



NPDES Compliance Inspection Report

Woodgrain Millwork Nampa, Idaho

NPDES Permit Tracking Number
IDR053086

Inspection Date: March 1, 2024

Prepared by:

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ATTACHMENT A - Aerial Image (EPA ArcGIS)

ATTACHMENT B - SWPPP Site Layout and Drainage Maps

ATTACHMENT C - Photograph Log

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Greg Wood or from observations made during the inspection and records review.]

I. Facility Information

Facility Name:	Woodgrain Millwork
Facility Address:	1201 West Karcher Road Nampa, Idaho 83687
Facility Operator:	Woodgrain Millwork 1201 West Karcher Road Nampa, Idaho 83687
Facility Owner:	Woodgrain – Doors Division 1201 West Karcher Road Nampa, ID 83687
Facility Contact(s):	Greg Wood Maintenance Manager gwood@woodgrain.com 208-447-9358
Latitude/Longitude:	N 43.604 W – 116.593
NPDES Tracking Number:	IDR053086
NAICS Code(s):	321911 (Wood Window and Door Manufacturing) 321918 (Other Millwork)
SIC Code(s):	2431 (Millwork)
Facility Size:	11 acres (6 acres exposed to stormwater)

II. Inspection Information

Inspection Date:	March 1, 2024
Inspector(s):	Vanessa Oquendo EPA Region 10, ECAD / SWES Charissa Bujak EPA Region 10 – IOO, ECAD/SWES

Karen Frazier
Idaho Department of Environmental Quality

Sheena Cannon
Idaho Department of Environmental Quality

Arrival Time: 10:00 AM
Departure Time: 3:30 PM

Weather: Mostly cloudy with sun break; windy; light afternoon rain

Purpose: To evaluate compliance with the requirements of the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities.

III. Permit Information

Woodgrain Millwork (hereinafter referred to as the “Facility”) is a wood moulding and door manufacturing facility. Woodgrain, Inc (Doors Division) owns the Facility’s property, and Woodgrain Millwork is the Facility operator and permittee under EPA’s Industrial Stormwater General Permit (MSGP). The permit tracking number assigned to the Facility is IDR053086.

The current version of the MSGP became effective on March 1, 2021 and is set to expire on February 28, 2026. The Facility had coverage under the previous version of the Permit (2015 MSGP). The Facility submitted a new Notice of Intent (NOI) for continued permit coverage on May 24, 2021.

Permitting authority was transferred from EPA Region 10 to Idaho Department of Environmental Quality (IDEQ) on July 1, 2021, as IDEQ became the delegated authority for General NPDES Stormwater Permits under Phase IV of the scheduled transfer.

The Facility is subject to the sector specific requirements of Part 8, Subpart A – Sector A, Subsector A4 of the MSGP (Wood Products Facilities not elsewhere classified). The requirements include quarterly standard benchmark monitoring for Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS). Due to the Facility’s discharge from Indian Creek to the Lower Boise River, the Facility is required to conduct additional quarterly impaired waters monitoring for Total Suspended Sediments, *E. coli*, Total Phosphorus, and temperature. Any exceedances in standard benchmark monitoring or impaired waters monitoring parameters would trigger Additional Implementation Measures (AIM).

IV. Facility Background

Woodgrain Millwork, Inc. is a wood moulding and door part production facility located

in Nampa, Idaho operated by Woodgrain (the parent company, sometimes also called “Woodgrain Doors”). The Facility generally operates Monday through Thursday with 119 employees in single shifts from 5:00AM to 3:30PM. Occasionally a small crew will work on a Friday. The site has been in operation since 1959, and Woodgrain bought the Facility in 1985.

The Facility encompasses approximately eleven acres with 6 acres exposed to stormwater. See **Attachment A**, Aerial Photo (EPA ArcGIS). The Facility is located along two main parcels separated by West Karcher Road. The northern parcel comprised the majority of the Facility and included a cyclone, various production warehouses, baghouses, chip bins, sawdust loading area, and outdoor material/equipment storage areas. Indian Creek, the Facility’s sole receiving water, flowed Northwest along the eastern boundary of the northern parcel. The southern parcel is primarily used for administration and excess raw material storage. An employee parking lot is located East of the northern parcel on the eastern side of Indian Creek. Impervious surfaces cover approximately 90% of the Facility. According to the Facility’s NOI and Mr. Wood, none of these impervious surfaces will be sealed or re-sealed with coal-tar sealcoat where industrial activities are located during coverage under the MSGP.

The primary Facility activity is wood door manufacturing. No sales occur at the Facility. Processes include lumber cutting, gluing, coping, moulding, drilling, sanding, drying, shaping, painting and other mechanical assembly. Once doors are produced, they are transported for sale. The Facility produces approximately 1,500 doors per week. All door manufacturing activity occurs indoors. Outdoor industrial activities include truck and forklift traffic and material storage. No chemical wood treatment takes place at the Facility. Any vehicle or equipment maintenance including cleaning and wash downs are conducted at the Facility’s self-contained bay. Maintenance wastewater and washwater are picked up and properly disposed of on demand by Master Rooter Plumbing. According to the Facility’s Stormwater Pollution Prevention Plan (SWPPP), the primary pollutant sources at the Facility are sawdust generation, vehicle traffic, loading and unloading activity, equipment and vehicle maintenance and cleaning, and outdoor material storage. The primary potential pollutants at the Facility include dust and oil and grease.

The Facility discharges stormwater to Indian Creek at multiple locations but has identified one single outfall as its compliance point, Outfall SW1, located on the central-east perimeter of the northern parcel. Outfall SW1 receives stormwater runoff from a single storm drain located in the center of the northern parcel. Mr. Wood stated this storm drain first passes through an onsite sand/oil separator before discharging through Outfall SW1 to Indian Creek. The Facility also has a stormwater retention basin on the northeastern part of the northern parcel that receives stormwater runoff in the northern part of the Facility through one storm drain. To the best of Mr. Wood’s knowledge, the retention basin has yet to discharge into Indian Creek.

