tank	Diesel	500	817
BSA - 19	Bulk Storage Area - South of #5 Refiner	Misc. Oil in Drums	55	249
BSA - 20	Bulk Storage Area East of #5 Refiner	Misc. Oil in Drums	55	164
BSA - 21	Bulk Storage Area NW Corner # 2PM Basement	Defoamer	10800	10815
BSA - 22	Bulk Storage Area #2 PM Building North End	Polymer	275	516
BSA - 23	Bulk Storage Area #2 PM Building	Defoamer/Polymer	275	19905
BSA - 24	Bulk Storage Area #5 PM, Baylines A-B/6	Defoamer	275	19905
BSA - 25	Mobile Equipment Gasoline Tank	Gasoline	300	753
BSA - 26	Bulk Storage Area – Refiner Basement	Defoamer	500	550
BSA - 27	Bulk Storage Area – Dry Chemical Warehouse	Defoamer	350	390

Table 2A – List of Oil Filled Operational Equipment: Hydraulic Systems

This table includes a complete list of all oil filled operational equipment located on-site. Facility maps with container locations may be found in Appendix B.

Map Symbol	**Oil Storage Container**	**Type of Oil**	**Shell Capacity** (gallons)	**Containment Capacity** (gallons)
1	Removed from Mill	NA	NA	NA
2	Old Newspaper Truck Dumper Hydraulic Unit	Hydraulic Oil	848	1174
3	Old Newspaper Hopper Live Floor Hydraulic Unit	Hydraulic Oil	67	1174
4	#5 PM Wet End Auxiliary Hydraulic Unit	Hydraulic Oil	339	441
5	# 5PM Press Auxiliary Hydraulic Unit	Hydraulic Oil	339	400
6	#5 PM 1st Press (Kuesters) Hydraulic Unit	Hydraulic Oil	845	962
7	#5 PM 3re Press (NIPCOFLEX) Hydraulic Unit	Hydraulic Oil	3442	3466
8	#5 PM Cal Hot Oil/ Hydraulic Unit	Hydraulic Oil	2114	5981
9	#5 PM Cal #1 Oil Heating Unit	Hydraulic Oil	190	1227
10	#5 PM CAL #2 Oil Heating Unit	Hydraulic Oil	190	1227
11	#5 PM Cal Hot Oil Tank	Hydraulic Oil	622	1227
12	#5 PM Reel Hydraulic Unit	Hydraulic Oil	221	239
13	#5 PM Winder Hydraulic Unit	Hydraulic Oil	329	337
14	Roll Wrap Hydraulic Unit	Hydraulic Oil	486	542
15	Lowering Upender Hydraulic Unit	Hydraulic Oil	322	367
16	Chip Truck/Railcar Dumper Hydraulic Unit	Hydraulic Oil	2000	2187
17	Chip Truck/Railcar Dumper Hydraulic Cylinders	Hydraulic Oil	224	1550
18	Railcar Unloading Conveyor Hydraulic Unit	Hydraulic Oil	300	317
19	#5 Primary Refiner Hydraulic Unit	Hydraulic Oil	168	19905
20	#5 Secondary Refiner Hydraulic Unit	Hydraulic Oil	168	19905

Table 2B – List of Oil Filled Operational Equipment: Electrical Systems

This table includes a complete list of all oil filled operational equipment located on-site. Facility maps with container locations may be found in Appendix B.

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
CT	Avista Owned West Transformer - Out of Service	Mineral Oil	85	6600
CT	Avista Owned East Transformer - Out of Service	Mineral Oil	85	6600
PT	Avista Owned 63KV Potential Transformer - North	Mineral Oil	85	6600
PT	Avista Owned 63KV Potential Transformer - South	Mineral Oil	85	6600
S10	60KV Oil Circuit Breaker – North Phase	Mineral Oil	205	6600
S10	60KV Oil Circuit Breaker – Center Phase	Mineral Oil	205	6600
S10	60KV Oil Circuit Breaker – South Phase	Mineral Oil	205	6600
T3	# 5PM 13.8KV Buss Transformer	Mineral Oil	7270	8412
T4	# 5 Refiner 30000KVA, 110000/13800V	Mineral Oil	6838	7635
T5	# 5 Refiner 30000KVA, 110000/13800V	Mineral Oil	6838	7635
T11	Refiner East Buss Transformer	Mineral Oil	1972	6600
T12	Transformer Station Switch 120 XFMR	Mineral Oil	2068	6600
T13	Transformer Station Switch 130 XFMR	Mineral Oil	1833	6600
T15	Transformer Station 2400 XFMR	Mineral Oil	1950	6600
T121	Transformer Station 480V Switch Bank #1 XFMR	Mineral Oil	442	6600
T125	Transformer Station 480V Switch Bank #2 XFMR	Mineral Oil	496	6600
T210	Pulp Screens Transformer	Mineral Oil	306	374
T241	Effluent System Transformer	Mineral Oil	238	382
T321	# 5 Refiner 2500KVA, 13800/480V	Mineral Oil	433	1078
T322	# 5 Refiner 2500KVA, 13800/480V	Mineral Oil	433	912
T1300	# 2 PM Press & 1st Dryer Transformer	Mineral Oil	209	13402
T1301	MCC 40-42 Transformer	Mineral Oil	306	13402
T1310	Deink Plant Transformer	Mineral Oil	467	623
T3000	#5 PM Fans & Cleaners Pumps Transformer	Mineral Oil	657	21674
T3001	#5 PM Former Transformer	Mineral Oil	589	21674
T3002	#5 PM Press Transformer	Mineral Oil	657	21674
T3003	#5 PM Press Transformer	Mineral Oil	589	21674
T3010	#5 PM Dryers Transformer	Mineral Oil	657	21674
T3011	#5 PM Calenders Transformer	Mineral Oil	589	21674
T3012	#5 PM Reel and Winder Transformer	Mineral Oil	657	21674
T3020	MCC 50/52 & Calender Hot Oil System Transformer	Mineral Oil	492	21674
T3021	MCC 54,55,57,58 Transformer	Mineral Oil	492	21674
T3022	MCC 56,59,60,61 Transformer	Mineral Oil	492	21674
T3023	MCC 52,53,62 & Calender Hot Oil System Transformer	Mineral Oil	492	21674
T3030	#5 PM 4160V Motors Transformer	Mineral Oil	920	21674
T3031	#5 PM 4160V Tickler Refiners Motors Transformer	Mineral Oil	965	21674

Table 2C – List of Oil Filled Operational Equipment : Lubrication Systems

This table includes a complete list of all oil filled operational equipment located on-site. Facility maps with container locations may be found in Appendix B.

Map Symbol	**Oil Storage Container**	**Type of Oil**	**Shell Capacity** (gallons)	**Containment Capacity** (gallons)
A	#1 Primary Refiner Lube System	Lubrication Oil	100	19905
B	#1 Secondary Refiner Lube System	Lubrication Oil	100	19905
C	#2 Primary Refiner Lube System	Lubrication Oil	100	19905
D	#2 Secondary Refiner Lube System	Lubrication Oil	100	19905
E	Hi-Grade Primary Refiner Lube System	Lubrication Oil	100	19905
F	Hi-Grade Secondary Refiner Lube System	Lubrication Oil	100	19905
G	#3 Primary Refiner Lube System	Lubrication Oil	127	19905
H	#3 Secondary Refiner Lube System	Lubrication Oil	100	19905
J	#3 Tertiary Refiner Lube System	Lubrication Oil	100	19905
K	#4 Primary Refiner Lube System	Lubrication Oil	127	19905
L	#4 Secondary Refiner Lube System	Lubrication Oil	100	19905
M	#4 Tertiary Refiner Lube System	Lubrication Oil	100	19905
N	#5 PM Wet End Lube Oil Sump Tank	Lubrication Oil	75	537
P	#5 PM Wet End Lube Tank	Lubrication Oil	384	1294
Q	#5 PM Dry End Lube Tank	Lubrication Oil	874	1294
R	#5 PM Dry End Lube Oil Sump Tank	Lubrication Oil	75	325
S	#5 PM Calender Lube Oil Tank	Lubrication Oil	264	5981
T	#5 Primary Refiner Motor Lube Unit	Lubrication Oil	70	19905
U	#5 Secondary Refiner Motor Lube Unit	Lubrication Oil	70	19905

2. PAST AND POTENTIAL SPILLS

2.1 Past Spill Experience

On January 31, 2001, a small pool of oil was observed in a pipe tunnel beneath a 20,000-gallon fuel oil #6 storage tank located in a concrete vault at Inland Empire Paper Company (IEP). IEP promptly implemented activities to identify the source of the release and by February 2, 2001, a leak was identified on the east end of the tank. IEP estimated that about 500-600 gallons of product was released from the tank based on a product inventory review. The leaking tank was emptied and removed for disposal.

With the assistance of the Washington State Department of Ecology, remedial efforts were implemented during March of 2001. Six soil borings were drilled near the former tank and ground water monitoring wells were installed in three of the borings to assess the extent of contamination. Results of soil sampling indicated that oil range TPH exceeded MTCA Method "A" soil clean up levels for TPH at a depth of 15.6 feet below grade in one of the borings beneath the tank. Results from the monitoring wells around the tank site did not contain detectable concentrations of diesel or oil range petroleum hydrocarbons. These non-detect results were duplicated in subsequent quarterly tests. This tank was emptied and permanently closed in accordance with §112.2 in early 2017.

Periodic reviews (every 5 years) conducted by the WA State Dept. of Ecology have confirmed that the site meets the requirements of chapter 173-340 WAC, and the selected remedy continues to be protective of human health and the environment.

2.2 Potential Spills - Prediction and Control: §112.7(b)

The oil spill control strategy for the mill employs multiple levels of containment. The first level of control is an adequate inspection and maintenance program to repair or replace equipment that has potential to fail and spill oil. The next level of control is utilization of containments to the greatest extent practicable to contain oil spills around individual units. This strategy is aimed at keeping spilled oil from reaching drainage channels that flow to the mill effluent pump station at the north end of the plant. If spilled oil reaches the pump station, it will be pumped with mill wastewater to the mill water treatment primary clarifier on the northeast side of the mill. In the highly unlikely event that spilled oil flows beyond the primary clarifier, the mill will store contaminated water in the equalization tanks for as long as necessary until mitigation efforts are completed. If any contaminated water passes equalization, the secondary clarifier will contain the oil before release to the Spokane River.

