

Clean Water Act (CWA) Inspection Report

Inspection Entry Date/Time	05/16/2023 10:00 AM (PT)	Announced: Yes		
Inspection Exit Date/Time	05/16/2023 12:45 PM (PT)			
Media	Water			
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial			
Type of Inspection	CEI - Compliance Evaluation Inspection			
Permittee Name	Emerald Forest Products – Plant 1			
Facility Name	Emerald Forest Products – Plant 1			
Facility Physical Address	118 Highway 99 N			
City, State, Zip Code	Eugene, Oregon 97402			
Facility GPS Coordinates	44.056208 N -123.135616 W			
Facility Owner	Emerald Forest Products, Inc.			
Mailing Address	P.O. Box 2746			
City, State, Zip Code	Eugene, Oregon 97402			
Receiving Water	Amazon Creek A3 Channel			
FRS ID	110001655566			
Permit # / ODEQ File #	ORR222065 / 10889			
SIC Code	2436 – Softwood Veneer and Plywood			
Inspection Contacts:				
Organization	Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Jon Klemesrud	Lead Inspector	Yes	Yes
City of Eugene	Zach Foster	Environmental Compliance Specialist	Yes	Yes
Emerald Forest Products – Plant 1	Doug Maples	Plant Manager	Yes	Yes
Emerald Forest Products – Plant 1	Scott Tucker	Maintenance Supervisor	No	No
Emerald Forest Products – Plant 1	Wes Cunningham	Boiler Operator / Millwright	No	No
EPA Inspector Signature/Date	JON KLEMESRUD		Digitally signed by JON KLEMESRUD Date: 2023.06.23 15:52:05 -07'00'	
	Jon Klemesrud			
Supervisor Signature/Date	PETER CONTRERAS		Digitally signed by PETER CONTRERAS Date: 2023.06.23 15:59:39 -07'00'	
	Peter Contreras, Chief FDDWES			

This inspection report is based on information supplied by conversations with Mr. Doug Maples, Mr. Scott Tucker, Mr. Wes Cunningham or direct observations made at the time of the inspection, and records and reports maintained by the permittee. This inspection report may also include information gathered from a review of EPA, State, City, and/or public records.

SECTION I – INTRODUCTION

Entry and Inspection Chronology

I was joined on the inspection by City of Eugene representative Mr. Zach Foster. To ensure staffing and availability, this inspection was announced one day prior. At approximately 10:00 AM on May 15, 2023, I called and spoke with Mr. Doug Maples, Plant Manager. I introduced myself and discussed that in coordination with ODEQ and the City of Eugene, I had been asked to conduct a routine on-site inspection at the Emerald Forest Products – Plant 1. I explained that the inspection was to assess compliance with the facility's coverage under ODEQ's Industrial Stormwater Discharge Permit (1200-Z). Mr. Maples welcomed the inspection and we agreed to begin the inspection at 10:00 AM the following day. I discussed that I would be joined on the inspection by Mr. Foster, and that the inspection would include a walk-through of the facility and a review of permit related documents.

Mr. Foster (City of Eugene) and I arrived on-site at approximately 10:00 AM on May 16, 2023 and met with Mr. Maples. We were escorted up to his office to begin the inspection. Following our initial introductions, I presented my EPA credentials and discussed the purpose/expectations of the inspection. We began the inspection with a brief discussion regarding the facility's general history and operations, including the separated stormwater capture system and the process wastewater capture system. Mr. Maples discussed that the Facility contracts with PBS Engineering and Environmental, Inc. to assist in various components of 1200-Z compliance, however, the majority of items is still handled internally by Mr. Maples, who has worked at the facility for approximately 40+ years.

The inspection consisted of an opening conference, a walk-through of stormwater impacted areas and related infrastructure, a records review, and concluded with a closing conference. During the closing conference, we discussed the walk-through observations, potential areas of concern and EPA's general inspection report/follow-up process. Portions of the records review occurred both pre- and post-inspection, as discussed in Section III of this inspection report. We were accompanied throughout the inspection by Mr. Maples. Mr. Scott Tucker (Maintenance Supervisor) and Mr. Wes Cunningham (Boiler Operator / Millwright) were present for certain portions of the walk-through.

Permit/Compliance History

Emerald Forest Products – Plant 1 is permitted to discharge to the Amazon Creek A3 Channel under ODEQ's Industrial Stormwater Discharge Permit (1200-Z). The permit tracking number assigned to the Facility is ORR222065. The Facility is also subject to the sector specific requirements identified in Schedule E of the 1200-Z Permit (Sector A - Timber Products). Acting as an Agent for ODEQ, the City of Eugene is the regulatory agency for 1200-Z permit compliance for Emerald Forest Products – Plant 1. According to the facility's Stormwater Pollution Control Plan (SWPCP), the facility was first permitted for their NPDES discharge on February 28, 1996.

According to file documentation, the last inspection for 1200-Z Permit compliance occurred on June 17, 2021, by the City of Eugene. The 2021 inspection report documented one compliance issue, failure to cover waste material (uncovered dumpsters). As a follow-up to the inspection/compliance issue, on August 5, 2021, the City of Eugene issued a Warning Letter with Opportunity to Correct, the letter included a corrective action to provide cover for all waste contained in bins or dumpsters.

On September 17, 2021, on behalf of Emerald Forest Products, Inc., PBS Engineering and Environmental, Inc. provided a follow up response (including photographs), documenting that all dumpster units were now outfitted with hard lids and all uncovered units were removed the facility.

SECTION II – OBSERVATIONS

Site Review

Emerald Forest Products – Plant 1 (hereinafter referred to as the “Facility”) is a softwood veneer/plywood manufacturing facility in Eugene, Oregon. The Facility operates within a light industrial area on approximately 9.3 acres. See **Attachment A**, Aerial Image (Google Earth) & **Attachment B**, Vicinity Map. The facility has operated at its current location since 1982. The primary industrial activities include softwood veneer drying, plywood production. Other industrial activities on-site include equipment maintenance, material delivery, product shipment, and company administration. Industrial operations that are located outside include truck and forklift fueling, loading and unloading of raw wood materials, shipping of finished plywood, loading of the chip bin, scrubber wash-water tanks, oil/water separator system, the conveyor and storage of “green” veneer. According to the SWPCP, chlorophenolic, creosote, or chromium-copper-arsenic formulations for wood surface protection and/or wood preserving are not used on-site.

