



NPDES Compliance Inspection Report

**Ultimate RB, Inc.
McMinnville, Oregon**

Permit #: ORR237043

Inspection Date: December 14, 2021

Prepared by:

Raymond Andrews
U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Field, Data & Drinking Water Enforcement Section

Signature/Date:

Supervisor Signature/Date:

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(All details in this report were obtained through conversations with Mr. Tim Voyles, Plant Manager, Ms. Aubree Minten, Environmental Manager, and Mr. Michael Simpson, Environmental Health & Safety Manager, from observations made during the inspection, and from review of facility documents.)

I. Facility Information

Facility Name: Ultimate RB, Inc.

Facility Owner/Operator: Carlisle Construction Materials LLC

Physical Address: 904 NE 10th Avenue
McMinnville, Oregon 97128
Yamhill County

Lat/Long: 45.21424, -123.18940

Mailing Address: 904 NE 10th Avenue
McMinnville, Oregon 97128

NAICS Code: 326299 (All Other Rubber Product Manufacturing)

SIC Code: 3069 (Fabricated Rubber Products, n.e.c.)

Facility Contacts: Tim Voyles
Plant Manager
Office Phone: 503-472-4691
tim.voyles@carlisleccm.com

Aubree Minten
Environmental Manager
Office Phone: 503-583-0070
Email: aubrey.minten@carlisleccm.com

Michael Simpson
Environmental Health & Safety Manager
Office Phone: 503-472-4691
michael.simpson@carlisleccm.com

Permit Number: ORR237043

Receiving Water: South Yamhill River

II. Inspection Information

Inspection Date: December 14, 2021

Inspector: Raymond Andrews, Inspector
EPA Region 10, ECAD /FDDWES
Phone: 206-553-4252

Arrival Time: 9:00 AM

Departure Time: 2:50 PM

Weather: Sunny, 34°F

Purpose: To determine facility compliance with the Oregon 1200-Z General National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act.

III. Permit Information

Ultimate RB, Inc. (“Facility”) is permitted under the Oregon 1200-Z National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater Discharge Permit (“Permit”). The Facility’s current permit, NPDES permit # ORR237043, became effective on July 1, 2021, and will expire on June 30, 2026. The facility is permitted under Sector Y (Rubber, Miscellaneous Plastic Products, And Miscellaneous Manufacturing Industries) of the permit.

IV. Background

RB Rubber Products, located at 904 NE 10th Avenue in McMinnville, Oregon is owned and operated by Carlisle Construction Materials LLC.

The facility was last inspected in 2019 by the Oregon Department of Environmental Quality (ODEQ). The ODEQ inspection had no major findings.

The facility has never been issued a compliance order or penalty for industrial stormwater violations.

On December 18, 2020, ODEQ issued a Warning Letter to the facility for failure to submit a Tier I Corrective Action Report for exceeding the benchmark for total iron at Monitoring Location 001 on December 11, 2019.

V. Inspection Chronology

This was an announced inspection. On December 6, 2021, I emailed Ms. Aubree Minten, Environmental Manager , and told her I would be conducting an industrial stormwater compliance inspection of the Ultimate RB facility in McMinnville, Oregon during the week of December 13th.

I conducted an opening conference, which included an interview of Mr. Tim Voyles, Plant Manager, Mr. Michael Simpson, Environmental Health and Safety Manager, and Ms. Minten followed by a records review, a site inspection, and a closing conference.

VI. Opening Conference

I arrived at the facility at 9:00 am. I presented my credentials to Mr. Voyles, Mr. Simpson, and Ms. Minten. I gave Ms. Minten a copy of EPA's Small Business Information Resource Sheet.

I explained the purpose of the inspection was to determine compliance with the Oregon Department of Environmental Quality's (ODEQ) 1200-Z permit and the Clean Water Act (CWA).

The facility has been in operation at its current location since 1985. It operates 24-hours a day, 7-days a week. Administrative business hours are Monday through Friday from 7:00 am until 4:00 pm. The facility has approximately 75 full time employees.

