

INSPECTION REPORT

Inspection Entry Date/Time	11/19/2024 09:26 AM (PT)	Announced: No	
Inspection Exit Date/Time	11/19/2024 02:10 PM (PT)	Access: Granted	
Weather	55°F, Overcast		
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, Stormwater – Industrial		
Type of Inspection	Compliance Evaluation Inspection		
Permittee Name	Swanson Group Manufacturing, LLC		
Facility or Site Name	Springfield Plywood & Veneer		
Facility/Site Physical Address	1651 South F Street		
City, State, Zip Code	Springfield, Oregon 97477		
County	Lane		
Facility GPS Coordinates	44.04207, -123.005269		
Mailing Address	P.O. Box 250		
City, State, Zip Code	Glendale, Oregon 97442		
FRS ID	110001655575		
Permit Number	ORR221309		
SICs	2421 (Sawmills & Planing Mills, General) 2436 (Softwood Veneer & Plywood)		
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 – Opening Conference

I arrived at the Swanson Group Manufacturing’s Springfield Plywood & Veneer facility (the “Site” or “Facility”), located at 1651 S F St, Springfield, Oregon, at 09:26 AM (PT) on 11/19/2024 for an unannounced inspection. I presented my credentials to Doug Rue and informed him I was there to conduct an inspection to determine compliance with the Clean Water Act (CWA) and the facility’s Oregon Department of Environmental Quality (ODEQ) 1200-Z permit for industrial stormwater, permit # ORR221309. This report is based on information supplied by Mr. Rue, my direct observations, and records and reports maintained by the permittee. In addition, information gathered prior to or after the Inspection 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
Swanson Group	Doug Rue	Log Yard Lead	Yes	Yes
Swanson Group	Mike Vohland	Maintenance Manager	Yes	Yes
Swanson Group	Kelly Smith	Plant Superintendent	Yes	Yes

Facility Information

Responsible official?	Jeff Remington; jeff.remington@swansongroup.biz
Is property owned or leased?	The property is owned by Swanson Group.
Years in operation?	Swanson Group bought out the previous owner in 2007.
Type of Operation	The facility produces plywood and veneers from logs.
Size of Facility?	The total facility site is approximately 31 acres with the log ward taking up approximately 12 of those acres.
Number of employees?	The facility has approximately 220 employees to cover all shifts. The mill operates three 8-hour shift, Monday through Friday, and will occasionally run extra shifts on Saturday to meet a customer order.
Number of sampling locations?	The facility has six outfalls but only five sampling locations. Outfall 005 sends its stormwater to Outfall 006 for discharge. Samples are collected at Outfalls 001 – 004 and Outfall 6. The discharge from Outfall 5 is sent by underground pipe to Outfall 6 for discharge.
Receiving Water?	Willamette River
Who conducts monitoring?	Mr. Rue conducts the sampling, inspections, and reporting.
Does the facility conduct visual assessments?	The facility conducts a monthly visual assessment by observing the water as it flows out of the outfalls.
What parameters is the facility required to analyze?	The facility is required to conduct water sample analysis for zinc (Zn), copper (Cu), total suspended solids (TSS), chemical oxygen demand (COD), iron (Fe), lead (Pb), and pH. The facility analyzes pH on site. All other parameters are analyzed by the contract lab: Analytical Laboratory Group 361 West 5th Avenue Eugene, Oregon 97401 (541) 485-8404

Have you had any benchmark exceedances in the past 12 months?	The facility has exceeded its benchmarks for zinc, COD, and TSS. Multiple Tier I reports were submitted due to the exceedances. The Tier I reports were reviewed in "Records Review."
BMPs/Stormwater Treatment?	The facility uses catch basins with oil/water separators. The catch basins are either surrounded by filter booms or contain absorbent pads. The facility discharges into a heavily vegetated flow channel (ditch) which then drains into the Willamette River.
Type of materials and/or vehicles stored outdoors?	The facility stores raw logs, packaged products waiting for ship out, heavy equipment, i.e. forklifts, and a water truck which is used for dust control.