2.2.1 Electrical Transformer Tank Puncture or Broken Tank Valve or Fitting

This section includes the following transformers:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
T3	# 5PM 13.8KV Buss Transformer	Mineral Oil	7270	8412
T4	# 5 Refiner 30000KVA, 110000/13800V	Mineral Oil	6838	7635
T5	# 5 Refiner 30000KVA, 110000/13800V	Mineral Oil	6838	7635
T11	Refiner East Buss Transformer	Mineral Oil	1972	6600
T12	Transformer Station Switch 120 XFMR	Mineral Oil	2068	6600
T13	Transformer Station Switch 130 XFMR	Mineral Oil	1833	6600
T15	Transformer Station 2400 XFMR	Mineral Oil	1950	6600
T121	Transformer Station 480V Switch Bank #1 XFMR	Mineral Oil	442	6600
T125	Transformer Station 480V Switch Bank #2 XFMR	Mineral Oil	496	6600
T241	Effluent System Transformer	Mineral Oil	238	382
T321	# 5 Refiner 2500KVA, 13800/480V	Mineral Oil	433	1078
T322	# 5 Refiner 2500KVA, 13800/480V	Mineral Oil	433	912
T1300	# 2 PM Press & 1st Dryer Transformer	Mineral Oil	209	13402
T1301	MCC 40-42 Transformer	Mineral Oil	306	13402
T1310	Deink Plant Transformer	Mineral Oil	467	623
T3000	#5 PM Fans & Cleaners Pumps Transformer	Mineral Oil	657	21674
T3001	#5 PM Former Transformer	Mineral Oil	589	21674
T3002	#5 PM Press Transformer	Mineral Oil	657	21674
T3003	#5 PM Press Transformer	Mineral Oil	589	21674
T3010	#5 PM Dryers Transformer	Mineral Oil	657	21674
T3011	#5 PM Calenders Transformer	Mineral Oil	589	21674
T3012	#5 PM Reel and Winder Transformer	Mineral Oil	657	21674
T3020	MCC 50/52 & Calender Hot Oil System Transformer	Mineral Oil	492	21674
T3021	MCC 54,55,57,58 Transformer	Mineral Oil	492	21674
T3022	MCC 56,59,60,61 Transformer	Mineral Oil	492	21674
T3023	MCC 52,53,62 & Calender Hot Oil System Transformer	Mineral Oil	492	21674
T3030	#5 PM 4160V Motors Transformer	Mineral Oil	920	21674
T3031	#5 PM 4160V Tickler Refiners Motors Transformer	Mineral Oil	965	21674

Possible Quantity: Approximately 209 to 7270 gallons depending on size.

Possible Rate: Unknown, depending on size of puncture or leak. Expected leak from largest transformer would likely be less than 100 gallons per minute. For other transformers over 1,000 gallon in capacity, largest leak would likely be less than 50 gallons per minute. For remaining units, largest leak would likely be less than 10 gallons per minute.

Direction of flow: Into secondary containment surrounding transformer.

In the unlikely event that a transformer tank is punctured or tank valve or fittings break, spilled product would be contained within the surrounding secondary containment. The spill response procedures listed in Section 4.4 would generally be followed as appropriate. The damaged transformer might be repaired in place after spill cleanup. If replaced, it would be thoroughly drained, vented, and sealed to prevent spillage during movement.

2.2.2 Electrical Transformer Tank Puncture or Broken Tank Valve or Fitting

This section includes the following transformer:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
T210	Pulp Screens Transformer	Mineral Oil	306	374

Possible Quantity: Approximately 306 gallons

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 10 gallons per minute.

Direction of flow: Into concrete catchment through pipe to secondary containment.

In the unlikely event that the transformer tank is punctured or tank valve or fitting breaks, spilled product would be channeled by a concrete catchment and connected piping into a steel secondary containment located in the building basement. The spill response procedures listed in Section 4.4 would generally be followed as appropriate. The damaged transformer might be repaired in place after spill cleanup. If replaced, it would be thoroughly drained, vented, and sealed to prevent spillage during movement.

2.2.3 Electrical Equipment Tank Puncture or Broken Tank Fitting

This section includes the following electrical equipment:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
CT	Avista Owned West Transformer - Out of Service	Mineral Oil	85	6600
CT	Avista Owned East Transformer - Out of Service	Mineral Oil	85	6600
PT	Avista Owned 63KV Potential Transformer - North	Mineral Oil	85	6600
PT	Avista Owned 63KV Potential Transformer - South	Mineral Oil	85	6600
S10	60KV Oil Circuit Breaker – North Phase	Mineral Oil	205	6600
S10	60KV Oil Circuit Breaker – Center Phase	Mineral Oil	205	6600
S10	60KV Oil Circuit Breaker – South Phase	Mineral Oil	205	6600

Possible Quantity: Approximately 85 to 205 gallons depending on size.

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 10 gallons per minute.

Direction of flow: Into secondary containment surrounding transformer

In the unlikely event that an electrical equipment tank is punctured or tank valve or fittings break, spilled product would be contained within the surrounding secondary containment. The spill response procedures listed in Section 4.4 would generally be followed as appropriate. The damaged equipment might be repaired in place after spill cleanup. If replaced, it would be thoroughly drained, vented, and sealed to prevent spillage during movement.

2.2.4 Hydraulic Tank Puncture or Broken Tank Valve or Fitting

This section includes the following hydraulic systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
1	Removed from Mill	NA	NA	NA
2	Old Newspaper Truck Dumper Hydraulic Unit	Hydraulic Oil	848	1174
3	Old Newspaper Hopper Live Floor Hydraulic Unit	Hydraulic Oil	67	1174
4	#5 PM Wet End Auxiliary Hydraulic Unit	Hydraulic Oil	339	441
5	# 5PM Press Auxiliary Hydraulic Unit	Hydraulic Oil	339	400
6	#5 PM 1st Press (Kuesters) Hydraulic Unit	Hydraulic Oil	845	962
7	#5 PM 3re Press (NIPCOFLEX) Hydraulic Unit	Hydraulic Oil	3442	3466
8	#5 PM Cal Hot Oil/ Hydraulic Unit	Hydraulic Oil	2114	5981
9	#5 PM Cal #1 Oil Heating Unit	Hydraulic Oil	190	1227
10	#5 PM CAL #2 Oil Heating Unit	Hydraulic Oil	190	1227
11	#5 PM Cal Hot Oil Tank	Hydraulic Oil	622	1227
14	Roll Wrap Hydraulic Unit	Hydraulic Oil	486	542
15	Lowering Upender Hydraulic Unit	Hydraulic Oil	322	367
16	Chip Truck/Railcar Dumper Hydraulic Unit	Hydraulic Oil	2000	2187
17	Chip Truck/Railcar Dumper Hydraulic Cylinders	Hydraulic Oil	224	1550
18	Railcar Unloading Conveyor Hydraulic Unit	Hydraulic Oil	300	317

Possible Quantity: Approximately 67 to 3442 gallons depending on tank size.

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 10 gallons per minute for units less than 1,000 gallons capacity. For the units over 1,000 gallons in capacity, the largest expected leak could be in the range of 200 gallons per minute.

Direction of flow: Into secondary containment surrounding the tank.

In the unlikely event that a hydraulic unit tank is punctured or tank valves or fittings break, spilled product would be contained within the surrounding secondary containment. The spill response procedures listed in Section 4.4 would generally be followed as appropriate.

2.2.5 Hydraulic Tank Puncture or Broken Tank Valve or Fitting

This section includes the following hydraulic systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
12	#5 PM Reel Hydraulic Unit	Hydraulic Oil	221	239
13	#5 PM Winder Hydraulic Unit	Hydraulic Oil	329	337

Possible Quantity: Approximately 221 to 329 gallons depending on tank size.

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 10 gallons per minute.

Direction of flow: Into concrete catchment through pipe to secondary containment.

In the unlikely event that a hydraulic unit tank is punctured or tank valves or fittings break, spilled product would be channeled by steel catchments through piping to a secondary containment in the building basement. The spill response procedures listed in Section 4.4 would generally be followed as appropriate.

2.2.6 Lubrication System Tank Puncture or Broken Tank Valve or Fitting

This section includes the following lubrication systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
P	#5 PM Wet End Lube Tank	Lubrication Oil	384	1294
Q	#5 PM Dry End Lube Tank	Lubrication Oil	874	1294
R	#5 PM Dry End Lube Oil Sump Tank	Lubrication Oil	75	325
S	#5 PM Calender Lube Oil Tank	Lubrication Oil	264	5981

Possible Quantity: Approximately 75 to 874 gallons depending on tank size.

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 10 gallons per minute for most units. For the largest unit, 874 gallons in capacity, the largest expected leak rate could be as much as 20 to 30 gallons per minute.

Direction of flow: Into secondary containment surrounding the tank.

In the unlikely event that a lubrication system tank is punctured or tank valves, or fittings, break, spilled product would be contained within the surrounding secondary containment. The spill response procedures listed in Section 4.4 would generally be followed as appropriate.

2.2.7 Lubrication/Hydraulic System Tank Puncture or Broken Tank Valve or Fitting

This section includes the following lubrication and hydraulic systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
G	#3 Primary Refiner Lube System	Lubrication Oil	127	19905
K	#4 Primary Refiner Lube System	Lubrication Oil	127	19905
T	#5 Primary Refiner Motor Lube Unit	Lubrication Oil	70	19905
U	#5 Secondary Refiner Motor Lube Unit	Lubrication Oil	70	19905
19	#5 Primary Refiner Hydraulic Unit	Hydraulic Oil	168	19905
20	#5 Secondary Refiner Hydraulic Unit	Hydraulic Oil	168	19905

Possible Quantity: Approximately 70 to 168 gallons depending on tank size.

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 10 gallons per minute.

Direction of flow: Onto floor surrounding tank.

In the unlikely event that a lubrication system tank is punctured or tank valves or fittings, break, spilled product would be observed by the equipment operator who is present at all times. Associated tanks are equipped with low-level alarms that would alert operators of a leak. In addition, the refining equipment would shutdown for a low-low level condition. Once the operator became aware of the spill, he would contain the spill using pigs, booms and absorbent material from the nearby spill kit shown on the plant map. The spill response procedures listed in Section 4.4 would generally be followed as appropriate.

In the unlikely event that a portion of the spill migrated into a floor drain, it would travel through channels, sumps and piping to the mill effluent pumping station and be pumped to the primary clarifier. The spill response procedures listed in Section 4.4 will be followed as appropriate to clean the oil off the clarifier.

2.2.8 Lubrication System Tank Puncture or Broken Tank Valve or Fitting

This section includes the following lubrication systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
A	#1 Primary Refiner Lube System	Lubrication Oil	100	19905
B	#1 Secondary Refiner Lube System	Lubrication Oil	100	19905
C	#2 Primary Refiner Lube System	Lubrication Oil	100	19905
D	#2 Secondary Refiner Lube System	Lubrication Oil	100	19905
E	Hi-Grade Primary Refiner Lube System	Lubrication Oil	100	19905
F	Hi-Grade Secondary Refiner Lube System	Lubrication Oil	100	19905
H	#3 Secondary Refiner Lube System	Lubrication Oil	100	19905
J	#3 Tertiary Refiner Lube System	Lubrication Oil	100	19905
L	#4 Secondary Refiner Lube System	Lubrication Oil	100	19905
M	#4 Tertiary Refiner Lube System	Lubrication Oil	100	19905

Possible Quantity: Approximately 100 gallons.

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 10 gallons per minute.

Direction of flow: Onto floor and into floor drains and process tanks surrounding tank.

In the unlikely event that a lubrication system tank is punctured or tank valves, fittings, or piping breaks, spilled product would be observed by the equipment operator who is present at all times. Tanks are equipped with low-level alarms that would alert operators of a leak. In addition, the associated refining equipment would shut down for a low-low level condition. Once the operator became aware of the spill, he would contain the spill using pigs, booms and absorbent material from the nearby spill kit shown on the plant map. The spill response procedures listed in Section 4.4 will generally be followed as appropriate.

