REGION 1
BOSTON, MA 02109

CAA 112 (r), Risk Management Plan (RMP), CAA § 112(r)(1) General Duty Clause (GDC), CERCLA § 103, and EPCRA §§ 302-313 Compliance Evaluation Inspection of:

Woodland Pulp LLC
144 Main Street
Baileyville, ME 04694

10/24/2023

Date of Inspection

Leonard Wallace

Waste and Chemical Compliance Section

1/29/2024

Date Inspection Report Approved

MARY ODONNELL Digitally signed by MARY ODONNELL Date: 2024.01.29 15:55:06 -05'00'

Mary Jane O'Donnell, Manager

Waste and Chemical Compliance Section

1/29/2024

Date Inspection Report Finalized

1/30/2024

Date Inspection Report Transmitted to Facility

Disclaimer: Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

Date: January 29, 2024

From: Leonard Wallace IV, and Andrew Meyer, USEPA Inspectors

Through: Mary Jane O'Donnell, Chief
Waste and Chemical Compliance Section

To: File

Subject: Chemical Accident Investigation and Inspection, under Clean Air Act (CAA) Risk Management Plan (RMP) Section 112(r) and Emergency Planning and Community Right-To-Know Act (EPCRA) Sections 302-312, and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 103 of Woodland Pulp LLC located in Baileyville, Maine

GENERAL INFORMATION

Facility Name: Woodland Pulp LLC

Dun and Bradstreet Number: 12-856-1235

RMP Number: deregistered (previously 1000 0011 0505)

Address: 144 Main Street
Baileyville, ME 04694

Inspector Names: Leonard B. Wallace IV, U.S. Environmental Protection Agency (EPA) Region 1
Andrew Meyer, U.S. EPA Region 1
Amy Federoff, ERG
Tyler Evans, Weston Solutions
Charles Colley, U.S. Department of Homeland Security (DHS)

Inspection Date: October 24, 2023

Type of Inspection: Risk Management Plan (RMP) CAA § 112(r); CAA § 112(r)(1) General Duty Clause (GDC), CERCLA § 103, and EPCRA §§ 302-313 Compliance Evaluation Inspection

Purpose of Inspection: This inspection was conducted as a routine EPA CAA § 112(r)/EPCRA compliance evaluation inspection. The Woodland Pulp facility in Baileyville, Maine was selected for inspection because it deregistered as a stationary source on December 2018, although previously reported as an RMP with 41,100-lbs of chlorine dioxide onsite. The Woodland Pulp facility also reported an accidental release chlorine dioxide in July 28-29, 2023.

Current Owner: Woodland Pulp LLC

Current Operator: Woodland Pulp LLC
Product Trade Name: N/A

Primary NAICS codes: 32211 (Pulp Mills)

Number of full-time employees: 300

Estimated Annual Sales: $60.6 Million

Relationship to other firms, parent corporation, subsidiaries, and location of off-site facilities:
Parent Corporation: International Grand Investment Corporation, located in Wilmington, DE
Sister companies under same parent corporation: St. Croix Tissue, Inc. (Baileyville, ME) and Cascade Pacific Pulp, LLC (Halsey, Oregon)

I. GENERAL FACILITY DESCRIPTION

Woodland Pulp LLC. in Baileyville, ME (Woodland Pulp or Facility) processes woodchips using chemical means to produce wood pulp used for paper manufacture. Wood pulp is bleached using chlorine dioxide before being packaged into bales and shipped to paper mills. The chlorine dioxide is manufactured onsite and is stored in two, 176,000-gallon tanks before being used in the process. The Facility also includes an onsite water treatment plant, a dedicated chemical storage warehouse, a maintenance shop, and garage.

The Facility was originally built in 1964, but Woodland Pulp purchased the site and began operating at the site in 2010. St. Croix Tissue, a sister company, was built on the same property as Woodland Pulp in 2015 to process a portion of the wood pulp from Woodland Pulp and manufacture paper products such as paper napkins, paper towels, bathroom tissue and facial tissue. Operations at the adjacent St. Croix Tissue facility utilize portions of the same supporting processes as Woodland Pulp such as the water treatment plant and shares space in the chemical storage areas located in the chemical storage warehouse and maintenance areas.

