

NPDES Inspection Report - Stormwater Industrial

National Database Information		
Inspection Date: 7/27/2023	Inspection Type: Industrial Stormwater	
Entry/Exit Time: 10:30 am / 12:30 pm	NPDES ID Number: COUT00257	
SIC Code: 2448	Inspection ID: 202307_COUT00257	
Lead Inspector and affiliation: Stephanie Meyers / EPA Region 8		
Inspector and affiliation: Althea Wilson / EPA Region 8		
Inspector and affiliation: Eric Philyaw / Colorado Department of Public Health and Environment		
Site/Facility Name and Location: Pueblo Wood Products 1110 E Northern Avenue Pueblo, CO 81006		
Permit Information		
Is the permit on site and available? Unpermitted facility	Date Application Submitted: Unpermitted facility	
Latitude: 38.244379°N	Longitude: -104.596695°W	
Receiving Water(s): The North Mill Treatment Pond at the Evraz Rocky Mountain Steel facility, thence to Salt Creek	Acreage: approximately 8.9 acres	
Regulatory Inspector's source of information: Facility observations		
Contact Information		
	Name(s)/Title	
Facility Contacts: Primary lead and present during inspections	Micah Langston / Corporate Manager / Pueblo Wood Products and Dunmire Development Corporation / Primary lead during the inspection	
	Howard Hallman / President / E-Quest Corporation / present during the inspection	
	Quinn Corum / Intern / E-Quest Corporation / present during the inspection	
	Mike Fisher / Leasee / present during the inspection	
	Brad Dunmire / Dunmire Development Corporation / present during the inspection	
	Darla Dunmire / President / Dunmire Development Corporation / present during the inspection	
	Brian Frazier / Supervisor / Dunmire Development Corporation / present during the inspection	
Person/Company meeting definition of "Operator"	Pueblo Wood Company	
Authorized Official(s) (Per NOI or SWPPP)	N/A, since there is currently no permit for this facility	
Areas Evaluated During Inspection		
Permit	Self-Monitoring Program	Pollution Prevention
Records	Compliance Schedule	<u>Stormwater</u>
<u>Facility Site Review</u>	Laboratory	<u>No Exposure</u>

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Effluent/Receiving Waters	Operations and Maintenance	Other:
Flow Measurement	Sludge Handling/Disposal	Other:
Report Review and Signature		
Drafter Name	Address/Phone Number	Date
Althea Wilson	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	8/7/2023
	303-312-6026	
Reviewer Name	Address/Phone Number	Date
Stephanie Meyers	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	8/28/2023
	303-312-6938	
Supervisor Signature/Name	Address/Phone Number	Date
 Digitally signed by EMILIO LLAMOZAS Date: 2023.09.15 10:52:57 -06'00'	U.S. EPA Region 8 1595 Wynkoop Street 8ENF-W-NW Denver, Colorado 80202	9/15/2023
	Emilio Llamozas	

Inspection Narrative and Site Description
On July 27, 2023, U.S. Environmental Protection Agency (EPA) inspectors Stephanie Meyers and Althea Wilson along with Colorado Department of Public Health and Environment (CDPHE) inspector Eric Philyaw arrived at Pueblo Wood Products (facility) at 10:30 am to conduct an inspection and evaluate the facility's need for industrial stormwater permit coverage. The EPA and CDPHE performed a joint inspection at this facility. The inspection was announced one week prior to the inspection, to coordinate logistics for the inspection and to ensure that appropriate personnel would be available. The EPA inspectors along with CDPHE met with Micah Langston, Corporate Manager for Dunmire Development Corporation, Pueblo Wood Products, and Summit Logging, LLC along with other facility representatives listed above. EPA inspector, Stephanie Meyers, presented her credentials and had an opening conference to explain the purpose of the inspection. The inspectors began by going through a series of checklist questions with the facility representatives. Once complete, the inspectors proceeded to inspect the facility and asked questions to the facility representative to help the inspectors evaluate the need for industrial stormwater permit coverage. Throughout the inspection, the inspectors noted their observations in a checklist. Photographs taken during the inspection are included in the attached photo log. Pueblo Wood Products is located at 1110 E Northern Avenue in Pueblo, Colorado. The facility was established in 1988 as a family owned and operated pallet and crate manufacturer. Pueblo Wood Products is associated with Dunmire Development Corporation. The facility leases the property from Evraz Rocky Mountain Steel, the adjacent steel mill that borders the southern end of the facility. The facility creates various pallet, crating, lumber, and agricultural by-products. Facility representatives

