



NPDES Compliance Inspection Report

Swanson Brothers Lumber Company, Inc. Noti, Oregon

Permit #: ORR221264

Inspection Date: March 24, 2021

Prepared by:

Raymond Andrews
U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Field, Data & Drinking Water Enforcement Section

Signature/Date:

Andrews, Raymond L. Digitally signed by Andrews, Raymond L.
Date: 2021.05.27 13:53:15 -07'00'

Supervisor Signature/Date:

PETER CONTRERAS Digitally signed by PETER CONTRERAS
Date: 2021.05.27 15:56:04 -07'00'

Contents

I.	Facility Information	1
II.	Inspection Information.....	1
III.	Permit Information.....	2
IV.	Background	2
V.	Inspection Chronology.....	3
VI.	Opening Conference	3
VII.	Laboratory Inspection	4
VIII.	File Review	5
IX.	Site Inspection.....	5
X.	Areas of Concern	6
XI.	Closing Conference.....	7

ATTACHMENT A – Aerial Images of Site Provided by Google Maps

ATTACHMENT B – Inspection Photographs and Photograph Log

(All details in this report were obtained through conversations with Mr. Larry Konnie, President, Zach Konnie, Vice President, and Mr. Ben Jacobs, Maintenance Superintendent, or from observations made during the inspection.)

I. Facility Information

Facility Name: Swanson Brothers Lumber Company, Inc.

Facility Owner/Operator: Larry Konnie

Physical Address: 22664 Noti Loop Road
Noti, Oregon 97461

Lat/Long: 44.05832, -123.44451

Mailing Address: P.O. Box 309
Noti, Oregon 97461

NAICS Code: 321113 (Sawmills)
SIC Code: 2421 (Sawmills & Planing Mills, general)

Facility Contacts: Larry Konnie
President
Office Phone: 541-935-2231
Mobile Phone: 541-554-7696
Email: l.konnie@swansonbros.com

Zach Konnie
Vice President
Mobile Phone: 541-654-1838
Email: zach@swansonbros.com

Ben Jacobs
Maintenance Superintendent
Mobile Phone: 360-708-5075
Email: bjacobs@swansonbros.com

Permit Number: ORR221264

Receiving Water: Long Tom River

II. Inspection Information

Inspection Date: March 24, 2021

Inspector: Raymond Andrews, Inspector
EPA Region 10, ECAD /FDDWES
Phone: 206-553-4252

Arrival Time: 09:00 AM

Departure Time: 1:30 PM

Weather: Overcast/Drizzle, 40°F

Purpose: To determine facility compliance with the Oregon 1200-Z General National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act.

III. Permit Information

Swanson Brothers Lumber Company (“Facility”) is permitted under the Oregon 1200-Z National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit (“Permit”). The Facility’s current permit, NPDES permit # ORR221264, became effective on August 1, 2017, and will expire on July 31, 2022. The facility is permitted under Sector A (General Sawmills and Planing Mills) of the permit. The facility has been operating at its current location since 1934.

IV. Background

Swanson Brothers Lumber Company, Inc., located at 2220 Nugget Way in Eugene, Oregon is owned and operated by Larry Konnie.

On September 24, 2018, the Oregon Department of Environmental Quality (ODEQ) issued an Expedited Enforcement Offer (EEO) to the facility for stormwater violations. The violations were for failure to conduct sampling as required by the permit. The facility agreed to pay a \$1,600 penalty.

On September 17, 2019, the Environmental Protection Agency (EPA) conducted a reconnaissance inspection of the facility. No further action was taken.

On October 22, 2019, ODEQ issued the facility a warning for failure to submit two documents, the 2019 3rd quarter Discharge Monitoring Report (DMR), and a Tier 1 corrective action report for an exceedance of a pollutant’s benchmark reference concentration.

On February 5, 2021, ODEQ sent the facility a Warning Letter for failure to collect biochemical oxygen (BOD) samples at Outfall 002 at the interval required in Schedule B.2.f.i of the permit. No further action was taken.

