



NPDES Compliance Inspection Report

Propak Corporation - Boise Caldwell, Idaho

NPDES Permit Tracking Number
IDR050264

Inspection Date: May 23, 2023

Prepared by:

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U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Surface Water Enforcement Section

Inspector Signature/Date:

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Supervisor Signature/Date:

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ATTACHMENT A - Aerial Image (Google Earth)

ATTACHMENT B - SWPPP Site Layout and Drainage Maps

ATTACHMENT C - Photograph Log

ATTACHMENT D - EPA Letter for Additional Impaired Waters Monitoring

ATTACHMENT E - Post Inspection Correspondence

[Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Will Murkle or from observations made during the inspection.]

I. Facility Information

Facility Name:	Propak Corporation - Boise
Facility Address:	1517 Smeed Parkway Caldwell, Idaho 83605
Facility Operator:	Pallet Logistics of America retaining 3 rd party operations of Propak Corporation 3939 Beltline Road Addison, Texas 75001
Facility Owner:	Strider Group, LLC/Badger Creek Investments, LLC P.O. Box 14001-363 Ketchum, ID 83340
Facility Contact(s):	William Murkle Plant Manager wmurkle@propak.com 208-629-2434
Latitude/Longitude:	N 43.6567 W – 116.6419
NPDES Tracking Number:	IDR050264
NAICS Code(s):	Not Applicable
SIC Code(s):	2448 (Wood Pallets and Skids)
Facility Size:	8.7 acres (3.5 acres exposed to stormwater)

II. Inspection Information

Inspection Date:	May 23, 2023
Inspector(s):	Vanessa Oquendo EPA Region 10, ECAD / SWES Alexia Berlanda Idaho Department of Environmental Quality, Boise Office
Arrival Time:	09:05 AM

Departure Time: 1:02 PM

Weather: Mostly cloudy; moderate temperature

Purpose: To evaluate compliance with the requirements of the Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activities.

III. Permit Information

Propak Corporation - Boise (hereinafter referred to as the “Facility”) is a wood pallet refurbishing facility that serves as third party management for Pallet Logistics of America (“PLA”). Badger Creek Investments, LLC owns the Facility’s property. PLA bought the Facility in 2022, but there has been no change in operations, which is conducted by the Facility acting as the operator and permittee under EPA’s Industrial Stormwater General Permit (MSGP). The permit tracking number assigned to the Facility is IDR050264. The Facility did not bear the required public sign illustrating permit coverage at its main entrance.

The current version of the MSGP became effective on March 1, 2021 and is set to expire on February 28, 2026. The Facility had coverage under the previous version of the Permit (2015 MSGP). The Facility submitted a new Notice of Intent (NOI) for continued permit coverage on April 27, 2021.

Permitting authority was transferred from EPA Region 10 to Idaho Department of Environmental Quality (IDEQ) on July 1, 2021, as IDEQ became the delegated authority for General NPDES Stormwater Permits under Phase IV of the scheduled transfer.

The Facility is subject to the sector specific requirements of Part 8, Subpart A – Sector A, Subsector A4 of the MSGP (Timber Products – Wood Pallets and Skids). The requirements include quarterly standard benchmark monitoring for Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) and additional quarterly impaired waters monitoring for Total Suspended Sediments, *E. coli*, and Total Phosphorus. Any exceedances in standard benchmark monitoring or impaired waters monitoring parameters would trigger Additional Implementation Measures (AIM).

IV. Facility Background

Propak Corporation, located in Caldwell, ID, is a repairing and refurbishing facility of wood pallets that are shipped out for resale or reuse by various markets. The Facility is operated by Propak Corporation - Boise and owned by Badger Creek Investments, LLC. The Facility was purchased by PLA but retained operations. The Facility operates Monday through Friday with 22 employees in single shifts from 6:00AM to 2:30PM,

except on Thanksgiving and Christmas. The Facility has been in operation since May of 2018, and there have been no changes to overall site layout since then.

