



Region 10 Enforcement and Compliance Assurance Division

1200 6th Avenue

Seattle, WA 98101

INSPECTION REPORT

Inspection Date:	05/24/2021	
Time:	Entry: 1:00 p.m.	Exit: 5:47 p.m.
Weather:	Periodic overcast with evidence of recent precipitation	
Media:	Clean Water Act (CWA)	
Regulatory Program:	CWA NPDES/Industrial Stormwater	
Permittee Name(s):	Darigold	
Permittee Addresses:	520 Albany Street	
Permittee City, State, Zip Code:	Caldwell, ID 83605	
Facility Name:	Darigold Caldwell Facility	
Facility Physical Location:	520 Albany Street	
	Latitude/Longitude	43.669277, -116.689050
City, State, Zip Code:	Caldwell, ID 83605	
Facility Contact(s):	Scott Algate, Senior Environmental Compliance Manager Phone: (208) 420-1193 Email: Scott.Algate@darigold.com	
County:	Canyon County, Idaho	
NPDES Permit:	2015 EPA Multi-Sector General Permit (MSGP)	
EPA Facility Identifier:	IDR053109	
Industrial Sector	MSGP Sector U – Food and Kindred Products	
Subsector	U-3	
Primary SIC Code(s)	2023 – Dry, Condensed and Evaporated Dairy Products 2021 – Creamery Butter	
Facility Receiving Water(s)	City of Caldwell Municipal Separate Storm Sewer System (MS4) to the Boise River	
Facility Receiving Water(s) Description:	MS4/River	
Inspector(s):		
Anthony D'Angelo – PG Environmental	U.S. EPA Contract Inspector (Lead Inspector)	(720) 789-8049
Signature: 		Date: 07/23/2021
Charissa Bujak – EPA Region 10	U.S. EPA Inspector	(208) 378-5754
Sarah Hansen	IDEQ Compliance Officer	(208) 373-0397
Jen Doughty	IDEQ Compliance Officer	(208) 799-4887

EPA Region 10 Recipient: Brian Levo	
Signature:	Date:

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Section I – Inspection Information

Purpose and Scope of the Inspection

On May 24, 2021, I, Anthony D'Angelo, a U.S. Environmental Protection Agency (EPA) Contract Inspector, along with U.S. EPA inspector Charissa Bujak (hereafter, we or Inspection Team) conducted an industrial stormwater inspection of the Darigold Caldwell Facility (hereafter, Permittee or Facility). We were accompanied by two compliance officers for the Idaho Department of Environmental Quality, Sarah Hansen and Jen Doughty. The purpose of the inspection was to determine compliance with the requirements of EPA's National Pollutant Discharge Elimination System (NPDES) 2015 Multi-Sector General Permit for Discharges of Stormwater Associated with Industrial Activities (hereinafter, the MSGP or Permit). The Permittee is authorized to discharge under the Permit under NPDES Permit No. IDR053109. The inspection consisted of two parts, a preliminary records review and a Facility walk-through. Inspection photographs from the Site walk-through are included in this report as Attachment A. Exhibits are included in this report as Attachment B. The Inspection Team requested a digital copy of the files reviewed during the inspection and performed a more thorough review after the onsite inspection.

Opening Conference

I provided a notice of inspection, via voicemail, to Mr. Scott Algate (Senior Environmental Compliance Manager, Darigold), on the morning prior to the inspection at approximately 10:00 a.m. I made contact via phone with Mr. Algate a short time later, and we agreed to meet at the Facility at 1:00 pm. Upon arriving at the Facility at 1:00 p.m., we met Mr. Algate near the Facility entrance, checked in, and proceeded to a conference room to discuss the inspection. Charissa Bujak and I presented our inspector credentials to Mr. Algate at that time. Mr. Algate explained that he is primarily responsible for NPDES compliance at the Facility and is responsible for conducting inspections and monitoring, training Facility staff, and reporting NPDES compliance data to EPA.

During the opening conference, we held brief discussions with Mr. Algate regarding the Facility's operations, industrial activities, compliance activities such as inspections and monitoring, employee training program, ongoing benchmark exceedances, corrective actions, and recordkeeping.

Additionally, during the opening conference, we verified that Permit-required records were maintained and requested the documentation be provided electronically for further review following the inspection. This electronic documentation was provided by Mr. Algate to the Inspection Team on June 1 and 2, 2021.

At the time of the inspection, the Facility was implementing its Stormwater Pollution Prevention Plan (SWPPP) dated October 2018. The Facility had already developed a revised SWPPP, dated February 2021, to meet the requirements of the 2021 MSGP which will be implemented upon issuance of the 2021 MSGP. Mr. Algate informed the Inspection Team that the Permittee had already submitted a Notice of Intent (NOI) to EPA for coverage under the 2021 MSGP.

Following the opening conference, we proceeded outdoors with Mr. Algate to conduct the Facility walk-through.

Facility Description

Darigold Caldwell Facility is a milk product processing plant in the City of Caldwell, ID ([refer to Photograph 1](#)). The Facility produces dry milk products and butter consistent with activities regulated under Sector U-3 and Standard Industrial Classification (SIC) Codes 2023 – Dry, Condensed and Evaporated Dairy Products, and 2021 – Creamery Butter. The Facility is located along three separate parcels on the north, south, and east sides of the intersection of N. 5th Ave. and Albany Street ([refer to Appendix B, Exhibits 1 and 2](#)). The northern parcel is used for storage, the southern parcel contains the Facility's main processing plant, and the eastern parcel includes the Facility's chemical storage area, wastewater equalization tank, and tanker loading/unloading building.

The Facility discharges stormwater through four (4) outfalls: Outfalls 001, 002, 005, and 006.

- Outfall 001 – Located at the northwest corner of the main processing plant ([refer to Photographs 2 through 4](#)).
- Outfall 002 – Located on the north side of the main processing plant ([refer to Photographs 5 through 9](#)).
- Outfall 005 – Located immediately north of the plant wastewater equalization tank ([refer to Photographs 10 and 11](#)).
- Outfall 006 – Located on the north side of the main processing plant directly south of the end of N. 6th Ave. ([refer to Photographs 12 through 14](#)).

Stormwater runoff discharged from the Facility is received by the City of Caldwell's Municipal Separate Storm Sewer System (MS4) and ultimately discharges to the Boise River. Historically, the Permittee had reported six outfalls at the Facility: Outfalls 001, 002, 003, 004, 005, and 006 (Outfall 006 reported as a substantially identical outfall). As noted during the previous 2018 EPA MSGP inspection of the Facility, Outfall 003 discharges to an onsite gravel infiltration bed and Outfall 004 was previously plugged ([refer to Photographs 15 and 16](#)). During the inspection, Mr. Algate explained that Outfall 006 was previously identified on the 2015 MSGP NOI as a substantially identical to Outfall 002; however, a reassessment conducted by the Permittee during the 2021 MSGP renewal determined that the outfall is not substantially identical to other outfalls. He added that that Outfall 006 has been identified on the 2021 MSGP NOI as an outfall that will be monitored during the next Permit term.

The lower section of the Boise River is designated as impaired for sediment, phosphorous, and fecal coliform bacteria. As required by Part 6.2.4, Discharges to Impaired Waters Monitoring, of the MSGP, Darigold is required to conduct quarterly benchmark monitoring for total suspended solids (TSS), total phosphorus (TP), and E. coli to meet target values identified in written notice from EPA Region 10 to the Permittee on December 4, 2015. It should be noted that Sector U-3 does not include any sector-specific benchmark monitoring requirements.

Additionally, the Facility is permitted to discharge evaporated condensate of whey ("COW" water) from its drying process to the Boise River (via the City of Caldwell MS4) under Permit No. ID0024953.

According to Mr. Algate, this water is discharged to the MS4 along Albany St. at a separate outfall than those identified on 2015 MSGP NOI (referred to as Outfall 001 in Permit No. ID0024953). Mr. Algate confirmed this discharge is not commingled with stormwater that is sampled for MSGP compliance.

Furthermore, the Facility is also authorized to discharge process wastewater to the City of Caldwell publicly owned treatment works (POTW) under a significant Industrial User Discharge Permit issued by the City. The Inspection Team noted three storm drains in the northwest portion of the Facility that ultimately discharge to the Facility's wastewater equalization tank and subsequently to the City's POTW (refer to Photograph 17).