The Facility was previously inspected by EPA on May 26, 2021 according to EPA’s Enforcement and Compliance History Online (ECHO).

V. Inspection Chronology

This was an announced inspection. On Wednesday February 28, 2024, I called the Facility and left a voicemail with Mr. Wood. I sent Mr. Wood a follow-up email the same day announcing the inspection. Mr. Wood responded to the email on the same day confirming his availability for the inspection at 10:00AM on March 1, 2024.

Upon arriving on-site, Ms. Karen Frazier (IDEQ), Ms. Sheena Cannon (IDEQ), Ms. Charissa Bujak (EPA) and I (hereafter, “We” or “Inspection Team”) made our way to the Facility’s main office through the parking lot where we met with Mr. Wood and began the inspection.

The inspection consisted of an opening conference, a walk-through of the Facility, a cursory records review, and ended with a closing conference. We were accompanied by Mr. Wood throughout the inspection.

VI. Opening Conference

Opening conference began at 10:00AM.

The opening conference was held with Mr. Wood shortly after our arrival. We had our initial introductions; we presented our inspector credentials to Mr. Wood and discussed the purpose and scope of the inspection. During the opening conference Mr. Wood provided a general background of the Facility operations, current staffing, and general stormwater management responsibilities. A brief review of some Facility records was also conducted during the opening conference.

VII. Site Review

The Inspection Team inspected both southern and northern parcels of the Facility making observations throughout the site walkthrough. See **Attachment B** for SWPPP site layout with drainage maps. As previously stated in this report, most of the Facility’s production activity occurred in the northern parcel whereas the southern parcel was primarily used for administration and excess raw material storage. See **Attachment C**, for a photograph log of photographs taken during the site walk-through.

We began the facility walkthrough with Mr. Wood starting at the Facility’s southern parcel. We exited the main administrative building and walked East along the northeastern side of the building off West Karcher Road. Mr. Wood pointed out a storm drain on the corner of West Karcher Road and Midland Boulevard in which he was unsure if it was technically on the Facility’s property or if it was part of the City of Nampa’s MS4 system (**Photo 1**). We observed sedimentation and debris leading into the storm drain (**Photo 1** and **Photo 2**). We were unable to determine where this storm drain discharged to while on site. We proceeded South along the southeastern perimeter of the Facility and along Midland Boulevard. We observed the Facility’s main fire system that is tested once a year (**Photo 3**). Fire system testing requires water to be drained out of the spout; this water has the potential to comingle with stormwater during a rain event

(**Photo 4**). As we continued South, we observed debris on the Facility grounds (**Photo 5**). Mr. Wood explained there were windy conditions in the past couple of days that may have brought debris and garbage into the Facility. We then observed the Facility's southern employee parking area behind Warehouse A (**Photo 6**). After the employee parking area, we observed the Facility's overflow lumber storage inside Warehouse A and then proceeded Northwest along the western perimeter of the Facility's southern parcel. We observed various materials stored outside along this perimeter as we walked Northwest (**Photo 7** and **Photo 8**). Mr. Wood explained the Facility was going through a transition period and the materials we observed were awaiting relocation within the Facility and were only being stored outside temporarily.

We proceeded North across West Karcher Road into the Facility's truck gate on the southwestern corner of the Facility's northern parcel where vehicle traffic enters and exits the Facility (**Photo 9** and **Photo 10**). We observed stormwater pooling just outside the truck gate and along empty glue container storage just inside the gate (**Photo 10**). We continued Northwest along the western perimeter of the Facility's northern parcel. We observed vehicle traffic corridors (**Photo 9** and **Photo 11**) and plastic debris on the ground (**Photo 12**). Mr. Wood explained there were windy conditions in the past couple of days that may have brought debris and garbage into the Facility. We also observed some of the Facility's scrap metal bins that are picked up and recycled or disposed of as needed by United Metal (**Photo 13**). The Facility had waste oil that is pumped out by Master Rooter and spent antifreeze tanks awaiting pick-up (**Photo 14**). We did not see any spill kits in the vicinity of the waste oil and spent antifreeze. We went inside the Facility's production building (Building 6) and observed the containers of waste paint and machinery washwater that is pumped out by a local waste vendor for proper offsite disposal (**Photo 15**). We then observed the "boneyard" of outdoor storage of various materials on impervious ground on the northwestern corner of the Facility (**Photo 16**). Stormwater in this area may not discharge to Indian Creek based on its location and drainage direction into another impervious area serving as an empty lot located directly East of the boneyard on the northeastern corner of the Facility. However, it appeared vehicle traffic occurred in the boneyard based on tire track presence (**Photo 16**).

As we made our way Southeast on the northeastern part of the Facility, we observed the Facility's stormwater retention basin that receives water from a pipe connected to a drain on the East side of the basin (**Photo 17**, **Photo 18**, and **Photo 19**). According to the Facility's SWPPP, the retention basin is designed to capture and contain the majority of stormwater onsite and retain up to the 25-year storm. The Facility is generally graded for sheet flow to drain to the retention pond. To the East of the retention basin, we observed some of the Facility's chip bins and immediate vehicle traffic corridor on the eastern perimeter (**Photo 20**). We walked to the western side of the Facility's sawdust loading bin and observed sawdust on the ground (**Photo 21**). The Facility utilizes a dust collection system consisting of routine sweeping, shoveling, and vacuuming around the loading area and baghouse. The Facility owns a sweeper truck and uses it as needed. Facility personnel inspect blowers and vacuums onsite on a weekly basis. Truckloads of sawdust are also taken offsite for disposal. Additionally, Facility personnel conduct weekly preventive maintenance inspections of their assigned areas to verify their areas are clean and orderly as part of general housekeeping practices.

