

INSPECTION REPORT

Inspection Entry Date/Time	11/15/2022 09:30 AM (PT)	Announced: No	
Inspection Exit Date/Time	11/15/2022 02:45 PM (PT)	Access: Granted	
Weather	Sunny, 50°F		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial		
Type of Inspection	ISI - Industrial Stormwater Inspection		
Permittee Name	WestRock CP LLC		
Facility or Site Name	WestRock		
Facility Address	9930 N Burgard Way		
City, State, Zip Code	Portland, OR 97203		
Count	Multnomah County		
Facility GPS Coordinates	45.61298, -122.77831		
FRS ID	110069567846		
Permit Number	ORR242301		
SIC	2653 (Corrugated & Solid Fiber Box mfg)		
Regulatory Representatives Participating in Inspection:			
Title	Name	Organization	
Environmental Manager	Stacy Hibbard	City of Portland	
Lead Inspector:			
Raymond Andrews	EPA Region 10	andrews.raymond@epa.gov	(206) 553-4252
Supervisor Review:			
Peter Contreras	EPA Region 10	contreras.peter@epa.gov	(206) 553-6708

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

I arrived at WestRock (“Site” or “Facility”), located at 9930 N Burgard Way, Portland, OR 97203, at 9:30 AM (PT) on 11/15/2022 for an unannounced inspection. I presented my credentials to Tom Maas, Production Manager, and Cameron Manning, EHS Manager. I informed them I was there to conduct an inspection to determine compliance with the Clean Water Act (CWA), and the facility’s Oregon 1200-Z Industrial Stormwater Discharge permit. I was accompanied on the inspection by Stacy Hibbard, City of Portland Environmental Manager, as an observer.

This report is based on information supplied by Mr. Maas, Mr. Manning, and Mr. Karl Schumacher, Senior Environmental Services Manager, direct observations made at the time of the inspection; and a review of records and reports maintained by the facility. In addition, information gathered from a review of EPA, State, and/or public records may be included in this report.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA Region 10	Raymond Andrews	Lead Inspector	Yes	Yes
City of Portland	Stacy Hibbard	Environmental Manager	Yes	Yes
WestRock	Cameron Manning	EHS Manager	Yes	Yes
WestRock	Tom Maas	Production Manager	Yes	Yes
WestRock	Karl Schumacher	Sr. Environmental Services Manager	Yes	Yes

Facility/Site Information

Responsible Official?	Tom Maas, Production Manager
Name of Primary Person Engaging with the Inspector?	Cameron Manning, EHS Manager
Is SWPCP Team Present?	Part of SWPCP team was Present; Tom Mass & Cameron Manning are present; however the Maintenance Manager, Justin Hoyt, was not present.
Size of Facility?	The site covers approximately 10 acres. Five acres are covered by buildings, three acres are covered by asphalt/pavement, and two acres are covered in a combination of gravel and vegetation. Most of north side is unpaved.
Hours/Days of Operations?	The facility operates 24 hours a day, Monday - Friday with 3 shifts.
Is Property Owned?	The Property is mostly owned by WestRock CP LLC. Approximately 2.5 acres of the property site is leased from Schnitzer Investment Corp.
Type of Operation?	The facility makes corrugated boards and boxes.
Industrial Activities Exposed to Stormwater?	The facility stores wood pallets and triple-rinsed 250-gallon chemical storage totes outside.
BMPs/Stormwater Treatment?	Stormwater is collected in catch basins. Once in the catch basins the water gravity flows to an infiltration Planter.

Number/Location of Stormwater Inlets/ Outfalls/Drains?	The facility has a total of seven monitored catch basins, an infiltration basin, and an infiltration planter. Two of the catch basins are in the parking lot.
Receiving Water	The receiving water is a slip of the Willamette River.
Does the facility have any waivers for sampling?	The facility does not have any current monitoring waivers.
When was the facility's last inspection?	The facility was last inspected in March 2022 by the City of Portland. The state has delegated the City of Portland the authority to monitor compliance with all permitted facilities within the City footprint. The City inspects every permitted facility annually.
Has the facility ever had an enforcement action taken against it?	The Oregon Department of Environmental Quality (ODEQ) took an enforcement action against the facility in May 2020. ODEQ issued a civil penalty of \$11,478 to the facility for failure to monitor for benchmark and impairment pollutants from February 26, 2019, through June 30, 2019.
Additional Information:	The site is graded so stormwater sheet flows to one of the catch basins. The catch basins have filter inserts and are encircled by absorbent socks. The purpose of the filters and socks were used to reduce the quantity of particulate matter entering the catch basins. While not listed as an area of concern, it appears that several of the socks needed maintenance. All catch basins are sampled individually through grab sampling. The infiltration basin receives and treats runoff from the eastern part of the building roofs and the paved areas northeast and east of the building. Roof drains from the eastern part of the building are piped to the infiltration basin. The infiltration planter receives runoff from the southern paved area. Runoff from the northern area sheet flows to the infiltration planter via wall notches that allow runoff to directly flow into the infiltration planter. Catch Basin 1 receives runoff from the paved area southeast of the building. Catch Basin 2 receives sheet flow from the north. Catch Basin 3 receives sheet flow from a portion of the paved area south of the building. Catch Basin 4 sheet flow primarily from East and West in parking area/drive through. Catch basin 5 receives sheet flow primarily from the north and a little from the west. The facility has three outfalls. The outfalls were inaccessible at the time of the inspection so were not observed.