Documents Requested During Inspection

Due to the ongoing COVID-19 pandemic, the Inspection Team confirmed Facility documentation to be available at the time of the inspection but did not review documentation in detail. The Inspection Team requested the following documents electronically for review following the onsite inspection. Note, the Inspection Team did not request duplicate copies of records that were previously provided by Darigold in 2020 in response to a Request for Information from EPA Region 10. Copies of the following documents requested during the inspection were provided by Mr. Algate following the inspection; documents used in support of observations made in this report are included in Appendix B, Exhibit Log and referenced where applicable.

- SWPPP, February 2021 (for 2021 MSGP)
- Employee training roster and topics covered, 2018, 2019, 2020
- MSGP Quarterly Visual Assessment Reports, Q4 2020 (both), Q1 2021
- Routine Inspection Reports, Q3 2020, Q4 2020, Q1 2021, Q2 2021
- Example roof inspection form
- Records/dates of quarterly roof washes, 2020, 2021
- Analytical laboratory results, chain of custodies, and monitoring reports for compliance sampling, Q3 2020, Q4 2020, Q1 2021
- Analytical laboratory results and chain of custodies for additional sampling conducted in response to benchmark exceedances, 2020

Section II – Observations

Following the opening conference, the Inspection Team and IDEQ compliance officers, accompanied by Mr. Algate, began the Facility walk-through at the northwestern corner of the Facility. At the time of the inspection, the weather was overcast, with temperatures in the 60s. We started the Facility walk-through at the outdoor portion of the Facility near the western corner of the main processing plant and abutting railroad tracks to the west. We observed three storm drains in this area which Mr. Algate confirmed discharge to the Facility's wastewater equalization tank. We proceeded on top of the roof of the main processing plant to observe the Facility's milk drying stacks, receiving vents, baghouses, and roof drainage. Next, we proceeded to the intersection of N. 5th Ave. and Albany St. to observe Outfall 001 at the northern corner of the main processing plant. From there, we proceeded southeast down Albany St. towards N. 7th Ave. observing drainage features along the eastern side of the main processing building including Outfalls 002 and 006. We then proceeded northwest, back up Albany St. and to the eastern parcel to observe Outfall 005, as well as the Facility's chemical storage area and wastewater equalization tank.

We concluded the Facility walk-through back at Outfall 001 at the intersection of N. 5th Ave. and Albany St.

For a list of areas of concern regarding the review of Permit-required documents and onsite Facility walk-through, refer to Section III, Areas of Concern.

Section III – Areas of Concern

The presentation of areas of concern does not constitute a formal compliance determination or violation. An area of concern is an observation that the Inspection Team made that may be inconsistent with the requirements of the Permit. The Inspection Team noted areas of concern in both the records review performed post-inspection and the onsite Facility walk-through.

1. Part 2.1.2 Non-Numeric Technology-Based Effluent Limits (BPT/BAT/BCT).

You must comply with the following non-numeric effluent limits (except where otherwise specified in Part 8) as well as any sector-specific non-numeric effluent limits in Part 8:

- 2.1.2.1 Minimize Exposure
- 2.1.2.2 Good Housekeeping
- 2.1.2.3 Maintenance
- 2.1.2.4 Spill Prevention and Response
- 2.1.2.8 Employee Training
- 2.1.2.9 Non-Stormwater Discharges
- 2.1.2.10 Dust Generation and Vehicle Tracking of Industrial Materials

Area of Concern 1

During the inspection, the Inspection Team observed Facility conditions that were not in accordance with the non-numeric effluent limits specified in the Permit or best management practices (BMPs) specified in the SWPPP.

- a. We observed evidence of a previous non-stormwater discharge to an offsite storm drain on the east side of the intersection of Albany St. and N. 6th Ave. The date, time, and source of the potential non-stormwater discharge was undetermined during the inspection. Specifically, we observed a white liquid (consistent with the appearance of milk) and a dried, white chalky material in the curb and gutter line of Albany St. Additionally, we observed a white liquid on the pavement and in the curb and gutter line of N. 6th Ave. Furthermore, we observed a white liquid accumulated in the catch basin on the east side of the intersection of Albany St. and N. 6th Ave. (refer to Photographs 18 through 25). Mr. Algate stated he was unaware of any recent spills or releases that may have occurred near this storm drain. Clean-up efforts at this location were not initiated during the inspection.
- b. We observed evidence of wash water from the Facility's tanker loading/unloading building in the curb and gutter line of Albany St. (refer to Photographs 26 through 28). It appeared that wash water track out from tanker truck traffic out of the building was

accumulating in the gutter on Albany St. adjacent to the building. The Inspection Team did not observe evidence of wash water to storm drains along Albany St. Section 1.4.6 of the SWPPP states “The inside of trailers are washed indoors in the main receiving building. All wash water is discharged to the Facility’s process waste water system.”

- c. We observed a powdery residue on the roof of the main processing building. Mr. Algate confirmed the residue to be milk powder released from the stacks and receiving vents associated with the Facility’s two milk dryers. We also observed that puddles of stormwater present on the roof near the stacks and receiving vents were cloudy and white (refer to Photographs 29 through 32). Mr. Algate confirmed that runoff from the roof around the milk dryer stacks and baghouses drains through downspouts that ultimately flow to Outfalls 001, 002, and 006. He added that a third-party vendor has been contracted to sweep and wash the roof of the main processing building quarterly (identified in Section 3.1.1 of the 2021 SWPPP). Following the inspection, Mr. Algate confirmed that the roof was last washed in March of 2021, as well as in September of 2020, but was not washed in Quarter 4 of 2020 due to safety concerns. When asked about disposal methods for roof wash water, Mr. Algate stated that he was unsure but that wash water is most likely allowed to flow down the building downspouts and discharge to the Facility’s outfalls.
- d. We observed accumulated sediment, grit, trash, and standing water at the Facility’s sample collection point for Outfall 002. Mr. Algate stated that samples for Outfall 002 are collected from the catch basin of a drain in a nearby loading dock. He explained that this drain gravity flows into an adjacent catch basin which he identified as Outfall 002 (refer to Photographs 7 through 9). Mr. Algate also stated that trash, grit, and standing water accumulation at this sample location is problematic and typically prohibits him from collecting a “clean sample.” The Maintenance of Stormwater Drainage and Treatment Systems section of the SWPPP (following Section 1.4.6 and before Section 1.4.7) states, “Stormwater drainage and treatment systems within the Facility are operated and maintained in such a manner to keep them functional and free of contamination.”
- e. We observed an uncovered, uncontained 55-gallon drum labeled only as “caustic” located upgradient of Outfall 005 (refer to Photographs 33). Another full 55-gallon drum observed immediately outside of the bulk chemical storage building (but within a contained area) was labeled with a blank hazardous waste label (refer to Photographs 34 and 35). Mr. Algate stated that he believed the label was added by mistake and that it was new sanitizing chemical like the others. Section 3.1.2, Good Housekeeping – Container Storage, states, “All containers are labeled to show the name and type of substance, stock number, expiration date, health hazards, suggestions for handling, and first aid information ("Right to Know" program).”

Additionally, we observed the empty 55-gallon drum storage area located in the eastern parcel of the Facility, upgradient of Outfall 005. One of the bung caps on an empty 55-

gallon drum of sulfuric acid was missing (refer to Photographs 36 and 37). Section 3.1.1 of the SWPPP states “Empty 55-gallon drums are rinsed indoors and recapped before they are stored outside.”

Following the inspection, on May 26, 2021, Mr. Algate emailed the Inspection Team informing us that the 55-gallon drums observed near the wastewater equalization tank and immediately outside the bulk chemical storage building had been moved inside the building, and that the missing bung cap had been replaced.