We then returned to the eastern perimeter of the Facility and observed the Facility's berm along this perimeter's edge adjacent to Indian Creek (**Photo 22**). The berm diverts water to the Facility's retention pond including sheet flow from Buildings 5 and 6. Along the Facility's eastern perimeter during the site walkthrough, we observed two other discharge pipes into Indian Creek, one from a rooftop downspout and one unnamed open discharge pipe with a metal screen (**Photo 23**, **Photo 24**, **Photo 35**, and **Photo 36**). The unnamed discharge pipe was not identified in the Facility's SWPPP, and no active discharge was observed from it at the time of inspection. We also observed the Facility's compliance monitoring outfall (SW1) on the eastern perimeter that discharges stormwater into Indian Creek from a storm drain located in the central part of the Facility's northern parcel (**Photo 26** and **Photo 32**). Discharges through this outfall first pass through a sand and oil water separator. The discharge pipe for this outfall was slightly underwater (**Photo 26**). Mr. Wood indicated the pipe was underwater for most of the last quarter. Mr. Wood conducts sampling at this outfall by taking a grab sample using a lab supplied plastic container. Mr. Wood said he refrigerates the samples and drives them to Analytical Laboratories in Boise. Mr. Wood measures discharge temperature using a thermometer.

As we continued walking South along the Facility's eastern perimeter, we observed additional material temporarily stored outside (**Photo 25**), an uncovered dumpster (**Photo 27**), and a fuel tank located adjacent to the western bank of Indian Creek but inside the Facility's eastern perimeter berm (**Photo 28** and **Photo 29**). We did not see a spill kit in the vicinity of the fuel tank. We observed possible erosion from loose material from the Facility's eastern perimeter berm behind the fuel tank depicted in Photo 29 (**Photo 30**). Additional possible erosion and destabilization was observed adjacent to Indian Creek on the Facility's eastern perimeter near a gated path leading to the Facility's eastern parking area (**Photo 31**). Mr. Wood explained that small mammals called rock chucks may be digging holes or burrowing at the Facility and may be causing the possible destabilization, but he hasn't had issues with erosion or destabilization at the Facility.

We turned to the Southwest to observe the industrial area in the central part of the Facility where we observed the SW1 outfall storm drain, portable toilets, and fire house (**Photo 32** and **Photo 33**). We walked Southeast through the central part of the Facility, stopped in Building 5 to briefly observe the door trimming process, and then headed to the southeastern area of the Facility's eastern perimeter in the northern parcel. In this area, we observed another unnamed pipe that may or may not discharge into Indian Creek (**Photo 34**), but the source of potential discharge was unknown to Mr. Wood. There was no active discharge coming from this pipe at the time of inspection. On the southeastern exterior side of Building 3, we also observed a diesel storage tank with secondary containment that did not have proper and legible National Fire Protection Association (NFPA) hazard warning labeling (**Photo 39**). We did not see any spill kits in the vicinity of this diesel storage tank. We then crossed a small bridge into the eastern employee parking area and headed back to the main administrative building in the Facility's southern parcel. Along the way, we observed additional debris along the western bank of Indian Creek behind the Facility's break room (**Photo 40**). Mr. Wood explained there were windy conditions in the past couple of days that may have brought debris and garbage into the Facility. We did not see the required public sign illustrating

facility permit coverage during the site walkthrough nor upon returning to the Facility's administrative building (**Photo 37**). When I asked Mr. Wood about the sign, he indicated the Facility did not have one.

VIII. File Review

The following documents were reviewed as part of this inspection, some of which were reviewed offsite post-inspection:

- Multi-Sector General Permit – The Facility had the most current permit (2021 MSGP) on site.
- Notice of Intent (NOI) – The Facility's most recent NOI was reviewed prior to the inspection. It was certified by Mr. Hugo Castillo on 05/24/2021.
- Annual Reports – Prior to the inspection, permit required annual reports were reviewed. Years reviewed included 2021, 2022, and 2023. The 2021 annual report was submitted late on 3/11/22 according to EPA's Integrated Compliance Information System (ICIS) with due date of 1/30/22, but all annual reports contained routine inspection and quarterly visual assessment dates and summarized corrective actions.
- Stormwater Pollution Prevention Plan (SWPPP) – A cursory review of the Facility's SWPPP was conducted during the opening conference. The SWPPP was certified and signed by Mr. Wood on 11/1/23 (**Photo 38**). A copy of the SWPPP was requested for offsite review post-inspection. Mr. Wood submitted an electronic copy of the SWPPP (dated February 2023) via email on 3/13/24. Of note: The Facility had a Spill Pollution Control and Countermeasures Plan (SPCC) given the amount of fuel and oil stored on site. The SPCC was not reviewed as part of this inspection, however it was electronically submitted as part of the SWPPP.
 - Site Map Deficiencies:
 - Missing size of property in acres (Part 6.2.2.3.a)
 - Missing locations of stormwater conveyances (unnamed pipes) per Part 6.2.2.3.f
 - Missing locations for storage or disposal of wastes (Part 6.2.2.3.m.iv)
 - Missing COD, phosphorus, *E.coli* as pollutants discharged from facility – because the facility is monitoring for these pollutants (Part 6.2.3.2)
 - Missing schedule or frequency for maintaining all control measures used to comply with effluent limits such as how often the eastern perimeter berm is maintained (Part 6.2.5.1.b)
 - Missing sampling frequency (Part 6.2.5.3.b.ii) and missing laboratory used (Part 6.2.5.3.b.v)
- Site Inspection Reports – I reviewed quarterly site inspection reports for 2021 – 2023 offsite and post-inspection. Mr. Wood submitted completed quarterly site inspection forms for 2021 – 2023 via email on 3/15/24. All required quarterly site inspections were performed and information documented on the forms comported with permit requirements.