In the unlikely event that a portion of the spill migrated into a floor drain, it would travel through channels, sumps and piping to the mill effluent pumping station and be pumped to the primary clarifier. The spill response procedures listed in Section 4.4 will be followed as appropriate to clean the oil off the clarifier.

2.2.9 Overfilling During Loading of Fuel Tanks from Tanker Truck

This section includes the following tanks:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 1	Fire Protection Pump Diesel Tank	Diesel	217	238
BSA - 4	Effluent Pump Diesel Tank	Diesel	212	316
BSA - 5	100' Primary Clarifier Pump Diesel Tank	Diesel	212	316
BSA - 18	Mobile Equipment Diesel Tank	Diesel	500	817
BSA - 25	Mobile Equipment Gasoline Tank	Gasoline	300	753

Possible Quantity: Approximately 50 gallons

Possible Rate: Approximately 100 gpm

Direction of flow: Into container or secondary containment surrounding container.

Fuel is transferred from tanker truck to the bulk storage tanks using a hose equipped with an automatic shut-off nozzle. Fuel addition is monitored by an attendant operating the nozzle. In the unlikely event of overfilling, the attendant would immediately stop pumping. Any spilled product would be contained and cleaned up using hand pumps and sorbent materials stored on site according to the spill response procedures outlined in Section 4.4 as appropriate.

2.2.10 Fuel Tank Puncture or Broken Tank Valve, or Fitting

This section includes tanks listed in the section 2.2.9 above.

Possible Quantity: Approximately 212 to 500 gallons depending on tank size.

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 10 gallons per minute.

Direction of flow: Into secondary containment surrounding the tank.

In the unlikely event that a fuel tank is punctured or tank valves or fittings break, spilled product would be contained within the surrounding secondary containment. The spill response procedures listed in Section 4.4 will generally be followed as appropriate.

2.2.11 Overfilling During Loading of Boiler Fuel Oil Tank from Tanker Truck

This section includes the following tank:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 3	Permanently Closed per §112.2	NA	18514	26232

Possible Quantity: NA

Possible Rate: NA

Direction of flow: Into secondary containment surrounding tank or across concrete slab into nearby truck unloading rack containment area.

The boiler fuel oil tank has been permanently closed per §112.2 All piping into and out of the tank has been abandoned and/or removed and capped, any valving has been locked into a closed position.

2.2.12 Boiler Fuel Oil Tank Puncture or Broken Tank Valve or Fitting

This section includes the tank listed in the previous section 2.2.11.

Possible Quantity: NA

Possible Rate: NA

Direction of flow: Into secondary containment surrounding the tank.

The boiler fuel oil tank has been permanently closed per §112.2 All piping into and out of the tank has been abandoned and/or removed and capped, any valving has been locked into a closed position.

2.2.13 55-Gallon Drum Puncture or leak

This section includes 55-gallon drums stored in the following locations:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 6	Removed from Mill Site	NA	NA	NA
BSA - 7	Bulk Storage Area - North of #4 Refiner	Misc. Oil in Drums	55	145
BSA - 8	Bulk Storage Area - #2 PM Building SW Corner	Misc. Oil in Drums	55	166
BSA - 9	Bulk Storage Area - Behind #5 PM DE Control Room	Misc. Oil in Drums	55	82
BSA - 10	Bulk Storage Area - #5 PM Building, Baylines E-F/10-11	Misc. Oil in Drums	1002	1227
BSA - 11	Bulk Storage Area - #5 PM Building, Baylines D/11	Misc. Oil in Drums	55	102
BSA - 12	Bulk Storage Area - #5 PM Building, Baylines B-C/11	Misc. Oil in Drums	55	57
BSA - 13	Bulk Storage Area - #5 PM Building, Baylines A/8-9	Misc. Oil in Drums	55	104
BSA - 14	Bulk Storage Area - Maintenance Shop	Misc. Oil in Drums	55	66
BSA - 15	Bulk Storage Area - #5 PM Building NE Corner	Misc. Oil in Drums	55	86
BSA - 16	Bulk Storage Area - #5 PM Building, Baylines F/4-6	Misc. Oil in Drums	55	77
BSA - 17	Bulk Storage Area - #2 PM Building NW Corner	Misc. Oil in Drums	55	63
BSA - 19	Bulk Storage Area - South of #5 Refiner	Misc. Oil in Drums	55	249
BSA - 20	Bulk Storage Area East of #5 Refiner	Misc. Oil in Drums	55	164

Possible Quantity: Approximately 55 gallons

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 10 gallons per minute.

Direction of flow: Into secondary containment surrounding the drums.

In the unlikely event that a 55-gallon drum is punctured or leaks, spilled product would be contained within the surrounding secondary containment. The spill response procedures listed in Section 4.4 will generally be followed as appropriate.

2.2.14 Defoamer Tank puncture or broken tank valve or fitting

This section includes three 3,600 gallon tanks tied together by piping at the bottom of each tank to act as one for the total volume listed in the table below, in addition to smaller bulk storage tanks located in the Refiner basement and the Dry Chemical Warehouse.

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 21	Bulk Storage Area NW Corner # 2PM Basement	Defoamer	10800	10815
BSA - 26	Bulk Storage Area – Refiner Basement	Defoamer	500	550
BSA - 27	Bulk Storage Area – Dry Chemical Warehouse	Defoamer	350	390

Possible Quantity: Approximately 350 to 10,800 gallons depending on tank size.

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 200 gallons per minute.

Direction of flow: Into secondary containment surrounding the tanks.

In the unlikely event that a Defoamer tank is punctured or tank valves or fittings break, spilled product would be contained within the surrounding secondary containment. The spill response procedures listed in Section 4.4 would generally be followed as appropriate.

2.2.15 Polymer tote puncture or broken tote valve or fitting

This section includes storage of 275 gallon totes in the areas indicated in the table below.

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 22	Bulk Storage Area #2 PM Building North End	Polymer	275	516

Possible Quantity: Approximately 275 gallons.

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 10 gallons per minute.

Direction of flow: Into secondary containment surrounding the totes.

In the unlikely event that a Polymer tote is punctured or tote valves or fittings break, spilled product would be contained within the surrounding secondary containment. The spill response procedures listed in Section 4.4 would generally be followed as appropriate.

2.2.16 Polymer or Defoamer Tote Puncture or Broken Tote Valve or Fitting

This section includes storage of 275 gallon totes in the areas indicated in the table below.

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 23	Bulk Storage Area #2 PM Building	Defoamer/Polymer	275	19905
BSA - 24	Bulk Storage Area #5 PM, Baylines A-B/6	Defoamer	275	19905

Possible Quantity: Approximately 275 gallons.

Possible Rate: Unknown, depending on size of puncture or leak, but likely less than 10 gallons per minute.

Direction of flow: Onto floor containment surrounding totes.

In the unlikely event that a Polymer or Defoamer tote is punctured or tote valves or fittings, break, spilled product would be observed by the equipment operator who is present at all times. Once the operator became aware of the spill, he would contain the spill using pigs, booms and absorbent material from the nearby spill kit shown on the plant map. The spill response procedures listed in Section 4.4 would generally be followed as appropriate.

In the unlikely event that a portion of the spill migrated into a floor drain, it would travel through channels, sumps and piping a containment station in the #2PM basement and to be loaded into an appropriate container. In the unlikely situation that product enters the mill sewer system the spill response procedures listed in Section 4.4 will be followed as appropriate to clean the oil off the clarifier.

2.2.17 Overfilling Defoamer Tank from Tanker Truck

This section includes the tanks as listed in section 2.2.14 above.

Possible Quantity: Approximately 50 gallons

Possible Rate: Approximately 100 gpm

Direction of flow: Into secondary containment surrounding tank or across concrete slab into nearby truck unloading rack containment area.

This tank is filled from a tanker truck parked on a concrete slab adjacent to the tank. A fill pipe is routed from the truck unloading area to the top of the tank. Defoamer is transferred from tanker truck to the fill pipe through a hose monitored by an attendant. In the unlikely event of overfilling, the attendant would immediately stop pumping. The quantity of Defoamer overfilled would flow out of the fill pipe onto the tank and into the secondary containment. Any spilled product resulting from leaks in the hose assembly would flow across the concrete slab to a catchment. From there it will flow through channels, sumps and piping to the mill effluent pumping station and be pumped to the primary clarifier. Absorbent materials and booms stored near this tank will be used for cleanup and channeling of flow according to the spill response procedures outlined in Section 4.4 as appropriate.

3. DESIGN AND OPERATING INFORMATION

3.1 Bulk Storage Containers: §112.7(i) & §112.8(c)(1, 2, 4, 5, 7, 8-11)

The following bulk storage containers are present at the mill site:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 1	Fire Protection Pump Diesel Tank	Diesel	217	238
BSA - 3	Permanently Closed per §112.2	NA	18514	26232
BSA - 4	Effluent Pump Diesel Tank	Diesel	212	316
BSA - 5	100' Primary Clarifier Pump Diesel Tank	Diesel	212	316
BSA - 18	Mobile Equipment Diesel Tank	Diesel	500	817
BSA - 19	Bulk Storage Area – South of #5 Refiner	Misc. Oil in Drums	55	249
BSA - 20	Bulk Storage Area – East of #5 Refiner	Misc. Oil in Drums	55	164
BSA - 21	Bulk Storage Area – NW Corner # 2PM Basement	Defoamer	10800	10815
BSA - 22	Bulk Storage Area – #2 PM Building North End	Polymer	275	516
BSA - 23	Bulk Storage Area – #2 PM Building	Defoamer/Polymer	275	19905
BSA - 24	Bulk Storage Area – #5 PM, Baylines A-B/6	Defoamer	275	19905
BSA - 25	Mobile Equipment Gasoline Tank	Gasoline	300	753
BSA - 26	Bulk Storage Area – Refiner Basement	Defoamer	500	550
BSA - 27	Bulk Storage Area – Dry Chemical Warehouse	Defoamer	350	390

In addition, 55-gallon drums of oil are stored in the following locations:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 6	Removed from Mill Site	NA	NA	NA
BSA - 7	Bulk Storage Area - North of #4 Refiner	Misc. Oil in Drums	55	145
BSA - 8	Bulk Storage Area - #2 PM Building SW Corner	Misc. Oil in Drums	55	166
BSA - 9	Bulk Storage Area - Behind #5 PM DE Control Room	Misc. Oil in Drums	55	82
BSA - 10	Bulk Storage Area - #5 PM Building, Baylines E-F/10-11	Misc. Oil in Drums	1002	1227
BSA - 11	Bulk Storage Area - #5 PM Building, Baylines D/11	Misc. Oil in Drums	55	102
BSA - 12	Bulk Storage Area - #5 PM Building, Baylines B-C/11	Misc. Oil in Drums	55	57
BSA - 13	Bulk Storage Area - #5 PM Building, Baylines A/8-9	Misc. Oil in Drums	55	104
BSA - 14	Bulk Storage Area - Maintenance Shop	Misc. Oil in Drums	55	66
BSA - 15	Bulk Storage Area - #5 PM Building NE Corner	Misc. Oil in Drums	55	86
BSA - 16	Bulk Storage Area - #5 PM Building, Baylines F/4-6	Misc. Oil in Drums	55	77
BSA - 17	Bulk Storage Area - #2 PM Building NW Corner	Misc. Oil in Drums	55	63
BSA - 19	Bulk Storage Area - South of #5 Refiner	Misc. Oil in Drums	55	249
BSA - 20	Bulk Storage Area East of #5 Refiner	Misc. Oil in Drums	55	164

By definition in 40 CFR 112.2, oil-filled operational equipment including electrical, hydraulic and lubrication equipment are not considered bulk storage containers.