The Facility is located along the U.S.-Canada border, which is created by the St. Croix River that runs along the eastern boundary of the Facility. Residential areas surround the Facility in the North, West, and South directions with the closest home located around 400 feet from the Facility. About 0.2 miles to the southwest of the Facility is the Woodland Junior-Senior High School and about 0.4 miles to the west is the Woodland Elementary school.

The Facility has approximately 300 staff onsite, which includes full-time, part-time employees, and contractors. There are 6 labor unions, Local 27 United Steelworkers (USW), Local 295 Office and Professional Employees International Union (OPEIU), Local 1057 International Brotherhood of Electrical Workers (Electrical Workers), Local 1490 International Association of Machinists and Aerospace Workers (IAM), Local 330-3 Service Employees International Union (SEIU) oilers and steam and water plant, and Local 1121 Millwrights at the Facility. Attachment 1 is a Google Earth aerial photograph of Woodland Pulp in Baileyville, ME.

At the time of the inspection, Woodland Pulp does not consider itself a stationary source with any RMP-covered processes. In the past, the Facility reported 41,100-lbs of chlorine dioxide in their RMP submissions but deregistered in 2018 claiming the Facility reduced inventory of all regulated substances below applicable threshold quantities.

II. IN-BRIEF/OPENING CONFERENCE

The EPA inspection team including Leonard Wallace, IV, Andrew Meyer, Amy Federoff (EPA contract inspector), Tyler Evans (EPA contract air monitoring specialist), and Charles Colley of the U.S. DHS entered the Facility at approximately 10:00 a.m. The inspection team was supported by Michael Loughlin and Tiffany LaClair of Maine Department of Environmental Protection (ME DEP), Faith Staples and Darren Curtis from Maine Emergency Management Agency (MEMA), and Lisa Hanscom and Chrissy Day from Washington County Emergency Management Agency (WC EMA). The inspection team presented identification to Mr. Alex Claverie, Woodland Pulp Environmental and Technical Manager, and Inspector Wallace subsequently conducted the opening meeting and explained the reason and scope of the inspection. Inspector Wallace presented the EPCRA Notice of Inspection to Mr. Claverie, who signed as the Recipient

of the Notice. Mr. Claverie did not attempt to deny facility entry to the inspectors and did not invoke any claims of Confidential Business Information (CBI) for purposes of the inspection.

On the day of the inspection the following three unions were on strike, Local 1490 International Association of Machinists and Aerospace Workers (IAM), Local 330-3 Service Employees International Union (SEIU) oilers and steam and water plant, and Local 1121 Millwrights.

Facility Representatives:

Name	Title/Company	Phone Number	E-mail
Chandler Gallant	PSM Coordinator	207-427-4082	Chandler.gallant@igic.com
Pete White	Procurement	207-427-4087	Pete.white@igic.com
Steve Strout	Engineering	207-214-4628	Steve.strout@igic.com
John McAuliffe	Engineering Manager	506-465-9711	John.mcauliffe@igic.com
Kelly Caldwell	Environmental	207-214-2347	Kelly.caldwell@igic.com
Bill Seavey	Environmental	207-201-2347	Bill.seavey@igic.com
Rocky Smith	Bleaching Operations Supervisor	423-276-2934	Rocky.smith@igic.com
Brandon Ireland	Safety and Security	207-214-9544	Brandon.Ireland@igic.com
Scott Beal	Capella Consulting LLC	207-214-9135	Scott.beal@igic.com
Nancy James	Operations/Maintenance Coordinator	207-214-1204	Nancy.james@igic.com
Robert Gaudet	Pulp Maintenance Superintendent	207-214-4514	Robert.gaudet@igic.com
Valmond Roussel	Kraft Mill E&I Supervisor	207-214-5225	Valmond.roussel@igic.com
Alex Claverie	Environmental and Technical Manager	207-427-4047	Alex.claverie@igic.com
James Lee	Union Safety Representative	207-214-7580	James.lee@igic.com

Inspector Wallace shared the following guidance documents with facility representatives:

1. Guide to the Emergency Planning and Community Right-to-Know Act (Fall 2020)
2. EPCRA Quick Reference Fact Sheet (Fall 2020)
3. List of Lists (EPA 550-B-20-001, August 2020)
4. Small Business Resource Information Sheet (February 2020, EPA-300-F-20-002)
5. *National Response Center Oil and Chemical Spill Reporting* flyer
6. *Chemicals in Your Community* brochure (EPA 550-K-99-001, December 1999)

Inspector Wallace stated that after the opening meeting, the inspectors would do a walk-through inspection of the wood pulp manufacturing process and all associated chemical storage areas. He stated the inspection team would be taking photographs of items and areas of interest and a copy of all photographs taken would be sent to the Facility representatives after the inspection.