- Quarterly Visual Assessment Documentation – I reviewed the Facility’s completed visual observation records from 2021 through 2023 offsite and post-inspection. Mr. Wood submitted these records to me via email on 3/15/24 and explained any missing quarterly visual assessment was due to no storm event or the outfall was underwater. I found the documentation to be adequate. However, some of the documentation indicated presence of solids and it is not clear if corrective actions were taken, except for the brief summaries in annual reports, to address those observations such as SWPPP review and revision as required in Parts 3.2.2.5 and 5.1.1.5 of the permit. Additionally, Part 3.2.4.2 of the permit indicates that a facility may distribute quarterly visual assessments during seasons when precipitation more regularly occurs, so the Facility may conduct the assessments during the time of year there is more rain rather than not conduct them during a dry time of year.
- Quarterly Stormwater Monitoring Results – Post inspection, I reviewed the Facility’s quarterly discharge monitoring reports (DMRs) from 2021 – present that were emailed to me on 3/13/24. I reviewed analytical lab reports (also submitted to me post-inspection on 3/13/24) and compared the analytical report values to the reported DMR values. EPA’s online database indicated non-receipt DMR violations for the failure to submit benchmark and impaired waters monitoring in Quarter 3 and Quarter 4 of 2023. The database also indicated late DMR submittal violations for benchmark and impaired waters monitoring in Quarter 1 and Quarter 3 of 2021.

The review of the DMRs identified sector specific benchmark exceedances during the following quarters that would have triggered additional implementation measures (AIM) due to single sample results exceeding the benchmark thresholds by more than four times for the parameters:

- Quarter 2 of 2021 for *E.coli* with a reported geometric mean value of 17,000 (#/100ml) with a limit of 126 (#/100ml) and for total suspended solids with a reported value of 1,350mg/L with a limit of 33mg/L (based on a laboratory report dated 6/1/21 that could not be matched with a Quarter 2 of 2021 DMR possibly due to lapse in reporting requirements between the 2015 and 2021 MSGPs or challenges with reporting when IDEQ was delegated authority over the NPDES program and this permit on July 1, 2021)
- Quarter 4 of 2021 for *E.coli* with a reported geometric mean value of 820 (#/100ml) with a limit of 126 (#/100ml)
- Quarter 1 of 2022 for total suspended solids with a reported value of 174 mg/L with a limit of 33mg/L
- Quarter 4 of 2022 for total suspended solids with a reported value of 457 mg/L with a limit of 33mg/L
- Quarter 2 of 2023 for *E.coli* with a reported geometric mean value of 16,000 (#/100ml) with a limit of 126 (#/100ml)

The Facility would have been required to document corrective actions and AIM and implement any necessary modifications or control measures within 14 days of receipt of laboratory results per Part 5.2 of the permit.

IX. Areas of Concern

Observations during the inspection and records review identified the following areas of concern:

A. Representative Sampling

Section 4.1 of the 2021 MSGP describes the monitoring procedures that are required of each discharge point. Section 4.1.1 of the permit states that “applicable monitoring requirements apply to each discharge point...”

Additionally, Appendix B.10.A of the permit states that “samples and measurements taken for the purpose of monitoring must be representative of the volume and nature of the monitored activity.”

The Facility’s sole monitoring and discharge point at Outfall SW1 is underwater during part of the year when the level of Indian Creek is higher. Sampling discharge from the outfall while it is underwater may be comingled with Indian Creek water and subsequently may not be representative of the outfall’s discharge.

B. Good Housekeeping

Section 2.1.2.2 of the 2021 MSGP states that you must “keep clean all exposed areas that are potential sources of pollutants. You must perform good housekeeping measures in order to minimize pollutant discharges...”

Additionally, Section 2.1.2.2.c states that dumpsters that do not have lids and could leak, and “ensure that discharges have a control (e.g., secondary containment)”.

During the inspection we observed some debris and garbage in different areas of the Facility grounds including near the Indian Creek bank. Mr. Wood explained there were windy conditions in the past couple of days that may have brought debris and garbage into the Facility. A large garbage dumpster without a lid and otherwise uncovered also was observed at the Facility.

C. Offsite Tracking

Section 2.1.2.2 of the 2021 MSGP states that you must “minimize generation of dust and off-site tracking of raw, final, or waste materials in order to minimize pollutants discharged via stormwater.” Additionally, Section 3.1.3.3 states that you must look out for “offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site.”

During the inspection, we observed stormwater pooling just outside the Facility’s main truck gate where vehicle traffic enters and exits that can lead to offsite tracking of sediment from vehicles.

D. Unidentified/Unmonitored Outfalls

Section 4.1.1 of the 2021 MSGP states that “applicable monitoring requirements apply to each discharge point authorized by this permit, except as otherwise exempt from monitoring as a ‘substantially identical discharge point’ (SIDP); if your facility has two or more discharge points that you believe discharge substantially identical stormwater effluents, based on the similarities of the general industrial activities and control measures, exposed materials that may significantly contribute pollutants to stormwater, and runoff coefficients of their drainage areas, you may monitor the effluent of just one of the discharge points and report that the results also apply to the SIDP(s). As required in Part 6.2.5.3, your SWPPP must identify each discharge point authorized by this permit and describe the rationale for any SIDP determinations.”

Additionally, Appendix B.10.A of the permit states that “samples and measurements taken for the purpose of monitoring must be representative of the volume and nature of the monitored activity.”

The Facility’s stormwater sample collection location, Outfall SW1, is not representative of all industrial activities conducted at the Facility. The Inspection Team observed three other discharge points along the eastern perimeter of the northern parcel that were not identified in the Facility’s SWPPP: one that discharged from a rooftop spout, one unnamed open discharge pipe with a metal screen, and another unnamed discharge pipe in which its source or discharge origin was unknown. No active discharges were observed from those other outfalls. Stormwater runoff and discharge through these other outfalls may come into contact with different industrial activities at the Facility compared to the industrial activity stormwater is exposed to and discharged from the monitored Outfall SW1.