All bulk storage tanks listed in this section (other than Defoamer or Polymer tanks) are of steel construction suitable for contact with oil. Bulk storage tanks for Defoamer and Polymer are constructed of heavy gauge plastic suitable for contact with fluids contained.

All bulk storage tanks and drums listed in this section (other than BSA-23 and BSA-24 discussed in section 3.5) are surrounded by secondary containments designed to hold the contents of their respective tanks. Containments are indoors with the exception of the Mobile Equipment Gasoline and Diesel Tanks (BSA-18, 25). Detailed in Section 3.4 the containment design capacity for all outdoor tanks accounts for precipitation volume in addition to the Mobile Equipment Tank volume.

None of the above tanks are buried or partially buried.

Visual inspections are performed routinely on all steel tanks listed in this section by IEP's maintenance personnel. 55-gallon drums are visually inspected for damage upon receipt.

In the unlikely event that a spill occurs and flows outside of a secondary containment, the spill would be contained by the mill effluent system. The primary clarifiers are the first place the oil would be contained and noticed. Both primary clarifiers are inspected during each work shift as detailed in Section 4.1. Both clarifiers are effective oil-water separators as detailed in 3.4.10. In the extremely unlikely event that the spill migrated past the primary clarifiers, it would then be contained and noticed at the secondary clarifier that is also inspected during each work shift. The secondary clarifier is also an effective oil-water separator as detailed in 3.4.11.

There are no portable or mobile oil storage tanks on the mill site.

3.2 Facility Tanker Truck Unloading Rack: §112.7(h)(1-3)

The Mill Oil Truck Unloading Rack is a concrete catchment basin that drains through piping to a secondary containment with a capacity of: 8671 Gallons. This containment is located in the basement of a nearby building as shown on the plant map and detailed in 3.4.7.

No tank cars or tank trucks are filled with oil products at this Unloading Rack or anywhere in the mill.

3.3 Piping: §112.8(d)(1-5)

There is no buried oil piping at the facility. If any buried oil piping is installed, it will be protected as stated in §112.8(d)(1).

All of the mill hydraulic tanks, lubrication tanks, defoamer tanks, polymer totes and most of the diesel oil tanks have piping to mill processes. All piping is inspected routinely by IEP maintenance personnel as outlined in 4.1. In addition the mill has dedicated millwrights dedicated to keeping all systems free of leaks and in good working order.

3.4 Containment Systems: §112.7(a)(3)(iii), §112.7(c)(1), & §112.7(d)

3.4.1 Indoor Concrete Secondary Containments

This section includes the following systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 1	Fire Protection Pump Diesel Tank	Diesel	217	238
BSA - 7	Bulk Storage Area - North of #4 Refiner	Misc. Oil in Drums	55	145
BSA - 8	Bulk Storage Area - #2 PM Building SW Corner	Misc. Oil in Drums	55	166
BSA - 9	Bulk Storage Area - Behind #5 PM DE Control Room	Misc. Oil in Drums	55	82
BSA - 10	Bulk Storage Area - #5 PM Building Baylines E-F/10-11	Misc. Oil in Drums	1002	1227
BSA - 11	Bulk Storage Area - #5 PM Building Baylines D/11	Misc. Oil in Drums	55	102
BSA - 12	Bulk Storage Area - #5 PM Building Baylines B-C/11	Misc. Oil in Drums	55	57
BSA - 13	Bulk Storage Area - #5 PM Building Baylines A/8-9	Misc. Oil in Drums	55	104
BSA - 15	Bulk Storage Area - #5 PM Building NE Corner	Misc. Oil in Drums	55	86
BSA - 16	Bulk Storage Area - #5 PM Building Baylines F/4-6	Misc. Oil in Drums	55	77
BSA - 17	Bulk Storage Area - #2 PM Building NW Corner	Misc. Oil in Drums	55	63
BSA - 19	Bulk Storage Area - South of #5 Refiner	Misc. Oil in Drums	55	249
BSA - 20	Bulk Storage Area East of #5 Refiner	Misc. Oil in Drums	55	164
BSA - 21	Bulk Storage Area NW Corner # 2PM Basement	Defoamer	10800	10815
BSA - 22	Bulk Storage Area #2 PM Building North End	Polymer	275	516
BSA - 23	Bulk Storage Area #2 PM Building	Defoamer/Polymer	275	19905
2	Old Newspaper Truck Dumper Hydraulic Unit	Hydraulic Oil	848	1174
3	Old Newspaper Hopper Live Floor Hydraulic Unit	Hydraulic Oil	67	1174
4	#5 PM Wet End Auxiliary Hydraulic Unit	Hydraulic Oil	339	441
5	# 5PM Press Auxiliary Hydraulic Unit	Hydraulic Oil	339	400
6	#5 PM 1st Press (Kuesters) Hydraulic Unit	Hydraulic Oil	845	962
7	#5 PM 3re Press (NIPCOFLEX) Hydraulic Unit	Hydraulic Oil	3442	3466
8	#5 PM Cal Hot Oil/ Hydraulic Unit	Hydraulic Oil	2114	5981
9	#5 PM Cal #1 Oil Heating Unit	Hydraulic Oil	190	1227
10	#5 PM CAL #2 Oil Heating Unit	Hydraulic Oil	190	1227
11	#5 PM Cal Hot Oil Tank	Hydraulic Oil	622	1227
14	Roll Wrap Hydraulic Unit	Hydraulic Oil	486	542
15	Lowering Upender Hydraulic Unit	Hydraulic Oil	322	367
16	Chip Truck/Railcar Dumper Hydraulic Unit	Hydraulic Oil	2000	2187
18	Railcar Unloading Conveyor Hydraulic Unit	Hydraulic Oil	300	317
CT	Avista Owned West Transformer - Out of Service	Mineral Oil	85	6600
CT	Avista Owned East Transformer - Out of Service	Mineral Oil	85	6600
PT	Avista Owned 63KV Potential Transformer - North	Mineral Oil	85	6600
PT	Avista Owned 63KV Potential Transformer - South	Mineral Oil	85	6600
S10	60KV Oil Circuit Breaker – North Phase	Mineral Oil	205	6600
S10	60KV Oil Circuit Breaker – Center Phase	Mineral Oil	205	6600
S10	60KV Oil Circuit Breaker – South Phase	Mineral Oil	205	6600
T11	Refiner East Buss Transformer	Mineral Oil	1972	6600
T12	Transformer Station Switch 120 XFMR	Mineral Oil	2068	6600
T13	Transformer Station Switch 130 XFMR	Mineral Oil	1833	6600
T15	Transformer Station 2400 XFMR	Mineral Oil	1950	6600
T121	Transformer Station 480V Switch Bank #1 XFMR	Mineral Oil	442	6600
N	#5 PM Wet End Lube Oil Sump Tank	Lubrication Oil	75	537
P	#5 PM Wet End Lube Tank	Lubrication Oil	384	1294
Q	#5 PM Dry End Lube Tank	Lubrication Oil	874	1294
R	#5 PM Dry End Lube Oil Sump Tank	Lubrication Oil	75	325

S	#5 PM Calender Lube Oil Tank	Lubrication Oil	264	5981

Since the above systems are indoors, no allowance is included in containment size for rainwater.

3.4.2 Indoor Steel Catchments

This section includes the following systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
12	#5 PM Reel Hydraulic Unit	Hydraulic Oil	221	239
13	#5 PM Winder Hydraulic Unit	Hydraulic Oil	329	337

The above systems are surrounded by catchments that drain through piping to secondary containments located in building basements. Since the above systems are indoors, no allowance is included in containment size for rainwater.

3.4.3 Indoor Steel Secondary Containments

This section includes the following systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 4	Effluent Pump Diesel Tank	Diesel	212	316
BSA - 5	100' Primary Clarifier Pump Diesel Tank	Diesel	212	316

The above tanks are mounted above cylindrical steel secondary containment. Since the above systems are indoors, no allowance is included in containment size for rainwater.

3.4.4 Outdoor Concrete Secondary Containments with Sump Pumps

This section includes the following systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
T1300	# 2 PM Press & 1st Dryer Transformer	Mineral Oil	209	13402
T1301	MCC 40-42 Transformer	Mineral Oil	306	13402
T1310	Deink Plant Transformer	Mineral Oil	467	623

The above systems are outdoors. The containments will contain the contents of the largest container plus an amount of precipitation equal to the 30-year, 24-hour extreme precipitation event, or 1.8" of rainfall. Each containment has a manually operated sump pump for rainwater removal. The pump will not start automatically. Instructions for rainwater removal and correct use of the pump are posted at the containment and included in Appendix C.

3.4.5 Outdoor Concrete Secondary Containments with Hand Operated Drain Valves

This section includes the following systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
17	Chip Truck/Railcar Dumper Hydraulic Cylinders	Hydraulic Oil	224	1550
T4	# 5 Refiner 30000KVA, 110000/13800V	Mineral Oil	6838	7635
T5	# 5 Refiner 30000KVA, 110000/13800V	Mineral Oil	6838	7635
T241	Effluent System Transformer	Mineral Oil	238	382
T321	# 5 Refiner 2500KVA, 13800/480V	Mineral Oil	433	1078
T322	# 5 Refiner 2500KVA, 13800/480V	Mineral Oil	433	912

The above systems are outdoors. The containment will contain the contents of the largest container plus an amount of precipitation equal to the 30-year, 24-hour extreme precipitation event or 1.8" of rainfall. The containment has a manually operated hand valve for rainwater removal. Instructions for rainwater removal and correct use of the hand valve are posted at the containment and included in Appendix C.

3.4.6 Outdoor Concrete Secondary Catchments

This section includes the following systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
T210	Pulp Screens Transformer	Mineral Oil	306	374

The above system is outdoors. The catchment will channel a spill to a drain. The drain is connected by piping to a steel secondary containment with the capacity shown. The containment tank will contain the contents of the largest container plus an amount of precipitation equal to the 30-year, 24-hour extreme precipitation event or 1.8" of rainfall. It is equipped with a manually operated hand valve for rainwater removal. Instructions for rainwater removal and correct use of the hand valve are posted at the containment and included in Appendix C.

3.4.7 Outdoor Concrete Secondary Catchments

This section includes the following systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 2	Truck Unloading Rack	Diesel	3000	8671

The above system is outdoors in a single catchment that will channel a spill to a drain that is connected by piping to a concrete secondary containment with the capacity shown. The largest tanker truck to deliver at the mill is 3000 gallons.