Manufacturing operations currently include a natural gas-fired boiler, one steam-heated veneer dryer, one natural gas direct-heated dryer, various trim saws, five plywood presses, a glue line for resin application, areas for both raw and finished product storage, a maintenance and fabrication facility, cyclone baghouse and scrubber equipment for controlling air contaminants.

According to the SWPCP, in regard to potential stormwater contamination, “significant materials” include diesel fuel, reclaimed oil, wood chips, savings, dust and debris, glue/resin, “green” veneer, oil and grease, and transformer oil. To address the potential stormwater contamination, frequent inspections and sweeping is implemented, all catch basins in the vicinity of outdoor wood product storage are equipped with filter fabric inserts, baffles, or both. Equipment maintenance and repair is conducted indoors to prevent exposure.

In general, runoff from the 6.58 acres of impervious areas is collected by a series of catch basins that route stormwater to the City of Eugene municipal stormwater system. The sub-surface stormwater piping extends beneath West 5th Avenue and ultimately discharges to the A3 Channel of Amazon Creek. A3 Channel is included in the ODEQ “303(d)” list of water quality “impaired” water bodies. The A3 Channel is located approximately 1,200 feet to the west-southwest of the property, the main channel of Amazon Creek is approximately 3,000 feet to the south. Amazon Creek splits into two streams, one going to the west and emptying into Fern Ridge Reservoir and the other turning north and flowing to Clear Lake.

The Facility has identified five separate drainage basins (Drainage Basin #1 - #5) and three monitoring locations (Outfall #1 - #3) within their footprint, see **Attachment C**, Facility Map.

Following the opening conference and initial discussions, we left Mr. Maples’ office located on the north end of the manufacturing building and began the inspection walk-through. For the inspection walk-through we visited each drainage basin, monitoring location, and associated outdoor industrial areas. Photographs taken during the site-walk through are attached to this inspection report as **Attachment D**, Photograph Log.

Walk-Through Observations:

Location: Drainage Basin #2

Observation #: OB-01

We first walked through the interior portion of the manufacturing building and observed select areas used for process water/wastewater collection, near the veneer dryers. We exited the building and entered into Drainage Area #2, where we first observed the oil/water separator associated with the facility’s process wastewater system (**Photo 1**). For the process wastewater system, a large sump within a bermed area receives wash water from the scrubber and from within the manufacturing facility, as well as other contact wash rinsate sources used in production. Mr. Maples also referred to this outdoor sump as the “pit.” An oil skimmer operates on the surface of the sump and removed oils are deposited into a large tote and then recycled. Effluent from the system is

discharged to City of Eugene's sanitary sewer.

The primary activity observed within Drainage Basin #2 (Basin #2) was green veneer storage which occupied the majority of the area. According to the SWPCP, Basin #2 is the smallest of the five basins at approximately 37,175 square feet. Basin #2 is 100% impervious.

A single catch basin within Basin #2 serves as the monitoring location (Outfall #2) for stormwater discharges within area. The catch basin was equipped with filter fabric to collect and remove sediment and debris. According to Mr. Maples, the fabric is changed out typically twice a year, or more frequently if identified during a routine walk-through. Sweeping also occurs within the area as a best management practice (BMP).

We travelled north and observed the scrubber wash tank (**Photo 2**), we observed a small amount of water dripping down from the scrubber and ponding on the concrete surface near a vegetated/gravel area just outside of Basin #2, within Drainage Basin #1. Mr. Maples discussed that he previously unaware of the observed dripping. While still at the location, Mr. Maples called and had two individuals from the maintenance staff come and investigate the issue. Upon their arrival, the dripping was determined to be caused from a small opening of the scrubber access hatch and was repaired while on-site. No discharge to the Basin #2 catch basin was observed.

Location: Drainage Basin #1

Observation #: OB-02

We continued our walk-through north, into Drainage Basin #1 (Basin #1) which generally includes the northern portion of the Facility. According to the SWCPC, Basin #1 is 81,500 square feet and 85% pervious. Basin #1 includes roof runoff from the north end of the manufacturing facility, the boiler houses, millwright shop, electrical shed and transformer pad and chip bin. Stormwater within Basin #1 is designed to be infiltrated or evaporated.

We first walked the north/northwest perimeter and viewed the chip bin area (**Photo 3**). North of the chip bin, we observed a municipal drainage ditch. According to Mr. Maples and the SWPCP, the ditch is located within a utility easement along the property boundary, flowing east to west and eventually discharging through a constructed concrete basin to the municipal stormwater system (subsurface) along W. 5th Avenue. We observed the chip bin area to have widespread overflow of woodchips within the area. According to Mr. Maples, the area is periodically scraped with a front loader to address the overflow of woodchips that occurs during loading. We observed the municipal drainage ditch and areas of vegetative berming between the chip bin area and the ditch.

We continued the walk-through to the south and observed the "boiler houses." The facility has two boiler houses/buildings, one contains an older diesel/hog fuel boiler that has been out of service since upgrading to a natural gas boiler. One building houses the older boiler as well as other components for the newer natural gas boiler. The second house/building to the north contained the newer natural gas boiler.

At the time of inspection, we observed a water conveyance/channel off of the older diesel boiler building (**Photo 4**). The water conveyance travelled west to east from an outdoor concrete sump and then went subsurface. When asked about the source of the water during dry weather conditions, Mr. Maples was unsure and called Mr. Scott Tucker, Maintenance Supervisor and Mr. Wes Cunningham, Boiler Operator/Millwright. Both Mr. Tucker and Mr. Cunningham arrived shortly after and we walked through the boiler process flow piping, it was discussed that the excess boiler make-up water and water from the deaerator tank is routed to sanitary sewer via an indoor sump and piping, as indicated on the Facility Map (**Attachment C**). The interior sump routes to sanitary sewer. We observed a small crack in the concrete that separates the interior sump from the outdoor structure. The outdoor structure contained standing water (**Photo 5 & Photo 6**). At the time of inspection, it was unclear where the water conveyance/channel from the outdoor structure is ultimately discharged.