Additionally, we observed a storm drain just outside the Facility’s main administrative building in the southern parcel in which Mr. Wood did not know if it belonged to the City of Nampa or if it belonged to the Facility. According to the Facility’s SWPPP site map, it appeared the drain was marked as belonging to the City of Nampa sewer system.

E. Failure to Monitor and/or Failure to Submit DMRs

Section 4.2. of the 2021 MSGP describes the monitoring requirements that may be applicable to “each discharge point,” including indicator monitoring and benchmark monitoring, and impaired waters monitoring. Applicable monitoring data, including reporting “no discharge” for a given quarter must be submitted to EPA/IDEQ in the form of a Discharge Monitoring Report (DMR).

EPA’s online database indicated non-receipt DMR violations for the Facility for failure to submit benchmark and impaired waters monitoring in Quarter 3 and Quarter 4 of 2023. The database also indicated late DMR submittal violations for the Facility for benchmark and impaired waters monitoring in Quarter 1 and Quarter 3 of 2021.

F. Outdoor Storage and Minimizing Exposure

Section 2.1.2.1 of the 2021 MSGP states that you must “minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and stormwater in order to minimize pollutant discharges by either locating these industrial materials and activities inside or protecting them with storm resistant coverings.”

During the inspection, we observed various materials stored outside along the western perimeter of the Facility’s southern parcel. Mr. Wood explained the Facility was going through a transition period and the materials we observed were awaiting relocation within the Facility and were only being stored outside temporarily.

We also observed the “boneyard” of outdoor storage of various materials on impervious ground on the northwestern corner of the Facility. Stormwater in this area may not discharge to Indian Creek based on its location and drainage direction into another impervious area serving as an empty lot located directly East of the boneyard on the northeastern corner of the Facility. However, it appeared vehicle traffic occurred in the boneyard based on tire track presence.

G. Spill Prevention and Response

Section 2.1.2.4 of the 2021 MSGP outlines spill prevention and response requirements to minimize the potential for leaks, spills, and other releases that may be exposed to stormwater such as “plainly labeling containers (e.g., “Used Oil,” “Spent Solvents,” “Fertilizers and Pesticides”) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur”....and “keeping spill kits onsite, located near areas where spills may occur or where a rapid response can be made”.

During the inspection, we observed several areas of fuel storage tanks and waste/spent oil and antifreeze in which spill kits were not seen in the vicinity of these areas. Spill kits were not seen throughout the entire site walkthrough; however, they may have been located inside a building that was not visited by the inspection team. Additionally, a fuel storage tank in the Facility’s northern parcel did not have legible NFPA labeling.

H. Non-stormwater Discharges

Section 1.2.2.1 of the 2021 MSGP lists the only non-stormwater discharges authorized by the permit such as discharges from emergency/unplanned firefighting activities and fire hydrant flushings.

We observed the Facility’s main fire system in the southern parcel. Mr. Wood explained it was tested annually and water in the system was drained during that testing. Drained water from the system may leave the Facility via sheet flow or comeingle with stormwater during a rain event. The drained water during planned

testing of a fire system is not listed as an authorized non-stormwater discharge in the permit.

I. Erosion and Sediment Controls

Section 2.1.2.5 of the 2021 MSGP states “To minimize pollutant discharges in stormwater, you must minimize erosion by stabilizing exposed soils at your facility and placing flow velocity dissipation devices at discharge locations to minimize channel and streambank erosion and scour in the immediate vicinity of discharge points. You must also use structural and non-structural control measures to minimize the discharge of sediment...”

We observed loose material that make up a berm serving as a BMP along the Facility’s eastern perimeter in the northern parcel. Additional possible erosion and destabilization was observed adjacent to Indian Creek on the Facility’s eastern perimeter near a gated path leading to the Facility’s eastern parking area.

J. Corrective Actions and Additional Implementation Measures (AIM)

Section 5.1 of the 2021 MSGP outlines corrective action requirements. Section 5.1.1 of the 2021 MSGP outlines conditions requiring SWPPP review and revision, and Section 5.1.1.5 of the 2021 MSGP outlines one of those conditions stating “whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, floating solids, settled solids, suspended solids, foam).”

Section 5.2.2 of the 2021 MSGP describes AIM triggering events including four quarterly annual averages for a parameter exceeding the benchmark threshold (Section 5.2.2.1) or a single sample within a sampling year when fewer than four quarterly samples are collected (Section 5.2.2.2).

The review of the DMRs identified sector specific benchmark exceedances during the following quarters that would have triggered additional implementation measures (AIM) due to the single sample results exceeding the benchmark thresholds by more than four times for the parameters:

- Quarter 2 of 2021 for *E.coli* with a reported geometric mean value of 17,000 (#/100ml) with a limit of 126 (#/100ml) and for total suspended solids with a reported value of 1,350mg/L with a limit of 33mg/L (based on laboratory report dated 6/1/21 that could not be matched with a Quarter 2 of 2021 DMR possibly due to lapse in reporting requirements between the 2015 and 2021 MSGPs or challenges with reporting when IDEQ was delegated authority over the NPDES program and this permit on July 1, 2021)
- Quarter 4 of 2021 for *E.coli* with a reported geometric mean value of 820 (#/100ml) with a limit of 126 (#/100ml)
- Quarter 1 of 2022 for total suspended solids with a reported value of 174 mg/L with a limit of 33mg/L

- Quarter 4 of 2022 for total suspended solids with a reported value of 457 mg/L with a limit of 33mg/L
- Quarter 2 of 2023 for *E.coli* with a reported geometric mean value of 16,000 (#/100ml) with a limit of 126 (#/100ml)

The Facility would have been required to document corrective actions and AIM and implement any necessary modifications or control measures within 14 days of receipt of laboratory results per Part 5.2 of the permit.