3.4.8 Outdoor Concrete Secondary Containment with Passive Oil Detection System

This section includes the following systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
T3	# 5PM 13.8KV Buss Transformer	Mineral Oil	7270	8412

The above systems are outdoors. The containment will contain the contents of the largest container plus an amount of precipitation equal to the 30-year, 24-hour extreme precipitation event or 1.8"of rainfall. The containment is equipped with polymer bead filled drain basket that readily allows water to pass but will seal off any oil spills. In the unlikely event of an oil spill, the polymer beads immediately absorb oil, swell to fill the diameter of the pipe, and stop the flow of oil through the drain.

3.4.9 Outdoor Concrete Secondary Containment with Remote Passive Oil Detection System

This section includes the following systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
T3000	#5 PM Fans & Cleaners Pumps Transformer	Mineral Oil	657	21674
T3001	#5 PM Former Transformer	Mineral Oil	589	21674
T3002	#5 PM Press Transformer	Mineral Oil	657	21674
T3003	#5 PM Press Transformer	Mineral Oil	589	21674
T3010	#5 PM Dryers Transformer	Mineral Oil	657	21674
T3011	#5 PM Calenders Transformer	Mineral Oil	589	21674
T3012	#5 PM Reel and Winder Transformer	Mineral Oil	657	21674
T3020	MCC 50/52 & Calender Hot Oil System Transformer	Mineral Oil	492	21674
T3021	MCC 54,55,57,58 Transformer	Mineral Oil	492	21674
T3022	MCC 56,59,60,61 Transformer	Mineral Oil	492	21674
T3023	MCC 52,53,62 & Calender Hot Oil System Transformer	Mineral Oil	492	21674
T3030	#5 PM 4160V Motors Transformer	Mineral Oil	920	21674
T3031	#5 PM 4160V Tickler Refiners Motors Transformer	Mineral Oil	965	21674

The above systems are outdoors in a single containment that will contain the contents of the largest container plus an amount of precipitation equal to the 30-year, 24-hour extreme precipitation event or 1.8”of rainfall. The containment is equipped with an open drain connected by piping to a remote sump. The sump contains a polymer bead filled drain basket that readily allows water to pass but will seal off any oil spills. In the unlikely event of an oil spill, the polymer beads immediately absorb oil, swell to fill the diameter of the pipe, and stop the flow of oil through the drain basket. The sump level will then rise and cause a float valve to stop flow through the containment drainpipe.

3.4.10 Outdoor Secondary Containment with Awnings to Mitigate Precipitation Affects

This section includes the following systems:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 18	Mobile Equipment Diesel Tank	Diesel	500	817
BSA - 25	Mobile Equipment Gasoline Tank	Gasoline	300	753

The above systems are outdoors with an overhead awning to mitigate precipitation affects. However, the containment will contain the contents of the largest container plus an amount of precipitation equal to the 30-year, 24-hour extreme precipitation event or 1.8” of rainfall.

3.4.11 Mill Effluent System Primary Clarifiers

This section includes the following clarifiers:

Map Symbol	Oil Storage Container	Largest Single Volume Contained	Total Capacity (gallons)
I	100’ Primary Clarifier	NA	705000

The above clarifier is an effective retention pond that provide “appropriate containment” as allowed by §112.7(c). Water from the effluent pumping station is pumped into the primary clarifiers and allowed to settle giving oil time to separate from the water phase. The primary clarifier is equipped with a baffle ring that encircles the perimeter and traps oil floating on the surface.

3.4.12 Mill Effluent System Equalization Tanks

This section includes the following storage tanks:

Map Symbol	Oil Storage Container	Largest Single Volume Contained	Total Capacity (gallons)
II (E)	East Equalization Tank	NA	1,100,000
II (W)	West Equalization Tank	NA	1,100,000

The above equalization tanks are effective retention vessels that provide “appropriate containment” as allowed by §112.7(c). In the unlikely event that oil migrates past the primary clarifier, flow is automatically directed to two identical one-million capacity tanks. These tanks are used during routine wastewater treatment operations for flow and organic load normalization. In the event of a spill, operators can intentionally divert all contaminated water to a single tank and isolate from the rest of the process.

3.4.13 Mill Effluent System Intermediate Clarifier

This section includes the following clarifier:

Map Symbol	Oil Storage Container	Largest Single Volume Contained	Total Capacity (gallons)
III	75’ MBBR Clarifier	NA	463000

The above clarifier is an effective retention ponds that provide “appropriate containment” as allowed by §112.7(c). In the unlikely event that oil migrates past both the primary clarifier and the equalization tanks it can be captured by the intermediate clarifier. This clarifier captures settleable biosolids generated by the first phase of biological wastewater treatment, the moving bed biofilm reactors (MBBRs). Similar to the primary clarifier, the MBBR clarifier is equipped with a baffle ring that encircles the perimeter and traps oil floating on the surface.

3.4.14 Mill Effluent System Secondary Clarifier

This section includes the following clarifiers:

Map Symbol	Oil Storage Container	Largest Single Volume Contained	Total Capacity (gallons)
IV	120’ Secondary Clarifier	NA	1040000

The above clarifier is an effective retention pond that provides “appropriate containment” as allowed by §112.7(c). In the unlikely event that oil migrated through the primary clarifier, the equalization tanks, and the intermediate clarifier, it would flow through the second phase of biological wastewater treatment, activated sludge, and separate at this clarifier. Oil would be trapped within a baffle ring that encircles the perimeter of the water surface.

3.4.15 Indoor Portable Secondary Containment

This section includes the following Bulk Storage Areas:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
BSA - 6	Removed from Mill Site	NA	NA	NA
BSA - 14	Bulk Storage Area - Maintenance Shop	Misc. Oil in Drums	55	66

The above Bulk Storage Areas include waste oil drums that are stored on commercially available portable "Spill Skids." Since the above systems are indoors, no allowance is included in containment size for rainwater.

3.5 Facility Drainage: §112.8(b)(1-5) & §112.8(c)(3)

Refer to the plant map for details of drainage system. Drainage from each tank and containment system is shown. Most outdoor and some indoor secondary containments have valves or sump pumps for draining. All such devices are manual on-and-off or manual open-and-close. These devices adequately protect against discharge into the drainage and effluent treatment systems. None of the secondary containments drain directly into the Spokane River or any other open watercourse.

As noted in Section 2.2, the following systems are not equipped with dikes and have a potential for discharge:

Map Symbol	Oil Storage Container	Type of Oil	Shell Capacity (gallons)	Containment Capacity (gallons)
A	#1 Primary Refiner Lube System	Lubrication Oil	100	19905
B	#1 Secondary Refiner Lube System	Lubrication Oil	100	19905
C	#2 Primary Refiner Lube System	Lubrication Oil	100	19905
D	#2 Secondary Refiner Lube System	Lubrication Oil	100	19905
E	Hi-Grade Primary Refiner Lube System	Lubrication Oil	100	19905
F	Hi-Grade Secondary Refiner Lube System	Lubrication Oil	100	19905
G	#3 Primary Refiner Lube System	Lubrication Oil	127	19905
H	#3 Secondary Refiner Lube System	Lubrication Oil	100	19905
J	#3 Tertiary Refiner Lube System	Lubrication Oil	100	19905
K	#4 Primary Refiner Lube System	Lubrication Oil	127	19905
L	#4 Secondary Refiner Lube System	Lubrication Oil	100	19905
M	#4 Tertiary Refiner Lube System	Lubrication Oil	100	19905
T	#5 Primary Refiner Motor Lube Unit	Lubrication Oil	70	19905
U	#5 Secondary Refiner Motor Lube Unit	Lubrication Oil	70	19905
19	#5 Primary Refiner Hydraulic Unit	Hydraulic Oil	168	19905
20	#5 Secondary Refiner Hydraulic Unit	Hydraulic Oil	168	19905
BSA - 24	Bulk Storage Area #5 PM, Baylines A-B/6	Defoamer	275	19905

The mill drainage system is designed to channel discharge from these systems to the effluent system as allowed by §112.8(b)(3). See Section 3.4 above for a description of the mill effluent system containment capabilities.

The mill contains no other oil systems without secondary containment.

All oil systems in the plant are above the 100-year flood line noted on the Plant Map.

The mill drainage and effluent system contains a pumping station shown on the Plant Map. Drains throughout the plant are channeled through piping and open trenches to this station before pumping to the two mill primary clarifiers. The pumping station has primary and backup electric pumps. The backup pump starts automatically by a high-level float switch. These pumps are fed from different electric services in order to maintain pumping ability during an outage on any one service. In addition, a standby diesel engine driven pump backs up the two electric pumps. This pump starts automatically by a high-high level float switch.

In the unlikely event that oil is spilled from mobile equipment or other system not listed in Section 2.2, any flow toward the Spokane River will be channeled by an asphalt berm into the pumping station as shown on the Plant Map. A secondary earth berm provides backup protection in the unlikely event that the asphalt berm does not contain the flow.

3.6 Security: §112.7(g)(1-5)

A chain link security fence surrounds the facility. The main entrance to the plant is attended by a security guard at all times. Only authorized personnel and visitors are allowed into the facility. Other gates are always locked to prevent unauthorized entry §112.7(g)(1).

Most oil systems are indoors where lighting is adequate for inspections. The clarifiers are outdoors and have dedicated lighting on bridges extending to the center of the clarifiers. Lighting is adequate to carry out inspections noted in Appendix C.

3.7 Routine Product Handling Procedures: §112.7(a)(3)(ii) & §112.8(d)(1-5)

3.7.1 Tanker Truck Loading and Unloading Procedures

1. Tank level is checked using a dipstick or sight glass to determine the required volume.
2. Prior to loading or unloading, all oil transfer equipment is inspected visually to verify safe and operational condition. Leaks in piping, loading/unloading assemblies and downspouts must be repaired before use.
3. All pipelines, valves, and loading/unloading assemblies and hose connections must be identified by product.
4. A pre-transfer conference is held between mill personnel and truck transfer operators. Topics will include product type, amounts to be transferred, transfer rate, shut down procedures, emergency procedures, etc.
5. Under no circumstances shall a truck in the process of loading or unloading be left unattended.
6. The oil pump and appropriate valves are turned on and fluid transfer is performed until the required level is reached.
7. The oil pump and appropriate valves are turned off and the amount of oil transferred is recorded in the logbook located near each tank.
8. Drains and outlets on trucks are checked for leakage before departure
9. Provisional spill containment equipment available:
    a. Material for absorbing and containing spills is available in oil spill kits located throughout the plant.
    b. Catchment area at the Truck Unloading Station will contain major spills. Yard area catchments are formed by absorbent booms if needed.
    c. Drip pans are provided at the loading and unloading area to reduce spills.
    d. Shovels are maintained at the plant site to aid in control of spills.

3.7.2 Hydraulic Systems, Lubrication Systems and Mineral Oil-Filled Electrical Equipment Loading and Unloading Procedures

1. Tank level is checked using a dipstick or sight glass to determine the required volume.
2. Prior to loading or unloading, all oil-transfer equipment is inspected visually to verify safe and operational condition. Leaks in piping, loading and unloading assemblies and downspouts must be repaired before use.
3. All pipelines, valves, and loading assemblies must be identified by product.
4. Under no circumstances shall a reservoir in the process of loading or unloading be left unattended.
5. The oil pump and appropriate valves are turned on and the fluid transfer is performed until the required level is reached.
6. Provisional spill containment equipment available:
    a. Material for absorbing and containing spills is available in oil spill kits located throughout the plant.
    b. Catchments for a major spill are formed by absorbent booms if needed.
    c. Drip pans are provided at the loading and unloading area to reduce spills.
    d. Shovels are maintained at the plant site to aid in control of spills.