V. Inspection Chronology

This was an announced inspection. On March 8, 2021, I called Mr. Ben Jacobs, Maintenance Superintendent, and stated that I wanted to conduct an NPDES compliance inspection of the Swanson Brothers Lumber Company facility in Noti, Oregon. We agreed to meet at the facility on March 24, 2021, at 9:00 am.

I conducted an Opening Conference, which included an interview of Mr. Larry Konnie, President, Mr. Zach Konnie, Vice President, and Mr. Jacobs, followed by a records review, a site inspection, and a Closing Conference.

VI. Opening Conference

I arrived at the facility at 9:00 am, as agreed. I presented my credentials to Mr. Larry Konnie, Mr. Zack Konnie, and Mr. Ben Jacobs, henceforth, collectively referred to as “the Representatives.” I provided a copy of the EPA Small Business Resource Sheet to Mr. Jacobs.

I explained the purpose of the inspection was to determine compliance with the Oregon Department of Environmental Quality’s (ODEQ) 1200-Z permit and the Clean Water Act (CWA).

The following information was obtained through conversation with the Representatives.

The facility has been in operation at its current location since 1934. It is a stand-alone operation. The facility operates Monday through Friday from 6:00 am until 3:30 pm, and has approximately 65 full time employees.

The facility is a sawmill that only accepts Douglas fir. The primary processes of the facility are log cutting. It specializes in producing dimensional lumber but also produces large decorative timbers and other specialty orders.

The facility’s site covers 20 acres with approximately eight acres ($\approx 63\%$) impervious to penetrative rainfall. The site’s surface is a combination of asphalt, gravel, and soil. About 90% of the site is directly exposed to precipitation with the remaining 10% covered by structures.

The site is divided into two primary drainage areas. The first drainage area encompasses the office, bander, sawmill, dry sheds, maintenance shop, and log and lumber storage areas. During rain events, stormwater flows south to southeast through a series of culverts and drainage ditches until it discharges through Outfall 001, which is located near the southeast corner of the site, and Outfall 003, which is located east of the dry sheds.

This second drainage area includes the log storage area, lumber planing operations, vehicle servicing and fueling area, and lumber storage. A series of surface trenches and belowground piping convey stormwater to Outfall 002 near the west part of the southern property boundary. Stormwater that leaves the property through Outfall 002 flows toward an offsite borrow pit, which discharges to the Long Tom River, a tributary of the Willamette River, which is approximately 400 – 500 yards east of the site.

The facility conducts activities indoors and outdoors.

Indoor Activities

Indoor activities include milling, product storage and vehicle maintenance.

Outdoor Activities

Outdoor activities include storage of both packaged wood products and raw material.

Per the permit, the facility is required to conduct routine monthly inspections, and quarterly visual inspections. Both the monthly and quarterly inspections are conducted by Ben Jacobs.

In December 2019, the facility submitted a Tier II Corrective Action Response for exceeding the geometric mean of the statewide benchmark for zinc. The response was submitted per Schedule A.11 of the permit. To evaluate and address the zinc exceedances the facility contracted the consulting firm:

Lean Environmental, Inc.
4500 A 15th Street East
Tacoma, Washington 98424
(425) 922-9141

Lean created a “Tier II Revised Stormwater Pollution Control Plan” after determining zinc was leaching out of the buildings’ metal roofs. As the roofs age, rust, and start to break down, they give off zinc during rainfall events. The revised SWPCP required the facility to install a passive stormwater treatment system. At the time of the inspection, implementation of the response plan was in progress. Plan implementation is due to be completed in June 2021.

VII. Laboratory Inspection

The facility has three monitored outfalls, labeled 001 – 003. For each outfall, the facility has statewide benchmark monitoring requirements, a sector specific monitoring requirement, and impaired waterbody specific monitoring requirements. The statewide benchmark parameters are pH, total suspended solids (TSS), oil & grease (O&G), total copper (Cu), total lead (Pb), and total zinc (Zn). The sector specific monitoring parameter is chemical oxygen demand (COD). The impaired waterbody specific monitoring parameters are biochemical oxygen demand (BOD), total iron (Fe), dissolved lead (Pb), and pH.