- f. We observed evidence of leaking fluid on the impervious surface around the trash compactor located immediately adjacent to Outfall 005. Specifically, absorbent material had been applied underneath the trash compactor and dark staining was observed on the impervious surface surrounding the compactor (refer to Photographs 38 and 39). Section 2.2, Spills and Leaks, of the SWPPP identifies the trash compactor as an area of the Facility where potential spills/leaks could occur; however, the Control Measures section of the SWPPP does not identify how spills/leaks in this location will be prevented or remediated.
- g. We observed that the Facility implements a stormwater training program for all onsite staff which is provided annually and includes general information about the MSGP as well as best management practices (BMPs) to be implemented by Facility staff. I asked Mr. Algate if the training program encompasses pest control as required for Sector U facilities. He explained that employee training does not cover pest control as all pest control management at the Facility is performed by a third-party vendor. As previously stated, we observed accumulated trash, most notably a significant amount of cigarette butts, at the Facility’s sample collection point for Outfall 002 (refer to Photographs 7 through 9). Section 4.5 of the SWPPP identifies that training encompasses good housekeeping and covers: “proper disposal locations.” Facility employees should be trained or retrained not to dispose of trash in the Facility’s stormwater system.

Additionally, we observed that while Mr. Algate is responsible for the majority of NPDES compliance at the Facility and is responsible for conducting employee training, there was not documentation available indicating that he himself had been trained in proper sample collection and data reporting procedures. As the Senior Environmental Compliance Manager for the Facility, Mr. Algate is more than likely qualified and trained to conduct these responsibilities; however, this training should be documented in the SWPPP.

2. Part 4.1 Conditions Requiring SWPPP Review and Revision to Ensure Effluent Limits are Met.

When any of the following conditions occur or are detected during an inspection, monitoring or other means, or EPA or the operator of the MS4 through which you discharge informs you that any of the following conditions have occurred, you must review and revise, as appropriate, your SWPPP (e.g., sources of pollution; spill and leak procedures; non-stormwater discharges; the

selection, design, installation and implementation of your control measures) so that this permit's effluent limits are met and pollutant discharges are minimized:

- An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this or another NPDES permit to a water of the U.S.) occurs at your facility.
- A discharge violates a numeric effluent limit listed in Table 2-1 and in your Part 8 sector-specific requirements.
- Your control measures are not stringent enough for the discharge to meet applicable water quality standards or the non-numeric effluent limits in this permit.
- A required control measure was never installed, was installed incorrectly, or not in accordance with Parts 2 and/or 8, or is not being properly operated or maintained.
- Whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).

Part 5.3 Required SWPPP Modifications.

You must modify your SWPPP based on the corrective actions and deadlines required under Part 4.3 and that you documented under Part 4.4. SWPPP modifications must be signed and dated in accordance with Appendix B, Subsection 11.

Area of Concern 2

During the inspection, the Inspection Team observed multiple instances where the Permittee, during routine quarterly inspections, indicated control measures are not stringent enough to meet the non-numeric effluent limits in the Permit. Specifically, a routine quarterly inspection conducted by Mr. Algate on September 10, 2020 identified a corrective action to "Clean powder residue from roof" (refer to Appendix B, Exhibit 3). No corrective action completion date was documented. Mr. Algate explained that milk powder deposited on the roof from the milk dryer stacks and receiving vents continues to be problematic in meeting benchmarks for TP, TSS, and E. coli. He explained that the Facility has implemented a corrective action to conduct monthly roof inspections and quarterly roof washes as a control measure for the milk powder product that accumulates on the roof. However, the 2018 SWPPP was not revised to show this corrective action (this is identified in Section 3.1.1 of the 2021 SWPPP). I asked Mr. Algate about the disposal practice for the wash water during the roof washing events. He stated that the washing is conducted by a third-party vendor is most likely allowed to drain down the roof downspouts and discharge to the Facility's outfalls. Following the inspection, Mr. Algate provided documentation to show the occurrence of these monthly roof inspections and quarterly roof washes. As previously stated, the roof was last washed in March of 2021, as well as in September of 2020, but was not washed in Quarter 4 of 2020 due to safety concerns.

Additionally, multiple quarterly visual assessments in 2019 and 2020 identified cloudy conditions and floating and settled solids in stormwater samples collected. Multiple visual assessment from 2019 and 2020 identify suspended solids that "resemble dust in the water" (refer to Exhibit 4). However, no SWPPP review or revision was documented for these instances.

3. Part 4.2 Conditions Requiring SWPPP Review to Determine if Modifications Are Necessary.

If any of the following conditions occur, you must review your SWPPP (e.g., sources of pollution, spill and leak procedures, non-stormwater discharges, selection, design, installation and implementation of your control measures) to determine if modifications are necessary to meet the effluent limits in this permit:

- Construction or a change in design, operation, or maintenance at your facility that significantly changes the nature of pollutants discharged in stormwater from your facility, or significantly increases the quantity of pollutants discharged.
- The average of four quarterly sampling results exceeds an applicable benchmark (see Part 6.2.1.2). If less than four benchmark samples have been taken, but the results are such that an exceedance of the four quarter average is mathematically certain (i.e., if the sum of quarterly sample results to date is more than four times the benchmark level) this is considered a benchmark exceedance, triggering this review.

Area of Concern 3

During the inspection, the Inspection Team noted that the Facility has consistently exceeded TP, TSS, and E. coli benchmarks every quarter during the Permit term. Mr. Algate stated that the milk powder deposition on the roof prohibits the Facility from achieving benchmark target values due to the powdery nature of the material, the phosphorus mineral content in the milk powder, and the powder's tendency to host bacteria growth when exposed to water and sunlight. As previously explained, the Facility has implemented corrective actions in response to these exceedances such as monthly roof inspections, quarterly roof washes, and additional stormwater monitoring; however, to date, these corrective actions have not resulted in TP, TSS, or E. coli from consistently dropping below benchmark level targets imposed on the Facility in response to impaired water monitoring requirements. At the time of the inspection, the 2018 SWPPP had not been revised to identify corrective actions implemented in response to the ongoing benchmark exceedances for TP, TSS, and E. coli. Additionally, the Inspection Team did not observe documentation that the SWPPP was reviewed following each instance of a benchmark exceedance.

Mr. Algate explained that as a corrective action, additional stormwater monitoring has been conducted at various locations throughout the Facility, primarily at roof downspouts, to better characterize the Facility's stormwater runoff upstream of where it is discharged through Outfall 001, 002, 005, and 006. Mr. Algate explained that this additional sampling conducted in quarters 3 and 4 in 2019 and all four quarters in 2020 has verified that stormwater runoff from the main processing building roof is consistently above benchmark values for TP, TSS, and E. coli at locations upstream of the outfalls (refer to Exhibit 5).

Mr. Algate also explained that the Permittee is currently evaluating the feasibility and options to retain and infiltrate all stormwater runoff onsite. However, Mr. Algate explained that this option would be resource intensive and require substantial construction modifications to the Facility, and as such, will not be implemented unless required by EPA.

4. Part 3.1 Routine Facility Inspections.

At least once each calendar year, the routine inspection must be conducted during a period when a stormwater discharge is occurring.

Area of Concern 4

The Inspection Team noted that none of the routine quarterly inspections conducted in 2019 and 2020 occurred during a period when a stormwater discharge was occurring. The Inspection Team also noted the Facility successfully conducted stormwater monitoring in 2019 and 2020 for both visual monitoring and benchmark monitoring; therefore, the Permittee should have been able to conduct at least one routine inspection during periods of discharge at least once per year in 2019 and 2020. Section 4.6.1 of the SWPPP states "At least once per year, the routine facility inspection will be conducted during a period when a stormwater discharge is occurring."

5. Part 6.1.1 Monitored Outfalls.

Applicable monitoring requirements apply to each outfall authorized by this permit, except as otherwise exempt from monitoring as a "substantially identical outfall."

Area of Concern 5

During the inspection, Mr. Algate stated that the Facility previously identified Outfall 006 on its 2015 MSGP NOI as substantially identical to Outfall 002, and therefore, had exempted the outfall from monitoring during the Permit term. However, he explained that the outfall was reassessed in 2020 during the 2021 MSGP NOI development and was determined not to be substantially identical due to its ability to receive spills from inside the main processing plant. Therefore, the Facility has included Outfall 006 as an outfall on its 2021 MSGP NOI. However, Facility conditions at this outfall had not changed since 2015; therefore, this outfall should have been monitored during the Permit term as it is not substantially identical to other outfalls that had been monitored during the Permit term (i.e., Outfalls 001, 002, and 005). Additionally, Section 2.2, Spills and Leaks, of the 2021 SWPPP does not identify the spill potential to Outfall 006 as identified by Mr. Algate during the inspection.