SECTION II – Observations

Location: Outside Storage		
Observation #: RA1-OB-001	Date: 11/19/2024	Weather: 55°F, Overcast
Packaged finished product.		
Photo(s)		
1. IMG-20241119135223522383817.jpg		
Location: Outside Storage		
Observation #: RA1-OB-002	Date: 11/19/2024	Weather:
Material waiting for processing.		
Photo(s)		
1. IMG-2024111913100510584894.jpg		
Location: Outside Boiler		
Observation #: RA1-OB-003	Date: 11/19/2024	Weather:
At the time of inspection, I observed an open dumpster that contained ash from the boiler. It did not appear the dumpster was being actively loaded or unloaded.		
Photo(s)		
1. IMG-202411191320572057121497.jpg		
Location: Outside Boiler		
Observation #: RA1-OB-004	Date: 11/19/2024	Weather:
At the time of the inspection, I observed piles of sawdust accumulated on the walls and ground outside the boiler building.		
Photo(s)		
1. IMG-202411191327502750113399.jpg		

SECTION III – Records Review

Records may not be in sequential order.

Record: DMR Reports		AOC: No
Ref #: RA1-RR-007	Reviewed By: Raymond Andrews	Reviewed Date: 01/13/2025
Post inspection, I reviewed the facility's Discharge Monitoring Reports (DMRs) from 1Q 2022 through 4Q 2024. I did not note any areas of concern.		
Record: Tier II Corrective Action Responses		AOC: No
Ref #: RA1-RR-006	Reviewed By: Raymond Andrews	Reviewed Date: 01/13/2025
Post Inspection, I reviewed two Tier II Corrective Action Response (CAR) SPCP Addendums, dated February 9, 2023 (Addendum 1), and November 15, 2023 (Addendum 2). The Responses were prepared for the facility by the contract engineering firm EGR & Associates, Inc. The Addendum 1 CAR was in response to exceedance of the benchmark geometric mean for total suspended solids (TSS) at Outfall 006. The corrective action plan required the facility to retrofit the settling basin in the log grading and storage area with baffles to improve settling efficiency of sediment in the stormwater. The Addendum 2 CAR was in response to exceedance of the benchmark geometric mean for zinc (Zn) at Outfall 004. The facility and the contract engineer determined the most likely cause of the excessive zinc in the stormwater was runoff from the rooftops. To mitigate the discharge of zinc, the corrective action plan required the facility to install a self-contained downspout filter treatment unit at each of the roof downspouts. The filters use a filter media that specifically targets dissolved metals including zinc. The facility selected the Storm Clean® assembled downspout filter system manufactured by CleanWay® Environmental Partners with MetalZorb® metals filtration media. The downspout pipes were connected to an individual filter unit, which has an internal high-flow bypass. The filter units will discharge onto adjacent pavement as currently occurs with the roof downspouts.		
Photo(s) 1. IMG-20241119134536453684437.jpg 2. IMG-20241119134544454489323.jpg		
Record: Routine Monthly Facility Inspection Reports		AOC: No
Ref #: RA1-RR-005	Reviewed By: Raymond Andrews	Reviewed Date: 11/19/2024
At the time of inspection, I reviewed the facility's routine monthly inspection reports from January 2022 through October 2024. I did not note any areas of concern.		
Record: Monthly Visual Inspections		AOC: Yes
Ref #: RA1-RR-004	Reviewed By: Raymond Andrews	Reviewed Date: 11/19/2024
At the time of inspection, I reviewed monthly visual assessments from January 2022 through October 2024. According to Mr. Rue, the facility is not conducting visual inspections in accordance with the permit. The permit requires samples be collected in a clean, colorless glass or plastic container for inspection in a well-lit area. Mr. Rue is making his observations without collecting a sample in a container.		
Record: Facility Benchmark Exceedance Tier I Reports		AOC: No
Ref #: RA1-RR-003	Reviewed By: Raymond Andrews	Reviewed Date: 11/19/2024

At the time of the inspection, I reviewed the facility's Tier I reports for the following dates. Under each date is the benchmarks that were exceeded at each outfall.