Per the facility's Stormwater Pollution Control Plan (SWPCP), the site covers approximately 3.25-acres. The site is generally flat but is graded so stormwater flows to catch basin. Most of the site is paved. Approximately 42% of the area is covered by buildings, 57% is impervious and covered with asphalt, and 1% is pervious, which includes an approximately 2,300 square-foot area northwest of Building A and peripheral landscaping along the northern, eastern, and southern boundaries. About half of the stormwater that falls on the site sheet flows to catch basins where it is collected and discharged to the South Yamhill River, which lies 3,000 feet to the south of the facility. The remaining stormwater flows to the street and enters the City's storm drains, which also drains to the South Yamhill River.

According to usclimatedata.com, McMinnville, Oregon, receives an approximate average annual rainfall of 39.67 inches. December is the wettest month with an approximate average 6.86 inches of rainfall, while August is the driest month with an approximate average rainfall of 0.45 inches.

The facility's primary operation is the manufacture of rubber products such as horse stall mats, rolled rubber flooring, truck bed liners, etc., from recycled tires and tire treads. Crumb rubber is received as a raw material and typically stored under cover on site in totes. The rubber goes through a conversion process that may include: drying, mixing with polyurethane, pressing, and forming.

Finished products are packaged and stored until shipment to customers. In addition to the production of rubber products, the facility conducts equipment maintenance, and commercial sales of items used in the installation of rubber products, e.g., adhesives, cleaners, and deodorizers.

The facility maintains a fleet of propane-fueled forklifts and biodiesel-powered front-end loaders for moving materials around the site.

The facility can be divided into four primary departments: Mills, Main Press Matting Line, Log Press, and Molding. Industrial activities are conducted in the production building and have no exposure to stormwater.

The raw material, and products in various stages of completion, have the potential to be exposed to stormwater because they are stored, transported, and loaded for shipment outdoors.

Crumb rubber and polyurethane are stored outside either in bags or under cover.

VII. Laboratory Inspection

The facility has statewide benchmarks, and an impaired pollutant, monitoring requirements. The statewide benchmark parameters are pH, total suspended solids (TSS), total copper (Cu), total lead (Pb), and total zinc (Zn). The impaired pollutant monitoring parameter is total iron (Fe).

When the new iteration of the Oregon 1200-Z permit became effective, all monitoring waivers expired. No new monitoring waivers will be approved until the facility has conducted four quarters of sampling under the new permit requirements.

The facility conducts pH analysis in-house with a pH meter. Ms. Minten said the facility calibrates the meter according to the operator's manual instructions, which require calibration once per month. **Photo 1** shows an example pH Calibration Log page. **Photo 2** shows an example Stormwater pH Sampling Form.

Total suspended solids (TSS), total copper (Cu), total lead (Pb), total zinc (Zn), and total iron (Fe) are analyzed by:

Apex Laboratories, LLC
6700 Southwest Sandberg Street
Tigard, Oregon 97223
(503) 718-2323

VIII. File Review

The Oregon 1200-Z permit requires documentation be retained for a minimum of three years.

I reviewed the following records and documents:

- Stormwater Pollution Control Plan (SWPCP) – updated August 25, 2021
- SWPCP Site Maps
- Permit Reissuance Letter – dated June 16, 2021
- Monthly Facility Inspection Reports – January 2019 through December 2021
- ODEQ Warning Letter – dated December 18, 2020
- Discharge Monitoring Reports (DMRs) – 1Q 2019 – 4Q 2021
- Chain of Custody Documents (CoCs) – 1Q 2019 – 4Q 2021
- Annual Employee Training Records – 2019 through 2021

Any deficiencies in the documents are annotated in the Areas of Concern, below in Part X of this report.

IX. Site Inspection

Attachment A contains an aerial map, provided by Google Maps, and a site diagram map provided by the facility. **Attachment B** contains photos used in this inspection report and a complete photo log.

Following the records review, Mr. Simpson and Ms. Minten took me on a tour of the site.

We exited the office. To the south was two of the production buildings, Building C on the western side and Building B to the eastern side. I observed totes of raw material, rubber, lined up in front of the production buildings (**Photo 3**). Adjacent to the office were pallets of finished product that were packaged and staged awaiting ship-out (**Photo 4**).

The pavement near the office sloped north and slightly east to facilitate stormwater flow to Monitoring Location 002, ML002, at the property's edge. Stormwater samples are collected through sheet flow prior to the stormwater leaving the property and entering the City's storm drain at the edge of North 10th Avenue.