6. Part 6.1.2 Commingled Discharges.

If discharges authorized by this permit commingle with discharges not authorized under this permit, any required sampling of the authorized discharges must be performed at a point before they mix with other waste streams, to the extent practicable.

Area of Concern 6

The Inspection Team noted that stormwater discharges sampled at Outfall 001 are commingled with stormwater run-on from Albany Street at the point of collection, and therefore, are not

representative of the Facility's stormwater discharge. Mr. Algate explained that stormwater runoff from Albany Street enters a storm drain located southeast of the Outfall 001 storm drain where it is commingled in the pipe shared with the main processing building downspouts prior to entering the Outfall 001 storm drain catch basin. Mr. Algate explained he collects a grab sample from the pipe as it enters into the Outfall 001 storm drain catch basin (refer to Photographs 2 and 3). He explained that it is impossible to collect a sample at this location that is not commingled with stormwater run-on from Albany St. This was identified during the previous 2018 EPA inspection of the Facility. In response to this previous finding, the Permittee had informed EPA that they were in discussions with the City of Caldwell about modifying the drainage of Albany St. However, during the 2021 inspection, Mr. Algate stated that the Permittee is no longer working with the City to modify the drainage of Albany St. to prevent this run-on from occurring. At the time of the inspection, there did not appear to be a plan in place to ensure stormwater samples collected from Outfall 001 are representative and solely comprised of the Facility's discharge.

7. Part 5.2.2 Site Description

Part 5.2.2 of the Permit includes the requirements for the SWPPP site map.

Area of Concern 7

The Inspection Team noted that the site map included in the 2018 SWPPP did not identify all elements required by the Permit and was generally unreadable (refer to Appendix B, Exhibit 2). Specifically, the site maps do not identify:

- The onsite gravel infiltration bed used to infiltrate stormwater runoff from Outfall 003.
- The bulk chemical storage building near Outfall 005 as a chemical storage area.
- The locations where Outfall 005 connects to the City of Caldwell MS4.
- The City of Caldwell MS4 storm drain located to the east of the intersection of Albany St. and N. 6th Ave., as discussed in Area of Concern 1.a of this report
- Areas of loading/unloading and transfer areas for substances in bulk such as the tanker loading/unloading building and various loading bays for the main processing plant.

8. Part 5.2.1 Stormwater Pollution Prevention Team.

You must identify the staff members (by name or title) that comprise the facility's stormwater pollution prevention team as well as their individual responsibilities.

Area of Concern 8

The SWPPP identified the incorrect plant manager and signatory on the Facility's Stormwater Pollution Prevention Team; however, this was corrected onsite by Mr. Algate (refer to Photograph 40).

Section IV – Closing Conference

We held a closing conference at the conclusion of the inspection at approximately 5:33 p.m. During the closing conference, we clearly stated that this summary of observations (i.e., areas of concern) was “preliminary” and subject to addition, deletion, and/or modification. The summary of preliminary inspection observations and areas of concern were communicated with Mr. Scott Algate with Darigold.

- Area of Concern 1 – The Inspection Team observed Facility conditions that were not in accordance with the non-numeric effluent limits specified in the Permit.
- Area of Concern 2 – There were multiple instances where the Permittee documented in routine quarterly inspection reports that control measures were not stringent enough to meet the non-numeric effluent limits in the Permit; however, no subsequent corrective actions were documented.
- Area of Concern 3 – The Facility has consistently exceeded TP, TSS, and E. coli benchmarks every quarter during the Permit term.
- Area of Concern 4 – None of the routine quarterly inspections conducted in 2019 and 2020 occurred during a period when a stormwater discharge was occurring.
- Area of Concern 5 – Outfall 006 was not monitored during the Permit term as it was previously noted as being a substantially identical outfall; however, this was determined to be incorrect by the Permittee.
- Area of Concern 6 – Stormwater sampled at Outfall 001 is commingled with stormwater run-on from Albany Street at the point of collection, and therefore, is not representative of the Facility’s stormwater discharge.
- Area of Concern 7 – The site maps included in both the 2018 and 2021 SWPPPs did not identify all elements required by the Permit and were generally unclear.
- Area of Concern 8 – The SWPPP identified the incorrect plant manager and signatory on the Facility’s Stormwater Pollution Prevention Team; however, this was corrected onsite by Mr. Algate.

The closing conference concluded at approximately 5:47 p.m.

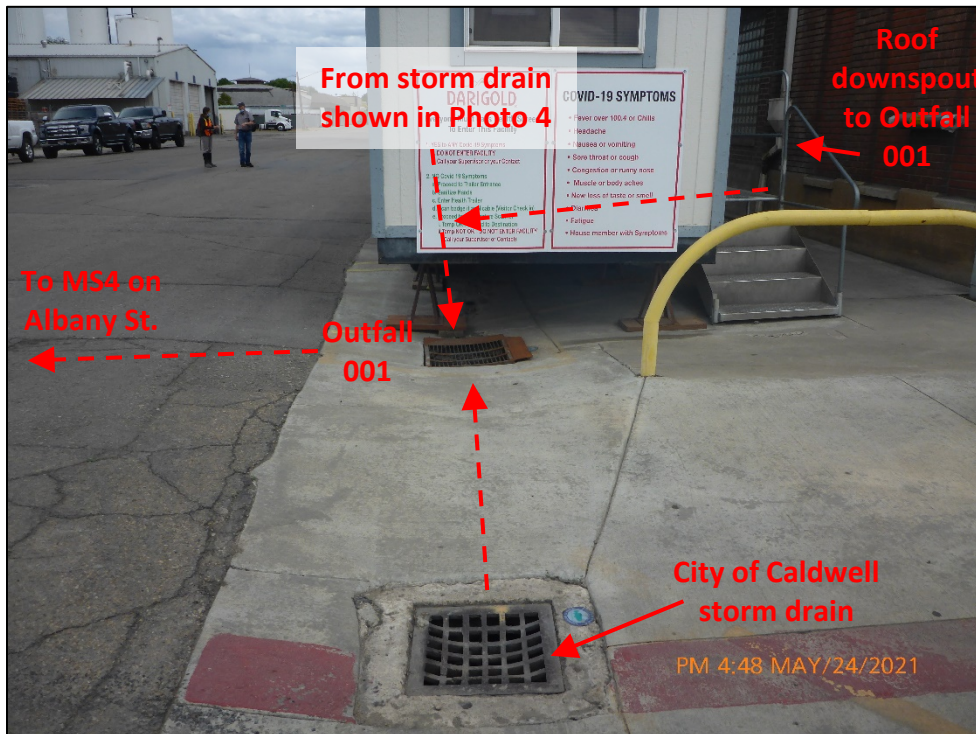
Attachment A – Photograph Log

The photographs were taken during the inspection on May 24, 2021 by Mr. Anthony D’Angelo, PG Environmental, U.S. EPA Contractor, using Panasonic Lumix DMC-TS6 digital camera. Original copies of the photos are on file.

Note: Photo time stamp shown in Eastern Daylight Time (EDT).



Photograph 1. View of main Facility entrance off N. 5th Ave.



Photograph 2. View of Outfall 001 and adjacent City of Caldwell MS4 storm drain. Note the City storm drain flows into the Facility's Outfall 001 storm drain catch basin via pipe before discharging into the MS4 along Albany St. The Outfall 001 storm drain also receives flow from an adjacent storm drain to the southeast and the building downspouts. Red arrows depict flow.



Photograph 3. View of the PVC pipe into the Outfall 001 storm drain catch basin where compliance samples for Outfall 001 are collected.



Photograph 4. View of a storm drain located southeast of Outfall 001 which receives stormwater runoff from the Facility and Albany St. This storm drain flows to Outfall 001 via the PVC pipe where Outfall 001 samples are collected.



Photograph 5. View of Outfall 002. A storm drain located in the loading bay in the background is the Facility's sample point for Outfall 002, shown in Photographs 7 through 9.



Photograph 6. Close-up view of Outfall 002.



Photograph 7. View, facing northwest, of the loading bay storm drain that flows to Outfall 002. Samples for Outfall 002 are collected from the catch basin of this loading bay storm drain.