Additionally, the inspection team discussed details of a release that occurred, after starting up after a routine annual shut down. They facility stated that a flow meter to D1 malfunctioned, causing an excessive use of bleach being added for waste treatment. The malfunctioning meter caused an overage of bleach- 9.5 g/ml instead of .95 g/ml.

III. PHYSICAL INSPECTION

The EPA inspection team conducted a walk-through of the following areas at the Facility:

1. Administrative Building Exterior
2. Main Entrance and Security Trailer
3. Liquid Oxygen Storage Area
4. Pulp Baling and Pulp Warehouse Exterior
5. Chemical Unloading and Preparation Area
6. Bleach Plant
7. Water Treatment Plant and Surrounding Area
8. Facility Garage Exterior and Surrounding Area
9. Chemical Storeroom

Inspector Wallace took a total of 343 digital photographs during the inspection to provide reference documentation of conditions observed. The photographs are referenced throughout the document.

The following include areas of concern identified in each of the areas during the physical inspection.

Administrative Building Exterior

The administrative building at the Facility is an office building located outside of the fence line that contains the process area of Woodland Pulp. The EPA inspection team toured the perimeter of the administrative building before entering the process area of the Facility.

EPA inspectors identified the following areas of concern based on a tour of the area:

- No polychlorinated biphenyl (PCB) labeling was affixed to the electrical transformer located outside of the administration building (see Photographs P1130404 and P1130405).

Main Entrance and Security Trailer

All workers and visitors enter the process areas of Woodland Pulp by driving through a monitored gate in the fencing surrounding the Facility. Security staff observe vehicles passing through the main gate and are located in an adjacent trailer. The EPA inspection team met with onsite security staff to discuss the integrated contingency plan (ICP) used during an emergency and focused on actions taken if there were a chemical release. The EPA inspection team also viewed the current status of the chlorine sensors and alarms, which are accessible on a computer inside of the security trailer.

EPA inspectors identified the following areas of concern based on a walk-through of the area:

- No windsocks were installed at the Facility (see Photographs P1130406, P1130407, P1130408, P1130409, P1130410, P1130411, P1130414, P1130417, P1130563, P1130564, P1130565, and P1130570).

Liquid Oxygen Storage Area

Immediately inside of the main entrance to the Woodland Pulp process area is a fenced area containing the liquid oxygen storage equipment that supplies oxygen to the wood pulp process. Piping containing oxygen

from the fenced area runs across a piping support bridge into the pulp warehouse building. The liquid oxygen equipment is maintained and operated by a contractor.

EPA inspectors identified the following areas of concern based on a tour of the area:

- Vegetation was growing within 10 feet of the liquid oxygen storage tank (see Photographs P1130419, P1130420, P1130421, P1130424, P1130425, and P1130426).
- Pipe labels to indicate the contents and direction of flow for the liquid oxygen piping were either faded and illegible or missing altogether (see Photographs P1130419, P1130420, P1130421, P1130422, and P1130423).
- Jersey barriers around the liquid oxygen storage tank were not anchored into the ground (see Photographs P1130425 and P1130426).
- One of the gates in the fencing around the liquid oxygen storage was not equipped with panic hardware (see Photographs P1130419, P1130424, and P1130426).
- The fire extinguisher located nearest to the liquid oxygen storage does not have a sign to easily identify its location (see Photographs P1130431, P1130432, P1130433, and P1130434).
- Insulation on the oxygen piping was either damaged or missing altogether (see Photographs P1130435, and P1130436).