From the street, we headed south to the Quonset Hut that houses containers of urethane (**Photos 5 & 6**). The Quonset Hut has a spill containment berm at the entrance (**Photo 7**) to prevent spills from escaping and stormwater from entering.

We walked south to the end of the production buildings. As we came to the end of the building, I observed a large pile of crumb rubber outside the building. The pile was uncovered and was fully exposed to the elements (**Photo 8**). Mr. Simpson said the pile of rubber was an unusual, one-time occurrence. He also said the pile represented about one week of rubber necessary for production.

We continued walking south toward Monitoring Location 001, ML001. As we walked, I observed a catch basin with a sodium ion filter (**Photo 9**). Per Mr. Simpson, the facility has two of these catch basins on the southern end of the property. He also said that they are cleaned out once a month by the manufacturer and tested to see how well they are working.

We ended the site tour by proceeding slightly east to ML001. At the ML001, Mr. Simpson pulled the manhole cover so I could take a look inside. The manhole has three lines bringing stormwater from the facility's catch basins and a single line which leads to the discharge into the South Yamhill River (**Photo 10**). The facility collects grab samples from the single line after the three stormwater streams co-mingle.

X. Areas of Concern

At the time of inspection, I found the following areas of concern:

A. Site Map

Schedule A.10.b.i.8 of the Permit states the SWPCP site map must contain "areas used for outdoor manufacturing, treatment, storage, or disposal of significant materials."

At the time of inspection, I observed a large pile of crumb rubber stored outside of a production building. This piled material was not identified on the site map.

B. SWPCP

Schedule A.10.b.ii of the Permit states the SWPCP must contain "a description of industrial activities conducted at the site and significant materials stored, used, treated or disposed of in a manner which exposes those activities or materials to stormwater. Include in the description the methods of storage, usage, treatment or disposal."

At the time of inspection, I observed a large pile of crumb rubber stored outside of a production building. As shown in Photo 8, the rubber had no protection against exposure to stormwater. The rubber pile was not addressed in the SWPCP.

C. Monitoring

Schedule B.7.c of the Permit states “Each discharge point must be monitored unless:

- i. Discharge point serves an area without exposure of stormwater to industrial activities.
- ii. Discharge point has effluent that is substantially similar to the effluent(s) of a monitored discharge point and the same BMPs are implemented and maintained at the substantially similar discharge points or drainage areas that lead to the discharge points. Substantially similar effluent(s) are discharges from drainage areas serving comparable activities where the discharges are expected to be similar in composition. The determination of substantial similarity of effluent(s) must be based on past monitoring data or an analysis supporting that the discharge points are substantially similar. The supporting data or analysis must be included in the SWPCP. This provision does not apply to discharge point(s) subject to a numeric effluent limit.
- iii. Discharge points from approved mass reduction measures that reduced the mass of pollutants at or above DEQ-approved design storm capacity. For mass reduction measures installed during previous permit cycles, the permit registrant must comply with Schedule A.6.”

Upon review of the SWPCP, the SWPCP map, and the DMRs, I found two Monitoring Locations, ML001 and ML002, listed in the SWPCP and shown on the SWPCP map but only ML001 was on the DMRs as being monitored. I did not see any evidence to support any of the three justifications for exclusion mentioned in the Permit.

D. Monthly Inspection Reports

Schedule B.12.i of the Permit states monthly inspection reports must include, “i. The inspection date and time; ii. The name(s) of inspector(s)...and viii. Any corrective action response, source control or maintenance taken or scheduled to remedy problems found.