The Facility encompasses approximately 8.7 acres. See **Attachment A**, Aerial Photo (Google Earth). Asphalt and concrete paving cover approximately 90% of the Facility's impervious surfaces. According to the Facility's NOI, none of these paved surfaces will be sealed or re-sealed with coal-tar sealcoat where industrial activities are located during coverage under the MSGP. Primary structures include a main repair and refurbishment plant, loading/unloading areas, shipping and receiving areas, and outdoor storage areas. Primary Facility activity is wood pallet repaired and refurbished on-site to be shipped out for sale and distribution. No sales occur at the Facility. Processes include cutting or sawing, compressing wood waste, and painting. Wood pallets in need of repair are sorted at the Facility and go through multiple repair and refurbishment stages in mechanical assembly line fashion with employees conducting most of the repair work by hand at various stages until final repaired and painted pallets are produced and ready for shipping. The Facility repairs approximately 1,200 to 1,300 pallets per day. All wood working and repair activities take place indoors. No chemical wood treatment or heat treatment takes place at the Facility. No vehicle or equipment maintenance including cleaning and wash downs are conducted at the Facility.

According to the Facility's Stormwater Pollution Prevention Plan (SWPPP), submitted post-inspection, the Facility can be divided into six "Areas" to simplify and reference potential pollutant sources. See **Attachment B, Site Layout with Drainage**. Primary stormwater on-site collects and originates from the main building's rooftop and paved surface sheet flow such as parking area, loading and unloading areas, shipping and receiving areas, and outdoor storage areas. According to the Facility's SWPPP site map onsite and its updated SWPPP sent post-inspection, the total site size is 8.7 acres. According to the Facility's NOI, the estimated area of industrial activity at the Facility exposed to stormwater is 3.5 acres. Each of the six Areas represent six outfalls each of which represent different areas and activities that all discharge to "A Drain" which flows 2.5 miles North and discharges into Mason Creek, which flows North 1.2 miles and discharges into the Boise River. According to EPA's Additional Impaired Waters Monitoring letter dated May 19, 2021 (**Attachment D**), the Facility discharges into Mason Creek, which is part of the Total Daily Maximum Loads (TMDLs) that IDEQ has established for the Lower Boise River watershed for the parameters listed in permit information above.

According to Mr. Murkle, the Facility was previously inspected by an entity from Oregon but did not recall the inspection's purpose. EPA has not inspected the facility previously for MSGP compliance according to EPA's Enforcement and Compliance History Online (ECHO).

V. Inspection Chronology

This was an announced inspection. On Monday May 15, 2023, I emailed Ms. Michelle McCurry, Director of Risk Management, who certified the Facility's April 2021 NOI announcing the routine inspection for Tuesday May 23, 2023 at 9:00AM, and that I would be accompanied by an IDEQ inspector. Ms. McCurry responded to my email the

same day referring me to Mr. Will Murkle, Plant Manager, whom I would coordinate the inspection with. Mr. Murkle responded to the email on Tuesday May 16, 2023 confirming his availability for the inspection at 9:00AM on May 23, 2023.

Upon arriving on-site, Ms. Alexia Berlanda (IDEQ) and I made our way to the Facility's main office through the parking lot where we met with Mr. Murkle and began the inspection.

The inspection consisted of an opening conference, a walk-through of the Facility's general operations and stormwater areas, a records review, and ended with a closing conference. We were accompanied by Mr. Murkle throughout the inspection.

VI. Opening Conference

Opening conference began at 9:05AM.

The opening conference was held with Mr. Will Murkle shortly after our arrival. We had our initial introductions; Ms. Berlanda and I presented our inspector credentials to Mr. Murkle and discussed the purpose and scope of the inspection. During the opening conference Mr. Murkle provided a general background of the Facility operations, current staffing, and general stormwater management responsibilities.

VII. Site Review

The Facility's primary industrial activity is the repair and refurbishment of wood pallets through processes and activities described above. All of the Facility's repair and refurbishment activities occur indoors with no exposure to precipitation (rain or snow). Industrial activities exposed to rainfall include the loading and unloading of raw materials, transport of raw and finished products, vehicle traffic, debris/trash associated with the dumpsters and hoppers, and outside storage of wood, pallets in need of repair, and repaired pallets. According to the Facility's SWPPP, associated pollutants associated with the Facility's activities include particulates, dust, water-based paint residue, and vehicle fluids such as oil and grease. Loading and unloading activities occur on the eastern side of the main building. Outdoor storage generally occurs on the northern, southeastern, and southern parts of the Facility but all outdoor storage is uncovered. Vehicle traffic occurs in the loading and unloading areas, main parking lot, and trailer lot.

As mentioned earlier in this report, the Facility identified six discharge points, all of which are stormwater drains located around the Facility which all discharge to "A Drain" which subsequently discharges into Mason Creek as part of the Lower Boise River watershed.