We then walked to the eastern portion of the municipal drainage ditch (**Photo 7**). We observed small amounts of standing water within the municipal drainage ditch and multiple inlet pipes (without flow) were observed on both sides of the ditch (**Photo 8**). A vacant lot/property is located on the eastern side of the eastern drainage ditch. Mr. Maples was not aware of any active connections to the municipal drainage ditch. We also observed a small

grate/catch basin located near the southeast corner of the electrical shed (**Photo 11**). The grate/catch basin was not listed Facility Map (**Attachment C**).

Location: Drainage Basin #5

Observation #: OB-03

We continued south into Basin #5, located within the east/southeast portion of the Facility. Basin #5 is largest of the Facility's basins, occupying 117,075 square feet and 100% impervious. Basin #5 collects stormwater that falls on the west edge of the manufacturing facility roof, north half of the finished plywood storage area, the roof drains of the maintenance shop, attached offices and resin tank building. Stormwater is from both sheet flow and the downspouts combine with surface sheet flow from the areas surrounding the maintenance shop. A total of nine catch basins collect stormwater in the basin, all combining beneath a catch basin next to the loading dock. Monitoring is conducted at this location as Outfall 3. The stormwater piping eventually converges with stormwater from Outfall #1 and #2 and flows west within the main storm system, ultimately discharging to the A3 Channel of Amazon Creek.

We observed a northern catch basin within Basin #1 (**Photo 9**). We also observed a small amount of water flowing into the eastern portion of the municipal drainage basin from a subsurface pipe (**Photo 10**). Mr. Maples wasn't aware of source of the observed water. We continued south and observed the paved areas around the metal fabrication shop within Drainage Basin #5. (**Photo 12**).

Location: Drainage Basin #3

Observation #: OB-04

The walk-through continued west as we walked through the southern portion of the manufacturing facility to view Basin #3. Basin #3 is 100% impervious and encompasses 44, 270 square feet. Basin #3 includes roof runoff from the southeast portion of the manufacturing facility and surface runoff from the south half of the west side of the manufacturing facility. The pavement slopes to a catch basin (Outfall #1) in the center of the drainage basin. The basin is fitted with filter fabric and baffles (**Photo 13**). The catch basin drains to the south, through the paved lot towards West 5th Avenue and converges with the main storm system north of the railing and is routed west, ultimately discharging to the A3 Channel of Amazon Creek.

Location: Drainage Basin #4

Observation #: OB-05

The walk-through concluded after viewing the discharge location for Basin #4. Basin #4 includes approximately 80% of the manufacturing facility roof, including the south half of the finished plywood storage are roof. Roof drains enter an 8" PVC pipe located on the south of the production building. The pipe discharges to a dead-end sump, located in the vegetated area where stormwater is either infiltrated or evaporated (**Photo 14**).

SECTION III – RECORDS REVIEW

Record: Storm Water Pollution Control Plan (SWPCP) & Employee Training Documentation

Ref #: RR-01

A copy of the Facility's SWPCP was on-site and available for review at the time of inspection. An electronic version of the SWPCP was also provided pre-inspection by City of Eugene. The SWPCP was first developed in 1996 by PBS Engineering and Environmental Inc., it's last update occurred in August 2021 (also by PBS Engineering and Environmental Inc.) to reflect the permit reissuance. The SWPCP was certified by Mr. Maples on September 13, 2021. The SWPCP included the applicable elements required/discussed within Schedule A. Part 10 of the permit. The SWPCP also included maps of the stormwater system, an employee training sheet, spill

response guidance, a monthly SWPCP inspection checklist/template, BMP maintenance log and a stormwater sample collection field form. Training was last documented on May 1, 2023, and records were kept dating back to 2012.

Record: Site Inspection Reports & BMP Maintenance Log

Ref #: RR-02

Monthly Site Inspection Reports and visual monitoring required by the permit were reviewed and discussed at the time of inspection. I reviewed reports dating back to the last compliance inspection June 2021 – current. In general, Mr. Maples or his son, Mr. Calvin Maples conducts the majority of the on-site inspections. Monthly site inspections are completed using the Facility's template (**Attachment E**). Completed inspection forms were well documented and completed on the following dates: 4/23/2023, 3/30/2023, 2/28/2023, 1/27/2023, 12/8/2022, 11/22/2022, 10/31/2022, 9/28/2022, 8/31/2022, 7/6/2022, 6/30/2022, 5/28/2022, 4/29/2022, 3/30/2022, 2/21/2022, 1/31/2022, 12/30/2021, 11/22/2021, 10/28/2021, 9/28/2021, 8/30/2021, 7/30/2021, 6/11/2021.

The facility also documents best management practices (BMP) activities using a maintenance log. The log generally included weekly/monthly entries dating back to 2013. Recent BMP maintenance activities were documented on 5/8/2023, 5/1/2023, 4/30/2023, 4/28/2023, 4/21/2023, 4/19/2023, 4/11/2023, 04/2023. Examples of BMP maintenance included sweeping of select areas and catch basin filter fabric replacements.

Record: Discharge Monitoring Data (DMR) & Laboratory Analytical Data

Ref #: RR-03

DMRs and associated stormwater monitoring data was reviewed as part of this inspection. The Facility is subject to permit and sector specific benchmark monitoring, including for total copper, total lead, total zinc, pH, TSS, COD and total iron.

The Facility currently has active monitoring waivers for all three monitoring locations (Outfall #1, #2, & #3) per Schedule B.9 of the permit for all parameters except for total iron. Waivers were granted by the City of Eugene/ODEQ in October of 2022, for all parameters and locations with the exception of pH for Outfall #1, which was granted in April of 2023. Waivers were granted after the Facility provided documentation of five consecutive sampling results below the listed benchmarks.

When reviewing sampling data since the last inspection in June of 2021, the Facility had one benchmark exceedance for pH on December 6, 2021, for Outfall #1. The reported value was 9.03 s.u. (benchmark 5.5 - 9.0 s.u.) The Facility completed a Tier 1 Correction Action Report, and the source of the exceedance was unknown.

For analytical services the Facility contracts with Analytical Laboratory Group, Inc. (ALG) in Eugene, Oregon. As a subsample, I reviewed monitoring records including chain-of-custody and laboratory reports for sampling events that occurred on January 1, 2022, and March 21, 2022, for all three outfalls.

SECTION V - AREAS OF CONCERN

Areas of Concern may not be in sequential order.

The presentation of Areas of Concern (AOC) does not constitute a formal compliance determination or violation.

