

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

FACILITY DATA

NPDES ID: GAIS13242

Effective Date: 06/01/2022

Expiration Date: 05/31/2027

Facility Name: American Woodmark Corporation – Jackson Operations

SIC Code: 2434

Address: 1017 S Hwy 42 / Jackson, GA

On-Site Representatives:

David Headley
Sjoerd Van Keulen, Project Manager
Steve Dyar, Maintenance Manager

Responsible Official:

David Headley
EHS Manager
dheadley@woodmark.com
(770) 775-6013 Ext.652

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 3:30pm 08/13/2024

Exit Date/Time: 5:45pm 08/13/2024

NAMES OF STATE INSPECTORS

GA EPD: Anam Mustafa, Michael Messinger, Adefola Olateru

AREAS EVALUATED DURING INSPECTION (Check those areas evaluated)

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

INSPECTION SUMMARY

Cabinets are manufactured at the company's other locations, and then assembled at this Facility.

INSPECTOR SIGNATURE

OFFICE/PHONE NUMBER

**CELINA
RUSSO**

 Digitally signed by
CELINA RUSSO
Date: 2024.09.03
09:34:16 -04'00'

Celina Russo, Environmental Engineer

USEPA Region 4/ECAD-WEB-WWES
404-562-9804

**JEREMY
JUDD**

 Digitally signed by
JEREMY JUDD
Date: 2024.09.03
09:45:24 -04'00'

Jeremy Judd, Environmental Engineer

USEPA Region 4/ECAD-WEB-WWES
404-562-9505

**AHMAD
DROMGOOLE**

 Digitally signed by
AHMAD DROMGOOLE
Date: 2024.09.16
09:58:25 -04'00'

Ahmad Dromgoole, Section Chief
Waterways and Wetlands Enforcement Section

USEPA Region 4/ECAD-WEB-WWES
404-562-9212

Sector W: NPDES Industrial Stormwater Worksheet (Georgia)

1. FACILITY LOCATION INFORMATION

GPS Coordinates	Latitude	33°17'12.15"N	Longitude	83°55'57.62"W	
Receiving Water(s) or MS4	UT of Panther Creek		Discharge to 303(d) or TMDL waters	NA	
Site Acreage	~18-acre site, mostly indoors	SIC Code	2434	Weather Condition	Sunny, warm
Date of NOI	10/2023	Email on NOI (RO)	MPitts@woodmark.com		

2. STORMWATER POLLUTION PREVENTION PLAN (SWPPP) AND SUPPORTING DOCUMENTS

PLAN TOPICS – Section 5 of Permit		YES	NO	N/E
SWPPP available on-site	Part 5.3/7.6 <i>A SWPPP binder, dated May 25, 2016 is kept onsite. An electronic copy of the SWPPP, dated October 2017, was emailed to inspectors during the inspection.</i>	X		
SWPPP Certification Signature/Date	Part 5.1.7 / Appendix B <i>No signature page for Facility representative.</i>		X	
SWPPP modified and updated to current conditions	Part 5.2.1-2	X		
Pollution Prevention Team named in SWPPP	Part 5.1.1 <i>Pollution prevention team is to include: EHS Manager, Plant Manager, and Maintenance Manager. Appendix B contains the names of individuals in those roles and more information on their responsibilities. Some of the names/contact info were out of date.</i>	X		
Employee training schedule	Part 5.1.2.2 <i>Employees are to be trained at hiring and then on an annual basis. Training is to include SWPPP contents, spill response procedures, good housekeeping, and pollution prevention.</i>	X		
Site Description	Part 5.1.3 <i>Facility assembles kitchen cabinets.</i>	X		
Site Map	Part 5.1.3.3 <i>See photo DSCN3022.</i>	X		
Summary of potential pollutant sources and particular pollutants	Part 5.1.4 <i>Metal rack material and wood pallets, parked trucks parked, and four compactors (two for solid waste, two for sawdust).</i>	X		
Description of the Control Measures	Part 5.1.5 <i>Identified structural controls include:</i> - Coverings for all trash compactors or any other pollutant source - Secondary containment - Vegetative cover in all pervious areas to prevent erosion	X		

