



NPDES Compliance Inspection Report

D. R. Johnson Lumber Co.

Riddle, OR

Permit # ORR221397

Inspection Date: January 26, 2021

Prepared by:

Rachel Stephenson

U.S. Environmental Protection Agency, Region 10

Enforcement and Compliance Assurance Division

Water Enforcement and Field Branch

Field, Data, and Drinking Water Enforcement Section

Inspector Signature/Date:

RACHEL STEPHENSON

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Digitally signed by RACHEL STEPHENSON
Date: 2021.03.05 11:02:48 -08'00'

Supervisor Signature/Date:

PETER CONTRERAS

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Date: 2021.03.08 22:37:55 -08'00'

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[Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Blankenship and Mr. Huffman; or from observations during the inspection.]

I. Facility Information

Facility Name:	D. R. Johnson Lumber Co.
Facility Owner/Operator:	D. R. Johnson Lumber Co.
Facility Contacts:	Valerie Johnson President Phone: (541) 874-2231 valeriejohnson@drjlumber.com Todd Blankenship Superintendent Phone: (541) 643-8934 ToddB@drjlumber.com Levi Huffman Engineer LeviH@drjlumber.com
Facility Location:	1991 Pruner Road Riddle, OR 97469
Lat/Long:	+42.95899°, -123.35792°
Mailing Address:	P.O. Box 66 Riddle, OR 97469
NPDES Permit Number:	ORR221397

II. Inspection Information

Inspection Date:	January 26, 2021
Inspectors:	Rachel Stephenson, Inspector EPA/R10/ ECAD/WEFB/FDDWES (206) 553-6366
Arrival Time:	10:30 AM
Departure Time:	1:00 PM
Weather Condition:	Overcast; Light Rain

Receiving Water: Cow Creek & Judd Creek (South Umpqua River)

Purpose: This inspection was conducted to document the facility's compliance with the National Pollutant Discharge Elimination System (NPDES), under the Oregon Department of Environmental Quality's 1200-Z Stormwater General Permit (Permit # ORR221397).

III. Permit Information

This facility is permitted under the Oregon Department of Environmental Quality's Stormwater General Permit (1200-Z) number ORR221397. The permit became effective on August 1, 2017; the expiration date is July 31, 2022.

This facility was last inspected by the U.S. Environmental Protection Agency (EPA) in June of 2018.

IV. Inspection Chronology

This was an announced inspection. The day before the inspection, I spoke with a facility representative over the phone; we discussed the logistics of the inspection and agreed upon a start time of 10:30 AM.

For this inspection, I operated as the lead inspector. I arrived at D.R. Johnson Lumber Co. at 10:30 AM on January 26, 2021. I met with Todd Blankenship and Levi Huffman in the site office. At this time, I identified myself as an EPA inspector and presented my credentials to them. We also exchanged business cards. I informed them that the purpose of the visit was to conduct a compliance inspection under the facility's NPDES Permit ORR221397 (henceforth, this will be referred to as the Permit). I was not denied access to the facility.

I conducted the opening conference with Mr. Blankenship and Mr. Huffman in the site office. The opening conference involved a discussion of the purpose and expectations of the inspection. Following the opening conference, a facility walk-through took place. At the conclusion of the walk-through, I conducted an in-depth file review in the site office. After the file review, I concluded the inspection with a closing conference to discuss observations and notes taken throughout the course of the inspection. I was accompanied throughout the inspection by Mr. Blankenship and Mr. Huffman. I left D.R. Johnson Lumber Co. at 1:00 PM.

V. Background and Activity

D.R. Johnson Lumber Co. (D.R. Johnson) is a log yard and lumber producing facility that was originally established in 1950. The company's subsidiary, Riddle Laminators, was acquired in the 1960s and currently produces laminated timber products on-site. D.R. Johnson Lumber Co. owns the approximately 87 acres of land on which D.R. Johnson and Riddle Laminators operate.

D.R. Johnson typically employs approximately 150 individuals, but recently has had to reduce the number of employees to 100-125 due to the impact of COVID-19. Mr. Blankenship began working for D.R. Johnson Lumber Co. in 2004. He's currently serving as the superintendent, but has operated in a variety of roles at the D.R. Johnson facility since 2009. He handles general management of the facility, along with stormwater monitoring and reporting. Mr. Huffman is an engineer that has been working at the facility for 3 ½ years. He oversees the more technical aspects of operation at D.R. Johnson.