The Facility contracts with Analytical Laboratories, Inc located in Boise, ID or with Eurofins Environment Testing located in Canton, OH for analysis of their stormwater sampling. All stormwater impacted areas were toured as part of the inspection walk-through. See **Attachment C**, for a photograph log of pictures taken during the site walk-through. The Facility has identified three sampling locations – one for Areas 1 and 2 (outfalls 001 and 002) sampled at outfall 001 located at the storm drain on the

southeastern side of the Facility where stormwater may come from rooftops, outdoor storage, uncovered dumpsters and hoppers, and vehicle traffic; one for Area 3 (outfall 003) sampled at outfall 003 located at the vegetative swale on the northern side of the Facility where stormwater may come from rooftops, outdoor storage and vehicle traffic; and one Areas 4, 5, and 6 (outfalls 004, 005 and 006) sampled at outfall 006 located at the storm drain on the southeastern corner of the Facility's main building where stormwater may come from rooftops, outdoor storage, uncovered dumpsters and hoppers, and vehicle traffic.

We began the facility walkthrough with Mr. Murkle starting at the Facility's main parking lot. Stormwater from the parking lot enters into two storm drains identified as outfall 004 and outfall 005 (**Photo 1 & Photo 3**). The parking lot generally slopes to these drains/outfalls. We walked toward outfall 005 and observed a worn sock and witch's hat in the drain cover as stormwater control measures, but they could benefit from replacement (**Photo 1**). We continued North along the parking lot to outfall 004. We walked past a food truck on the way to outfall 004 that periodically comes to the Facility during lunch hours that can be a potential source of oil and grease that stormwater can come into contact with (**Photo 2**). At outfall 004 we observed worn witch's hat in the drain cover and barrier material as stormwater control measures, but they could benefit from replacement (**Photo 3**). When I asked Mr. Murkle where stormwater went after entering these outfalls, he did not know for sure but reasonably assumed stormwater discharged to "A Drain" as described in the old SWPPP he had on site. Outfalls 004 and 005 are identified as substantially identical discharges (SIDs) and are both SIDs to outfall 006. According to the Facility's updated SWPPP, sampling for outfalls 004 and 005 is conducted at outfall 006 since all three of those outfalls are SIDs. According to the 2021 MSGP, SIDs can be identified if discharge points have the potential for stormwater exposure to the same pollutants. Based on the Facility's site map in its updated SWPPP, it is possible for stormwater in Areas 5 and 6 (outfalls 005 and 006) to come into contact from potential outdoor storage pollutants, whereas stormwater in Area 4 (outfall 004) may not come into contact with outdoor storage based on drainage direction (depicted by arrows on the SWPPP site map). Therefore, sampling at outfall 006 may not be representative of discharges at outfall 004.

We continued walking North to observe the northern part of the Facility where we observed the trailer lot. Trailer on site appeared well maintained and free of leaks (**Photo 4**). We observed the northern perimeter of the Facility that was a vegetative swale serving as outfall 003 (**Photo 5**) that receives stormwater from parking lot and trailer lot sheet flow. This outfall was identified by the Facility for possible removal as an outfall as upon closer examination, it did not appear there was anywhere else for stormwater to discharge to other than infiltrate into the ground. Sampling for outfall 003 is conducted by hand as a grab type sample from any standing water in the swale using a cup that is then placed in a cooler to be sent to a lab for analysis.

We then walked to the northeastern corner of the Facility to observe some of the shipping and receiving (loading and unloading) docks. We observed a smaller circular shaped covered drain in this part of the Facility (**Photo 6**). I asked Mr. Murkle what the drain is for and where stormwater went, and he was not entirely certain but reasonably assumed stormwater entering that drain discharges into "A Drain". We proceeded South and came

