

U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303
Water Compliance Inspection Report

FACILITY DATA

NPDES ID: MSR108784	Effective Date: 10/11/2022 (modified 03/15/2023 for Phase II)	Expiration Date: 01/31/2027
Facility Name: Gloster Forest Products Mill Construction, Phase II		SIC Code: Construction
Address: 700 E Railroad Ave / Gloster, MS		
On-Site Representative: Trevor Cerenzi Construction Manager, Bid Group Trevor.Cerenzi@bidgroup.ca (843) 560-1993		Responsible Official: Mr. Cerenzi, Bid Group Permittee: Gloster Forest Products William J. Van Devender, Jr., President

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 9:00am 03/06/2024	Exit Date/Time: 12:30pm 03/06/2024
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NAMES OF STATE INSPECTORS

MDEQ: Yang Li & Thomas Schaub
EPA LSASD: Chris McHugh & Asher Sampong

AREAS EVALUATED DURING INSPECTION (Check those areas evaluated)

X	Permit	X	Self-Compliance Program		Pretreatment
X	Records		Compliance Schedule	X	Pollution Prevention
X	Facility Site Review		Laboratory	X	Storm Water
X	Effluent/ Receiving Waters		Operations & Maintenance		Combined Sewer Overflow
	Flow Measurement		Sludge Handling/ Disposal		Sanitary Sewer Overflow

INSPECTION SUMMARY

Project is the construction of a sawmill complex, permitted under MDEQ's Large Construction General Permit. It is currently in Phase II. MDEQ previously took enforcement action against the site in 2023, with an NOV sent in 02/2023 and the formal action settled in 03/2023. The area experienced rain events on the days preceding the inspection.

INSPECTOR SIGNATURE

OFFICE/PHONE NUMBER

CELINA RUSSO  Digitally signed by CELINA RUSSO Date: 2024.04.30 14:27:53 -04'00'	USEPA Region 4/ECAD-WEB-WWES 404-562-9804
Celina Russo, Environmental Engineer	
JEREMY JUDD  Digitally signed by JEREMY JUDD Date: 2024.05.02 17:29:28 -04'00'	USEPA Region 4/ECAD-WEB-WWES 404-562-9505
Jeremy Judd, Environmental Engineer	
AHMAD DROMGOOLE  Digitally signed by AHMAD DROMGOOLE Date: 2024.05.03 15:41:14 -04'00'	USEPA Region 4/ECAD-WEB-WWES 404-562-9212
Ahmad Dromgoole, Section Chief Waterways and Wetlands Enforcement Section	

NPDES Construction Stormwater Worksheet (MS Large CGP)

1. FACILITY LOCATION INFORMATION					
GPS Coordinates	Latitude	31 11 20	Longitude	91 01 40	
Receiving Water(s)	UT of Little Beaver Creek		Weather Conditions	Sunny, warm	
Total site area acres & disturbed acres	64 (NOI) 91 (03/24 NOI)	Construction Start Date	2022; Phase II: 03/2023	Construction End Date	~July 2024
Email on NOI	william@claw-forestry.com	Date of NOI	01/13/2022	Discharge to 303(d) listed or TMDL waters	No

2. STORMWATER POLLUTION PREVENTION PLAN (SWPPP) BASIC INFORMATION			
PLAN TOPICS	YES	NO	N/E
SWPPP on site? S-1 (3)	X		
SWPPP modified or updated to current conditions? S-2 <i>The SWPPP provided onsite was dated October 2022, and was more specific to Phase I activities. Plans were originally dated February 2023.</i>		X	
SWPPP has required BMPs? ACT5 T-5	X		
SWPPP has site description? <i>Project is the construction of a sawmill complex.</i>	X		
Site map ACT5 T-13 Includes: boundaries; contours; north arrow; drainage pattern arrows; receiving water; storm drain inlets/MS4; all E/S controls; post-constr controls; housekeeping locations; buffer zones	X		
Initial BMPs installed prior to conducting clearing and grading	X		
SWPPP addresses required BMPs ACT5 T-7 T-7 (A-C): Sediment Basin Design (D): Steep Slopes (E): Construction Entrances/Exits (F): Storm Drain Inlets (G): Perimeter Controls <i>Specific basin design calculations were included in the SWPPP as well as a detail for the construction entrance/exit. Unavoidable steep slopes were not anticipated. Silt fences were selected as the perimeter control.</i>	X		
Describe any post-constr. controls ACT5 T-9(4) <i>Sedimentation ponds will continue to be used after construction.</i>	X		
Procedures for housekeeping practices ACT5 T-10 <i>Designate concrete washout areas; <u>Procedures for:</u> sweeping trackout; accumulated sed. removal from CMS; waste handling</i>	X		