SECTION II – OBSERVATIONS



Photo 1/P1010537 – Catch Basin 1



Photo 2/P1010532 – Catch Basin 2



Photo 3/P1010530 – Catch Basin 4



Photo 4/P1010531 – Catch Basin 5



Photo 5/P1010536 – Infiltration Planter

Record: Other - Stormwater Pollution Control Plan (SWPCP)		AOC: No
Ref #: RA1-RR-009	Reviewed By: Raymond Andrews	Reviewed Date: 11/15/2022
Record: Other - 3rd Party Consent Decree with Northwest Environmental Defense Center (NEDC)		AOC: No
Ref #: RA1-RR-008	Reviewed By: Raymond Andrews	Reviewed Date: 11/15/2022
Record: Personnel Training		AOC: Yes
Ref #: RA1-RR-007	Reviewed By: Raymond Andrews	Reviewed Date: 11/15/2022
No annual training conducted in 2021.		
Record: Other - Monthly Site Inspection Logs		AOC: No
Ref #: RA1-RR-006	Reviewed By: Raymond Andrews	Reviewed Date: 11/15/2022
Record: Other - Weekly Catch Basin Inspection Logs		AOC: No
Ref #: RA1-RR-005	Reviewed By: Raymond Andrews	Reviewed Date: 11/15/2022
Record: Other - Monthly Infiltration Basin Inspection Logs		AOC: No

Ref #: RA1-RR-004	Reviewed By: Raymond Andrews	Reviewed Date: 11/15/2022
Record: DMR Reports		AOC: No
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 11/15/2022
Record: Laboratory Analysis Reports		AOC: No
Ref #: RA1-RR-002	Reviewed By: Raymond Andrews	Reviewed Date: 11/15/2022
Record: Other - Stormwater Corrective Action Tier I Report		AOC: No
Ref #: RA1-RR-001	Reviewed By: Raymond Andrews	Reviewed Date: 11/15/2022

SECTION III - AREAS OF CONCERN

Areas of Concern may not be in sequential order. The presentation of areas of concern does not constitute a formal compliance determination or violation.

AOC Reference #: RA1-RR-007	Records Review: Personnel Training
Regulation and/or Permit Requirement Schedule A.1.j.iii Education and training must be documented and must occur: (1) No later than 30 calendar days after hiring an employee who works in areas where stormwater is exposed to industrial activities or conducts duties related to the implementation of the SWPCP; (2) No later than 30 calendar days after change in duties for key personnel in Schedule A.1.j.ii; and, (3) Annually thereafter	
AOC: No annual training conducted in 2021.	

SECTION IV – CLOSING CONFERENCE

I held a closing conference with Stacy Hibbard and facility personnel at 02:45 PM (PT) on 11/15/2022. During the closing conference, I discussed my observations and the Area of Concern identified during the inspection.

SECTION V – LIST OF APPENDICES

1. Photo Log

APPENDIX 1: PHOTO LOG

P1010529 – Catch Basin 4, photo 1 (Not used in Report)
P1010530 – Catch Basin 4, photo 2
P1010531 – Catch Basin 5
P1010532 – Catch Basin 2
P1010533 – Catch Basin 6, photo 1 (Not used in Report)
P1010534 – Catch Basin 6, photo 2 (Not used in Report)
P1010535 – Infiltration Planter, photo 1
P1010536 – Infiltration Planter, photo 2 (Not use in Report)
P1010537 – Catch Basin 1
P1010538 – Catch Basin 1 Monitoring Location (Not used in Report)