3.7.3 Mobile Equipment Fueling

1. All vehicles to be fueled will be parked near the diesel tank.
2. Prior to fueling, all Diesel transfer equipment is inspected visually to verify safe and operational condition. Leaks in pump, hose, or nozzle must be repaired before use.
3. The Mobile Equipment Diesel tank must be labeled.
4. Under no circumstances shall a vehicle in the process of fueling be left unattended.
5. The diesel pump and appropriate valves are turned on and the fluid transfer is performed until the required level is reached.
6. After fueling is completed, the driver will disconnect hose and replace nozzle prior to departure.
7. Provisional spill containment equipment available:
    a. Material for absorbing and containing spills is available in the oil spill kit at the Effluent Pump House.
    b. Spill catchments are formed by absorbent booms if needed.
    c. Shovels are maintained at the plant site to aid in control of spills.

4. SPILL PREVENTION AND RESPONSE

4.1 Inspections and Records: §112.7(e) & §112.8(c)(6)

Mill primary and secondary effluent clarifiers receive detailed inspections during each operating shift. Shift supervisors and operators look for signs of oil floating on the surface. The written checklist is included in Appendix C. Completed checklists are filed for a period of 3 years in IEP's pulp mill or environmental files.

The water-cooled electrical transformers are inspected during each operating shift by the boiler operator. The water-cooled transformer temperatures are checked and recorded on a written checklist included in Appendix C. Completed checklists are filed for a period of 3 years at IEP's boiler control house or environmental files.

Levels of fuel tanks listed in Section 2.2.9 are recorded in logbooks near the tanks. The mill's diesel provider logs levels in the books at the time of delivery.

Oil-containing process and storage equipment, secondary containment, piping, valves, joints, flanges, pumps, hoses, and/or other associated equipment receive a weekly inspection for general condition and signs of leakage. The written procedures and a checklist are included in Appendix C. They are maintained on a continuing basis and retained for three years in IEP's pulp mill or environmental files.

Oil-containing electrical equipment, secondary containment, drain valves, joints and flanges receive a detailed weekly inspection for general condition, leaks, tank levels and operating temperature. Written procedures and an example record of inspection are included in Appendix C.

Mill bulk storage tanks receive routine visual inspections as detailed in Section 3.1. Because the electrical and operating equipment are exempt from bulk container requirements of 40 CFR 112.8(c), no pressure type or cell integrity testing is planned for the oil filled electrical equipment, hydraulic systems or lubrication systems at this facility.

Visible leaks resulting in loss of oil from tank seams, gaskets, valves, and bolts will be corrected promptly after discovery during these or other inspections.

4.2 Personnel Training: §112.7(f)(1-3)

Inland Empire Paper Company's plant employees who use or manage oil and oil-containing substances are trained in the operation, maintenance, and handling of equipment and materials to prevent oil spills. Each person receives oil spill awareness training annually or as otherwise specified below:

- When the SPCC Plan is initially developed or modified;
- Before beginning work assignments as new employees; and
- Whenever the employee's responsibilities or designated action under the SPCC Plan changes.

Inland Empire Paper Company's training plan will ensure the following:

1. No person will be allowed to operate the oil-containing storage, handling, or process equipment of this facility until he/she has read and understood the handling procedures outlined in this plan and has demonstrated ability to operate such equipment in the prescribed manner.

2. No person will be permitted to operate the oil-containing storage, handling, or process equipment unless that person can demonstrate the following:
    a) Knowledge of the process containing the oil substance.
    b) Knowledge of the grades and names of all products handled.
    c) Knowledge of all storage tanks and products associated with the system.
    d) Knowledge of location and operation of all piping and valves associated with the system.
    e) Knowledge of location and operation of all safety equipment.
    f) Knowledge of emergency shutdown system.
    g) Knowledge of location of all oil spill kits.
    h) Knowledge of correct methods for using equipment and materials in the kits
    i) Knowledge of all operating and spill contingency procedures outlined in the SPCC plan.
    j) Ability to gauge and convert to gallons.

Spill prevention briefings for operating personnel are conducted a minimum of once per year (§112.7(f)(3)) to assure adequate understanding of the SPCC Plan. Records of briefings are kept by the Human Resources Department (HR). These briefings highlight and describe known spill events, causal factors, and preventative measures. Topics for presentation should include:

- Reviews of any spill events and actions taken;
- Malfunctioning components which may cause or contribute to a spill;
- Updated spill prevention measures; and,
- Any modifications to the SPCC plan of significance.

4.3 Spill Response Equipment: §112.7(a)(3)(iv)

Oil spill containment/cleanup equipment shall be stored in labeled weatherproof containers located in the following locations as shown on the plant map:

Map Symbol	Spill Kit	Map Symbol	Spill Kit
SK #1	#5 Paper Machine Basement	SK #5	ONP Truck Dumper
SK #2	Effluent Pump House	SK #6	West Dock
SK #3	Refiner Operating Floor	SK #7	# 5 Refiner Ground Floor
SK #4	Roll Wrap Hydraulic Area	SK #8	Chip Truck/Railcar Dumper

These containers will at a minimum hold:

Spill Kit Contents			
Qty	**Item**	**Qty**	**Item**
4	Absorbent Pigs	1	Bag of Absorbent
1	Roll of Caution Tape	1	Empty container
1	Shovel	20	Absorbent Pads
2	10ft Booms	1	Roll of Garbage Bags
1	Scoop	1	Squeegee

These “spill kits” are designed to provide tools and materials to construct containment barriers, absorb free product, and remove and store spilled product during short-term emergency response activities by personnel who first discover the release. The oil spill response equipment is not intended to contain or cleanup a major release. In this event, mill personnel will immediately notify the mill spill prevention officer listed in 1.2.

An inventory of all facility spill kits is made at a minimum quarterly. Restocking and replacement of the oil spill response equipment occurs after use or as a result of these inspections. A copy of the inventory checklist is included in Appendix E.

4.4 Spill Response Procedures: §112.7(a)(3)(v) & §112.7(a)(4-5)

The following spill response procedures will generally be followed, as appropriate, for situations involving spills or releases. Procedures are reviewed and upgraded when appropriate to improve operations and reduce the possibility of petroleum product spills. Under no circumstances should any person undertake cleanup activities for which they have not received the proper training.

1. Determine if a spill has occurred.
2. Secure the area and evaluate the situation for personnel safety:
    a) Use caution tape to keep non-involved personnel away from the spill area
3. Stop the release if safely possible:
    a) Close valves.
    b) Close off holes with nonmetallic plugs or caps.
    c) Shut off pumps or other process equipment as appropriate.
    d) If applicable, remove product from the tank to below the level of the leak.
4. Identify and mitigate fire, hazards:
    a) Eliminate possible sources of ignition.
    b) Extinguish fires and smoking materials.
    c) Remove or shut off engines, if necessary.
    d) Shut off or isolate electrical power, if necessary.
5. Contain the spill and stop it from spreading:
    a) Determine if spill is large enough to be reclaimed by contractors. If it is, surround the spill with absorbent pigs, booms, etc. to isolate and contain. If the spill is not large enough to reclaim soak up spill with absorbent materials.
    b) Identify drainage routes of spill and locate capture site.
    c) Isolate the drainage to a capture site using booms, absorbent pigs, earth dams, etc. Blocking drainage using response materials is preferred over ditching when practical.
    d) If possible, do not allow oil to flow into indoor floor drains or outdoor storm drains.
    e) Install “CAUTION” tape or other temporary barriers to prevent unauthorized personnel from entering the spill area.
6. Cleanup spill and/or assist spill response contractor:
    a) Mill supervisor on duty shall call the spill prevention person listed in section 1.2
    b) If necessary, the supervisor or spill prevention person will call Big Sky Industrial, (509) 624-4949 to assist with cleanup and/or reclamation for oil recycle.
    c) Continue to monitor and mitigate fire and safety hazards posed by vapors or free product.
    d) If spill enters any storm or floor drains, monitor primary clarifiers for signs of oil. Soak up oil from the water surface with floating absorbent pads.
    e) Ponded product may be pumped or vacuumed into storage tanks or 55-gallon drums for off-site removal. Storage of collected product shall be placed inside secondary containment. Pumping or vacuum equipment shall be explosion proof or HAZMAT rated. Any recovered product that will not be reused shall be disposed of according to applicable state and federal requirements.
    f) Clean the affected ground surfaces of residual product.
    g) Dispose of all contaminated cleanup materials properly and according to applicable state and federal requirements.
    h) Final treatment and remediation for the site cleanup are beyond the scope of this document. A site-specific remediation plan will be developed as necessary by Inland Empire Paper Company.
7. Report and document:
    a) Document the spill as outlined in Section 5.1.
    b) Complete the spill documentation form.

As outlined in Section 5.1 below, Inland Empire Paper Company is responsible for appropriate notification and major cleanup decisions such as cleanup contractor selection, etc.

5. SPILL REPORTING AND REQUIREMENTS

5.1 Spill Reporting and Documentation: §112.7(a)(3)(vi) & §112.7(a)(4)

Any spill to water or to land must be reported immediately to the Inland Empire Paper Company designated spill prevention officer designated in 1.2. This officer shall complete the Spill Documentation Form included in Appendix F and ensure that the proper notifications are given to the state and federal agencies.

Reporting of environmental spills is regulated in the State of Washington by the Revised Code of Washington (RCW) Sections 90.48 and 90.56. Spills will be reported to the Washington Department of Ecology (DOE) 24-hour Oil & Hazardous Materials Spill reporting hotline telephone number given in Section 9.0. Spills will be reported as required in the following sections.

Note that all pertinent emergency contact numbers may be found in the Emergency Contact List in Section 5.2.5.

5.2 Spill Notification Requirements

The spill notification requirements for the State of Washington Department of Ecology (DOE) and other federal agencies are described below.

5.2.1 Ecology Notification Requirements

The DOE notification requirements are described below.

Immediate Department of Ecology and NRC Reporting Requirements

According to DOE, the National Response Center must be notified immediately and DOE must be notified within 24 hours if any on the following conditions apply:

- A spill is in progress and out of control;
- The quantity of oil spilled presents a threat to human health or the environment; or
- The spill is threatening a waterway.

Note: DOE considers drainage ditches and storm water retention basins to be waterways.

Washington Emergency Management Division:
24-hour Spill Reporting: (Whoever Answers)
Oil Spills: 1-800-258-5990 or 1-800-OILS-911

National Response Center: 1-800-424-8802

In order to respond properly, the Inland Empire Paper Company spill prevention officer must provide the agencies responding to the call with the correct information.

When Inland Empire Paper Company personnel contacts the National Response Center, the NRC staff person will ask for the following information contained in the Discharge Notification Form below. A written report summarizing the spill event and corrective actions taken should be submitted to Washington Department of Ecology within one month of the event by the Inland Empire Paper's spill prevention officer listed in 1.2.