across 2 additional and unknown manhole stormwater drains that were not identified as outfalls at the Facility (**Photo 7**). These unknown drains contained standing water, but Mr. Murkle was not sure where the water in these drains discharge to, but reasonably assumed it discharged to “A Drain”. From these unknown drains, we then walked East approximately 35 feet to observe outfall 002. At outfall 002, we opened the drain cover and observed a worn witch’s hat as a stormwater control that could benefit from replacement, and this outfall showed signs of receiving insufficient drainage (**Photo 8**). We continued walking South on the eastern part of the Facility to outfall 001 (**Photo 9**). Approximately 35 feet West of outfall 001 was another pair of the same unknown manhole type stormwater drains as observed by outfall 002. When I asked Mr. Murkle where stormwater went after entering outfalls 001 and 002, he did not know for sure but reasonably assumed stormwater discharged to “A Drain” as described in the old SWPPP he had on site. Outfalls 001 and 002 are identified as SIDs. According to the Facility’s updated SWPPP, sampling for outfalls 001 and 002 is conducted at outfall 001 since both of those outfalls are SIDs. However, Mr. Murkle explained that outfall 001 also does not receive sufficient drainage and instead samples for outfall 001 from one of the mystery manhole stormwater drains 35 feet away (see **Photo 7**; mystery drains the same at outfalls 001 and 002). The Facility may benefit from identifying outfalls 001 and 002 as the mystery manhole storm drains to ensure sampling at those mystery storm drains would be representative of where measurable stormwater discharges assuming discharge into the mystery storm drains subsequently discharge to the same waters.

Midway down the eastern perimeter of the Facility’s main building, we also observed a loading/unloading area next to some stairs with debris on the ground that may lead to possible tracking (**Photo 10**), though no obvious visible signs of track out was observed throughout the Facility. As part of the Facility’s best management and housekeeping practices described by Mr. Murkle, Propak staff sweep the Facility grounds weekly.

Along the southeastern perimeter of the Facility, we observed uncovered outdoor storage of pallets that need to be repaired or otherwise processed (**Photo 11**). Mr. Murkle indicated pallets are not washed down nor chemically treated or coated and did not have concerns about the pallets’ exposure to the elements as the pallets are not stored outside very long before they come indoors for processing. We continued to walk to the southeastern corner of the Facility where we observed a fenced off/barricaded entrance and exit point (**Photo 12**). Mr. Murkle indicated this entrance and exit point was blocked off to discourage regular vehicle traffic from driving through the Facility grounds as a safety measure to protect employees from potentially getting hit by vehicles. Mr. Murkle has never observed stormwater leaving the Facility at this entrance and exit point. Based on the Facility’s updated SWPPP and drainage arrows, Areas 1 and 6 could potentially drain out this entrance and exit point, but there are no stormwater control measures to ensure stormwater would not leave the Facility via the southeastern entrance/exit.

Just west of the southeastern perimeter’s blocked entrance and exit point, we observed an uncovered trash hopper (**Photo 13**). Trash is held in the hopper temporarily and then dumped into the bigger dumpster located at the southeastern corner of the Facility’s main building (**Photo 15**). A portion of the Facility’s gravel spit that runs along the southern perimeter also was observed behind the trash hopper (**Photo 13**). The gravel spit had light scattered debris. We then observed the large, uncovered dumpster and temporary

uncovered outdoor storage/staging of pallets and found the immediate surrounding area to be free and clear of debris (**Photo 15**). The Facility's large dumpster is emptied and taken offsite for proper disposal twice a week by Allied Waste Service. We observed outfall 006 with worn sock and witch's hat and could benefit from replacement as there was debris inside and outside this storm drain, and the worn sock and witch's hat may not properly function to filter debris and particulates (**Photo 14**). When I asked Mr. Murkle where stormwater went after entering this outfall, he did not know for sure but reasonably assumed stormwater discharged to "A Drain" as described in the old SWPPP he had on site. Outfall 006 was identified as an SID to outfalls 004 and 005. Outfall 006 is where sampling occurs to represent all three outfalls as SIDs, however as already mentioned, sampling at outfall 006 may not be representative as an SID to outfall 004.

We continued walking down the southern part of the main building and observed outdoor storage of propane tanks (**Photo 16**). The propane tanks are stored outside for safety due to their flammability. The tanks are checked monthly by Mr. Murkle's supervisor and weekly during Ferrel Gas fill-ups. We then walked by a southern loading and unloading area with minor signs of possible vehicle tracking (**Photo 17**).

We proceeded to the southwestern entrance and exit point of the Facility where we observed another unknown storm drain containing debris (**Photo 20**). There was no visible water inside the drain, suggesting that it may not receive sufficient drainage (**Photo 19**) from the western and southern parts of the Facility (**Photo 18**). Mr. Murkle did not know where stormwater went if it entered this drain, and it is not considered as an outfall for the Facility. The southwestern entrance and exit point could potentially receive drainage from the southern part of the Facility based on drainage arrows on the SWPPP site map, but this entrance and exit point did not have any stormwater controls to prevent stormwater from exiting the Facility onto Smeed Parkway (**Photo 21**). Mr. Murkle conveyed that he's never observed stormwater leave the Facility at any entrance and exit point, and that the Facility receives little rain/precipitation.