AOC #1: Water Conveyance Observed Near Boiler Building

Regulation and/or Permit Requirement:

Condition 1.7.b. within the permit states: "The permit registrant must separate any piping of interior floor drains and process wastewater discharge points from the storm drainage system to prevent unpermitted

discharge of pollutants to waters of the state. Discharge from the floor drains to the stormwater drainage system is a violation of this permit."

Schedule A.10.b.i.3. within the permit states the required elements of the site map(s) to include: "conveyance and discharge structures such as piping or ditches."

Observation:

As discussed earlier in this report, during the walk-through within Drainage Basin #1 we observed a water conveyance/channel off of the older diesel boiler building (**Photo 4**). The water conveyance travelled west to east from an outdoor concrete sump and then went subsurface via piping. It was discussed that inside the older boiler building, the excess boiler make-up water and water from the deaerator tank is routed to sanitary sewer via an indoor sump and piping, as indicated on the Facility Map (**Attachment C**). The interior sump routes to sanitary sewer. We observed a small crack in the concrete that separates the interior sump from the outdoor structure. The outdoor structure contained standing water (**Photo 5 & Photo 6**). At the time of inspection, it was unclear where the observed water conveyance/channel from the outdoor structure is ultimately discharged.

The concern was the crack observed within the interior sump containing excess boiler make-up water and water from the deaerator tank, possibly being discharged as stormwater via the observed water conveyance. In addition, the observed conveyance channel was not identified on the Facility Map.

During the closing conference, Mr. Maples discussed that he would work with PBS Engineering and Environmental Inc. (Facility Consultant) to determine the discharge location/drainage of the observed conveyance channel and address the issue accordingly.

AOC #2: Observed Unidentified Catch Basin Inlet Within Drainage Basin #1

Regulation and/or Permit Requirement:

Schedule A.10.b.i.3. within the permit states the required elements of the site map(s) to include: "conveyance and discharge structures such as piping or ditches."

Observation:

As discussed earlier in the report, during the walk-through within Drainage Basin #1 we observed a small grate/catch basin located near the southeast corner of the electrical shed (**Photo 11**). The grate/catch basin was not listed within the Facility Map (**Attachment C**).

The concern was the observed catch basin not identified on the Facility Map and the unknown discharge location from the observed catch basin at the time of inspection.

During the closing conference, Mr. Maples discussed that he would work with PBS Engineering and Environmental Inc. (Facility Consultant) to determine the discharge location of the catch basin and have it added to the Facility Map.

AOC #3: Discharge Piping/Flow Observed Within Eastern Municipal Drainage Ditch

Regulation and/or Permit Requirement:

Condition 1.7.b. within the permit states: "The permit registrant must separate any piping of interior floor drains and process wastewater discharge points from the storm drainage system to prevent unpermitted discharge of pollutants to waters of the state. Discharge from the floor drains to the stormwater drainage system is a violation of this permit."

Schedule A.10.b.i.3. within the permit states the required elements of the site map(s) to include: “conveyance and discharge structures such as piping or ditches.”

Observation:

As discussed earlier in the report, during the walk-through near the northern section of Drainage Basin #5, we also observed a small amount of water flowing into the eastern portion of the municipal drainage basin from a subsurface pipe (**Photo 10**). Mr. Maples wasn't aware of source of the observed water. As the inspection occurred during dry weather conditions, the concern was a possible non-stormwater source potentially entering the municipal drainage ditch.

During the closing conference, Mr. Maples discussed that he would work with PBS Engineering and Environmental Inc. (Facility Consultant) to determine the source of the observed piping/discharge and address the issue accordingly.

SECTION VI – CLOSING CONFERENCE**Closing Conference**

Following the walk-through and records review a closing conference was held with Mr. Maples within his office. I discussed our general observations, areas of concern and EPA's general inspection report/follow-up process. I then thanked him for his time and assistance during the inspection. Mr. Foster and I then departed the Facility.

SECTION VII – LIST OF APPENDICES

Attachment A –Aerial Image (Google Earth)

Attachment B – Vicinity Map

Attachment C – Facility Map

Attachment D – Photograph Log

Attachment E – Monthly Site Inspection Form (Template)