- 1/5/2022 - Sampled 11/23/2021, Results 12/13/2021
 - OF 1 (Cu)
 - OF 2 (Zn)
 - OF 3 (Zn)
 - OF 4 (COD)
 - OF 6 (COD, TSS)
- 2/11/2022 - Sampled 12/22/2021, Results 1/12/2022
 - OF 2 (Zn)
 - OF 3 (Zn)
 - OF 4 (COD)
 - OF 6 (COD)
- 4/12/2022 - Sampled 3/9/2022, Results 3/17/2022
 - OF 2 (Zn)
 - OF 3 (Zn)
 - OF 4 (COD)
 - OF 6 (Cu, COD, TSS)
- 4/20/2022 - Sampled 4/4/2022, Results 4/18/2022
 - OF 1 (Cu, COD, TSS)
 - OF 2 (Zn)
 - OF 3 (Zn)
 - OF 6 (COD)
- 12/12/2022 - Sampled 11/11/2022, Results 11/21/2022
 - OF 2 (Zn)
 - OF 3 (Zn)
 - OF 4 (Zn, COD)
- 1/20/2023 - Sampled 12/10/2022, Results 12/27/2022
 - OF 1 (Zn, COD)
 - OF 2 (Zn)
 - OF 3 (Zn)
 - OF 4 (Zn, COD)
 - OF 6 (COD, TSS)
- 2/16/2023 - Sampled 1/11/2023, Results 1/19/23
 - OF 2 (Zn)
 - OF 3 (Zn, Cu, COD, TSS)
 - OF 4 (Zn, COD)
 - OF 6 (COD, TSS)
- 4/17/2023 - Sampled 3/2/2023, Results 3/17/2023
 - OF 2 (Zn)
 - OF 3 (Zn)
 - OF 4 (Zn, COD)
- 12/13/2023 Sampled 11/6/2023, Results 11/16/2023
 - OF 1 (Cu, COD)
 - OF 2 (Zn)
 - OF 3 (Zn)
 - OF 4 (Zn, COD, TSS)
 - OF 6 (COD)
- 2/1/2024 - Sampled 12/22/24, Results 1/2/2024
 - OF 1 (Zn, Cu, COD, TSS)
 - OF 2 (Zn)

- OF 3 (Zn)
- OF 4 (Zn, COD)
- 3/26/2024 - Sampled 2/14/2024, Results 2/28/2024
 - OF 1 (Fe, COD)
 - OF 3 (Zn)
 - OF 4 (COD)
- 4/12/2024 - Sampled 3/4/2024, Results 3/18/2024
 - OF 2 (Zn)
 - OF 3 (Zn)
 - OF 4 (COD)
 - OF 6 (COD)

Not all Tier I reports required a Tier II Action Response because the parameters' geometric means had not been exceeded.

Record: Laboratory Analysis Reports

AOC: No

Ref #: RA1-RR-002

Reviewed By: Raymond Andrews

Reviewed Date: 11/19/2024

At the time of inspection, I reviewed lab analysis reports from 1Q 2022 through 3Q 2024. I did not note any areas of concern.

Record: Stormwater Pollution Control Plan (SPCP)

AOC: Yes

Ref #: RA1-RR-001

Reviewed By: Raymond Andrews

Reviewed Date: 11/19/2024

At the time of inspection, I reviewed the facility's Stormwater Pollution Control Plan (SPCP), dated June 2021. The SPCP shows the facility is under SIC code 2421 (Sawmills and Planing Mills, General) but based on activities, SIC code 2436 (Softwood Veneer and Plywood) should probably be added as a secondary activity. The facility is no longer monitoring or discharging from Outfall 5, so the map should be updated. The site plan does not indicate when packaged products are stored outside. The site plan does not show the loading and offloading areas. The site plan is missing the immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility.

Photo(s)

1. [IMG-20241119104817481797970.jpg](#)

SECTION IV – Sampling Activities

No sampling was conducted

SECTION V – 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-004

Records Review: Monthly Visual Inspections

Permit Requirement

Part B.12.e of the permit states, in part, "Conduct visual observations of a sample in a clean, colorless glass or plastic container in well-lit area..."

AOC:

The samples are not being collected in a clean, colorless glass or plastic container for inspection in a well-lit area.

