

NPDES Inspection Report - Stormwater Industrial

National Database Information		
Inspection Date: 7/27/2023	Inspection Type: Industrial Stormwater	
Entry/Exit Time: 10:30 am / 12:30 pm	NPDES ID Number: COUT00258	
SIC Code: 2411	Inspection ID: 202307_COUT00258	
Lead Inspector and affiliation: Stephanie Meyers / EPA Region 8		
Inspector and affiliation: Althea Wilson / EPA Region 8		
Inspector and affiliation: Eric Philyaw / Colorado Department of Public Health and Environment		
Site/Facility Name and Location: Summit Logging, LLC 1035 E Northern Avenue Pueblo, CO 81006		
Permit Information		
Is the permit on site and available? Unpermitted facility	Date Application Submitted: Unpermitted facility	
Latitude: 38.244527°N	Longitude: -104.597615°W	
Receiving Water(s): Unnamed ditch, thence to the Arkansas River	Acreage: approximately 6.4 acres	
Regulatory Inspector's source of information: Facility observations		
Contact Information		
	Name(s)/Title	
Facility Contacts: Primary lead and present during inspections	Micah Langston / Corporate Manager / Pueblo Wood Products and Dunmire Development Corporation / Primary lead during the inspection	
	Howard Hallman / President / E-Quest Corporation / present during the inspection	
	Quinn Corum / Intern / E-Quest Corporation / present during the inspection	
	Mike Fisher / Leasee / present during the inspection	
	Brad Dunmire / Dunmire Development Corporation / present during the inspection	
	Darla Dunmire / President / Dunmire Development Corporation / present during the inspection	
	Brian Frazier / Supervisor / Dunmire Development Corporation / present during the inspection	
Person/Company meeting definition of "Operator"	Summit Logging, LLC	
Authorized Official(s) (Per NOI or SWPPP)	N/A, since there is currently no permit for this facility	
Areas Evaluated During Inspection		
Permit	Self-Monitoring Program	Pollution Prevention
Records	Compliance Schedule	<u>Stormwater</u>
<u>Facility Site Review</u>	Laboratory	<u>No Exposure</u>
Effluent/Receiving Waters	Operations and Maintenance	Other:

NPDES Inspection Report - Stormwater Industrial

Flow Measurement	Sludge Handling/Disposal	Other:
Report Review and Signature		
Drafter Name	Address/Phone Number	Date
Althea Wilson	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	8/7/2023
	303-312-6026	
Reviewer Name	Address/Phone Number	Date
Stephanie Meyers	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	8/28/2023
	303-312-6938	
Supervisor Signature/Name	Address/Phone Number	Date
 Digitally signed by EMILIO LLAMOZAS Date: 2023.09.15 10:49:13 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	9/15/2023
	Emilio Llamozas	

Inspection Narrative and Site Description
On July 27, 2023, U.S. Environmental Protection Agency (EPA) inspectors Stephanie Meyers and Althea Wilson along with Colorado Department of Public Health and Environment (CDPHE) inspector Eric Philyaw arrived at Summit Logging (facility) at 10:30 am to conduct an inspection and evaluate the facility's need for industrial stormwater permit coverage. The EPA and CDPHE performed a joint inspection at this facility. The inspection was announced one week prior to the inspection, to coordinate logistics for the inspection and to ensure that appropriate personnel would be available. The EPA inspectors along with CDPHE met with Micah Langston, Corporate Manager for Dunmire Development Corporation, Pueblo Wood Products, and Summit Logging, LLC along with other facility representatives listed above. EPA inspector, Stephanie Meyers, presented her credentials and had an opening conference to explain the purpose of the inspection. The inspectors began by going through a series of checklist questions with the facility representatives. Once complete, the inspectors proceeded to inspect the facility and asked questions to the facility representative to help the inspectors evaluate the need for industrial stormwater permit coverage. Throughout the inspection, the inspectors noted their observations in a checklist. Photographs taken during the inspection are included in the attached photo log. Summit Logging is located at 1035 E Northern Avenue in Pueblo, Colorado just across Northern Avenue northwest from Pueblo Wood Products. The property is leased by several companies, including Pueblo Wood Products and Summit Logging. The facility mainly stores and cleans logging equipment on-site and occasionally creates biochar. The biochar process involves burning the wood until carbon is left. This granulated carbon is then used for erosion control and water filtration. Facility representatives stated they fuel, weigh, and check logging equipment before sending it to the forest for

NPDES Inspection Report - Stormwater Industrial

Inspection Narrative and Site Description

logging. Upon their return they are weighed again with the logs and then cleaned on-site in wash bays. The logs then go to Pueblo Wood Products to be turned into crates and pallets to be sold within the State of Colorado. They store sawdust, firewood, and drums of biochar outside to be sold to the public.