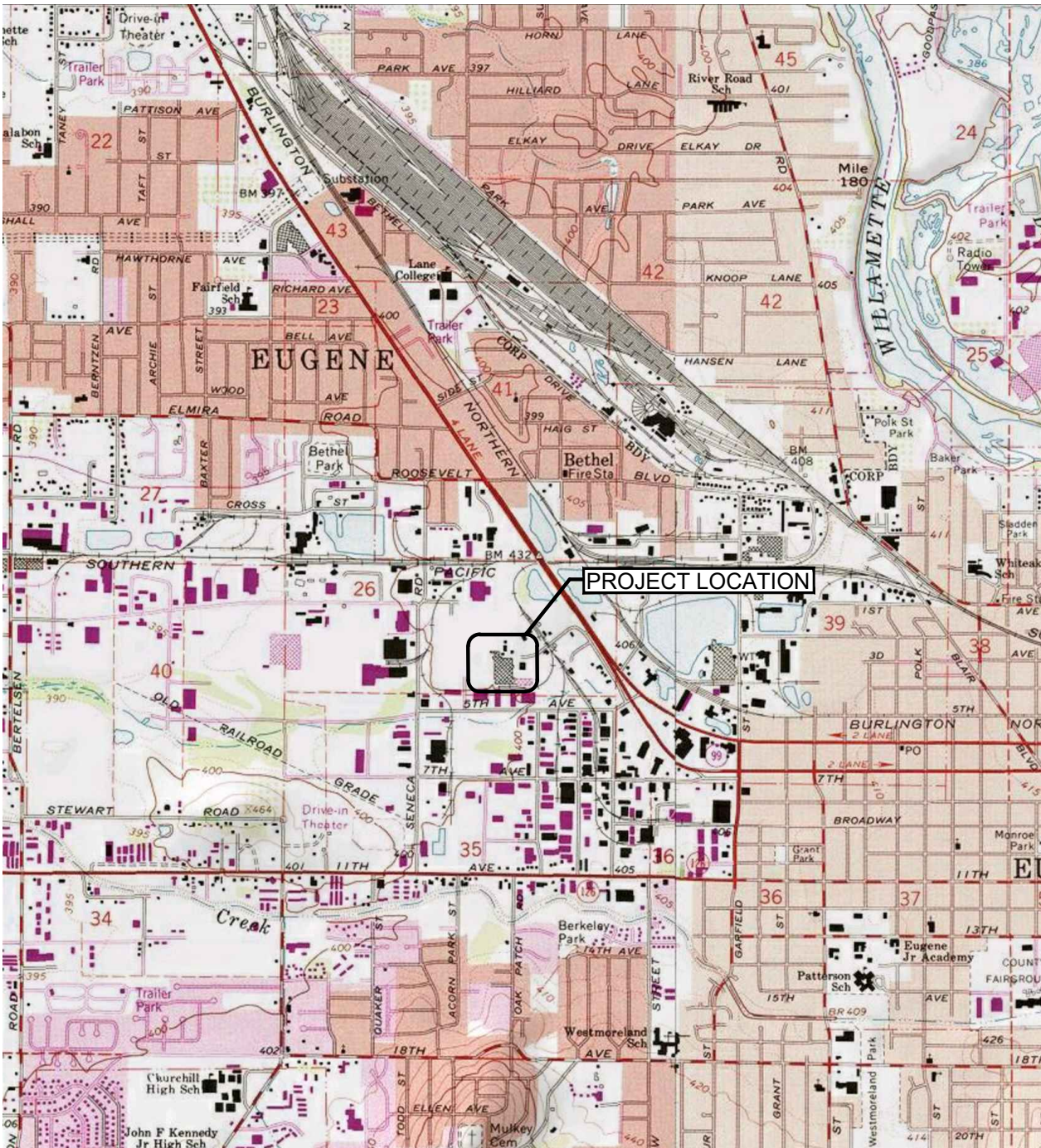
ATTACHMENT A

Aerial Image (Google Earth)

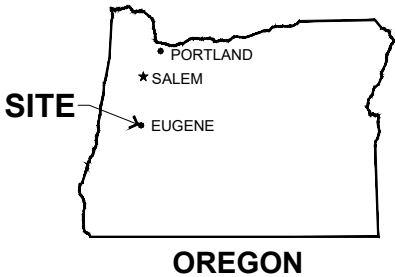


ATTACHMENT B

Vicinity Map



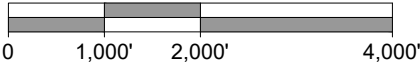
SOURCE: USGS EUGENE WEST QUADRANGLE, OR 1967, PHOTO REVISED 1986.



OREGON



SCALE: 1" = 2,000'



PREPARED FOR: EMERALD FOREST PRODUCTS, INC.