Pulp Baling and Pulp Warehouse Exterior

Dried wood pulp is shaped into bales in the pulp baling building. Then, it is stored inside of the pulp warehouse. The EPA inspection team walked between the pulp baling building and pulp warehouse exteriors and identified the following areas of concern based on a tour of the area:

- The audio/visual alarm located outside of the pulp dryer/baling building above the door had signage on them but was not prominent (see Photograph P1130413).
- Propane tanks stored in the external flammable storage cage outside of the pulp dryer building and pulp warehouse building were not marked signage to indicate whether they were empty or full (see Photographs P1130411, P1130412, and P1130438).
- The external propane storage cages outside of the pulp dryer building and pulp warehouse building were not posted with appropriate National Fire Protection Association (NFPA) signage to indicate the presence of chemical hazards (see Photographs P1130411, P1130412, and P1130438).
- Multiple doors for the pulp dryer building and pulp warehouse building were not posted with NFPA signage to indicate the presence of chemical hazards (see Photographs P1130411 and P1130438).
- Vegetation was growing within 10 feet of the propane storage cages located outside of the pulp dryer building and pulp warehouse building (see Photographs P1130412 and P1130439).

Chemical Unloading and Preparation Area

Bulk chemicals necessary for the creation of chlorine dioxide are unloaded and stored in the chemical unloading and chemical preparation areas. A rail spur in the area brings railcars of sodium chlorate while other bulk chemicals, such as sulfuric acid, caustic, and methanol, arrive by truck. Two 176,000-gallon tanks storing the on-site manufactured chlorine dioxide are also located in this area.

EPA inspectors identified the following areas of concern based on a tour of the area:

- There was a unidentified hose on the ground that originate from under the building that were not capped (see Photographs P1130441 and P1130443).
- Hoses in active use at the Facility were not labeled for the intended use and showed signs of cracking and wear (see Photographs P1130454, P1130464, and P1130471).

- Two daisy-chained hoses were used to unload defoamer from trucks at the Facility (see Photographs P1130464, P1130468, and P1130472).
- The hose used to unload sulfuric acid was active as of October 24, 2023. However, the retirement date on the hose was listed as September 2023 (see Photograph P1130455).
- The diked area around the Sulfuric Acid tank is not designed to hold a catastrophic release (see Photograph P1130459).
- Piping was used to support other piping in the sulfuric acid storage area (see Photograph P1130467).
- The North and South chlorine dioxide storage tanks, the sodium chlorate storage tank, and the sulfuric acid storage tank were not posted with appropriate NFPA signage to indicate the presence of chemical hazards (see Photographs P1130444, and P1130460).
- No pipe labels were affixed to the chlorine dioxide vent piping (on tops and behind North and south storage tanks) to indicate the contents and direction of flow (see Photograph P1130473).
- The oxidized white liquor (OWL) system did not have signage to indicate the equipment was no longer in use and the associated equipment was not locked or tagged to prevent accidental use (see Photograph P1130452).

Bleach Plant

The bleach plant is a four-story building at Woodland Pulp that contains the equipment and piping used to create chlorine dioxide. The EPA inspection team walked through the process areas of each floor of the bleach plant building. Reactants sodium chlorate, sulfuric acid, and methanol are combined in stages and complete their final mixing stage in a chlorine dioxide generator vessel that is located between floors three and four. A platform above the chlorine dioxide storage tanks is accessible using the stairwell of the bleach plant. The bleach plant building also houses the operator control room and pulp sampling lab on the fourth floor of the building. The EPA inspection team met with active operators to discuss the chlorine dioxide system, including unloading procedures and emergency procedures followed in the event of a chemical release.

EPA inspectors identified the following areas of concern based on a tour of the area:

- Piping was used to support other piping outside and inside of the bleach plant (see Photograph P1130467).
- Piping near the chlorine dioxide generator in the bleach plant appeared to have been tied to the pipe support with rope (see Photographs P1130504, P1130506 and P1130507).
- The manholes used for draining lines were open at floor-level in the bleach plant without barrier or signage to indicate an opening in the floor (see Photograph P1130492).
- Oil drums were stored without secondary containment on the fourth floor, outside of the control room (see Photographs P1130579 and P1130586).
- There was no crane inspection certification (see Photographs P1130493 and P1130494).
- Oxygen and acetylene welding gases cylinders were stored together on the same cart on the fourth floor and within 20 feet of oil products outside of the control room (see Photographs P1130581, P1130581, and P1130584).
- The team observed a white powder in the atmosphere that is settling out along the door frame, gard rail, and walkway (see Photograph P1130537).
- Incompatible acids (Sulfuric Acid) and bases (Sodium Hydroxide) were stored on the fourth floor without secondary containment or separation (see Photographs P1130549 and P1130550).
- On the day of the inspection, an active release of chlorine was identified from one of the North chlorine dioxide storage tank explosion hatches. EPA inspectors observed measured chlorine levels as high as 6.9 ppm (see Photographs P1130571 and P1130575).