During the inspection, Mr. Wood was not aware of any AIM triggering events at the Facility. The Facility's annual reports briefly summarized general corrective actions, but it was unclear if those summaries served as corrective actions and AIM without additional specific documentation as required by permit sections stated above. Mr. Wood further explained that *E.coli* exceedances may be due to rock chuck (small mammal) activity at the Facility and in the vicinity of the Facility.

Additionally, some of the quarterly visual assessment documentation indicated presence of solids and it was not clear if corrective actions were taken, except for the brief summaries in annual reports, to address those observations such as SWPPP review and revision as required in Parts 3.2.2.5 and 5.1.1.5 of the permit.

K. Stormwater Pollution Prevention Plan

Section 6.2 of the 2021 MSGP outlines required contents of the SWPPP.

During the records review of the inspection, the Facility's SWPPP had the following deficiencies:

- Site Map Deficiencies:
 - Missing size of property in acres (Part 6.2.2.3.a)
 - Missing locations of stormwater conveyances (unnamed pipes) per Part 6.2.2.3.f
 - Missing locations for storage or disposal of wastes (Part 6.2.2.3.m.iv)
- Missing COD, phosphorus, *E.coli* as pollutants discharged from facility – because the facility is monitoring for these pollutants (Part 6.2.3.2)
- Missing including schedule or frequency for maintaining all control measures used to comply with effluent limits such as how often the eastern perimeter berm is maintained (Part 6.2.5.1.b)
- Missing sampling frequency (Part 6.2.5.3.b.ii) and missing laboratory used (Part 6.2.5.3.b.v)

L. Annual Reports

Section 7.4 of the 2021 MSGP states “You must submit an Annual Report to EPA via NeT-MSGP, per Part 7.2, by January 30th for each year of permit coverage containing information generated from the past calendar year...”

The 2021 annual report was submitted late on 3/11/22 according to EPA's Integrated Compliance Information System (ICIS) with due date of 1/30/22.

M. Quarterly Visual Assessments

Section 3.2.1 of the 2021 MSGP states “Once each quarter for your entire permit coverage, you must collect a stormwater sample from each discharge point (except as noted in Part 3.2.4) and conduct a visual assessment of each of these samples...”

I reviewed the Facility’s completed visual observation records from 2021 through 2023 offsite and post-inspection. Mr. Wood submitted these records to me via email on 3/15/24 and explained any missing quarterly visual assessment was due to no storm event or the outfall was underwater. Additionally, Part 3.2.4.2 of the permit indicates that a facility may distribute quarterly visual assessments during seasons when precipitation more regularly occurs. The Facility may conduct the assessments during the time of year there is more rain to meet the quarterly requirement rather than not conduct them during a dry time of year.

N. Posted Permit Coverage Sign

Section 1.3.5 of the 2021 MSGP outlines the requirement for a facility to post a sign of its permit coverage.

The Facility did not have a sign of permit coverage posted.

X. Closing Conference

Following the walk-through, a closing conference was held with Mr. Wood where we discussed our observations, the areas of concern, and next steps regarding inspection report transmittal and follow-up from EPA. We thanked him for his time and cooperation with the inspection. Closing conference concluded at 3:30PM.