Inspection procedures	ACT5 T-16		
Control measures/outfalls are to be inspected after rain events or at least weekly for a minimum of four inspections per month.		X	

3. SITE DESCRIPTION AND PLAN

Project is the construction of a sawmill complex for Gloster Forest Products. The existing property included the former Georgia Pacific site. The project is divided into two phases: (1) demolition and (2) facility grading and construction. Construction is currently in Phase II, with vertical construction underway at multiple locations. Construction work currently runs 24-hours per day. According to MDEQ's online database, a "Major Modification Form for Large Construction General Permit" was received on 03/08/24 following the inspection, in which Permittee proposed a change in the footprint identified in the original NOI.

Site has three sedimentation pond systems. Pond #1 consists of three connected basins (Ponds #1, 1A, and 1B respectively). Pond #3 and its outlet structure pre-existed this construction project. According to facility personnel, the final design for the outlet structures at Outfalls 001 and 003 are still pending from the site's engineer.

A temporary ready-mix concrete plant, which is permitted separately, is located in the westernmost corner of the site. According to facility personnel, the goal is to complete concrete needs so that the plant can be removed by the end of April 2024. This area will then be re-graded into a swale which will convey runoff into the rest of the site's existing drainage plan.

4. RECORD REVIEW

RECORD REVIEW	YES	NO	N/E
Representative on-site	X		
Records retained for 3 yrs and readily available ACT9 R-1 Facility maintains a rain gauge onsite as well as daily rainfall records dating back to last February.	X		
Maintenance and Weekly Inspections ACT 5 T-16 Required stormwater inspections are handled by Dungan Engineering (contact: H. Steve Smith, Project Engineer, hssmith@dunganeng.com). The inspection reports incorporated the tracking of corrective actions. The most recent reports were dated: 02/22/2024, 02/14/2024, and 02/02/2024. Onsite inspection records began on 02/06/2023.	X		
Staff Training Records ACT5 T-20/21 According to facility personnel, any training records would be retained by Dungan Engineering, since they manage and conduct the stormwater inspections. According to the Permit, members of the stormwater team who are responsible for installation/maintenance of BMPs should also be trained to understand the scope of their job duties. Further investigation may be necessary.			X
Stabilization measures initiated onsite within 14 days after construction has ceased in an area ACT5 T-4		X	

5. FIELD EVALUATION & PLAN IMPLEMENTATION

STRUCTURAL PRACTICES	CHECK BMPS LISTED IN PLAN	Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), and sediment off site in accordance with the Field Manual for Erosion and Sediment Control
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Silt Fences / Sediment Barriers	X	<i>See photo DSCN2932. Some of these silt fences installed along the southeastern site boundary may be in need of cleanout/maintenance.</i>
Storm Drain Inlet/Outlet Protection	X	<i>As shown in photo DSCN2927, silt fences were installed around the drain inlet. The inlet was also covered with a filter fabric. An additional example of installed inlet protection is shown in photo DSCN2937. The protection for these inlets was appeared to be correctly installed.</i> <i>Details should be referenced to ensure that the inlet protection, such as that shown in DSCN2926 is correctly installed according to specifications.</i> <i>The outlet of the underground drainage system, which discharges into the rock-lined conveyance upgradient of Sedimentation Pond #3, was partially obstructed by deposited sediment in and around the outlet (see photo DSCN2929).</i>
Sedimentation Ponds	X	<i>The first pond system above outfall 001 consists of three ponds. Sedimentation Basin #1B (photo DSCN2948) discharges into Sedimentation Basin #1A (photo DSCN2949) which discharges into Sedimentation Basin #1 (photos DSCN2942-2943). Pond #1A's riser structure was equipped with a skimmer. The outfall of Sedimentation Basin #1, which was surrounded by a rock filter ring, is shown in photos DSCN2945-46. According to facility personnel, the final design for this outfall (001) is still pending. Discharge from Pond #1 travels downgradient into the adjacent pond (at location shown in photo DSCN2938). This adjacent property, including the pond shown in photo DSCN2938, was acquired by the owner approximately 1-2 months ago. There was sediment deposition downstream of outfall 001 along the conveyance into this adjacent pond. See photos DSCN2940-2941. As shown in photo DSCN2938 and DSCN2939, hay bales and silt fences were installed across the conveyance near the beginning of the downstream pond. A view of the unnamed tributary on the downstream side of the adjacent pond's dam is shown in photo DSCN2957.</i> <i>Sedimentation Basin #2 is shown in photo DSCN2944. Its riser structure was also equipped with a skimmer. The outlet of Pond #2, shown in photo DSCN2936, ties into the city's existing storm drain system where it continues alongside E Frank Schuh Dr in the direction shown in photo DSCN2937 and farther downgradient in photo DSCN2954. Pond was discharging at the time of the inspection.</i> <i>Pond #3 is located in the southeastern corner of the site, at the location shown in photo DSCN2930. This pond and its outlet structure pre-exists the construction project and was previously used by Georgia-Pacific. Riprap was installed on all of the pond's slopes as part of this construction project, but no additional modifications to either the pond or its outlet structure were installed for construction. The outlet structure of Pond #3 is shown in photos DSCN2933-2934.</i>
Check Dams	X	<i>Rock check dams were installed in some of the drainage swales, including the swale on the southern boundary. See for example photo DSCN2927 and DSCN2952. Details may need to be checked to ensure that the check dams are installed according to specifications.</i>
Drainage Swales	X	<i>Multiple drainage swale systems convey runoff into one of the pond systems. See for example photos DSCN2923, DSCN2925, and DSCN2950. Slopes on some of these swales were not yet stabilized.</i>
STABILIZATION PRACTICES		