On January 7, 2020, ODEQ waived the facility’s sampling requirements for various parameters at each of its three outfalls, in accordance with Schedule B.4 of the permit. Schedule B.4 allows a facility to request a monitoring waiver after four consecutive qualifying samples show the facility is below permit benchmarks. The table below shows which parameter have been waived (W) for each outfall. The shaded blocks indicated parameters the facility continues to monitor.

Monitoring Location	Benchmark						Sector	Impairment			
	pH	TSS	O&G	Total Cu	Total Pb	Total Zn	COD	BOD	Total Fe	Dissolved Pb	pH
001		W	W	W	W			W		W	
002		W	W	W	W	W	W	W		W	
003		W	W	W	W					W	

The facility does not maintain an in-house laboratory. Except for pH, all monitored parameters are analyzed by:

Apex Laboratories, LLC
6700 Southwest Sandberg Street
Tigard, Oregon 97223
(503) 718-2323

VIII. File Review

The permit requires that documentation be retained for a minimum of three years.

I reviewed the following records and documents:

- Stormwater Pollution Control Plan (SWPCP) – certified December 29, 2017
- Permit Reissuance Letter – dated October 24, 2018
- Monitoring Waiver Letter – dated January 7, 2020
- ODEQ Warning Letter – dated February 5, 2021
- Monthly Facility Inspection Reports – March 2018 through February 2021
- Chain-of-Custody Documents – March 2018 through February 2021
- Discharge Monitoring Reports (DMRs) – February 201 through February 2021
- Annual Employee Training Records – 2018 through 2020

All requested documents were available and reviewed. I observed areas of concern in the SWPCP, the monthly facility inspection reports, and the annual employee training records. My concerns are detailed in Section X of this report.

IX. Site Inspection

Attachment A contains an aerial image, provided by Google, and a site diagram, provided by the facility. **Attachment B** contains the photos used in this inspection report and a complete photo log.

Following the records review, Mr. Zach Konnie and Mr. Ben Jacobs accompanied me on the site tour.

The facility office sits on a small hill over-looking much of the site's operations. From my position on the hill, I saw a fuel tank and decided to start the tour at that point. The three of us walked to the fuel tank. The tank (**Photos 1 & 2**) is double-walled. The tank has two compartments which allows it hold both gas and diesel. It contains up to 2,000 gallons of gasoline and 6,000 gallons of diesel.

From the fuel tank, we proceeded to the maintenance shop. Attached to the shop is a vehicle washdown pit (**Photo 3**). As seen in the photo, the pit has a quantity of standing water. Per Mr. Jacobs, water that accumulates in the pit through vehicle washing operations and rainfall events does not leave the site. Facility personnel bring in wood shavings to absorb the water. The wood shavings are then allowed to dry and hauled off-site for disposal.

We went into the maintenance shop and I spoke with Mr. Bob Clover, the facility mechanic. In addition to maintaining the facility's vehicles, Mr. Clover is responsible for conducting pH sampling. I asked Mr. Clover how often he calibrates the pH meter. He said he calibrates the meter prior to every sampling activity. I asked him if I could look at the pH meter and buffer solutions he uses to calibrate the meter. He pulled out the 4.0 and 7.0 buffer solutions (**Photo 4**) and I observed their packaging. The 4.0 buffer solution expired on October 10, 2018. The 7.0 buffer solution expired on March 8, 2019. I pointed out this observation and Mr. Clover said he would order some new buffers.

As we were leaving the maintenance shop, I observed a catch basin (**Photo 5**) near the building. The catch basin's grate was partially encircled by a filter sock. According to Mr. Jacobs, the filter sock is used to prevent sawdust and other particulate matter from entering the basin and the socks are changed out monthly. The facility maintains several catch basins throughout the site to collect and divert stormwater to the outfalls.

Finished products are stored outside while awaiting ship out (**Photo 6**) or pick up (**Photo 7**).

During the tour, Mr. Konnie told me that there was a natural spring to the north that flows across the property. The flow is channelized through culverts to pass under roadways. I asked to see where the spring outlet surfaces (**Photo 8**). The spring water flows into a depression. Once the depression is filled to a certain level, the water overflows into a pipe which leads to Outfall 002. From the spring outlet, we walked to Outfall 002 (**Photo 9**). A grab sample is collected as water overtops the sandbag. The water from Outfall 002 flows east to a grassy field. On the east side of the site, a pipe (**Photo 10**) directs flow into a ditch that leads to Outfall 001 (**Photo 11**). We continued walking to Outfall 003 (**Photo 12**). Outfall 003 was overgrown with blackberry vines and had minimal flow at the time of the inspection.