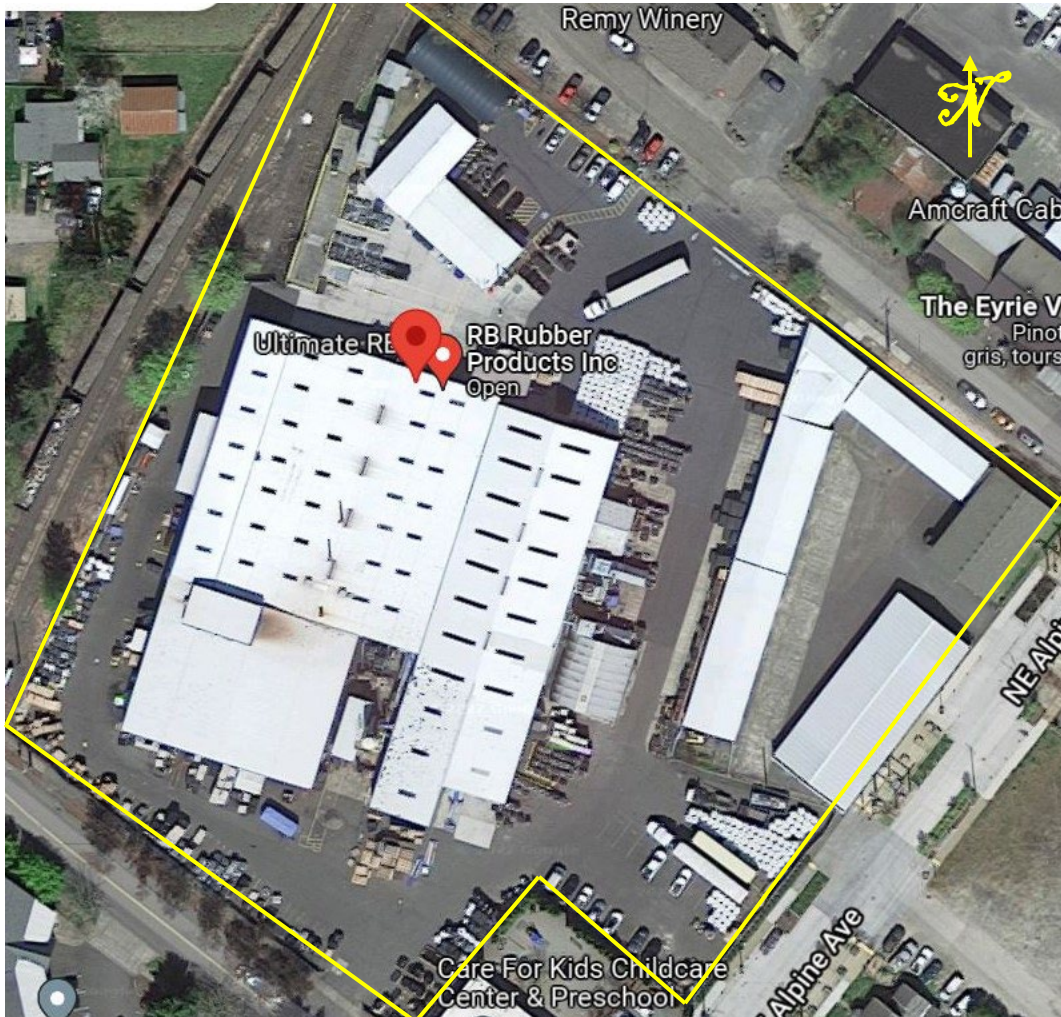
I reviewed monthly inspection reports for January 2019 through December 2021. I found from January 2019 through July 2021, the inspection reports did not include the time and date of the inspection or the name of the inspector. Further, annotation of corrective action for deficiencies found during monthly inspections was mostly absent except for corrections that could be handled on the spot, i.e., closing a dumpster lid.

XI. Closing Conference

On December 14, 2021, I held a closing conference with Mr. Voyles, Ms. Minten, and Mr. Simpson. We discussed my observations and I gave a brief overview of the post-inspection process. I thanked them for their time and assistance.