Additional impacts of COVID-19 included a slow-down of operation, a decrease in business, and communication difficulties between on- and off-site personnel.

VI. Facility Review

D.R. Johnson is located in Riddle, OR, west of the South Umpqua River. See **Attachment A**, Aerial Map. According to the current Stormwater Pollution Control Plan (SWPCP), the facility encompasses 86.8 acres, 19.3 of which are paved.

D.R. Johnson is a lumber producing facility that includes a sawmill, log storage yard, log scale, log irrigation pond, planing mill, dry kilns, and product storage areas. The log yard and sawmill are located at the north end of the facility, bordered by a neighboring lumber facility called C & D Lumber. The planing mill, product storage areas, and Riddle Laminators are located at the south end of the facility. The Southern Pacific Railroad runs along the western edge of the southern section and then cuts across the middle of the northern section of the facility.

According to the current SWPCP, typical daily operation begins with logging trucks entering the site at the northeast corner of the property. The logs are weighed on the scale prior to storage in the log yard. The stored logs are periodically sprayed with water that is pumped from the nearby irrigation pond. Rough-sawn lumber is produced from these logs after they've been put through the sawmill. Due to issues with obtaining replacement parts, the sawmill was not operational at the time of the inspection.

The milled lumber is then transported to the planing mill towards the southern end of the facility. The planed lumber used to be dried in the dry kilns, but the curtailing of local power plants in 2007 resulted in the closure of the dry kilns. They have not been used since. The planed lumber is then trimmed to length and end-grain sealer is

applied. The finalized lumber products are then stacked, banded, and stored in the lumber yard or dry shed.

Riddle Laminators receives some of the planed lumber from the planing mill, glues the lumber together in multiple laminations, and produces structural beams of various dimensions. These finished beam products are stored in the lumber yard.

According to the Stormwater Pollution Control Plan (SWPCP), this facility contains 3 outfalls, which are referred to as Outfall 001, Outfall 002, and Outfall 003. Outfall 001 is located in the northeastern corner of the property, receives stormwater from the log scale and adjacent settling pond, and discharges stormwater into a drainage ditch along the southern side of Boyer Road. Outfall 002 is located next to the log irrigation pond by the sawmill and discharges stormwater to a ditch on the northern side of Boyer Road. Outfall 003 is located in the southeastern corner of the facility, receives stormwater runoff from the southern section of the facility, and discharges to a drainage ditch on the opposite side of Pruner Road. Stormwater is routed to Outfall 003 via a series of catch basins located throughout the paved areas of the facility.

Mandatory stormwater monitoring inspections are conducted on a monthly basis, along with informal weekly visual inspections. Mr. Blankenship informed us that he personally conducts these inspections every month. During the monthly inspections, he monitors stormwater discharge and maintains equipment as needed. He explained that all on-site employees are trained to observe and report any potential issues, so monitoring occurs beyond the monthly and weekly inspections. During the facility walk-through, I observed the implementation of several BMPs, including the use of waddles, straw bales, filtration socks, and absorbent booms. Mr. Blankenship conducts stormwater sampling at each of the outfalls four times per year (and after storm events). Total Suspended Solids (TSS), oil and grease (O&G), pH, zinc, copper, lead, chemical oxygen demand (COD), and biochemical oxygen demand (BOD) grab samples are taken at all three outfalls and shipped to a laboratory for analysis. UMPQUA Research Company of Myrtle Creek, OR handles the analysis of all stormwater samples for D.R. Johnson.

Mr. Blankenship prepares and submits discharge monitoring reports (DMRs) to ODEQ each monitoring year. There have been no benchmark exceedances reported over the past 5 years.

See **Attachment A**, which is an aerial map of the facility. See **Attachment B**, which is photographic documentation of the facility as seen during the site review.

VII. Records Review

The following documents were reviewed:

- Stormwater Pollution Control Plan (SWPCP) – A copy of the current revised SWPCP was on-site at the time of the inspection. The revised SWPCP, dated

October 2015, was prepared by Robert Goodfellow of Goodfellow Environmental & Geological Services, LLC. I conducted an in-depth review of the SWPCP during the inspection. An additional copy of the SWPCP was provided to me at the conclusion of the inspection.

- Current NPDES 1200-Z Stormwater General Permit – There was a copy of the permit on-site at the time of the inspection.
- Stormwater Sampling Logs and Analysis Records– There were sampling records, chain-of-custody forms, and laboratory analysis reports on-site at the time of the inspection.
- Monthly Inspection Reports – The Inspection Reports were on-site at the time of the inspection.
- Annual Stormwater Reports – There were copies of the Annual Stormwater Reports for the last 5 years at the time of the inspection. These were represented as annually submitted DMRs.

