

**WOODLAND PULP LLC
ST. CROIX TISSUE INC.
COLLECTIVELY WOODLAND
Environmental Guidance Statement
Exhibit H
Drum and Container Management**

APPLICABILITY TO WOODLAND PULP LLC and ST. CROIX TISSUE, INC.

This Guidance Statement applies to the on-site handling and storage of drums and containers used at WOODLAND facilities. It also provides guidance on proper disposal methods for steel, fiber and polyethylene drums, pails, cans and other containers. **Empty drums and containers are addressed in the ISO Work Instruction WI 11.01 Empty Container Management.**

WOODLAND promotes a drum-free policy for all facilities; therefore, the WOODLAND drum policy should be followed whenever possible. If for some reason drums are required on the property, this guidance should be followed.

EXEMPTIONS/EXCLUSIONS

- Requirements for handling, labeling, storage and disposal of drums and containers of hazardous and/or universal waste are not included in this Guidance Statement. These requirements are covered in ISO Work Instruction WI 07.01 Hazardous, Universal and Biomedical Waste Management.
- Requirements for handling, labeling, storage and disposal of drums and containers containing PCBs are not included in this Guidance Statement. PCB's above regulatory thresholds are no longer found or allowed on Woodland property. Should an unexpected issue arise contact the Environmental Department.
- Requirements for handling, labeling, storage and disposal of drums and containers containing used oil are not included in this Guidance Statement. These requirements are covered in ISO Work Instruction WI 08.01 Oil Waste (Used Oil) Management.
- Requirements for disposal of aerosol cans are not included in this Guidance Statement. These requirements are covered in ISO Work Instruction WI 07.01 Hazardous, Universal and Biomedical Waste Management.

REGULATORY REMINDERS

Regulatory Reminders do not include all of the federal regulations but list some of the general regulations applicable to this guidance statement. If this guidance statement applies to your facility, you should review the regulation to ensure that you are meeting all the requirements of the entire regulation.

DRUM AND CONTAINER MANAGEMENT REGULATORY REMINDERS

1 DRUM & CONTAINER LABELING

All drums and containers containing **hazardous** materials shall be legibly labeled or marked with their contents and meet all applicable OSHA and DOT requirements.

2 REGULATIONS REGARDING DRUM MANAGEMENT

Hazardous Waste and SPCC regulations have specific requirements related to drum handling and storage. These must be followed when these regulations apply.

WOODLAND REQUIREMENTS

In addition to the Federal, State and Local regulations that are applicable to drum and container management, WOODLAND requires certain steps beyond the regulatory requirements. These requirements **will be** included in the scope of environmental audits of WOODLAND facilities. This is to ensure that facilities will have the systems and measures in place to sustain compliance and/or meet WOODLAND's environmental goals.

DRUM AND CONTAINER MANAGEMENT **WOODLAND PULP LLC and ST. CROIX TISSUE INC. REQUIRED PRACTICES**

1 CONTRACTOR DRUMS & CONTAINERS

Drums and containers brought onto WOODLAND property by contractors shall be managed in compliance with this Guidance Statement. Separate areas shall be designated for drums and containers owned by WOODLAND contractors. When leaving the WOODLAND property, contractors shall remove any drums and containers they brought on the property. Drums or containers with less than 1 inch of material in them are considered empty and should be disposed of properly as outlined in **ISO Work Instruction WI 11.01 Empty Container Management**.

RECOMMENDED PRACTICES

There are a number of Recommended Practices (RPs) that WOODLAND contractors may want to follow regarding drum and container management. In addition to these recommended practices, all Federal, State and Local regulations that are applicable to drum and container management must be followed. See referenced Work Instructions and Procedures. Contractors are encouraged to follow these practices unless there are site-specific conditions that preclude their application. These practices **will be** included in the scope of environmental audits of WOODLAND facilities.

DRUM AND CONTAINER RECOMMENDED PRACTICES

RP1 DRUM & CONTAINER LABELING

All drums and containers should be legibly labeled or marked with their contents. This will allow the facility to easily distinguish between material utilized on site and waste material.

RP2 DRUM & CONTAINER CONDITION

All drums and containers shall be stored with covers on and bungs in place, and should be free of excessive rust or corrosion. Drums showing excessive signs of deterioration should be replaced or put in an overpack drum.