We then went inside the main building where the repair plant is located. We observed how pallets are sorted, examined, stacked, repaired by hand, sawed as necessary, and finally painted in assembly line fashion (**Photo 22 and Photo 24**). Concentrated paint was contained in large totes with secondary containment and was water filtered and recycled within the tote (**Photo 24**). The Facility maintained a proper spill kit near the start of the assembly line (**Photo 23**). The Facility had empty gas tanks/containers inside the main plant that were going to be filled and then stored in a flammable locker (**Photo 25**). We then proceeded back to the main building's conference room where we completed a records review and held the closing conference.

VIII. File Review

The following documents were reviewed as part of this inspection:

- Multi-Sector General Permit – The Facility did not have the most current permit (2021 MSGP) on site.

- Notice of Intent (NOI) – The Facility’s most recent NOI was reviewed prior to the inspection. It was certified by Ms. McCurry on 04/27/2021.
- Annual Reports – Prior to the inspection, permit required annual reports were reviewed. Years reviewed included 2019, 2020, and 2021. Only the 2020 annual report was submitted timely, but all annual reports contained routine inspection and quarterly visual assessment dates and summarized corrective actions.
- Stormwater Pollution Prevention Plan (SWPPP) – A copy of the SWPPP was available for review at the time of inspection, however it was outdated from February of 2018. An updated electronic copy of the SWPPP was submitted to EPA on July 7, 2023 and reviewed post-inspection. The SWPPP onsite was initially prepared in February of 2018 by Tetra Tech, Inc, a third-party consulting and engineering firm located in Atlanta, Georgia. The 2018 SWPPP did not contain record of documented updates until a new SWPPP was electronically sent to EPA. The updated SWPPP dated May of 2021 also was prepared by Tetra Tech, Inc and was generally current with the requirements of the 2021 MSGP with exceptions of some missing information identified in Areas of Concern below.
- Site Inspection Reports – The Facility documents completed quarterly routine site inspections. I reviewed quarterly site inspection reports completed in 2019 through May of 2023 and found the Facility’s form to be effective in documenting these inspections (**Photo #** as an example). I suggested to Mr. Murkle to ensure any remedies or corrective actions conducted during a routine site inspection to be described on the Facility’s inspection form regardless of how minor or major the corrective action was.
- Quarterly Visual Assessment Documentation – I reviewed the Facility’s records of completed visual observations on sampling and observations worksheets (**Photo #** as an example) from 2019 through May of 2023 and found the documentation to be adequate.
- Quarterly Stormwater Monitoring Results – Post inspection, I reviewed the Facility’s discharge monitoring reports (DMRs) that were submitted quarterly to IDEQ per the MSGP, years reviewed included 2018-present. The Facility did not have electronic nor hard copy records of DMRs because they were prepared and submitted by Ms. McCurry from an offsite office in Arkansas. I reviewed analytical lab reports (submitted post-inspection) and compared the analytical report values to the reported DMR values. EPA’s online database indicates non-receipt DMR violations for the failure to submit impaired waters monitoring for malathion, chlorpyrifos, and temperature for the monitoring periods ending on 5/31/2019, 5/31/2020, and 6/30/2022 for all applicable outfalls (001, 003, and 004). The Facility indicated in its May 2021 SWPPP that malathion and chlorpyrifos were tested in May of 2019 and those pollutants were not detected. However, those results were not reported in the required DMR. The Facility failed to submit DMRs for benchmark monitoring for monitoring periods ending on 9/30/2018, 12/31/2018, 3/31/2019, 6/30/2019, 9/30/2021, 12/31/2021, 3/31/2022 and 6/30/2022 for all applicable outfalls (001, 003, and 004) except that a DMR was submitted for benchmark monitoring for the

monitoring period ending on 12/31/2021 for Outfall 004. The Facility also failed to submit DMRs for impaired waters monitoring for total suspended sediments, *E. coli*, and total phosphorus for the monitoring periods ending on 9/30/2021, 12/31/2021, 3/31/2022, and 6/30/2022 for all applicable outfalls (001, 003, and 004) except that a DMR was submitted for impaired waters monitoring for the monitoring period ending on 12/31/2021 for Outfall 004. However, the Facility submitted additional benchmark and impaired waters monitoring DMRS to IDEQ for Outfalls 001, 003, and 004 for monitoring periods ending on 9/30/2022, 12/31/2022, and 3/31/2023 when most likely they were not required to be submitted based on the 2021 MSGP's benchmark monitoring schedule and EPA's May 2021 impaired waters monitoring letter.