Photograph 8. Close-up view of sediment, grit, trash, and cigarette butts accumulated around the loading bay storm drain (Outfall 002 sample point) shown in Photograph 7. Note the drain was labeled with a storm drain placard.



Photograph 9. View of the outlet pipe of the loading bay storm drain (Outfall 002 sample point).



Photograph 10. View of Outfall 005 located adjacent to the garbage compactor in the eastern parcel of the Facility. Note the rubber mat is used as a storm drain cover when the compactor is emptied.



Photograph 11. View of inside the catch basin of the Outfall 005 storm drain.



Photograph 12. View of the existing storm drain/outfall identified on the Facility's 2021 MSGP NOI as Outfall 006. Multiple inspection reports (starting with March 5, 2020 inspection) have identified a corrective action to berm this Facility entrance to prevent a spill of process water from inside the main production building from discharging to this storm drain; however, this corrective action had not been completed.



Photograph 13. View of a roof downspout that discharges to Outfall 006 shown in Photograph 12. Note the evidence of recent precipitation.



Photograph 14. View of the accumulated stormwater shown in Photograph 13. This portion of the Facility discharges to Outfall 006 shown in Photograph 12.



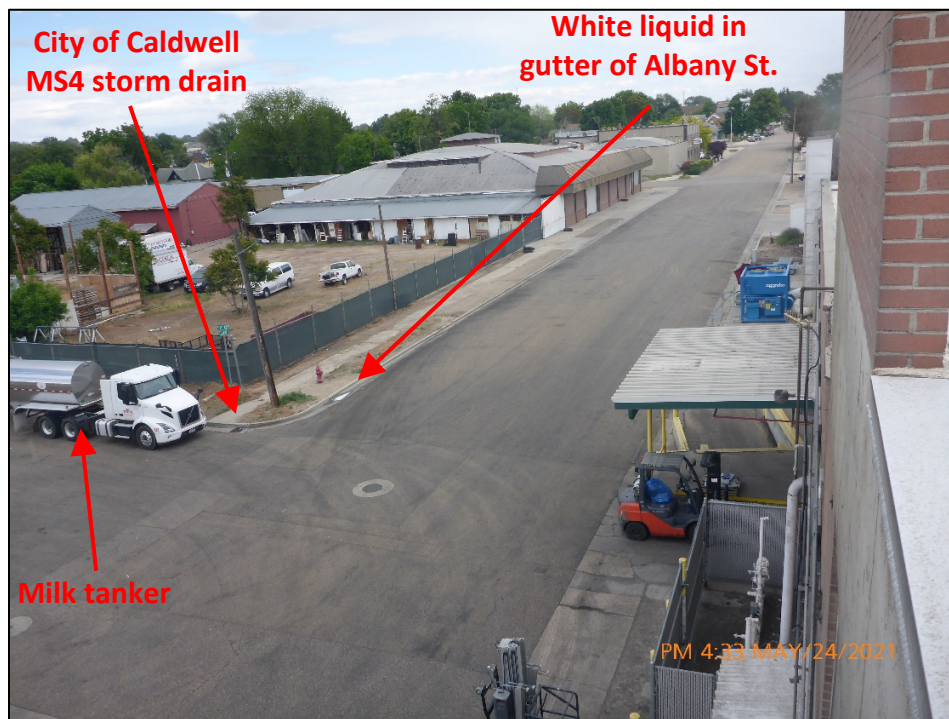
Photograph 15. View of the gravel infiltration bed which receives stormwater runoff from the adjacent loading bay storm drain (previously referred to by the Facility as Outfall 003).



Photograph 16. View of the storm drain in the loading bay which flows to the Facility's gravel infiltration bed, as shown in Photograph 15.



Photograph 17. View, facing southeast, of multiple storm drains along the southwestern side of the main production building that receive stormwater runoff and convey it to the Facility's wastewater treatment system. These are not identified on the SWPPP site maps.



Photograph 18. View, facing east from the main processing building rooftop, of the intersection of Albany St. and N. 6th Ave. Note the milk tanker truck and the storm drain and white liquid shown in Photographs 19 through 25.



Photograph 19. View, facing east, of a storm drain inlet at the east corner of Albany St. and N. 6th Ave. Note the white liquid in gutter line of Albany St. upgradient of storm drain inlet.



Photograph 20. View, facing northwest, of dried white, chalky material and greasy residue in gutter line of Albany St., upgradient of white liquid and storm drain shown in Photograph 19.



Photograph 21. Close-up view of white liquid in gutter line of Albany St. shown in Photographs 19 and 20. Also shown is dried white, chalky material and greasy residue in gutter line of Albany St., shown in Photograph 20.



Photograph 22. Additional view, facing northwest, of white liquid in gutter line of Albany St., upgradient of the storm drain at Albany St. and N. 6th Ave, shown in Photographs 19 through 21.



Photograph 23. View, facing southwest, of a white liquid in the gutter line of N. 6th Ave., upgradient of the storm drain inlet at the intersection of Albany St. and N. 6th Ave., shown in Photographs 19, 20, and 22. A milk tanker truck shown in Photo 18 is parked at this location.



Photograph 24. Close-up view of the storm drain inlet at Albany St. and N. 6th Ave. shown in Photographs 19, 20, 22, and 23. Note the trash in the grate inlet and the white liquid in the storm drain catch basin.



Photograph 25. Close-up view of white liquid in the catch basin of the storm drain at Albany St. and N. 6th Ave. shown in Photographs 19, 20, 22, 23, and 24.



Photograph 26. View, facing northeast from the main production building rooftop, of the milk tanker loading/unloading building on the northeast side of Albany St. (eastern parcel). Note the wash water track out and accumulated wash water in the gutter line of Albany St.



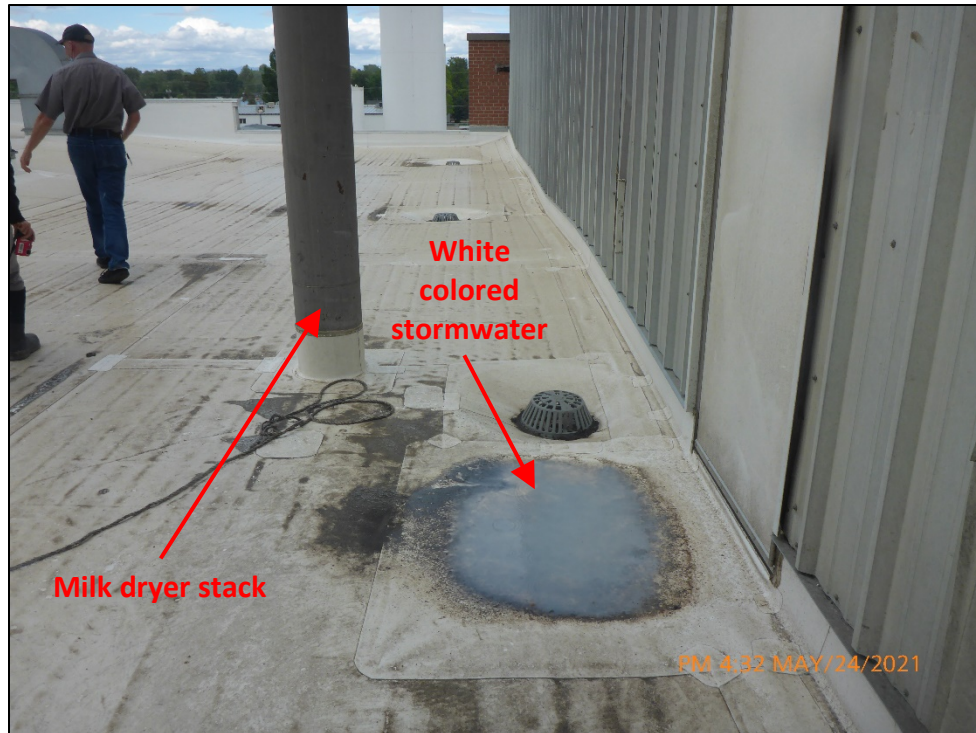
Photograph 27. Close-up view of the wash water in the gutter line of Albany St. as shown in Photograph 26.