- Self-contained breathing apparatus (SCBA) compressed gas cylinders were stored inside of the operator control room (see Photograph P1130603).
- Multiple doors for the bleach plant were not posted with NFPA signage to indicate the presence of chemical hazards (see Photograph P1130543).
- Hoses used in this, and other facility processes were not marked with unique identifiers to indicate that the facility operates an adequate hose maintenance program. Some of the hoses were observed to show signs of cracking (see Photographs P1130466, P1130468, P1130469, P1130471 P1130483, P1130487, P1130505, and P1130545).
- On the day of the inspection, black liquor from the process was overflowing onto the floor of the digester building and out of the building doors into wastewater collection drains (see Photographs P1130615, P1130616, P1130617, P1130618, and P1130619).
- The ferric chloride storage tank did not have signage to indicate the equipment was no longer in use and the associated equipment was not locked or tagged to prevent accidental use (see Photograph P1130611).

Water Treatment Plant and Surrounding Area

Woodland Pulp operates a water treatment plant located along the southeastern Facility boundary. The EPA inspection team walked through the main water treatment building and the secondary pump house building and viewed additional equipment on the exterior of each of those buildings. This includes observing conditions of a 12,369-gallon aqua ammonia storage tank located outside of the main water treatment building as well as three 30,000-gallon propane storage tanks located in the surrounding area.

EPA inspectors identified the following areas of concern based on a tour of the area:

- The aqua ammonia storage tank was not posted with appropriate NFPA signage to indicate the presence of chemical hazards and not clearly marked to the contents in the tank (see Photographs P1130668).
- The NFPA signage on the propane tanks are not the correct size and are not visual form all directions of approach to them (see Photographs P1130630, P1130643, P1130645, and P1130646).
- Vegetation was growing within 10 feet of the three propane storage tanks and the aqua ammonia storage tank (see Photographs P1130636, P1130637, P1130638, P1130639, P1130640, P1130641, P1130642, P1130643, and P1130644).
- Pipe labels to indicate the contents and direction of flow for the propane piping and aqua ammonia piping were either faded and illegible or missing altogether (see Photographs P1130636, P1130640, P1130643, and P1130670).
- Jersey barriers around the three propane storage tanks were not anchored into the ground (see Photographs P1130639).
- The three propane storage tanks near the water plant lacked an additional firewater monitor to extinguish fire from an opposite direction as the currently installed firewater monitor (see Photographs P1130635).
- The barrier surrounding the firewater monitor may not include a distance large enough around the firewater monitor to fit a fire suit and breathing air cylinder (see Photographs P1130653 and P1130655).
- Multiple doors for the water plant and secondary pump house were not posted with NFPA signage to indicate the presence of chemical hazards (see Photographs P1130657, P1130692, and P1130693).
- Food was stored inside the lab area of the water plant building (see Photograph P1130660).
- The flammable cabinet inside of the water plant building may not be grounded (see Photograph P1130663 and P1130664).

- A stored gas cylinder was secured with rope inside of the secondary pump house (see Photograph P1130690 and P1130691).
- Aqua ammonia piping was covered by damaged insulation that was repaired with wrapping tape around the exterior (see Photographs P1130670).

Facility Garage Exterior and Surrounding Area

At the southernmost portion of the Facility, there is a small building where the Facility stores drums of hazardous waste ready for disposal. Adjacent to the hazardous waste storage building is a diesel tank used to fuel trucks and equipment. Near the hazardous waste storage building, the EPA inspection team observed a designated raised platform used to store compressed gas tanks and, on the ground, next to the platform is multiple used oil drums. The EPA inspection team also walked around the exterior of the garage located in this area.