VICINITY MAP
118 HIGHWAY 99N.
EUGENE, OREGON

AUG 2021
52628.000

FIGURE

1

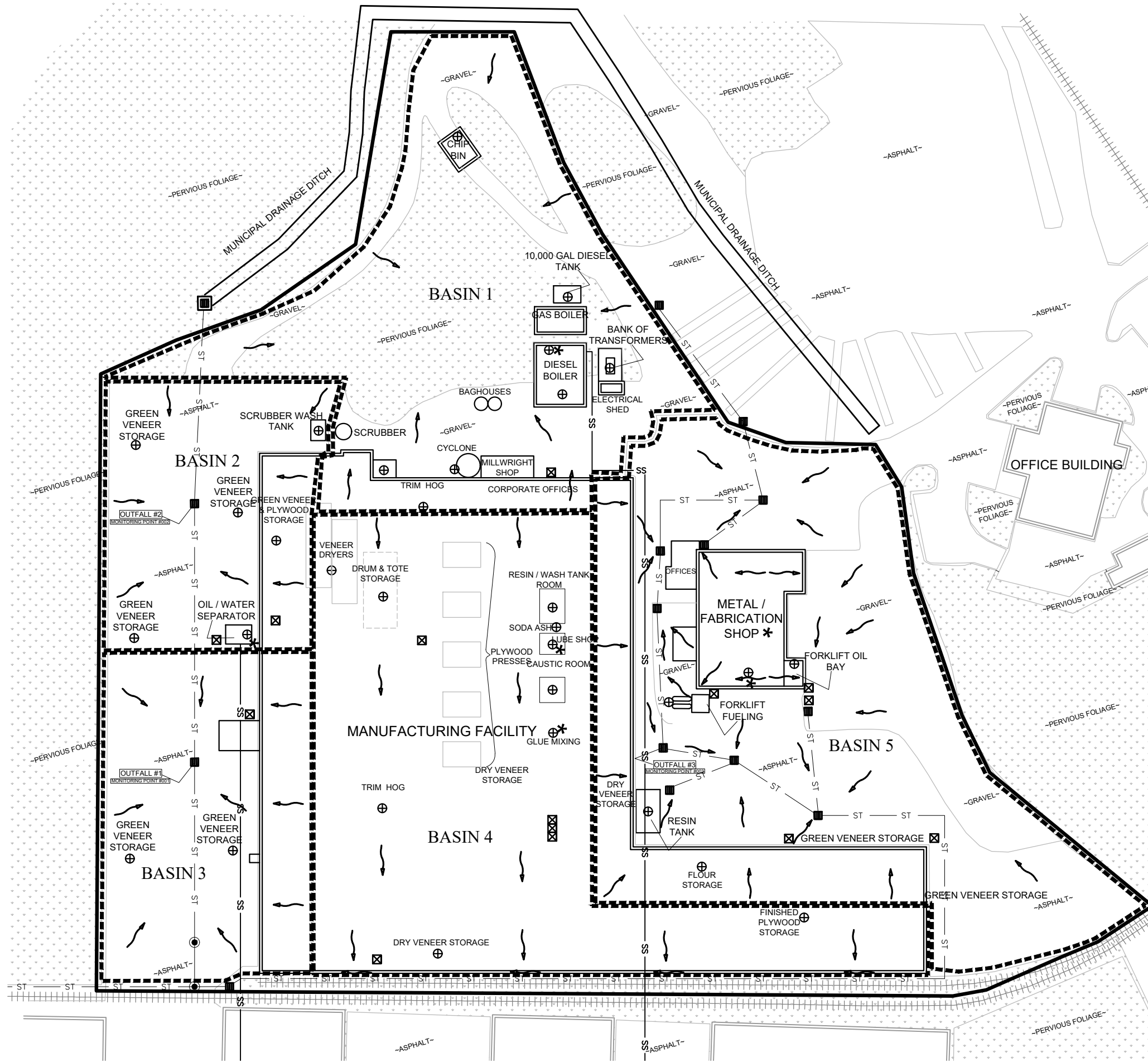
ATTACHMENT C

Facility Map

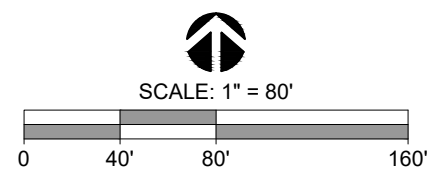


STORM WATER POLLUTION CONTROL PLAN
EMERALD FOREST PRODUCTS, INC. - PLANT #1
118 HIGHWAY 99 N., EUGENE, OREGON

PROJECT
52628.000
DATE
AUG 2021
FIGURE
2



- LEGEND**
- STORMWATER PIPE
 - SS SANITARY PIPE
 - DRAINAGE BASIN BOUNDARY
 - STORMWATER RUNOFF DIRECTION
 - STORMWATER MANHOLE
 - CATCH BASIN
 - SPILL KIT
 - SIGNIFICANT MATERIAL STORAGE AND LOADING
 - WOOD, METAL, OR PLASTIC RECYCLING CONTAINER
 - PERVIOUS FOLIAGE SURFACE



ATTACHMENT D

Photograph Log

All photographs taken by Jon Klemesrud on May 16, 2023

Nikon Coolpix AW100

Photograph Log – Emerald Forest Products -Plant 1



Photo #:01 (DSCN3256)

Description: Facing north, photo of the wastewater pit and skimmer located outside of the manufacturing building. Area is bermed, removed oil is recycled and wastewater is discharged to sanitary sewer.



Photo #:02 (DSCN3258)

Description: Facing southwest, photo of the facility's scrubber and scrubber wash tank. Observed some water coming off the scrubber and ponding on the ground. Determined to be a leak from the seal of the access hatch, was repaired at the time of inspection.



Photo #:03 (DSCN3257)

Description: Facing south, photo of the chip bin in the northern section of the facility. Area is bermed to the west along the municipal drainage ditch.



Photo #:04 (DSCN3259)

Description: Facing west, photo of water conveyance off of the older hog fuel fired boiler building.

Photograph Log – Emerald Forest Products -Plant 1



Photo #:05 (DSCN3260)

Description: Facing west, photo of basin off of the boiler building, discharging to the channel. Observed slight crack in the concrete structure holding the interior boiler make-up water being routed to sanitary.



Photo #:06 (DSCN3261)

Description: Facing west, photo of the north end of the old wood fired boiler building.



Photo #:07 (DSCN3262)

Description: Facing north, photo of the east end of the municipal drainage ditch. Observed some standing water.



Photo #:08 (DSCN3263)

Description: Facing south, photo of the east end of the municipal drainage ditch. Multiple connection pipes observed on both sides (including neighboring property).

Photograph Log – Emerald Forest Products -Plant 1



Photo #:09 (DSCN3264)
Description: Facing west, photo of northern catch basin within Basin 5.



Photo #:10 (DSCN3265)
Description: Facing west, observed flow within the eastern side of the municipal drainage basin.



Photo #:11 (DSCN3266)
Description: Facing north, photo of observed catch basin not on SWPCP Map.



Photo #:12 (DSCN3267)
Description: Facing north, photo of storm drain catch basin west of the metal/fabrication shop.

Photograph Log – Emerald Forest Products -Plant 1



Photo #:13 (DSCN3268)

Description: Facing north, photo of the Outfall #1 monitoring catch basin.



Photo #:14 (DSCN3269)

Description: Facing north, photo of roof drain downspout off of the southwest manufacturing facility roof.

EMERALD FOREST PRODUCTS

301 West 1st Ave.

Prague, UT 84303

Phone: (435) 833-8494 Fax: (435) 833-8495

Website:

Analytical Report

Date Reported: 01/03/2022

Emerald Forest Products

Emerald Forest Products Steamwater 1200-Z, 10

Received Date: 1/3/2022 2:40:00 PM

Sample Name: Douglas Fir

Sample Number: Environmental Water

2201875-001

Client Sample ID: 001

Collection Date: 1/3/2022 1:31:00 PM

Analysis	Method	Result	Qual	PQL	LOD	Units	Date Analyzed	Analyst
Iron	SM 3111 B	0.25		0.25	0.04	mg/L	01/03/2022 09:39	AS
Zinc	SM 3111 B	0.04		0.02	0.01	mg/L	01/03/2022 10:54	AS
Copper	SM 3113 B	0.0020		0.0020	0.0010	mg/L	01/03/2022 10:27	AS
Lead	SM 3113 B	ND		0.0020	0.0010	mg/L	01/03/2022 10:00	AS
Chemical Oxygen Demand	Hach 8000	28		5.0	2.8	mg/L	01/04/2022 16:11	JP
Total Suspended Solids	SM 2540 D	18		4.0	0.41	mg/L	01/04/2022 09:52	JP

Lab ID: 2201875-002

Client Sample ID: 002

Collection Date: 1/3/2022 1:49:00 PM

Analysis	Method	Result	Qual	PQL	LOD	Units	Date Analyzed	Analyst
Iron	SM 3111 B	0.04		0.02	0.04	mg/L	01/03/2022 09:39	AS
Zinc	SM 3111 B	0.04		0.02	0.01	mg/L	01/03/2022 10:54	AS
Copper	SM 3113 B	0.0017	J	0.0020	0.0010	mg/L	01/03/2022 10:27	AS
Lead	SM 3113 B	ND		0.0020	0.0010	mg/L	01/03/2022 10:00	AS
Chemical Oxygen Demand	Hach 8000	18		5.0	2.8	mg/L	01/04/2022 16:11	JP
Total Suspended Solids	SM 2540 D	2.8	J	4.0	0.41	mg/L	01/04/2022 09:52	JP