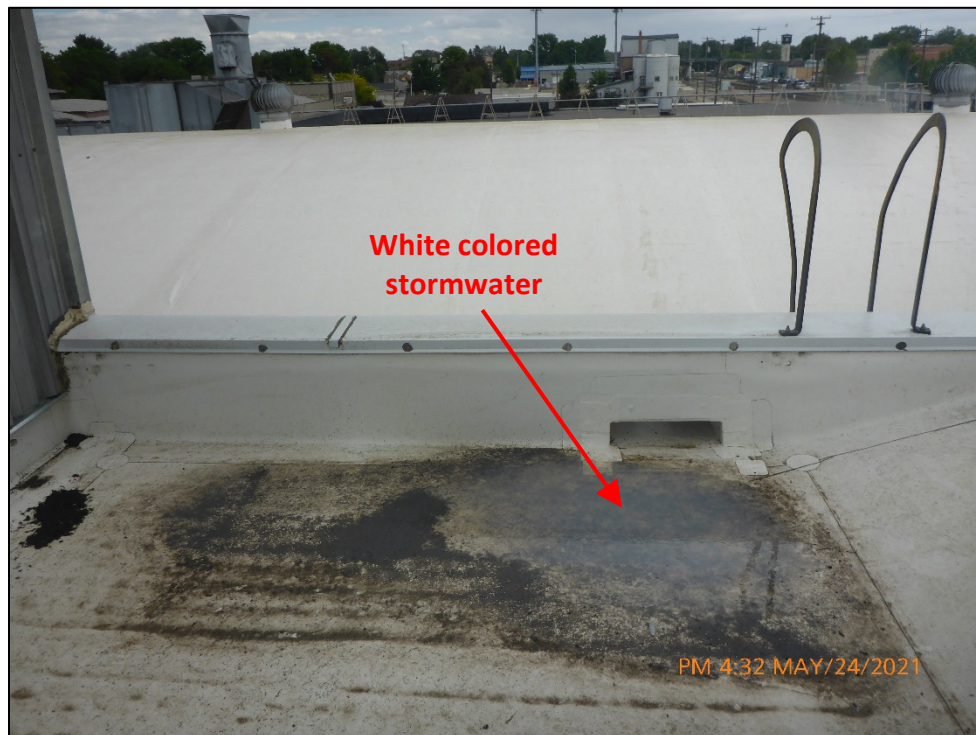
Photograph 28. Additional close-up view of the wash water in the gutter line of Albany St. as shown in Photographs 26 and 27.



Photograph 29. View of a stack that services one of the Facility's two milk dryers. Powdery residue accumulated on the roof was attributed to milk powder released from this stack, as well as other stacks and receiving vents in this portion of the main production plant roof.



Photograph 30. View of white-colored stormwater on the roof of the main production plant, adjacent to the stack shown in Photograph 29.



Photograph 31. View of white-colored stormwater on the roof of the main production plant, adjacent to the stack shown in Photograph 29.



Photograph 32. View of the roof of the main production building. Milk powder residue and dust was observed on the roof in this location.



Photograph 33. View of an uncovered, uncontained 55-gallon drum labeled as "caustic" located upgradient of Outfall 005.



Photograph 34. View of multiple 55-gallon drums of sanitizing chemical stored outside of the bulk chemical storage building in the eastern parcel. The drum on the left had a blank hazardous waste label, as depicted in Photograph 35.



Photograph 35. View of a hazardous waste label on one of the full 55-gallon drums shown in Photograph 34.



Photograph 36. View of empty 55-gallon drums stored outside near the wastewater treatment system and Outfall 005. Note one of the drums did not have a bung cap in place.



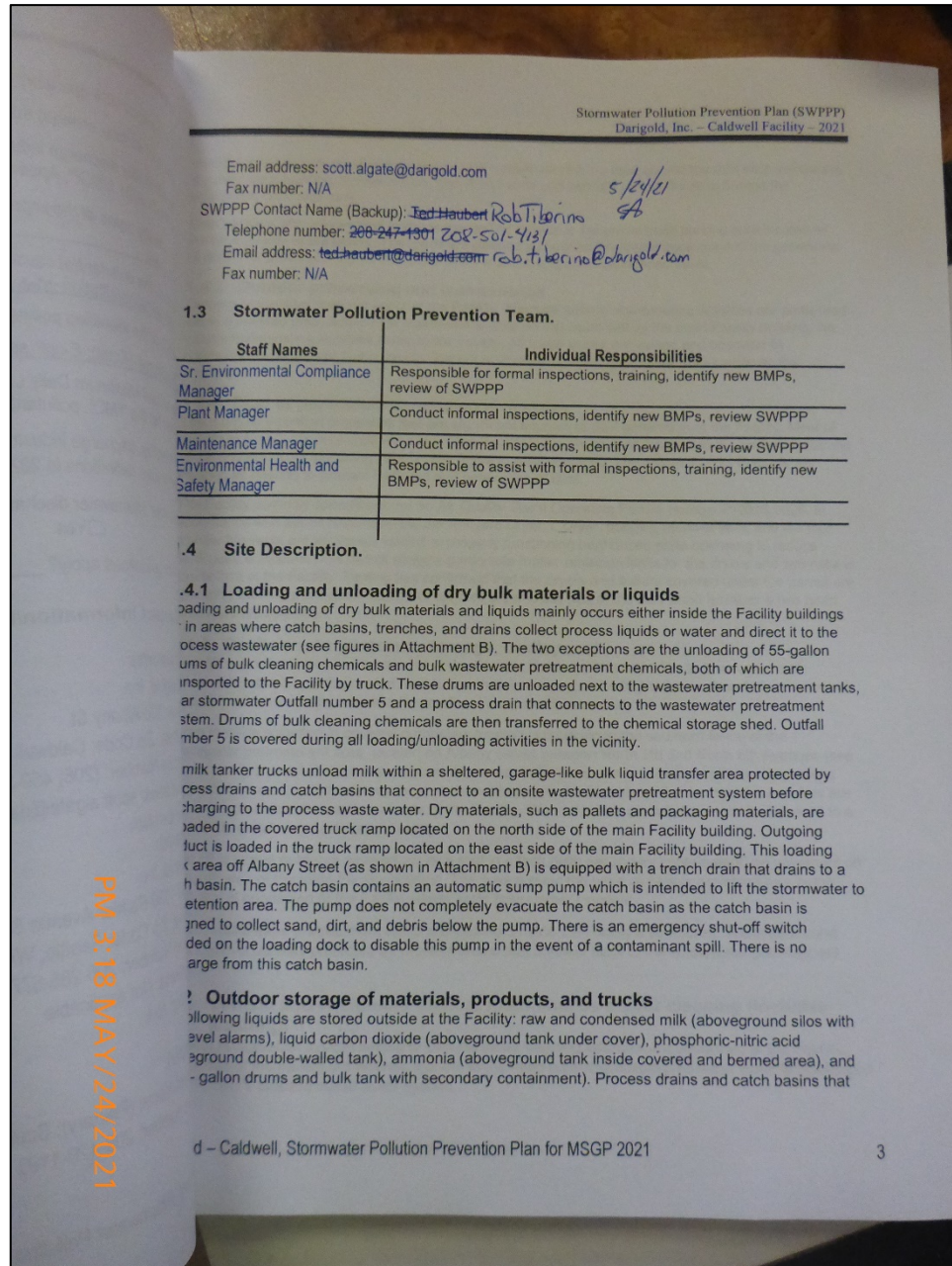
Photograph 37. Close-up view of the empty 55-gallon drum without a bung cap in place, as shown in Photograph 36.



Photograph 38. View of dark staining on the impervious surface under the Facility's trash compactor located immediately upgradient of Outfall 005, as shown in Photograph 10 and 33. Note the absorbent material that had previously been applied to fluid underneath the compactor but which had not been cleaned up at the time of the inspection.



Photograph 39. View, facing east, of dark staining on the impervious surface underneath the trash compactor upgradient of Outfall 005, shown in Photographs 10, 33, and 38.