EPA inspectors identified the following areas of concern based on a tour of these areas:

- The diesel tank was not posted with appropriate NFPA signage to indicate the presence of chemical hazards and not clearly marked regarding the contents in the tank (see Photograph P1130698).
- The doors for the hazardous waste storage were not posted with NFPA signage to indicate the presence of chemical hazards (see Photographs P1130700, P1130701, and P1130702).
- Propane tanks stored in the external flammable storage cage outside of the sludge press building were not marked with whether they were empty or full (see Photographs P1130712).
- The external propane storage cages outside of the sludge press building were not posted with appropriate NFPA signage to indicate the presence of chemical hazards (see Photograph P1130712).
- Vegetation was growing within 10 feet of the propane storage cages (see Photographs P1130712 and P1130713).
- Compressed gas cylinders and assorted drums stored behind the sludge press building were not marked with whether they were empty or full (see Photographs P1130713, P1130714, P1130715, and P1130716).
- Multiple flammable storage cabinets located near the garage were unmarked as containing flammable materials (see Photograph P1130717).

Chemical Storeroom

The chemical storeroom is a warehouse building used for chemical storage for both Woodland Pulp and St. Croix Tissue. Chemical inventory is reported on two separate tier II forms for the two entities; however, additional information was requested for all chemical inventory inside of the storeroom. The EPA inspection team observed two main rooms in the building where one contained storage racks of drums containing lubricants and oils and the other room was mostly rows of free-standing stacked pallets and totes of process chemicals. There is also a propane tank along the exterior of the chemical storeroom.

EPA inspectors identified the following areas of concern based on a tour of the area:

- The doors for the chemical warehouse were not posted with NFPA signage to indicate the presence of chemical hazards (see Photograph P1130718).
- The chemical storage warehouse utilized a common drain, and no secondary containment was employed to separate the acid and base products (see Photographs P1130724 and P1130725).
- Multiple rows of pallets were stored directly next to each other in the chemical storage warehouse without the required separation for accessibility (see Photographs P1130724 and P1130730).

- Chemicals were stored inside of the chemical storage warehouse without a system to separate incompatible chemicals (e.g., acids and bases including nitric acid and sodium hydroxide; flammable and non-flammable products).
- Vegetation was growing within 10 feet of the propane storage tank outside of the chemical storage warehouse (see Photographs P1130743, P1130745 and P1130746).
- The propane tank outside of the chemical storage warehouse were not posted with appropriate NFPA signage to indicate the presence of chemical hazards (see Photographs P1130743 and P1130746).
- The propane storage tank outside of the chemical storage warehouse was not anchored into the ground (see Photograph P1130745).
- The propane storage tank outside of the chemical storage warehouse was not labeled to indicate the contents being stored (see Photograph P1130743 and P1130746).
- Not all the chemicals in the warehouse were reported on the Tier 2 Form.

V. OUT-BRIEF/CLOSING CONFERENCE

Inspector Wallace emailed a copy of the inspection teams' preliminary areas of concern identified during the inspection on November 15, 2023 to Mr. John McAuliffe, Woodland Pulp Engineering Manager & Reliability Excellence Facilitator. The identified Facility contact changed as EPA was notified that Mr. Claverie no longer works for Woodland Pulp. The inspection team met virtually with representatives from Woodland Pulp on November 17, 2023 at 11:00 am to review the preliminary observations, discuss additional document requests, and explain the next steps in the enforcement process.

The following preliminary areas of concern were identified during the inspection at the Facility:

1. Facility lacked windsocks at all approaches to the building to inform emergency responders and evacuating personnel of the prevailing wind direction.
2. No polychlorinated biphenyl (PCB) labeling was affixed to the electrical transformer located outside of the administration building.
3. Multiple chemical storage tanks at the Facility (the external propane storage cages outside of the pulp dryer building, pulp warehouse building, and the garage; the North and South chlorine dioxide storage tanks; the sodium chlorate storage tank; the sulfuric acid storage tank; the aqua ammonia storage tank; the diesel tank; and the propane tank outside of the chemical storage warehouse) were not posted with appropriate NFPA signage to indicate the presence of chemical hazards and not clearly marked to the contents in the tank.
4. Propane tanks stored in the external flammable storage cage outside of the pulp dryer building, pulp warehouse building, and the garage were not marked with whether they were empty or full.
5. Vegetation was growing directly next to the liquid oxygen storage tank, three propane storage tanks near the water plant, the aqua ammonia storage tank, the propane storage tank outside of the chemical storage warehouse, and propane storage cages located outside of the pulp dryer building, pulp warehouse building, and the garage.
6. Pipe labels to indicate the contents and direction of flow for the liquid oxygen piping, propane piping, natural gas piping, aqua ammonia piping, and chlorine dioxide vent piping (on tops and behind North and south storage tanks) were either faded and illegible or missing altogether.
7. Multiple doors at the Facility (pulp dryer building, pulp warehouse building, bleach plant, water plant, secondary pump house, hazardous waste storage, chemical warehouse) were not posted with NFPA signage to indicate the presence of chemical hazards.
8. Jersey barriers around the liquid oxygen storage, the three propane storage tanks near the water plant, and the propane storage tank outside of the chemical storage warehouse were not anchored into the ground.
9. The audio/visual alarm located outside of the pulp dryer/baling building was not labeled to indicate the reason for alarm.

