

INSPECTION REPORT

Inspection Entry Date/Time	11/22/2024 10:13 AM (PT)	Announced: No	
Inspection Exit Date/Time	11/22/2024 03:50 PM (PT)	Access: Granted	
Weather	50°F, Partly Cloudy		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	Rosboro, LLC		
Facility or Site Name	Rosboro Lumber Company - Springfield Facility		
Facility Physical Address	2509 Main Street		
City, State, Zip Code	Springfield, Oregon 97477		
County	Lane		
Facility GPS Coordinates	44.043527, -122.991031		
FRS ID	110000771200		
Permit Number	ORR227182		
SICs	2411 (Log Storage & Handling) 2421 (General Sawmills & Planing Mills) 2439 (Structural Wood Members, not elsewhere classified)		
Lead Inspector:			
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – Opening Conference

I arrived at the Rosboro Lumber Company - Springfield Facility (the “Site” or “Facility”), located at 2509 Main Street, Springfield, Oregon, at 10:13 AM (PT) on 11/22/2024 for an unannounced inspection. I presented my credentials to Jim Daniels and informed him I was there to conduct an inspection to determine compliance with the Clean Water Act (CWA) and the facility’s Oregon Department of Environmental Quality (ODEQ) 1200-Z permit for industrial stormwater, permit # ORR227182. This report is based on information supplied by Mr. Daniels, my direct observations, and records and reports maintained by the permittee. In addition, information gathered prior to or after the Inspection from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
Rosboro Lumber Company	Jim Daniels	Environmental Supervisor	Yes	Yes

Facility Information

Responsible Official?	Jim Daniels
Type of Operation?	Lumber mill
Years in Operation?	Been in operation under Rosboro since 1938
Size of Facility?	The total size of the site, including log storage, is approximately 104 acres.
Is property leased?	The facility is a mix of owned and leased property.
Shifts/Days of Operations?	The facility has approximately 300 employees. The sawmill runs, on average, 4 days a week, 10 hours per day.
Industrial activities exposed to stormwater?	Logs, finished lumber, package products, and heavily equipment, i.e., forklifts, etc., are stored outside.
Personnel conducting inspections/sampling?	Mr. Daniels is the Environmental Supervisor and performs all inspections and conducts all sampling.
How many Outfalls/Sampling locations does the facility have?	The facility has 12 outfalls but not all of them are monitored. Six of the outfalls are considered “substantially identical” to one or more of the other six outfalls. The facility is only required to monitor Outfalls 001, 010, 013, 018, 023, 010, 018, and 033. However, the facility has a monitoring waiver for most parameters at several of its outfalls. The only outfalls that are monitored are 001 for total copper (Cu) & chemical oxygen demand (COD), and 013 for total suspended solids (TSS), total copper (Cu) & chemical oxygen demand (COD). The facility’s monitoring waiver ends on June 30, 2025, and sampling must recommence on July 1, 2025.
Receiving Waters?	The facility has two proximal receiving waters, Mill Race Creek, and the Q Street ditch, both flow to the Willamette River. The Q Street ditch receives water from Outfalls 001, 002, 005, 006, 009, 010, 011, 013, 023, 033, and 101. Mill Race Creek received water from Outfall 018.

SECTION II – Observations

Location: Swale/Outfall 001		AOC: Yes
Observation #: RA1-OB-001	Date: 11/22/2024	Weather: 50F, Partly Cloudy
Outfall 001 is in the bioswale used to contain and guide stormwater. Biochar bags are placed around the inlet as a Best Management Practice (BMP) to mitigate the discharge of pollutants, i.e. copper, as part of the facility's Tier 2 action plan. The biochar bags needed maintenance. The upper right segment of the biochar bags is allowing water to pass without filtration through the bags.		
Photo 1. IMG-202411221121172117150014.jpg		

SECTION III – Records Review

Records may not be in sequential order.