The final area I inspected was part of the changes implemented to address the zinc containing leachate flow from the rooftops. Water flows from the roof gutters (**Photo 13**) into a catch basin (**Photo 14**). The catch basin is filled with a biochar-based treatment media that removes the zinc. The stormwater then flows to the outfalls through underground piping.

X. Areas of Concern

At the time of inspection, I found the following areas of concern:

- A. Schedule A.1.j.iv of the Permit states, "Education and training must be documented and include which specific employees received training. A log of training dates must kept [sic] on-site and submitted to DEQ or agent upon request."

At the time of the inspection I reviewed the facility's SWPCP. I found the SWPCP did not contain a list of specific employees that received training or what type of training employees received.

- B. Schedule A.7.c.iii of the Permit states the SWPCP must contain an Operations and Maintenance (O&M) Plan for "...passive treatment and low impact development control measures..." which includes "...routine maintenance standards."

At the time of the inspection, the facility was using a passive treatment system but the SWPCP did not contain an O&M Plan.

- C. Schedule B.2.e.i of the Permit states the facility must "obtain accurate pH readings with a properly calibrated pH meter."

At the time of the inspection, I examined the pH probe, as well as, the 4.0 and 7.0 calibration buffer solutions. The 4.0 buffer solution expired on October 10, 2018. The 7.0 buffer solution expired on March 8, 2019.

- D. Schedule B.7.f of the Permit specifies the information required in a monthly inspection report. The requirements include "...the inspection date and time..."

At the time of the inspection, I reviewed monthly inspection reports from March 2018 through February 2021. The reports did not include the time inspections were conducted.