10. The fencing around the liquid oxygen storage includes two means of egress, but only one gate was equipped with panic hardware.
11. The fire extinguisher located nearest to the liquid oxygen storage does not have a sign to easily identify its location.
12. An outdated sign indicating the presence of an emergency evacuation system visual device was located outside of the liquid oxygen storage area without a physical visual device present.
13. Insulation on the oxygen piping and multiple lengths of piping within the bleach plant was either damaged or missing altogether.
14. No crane certification observed in chlorine dioxide building's crane.
15. No hose program was observed at the Facility.
16. Hoses in active use at the Facility were not labeled for the intended use and showed signs of cracking and wear.
17. Two daisy-chained hoses were used to unload defoamer from trucks at the Facility.
18. The hose used to unload sulfuric acid was active as of October 24, 2023. However, the retirement date on the hose was listed as September 2023.
19. The oxidized white liquor (OWL) system and the ferric chloride storage tank did not have signage to indicate the equipment was no longer in use and the associated equipment was not locked or tagged to prevent accidental use.
20. Piping was used to support other piping in the sulfuric acid storage area and inside of the bleach plant.
21. Piping near the chlorine dioxide generator in the bleach plant appeared to have been tied to the pipe support with rope.
22. Piping connections and flanges throughout the bleach plant were observed to contain a buildup of pulp and byproduct.
23. The manholes used for draining lines were open at floor-level in the bleach plant without barrier or signage to indicate an opening in the floor.
24. Oil drums were stored without secondary containment on the fourth floor, outside of the control room.
25. Oxygen and acetylene welding gases cylinders were stored together on the same cart on the fourth floor and within 20 feet of oil products outside of the control room. Again, Oxygen and acetylene cylinders together outside of the pump building. Also, on the fourth floor of CL02 Building where incompatible acids and bases without secondary containment.
26. On the day of the inspection, an active release of chlorine was identified from one of the North chlorine dioxide storage tank explosion hatches. EPA inspectors observed measured chlorine levels.
27. Self-contained breathing apparatus (SCBA) compressed gas cylinders were stored inside of the operator control room.
28. On the day of the inspection, black liquor from the process was overflowing onto the floor of the digester building and out of the building doors into wastewater collection drains.
29. Contractor trucks parked onsite may no longer have active registration to legally drive on public roads when needed.
30. The three propane storage tanks near the water plant lacked an additional firewater monitor to extinguish fire from an opposite direction as the currently installed firewater monitor.
31. The barrier surrounding the firewater monitor may not include a distance large enough around the firewater monitor to fit a fire suit and breathing air cylinder.
32. Food was stored inside the lab area of the water plant building.
33. The flammable cabinet inside of the water plant building may not be grounded or bonded.
34. A stored gas cylinder was secured with rope inside of the secondary pump house.
35. Aqua ammonia piping was covered by damaged insulation that was repaired with wrapping tape around the exterior.
36. Incompatible chemicals were stored near each other inside of the hazardous waste storage building.
37. Compressed gas cylinders stored behind the garage were not marked with whether they were empty or full.

