

DATE PREPARED: November 4, 2022 DOCKET: TG-220243-220215 REQUESTER: Basin Disposal, Inc.	WITNESS: Brian Wilhelm Skyler Rachford Kurt Thorne Responder: Packaging Corporation of America and Skyler Rachford
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DATA REQUEST NO. 14:

Regarding the prefiled testimony of Skyler Rachford in Exhibit No. 01T [sic], on page 23, stating “BDI failed to recognize the problems and come up with solutions,” describe every solution that PCA proposed to BDI for changes to PCA’s process of removing OCC Rejects from its building, sufficiently drying it, and transporting it for disposal. If PCA did not propose any such solutions, please admit that it did not propose solutions to Basin Disposal.

RESPONSE:

PCA is a large manufacturer of linerboard and boxes. PCA is not in the business of managing and hauling waste for disposal. That is BDI’s business. On several occasions, PCA asked BDI for their ideas on how best to manage and dispose of the Rejects. BDI resisted in providing specific ideas to PCA. PCA presented multiple options to BDI for review and consideration, on multiple occasions, including the following;

- (1) Loading the OCC Rejects in the back of the building;
- (2) Using a conveyor belt truck for hauling the OCC Rejects;
- (3) Building a bunker in the back of the building;
- (4) Using railcars to load and transport rejects; and
- (5) Using compactor roll-off boxes.

See Exh.-BW-01T, p. 8, 9.

See also PCA’s Response to BDI’s Data Request No. 6 and No. 7.

PCA reserves the right to supplement or amend its response.