RP3 DRUM & CONTAINER SECONDARY CONTAINMENT

Drums and containers should be stored in diked or bermed areas, where necessary. Pallets with built-in secondary containment are commercially available in many styles and sizes. These devices should be used if diked or bermed areas are not otherwise available at the facility. Petroleum products in container of 55 gallons or greater must have secondary containment equal to the volume of the largest container with 110% capacity of the largest container recommended.

RP4 DRUM & CONTAINER STORAGE

Drums and containers containing hazardous material should be stored in specifically designated areas protected from ignition sources, sparks, flames, excessive heat, hot work areas and away from forklift or other vehicular traffic. Random and uncontrolled storage of individual drums and containers around WOODLAND facilities should not be practiced unless in use for day-to-day process operations.

RP5 OUTSIDE DRUM & CONTAINER STORAGE

Drums and containers stored outside of WOODLAND facilities should be in covered areas to minimize effects of precipitation and other adverse weather conditions. If roofed or shed storage is not reasonable, drums should be stored on their side on racks.

RP6 DRUM & CONTAINER INSPECTIONS

Routine and periodic inspection of drum and container storage areas should be conducted and documented by WOODLAND personnel who work in the area where the drums and containers are stored. The Environmental Department will determine the frequency for inspection, but monthly inspections are recommended. For shorter term contractor operations and/or projects weekly is more appropriate.

RP7 DRUM & CONTAINER COMPATIBILITY

Drums and containers should be segregated according to compatibility of contents. Reactive materials, flammable materials and acids/caustics shall be stored in separate areas. Hazardous waste drums and drums with other hazardous materials should not be commingled.

RP8 DRUM & CONTAINER EMPTYING

All drums and containers shall be emptied of their contents in a manner that does not cause release of materials to bare soil, the ground, stormwater or sanitary sewer system. Whenever possible, substances in drums and containers should be used up in order to prevent generating wastes. IN all cases contents must be identified and the disposal or use method approved by the Woodland Environmental Department before hand.

RP9 EMPTY DRUMS & CONTAINER STORAGE

Empty drums and containers stored on WOODLAND facilities should be maintained in specifically designated areas with signs indicating "Empty Drum Storage." If empty drums and containers are not stored in a designated "Empty Drum Storage" area, the individual drums and containers should be labeled "empty."

RP10 REMOVAL OF WOODLAND MARKINGS FROM DRUMS & CONTAINERS

All drums and containers removed from WOODLAND property shall have all WOODLAND markings removed or painted over so that they are entirely obscured. In addition, containers destined for scrap metal or to a landfill should have components separated (i.e metal and plastic) such that the components can be disposed or recycled and as appropriate be crushed, if possible. At a minimum, holes should be punched in the container to prevent its reuse.

RP11 EMPTY DRUM & CONTAINER DISPOSAL

Empty drums and containers should not be given to employees or other unauthorized persons. The four preferred methods for disposal in order of preference are: (1) return the drum or container to the supplier or vendor who sold it; (2) sell the drum to a licensed drum recycling or reconditioning company, (3) sell the drum or container as scrap metal; and (4) send the drum or container (preferably crushed) to a licensed landfill. Returning drums and containers is generally more acceptable to the suppliers when the drums and containers are kept in good condition, free of dents, rust and corrosion. However, if any facility decides to give empty drums to employees they should be triple rinsed, the labels removed and the employee must sign a material release.

RP12 DRUM & CONTAINER VENDORS

All vendors used for disposal of WOODLAND drums and containers may be subject to evaluation of Off-Site Disposal Operations prior to the drums and containers leaving company property.

KEY REGULATORY REQUIREMENTS

The Department of Transportation governs the transportation of hazardous materials in drums and containers. These regulations are found in 49 CFR 171-179. Most significant to this Guidance Statement are the requirements for using proper containers at WOODLAND facilities. Different types of drums and containers are required to be manufactured in accordance with DOT/UN/HM181 Specifications. WOODLAND facilities shall ensure that all vendors shipping any materials to WOODLAND facilities are using drums and containers that meet the required DOT/UN/HM181 specifications.