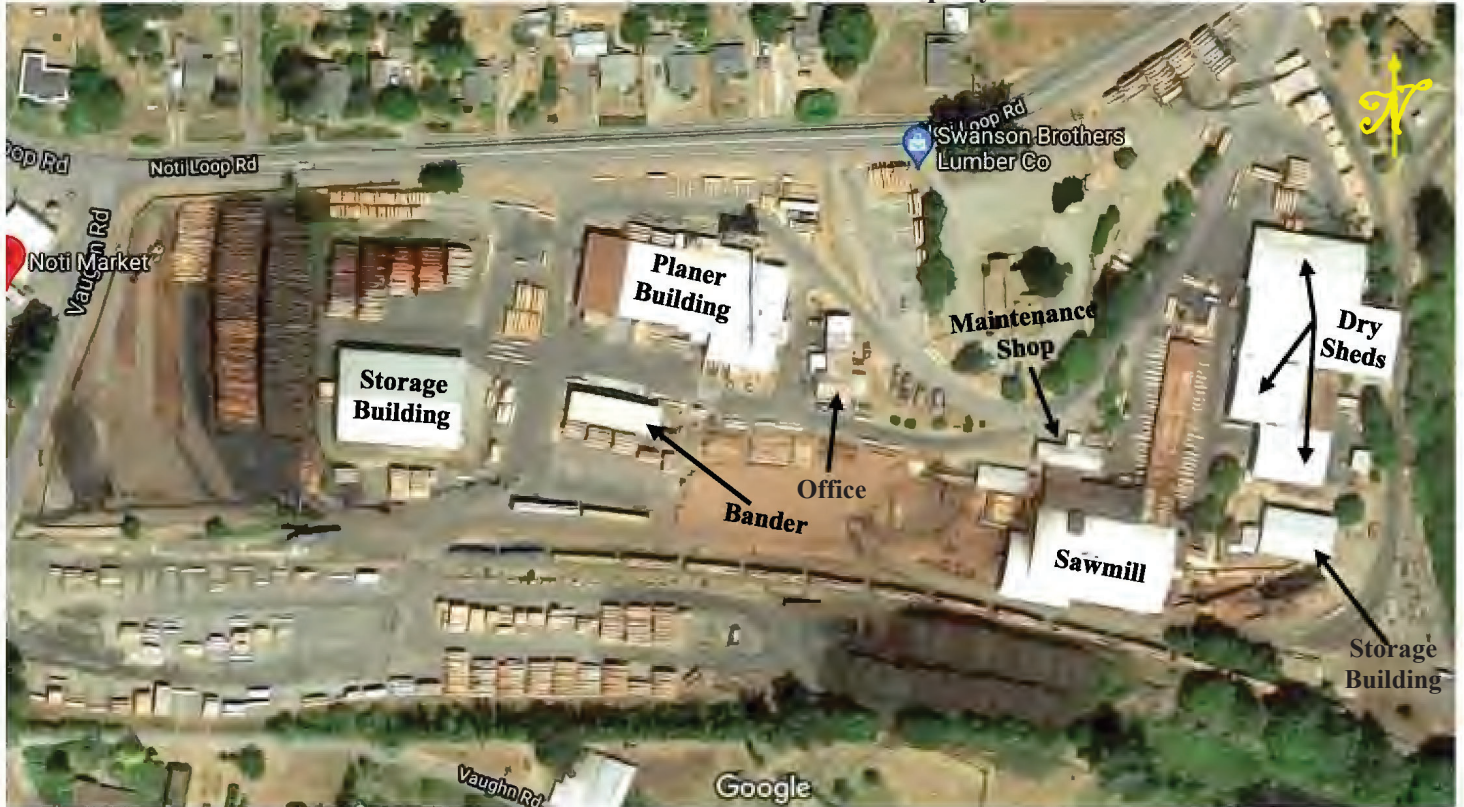
XI. Closing Conference

On May 24, 2021, I held a closing conference with Mr. Larry Konnie, Mr. Zach Konnie, and Mr. Jacobs. We discussed my observations and I gave a brief overview of the post-inspection process. I thanked them for their time and assistance.