VIII. Areas of Concern

A. Representative Sampling – Potential 4th Outfall

Section B.2.b.vii. of the Permit states that, “The permit registrant shall, to the extent practicable, sample stormwater associated with industrial activity as it flows off-site before it combines with stormwater, wastewater or other waste streams from another facility or mixes with any surface water.”

During my review of the facility at the time of the inspection, I noted a drainage ditch that appeared to discharge stormwater directly off-site through a culvert to a drainage ditch on the northern side of Boyer Road (**See Attachment B, Photos 35 & 36**). This drainage ditch appears to receive stormwater run-off from the sawmill and maintenance shops area.

Mr. Blankenship stated that he had asked ODEQ about the ditch during their last inspection of the facility (July 7, 2015). He indicated that ODEQ had determined that stormwater monitoring and sampling was not required for the discharge point at the time of that inspection. He explained that he conducts visual monitoring of the ditch and associated discharge on an informal basis. Stormwater sampling is not currently conducted at this potential discharge point.

During the inspection, I explained the representative sampling requirements of the Permit to Mr. Blankenship and Mr. Huffman. I mentioned that they may be required to begin sampling and monitoring at this potential 4th outfall, to remain in compliance with their Permit. They both indicated that they would be willing and able to begin conducting stormwater monitoring at the discharge point as soon as required. I

explained that, should these changes be required, the appropriate revisions would also need to be made to the SWPCP.

B. Representative Sampling – Multiple Discharge Points

Section B.2.c. of the Permit states that, “Each discharge point must be monitored unless:

- ii. Discharge point has effluent that is substantially similar to the effluent(s) of a monitored discharge point and the same BMPs are implemented and maintained at the substantially similar discharge points or drainage areas that lead to the discharge points. Substantially similar effluent(s) are discharges from drainage areas serving comparable activities where the discharges are expected to be similar in composition. The determination of substantial similarity of effluent(s) must be based on past monitoring data or an analysis supporting that the discharge points are substantially similar. The supporting data or analysis must be included in the SWPCP. This provision does not apply to discharge point(s) covered by a numeric effluent limit.

During my facility walk-through, I noted that Outfall 003 is located and sampled at the end of a roadside drainage ditch that receives stormwater run-off from a series of small drains interspersed throughout the southern section. The areas where these drains receive stormwater run-off pertain to different industrial activities, which indicates that the effluents of each drain would not be considered substantially similar. (See **Attachment B, Photos 9-15, 18, 24**).

I explained the issue of comingling stormwater to Mr. Blankenship and Mr. Huffman during the inspection. I explained that taking stormwater samples at an outfall where stormwater from potentially different discharge points and associated effluents has comingled may not be an appropriately representative sample. They both indicated that they would be willing and able to sample at each drain’s discharge point, in addition to the final point at Outfall 003, as soon as required. I explained that, should these changes be required, the appropriate revisions would also need to be made to the SWPCP.

C. Good Housekeeping

Section A.1.g. of the Permit states that the Permittee must, “Routinely clean all exposed areas that may contribute pollutants to stormwater with measures such as sweeping at regular intervals, litter pick-up, keeping materials orderly and labeled, prompt clean-up of spills and leaks, proper maintenance of vehicles and stowing materials in appropriate containers.”

During my review of the facility, I noted the presence of a fair amount of litter and discarded items along the roadside ditch that ultimately contributes to Outfall 003. Mr. Blankenship picked up the trash that he could carry as we walked along the drainage ditch. I mentioned that regular litter pick-up was an important component of Good Housekeeping. He explained that he regularly picks up litter himself and instructs his employees to do the same when they see any, but that it’s difficult to

keep up with the sheer quantity of trash left behind by people who drive and walk on Pruner Road. I noted a similar issue with the drainage ditch leading to Outfall 001, alongside Boyer Road. He stated that he would put forth greater effort to exhibit Good Housekeeping following the inspection.

Section A.1.h. of the Permit states that the Permittee must, “Minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans that include methods for spill prevention and clean-up and notification procedures.”