Schedule and Procedures for Good Housekeeping	Part 2.1.2.2, 5.1.6.1a			
<i>To promote good housekeeping, the Facility shall (1) ensure equipment is working properly, (2) proper material storage practices, and (3) material inventory control to reduce waste due to overstocking and maintaining SDSs.</i>		X		
Schedule and Procedures for Preventative Maintenance	Part 5.1.6.1			
<i>Prescribed preventative maintenance includes timely inspection of stormwater management devices and facility equipment followed by prompt repairs. A more detailed schedule is not provided.</i>		X		
Contains Spill Prevention and Response Procedures	Part 5.1.6.1.c	X		
Schedule & Procedures for Monitoring	Part 5.1.6.2			
<i>SWPPP states that Facility SIC is 2434, which "falls under Sector W of the General Permit. Sector W does not require monitoring of stormwater discharges." Sector W facilities are not required to conduct benchmark monitoring. Per Part 8.W.3 of the Permit, Subsector W1, which includes SIC 2434, is subject to indicator monitoring for pH, COD, and TSS. Per 6.2.1.1 of the Permit, indicator monitoring must be conducted annually (beginning January 1, 2023) within the first two calendar quarters. The SWPPP identifies a sampling location on the site map.</i>			X	
Schedule & Procedures for <u>ROUTINE</u> Inspections	Part 5.1.6.2.d.i			
<i>Routine inspections are to be conducted quarterly by the EHS manager. A blank copy of the inspection form was provided as a template.</i>		X		
Schedule & Procedures for <u>QUARTERLY VISUAL</u> Inspections	Part 5.1.6.2.d.ii, 4.2			
<i>Samples should be collected within the first 30 minutes of discharge through the outfall. Examinations shall document color, odor, turbidity, debris, solids, etc. According to the SWPPP, Outfall 001 was not selected as the representative sampling location due to access issues. Instead, the storm drain in the southeastern corner (see photo DSCN3022) was selected because it receives the majority of runoff from the facility. A template form was provided for use.</i>		X		
Schedule & Procedures for <u>ANNUAL COMPREHENSIVE</u> Inspections	Part 5.1.6.2.d.iii, 4.3			
<i>Instructions and a template checklist were provided for use.</i>		X		

3. SITE DESCRIPTION AND SWPPP

Facility receives kitchen cabinet components (which are manufactured at other plant locations) and assembles them. Products are made to order, and all components arrive pre-finished. All production lines and support services are inside the building. The only activities exposed to stormwater are performed on the eastern side of the building near the loading/unloading bays. Storm drain inlets along the (paved) eastern side of the building drain northerly toward the tree line as shown in photo (see photo DSCN3022) before being directed into a low retention area. This retention area, when full, discharges towards the railroad. See photos DSCN3018-3020.

According to Facility personnel, they have previously had discussions with GA EPD regarding a No Exposure Exclusion (NEE), for which it was determined that this site does not currently qualify. Cabinets and their components are designed for indoor use and are currently exposed to stormwater in the open top dumpsters.

4. RECORD REVIEW

RECORD REVIEW	YES	NO	N/E
Representative on-site	X		

NOI Submitted to EPD <i>Submitted via GEOS in October 2023.</i>	Part 5.4.1	X		
Records available onsite or “readily available”	Part 5.4	X		
Records of incidents with spills, leaks, pollutant releases Including: dates and description of incident and the corrective actions <i>Facility reports no spills except for one incident with one of the sawdust compactors and a recent leak on a compressor.</i>	Part 5.4.3		X	
Records of maintenance and repairs of control measures <i>Corrective actions are tracked on the routine inspection forms.</i>	Part 5.4.4	X		
Records of employee training <i>Employee training is currently managed by an online system.</i>	Part 5.4.11	X		
Records of <u>ROUTINE</u> quarterly inspections <i>All inspections are conducted in-house by Facility personnel.</i>	Part 4.1/5.4.5	X		
Records of <u>QUARTERLY VISUAL</u> inspection of sw discharge (Collected in first 30 min of discharge; 0.1-inch storm; 72 hrs min from last rain)	Part 4.2.1.2	X		
Records of <u>ANNUAL</u> Comprehensive inspections	Part 4.3/5.4.5	X		
Records of Benchmark Sampling (annual unless exceeded) <i>Not a permit requirement for this Facility.</i>	Part 6.1.3-4/8			X
Representative Sampling <i>Indicator monitoring has not yet been conducted. If the facility wishes to perform visual sampling and monitoring at the storm drain inlet identified in the SWPPP (see photo DSCN3022) instead of at Outfall 001 for easier access, this location should first be discussed with/approved by GA EPD.</i>	App B.14.1			X
Non-stormwater certification onsite? (once/five years comprehensive e.g., dye/smoke testing) <i>Visual assessment 01/26/22.</i>	Part 5.1.4.4/	X		
Impaired Stream Segment Sampling and Requirements? <i>Not applicable for this Facility.</i>	Appendix C			X
Annual Reporting of Monitoring Data to EPD	Part 7.1		X	
Indicator Monitoring <i>Facility has not yet conducted any indicator monitoring, which was introduced as a requirement for the 2022 permit cycle.</i>			X	