38. Multiple flammable storage cabinets located near the garage were unmarked as containing flammable materials.
39. The chemical storage warehouse utilized a common drain, and no secondary containment was employed to separate the acid and base products.
40. Multiple rows of pallets were stored directly next to each other in the chemical storage warehouse without the required separation for accessibility.
41. Chemicals were stored inside of the chemical storage warehouse without a system to separate incompatible chemicals (e.g., acids and bases) as well as flammable and non-flammable products.
42. The warehouse was storage for both Woodland Pulp LLC. and St. Croix Tissue, Inc. and not all the chemicals in the warehouse were listed on the Tier II.
43. The propane storage tank outside of the chemical storage warehouse was not anchored into the ground.
44. The propane storage tank outside of the chemical storage warehouse was not labeled to indicate the contents being stored.

VI. FACILITY COMPLIANCE STATUS AND ELEMENTS OF PROOF - EPCRA

EPCRA § 302

(1**)** Does facility have on-site, at any one time, extremely hazardous substances (EHS) at or above the TPQ? Yes, the Facility stores 100,500 lbs of aqua ammonia at 30% concentration (30,150 lbs of ammonia), 9,000 lbs of nitric acid, and 589,000 lbs of sulfuric acid.

(2) List or obtain documentation: Inspectors' observations; RY 2022 Tier II report.

(3) How was maximum quantity on-site determined or calculated? Inspectors' observations; RY 2022 Tier II report. Chemical inventory data is used to determine the amount of chemicals on site.

EPCRA § 303

(1) Facility Coordinator identified per Sec. 303 and date LEPC was notified? Unknown

EPCRA § 311

(1) Is facility required to maintain SDSs under the OSHA Hazard Communication Standard 29 CFR 1910.1200.? Yes

(2) Has the facility conducted a comprehensive audit to identify SDS chemicals on-site and to determine if 500 lb./10,000 lb./TPQ thresholds were exceeded? Unknown

(3) List of OSHA chemicals manufactured, processed, used/stored, and obtained? Yes, requested facility SDSs and chemical inventory data for all chemicals at the facility.

(4) How were the maximum amounts determined? Inspectors' observations. Chemical inventory data requested to determine the amount of stored chemicals on site.

(5) Section 311 info supplied to the:

SERC (Y/N):	Unknown
LEPC (Y/N):	Yes
Local Fire Department(Y/N):	Yes
Date:	Unknown
Chemical List:	Unknown, requested chemical inventory data

SDSs: Yes

(6) Have any new hazardous chemicals, mixtures, or substances been introduced into the facility in the last 5 years? Unknown

(7) If yes, has the facility submitted updated lists or SDSs? Unknown

EPCRA § 312 (due March 1 of year following reporting calendar year)

(1) Was Tier II form submitted for all required chemicals? Unknown. Chemical inventory data requested to confirm most recent tier II submission includes all required chemicals.

(2) What procedures are used to update Section 312 information for annual submittal and to ensure additional or new chemical data is submitted within 90 days? Unknown.

(3) Was facility aware of annual reporting requirements under Section 312? Yes.

(4) Had the facility completed and signed a list of all reportable chemicals on site on date of the inspection? No, chemical inventory data requested to review post-inspection.

(5) Table of EPCRA 312 Reportable Substances:

CAS #	Chemical	Approx. Max. Wt. on Site (Lbs.)	TPQ (Lbs.)	Approx. Ratio (Actual/TPQ)
7664-41-7	Ammonia	30,150	500	60
1310-73-2	Cyclohexylamine	6,060	10,000	0.6
7697-37-2	Nitric Acid	9,000	1,000	9
7664-93-9	Sulfuric Acid	589,000	1,000	589

Source: RY 2022 EPCRA Tier II Report

VII. ENFORCEMENT HISTORY

A search of EPA's ECHO database found a recent CWA violation at the Woodland Pulp facility for releasing amounts of total copper in their water effluent above their average limit from April-June 2023. This violation is listed as a Significant/Category 1 Noncompliance. Of the 12 quarters shown on ECHO, all 12 quarters list that a violation was identified under the CWA, but most are just listed as a reportable noncompliance. The only other Significant/Category 1 Noncompliance listed occurred between July-September 2021 and records that Woodland Pulp was over their average effluent limits for total zinc. ECHO lists no violations identified under CAA or RCRA.

VIII. ENVIRONMENTAL JUSTICE

The EJSCREEN data indicate that Woodland Pulp is located in an area of Environmental Justice (EJ) Supplemental Indexes State 4 are above the 90th percentile.

Attachment 1

Google Earth Image of Woodland Pulp in Baileyville, ME