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Inspection Narrative and Site Description

stated they take raw logs from the forest and debark and mill them to create pallet boards and pallet lumber to be sold within the State of Colorado. The logs are stored outside along with the machinery and sawdust byproduct that is also sold to the public.

After the opening conference, inspectors then walked the facility and first observed the final product (photo 96), which were wood pallets and crates stored outside. Next to the final product are the 200-gallon diesel fuel tanks for fueling the machinery (photo 97), although facility representative stated only 50 gallons are stored in them at a time due to theft. The facility is located on top of a sheet of slag and receives slag on a regular basis from Evraz Rocky Mountain Steel to pack in the surface of the property where needed. The facility keeps a stockpile of slag in the northwest corner of the property (photo 98). Logs are stored outside on the southwest end of the facility where they await debarking (photo 101). Near the log storage is the debarker machine (photo 100), and the wood chips it produces stockpiled near the machine (photo 99). Facility representatives indicated that all their logs go through this debarking process before they can be used. The debarker machine utilizes hydraulic fluid that is stored outside (photo 102), on the northeast side of the facility.

Next, inspectors walked by the micro sawmill machine (photo 104) that facility representatives indicated is used to cut smaller pieces of wood into planks and boards. The micro sawmill produces a finer sawdust that is stockpiled outside (photo 104). Inspectors then walked the south end of the facility, where sawdust runs down the hill along the southern end of the property across the boundary of the property and onto a service road on Evraz Rocky Mountain Steel mill property (photo 103). On the southern border of the facility sawdust also runs beyond the fence into Evraz Rocky Mountain Steel's North Mill Treatment Pond (photo 105). Water in the North Mill Treatment Pond then flows directly into Salt Creek.

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

Findings, Corrective Actions, and Recommendations

Finding 1: Pueblo Wood Products is an industrial facility under industrial stormwater Sector A: Timber Products, operating without industrial stormwater permit coverage.

The facility's primary SIC code is 2448 (Wood Pallets and Skids), which falls under industrial stormwater Sector A: Timber Products, requiring industrial stormwater permit coverage. See attached fact sheet for additional information on Sector A.

The facility has outdoor industrial operations/activities as well as outdoor storage of materials which are exposed to stormwater (photos 96-105). Inspectors observed sawdust stored in piles outdoors with no containment (photos 99, 103 and 104) that were spilling over the hill past the property and into the North Mill Treatment Pond of Evraz Rocky Mountain Steel, which flows directly into Salt Creek.

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Findings, Corrective Actions, and Recommendations

Regulatory Information:

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

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

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

Corrective Action:

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

Finding 2: Sawdust is stockpiled outdoors with no containment (photos 99, 103 and 104).

Inspectors observed sawdust stored in piles outdoors with no containment that were spilling over the hill past the property and into the North Mill Treatment Pond of Evraz Rocky Mountain Steel, which flows directly into Salt Creek.

Recommendation: Ensure sawdust material is contained within the facility and implement a routine cleaning schedule to remove any sawdust material left on the ground. Implement best management practices (BMPs) to contain the piles of sawdust stored outside.

Finding 3: Slag is stored outside with no containment (photo 98).

Inspectors observed a pile of slag stored outside with no containment.

Recommendation: Ensure all materials, including slag are properly contained and BMPs are in place to prevent materials runoff with stormwater.