Lab ID: 2201875-003

Client Sample ID: 003

Collection Date: 1/3/2022 2:00:00 PM

Analysis	Method	Result	Qual	PQL	LOD	Units	Date Analyzed	Analyst
Iron	SM 3111 B	0.07		0.02	0.04	mg/L	01/03/2022 09:39	AS
Zinc	SM 3111 B	0.04		0.02	0.01	mg/L	01/03/2022 10:54	AS
Copper	SM 3113 B	0.0018	J	0.0020	0.0010	mg/L	01/03/2022 10:27	AS
Lead	SM 3113 B	ND		0.0020	0.0010	mg/L	01/03/2022 10:00	AS
Chemical Oxygen Demand	Hach 8000	7.2		5.0	2.8	mg/L	01/04/2022 16:11	JP
Total Suspended Solids	SM 2540 D	4.2		4.0	0.41	mg/L	01/04/2022 09:52	JP

Refused

Authorized by ORECAP:

Lead of Operation

Signature of Client Representative

Not Authorized on the Reporting Chain

Project Lead

Planner/Operations Lead or Planning Lead

Outflow

01/15/2028 12:20

Page 3 of 7
Original

Photo #:15 (DSCN3270)

Description: Photo of the ALG Analytical Report from the 01/03/2022 sampling event.

4517 DOWNEY AVE. #200
SOL Rm 104
DOWNEY, CA 90241
TEL: (650) 641-8400 FAX: (650) 641-5562
WWW.ALG-TESTING.COM

ALG
ANALYTICAL
LABORATORIES

Analytical Report

Date Reported: 03/23/2022

Client: 03/23/2022

Client: 2201875
Project: Emerald Forest Products
Project: Emerald Forest Products Stream 1206-27, C1

Received Date: 3/21/2022 12:18:00 PM
Sample Name: Douglas Fir
Matrix: Environmental Water

Lab ID: 2201875-001	Client Sample ID: 001	Collection Date: 3/21/2022 10:49:00 A						
Analysis	Method	Result	Qual	PQL	LOD	Units	Date Analyzed	Analyst
Iron	SM 3111 B	0.11		0.02	0.04	mg/L	03/23/2022 09:48	AS
Zinc	SM 3111 B	0.04		0.02	0.01	mg/L	03/23/2022 14:40	AS
Copper	SM 3113 B	0.0019	*	0.0040	0.0020	mg/L	03/23/2022 17:00	AS
Lead	SM 3113 B	ND		0.0020	0.0010	mg/L	03/23/2022 16:57	AS
Chemical Oxygen Demand	Hach 8000	58		5.0	2.8	mg/L	03/23/2022 16:58	AS
Total Suspended Solids	SM 2540 D	2.8	J	4.0	0.41	mg/L	03/23/2022 16:16	AS

Lab ID: 2201875-002	Client Sample ID: 002	Collection Date: 3/21/2022 11:09:00 A						
Analysis	Method	Result	Qual	PQL	LOD	Units	Date Analyzed	Analyst
Iron	SM 3111 B	0.07		0.02	0.04	mg/L	03/23/2022 16:46	AS
Zinc	SM 3111 B	0.04		0.02	0.01	mg/L	03/23/2022 14:40	AS
Copper	SM 3113 B	0.0019		0.0040	0.0020	mg/L	03/23/2022 17:00	AS
Lead	SM 3113 B	ND		0.0020	0.0010	mg/L	03/23/2022 16:57	AS
Chemical Oxygen Demand	Hach 8000	47		5.0	2.8	mg/L	03/23/2022 16:58	AS
Total Suspended Solids	SM 2540 D	2.8	J	4.0	0.41	mg/L	03/23/2022 16:16	AS

Lab ID: 2201875-003	Client Sample ID: 003	Collection Date: 3/21/2022 11:28:00 A						
Analysis	Method	Result	Qual	PQL	LOD	Units	Date Analyzed	Analyst
Iron	SM 3111 B	0.10		0.02	0.04	mg/L	03/23/2022 09:48	AS
Zinc	SM 3111 B	0.04		0.02	0.01	mg/L	03/23/2022 14:40	AS
Copper	SM 3113 B	0.0019	*	0.0040	0.0020	mg/L	03/23/2022 17:00	AS
Lead	SM 3113 B	0.0012	J	0.0020	0.0010	mg/L	03/23/2022 16:57	AS
Chemical Oxygen Demand	Hach 8000	94		5.0	2.8	mg/L	03/23/2022 16:58	AS
Total Suspended Solids	SM 2540 D	48		4.0	0.41	mg/L	03/23/2022 16:16	AS

Notes: 1. ALG is Accredited by NELAP
2. LCR - Maximum Contaminant Level
3. MCL - Maximum Contaminant Level
4. Other than Maximum of the Drinking Water Act

Outliers: * Value exceeds Maximum Contaminant Level (MCL)
* Value exceeds Maximum Contaminant Level (MCL)

03/23/2022 12:21

03/23/2022 12:21

03/23/2022 12:21

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03/23/2022 12:21

Page: 1
Report ID: 2201875-001

Page: 1
Report ID: 2201875-001

Page: 1
Report ID: 2201875-001

Photo #:16 (DSCN3271)

Description: Photo of the ALG Analytical Report from the 03/21/2022 sampling event.

ATTACHMENT E

Monthly Site Inspection Form (Template)

Monthly SWPCP Inspection Checklist

Instructions: The purpose of this checklist is to inspect equipment, oil storage containers, and industrial activities that may impact stormwater quality at Emerald Forest Products. Completion of this monthly inspection checklist is intended to meet Industrial Stormwater General Permit 1200-Z inspection requirements. If a deficiency is noted, which could result in pollution of stormwater or any release of oil to the environment, you must provide a brief explanation of the problem found and notify the facility environmental manager at 541.954.1871. After completing the inspection, a copy of this checklist must be put on file with the SWPCP for a period of at least three years.

Copies of the SWPCP site maps must be brought on the inspection to ensure they are current and accurate, and so they can be used as an aid to record locations of any issues identified during the inspection.

Observation of Stormwater Discharge: The permit requires an inspector to observe stormwater discharges at the discharge point. Visual observations must be conducted during a discharge event if one occurs during the month, regardless of whether the monthly site inspection has already occurred. Visual monitoring is not required to take place on the same day as the monthly SWPCP site inspection. The inspector shall use a clean, colorless glass or plastic container to dip a sample of the discharge flowing at the monitoring point and make observations in a well-lit area. Record the date and time of visual monitoring in the location specified below. If visible signs of stormwater pollution are observed, a Tier 1 corrective action must be initiated and completed within 30 days of this inspection. If no stormwater is discharging at the time of inspection, then the associated inspection items should be documented as NA (Not Applicable). If no discharge occurs during normal working hours, indicate no discharge on the last working day of the month.