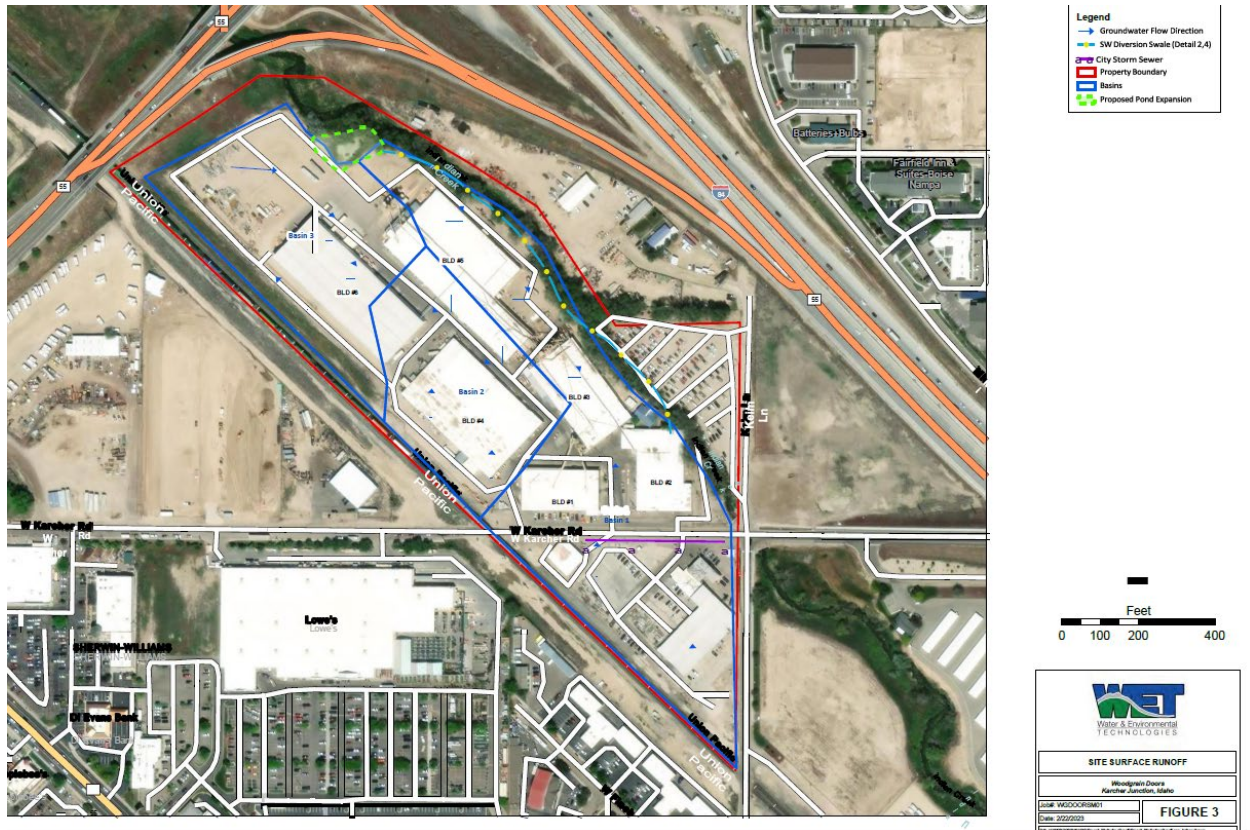
ATTACHMENT A

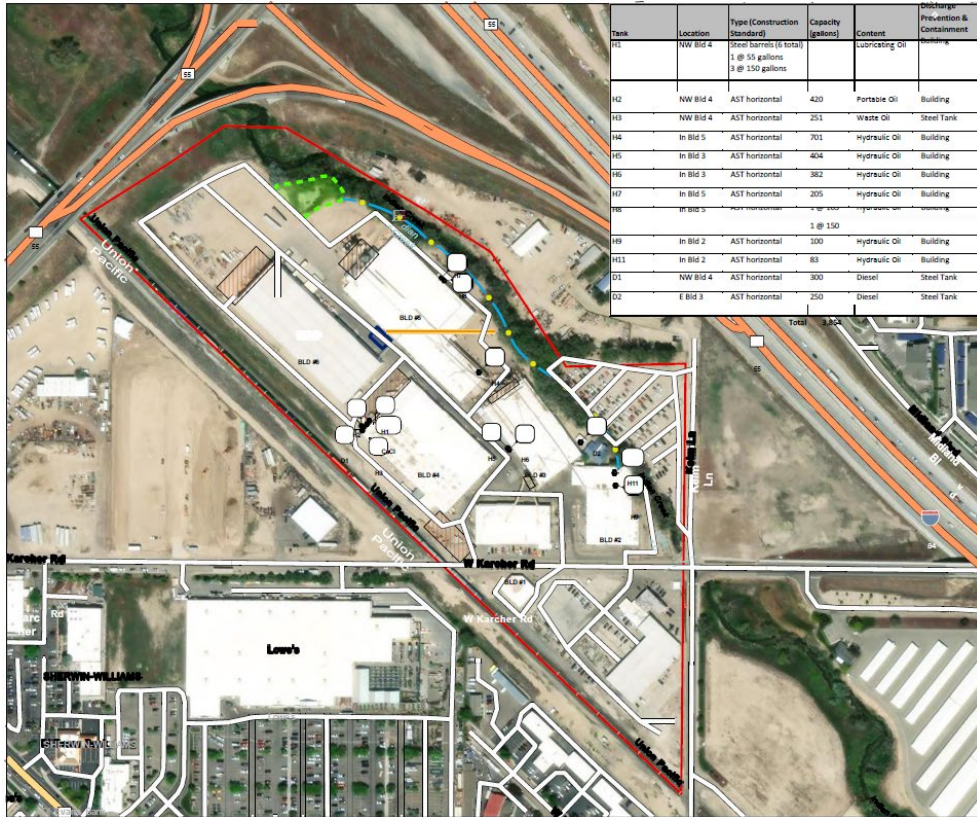
Aerial Image (EPA ArcGIS)



ATTACHMENT B

SWPPP Site Layout with Drainage





- Legend**
- SW-001
 - Storage Tanks
 - SW Diversion Swale (Detail 2.4)
 - Piping
 - Existing Sand/Oil Separation & Discharge Line
 - Proposed Pond Expansion
 - Dust Handling Equipment
 - Loading Area

Feet
0 100 200 400



SWPPP

ATTACHMENT C

Photograph Log

All photographs taken by Vanessa Oquendo on March 1, 2024

Olympus Tough TG-6/F2.0 Camera

Photo Log- Woodgrain Millwork



Photo #:01 (P3010250)

Description: Facing east, photo of sedimentation leading to a storm drain outside the facility's main administrative building on the corner of West Karcher Road and Midland Boulevard. It is not known whether the storm drain belongs to the facility or if it is part of the City of Nampa's MS4 system.



Photo #:02 (P3010251)

Description: Close-up photo of storm drain located outside the facility's main administrative building with sedimentation and debris. It is not known whether the storm drain belongs to the facility or if it is part of the City of Nampa's MS4 system.



Photo #:03 (P3010259)

Description: Facing north, photo of the facility's main fire system that is drained for testing once a year.



Photo #:04 (P3010260)

Description: Close-up photo of the facility's main fire system spout that would drain water from the system during an emergency or testing. Water from this system has the potential to come along with stormwater if drained during a rain event.

Photo Log- Woodgrain Millwork



Photo #:05 (P3010261)

Description: Photo of some debris in the facility's southern parcel.



Photo #:06 (P3010264)

Description: Facing southwest, photo of employee parking area behind Warehouse A at the facility's southern parcel.



Photo #:07 (P3010269)

Description: Facing northwest, photo of materials temporarily stored outside along the facility's southern parcel's western perimeter. The facility was going through a transition and "work-in-progress" period in which materials outside are awaiting relocation at the facility or pick up for proper disposal.



Photo #:08 (P3010275)

Description: Facing northeast, photo of additional materials temporarily stored outside in the facility's southern parcel. The facility was going through a transition and "work-in-progress" period in which materials outside are awaiting relocation at the facility or pick up for proper disposal.

Photo Log- Woodgrain Millwork



Photo #:09 (P3010285)

Description: Facing northwest, photo of the northwestern perimeter of the facility just inside the facility's northern parcel truck gate.