Post Cleanup Notification Requirements

Discharge Notification Form - In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center:

Form 1 - Information provided to the National Response Center in the Event of a Discharge			
Discharge/Discovery Date		Time	
Facility Name	Inland Empire Paper Company		
Facility Location	3320 N Argonne Rd Spokane WA, 99212	Latitude, Longitude 47.689167N,117.26667W	Water Body ID 57-1010
Name of reporting individual		Telephone #	
Type of material discharged		Estimated total quantity discharged	Gallons/Barrels
Source of the discharge		Media affected	☐ Soil ☐ Water (specify) ☐ Other (specify)
Actions taken			
Damage or injuries	☐ No ☐ Yes (specify)	Evacuation needed?	☐ No ☐ Yes (specify)
Organizations and individuals contacted	☐ National Response Center (800-424-8802) Time ☐ Cleanup contractor (Big Sky Industrial (509-624-4949)) (Specify) Time ☐ Facility personnel (Specify) Time ☐ State Agency (DOE 509-329-3400) (Specify) Time ☐ Other (Specify) Time		

5.2.2 Immediate Environmental Protection Agency (EPA) Reporting

EPA has established requirements to report spills to navigable waters (essentially any natural surface waters in the U.S.) or adjoining shorelines. Specifically, EPA requires owners or operators of facilities to report an oil spill to the federal government if it is large enough to be harmful to public health, public welfare, or the environment. EPA has determined that discharges of oil in quantities that may be harmful include those that:

- Violate applicable water quality standards;
- Cause a film or "sheen" upon, or discoloration of the surface of the water or adjoining shorelines; or
- Cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

The requirement for reporting oil spills stems from EPA's Discharge of Oil Regulation, which has come to be known as the “sheen rule.” Under this regulation, reporting oil spills to the federal government does not depend on the specific amount of oil spilled, but instead relies on the presence of a visible sheen created by the spilled oil.

EPA Region 10: (206) 553-6284

5.2.3 Immediate National Response Center (NRC) Reporting

The NRC is the sole federal point of contact for reporting oil and chemical spills; however, in order to facilitate more effective and efficient coordination of response resources, notification should be given to EPA Region 10 in conjunction with any report to the NRC. Section 311(b)(5) of the Federal Water Pollution Control Act, Section 306(a) of the Outer Continental Shelf Lands Act Amendments of 1978, and Section 16(b) of the Deepwater Ports Act of 1974, require that the responsible party notify the National Response Center as soon as they are knowledgeable of an oil spill from a vessel or facility operating:

- In or along U.S. navigable waters;
- On the Outer Continental Shelf;
- In a deep-water port; or,
- From a vessel transporting oil from the Outer Continental Shelf.

National Response Center: (800) 424-8802

5.2.4 SPCC Plan Submission Requirements: §112.4(a)

Inland Empire Paper Company must submit to the Regional Administrator of the Federal Environmental Protection Agency (EPA), within sixty days of the event, the following information should there be a discharge of more than 1,000 U.S. gallons of oil in a single discharge as described in 40 CFR 112.1(b), or discharged more than 42 U.S. gallons of oil in each of two discharges as described in 40 CFR 112.1(b) occurring within any twelve month period:

- Name of facility;
- Name of owner or operator;
- Maximum storage or handling of the facility and normal daily throughput;
- Corrective action and countermeasures taken, including a description of equipment repairs and replacement;
- An adequate description of the facility including maps, flow diagrams, and topographical maps, as necessary;
- The cause of the discharge as described in 40 CFR 112.1(b), including a failure analysis of the system or subsystem in which the failure occurred;
- Additional preventive measures you have taken or contemplated to minimize the possibility of recurrence; and,
- Such other information as the Regional Administrator may reasonably require pertinent to the SPCC Plan or discharge.

As of July 17, 2002, 40 CFR 112.1(b) describes a discharge as "…oil in quantities that may be harmful, as described in part 110 of this chapter, into or upon the navigable waters of the United States or adjoining shorelines, or into or upon the waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or the Deepwater Port Act of 1974, or that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of the United States (including resources under the Magnuson Fishery Conservation and Management Act)…"

As of January 1, 1999, 40 CFR 110 defines discharges of oil in harmful quantities to include discharges of oil that:

- Violate applicable water quality standards; or,

Cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines, or cause sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

5.2.5 Emergency Contact Information

In the event of an emergency at the facility, the following contacts are to be made:

Emergency Contact List	
Contact Organization / Person	**Telephone Number**
National Response Center (NRC)	1-800-424-8802
Cleanup Contractor(s) Big Sky Industrial, (509) 624-4949	(509) 624 - 4949
Key Facility Personnel	
Designated Person Accountable for Discharge Prevention: Doug Krapas *Environmental Manager*	Office: (509) 720 - 5815 Emergency: (208) 661-5526
Kevin Davis *Production Manager*	Office: (509) 720 - 5826 Emergency: (509) 999-9726
Ben Carleton *Technical Superintendent*	Office: (509) 720 - 5827 Emergency: (208) 505-4503
Tanner Gerety *Pulp Mill Supervisor*	Office: (509) 720 - 5824 Emergency: (509) 939-9289
John Nelson *Paper Machine Superintendent*	Office: (509) 720 - 5864 Emergency: (509) 936 - 5898
State Oil Pollution Control Agencies	1-800-OILS-911 1-800-258-5990
Other State, Federal, and Local Agencies EPA Region X Washington Department of Ecology (DOE) Spokane City & County Emergency Management	 Office 1-800-424-4372 Emergency Response: (206) 553 - 6284 1-509-329-3400 (509) 477 - 2204
Local Fire Department	911
Local Police Department	911
Hospital Valley Hospital 12606 E Mission Ave Spokane WA, 99216	(509) 924 - 6650

Appendix A

Certification of Substantial Harm Determination Form

Attachment C-II, 40 CFR 112
Certification of the Applicability of the Substantial Harm Criteria

FACILITY NAME: Inland Empire Paper Company Millwood Plant
FACILITY ADDRESS: Spokane, Washington

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

YES_____ NO___X_____

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

YES_____ NO___X_____

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and II to DOC/NOAA's "Guidance For Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (59 FR 14713, March 29, 1994) and the applicable Area Contingency Plan.

YES_____ NO___X_____

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility would shut down a public drinking water intake[2]?

YES_____ NO___X_____

5. Does the facility have a total oil storage capacity greater or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

YES_____ NO___X_____

CERTIFICATION
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

_____ _____
Signature Title

_____ _____
Name (please type or print) Date

[1] If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.
[2] For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c).

Appendix B

Plant Maps

Appendix C

Spill Prevention Inspection and Records:

Boiler Operator Logsheet

Month_____Year_____

Date	Transformer Temperatures												Fuel Oil Tank Level
	Shift-1						Shift-2						
	#1 T11	#2 T12	#3 T13	#4 T121	#5 T125	#6 T15	#1 T11	#2 T12	#3 T13	#4 T121	#5 T125	#6 T15	
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
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25													
26													
27													
28													
29													
30													
31													

Inspection Date _____

Inspector _____

	Containment	Transformers		
	Leaks?	Leaks?	Levels OK?	Temp. OK?
#5 PM Substation T3000, T3001, T3002, T3003 T3004, T3010, T3011, T3012 T3020, T3021, T3022, T3023 T3030, T3031				
#2 PM West Substation T1300, T1301				
T3 Substation T3				
Transformer station basement T11, T12, T121, T125, T13 T15, CT's, PT's, S10				
Deink Substation T1310				
Effluent Substation T241				
Pulp Screening Substation T210				
T4 & T5 Substation T4,T5				
No.5 Refiner Substaion T321,T322				

List any corrective actions here:

_____

_____

_____

Cleaning out T1300, T1301, and T1310 Transformer Containment Areas

1) Transformer containment area shall be drained by a qualified electrician responsible for substation maintenance.
2) If the containment has liquid in it.
    a) Determine the source of the liquid.
    b) Check for presence of oil.
3) If oil is present, contact a supervisor for further instructions.
4) If liquid is oil-free, use sump pump to pump water to mill sewer.
5) Make sure sump pump is unplugged or switched off before leaving.

Cleaning out T210 Transformer Containment Area

1) Transformer containment area shall be drained by a qualified electrician responsible for substation maintenance.
2) Drain water into a separate container. Look for oil as the container fills. Empty oil-free water to the mill sewer and refill as necessary until tank is empty. Any oil will be on top of the water and will be the last liquid to drain from the tank.
3) If oil is present, contact a supervisor for further instructions.
4) Make sure drain valve is locked before leaving.

Cleaning out T241,T321,T322,T4,T5 Transformer Containment Areas

1) Transformer containment area shall be drained by a qualified electrician responsible for substation maintenance.
2) If the containment has liquid in it.
    a) Determine the source of the liquid.
    b) Check for presence of oil.
3) If oil is present, contact a supervisor for further instructions.
4) If liquid is oil-free, open drain valve to drain containment.
5) Make sure drain valve is locked before leaving.

Cleaning out T3 Transformer Containment Area

1) Servicing of containment shall be performed by a qualified electrician responsible for substation maintenance.
2) Transformer containment area drains through a polymer bead basket. When in contact with oil, the beads swell and stop flow immediately.
3) If the containment has liquid in it.
    a) Determine the source of the liquid.
    b) Check for presence of oil.
    c) If oil is not present check for debris on top of drain. Remove it and flow should return.
4) If oil is present, contact a supervisor for further instructions. If required, contact purchasing to order a new polymer bead kit

Cleaning out T3000 Series Transformer Containment Area

1) Servicing of containment shall be performed by a qualified electrician responsible for substation maintenance.
2) Transformer containment area drains through a polymer bead basket. When in contact with oil, the beads swell and stop flow immediately.
3) If the containment has liquid in it.
    a) Determine the source of the liquid.
    b) Check for presence of oil.
    c) If oil is not present check for debris on top of drain. Remove it and flow should return.
4) If oil is present, contact a supervisor for further instructions.
5) If required, contact purchasing to order a new polymer bead kit. Oil-free water can be drained by opening hand valve.
6) Make sure drain hand valve is locked before leaving.

Cleaning out Chip Truck/Railcar Dumper Cylinders Containment Area

1) Transformer containment area shall be drained by a qualified electrician responsible for substation maintenance.
2) If the containment has liquid in it.
    a) Determine the source of the liquid.
    b) Check for presence of oil.
3) If oil is present, contact a supervisor for further instructions.
4) If liquid is oil-free, open drain valve to drain containment.
5) Make sure drain valve is locked before leaving**.**

Cleaning out Truck Unload Chemical Containment Area

1) If the containment has liquid in it.
    a) Determine the source of the liquid.
    b) Check for presence of oil.
    c) Check for presence of color
    d) Check pH of liquid.
2) If oil or color are present or if pH is out of range contact a supervisor for further instructions.
3) If liquid is oil & color free and the pH is between 6 and 8 transfer to mill sewer.

Note: Treat all materials as hazardous until they are tested.