Record: DMR Reports		AOC: No
Ref #: RA1-RR-007	Reviewed By: Raymond Andrews	Reviewed Date: 01/08/2025
Post inspection, I requested to review the facility's Discharge Monitoring Reports (DMRs) from 1Q 2022 through 4Q 2024. The facility provided the following DMRs: • Jul - Sep 2022 (1Q) • Oct - Dec 2022 (2Q) • Jan - Mar 2022 (3Q) • Jan - Mar 2023 (3Q) I pulled all the DMRs not provided by the facility from the Oregon Department of Environmental Quality's (ODEQ) "Public Submittal Records" webpage, https://ordeq-edms-public.govonlinesaas.com/pub/pub-rcd/home . I did not note any areas of concern.		
Record: Other - Routine Monthly Facility Inspections		AOC: No
Ref #: RA1-RR-006	Reviewed By: Raymond Andrews	Reviewed Date: 12/31/2024
Post inspection, I reviewed the facility's Routine Monthly Inspections from January 2023 through November 2024. The inspections are maintained on EXCEL spreadsheets, but they are comprehensive and appear to cover all permit requirements. I did not note any areas of concern.		
Record: Other - Training Records		AOC: No
Ref #: RA1-RR-005	Reviewed By: Raymond Andrews	Reviewed Date: 11/22/2024
At the time of inspection, I reviewed annual training records for 2021 through 2024. I did not note any areas of concern.		
Record: Other - ODEQ Monitoring Waiver Letter		AOC: No
Ref #: RA1-RR-004	Reviewed By: Raymond Andrews	Reviewed Date: 11/22/2024
At the time of inspection, I reviewed the Monitoring Waiver Letter from the Oregon Department of Environmental Quality (ODEQ) to the facility based on a monitoring waiver request the facility submitted through ODEQ's on-line portal on March 2, 2023. The ODEQ letter waived monitoring of most parameters of the facility's 5 monitoring locations, 001, 010, 013, 018, and 023. The waiver letter still required monitoring for total copper and Chemical oxygen demand (COD) at locations 001, and TSS, total copper and COD at location 013.		

Record: Other - Corrective Action Tier 2 Report		AOC: No
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 11/22/2024
At the time of inspection, I reviewed the facility's Corrective Action Tier 2 Report, dated November 7, 2023. The Tier 2 Corrective Action was required because the facility exceeded the geometric mean of total suspended solids (TSS) benchmark for the 2022 through 2023 monitoring year. The facility reported a geometric mean of 284 mg/L at Monitoring Location SW-013 while the corresponding benchmark value for TSS is 100 mg/L. The facility estimated an average of 321 pounds of aerial particulate debris is generated monthly immediately west of the veneer ditch. Due to prevailing winds from the west, and through visual confirmation, the facility and its contractor, PBS, determined a significant portion of aerial particulate debris appears to be depositing into the veneer ditch. Particulate debris deposition resulting from these typical industrial operations is assumed to be contributing to excessive TSS levels in SW-013. On-site treatment to reduce TSS included closure of the veneer ditch via a ducted manifold and subsurface stormwater drainage pipe connecting to an existing stormwater drainage confluence point and inclusion of in-line TSS removal technologies implemented immediately east of SW-013 to capture and treat all stormwater collected from Basin C1. Future TSS permit benchmark exceedances will be prevented through a combination of source control and physical screening of particulate debris.		
Record: Other - SWPCP Addendum for Tier 2 Action		AOC: No
Ref #: RA1-RR-002	Reviewed By: Raymond Andrews	Reviewed Date: 11/22/2024
At the time of inspection, I reviewed the facility's SWPCP Addendum for Tier 2 Corrective Action, dated December 31, 2024. The Tier 2 Corrective Action was required because the facility exceeded the geometric mean total copper benchmark for the 2021 through 2022 monitoring year. The facility reported a geometric mean of 0.022 mg/L at Monitoring Location 001 while the corresponding benchmark value for total copper is 0.015 mg/L. To reduce the concentration of total copper, the Tier 2 Correction Action chose to install biochar filled filter socks upstream, and around the inlet of, Outfall 001.		
Record: Other - Stormwater Pollution Control Plan (SWPCP)		AOC: No
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews	Reviewed Date: 11/22/2024
At the time of inspection, I reviewed the facility's Stormwater Pollution Control Plan (SWPCP), dated September 4, 2024. I did not note any areas of concern.		

SECTION IV – Sampling Activities

No sampling was conducted.

SECTION V - AREAS OF CONCERN

Areas of Concern may not be in sequential order.

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

AOC Reference #: RA1-OB-001	Location: Swale/Outfall 001
Permit Requirement Schedule A.2.a of the permit states, in part, "The permit registrant must select, design, install, implement and Maintain (emphasis added) control measures, including all best management practices (BMPs)..."	
AOC: Biochar bags (BMP) needed maintenance because they were allowing unfiltered water to pass.	

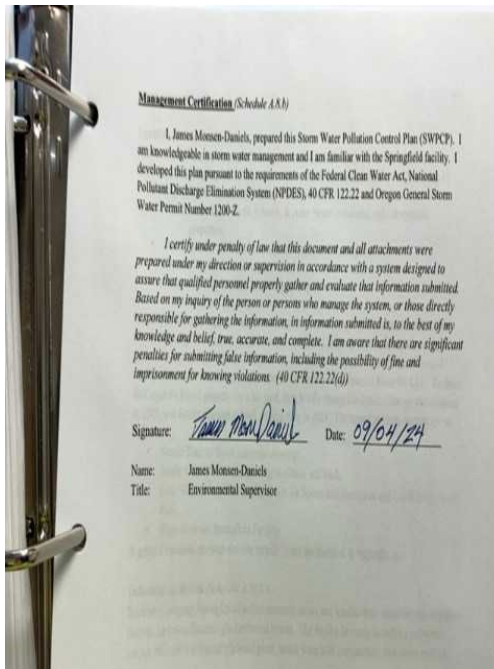
SECTION VI – Closing Conference

I held a closing conference with Mr. Daniels at 03:50PM (PT) on 11/20/2024 for the inspection. During the closing conference, I discussed any observations and Areas of Concern I identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

SECTION VII – List of Appendices

1. Photo Log

APPENDIX 1: Photo Log



SWPCP signature page			IMG-20241122105113511373977.jpg
11/22/2024 10:51 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04219451, -122.98983568			



Log Yard			IMG-20241122110524524106818.jpg
11/22/2024 11:05 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04205617, -122.98958469			
Stacked logs waiting for milling.			



