

U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303
Water Compliance Inspection Report

FACILITY DATA

NPDES ID: MSR000950	Effective Date: 12/10/2020	Expiration Date: 11/30/2025
Facility Name: Gloster Chips		SIC Code: 2499
Address: 600 E Carney St / Gloster, MS 39638		
On-Site Representatives: Steven Farr, Mill Manager Scott Montablano, Procurement Manager Hood Container of Louisiana Scott.montablano@hoodcontainer.com		Responsible Official: Steven Farr, Mill Manager Gloster Chips, Inc. steven@thepricecompanies.com (601) 225-4120

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 1:45pm 03/06/2024	Exit Date/Time: 3:30pm 03/06/2024
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NAMES OF STATE INSPECTORS

MDEQ: Yang Li, Thomas Schaub
EPA LSASD: Chris McHugh, Asher Sampong

AREAS EVALUATED DURING INSPECTION (Check those areas evaluated)

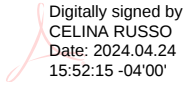
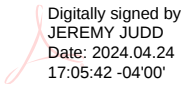
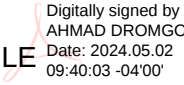
X	Permit		Self-Compliance Program		Pretreatment
X	Records		Compliance Schedule	X	Pollution Prevention
X	Facility Site Review		Laboratory	X	Storm Water
X	Effluent/ Receiving Waters	X	Operations & Maintenance		Combined Sewer Overflow
	Flow Measurement		Sludge Handling/ Disposal		Sanitary Sewer Overflow

INSPECTION SUMMARY

Facility has two NPDES permits: the Wet Deck GP (MSG170023) and the Industrial Stormwater GP (MSR000950). Since the Facility has coverage under both, its stormwater discharges are covered by the IGP, and the Wet Deck GP covers only the wastewater discharge.

INSPECTOR SIGNATURE

OFFICE/PHONE NUMBER

CELINA RUSSO  Digitally signed by CELINA RUSSO Date: 2024.04.24 15:52:15 -04'00'	USEPA Region 4/ECAD-WEB-WWES 404-562-9804
Celina Russo, Environmental Engineer	
JEREMY JUDD  Digitally signed by JEREMY JUDD Date: 2024.04.24 17:05:42 -04'00'	USEPA Region 4/ECAD-WEB-WWES 404-562-9505
Jeremy Judd, Environmental Engineer	
AHMAD DROMGOOLE  Digitally signed by AHMAD DROMGOOLE Date: 2024.05.02 09:40:03 -04'00'	USEPA Region 4/ECAD-WEB-WWES 404-562-9212
Ahmad Dromgoole, Section Chief Waterways and Wetlands Enforcement Section	

NPDES Industrial Stormwater Worksheet (Mississippi IGP)

1. FACILITY LOCATION INFORMATION

GPS Coordinates	Latitude	31° 11' 3.9" N	Longitude	91° 01 '49.8" W	
Receiving Water(s) or MS4	UT of Little Beaver Creek		Discharge to 303(d) or TMDL waters	No	
Site Acreage	~40 acres	SIC Code	2499	Weather Condition	Sunny, warm