DAILY SPCC INSPECTION LOG

MONTH & YEAR: _____

√ indicates "in compliance" or no leaks
NA indicates "not applicable"
P indicates potential problems

CHECK	Mon		Tues		Wed		Thurs		Fri		Sat		Sun	
	1st shift	2nd shift	1st shift	2nd shift	1st shift	2nd shift	1st shift	2nd shift	1st shift	2nd shift	1st shift	2nd shift	1st shift	2nd shift
DATE of Inspection														
TIME of Inspection														
INITIALS of Inspector														
Pulp Mill Oil Containment														
Any leaks in hydraulic systems for ONP truck dumper?														
Any leaks in hydraulic systems for chip truck/railcar dumper?														
Any uncontrolled leaks in oil system for #1 refiner line														
Any uncontrolled leaks in oil system for #2 refiner line														
Any uncontrolled leaks in oil system for #3 refiner line														
Any uncontrolled leaks in oil system for #4 refiner line														
Any uncontrolled leaks in oil system for #5 refiner line														
Any uncontrolled leaks in oil system for higrade refiners														
Any uncontrolled leaks in oil system for #5 refiner line														
General Mill Area														
Any evidence of oil in the mill sewer trenches														
Any evidence of an oil sheen on the primary clarifiers?														
Any evidence of an oil sheen on the secondary clarifier?														

Comments:

WEEKLY ENVIRONMENTAL INSPECTION LOG

MONTH & YEAR: _____

EMPLOYEE SIGNATURE: _____

√	indicates "in compliance"
NA	indicates "not applicable"
P	indicates potential problems

WEEK					CHECK
1	2	3	4	5	
					DATE of Inspection
					TIME of Inspection
					STORMWATER RUNOFF COLLECTION SYSTEM
					Any sign of process pollution in drywells on back side of mill?
					Any sign of process pollution in drywells on west side of mill?
					Any sign of process pollution in drywells in front of mill?
					Any sign of process pollution in drywells on east side of mill?
					Any sign of process pollution in 208 swales?
					Any sign of process pollution on river bank?
					Chemical Storage Spill Containment Areas
					Any leaks in Deink chemical storage areas?
					Any leaks in Orbal chemical storage areas?
					Any leaks in PM2 basement containment area?
					Any leaks around diesel fuel tank?
					Housekeeping in spill containment area?
					Hazardous Waste Collection
					Are wastes stored in collection areas?
					Are waste hazards identified and dated?
					Are all stored containers with hazardous wastes sealed?
					Are all parts washers covered?
					Are all containers in satelite area clearly marked?
					Good house keeping around mill?
					Good housekeeping around paper machine?
					Good housekeeping around pulp mill?
					Good housekeeping around wastewater treatment system?
					Good housekeeping around chip yard?

Comments:

Appendix D

Annual Training Logs

IEPCO Oil-Handling Personnel Training and Briefing Log		
Date	**Description / Scope**	**Attendees**

Appendix E

Oil Spill Response Kit Inventory Check Sheet

Quarterly Oil Spill Response Kit Check Sheet									
Qty	**Item**	SK#1	SK#2	SK#3	SK#4	SK#5	SK#6	SK#7	SK#8
4	Absorbent Pigs								
1	Roll of Caution Tape								
1	Shovel								
2	10ft Booms								
1	Kitty Litter Scoop								
1	Bag of absorbent								
1	Empty container								
2	Rolls absorbent Padding								
10	Empty Garbage Bags								

Date:_____ Initials:_____ All Missing Items Restocked? _____ Restock Date:_____

Appendix F

Spill Documentation Form

In the event of a discharge of oil to navigable waters or adjoining shorelines, the following information will be provided to the National Response Center **[also see the notification information provided in Section 5.2.5 of the Plan]**:

Spill Notification Document			
Discharge/Discovery Date		Time	
Facility Name	Inland Empire Paper Company		
Facility Location	3320 N Argonne Spokane, WA 99212	Latitute, Longitude 47.689167N,17.26667W	Water Body ID 57-1010
Name of reporting individual		Telephone #	
Type of material discharged		Estimated total quantity discharged	Gallons/Barrels
Source of the discharge		Media affected	☐ Soil ☐ Water (specify) ☐ Other (specify)
Actions taken			
Damage or injuries	☐ No ☐ Yes (specify)	Evacuation needed?	☐ No ☐ Yes (specify)
Organizations and individuals contacted	☐ National Response Center 800-424-8802 Time		
	☐ Cleanup contractor (Specify) Time		
	☐ Facility personnel (Specify) Time		
	☐ State Agency (Specify) Time		
	☐ Other (Specify) Time		

Appendix G

NPDES Permit Requirements: Spill Plan Review & List of Oils and Chemicals On-site

Annual Review Logs (Per NPDES Permit No. WA-000082-5 S12):

By signing below, I am certifying that I have completed an annual review and evaluation of the Spill Plan for this facility as required by NPDES Permit No. WA-000082-5 Section S12, and will/will not amend this Plan as a result.

Review and Evaluation of SPCC Plan			
Review Date	Plan Amendment		Name and signature of person authorized to review this Plan
	Will Amend	Will Not Amend	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	
	☐	☐	

Review Date	Description of Amendment	Name and signature of person certifying this amendment

	INLAND EMPIRE PAPER CO.									
	TIER 2 CHEMICAL LISTING		2021							
#	TIER II NAME	PRODUCT NAME	PURPOSE/USE	CAS NUMBER	TRADE SECRET	MIXTURE	SOLID, LIQUID, GAS	INVENTORY (LBS) MAX	INVENTORY (LBS) AVG	CONTAINER TYPE
1	Acetic Acid in Triphenylmethane Dyes	Basazol, Pergasol	Paper grade shading	64-19-7	Y	Y	L	41,800	5,038	Tote
2	Adipic Acid Polyacrylamide	Fennopol K8805	Sludge flocculation polymer	124-04-9	Y	Y	S, L	24,802	16,369	Supersack, Tank
3	Aliphatic Hydrocarbon	Zetag 8812S	Primary clarifier flocculation aid	8052-41-3	Y	Y	L	29,928	10,820	Tote
4	Alkyldimethylbenzyl Ammonium Chloride	Fennosan Q-10	Biocide, paper machine	68391-01-5	Y	Y	L	8,480	3,392	Tote
5	Amide	Zetag 4145	DAF flocculation aid	9003-05-8	Y	Y	S, L	4,000	2,000	Supersack, Tank
6	Ammonium Hydroxide	Aqua Ammonia	WWTS nutrient, FBC NOx control	1336-21-6			L	27,114	14,850	Tanks
7	Boiler Treatment	Nexguard 22310	Boiler water internal treatment	[BLANK]	Y	Y	L	5,385	2,692	Tote
8	Calcium Carbonate	GCC, Limestone	Paper machine filler	1317-65-3			L	963,200	778,000	Railcar, Tank
9	Citric Acid		WWTS UF cleaner	77-92-9			L	8,813	3,085	Tote
10	Diesel Fuel #2		Fuel	68476-34-6		Y	L	5,658	4,809	Tank, Engine
11	Diethylethanolamine	Nalco Tri-Act 1826	Boiler water corrosion inhibitor	100-37-8	Y	Y	L	10,940	4,157	Tote
12	Ethoxylated Alcohol	Infinity PK2732	Refiners pitch dispersant	68439-46-3	Y	Y	L	25,674	9,842	Tote
13	Fatty Acid Surfactant	Fennoflot 4031	Deink flotation aid	9004-96-0	Y	Y	L	80,783	34,408	Tank
14	Fluorescent Brightener	Tafluonol UF-1	Optical brightener	16470-24-9	Y	Y	L	128,525	72,750	Tote
15	Gasoline		Fuel	8006-61-9		Y	L	1,998	899	Tank
16	Glycol Conditioner	Presstige FB9050	Felt wash	107-21-1	Y	Y	L	4,406	3,305	Tote
17	Hydrogen Peroxide		Oxidative pulp bleaching	7722-84-1			L	1,226,564	1,012,417	Railcar, Tank
18	Magnesium Nitrate	AMA-415	Biocide, chemical makedown	10377-60-3	Y	Y	L	4,488	2,244	Tote
19	Magnesium Silicate	Talc	Deink detackifier	14807-96-6			S, L	242,500	111,500	Supersack, Tank
20	Oxylated Alcohol, C12-18	Nalcoat 2610	Roll cleaner	69227-21-0	Y	Y	L	6,951	3,046	Tote
21	Oxylated Alcohol, C16-18	Fennoflot 5313	Deink surfactant	68439-49-6	Y	Y	L	5,205	2,082	Tote
22	Paraffin Wax Defoamer	Foambrake 144	WWTS / Pulp mill defoamer	8002-74-2	Y	Y	L	65,800	44,829	Tank, Tote
23	Pentaacetic acid (DTPA)		Metallic sequestering agent	140-01-2		Y	L	42,121	19,937	Tote
24	Petroluem Distillates	Mineral oil	Machine oil, lubrication	64742-47-8			L	47,500	38,000	Barrels

25	Phosphoric Acid		WWTS nutrient	7664-38-2			L	44,829	26,897	Tank, Tote, Barrel
26	Polyacrylamide	Percol 175	Retention aid polymer	9003-05-8	Y	Y	S, L	23,835	11,719	Bin, Supersack
27	Polyaluminum chloride	PAX-18	Sludge coagulant	1327-41-9			L	49,582	24,010	Tank
28	Polyamine Coagulant	Catiofast 269	TMP pitch control, paper machine coagulant	[BLANK]	Y	Y	L	24,219	11,625	Tote
29	Polymer, Retention/Drainage	Perform PK2320	Paper machine retention aid, coagulant	[BLANK]	Y	Y	L	55,044	22,678	Tote
30	Propane		Fuel	74-98-6		Y	L, G	4,240	1,908	Tank
31	Sodium Bisulfite	Nalco BC1011	Boiler water oxygen scavenger	7631-90-5	Y	Y	L	2,602	2,342	Tote
32	Sodium Hydrosulfite	V-Brite	Reductive pulp bleaching	7775-14-6	Y	Y	S, L	115,072	53,965	Bin
33	Sodium Hydroxide	Caustic Soda	Oxidative bleaching pH control	1310-73-2			L	739,610	551,501	Railcar, Tank
34	Sodium Hypochlorite	Liquichlor, bleach	Biocide, WWTS UF cleaner	7681-52-9			L	8,700	2,255	Tote
35	Sodium Metabisulfite	Meta	Oxidative bleaching neutralizer	7681-57-4			S, L	108,000	59,000	Supersack
36	Sodium Silicate		Deink flotation aid, oxidative bleaching buffer	1344-09-8			L	98,583	60,922	Tank
37	Soybean Oil Hydrocarbon	Afranil MHTC	Paper machine oxygen scavenger	8001-22-7	Y	Y	L	20,816	7,910	Tote
38	Urea		WWTS nutrient	57-13-6			L	154,595	72,684	Tank

Appendix H

Avista SPCC Plan

Inland Empire Paper Substation
Millwood, Washington

Spill Prevention Control and Countermeasure Plan
(SPCC PLAN)

Prepared for Avista Utilities by:

Spokane Environmental Solutions, LLC
3810 E. Boone Avenue, Suite 101,
Spokane, WA 99202
Telephone: 509.688.5376
and HydroCon Environmental, LLC

December 2021
In the event of a spill call the Spill Phone at 509-998-0996