Seeding, Mulching, Vegetation, Matting, Sodding, Geotextiles	X	As shown in photo DSCN2935, parts of the site were bare, and rills have formed in various locations. Spoils are stockpiled at the location shown in photo DSCN2951. Silt fences were installed upgradient alongside the road, but the stockpile itself was not further stabilized. Facility personnel indicated that they are awaiting further instruction as the owner plans to use the spoils later during the project. Stockpile has been inactive for over 14 days.
OTHER BMP CONTROLS		
Construction Entrance & Exit Controls	X	The detail in the SWPPP calls for a geofabric lining. It is unclear whether or not the roadway shown in photo DSCN2937, which did not include trackout controls, is intended for use as a construction entrance/exit in addition to the one off Georgia Pacific Road.
Concrete truck washout pit	X	There is a temporary ready-mix batch plant in the southwestern corner of the site, which is permitted under MDEQ's multi-media ready-mix permit. It operates on an as-needed basis and was not running at the time of the inspection.
Other Practices (e.g., fueling containment, control areas for maintenance, SPCC, dust control, etc.)	X	Site has a diesel tank for fueling purposes.
Proper Storage & Control of Construction Debris & Chemicals	X	Site was generally clean and free of trash and debris. Dumpsters were not overflowing.

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

OUTFALL, STORMWATER, DISCHARGE, & RECEIVING WATER	YES	NO	DESCRIPTION
Number & location of stormwater discharge(s)/outfall(s) consistent with the Plan	X		Outfall 001 discharges into the pond shown at the location shown in photo DSCN2938. This property, including the pond, was recently acquired by the owner. Additional controls were installed downstream of outfall 001 and around this pond. It is unclear if this additional, recently acquired pond is intentionally being used as a sedimentation basin. Additional investigation and/or communication with the permitting authority may be needed to determine whether or not the SWPPP/NOI should be updated to include the adjacent pond's outlet as a permitted outfall.

Evidence of off-site accumulation of sediment observed in receiving water	X		<i>As shown in photo DSCN2955, sediment has accumulated offsite at the outfall to the roadside drainage ditch alongside E Frank Schuh Drive and immediately downstream of Pond #3. Pond #2 also ties into this drainage system, as shown in photos DSCN2936-2937. The outlet pipes into the roadside drainage ditch were partially obstructed by the accumulated sediment. The roadside ditch discharges into the conveyance, shown in photo DSCN2956, which also appeared turbid and orange in color.</i> <i>Discharge from Pond#1/Outfall 001 is conveyed downgradient into the adjacent pond (pictured in photo DSCN2938). As previously discussed, there was sediment deposition along this conveyance, the property of which was recently acquired by the owner. Photo DSCN2957 shows the unnamed tributary downstream of the adjacent pond's dam as it exits the culvert under Lower Gloster Rd / MS-33. The water leaving the adjacent pond appeared turbid and orange in color.</i>
Non-stormwater discharge observed		X	<i>None observed.</i>

Exit interview conducted with: *Trevor Cerenzi*

Preliminary findings discussed during the exit interview included:

- *Final designs for outfalls 001 and 003 are still pending.*
- *Additional stabilization may help reduce the burden on sedimentation basins.*
- *Report will be delivered via email in approximately 60 days.*

Photo Log is attached.