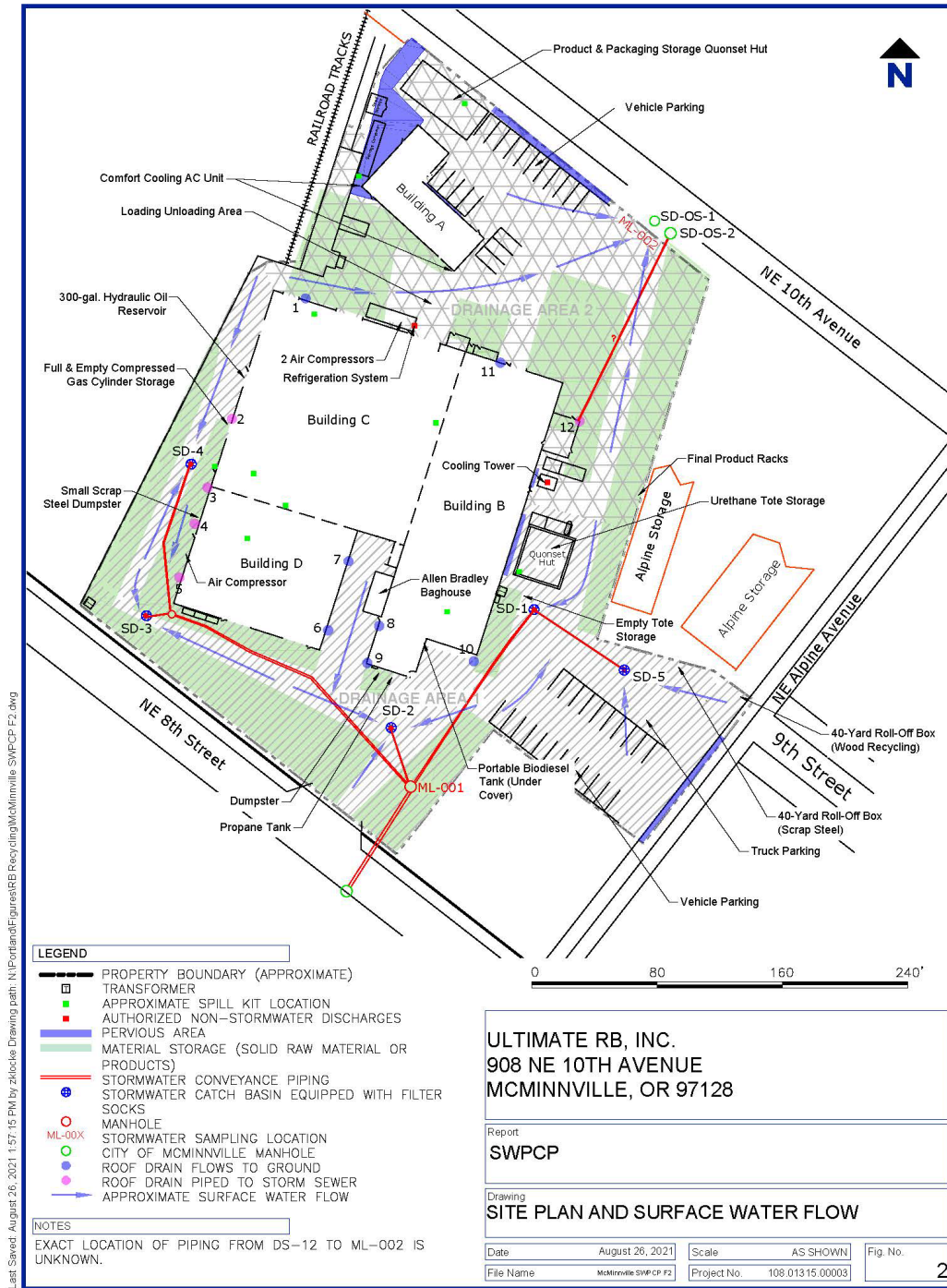
ATTACHMENT A

Aerial Site Image Provided by Google



Yellow lines denote approximate facility boundary.

Site Diagram Provided by Facility



Last Saved: August 26, 2021 1:57:15 PM by zloche Drawing path: N:\Portland\Figures\RB\Recycling\McMinnville SWPCP F2.dwg

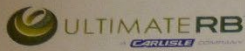
ATTACHMENT B

Inspection Photographs and Photograph Log

(Photographs taken by Ray Andrews on December 14, 2021 with a Panasonic DMC-FH25 camera)