The review of the DMRs identified sector specific benchmark exceedances during the following quarters (Q):

- 2023
 - 1 exceedance of Total Suspended Solids (Q1) – additional implementation measures would not be triggered until an annual average for 2023 is determined.
- Post Inspection Correspondence – Post inspection, I emailed Ms. McCurry requesting various documents such as an updated SWPPP, laboratory analysis sheets and additional information on the Facility's storm drain system and where discharges on site go to be submitted by June 23, 2021. On June 21, 2021 at 8:09AM, I fielded a call from a contractor assisting Ms. McCurry with SWPPP examination and analysis of the Facility's storm drain inquiry. I provided Ms. McCurry an extension to July 7, 2023 given that the contractor required additional time to work with the City of Caldwell, Idaho to better ascertain the storm drain system. On June 29, 2021, Ms. McCurry emailed me with a Notice of Termination and a supporting map attached that was submitted to IDEQ for processing. Ms. McCurry informed me that City of Caldwell drawings confirmed there was an underground shallow well stormwater injection system and that stormwater did not discharge out of the Facility. See **Attachment E** for post inspection correspondence and Notice of Termination.

IX. Areas of Concern

Observations during the inspection and post inspection communication and additional records review identified the following areas of concern (see **Attachment D** for post inspection correspondence detailing corrective actions the Facility has taken):

A. Representative Sampling

Section 4.1 of the 2021 MSGP describes the monitoring procedures that are required of each discharge point. Section 4.1.1 of the permit states that “applicable monitoring requirements apply to each discharge point...”

Additionally, Section 4.1.1 states that “applicable monitoring requirements apply to each discharge point authorized by this permit” and if the “facility has two or more discharge points that you believe discharge substantially identical stormwater

effluents, based on the similarities of the general industrial activities and control measures, exposed materials that may significantly contribute pollutants to stormwater, and runoff coefficients of their drainage areas, you may monitor the effluent of just one of the discharge points and report that the results also apply to the SIDP(s)”.

The Facility’s current SWPPP stated outfalls 004 and 005 are identified as substantially identical discharges (SIDs) and are both SIDs to outfall 006. Sampling for outfalls 004 and 005 is conducted at outfall 006 since they are all SIDs. Based on drainage direction depicted on the SWPPP site map, it is possible for stormwater discharged to outfalls 005 and 006 to contact with potential outdoor storage pollutants, whereas stormwater discharged to outfall 004 may not contact with outdoor storage. Therefore, sampling at outfall 006 may not be representative of discharges to outfall 004.

Additionally, outfalls 001 and 002 are identified as SIDs and sampled at outfall 001. However, outfall 001 does not receive sufficient drainage and instead sampling occurs at an unknown manhole stormwater drain 35 feet away from outfall 001, which may not be representative of where the Facility identifies the outfall 001’s discharge point.

On June 29, 2021, the Facility submitted a Notice of Termination and a supporting map attached to IDEQ for processing. City of Caldwell drawings confirmed there was an underground shallow well stormwater injection system and that stormwater did not discharge out of the Facility, hence representative sampling may no longer be a concern. See **Attachment E** for post inspection correspondence and Notice of Termination.

B. Good Housekeeping

Section 2.1.2.2 of the 2021 MSGP states that you must “keep clean all exposed areas that are potential sources of pollutants. You must perform good housekeeping measures in order to minimize pollutant discharges...”

Additionally, Section 2.1.2.2.c states that dumpsters that do not have lids and could leak, “ensure that discharges have a control (e.g., secondary containment)”.

During the inspection we observed some light debris in different areas of the Facility grounds despite the Facility’s weekly sweeping. The large garbage dumpster did not have a lid and is uncovered at the Facility. Exposed debris in the dumpster has the potential to intercept with stormwater.

On June 29, 2021, the Facility submitted a Notice of Termination and a supporting map attached to IDEQ for processing. City of Caldwell drawings confirmed there was an underground shallow well stormwater injection system and that stormwater did not discharge out of the Facility, hence debris discharging with stormwater from insufficient housekeeping may no longer be a concern. See **Attachment E** for post inspection correspondence and Notice of Termination.