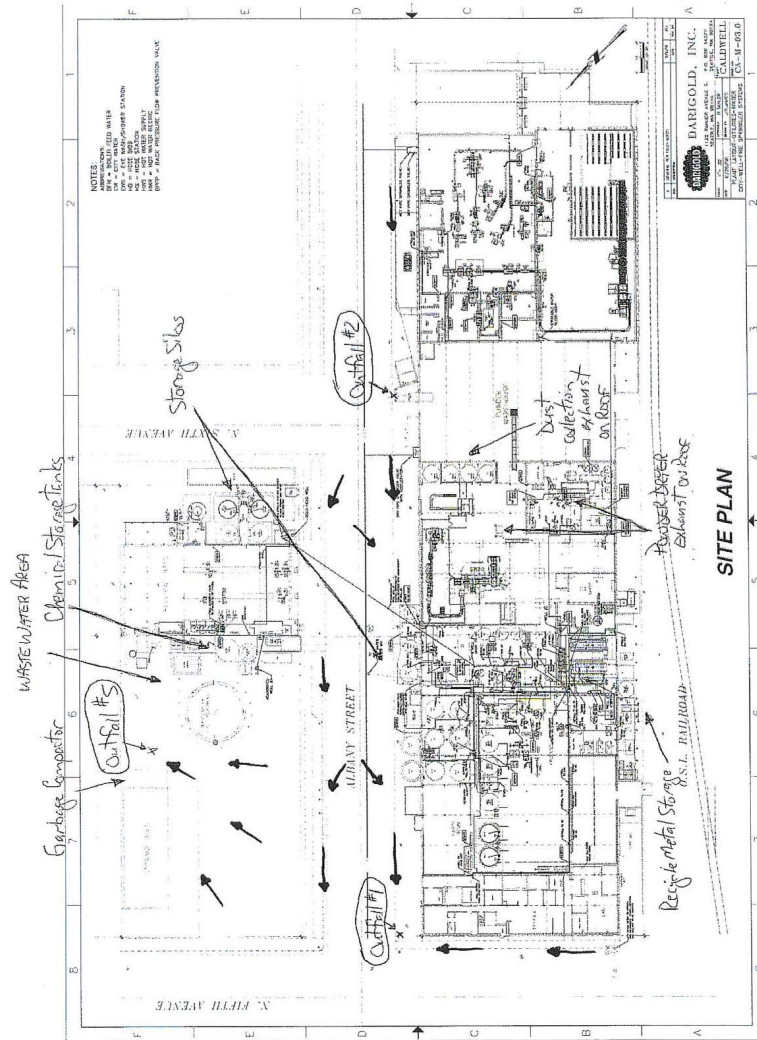
Photograph 40. View of SWPPP revisions made by Mr. Algate during the inspection.

Attachment B – Exhibit Log



Exhibit 1. Google Earth Pro image of the Facility (imagery date: 8/11/2017).

Stormwater Pollution Prevention Plan (SWPPP)
Darigold, Inc. – Caldwell Facility – 2015



Darigold – Caldwell, Stormwater Pollution Prevention Plan for MSGP 2015

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DARIGOLD-01409

Exhibit 2. 2018 SWPPP Site Map.

Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name	Darigold, Inc. – Caldwell		
NPDES Tracking No.	IDR05C425		
Date of Inspection	9/10/2020	Start/End Time	10:30/12:00
Inspector's Name(s)	Scott Algate		
Inspector's Title(s)	Sr. Environmental Compliance Manager		
Inspector's Contact Information	(208) 420-1193		
Inspector's Qualifications (if not part of Stormwater Pollution Prevention team)			
Weather Information			
Weather at time of this inspection?			
☒ Clear ☐ Cloudy ☐ Rain ☐ Sleet ☐ Fog ☐ Snow ☐ High Winds ☐ Other: Temperature:			
Have any previously unidentified discharges of pollutants occurred since the last inspection? ☐ Yes ☒ No If yes, describe:			
Are there any discharges occurring at the time of inspection? ☐ Yes ☒ No If yes, describe:			

Control Measures

- Carry a copy of site map with you during your inspections. Add any other structural control measures as necessary. This list will ensure that you are inspecting all required control measures at your facility.
- Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	Berm in front of chemical storage building.	☒ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
2		☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
3		☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	
4		☐ Yes ☐ No	☐ Maintenance ☐ Repair ☐ Replacement	

Stormwater Industrial Routine Facility Inspection Report

Exhibit 3. Page 1 of 5. Stormwater Industrial Routine Facility Inspection Report, dated September 10, 2020. This report identifies a corrective action to “clean powder residue from roof” (page 2).

Areas of Industrial Materials or Activities exposed to stormwater

Below are some general areas that should be assessed during routine inspections. Customize this list as needed for the specific types of industrial materials or activities at your facility.

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Outfall numbers 1,2, 5	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	
2	Area around trash compactor	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	
3	Roof area below powder stack	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	Clean powder residue from roof.  Remove bags containing scale, etc. from roof. 

Exhibit 3. Page 2 of 5. Stormwater Industrial Routine Facility Inspection Report, dated September 10, 2020. This report identifies a corrective action to “clean powder residue from roof” (page 2).

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
4	Waste oil storage area	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	Clean/remove oil or move back under roof, it is out from under cover and exposed to storm water. 
5	Covered maintenance area	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	
6	Scrap metal storage and staging locations	☒ Yes ☐ No ☐ N/A	☐ Yes ☒ No	Keep lids closed on metal recycle bins 

Stormwater Industrial Routine Facility Inspection Report

Exhibit 3. Page 3 of 5. Stormwater Industrial Routine Facility Inspection Report, dated September 10, 2020. This report identifies a corrective action to “clean powder residue from roof” (page 2).

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
7	Paved parking lot areas	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	Develop plan to keep gondola dumpster under cover or keep covered/tarped when not actively loading. 
8	Gravel parking lot area and the entrances/exits from paved roads	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	
9	All loading dock sumps/catch basins	☒ Yes ☐ No ☐ N/A	☒ Yes ☐ No	
10		☐ Yes ☐ No ☐ N/A	☐ Yes ☐ No	

Remember to look for the following while conducting the inspection!

- Corroded drums or drums without plugs or covers
- Corroded or damaged tanks, tank supports, and/or tank drain valves
- Torn bags exposed to rainwater
- Corroded or leaking pipes
- Debris or other excessive material in catch basins
- Leaking or improperly closed valves and valve fittings
- Leaking pumps and/or hose connections
- Broken or cracked dikes, walls, or other physical barriers designed to prevent stormwater from reaching stored materials
- Windblown dry chemicals/materials/products/dust

Stormwater Industrial Routine Facility Inspection Report

Exhibit 3. Page 4 of 5. Stormwater Industrial Routine Facility Inspection Report, dated September 10, 2020. This report identifies a corrective action to “clean powder residue from roof” (page 2).

Non-Compliance

Describe any incidents of non-compliance observed and not described above: (pictures associated with above listed items)



We need to move entrance to this SW manhole to the East and seal this opening. Remove the berm to allow process water from the building to flow to the process drain located to the West of this SW drain in the event there is a release from this door.

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection: N/A

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: Scott Algate – Sr. Env. Compliance Manager

Signature:  Date: 9/11/2020

Print name and title: Ted Haubert – Plant Manager

Signature: _____ Date: _____

Stormwater Industrial Routine Facility Inspection Report

Exhibit 3. Page 5 of 5. Stormwater Industrial Routine Facility Inspection Report, dated September 10, 2020. This report identifies a corrective action to "clean powder residue from roof" (page 2). Note the onsite copies of the inspection report reviewed during the inspection were signed by the Plant Manager.