Storage Area near Production Building			IMG-20241122110556556109969.jpg
11/22/2024 11:05 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04197833, -122.98835305			
Laminated stock, i.e., Lam Stock, that did not make the grade and will be re-cut to dimensional lumber.			



Hogg Fuel Storage Area			IMG-2024112211094094096606.jpg
11/22/2024 11:09 AM	No CBI	No PII	Photographer: Raymond Andrews
44.0421393, -122.98972186			
Hogg fuel piles that have been delivered and is waiting to be used in the boilers.			



Bioswale/Outfall 001			IMG-202411221121172117150014.jpg
11/22/2024 11:21 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04590985, -122.98660826			
Bioswale with biochar bags around inlet as required by part of the Tier 2 corrective action plan. Biochar bags need maintenance. Water that enters the inlet flows out through the white pipe and discharges to the Q Street ditch. Samples are collected from the center of the biochar bags using a bottle on a long pole.			



Orenco Filters			IMG-20241122113008308163948.jpg
11/22/2024 11:30 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04425762, -122.98935753			
The iron grate covers a sediment catch basin. There are four Orenco filters in the foreground. The flow is split equally through the four filters and comes back together to enter underground to an “Aqua-Swirl®” system. NOTE: The Aqua-Swirl® Stormwater Treatment System is a custom engineered, post-construction flow-through water quality device designed to remove coarse sediment, debris and free-floating oil by utilizing hydrodynamic separation technology. (Definition is from the AquaShield Website, Aqua-Swirl®, Stormwater Hydrodynamic Separator - AquaShield, Inc., accessed 1/10/2025.)			



Aqua-Swirl®			IMG-202411221135203520132602.jpg
11/22/2024 11:35 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04589363, -122.99048206			
Aqua-Swirl® inlet in foreground.			



Outfall 013			IMG-202411221135563556145852.jpg
11/22/2024 11:35 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04586392, -122.99000677			
Outfall 013 in relation to Aqua-Swirl®.			



Outfall 013			IMG-20241122113601361156832.jpg
11/22/2024 11:36 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04584046, -122.99002219			
Outfall 013 sampling point.			



Outfall 023			IMG-202411221139263926175021.jpg
11/22/2024 11:39 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04585255, -122.99003692			
Outfall 023 sampling point.			



Outfall 033			IMG-202411221141334133201438.jpg
11/22/2024 11:41 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04582095, -122.99236734			



Outfall 003			IMG-202411221141404140189201.jpg
11/22/2024 11:41 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04584904, -122.99164982			
Flow in relation to Outfall 003			



Outfall 003 Sampling Point			IMG-202411221143134313131416.jpg
11/22/2024 11:43 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04569543, -122.99223538			
Outfall 003 is sampled from the grate to the left of the outfall.			



Outfall 005			IMG-202411221149214921182370.jpg
11/22/2024 11:49 AM	No CBI	No PII	Photographer: Raymond Andrews
44.04545265, -122.99376482			
Outfall 005 is outside of the property fence boundary.			



Evaporation pond			IMG-20241122120148148112174.jpg
11/22/2024 12:01 PM	No CBI	No PII	Photographer: Raymond Andrews
44.04517103, -122.99642254			
Evaporation pond, photo 1. The white pipe in the background is for overflow. If the pond's water level gets too high, water overflows into the pipe and flows west to discharge out of Outfall 006 into the city's sewer system. Outfall 006 is not a monitoring point.			



Evaporation pond			IMG-20241122120158158117976.jpg
11/22/2024 12:01 PM	No CBI	No PII	Photographer: Raymond Andrews
44.04481117, -122.99635071			
Evaporation pond, photo 2.			



Outgoing Product Storage Yard			IMG-20241122120222270959.jpg
11/22/2024 12:02 PM	No CBI	No PII	Photographer: Raymond Andrews
44.04433259, -122.99560422			
Packaged "glulam beams". NOTE: A "glulam beam" is a structural engineered wood product made up of layers of dimensional lumber bound together with long-lasting, moisture-resistant structural adhesives. (Definition is from the HPD Consultant, inc. website, https://www.hpdconsult.com/what-is-glulam-beam/ , accessed 1/10/2025.)			