C. Offsite Tracking

Section 2.1.2.2 of the 2021 MSGP states that you must “minimize generation of dust and off-site tracking of raw, final, or waste materials in order to minimize pollutants discharged via stormwater.” Additionally, Section 3.1.3.3 states that you must look out for “offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site.”

During the inspection, we observed a food truck in the Facility’s main parking area. Although no leaks were observed on the food truck, if it had any vehicle-related leaks during future Facility visits, it could track the leaks back off site.

The southern loading and unloading area also showed minor signs of possible vehicle tracking that can potentially continue offsite when vehicles exit at the Facility’s southwestern entrance/exit point.

On June 29, 2021, the Facility submitted a Notice of Termination and a supporting map attached to IDEQ for processing. City of Caldwell drawings confirmed there was an underground shallow well stormwater injection system and that stormwater did not discharge out of the Facility, hence offsite tracking may no longer be a concern. See **Attachment E** for post inspection correspondence and Notice of Termination.

D. Insufficient Stormwater Control Measures

Section 2.1. of the 2021 MSGP states that you must “select, design, install, and implement stormwater control measures to minimize pollutant discharges that address the selection and design considerations in Part 2.1.1, meet the non-numeric effluent limits in Part 2.1.2, meet limits contained in applicable effluent limitations guidelines in Part 2.1.3, and meet the water quality-based effluent limitations in Part 2.2.” Parts 2.1.1 – 2.1.8 further describe considerations that must be addressed when selecting and designing control measures.

Outfalls at the Facility had worn socks and witch’s hats and required replacement to properly function as intended.

The fenced off/barricaded entrance and exit point on the southeastern corner of the Facility could potentially receive drainage from Areas 1 and 6 based on the Facility’s SWPPP site map, but the area did not have any stormwater controls to keep stormwater in the Facility. Although Mr. Murkle has never observed stormwater leaving the Facility at this entrance and exit point, it might be possible during a major storm event and as much discharge prevention as possible is in the spirit of the permit.

The southwestern entrance and exit point could potentially receive drainage from the southern part of the Facility based on drainage arrows on the SWPPP site map, but

this entrance and exit point did not have any stormwater controls to prevent stormwater from exiting the Facility.

On June 29, 2021, the Facility submitted a Notice of Termination and a supporting map attached to IDEQ for processing. City of Caldwell drawings confirmed there was an underground shallow well stormwater injection system and that stormwater did not discharge out of the Facility, hence insufficient stormwater control measures may no longer be a concern. See **Attachment E** for post inspection correspondence and Notice of Termination.

E. Preventing Leaks or Spills from Food Truck

Section 2.1.2.4.d of the 2021 MSGP states that you must “minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur in order to minimize pollutant discharges”.

During the inspection, we observed a food truck in the Facility’s main parking area. Although no leaks were observed on the food truck, if it had any vehicle-related leaks during future Facility visits, pollutants could contact with stormwater and subsequently discharge at outfall 004 or 005.

On June 29, 2021, the Facility submitted a Notice of Termination and a supporting map attached to IDEQ for processing. City of Caldwell drawings confirmed there was an underground shallow well stormwater injection system and that stormwater did not discharge out of the Facility, hence potential leaks from the food truck may no longer be a concern. See **Attachment E** for post inspection correspondence and Notice of Termination.

F. Failure to Monitor and/or Failure to Submit DMRs

Section 4.2. of the 2021 MSGP describes the monitoring requirements that may be applicable to “each discharge point,” including indicator monitoring and benchmark monitoring, and impaired waters monitoring. Applicable monitoring data, including reporting “no discharge” for a given quarter must be submitted to EPA/IDEQ in the form of a Discharge Monitoring Report (DMR).

The Facility failed to submit DMRs for benchmark monitoring for monitoring periods ending on 9/30/2018, 12/31/2018, 3/31/2019, 6/30/2019, 9/30/2021, 12/31/2021, 3/31/2022 and 6/30/2022 for all applicable outfalls (001, 003, and 004) except that a DMR was submitted for benchmark monitoring for the monitoring period ending on 12/31/2021 for outfall 004. The Facility also failed to submit DMRs for impaired waters monitoring for total suspended sediments, *E. coli*, and total phosphorus for the monitoring periods ending on 9/30/2021, 12/31/2021, 3/31/2022, and 6/30/2022 for all applicable outfalls (001, 003, and 004) except that a DMR was submitted for impaired waters monitoring for the monitoring period ending on 12/31/2021 for outfall 004. Additionally, the Facility’s current SWPPP indicated that outfalls 004, 005, and 006 were SIDs and monitoring is conducted at outfall 006. However, the Facility did not

submit DMRs specifically for outfall 006, but instead used outfall 004 to monitor the SIDs.