During the inspection, I noticed a small amount of sheen at Outfall 001 (See **Attachment B, Photos 29 & 30**). Mr. Blankenship also noticed the sheen and immediately addressed it. He called one of his employees and instructed them to bring equipment over to clean up the sheen. They arrived within a few minutes and efficiently cleaned up the sheen. Mr. Blankenship and his employees demonstrated proper execution of O&G clean-up, the procedure for which I was able to locate within their current SWPCP. Mr. Blankenship also mentioned that they had been experiencing issues with truck waste coming off of Boyer Road. Boyer Road is a county road used by D.R. Johnson, C&D Lumber, and the public.

IX. Closing Conference

A closing conference was held with Mr. Blankenship and Mr. Huffman to discuss my inspection observations. I thanked them for their time and cooperation with the inspection. I left the facility at 1:00 PM.

ATTACHMENT A

Aerial Map



ATTACHMENT B

Photograph Log

All photographs taken by Rachel Stephenson on January 25,
2021 Nikon Coolpix AW120, Serial # 32057443

Photo Log – D.R. Johnson Lumber Co.

Photo #:01 (DSCN0493)

Description: Facing north, photo of storage area for milled lumber waiting to be sent to the planing mill.



Photo #:02 (DSCN0494)

Description: Facing southwest, photo of log storage area called the “hot deck”.



Photo #:03 (DSCN0495)

Description: Facing northwest, photo of pooled stormwater in yard near the beam loading area.



Photo #:04 (DSCN0496)

Description: Facing south, photo of planing mill.

Photo Log – D.R. Johnson Lumber Co.

Photo #:05 (DSCN0497)

Description: Facing southeast, photo of shavings bin for the planing mill.



Photo #:06 (DSCN0498)

Description: Facing south, photo of finished lumber products.



Photo #:07 (DSCN0499)

Description: Facing north, photo of Riddle Laminators building.



Photo #:08 (DSCN0500)

Description: Facing southwest, photo of finished lumber and structural beam products.

Photo Log – D.R. Johnson Lumber Co.



Photo #:09 (DSCN0501)

Description: Photo of a storm drain that contributes to the roadside drainage ditch leading to Outfall 003.



Photo #:10 (DSCN0502)

Description: Facing southwest, photo of the roadside drainage ditch leading to Outfall 003.



Photo #:11 (DSCN0503)

Description: Facing northeast, photo of one of the storm drains that contributes to the roadside drainage ditch leading to Outfall 003. This is the downspout of the drain from **Photo #9**.



Photo #:12 (DSCN0504)

Description: Facing southwest, photo of Outfall 003. Stormwater samples are taken here, at the mouth of the culvert. Outfall 003 is located at the end of the roadside drainage ditch along Pruner Road. Stormwater at Outfall 003 is discharged off-site to a roadside ditch on the opposite side of Pruner Road.

Photo Log – D.R. Johnson Lumber Co.

Photo #:13 (DSCN0505)

Description: Facing southeast, photo of a stormwater filter sock within the roadside drainage ditch leading to Outfall 003. Mr. Blankenship informed me that these socks are replaced each week.



Photo #:14 (DSCN0506)

Description: Facing northeast, photo of one of the storm drain downspouts that contribute to the roadside drainage ditch leading to Outfall 003. Note the filter socks at the entrance to the culvert that connects the drainage ditch under a service road.



Photo #:15 (DSCN0507)

Description: Photo of a storm drain that connects to the downspout in Photo #14.



Photo #:16 (DSCN0508)

Description: Photo of an old water meter for the City of Riddle. Catwalk present over roadside drainage ditch leading to Outfall 003.

Photo Log – D.R. Johnson Lumber Co.

Photo #:17 (DSCN0509)

Description: Facing northeast, photo of the roadside drainage ditch leading to Outfall 003. Old moss-covered pavement present along the edge, between the Pruner road and the ditch.



Photo #:18 (DSCN0510)

Description: Facing north, photo of one of the storm drain downspouts that contributes to the roadside drainage ditch leading to Outfall 003.



Photo #:19 (DSCN0511)

Description: Facing north, photo of the City of Riddle water valve for all of the on-site buildings.



Photo #:20 (DSCN0512)

Description: Facing northeast, photo of a culvert leading to a small settling ditch on the opposite side of Pruner road (land is owned by D.R. Johnson Lumber Co.). Note the litter present here.

Photo Log – D.R. Johnson Lumber Co.

Photo #:21 (DSCN0513)

Description: Facing southeast, photo of the settling ditch on the opposite side of Pruner Road. According to facility representatives, stormwater does not leave this ditch. The land is owned by D.R. Johnson Lumber Co. and is considered part of the facility.