5. FIELD EVALUATION & PLAN IMPLEMENTATION

Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies, and pollutants offsite
Loading/Unloading Area	<i>Everything is shipped in/out on trucks. Sawdust collected from the assembly line is loaded directly into a compactor, as shown in photo DSCN3013. Sawdust from the indoor mill is collected and loaded into a compactor at the location shown in photo DSCN3014.</i>

Outdoor Storage	<i>Metal rack material is stored outdoors as shown in photo DSCN3016. According to Facility personnel, unusable metals will be moved into the open top dumpster at the other end of the Facility for recycling. Recycling is collected approximately monthly. Cardboard is bailed and stored outside (see for example DSCN3014) while it awaits pickup for recycling.</i>
Outdoor Manufacturing/ Processing Operations	<i>None. All processes are conducted indoors.</i>
Waste Treatment/ Storage/Disposal Areas	<i>The open top dumpster shown in photo DSCN3011 is used for cabinet waste and the compactor is used for trash. Facility also utilizes open top dumpsters as shown in photos DSCN3016 and DSCN3017 for pallets from warehouse and remnants from the mill. The dumpsters were not covered.</i>
Sediment & Erosion Controls (BMPs)	<i>Unloading/loading areas are all paved. Pervious surfaces around the site are vegetated.</i>
Spills / Leaks Handling / Good Housekeeping	<i>All maintenance activities and fluids are indoors, and spill kits are kept nearby. There is one floor drain inside which, according to Facility personnel, is connected to the sanitary sewer line. The storm drain inlets, as shown in photos DSCN3012 and DSCN3015, had some debris on the grates.</i> <i>Any outdoor sawdust is swept and collected as needed (approximately a couple of times a year). Once, there was a sawdust spill due to an issue with one of the compactors. The Facility vacuumed and cleaned out the pipes of the drainage system in response.</i> <i>As shown in photo DSCN3021, there was an oil leak from one of the compressors approximately one week prior to the day of the inspection. Facility personnel stated that the leak was promptly cleaned up. Staining on the asphalt shows that the leak did not reach a storm drain.</i>

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 SWP3	X		<i>Water from the site's drainage system discharges into a retention area, as shown in photo DSCN3022, which is identified as Outfall 001.</i>
Evidence of off-site accumulation of pollutants observed in receiving water		X	<i>None observed.</i>
Non-stormwater discharge observed		X	<i>None observed.</i>

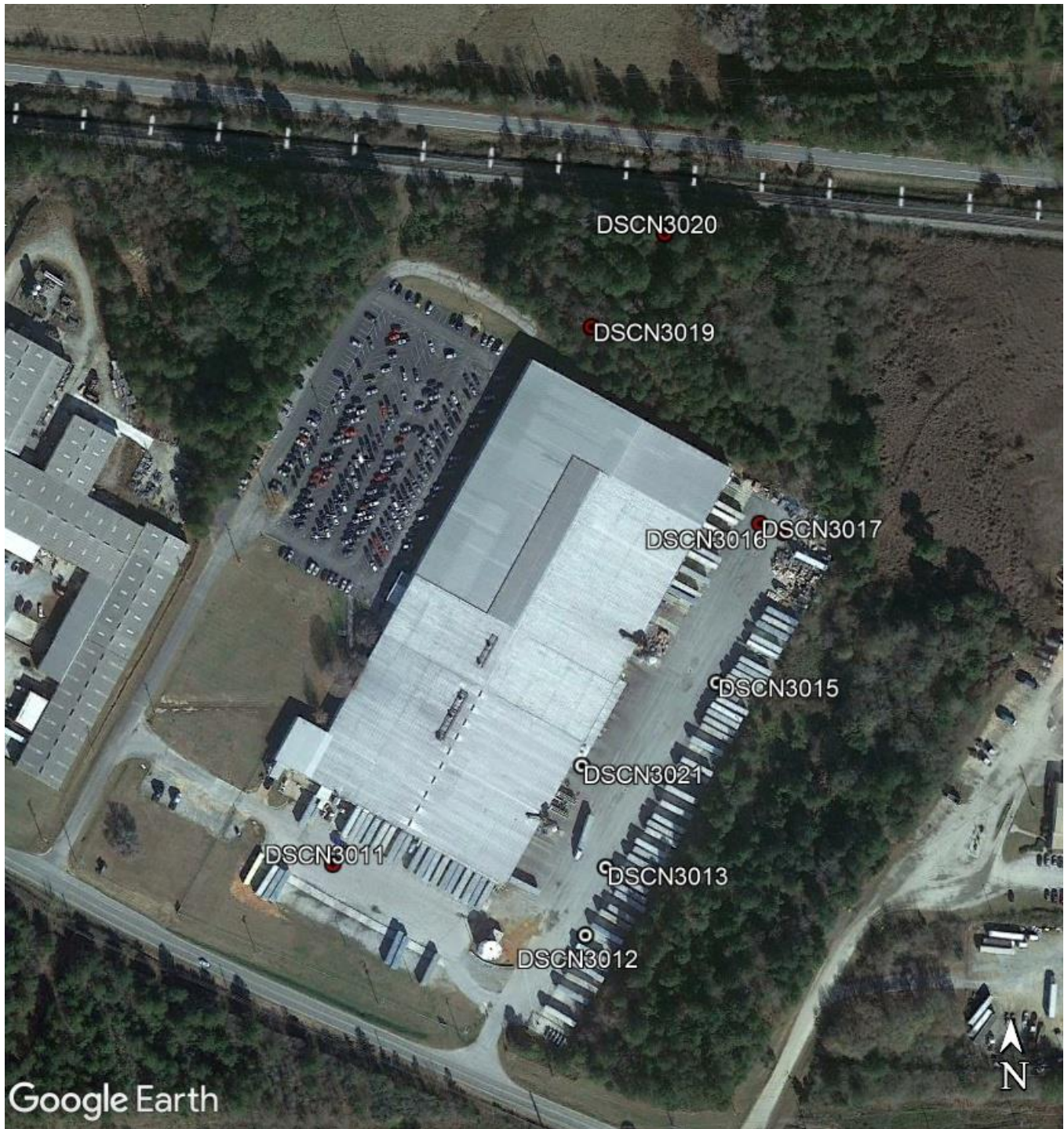
Exit interview conducted with: *David Headley*