AOC Reference #: RA1-RR-001	Records Review: Stormwater Pollution Control Plan (SPCP)
Permit Requirement Schedule A.8.f of the permit states, "The permit registrant must keep the SWPCP current and revise it as necessary to reflect current site conditions and changes to the site."	
AOC: The facility is no longer monitoring or discharging from Outfall 5, so the map should be updated.	
AOC Reference #: RA1-RR-001	Records Review: Stormwater Pollution Control Plan (SPCP)
Permit Requirement Part Schedule A.10.b.i.8 of the permit states, in part, "The SWPCP must contain the following information...areas used for outdoor manufacturing, treatment, storage, or disposal of significant materials..."	
AOC: The site plan does not indicate where packaged products are stored outside.	
AOC Reference #: RA1-RR-001	Records Review: Stormwater Pollution Control Plan (SPCP)
Permit Requirement Part Schedule A.10.b.i.19.C & G states, in part, "The SWPCP must contain the following information...locations of the following materials and activities if they are exposed to stormwater and applicable...loading/unloading areas [and] immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility..."	
AOC: The site plan did not show the loading and offloading areas. The site plan is missing the immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility.	
AOC Reference #: RA1-OB-003	Location: Outside Boiler
Permit Requirement Schedule A.1.c of the permit states, in part, "Cover all waste contained in bins or dumpsters where there is a potential for drainage of stormwater through the waste to prevent exposure of stormwater to these pollutants. Acceptable covers include, storage of bins or dumpsters under roofed areas or use of lids or properly secured temporary covers such as tarps."	
AOC: There was open dumpster that contained ash from the boiler. It did not appear the dumpster was being actively loaded or unloaded.	
AOC Reference #: RA1-OB-004	Location: Outside Boiler
Permit Requirement Schedule A.1.g of the permit states, in part, "Routinely clean all exposed areas that may contribute pollutants to stormwater with measures such as sweeping at regular intervals..."	
AOC: Piles of sawdust were accumulated on the walls and ground outside the boiler building.	

SECTION VI – Closing Conference

I held a closing conference with Facility personnel at 02:10 PM (PT) on 11/19/2024 for the inspection. During the closing conference, I discussed the observations and Areas of Concern I identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination.

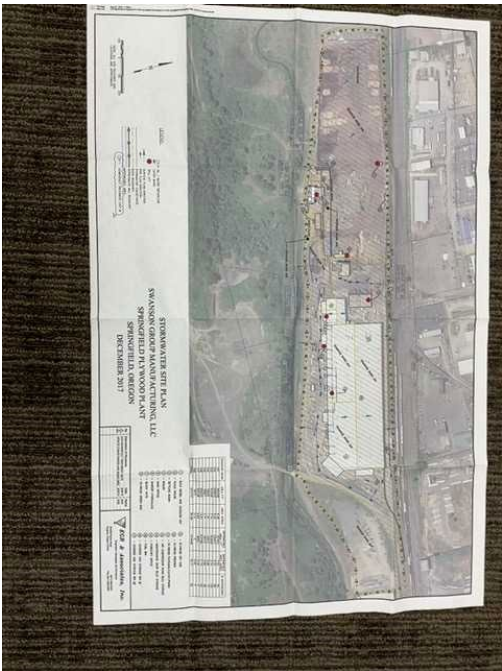
SECTION VII – List of Appendices

1. Photo Log

APPENDIX 1: PHOTO LOG



Site Map, photo 1			IMG-20241119104817481797970.jpg
11/19/2024 10:48 AM	No CBI	No PII	Photographer: Raymond Andrews



Site Map, photo 2			IMG-202411191050565056121596.jpg
11/19/2024 10:50 AM	No CBI	No PII	Photographer: Raymond Andrews



Outfalls 002			IMG-20241119130531531179340.jpg
11/19/2024 01:05 PM	No CBI	No PII	Photographer: Raymond Andrews
Outfall 002 discharge pipe.			



Outside Storage			IMG-2024111913100510584894.jpg
11/19/2024 01:10 PM (PT)	No CBI	No PII	Photographer: Raymond Andrews
Raw material waiting outside for processing.			