pH Calibration Log		
Probe Information		
Manufacture: Oakton Instrumentation		Serial Number: 2552402
pH Buffer Information		
Oakton pH 4.01 Expiration Date: 05-04-22	Oakton pH 7.00 Expiration Date: 3-24-22	Oakton pH 10.01 Expiration Date: 3-05-22
Calibration Reading: 4.07 Calibration Date: 11-3-20	Calibration Reading: 7.01 Calibration Date: 11-3-20	Calibration Reading: 9.95 Calibration Date: 11-3-20
Calibration Reading: 4.05 Calibration Date: 11-17-20	Calibration Reading: 7.01 Calibration Date: 11-17-20	Calibration Reading: 9.91 Calibration Date: 11-17-20
Calibration Reading: 4.06 Calibration Date: 12-10-20	Calibration Reading: 6.99 Calibration Date: 12-10-20	Calibration Reading: 10.01 Calibration Date: 12-10-20
Calibration Reading: 7.04 Calibration Date: 12-17-20	Calibration Reading: 6.98 Calibration Date: 12-17-20	Calibration Reading: 9.92 Calibration Date: 12-17-20
Calibration Reading: 4.01 Calibration Date: 1-29-21	Calibration Reading: 6.95 Calibration Date: 1-29-21	Calibration Reading: 9.94 Calibration Date: 1-29-21
Calibration Reading: 4.02 Calibration Date: 2/25/21	Calibration Reading: 7.02 Calibration Date: 2/25/21	Calibration Reading: 9.82 Calibration Date: 2/25/21
Calibration Reading: 7.09 Calibration Date: 3/3/21	Calibration Reading: 7.00 Calibration Date: 3/3/21	Calibration Reading: 9.88 Calibration Date: 3/3/21
Calibration Reading: 4.07 Calibration Date: 4/30/21	Calibration Reading: 6.95 Calibration Date: 4/30/21	Calibration Reading: 9.87 Calibration Date: 4/30/21
Calibration Reading: 4.07 Calibration Date: 5/7/21	Calibration Reading: 6.96 Calibration Date: 5/7/21	Calibration Reading: 9.86 Calibration Date: 5/7/21
Calibration Reading: 4.09 Calibration Date: 6-9-21	Calibration Reading: 6.93 Calibration Date: 6-9-21	Calibration Reading: 9.88 Calibration Date: 6-9-21
Calibration Reading: 4.05 Calibration Date: 7/27/21	Calibration Reading: 6.92 Calibration Date: 7/27/21	Calibration Reading: 9.68 Calibration Date: 7/27/21
Calibration Reading: 4.00 Calibration Date: 8/31/21	Calibration Reading: 6.94 Calibration Date: 8/31/21	Calibration Reading: 9.6 Calibration Date: 8/31/21

Photo 1 / P1010031 – pH Calibration Log Sheet



File Number: 1

Stormwater pH Sampling Form

Probe Information	
Manufacture: Oakion Instrumentation	Serial Number: 2552402

Outfall 001	
Date sample was taken:	11/12/21
Time Sample was taken:	6:08 AM
Time pH reading was obtained:	6:12 AM
pH reading:	7.35

Outfall 002	
Date sample was taken:	11/12/21
Time Sample was taken:	5:23 AM
Time pH reading was obtained:	5:26 AM
pH reading:	8.14

Name of sampler: Michael Simpson

Signature of Sampler: [Signature]

Photo 2 / P1010032 – Stormwater pH Sampling Log



Photo 3 / P1010042 – Totes of Raw Material (rubber)