Preliminary findings discussed during the exit interview included:

- *Dumpsters should either be covered or otherwise managed using an equivalent BMP.*
- *Maintenance activities/corrective actions, such as when the Facility cleaned out of the storm drain system after a sawdust spill, should also be tracked or recorded.*
- *An electronic copy of the SWPPP was emailed to inspectors during the inspection.*

Photo Log is attached.

American Woodmark Corporation – Jackson Operations
Stormwater CEI – August 13, 2024



Overview Map
Imagery Date: 12/2022

Note: Due to camera error, GPS locations were not recorded for each photograph. GPS locations were approximated for the photos represented by red icons on the above map. White icons indicate photo locations sourced from the camera.



Attributes	
Description	View of the loading area on the south side of the building. The open top dumpster is used for cabinet waste, and the compactor is used for solid trash.
Time Stamp	03:46:18 PM
Date Stamp	08/13/2024



Attributes	
Description	Location of a storm drain inlet. Water drains northerly (approximately towards photographer's right). Tower visible in the background stores water for emergency fire suppression purposes.
Time Stamp	03:49:08 PM
Date Stamp	08/13/2024



Attributes	
Description	Sawdust collection system for the assembly line loads sawdust into a compactor and hauled offsite. There was no sawdust spillage at the time of the inspection.
Time Stamp	03:52:44 PM
Date Stamp	08/13/2024



Attributes	
Description	View of the dust collection system for the indoor mill. Sawdust is loaded into a compactor.
Time Stamp	03:56:42 PM
Date Stamp	08/13/2024



Attributes	
Description	View of a storm drain inlet on the eastern side of the building. Debris had accumulated on the grate and was in need of cleaning. Water flows opposite of camera direction. Trailers are stored in the yard here.
Time Stamp	03:58:46 PM
Date Stamp	08/13/2024



Attributes	
Description	View of outdoor storage area. Metals are used for rack work. Waste rack metals will be loaded into the dumpster at the front of the facility for recycling. Recycling pick up is about once per month. See also photo DSCN3017.
Time Stamp	04:04:18 PM
Date Stamp	08/13/2024



Attributes	
Description	The two open top dumpsters on this end of the Facility contain miscellaneous wood debris including pallets from the warehouse and remnants from the mill.
Time Stamp	04:05:26 PM
Date Stamp	08/13/2024



Attributes	
Description	Looking downgradient. Water from the storm drain system on the eastern side of the building discharges in the direction shown into this retention area.
Time Stamp	04:12:26 PM
Date Stamp	08/13/2024