2. STORMWATER POLLUTION PREVENTION PLAN (SWPPP) BASIC INFORMATION

PLAN TOPICS	YES	NO	N/E
SWPPP available on-site <i>SWPPP was dated 06/07/2022.</i>	ACT9.S-1(1) X		
SWPPP Certification Signature/Date <i>Signature/certification page was left blank.</i>	ACT5 T-9	X	
SWPPP modified and updated to current conditions	ACT9.S-1(4) X		
Pollution Prevention Manager/Committee <i>Team consists of the Mill Manager.</i>	ACT5.T-6(1) X		
Employee training schedule (annual) <i>Employee training is to be completed upon hire and annually thereafter.</i>	ACT5.T-6(7) & 14 X		
Site Description <i>Facility produces wood chips for the paper production industry.</i>	X		
Site Map <i>A copy of the site map, dated 2018, is shown in photo DSCN2958.</i>	ACT5-1.T-3 X		
Summary of potential pollutant sources and particular pollutants <i>Potential pollutant sources are also identified on the site map (photo DSCN2958). The pollutant assessment in the SWPPP was dated 2011, but operations have not changed substantially.</i>	ACT5.T-1 X		
Risk Identification and Material Inventory	ACT5.T-6(2) X		
Sediment and Erosion Prevention <i>SWPPP calls for gravel roads, ground cover on bare areas, and bark around the rotary crane.</i>	ACT5.T-6(3) X		
Schedule and Procedures for Good Housekeeping <i>Includes the usage of secondary containment for fuel storage.</i>	ACT5.T-6(5) X		
Preventative Maintenance Program <i>SWPPP calls for regular maintenance and periodic inspections of equipment.</i>	ACT5.T-6(4) X		
Description of Control Measures <i>Identified control measures include gravel roads; tarping down trucks; hard/soft wood storage piles; rotary crane by the log storage piles covered with bark.</i>	X		

Spill Prevention and Response Procedures	ACT5.T-6(6)	X		
Schedule & Procedures for Routine Visual Inspections <i>Inspections are to be done at least once per month.</i>	ACT5.T-8(9)	X		
Stormwater Management <i>Ponds retain water onsite. Water from the WDLS pond is reused.</i>	ACT5.T-8(10)	X		
Non-Stormwater Discharge Management	ACT5.T-8(11)	X		

3. SITE DESCRIPTION AND SWPPP

Facility is a chipper of yellow pine for clients, which includes the paper products industry. Logs are delivered via truck and stored onsite while awaiting processing. The western portion of the site is dedicated to wet decking.

The site has two permitted outfalls and coverage under two NPDES permits: the MS Industrial Stormwater General Permit and the MS Wet Deck Log Spray (WDLS) General Permit. The WDLS permit covers discharge from the facility's WDLS recirculation pond shown in photo DSCN2961. Both the recirculation pond and stormwater runoff discharge through Outfall #2. An additional retention pond near the southern end of the site discharges through Outfall #1.

4. RECORD REVIEW

RECORD REVIEW	YES	NO	N/E
Representative on-site	X		
NOI Submitted to DEQ ACT4 S-1&T-3	X		
Records of incidents with spills, leaks, pollutant releases ACT5.T-3(4) Including: dates and description of incident and the corrective actions <i>Facility maintains monthly spills sheets/logs. Forms were completed monthly for January 2018 through January 30, 2024.</i>	X		
Records of maintenance and repairs of control measures <i>Corrective actions are incorporated into the monthly inspection checklist.</i>	X		
Records of employee training ACT14 S-1 <i>Records for annual employee training with rosters completed on 11/23/2018, 11/22/2019, 12/31/2020, 12/31/2021, 12/28/2022. Training for 2023 was not completed.</i>	X		
Records of monthly site inspections ACT10.R-1 <i>Self-inspections are completed monthly using the standard form from MDEQ. The earliest recorded inspection was done on 01/28/2021 and the most recent inspection was completed on 01/31/2024. Inspections for 2023 were completed on the following dates: 01/31, 02/28, 03/31, 04/30, 05/31, 06/30, 07/31, 08/31, 09/30, 10/31, 11/30, and 12/30.</i>	X		
Records of monthly visual jar test ACT10.R-1 For inspections conducted during storm event <i>Records were available for 01/28/2021 through 01/31/2024, with the form being completed on a monthly basis. "No discharge" was always reported.</i>	X		
Records of ANNUAL Comprehensive SWPPP Evaluation ACT10.R-2			X

<i>Not available onsite. Facility personnel believe that the regional managers complete the annual evaluation and corresponding form.</i>				
SPCC <i>Not required. Facility reports not meeting storage capacity requirements for SPCC. A regular inventory log is completed.</i>				X
Illicit Connects Evaluation Certification		ACT5.T-7(8)		X