Photo 4 / P1010043 – Finished Product



Photo 5 / P1010047 – Urethane Under Cover



Photo 6 / P1010048 – Urethane Container, close-up



Photo 7 / P1010049 – Spill Containment Berm



Photo 8 / P1010050 – Ground Rubber Pile



Photo 9 / P1010053 – Catch Basin with Sodium Ion Filter

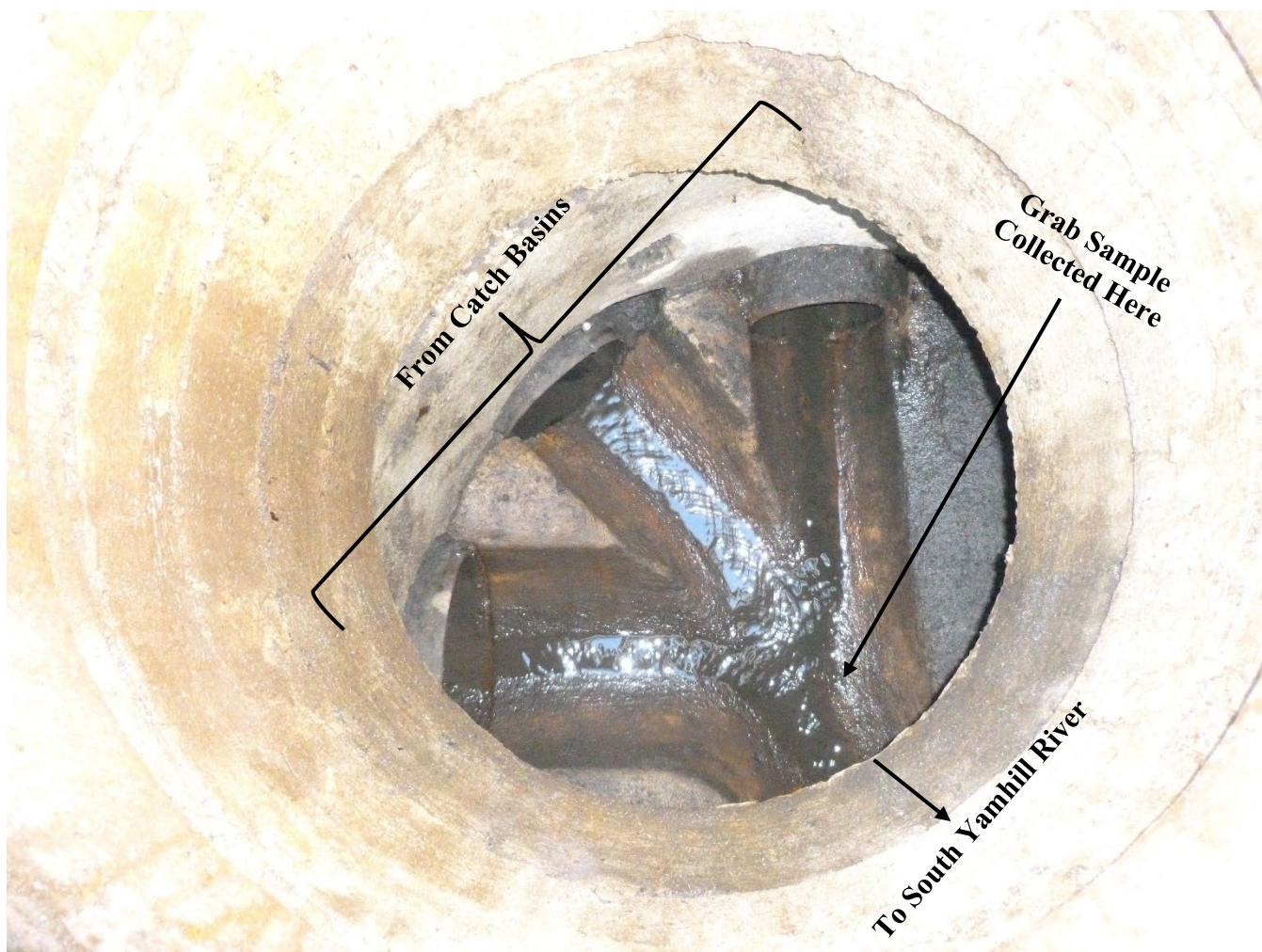


Photo 10 / P1010055 – Manhole Interior

Complete list of photographs taken during the inspection:

- P1010031 – pH Calibration Log Sheet
- P1010032 – Stormwater pH Sampling Log
- P1010033 – Chain of Custody (12/1/2021)
- P1010034 – Tier I Corrective Action Report (7/9/2021)
- P1010035 – Tier II Revised SWPCP Checklist Cover Sheet
- P1010036 – Tier II Revised SWPCP Checklist
- P1010037 – SWPCP Addendum Cover Sheet
- P1010038 – Addendum to SWPCP, page 1
- P1010039 – Addendum to SWPCP, page 2
- P1010040 – Addendum to SWPCP, page 3
- P1010041 – Addendum to SWPCP, page 4
- P1010042 – Totes of Raw Material (rubber)
- P1010043 – Finished Product
- P1010044 – Pavement Near Office Sloped to Street & Outfall 2
- P1010045 – Front Gate, Outfall 002
- P1010046 – City Stormwater Drain
- P1010047 – Urethane Under Cover
- P1010048 – Urethane Container, close-up
- P1010049 – Spill Containment Berm
- P1010050 – Ground Rubber Pile, photo 1
- P1010051 – Ground Rubber Pile, photo 2
- P1010052 – Catch Basin with Sodium Ion Filter, photo 1
- P1010053 – Catch Basin with Sodium Ion Filter, photo 2
- P1010054 – Catch Basin with Sodium Ion Filter, photo 3
- P1010055 – Manhole Interior, photo 1
- P1010056 – Manhole Interior, photo 2