Photo #:10 (P3010286)

Description: Facing southwest, photo of the facility's truck gate entrance/exit in the northern parcel with stormwater pooling outside the gate.



Photo #:11 (P3010290)

Description: Facing northeast, photo of a main truck traffic area in the facility's northern parcel that could be a possible source of vehicle track out to the truck gate during a rain event.



Photo #:12 (P3010293)

Description: Photo of plastic on the ground along the western perimeter of the facility's northern parcel.

Photo Log- Woodgrain Millwork



Photo #:13 (P3010298)

Description: Facing northwest, photo of the facility's metal bins picked up by United Metal for disposal when requested by the facility.



Photo #:14 (P3010303)

Description: Facing southeast, photo of spent antifreeze tank and oil tank at the facility. Waste oil collects in secondary containment below the diesel tank and is pumped out into a waste vendor truck for proper disposal.



Photo #:15 (P3010311)

Description: Photo of waste paint and washwater totes located inside the facility's production building. The waste paint and machinery washwater is pumped out by a waste vendor truck for proper disposal.



Photo #:16 (P3010316)

Description: Facing northwest, photo of the facility's "boneyard" where materials are stored outside. The boneyard is located on impervious ground on the northwestern corner of the facility's northern parcel.

Photo Log- Woodgrain Millwork



Photo #:17 (P3010324)

Description: Facing southeast, photo of the facility's stormwater retention basin that receives stormwater discharge from a drain East of the basin.



Photo #:18 (P3010326)

Description: Facing southeast, photo the facility's stormwater retention basin pipe that discharges stormwater that enters a drain East of the basin.



Photo #:19 (P3010328)

Description: Photo of the stormwater drain that discharges to the facility's stormwater retention basin.



Photo #:20 (P3010331)

Description: Facing southeast, photo of chip bins at the facility and immediate vehicle traffic area in the eastern perimeter.

Photo Log- Woodgrain Millwork



Photo #:21 (P3010339)

Description: Facing northeast, photo of the sawdust loading bay under the facility's chip bin.



Photo #:22 (P3010345)

Description: Facing southeast, photo of the facility's eastern perimeter with a berm on the perimeter's edge adjacent to Indian Creek.



Photo #:23 (P3010347)

Description: Facing east, photo of an unnamed discharge pipe with a screen to Indian Creek at the facility's eastern perimeter.



Photo #:24 (P3010348)

Description: Facing northeast, photo of the discharge end of the unnamed discharge pipe that would discharge into Indian Creek. No active discharge at the time of inspection.

Photo Log- Woodgrain Millwork



Photo #:25 (P3010353)

Description: Facing southeast, photo of additional material temporarily located outside next to the facility's building on the eastern perimeter.



Photo #:26 (P3010356)

Description: Facing north, photo of the facility's monitored discharge point (Outfall SW1) slightly inundated by Indian Creek.



Photo #:27 (P3010358)

Description: Photo of one of the facility's uncovered dumpsters.



Photo #:28 (P3010361)

Description: Facing northeast, photo of a fuel tank at the facility's eastern perimeter.

Photo Log- Woodgrain Millwork



Photo #:29 (P3010362)

Description: Facing north, photo of the facility's eastern perimeter fuel tank with Indian Creek adjacent to it.



Photo #:30 (P3010365)

Description: Facing northwest, photo of possible erosion along some portion the facility's eastern perimeter's berm.



Photo #:31 (P3010369)

Description: Facing east, photo of possible erosion and destabilization along the facility's eastern perimeter potentially caused by rock chucks (small mammals) digging/burrowing.



Photo #:32 (P3010379)

Description: Photo of the facility's storm drain that discharges to Outfall SW1.

Photo Log- Woodgrain Millwork



Photo #:33 (P3010380)

Description: Facing northwest, photo of portable toilets, fire house, and general industrial area close to the Outfall SW1 storm drain in the center of the facility.



Photo #:34 (P3010391)

Description: Facing north, photo of another unnamed pipe that may or may not discharge into Indian Creek from an unknown source/location.



Photo #:35 (P3010393)

Description: Facing north, photo of a discharge pipe into Indian Creek from a rooftop downspout in the eastern part of the facility.



Photo #:36 (P3010394)

Description: Facing west, photo of the rooftop downspout connected to the discharge pipe depicted in Photo 35.

Photo Log- Woodgrain Millwork



Photo #:37 (P3010405)

Description: Facing southeast, photo of the main entrance of the administrative building in the southern parcel of the facility.

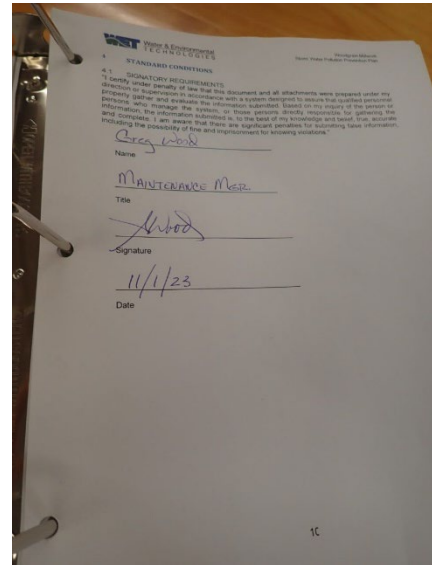


Photo #:38 (P3010247)

Description: Photo of the signed certification page of the facility's SWPPP.



Photo #:39 (P3010389)

Description: Photo of a Facility diesel storage tank with secondary containment missing the NFPA label. A plastic bottle was also inside the secondary containment.



Photo #:40 (P3010401)

Description: Facing southeast and standing from the Facility's eastern parking area, photo of debris close to the western bank of Indian Creek behind the Facility's break room.