After the opening conference and site walk of Pueblo Wood Products, inspectors walked the Summit Logging, LLC facility and first observed the logging machinery stored outside (photo 106). Next, inspectors observed stockpiles of wood materials (including firewood and sawdust) on the south border of the facility (photo 107). The facility stores a 200-gallon tank of fuel outside on-site with secondary containment (photo 108). In the center of the facility are the wash bays for the machinery after it has been used, where according to a facility representative wash-water flows into the catch basin (photo 109). Inspectors walked the perimeter of the property and observed a stormwater drainage channel on the eastern boundary (photo 110) that had a potential discharge location at the eastern corner of the property (photo 111).

Next, inspectors walked the north boundary of the property where equipment was stored outside uncovered (photo 112). Lastly, the facility representative indicated that biochar was occasionally produced on-site depending on the time of the year and the demand. Toward the center of the facility, inspectors observed drums of biochar stored outside (photo 113).

After the inspection of the facility, the inspectors returned to the main office and held a closing conference with Micah Langston where they discussed observations.

Findings, Corrective Actions, and Recommendations

Finding 1: Summit Logging, LLC is an industrial facility under industrial stormwater Sector A: Timber Products, operating without industrial stormwater permit coverage.

The facility's primary SIC code is 2411 (Logging), which falls under industrial stormwater Sector A: Timber Products, requiring industrial stormwater permit coverage. See attached fact sheet for additional information on Sector A.

The facility has outdoor industrial operations/activities as well as outdoor storage of materials which are exposed to stormwater (photos 107 to 109 and 112 to 113). Inspectors observed a stormwater drainage channel on the eastern boundary (photo 110) that had a potential discharge location at the eastern corner of the property (photo 111).

Regulatory Information:

In 1987, the US Congress amended the Clean Water Act to expressly include stormwater discharges from industrial activities as requiring Clean Water Act controls. In 1990, EPA issued regulations that require specific industrial activities to obtain permits in order to discharge stormwater from their facilities under 40 C.F.R. 122.26. The Water Quality Control Division of the Colorado Department of Public Health and Environment has direction and authority to administer stormwater permitting in Colorado through the Colorado Water Quality Control Act, and its implementing regulations and permits.

NPDES Inspection Report - Stormwater Industrial

Findings, Corrective Actions, and Recommendations

In accordance with the Colorado Water Quality Control Act and the Colorado Discharge Permit System (CDPS) Regulations 5-CCR 1002-61, CDPS discharge permit coverage is required for stormwater discharges from specific industrial activities to surface waters of the State. Facilities engaged in producing timber products (SIC 2411-2499) as the primary industrial activity, are specifically required to obtain permit coverage or a No-Exposure Certification, for discharges of stormwater associated with industrial activities from the facility to surface waters of the State.

A No-Exposure Certification may be obtained for facilities where all industrial materials and activities are protected by a storm-resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Due to the outdoor storage of materials as well as industrial activities being conducted outdoors, Pueblo Wood Products does not currently qualify for the No-Exposure Certification.

Corrective Action:

Within 45 days of receipt of this report, submit a permit application for the CDPS General Permit for Stormwater Discharges Associated with Non-Extractive Industrial Activity (COR900000). See attached Industrial Stormwater Permit Application Form. For assistance with the permit application or if you have any questions, please contact Mary Welch with CDPHE at mary.welch@state.co.us.

Finding 2: The concrete pad near the wash bay is sloped away from the bay (photo 109).

Recommendation: Ensure all wash water is captured in the bays when equipment is being washed down after logging activities.

Finding 3: Old rusting equipment and empty drums are stored along the northern end of the property (photo 112).

Recommendation: Ensure equipment that is no longer in use and empty drums are disposed of properly.