DOCKET: TG-220243-220215 REQUESTER: Basin Disposal, Inc.	Skyler Rachford Responder: Packaging Corporation of America and Skyler Rachford

DATA REQUEST NO. 6:

Regarding the prefiled testimony of Skyler Rachford in Exhibit No. 01T [sic] on page 3, stating "*As Assistant Superintendent, my key responsibility is to assist in the overall operation of the of the OCC Plant, which includes some of the following duties: Identifying and troubleshooting process issues; optimizing plant production...* for the period of January 1, 2020 to present, produce all records relating to efforts made by PCA, including without limitation by Skyler Rachford individually, to establish a process for drying OCC Rejects at PCA's Facility so that they could be loaded when sufficiently dry to permit safe transportation.

RESPONSE:

No documents responsive to this request are believed to exist. PCA has made some adjustments to the OCC process after initiation to reduce water content but these measures have not significantly changed the water content of the OCC Rejects. The OCC Plant operation is very wet process using approximately 14,490,000 million gallons of water per day. See Exh.-SR-01T, p. 4.

On April 27, 2020, PCA modified its process for the Junk Tower/Grapple Claw to reduce the moisture content in this OCC reject waste stream. In the beginning phases of operation, the Rejects from the Junk Tower, which are removed by the Grapple claw contained a higher moisture content The Junk Tower is attached to the Pulper and is designed to remove the heavy Rejects. The Grapple claw reaches into the Junk Tower and grabs the heavy Rejects. At start-up, the Grapple claw was set to drip-dry the Rejects for 1 minute before being dropped into the hopper. From the hopper, the Rejects are sent to a compactor, then the Sebright press. By April 27, 2020 PCA modified this process. The automatic controls for the Grapple were changed to allow the Rejects to drip dry for 6 minutes instead of 1 minutes. This process change reduced the moisture content in this OCC Reject waste stream.

In May 2022, PCA also modified the design and operation of the effluent Sidehill screens. Sidehill screens are designed to separate the solids from the water. The water is either reused in the Plant/Mill or sent to the Mill's effluent treatment plant. In the beginning, the separated solids were sent to the Rejects hopper, then compactor, then Sebright press. This Reject stream varied hin moisture but could be very wet. By May 26, 2022, PCA changed the design of the Sidehill screens and hard-piped all the removed solids back to the Pulper . Under normal operating conditions, this eliminated the need to disposal of this waste stream. In upset conditions, the effluent Sidehill screen Rejects often need disposal.

Both these changes were completed prior to July 2020. While these modifications reduced the moisture content of the Rejects, the OCC Plant operation is very wet process using

approximately 14,490,000 million gallons of water per day. See Exh.-SR-01T, p. 4. It is normal to have process upsets and shut-down events which can impact the moisture content of the Rejects significantly. It is important to have the resources capable of responding and handling the waste streams when these events occur.