Catch Basin 003			IMG-202411191312321232135324.jpg
11/19/2024 01:12 PM	No CBI	No PII	Photographer: Raymond Andrews
Catch basin 003 with oil/water separator on right.			



Outside Boiler			IMG-202411191320572057121497.jpg
11/19/2024 01:20 PM	No CBI	No PII	Photographer: Raymond Andrews
Open dumpster with ash from boiler.			



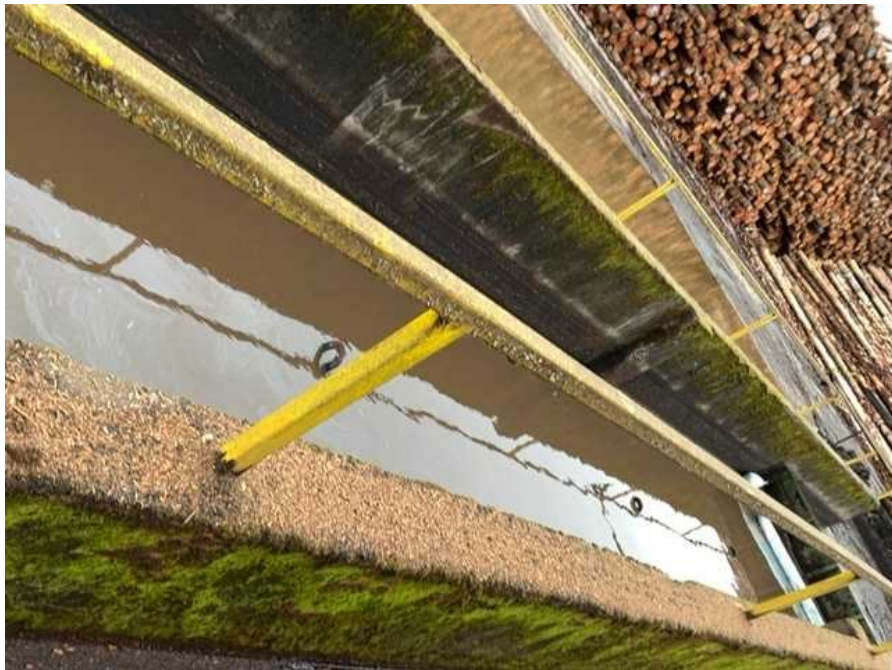
Outside Boiler			IMG-202411191327502750113399.jpg
11/19/2024 01:27 PM	No CBI	No PII	Photographer: Raymond Andrews
Sawdust piles outside of boiler area.			



Outfall 001			IMG-202411191334233423154693.jpg
11/19/2024 01:34 PM	No CBI	No PII	Photographer: Raymond Andrews
Outfall 001 with oil absorbent pads.			



Catch Basin 006			IMG-20241119134007407123578.jpg
11/19/2024 01:40 PM	No CBI	No PII	Photographer: Raymond Andrews
Catch basin 006, photo 1.			



Catch Basin 006			IMG-202411191340134013130039.jpg
11/19/2024 01:40 PM	No CBI	No PII	Photographer: Raymond Andrews
Catch basin 006, photo 2.			



Storm Clean® Downspout Filter System, exterior, photo 1			IMG-20241119134525452570542.jpg
11/19/2024 01:45 PM	No CBI	No PII	Photographer: Raymond Andrews
The above photo is the Storm Clean® downspout filter system which collects and filters runoff from the facilities rooftops. Every roof downspout has its own Storm Clean® filter. Inside the filter system is the MetalZorb® metals filtration media, which filters a variety of metals including the target metal, zinc.			



Storm Clean® Downspout Filter System, exterior, photo 2			IMG-20241119134536453684437.jpg
11/19/2024 01:45 PM	No CBI	No PII	Photographer: Raymond Andrews



Storm Clean® Downspout Filter System, Interior			IMG-20241119134544454489323.jpg
11/19/2024 01:45 PM	No CBI	No PII	Photographer: Raymond Andrews
Filter for runoff from building roof, interior			



Outside Storage			IMG-20241119135223522383817.jpg
11/19/2024 01:52 PM	No CBI	No PII	Photographer: Raymond Andrews
Packaged finished product waiting for ship out.			