MSGP Quarterly Visual Assessment Form (Complete a separate form for each outfall you assess)	
Name of Facility: Darigold, Inc. – Caldwell Plant	NPDES Tracking No. IDR053109
Outfall No: 1	
Person(s)/Title(s) collecting sample: Scott Algate/Environmental Manager	
Person(s)/Title(s) examining sample: Scott Algate/ Environmental Manager	
Date & Time Discharge Began: 05-14-20 11:50 AM	Date & Time Sample Collected: 05-14-20 12:00 PM
Date and Time Sample was Examined: 05-14-20 13:30 AM	
Substitute Sample? ☒ No ☐ Yes (identify quarter/year when sample was originally scheduled to be collected):	
Nature of Discharge: ☒ Rainfall ☐ Snowmelt	
If rainfall: Rainfall amount: <u>0.02 inches</u>	Previous storm ended > 72 hours before start of this storm? ☒ Yes ☐ No* (explain):
Parameter	
Color ☐ None ☒ Other (describe): Brown dirty color	
Odor ☐ None ☐ Musty ☐ Sewage ☐ Sulfur ☐ Sour ☒ Petroleum/Gas	
☐ Solvents ☐ Other (describe):	
Clarity ☐ Clear ☐ Slightly Cloudy ☒ Cloudy ☐ Opaque ☐ Other	
Floating Solids ☒ No ☐ Yes (describe):	
Settled Solids** ☒ No ☐ Yes (describe):	
Suspended Solids ☐ No ☒ Yes (describe): Slight amount	Resembles dust in the water
Foam (gently shake sample) ☐ No ☒ Yes (describe): Collapses and dissipates quickly	
Oil Sheen ☒ None ☐ Flecks ☐ Globs ☐ Sheen ☐ Slick	
☐ Other (describe):	
Other Obvious Indicators ☒ No ☐ Yes (describe):	
of Stormwater Pollution	
* The 72-hour interval can be waived when the previous storm did not yield a measurable discharge or if you are able to document (attach applicable documentation) that less than a 72-hour interval is representative of local storm events during the sampling period.	
** Observe for settled solids after allowing the sample to sit for approximately one-half hour.	
Detail any concerns, additional comments, descriptions of pictures taken, and any corrective actions taken below (attach additional sheets as necessary):	
Certification by Plant Manager or other Facility Responsible Official (Refer to MSGP Subpart 11 Appendix B for Signatory Requirements)	
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.	
A. Name: Scott Algate	B. Title: Sr. Environmental Compliance Manager
C. Signature: 	D. Date Signed: 6/11/20

Exhibit 4. MSGP Quarterly Visual Assessment Form for Outfall 001, May 14, 2020. Note the suspended solids description states “Resembles dust in the water”.

Darigold Caldwell Facility
Industrial Stormwater Inspection Report

Caldwell Stormwater Sampling Results History 2016-2020														
Parameter	Benchmark Value Target	Q1 2016 (Mar 11)			Q2 2016 (May 19)			Q3 2016 (Oct. 18)			Q4 2016 (Dec 15)			
		Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	
		Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	
Total P	0.1 mg/l May - Sept 0.35 mg/l Oct - Apr	0.8	0.81	0.85	0.83	1.17	1.22	0.6	0.78	0.6	0.64	0.78	0.78	
TSS	30 mg/l	28	28	28	28	21	21	21	21	21	28	28	21	
E. coli (velocisense in MPN/100 ml; lab does not run CFU/100 ml)	1246 Geometric Mean or 406 instantaneous cfu/100 ml	65	2	6	330	250	2400	810	2000	2	140	3	5	

Parameter	Benchmark Value Target	Q1 2017 (Feb 6)			Q2 2017 (Apr 24)			Q3 2017 (Sept 18)			Q4 2017 (Nov 20)		
		Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5
		Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result
Total P	0.1 mg/l May - Sept 0.35 mg/l Oct - Apr	0.86	0.86	1.02	0.93	1.87	0.69	1.2	0.28	1.04	1.28	0.75	0.87
TSS	30 mg/l	145	48	127	33	153	28	62	38	166	25	15	124
E. coli (velocisense in MPN/100 ml; lab does not run CFU/100 ml)	1246 Geometric Mean or 406 instantaneous cfu/100 ml	16	1	35	310	84	15	870	25400	170	370	29	1

Parameter	Benchmark Value Target	Q1 2018 (Jan 9)			Q2 2018 (Jun 18)			Q3 2018 (Oct 4)			Q4 2018 (Dec 18)		
		Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5
		Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result
Total P	0.1 mg/l May - Sept 0.35 mg/l Oct - Apr	4.5	1.85	2.3	0.73	0.72	0.78	1.8	3.27	2.74	0.47	0.4	0.28
TSS	30 mg/l	1240	365	222	27	18	44	30.8	202	25	18	115	25
E. coli (velocisense in MPN/100 ml; lab does not run CFU/100 ml)	1246 Geometric Mean or 406 instantaneous cfu/100 ml	68	326	57	8.8	420	11000	890	150	20	2000	890	30

Parameter	Benchmark Value Target	Q1 2019 (Feb 27)			Q2 2019 (Apr 5)			Q3 2019 (Oct 19)			Q4 2019 (Dec 12)			18 (Roof downspout by silo skove)	28 (Roof downspout W. of powder warehouse)	18 (Roof downspout by silo skove)	28 (Roof downspout W. of powder warehouse)	18 (Roof downspout by silo skove)	28 (Roof downspout W. of powder warehouse)
		Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5						
		Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result						
Total P	0.1 mg/l May - Sept 0.35 mg/l Oct - Apr	0.33	0.4	0.72	1.29	1.38	0.52	0.72	2.43	1.83	17.5	0.96	0.28	3.08	3.08	27.1	0.16		
TSS	30 mg/l	30	22	25	40	39	73	372	44	352	358	17	20	14	24	24	12		
E. coli (velocisense in MPN/100 ml; lab does not run CFU/100 ml)	1246 Geometric Mean or 406 instantaneous cfu/100 ml	61	6	4	280	39	1	40	3500	110	6500	5	2000	4400	210	7700	100		

Parameter	Benchmark Value Target	Q1 2020 (Jan 24)			Q2 2020 (5/14/20)			Q3 2020 - No discharge			Q4 2020 - Sample 1 (11/13)			Q4 2020 Sample 2 (12/17)			Q4 2020 Average			18 (Roof downspout by silo skove)	28 (Roof downspout W. of powder warehouse)	18 (Roof downspout by silo skove)	28 (Roof downspout W. of powder warehouse)																																																																																																																																																																																																																																																																																																																																																																																																																																																																																									
		18 (Roof downspout by silo skove)	28 (Roof downspout W. of powder warehouse)	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5																																																																																																																																																																																																																																																																																																																																																																																																																																																																																													
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Total P	0.1 mg/l May - Sept 0.35 mg/l Oct - Apr	0.67	2.08	0.8	19.6	0.46	0.77	11.6	2.24	0.53	2.35	6.4	6.75	87.2	2.23	1.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3.4	3

Inspection Date: May 24, 2021

Q1 2019 (Feb 27)		Q2 2019 (Apr 8)			Q3 2019 (Oct 19)					Q4 2019 (Dec 12)			
Outfall 2	Outfall 5	Outfall 1	Outfall 2	Outfall 5	Outfall 1	1B (Roof downspout by silo above)	Outfall 2	2B (Roof downspout W. of powder warehouse)	Outfall 5	Outfall 1	1B (Roof downspout by silo above)	Outfall 2	2B (Roof downspout W. of powder warehouse)
Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result
0.4	0.22	1.86	1.38	0.62	0.72	2.43	1.83	17.5	0.68	0.58	3.06	5.04	27.1
22	25	90	29	73	175	44	150	358	77	80	14	24	24
6	4	585	39	1	40	3300	110	6500	5	3300	4400	210	7700
Q1 2020 (Jan 24)					Q2 2020 (5/14/20)					Q3 2020 - No discharge Q4 2020 - Sample 1 (11/13)			
1B (Roof downspout by silo above)	Outfall 2	2B (Roof downspout W. of powder warehouse)	Outfall 5	Outfall 1	1B (Roof downspout by silo above)	Outfall 2	2B (Roof downspout W. of powder warehouse)	Outfall 5	Outfall 1	1B (Roof downspout by silo above)	Outfall 2	2B (Roof downspout W. of powder warehouse)	Outfall 5
Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result	Result
2.06	0.65	19.6	0.49	0.77	11.6	2.44	0.53	2.35	6.6	8.14	9.75	87.2	0.83
30	98	53	25	1.28	106	41	38	127	72	684	197	1370	113
24,000	220	120	10	60	>24,000	140	220	20	5300	13000	830	1200	2

Exhibit 5. Stormwater sampling results summary at the Facility from 2016-2020. The area denoted by the yellow box in the first image is shown in the second image and includes additional sampling results at various roof downspouts at the Facility that identifies benchmark exceedances in stormwater runoff sampled upgradient of the Facility's outfalls.