Photo #:22 (DSCN0514)

Description: Facing northeast, photo of the starting point of the roadside drainage ditch leading to Outfall 003.



Photo #:23 (DSCN0515)

Description: Facing northeast, photo of the starting point of the roadside drainage ditch leading to Outfall 003. The ditch begins under the stairs of the office building.



Photo #:24 (DSCN0516)

Description: Facing north, photo of the starting point of the roadside drainage ditch leading to Outfall 003. The ditch begins under the stairs of the office building.

Photo Log – D.R. Johnson Lumber Co.

Photo #:25 (DSCN0517)

Description: Facing west, photo of the log scale, settling pond, and truck scale.



Photo #:26 (DSCN0518)

Description: Facing west, photo of the settling pond that drains into Outfall 001. The pond is cleaned out every other year.



Photo #:27 (DSCN0519)

Description: Facing northeast, photo of drainage ditch along Boyer Road that accepts water from Outfall 001. Note the litter present.



Photo #:28 (DSCN0520)

Description: Facing east, photo of the drainage ditch leading away from Outfall 001.

Photo Log – D.R. Johnson Lumber Co.

Photo #:29 (DSCN0521)

Description: Facing northwest, photo of Outfall 001 (black corrugated pipe on the left). Stormwater samples are taken here, at the spout. The rusted culvert pipe on the right contributes to the same drainage ditch, but is not owned by D.R. Johnson. Note the sheen present from Outfall 001. This was cleaned up during the inspection.



Photo #:30 (DSCN0522)

Description: Facing northwest, photo of Outfall 001 (black corrugated pipe on the left). Stormwater samples are taken here, at the spout. The culvert pipe on the right contributes to the same drainage ditch, but is not owned by D.R. Johnson. Note the sheen present from Outfall 001. This was cleaned up during the inspection.



Photo #:31 (DSCN0523)

Description: Facing north, photo of the drain contributing to the drainage ditch along Boyer Road. Note the filter sock, installed by D.R. Johnson. Mr. Blankenship informed me of truck waste issues contributing to the drainage ditches along Boyer Road.



Photo #:32 (DSCN0524)

Description: Facing east, photo of truck scale.

Photo Log – D.R. Johnson Lumber Co.

Photo #:33 (DSCN0525)

Description: Facing west, photo of sawmill. Due to parts issues, the sawmill was not operational at the time of the inspection. It had been out-of-service for a few days prior to the inspection.



Photo #:34 (DSCN0526)

Description: Facing east, photo of C&D Lumber stock piles along Boyer Road.



Photo #:35 (DSCN0527)

Description: Facing southwest, photo of drainage ditch that connects to a ditch on the north side of Boyer Road. Sampling is not currently conducted here, per ODEQ in 2015.



Photo #:36 (DSCN0528)

Description: Facing northeast, photo of the drainage ditch along Boyer that receives the stormwater from the unsampled D.R. Johnson drainage ditch.

Photo Log – D.R. Johnson Lumber Co.

Photo #:37 (DSCN0529)

Description: Facing west, photo of log irrigation pond. Water is pumped from this pond to be sprayed onto logs stored in the log yard.



Photo #:38 (DSCN0530)

Description: Facing northwest, photo of gate and catch basin. The water from the irrigation pond is routed to the catch basin prior to discharge from Outfall 002. Stormwater samples are taken here.



Photo #:39 (DSCN0531)

Description: Facing west, photo of pump system for irrigation pond. The log yard stormwater is routed back into the pond via the drains on the left.



Photo #:40 (DSCN0532)

Description: Facing south, photo of the sawmill.

Photo Log – D.R. Johnson Lumber Co.

Photo #:41 (DSCN0533)

Description: Facing north, photo of the drainage ditch that contributes to the unsampled potential discharge point. Stormwater from this ditch is connected to the unsampled ditch via the culvert under the service road.



Photo #:42 (DSCN0534)

Description: Facing southeast, photo of the propane tank near the maintenance shed and sawmill area.



Photo #:43 (DSCN0535)

Description: Facing southeast, photo of the double-walled gasoline tank used for refueling on-site equipment and vehicles. Log trucks are fueled off-site.



Photo #:44 (DSCN0536)

Description: Facing south, photo of double-walled diesel tank used for refueling on-site equipment and vehicles. Log trucks are fueled off-site.

Photo Log – D.R. Johnson Lumber Co.

Photo #:45 (DSCN0537)

Description: Facing northwest, photo of straw bale used as a BMP for pooling stormwater near Outfall 001.