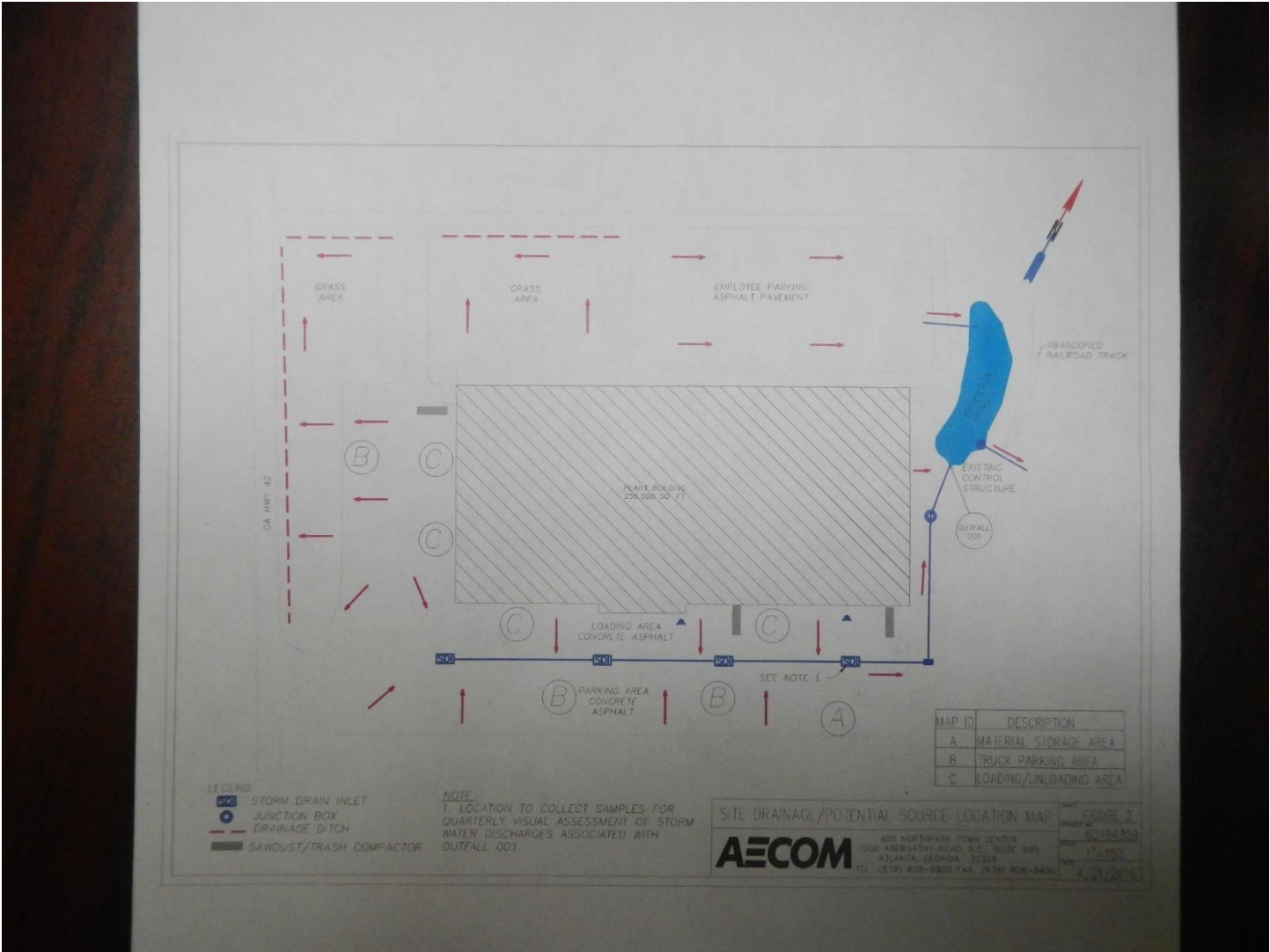
Attributes	
Description	Looking downgradient. Once water in the low retention area reaches a certain height, it discharges through the outlet structure and towards the railroad tracks, in the direction shown in photo DSCN3020.
Time Stamp	04:15:42 PM
Date Stamp	08/13/2024



Attributes	
Description	Looking downgradient. Water from the retention area behind the parking lot discharges through the outlet structure and continues towards the railroad, in the direction shown here.
Time Stamp	04:19:42 PM
Date Stamp	08/13/2024



Attributes	
Description	There was a recent oil leak on one of the Facility’s compressors, which Facility personnel stated was cleaned up. Based on the residual staining on the asphalt, the leak did not reach a storm drain inlet.
Time Stamp	04:34:30 PM
Date Stamp	08/13/2024



Attributes	
Description	View of the site map from the Facility's SWPPP
Time Stamp	04:51:32 PM
Date Stamp	08/13/2024