5. FIELD EVALUATION & PLAN IMPLEMENTATION	
Pollutant Sources	Note location, quantitative description, design issue, O&M deficiencies, and pollutants offsite
Loading/Unloading Area	<i>Both incoming logs and finished products are shipped via truck.</i>
Outdoor Storage	<i>Logs are stored in the northern end of the site (see photo DSCN2973) and around the radial crane. Logs in wet storage are kept on the western end of the site, which is dedicated to wet decking (see for example photo DSCN2961). Chips awaiting shipment are stockpiled outdoors, as shown in photo DSCN2963 and DSCN2974. Front end loaders then move chips into trucks.</i>
Stormwater Management	<i>The western end of the site is dedicated to wet decking and wet storage. Runoff from this area drains back into the WDLS recirculation pond for reuse. When the recirculation pond needs to be lowered, the low level drain discharges into the mid-site swale as shown in photo DSCN2962 before discharges via Outfall #2 (see photo DSCN2959). Discharge from the recirculation pond is permitted as a wastewater discharge under the WDLS General Permit.</i> <i>The mid-site drainage feature, shown in photos DSCN2960 and DSCN2975, discharges stormwater through Outfall #2, as permitted under MDEQ's IGP. This conveyance receives runoff from the processing area (see photo DSCN2976-2977).</i> <i>The retention pond, located near the main office and shown in photo DSCN2966 discharges to Outfall #1 via the conveyance shown in photos DSCN2964-2965 and DSCN2967. The drainage system around the rotary crane, which begins at the location shown in photo DSCN2972, flows into one of two concrete detention basin (photos DSCN2969-2971) before discharging into the retention pond as shown in photo DSCN2968.</i>
Outdoor Manufacturing/ Processing Operations	<i>Outdoor processes include wet decking, debarking, and chipping. The area around the chipper drains into the mid-site swale, as shown in photos DSCN2976-2977.</i>
Treatment/Storage/Disposal Areas	<i>By-product is sold as a final product. For example, tree bark is used in mulch products.</i>
Sediment & Erosion Controls (BMPs)	<i>The control measures identified in the SWPPP were in use in the field. As shown in photo DSCN2972, roads were gravel.</i>

Spills / Leaks Handling / Good Housekeeping

Sawdust around the chipper is cleaned on a weekly basis. According to facility personnel, the concrete basin shown in photo DSCN2969 was recently cleaned (c. November 2023) and the basin shown in photo DSCN2971 is scheduled to be cleaned out later that week.

Fuel/diesel, oils (hydraulic/motor), and DEF tanks are stored indoors in the shed shown in photo DSCN2978. This is consistent with the SWPPP. Total storage capacity of oil products does not trigger SPCC requirements.

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

	YES	NO	DESCRIPTION
Number & location of stormwater discharge(s)/outfall(s) consistent with SWP3	X		<i>There are two permitted outfalls, consistent with those shown in the site map (see photo DSCN2958). Outfall #1 (photo DSCN2964) discharges overflow from the southern retention pond and Outfall #2 discharges runoff from the drainage feature shown in photo DSCN2960 and also occasionally from the WDLS recirculation pond, which is permitted separately under the WDLS GP.</i>
Evidence of off-site accumulation of pollutants in receiving water		X	<i>None observed.</i>
Other discharges or potential discharges off-site (not through permitted outfalls)		X	<i>None observed.</i>
Non-stormwater discharge		X	<i>None observed.</i>

Exit interview conducted with: Mr. Farr and Mr. Montalbano

Preliminary findings discussed during the exit interview included:

- *All records of the monthly visual jar tests report “no discharge.” However, Outfall #1 appeared to be discharging at the time of the inspection. Even if water only discharges during or following a rain event, this still qualifies as a discharge.*

Photo Log is attached.