Inspector Name:	Inspector Title:	Weather Conditions:
Date:	Time:	Stormwater Flowing at Outfalls during Inspection? (circle one) YES NO If yes, complete Visual Monitoring section below. If no, complete Visual Monitoring at another time while discharging stormwater.

Location	Inspection Items	Observations / Required Maintenance
Stormwater Outfall 1 (#001)	Floating or suspended solids	
	Visible oil sheen	
	Discoloration	
	Odor	
	Foam	

Location	Inspection Items	Observations / Required Maintenance
	Signs of pollutants discharging to receiving waters	
	Unauthorized discharges or flow during dry weather	
Stormwater Outfall 2 (#002)	Floating or suspended solids	
	Visible oil sheen	
	Discoloration	
	Odor	
	Foam	
	Signs of pollutants discharging to receiving waters	
	Unauthorized discharges or flow during dry weather	
Stormwater Outfall 3 (#003)	Floating or suspended solids	
	Visible oil sheen	
	Discoloration	
	Odor	
	Foam	
	Signs of pollutants discharging to receiving waters	
	Unauthorized discharges or flow during dry weather	
Stormwater Treatment Facilities/ Drainage Conveyance System	BMPs and treatment structures (e.g., vegetated swales) in good condition, operational, and free from debris that may impair function	
	Signs of pollutants entering the drainage system	
	Need for repair, cleaning, replacement, reconditioning or any other maintenance	

Location	Inspection Items	Observations / Required Maintenance
	Presence of unauthorized discharges to stormwater system including domestic wastewater, vehicle/equipment/container wash water and maintenance fluids from floor drains	
Catch Basins	Accumulation of debris in catch basin sumps and on filter fabric inserts	
	Note condition of filter fabric inserts	
	Damaged grates, elbows, or frame	
	Oil/grease scum	
	Sediment buildup	
Industrial Materials Storage Areas	Presence of residue, debris or industrial materials that could come into contact with stormwater	
	Leaks or spills from industrial equipment, drums, tanks and other containers	
	Tracking or blowing of waste material	
	Storage areas for vehicles/equipment awaiting maintenance	
	Vehicle/equipment maintenance areas (indoor and outdoor)	
Paved Surfaces	Presence of accumulated dust and debris	
	Signs of erosion or sediment/dust sources that discharge to storm drains	
Maintenance Shop	Maintenance tools, equipment and materials stored inside the building under cover. Drums and tanks are provided with secondary containment. Check for signs of leaks from vehicles or equipment.	
Lube Shop	Maintenance tools, equipment and materials stored inside the building under cover. Drums and tanks are provided with secondary containment. Check for signs of leaks from tanks or equipment.	
Waste / Recycling Receptacles	Waste / Recycling is properly stored under cover	
	Receptacles are in good condition, not leaking	

Location	Inspection Items	Observations / Required Maintenance
	Areas around receptacles are free of contaminants	
Spill Response Kits	Present and well equipped at the locations designated on the site map	
Tracking Industrial Vehicle Entry/ Exit Points	Off-site tracking of sediment or dirt	
	Off-site tracking of wood debris	
Loading/Unloading Areas	Maintenance chemical loading/unloading area (Shop)	
	Fuel unloading areas (Tanks at Fuel Station)	
	Glue / Resin loading and unloading areas	
Entire Facility	Any previously unidentified sources of pollutants	

BULK STORAGE TANKS	<u>1. Tank Exterior</u> Check for signs of physical damage or corrosion on tank exterior, especially at fill inlet, outlet pipe, and gauge connections. Make sure all lids are securely fastened. Inspect condition of containment structure for signs of cracking, deterioration, corrosion, or other damage.		<u>2. Supports/Foundation</u> Check container supports and foundations for signs of damage, corrosion or significant settlement. Inspect the ground around container for signs of oil leaks.		<u>3. Connections</u> Check dispenser nozzles and hoses for physical damage or wear. Inspect for signs of excessive wear or leakage at lid, hose connections, pipe joints and valve stems.	
	OK	Observations	OK	Observations	OK	Observations
Diesel Fuel Tank (10,000 gallons)						
Engine Oil – Tank (220 gal) and drums (55 gal) within Maintenance Shop, Forklift shop (30 gal)						
Used Oil – Tank (220 gal) east of Glue Line, Drums (50 gal) in Maintenance Shop and on Dryer #3 concrete pad						

Resin / Glue – Resin Tank Room by Maintenance Shop (10,000 gal), Wash-water tank (5,700 gal), Caustic Room (10,000 gal)						
Antifreeze in drums (55 gal) in Maintenance Shop, in Forklift shop (30 gal)						
Hydraulic oil drums in Maintenance Shop (55 gallons each)						
Transmission Fluid drums in Lube Shop and Maintenance Shop (55 gal)						
Flour bags (50 lbs each) in plywood storage building						
Soda Ash bags (65 lbs each) outside Resin/Wash-water tank room						
Scrubber Wash-water Tank (400 gal) at north end of manufacturing building						
Boiler Chemical drums (120 gal) in boiler house						
Dryer Cleaner drums (55 gal) in sheds next to dryers / scrubbers						
Miscellaneous Buckets within Lube and Maintenance Shops (5 gal)						
Miscellaneous Drums within Lube and Maintenance Shops (55 gal)						
OIL-FILLED ELECTRICAL EQUIPMENT	<u>1. Container Exterior</u> Check for signs of physical damage or corrosion on container exterior.		<u>2. Supports/Foundation</u> Check concrete pad around container for signs of physical damage or corrosion. Check ground around container for signs of oil leaks.		<u>3. Connections</u> Check for signs of wear, corrosion, or leaks at any hose connections, valves and fill pipes.	
<u>CONTAINER NAME</u>	OK	Observations	OK	Observations	OK	Observations
Electrical Transformers to the east of the boiler houses						

Corrective Action and SWPCP Plan Modification Descriptions (provide a brief explanation):

Inspector Certification (This section must be completed by the person who conducted the inspection.)

I certify that this report is true, accurate, and complete, to the best of my knowledge and belief.

Signature: _____ Name (Print): _____ Title: _____ Date: _____