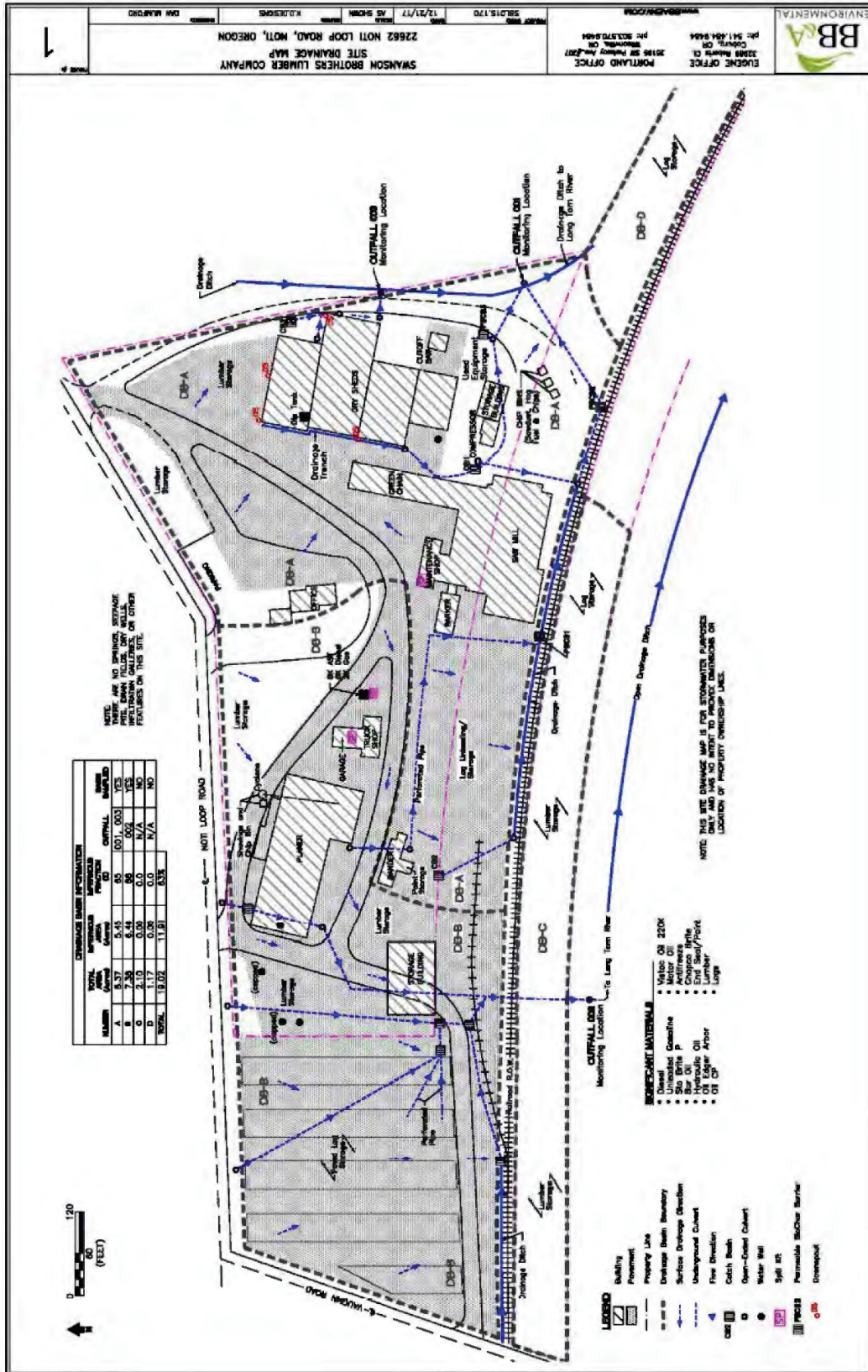
ATTACHMENT A

Aerial Image of Site Provided by Google

Swanson Brothers Lumber Company



Site Diagram Provided by Facility



ATTACHMENT B

Inspection Photographs and Photograph Log

(Photographs taken by Ray Andrews on March 24 2021 with a Panasonic DMC-FH25 camera)



Photo 1 / P1000814 – Gas/Diesel Tank, double-walled, side, facing west



Photo 2 / P1000815 – Gas/Diesel Tank, double-walled, front, facing west



Photo 3 / P1000816 – Vehicle Wash-down Area



Photo 4 / P1000819 – pH Buffer Solutions



Photo 5 / P1000820 – Catch Basin, with filter sock



Photo 6 / P1000821 – Packaged Product on Railcar



Photo 7 / P1000823 – Product, awaiting pick up



Photo 8 / P1000822 – Outlet Flow from Spring



Photo 9 / P1000824 – Outfall 2



Photo 10 / P1000825 – Drain, east side



Photo 11 / P1000827 – Outfall 1



Photo 12 / P1000826 – Outfall 003



Photo 13 / P1000828 – Outflow from Roof



Photo 14 / P1000830 – Catch Basin with Media, close-up

Complete list of photographs taken during the inspection:

- P1000804 – Permit Reissuance Letter, page 1
- P1000805 – Permit Reissuance Letter, page 2
- P1000806 – ODEQ Warning Letter, page 1
- P1000807 – ODEQ Warning Letter, page 2
- P1000808 – Monitoring Waiver Letter
- P1000809 – SWPCP Update, page 4, December 29, 2017
- P1000810 – Facility Layout 1, facing south
- P1000811 – Facility Layout 2, facing south
- P1000812 – Facility Layout 3, facing south
- P1000813 – Facility Layout 4, facing southwest
- P1000814 – Gas/Diesel Tank, double-walled, side, facing west
- P1000815 – Gas/Diesel Tank, double-walled, front, facing west
- P1000816 – Vehicle Wash-down Area
- P1000817 – pH Meter Probe
- P1000818 – pH Buffer Solutions
- P1000819 – pH Buffer Solutions
- P1000820 – Catch Basin, with filter sock
- P1000821 – Packaged Product on Railcar
- P1000822 – Outlet Flow from Spring
- P1000823 – Product, awaiting pick up
- P1000824 – Outfall 002
- P1000825 – Drain, east side
- P1000826 – Outfall 003
- P1000827 – Outfall 001
- P1000828 – Outflow from Roof
- P1000829 – Catch Basin
- P1000830 – Catch Basin with Media, close-up