The southwestern entrance and exit point could potentially receive drainage from the southern part of the Facility based on drainage arrows on the SWPPP site map, but this entrance and exit point did not have any stormwater controls to prevent stormwater from exiting the Facility.

On June 29, 2021, the Facility submitted a Notice of Termination and a supporting map attached to IDEQ for processing. City of Caldwell drawings confirmed there was an underground shallow well stormwater injection system and that stormwater did not discharge out of the Facility, hence failure to monitor and submit DMRs may no longer be concerns. See **Attachment E** for post inspection correspondence and Notice of Termination.

G. Outdoor Storage and Staging

Section 2.1.2.1 of the 2021 MSGP states that you must “minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and stormwater in order to minimize pollutant discharges by either locating these industrial materials and activities inside or protecting them with storm resistant coverings.”

During the inspection, we observed two areas of the Facility that had outdoor storage and staging of uncovered wood pallets that would be exposed to the elements. Although the wood pallets are not washed down nor chemically treated, it might be possible for the pallets to harbor other pollutants such as wood debris or sediment that may be discharged with stormwater.

On June 29, 2021, the Facility submitted a Notice of Termination and a supporting map attached to IDEQ for processing. City of Caldwell drawings confirmed there was an underground shallow well stormwater injection system and that stormwater did not discharge out of the Facility, hence outdoor storage and staging may no longer be a concern. See **Attachment E** for post inspection correspondence and Notice of Termination.

H. Stormwater Pollution Prevention Plan

Section 6.2 of the 2021 MSGP outlines required contents of the SWPPP.

During the records review of the inspection, the SWPPP onsite was outdated and not current for the 2021 MSGP requirements. An updated SWPPP dated May of 2021 was submitted to EPA electronically to EPA post-inspection. The May 2021 SWPPP was signed by Ms. McCurry but not dated. This SWPPP’s site map was missing locations of stormwater control measures, locations of potential pollutant sources (although these were fully described in Section 2 of the SWPPP), and indication that one or more discharge points are “substantially identical” (although this was fully described in

Section 4.5 of the SWPPP). The SWPPP did not fully identify specific stormwater control measures to keep drains and outfalls clear of litter and debris such as containment socks and witch's hats that were observed during the site walkthrough. It did not specify that the Facility was required to monitor for Total Suspended Sediments, *E. coli*, and Total Phosphorus per EPA's letter dated May 19, 2021 on additional impaired waters monitoring. Additionally, the SWPPP did not address major storm event mitigation measures.

On June 29, 2021, the Facility submitted a Notice of Termination and a supporting map attached to IDEQ for processing. City of Caldwell drawings confirmed there was an underground shallow well stormwater injection system and that stormwater did not discharge out of the Facility, hence the Facility no longer requires a SWPPP and SWPPP deficiencies may no longer be a concern. See **Attachment E** for post inspection correspondence and Notice of Termination.

I. Posted Permit Coverage Sign

Section 1.3.5 of the 2021 MSGP outlines the requirement for a facility to post a sign of its permit coverage.

The Facility did not have a sign of permit coverage posted.

On June 29, 2021, the Facility submitted a Notice of Termination and a supporting map attached to IDEQ for processing. City of Caldwell drawings confirmed there was an underground shallow well stormwater injection system and that stormwater did not discharge out of the Facility, hence the Facility no longer requires permit coverage sign and lack of signage may no longer be a concern. See **Attachment E** for post inspection correspondence and Notice of Termination.

J. Conditional Exclusion for No Exposure

Section 1.5 of the 2021 MSGP outlines eligibility for a "no exposure" exclusion and filing of a No Exposure Certification.

The Facility determined post inspection that stormwater onsite infiltrates into a shallow well injection system and did not discharge out of the Facility. It is uncertain why this was unknown to the Facility given that it had permit coverage with both the 2015 and 2021 MSGPs, both of which required SWPPP development and implementation. The analysis and process to properly develop the Facility's SWPPP for both permits did not fully ascertain what happened to stormwater at the Facility once it went down any of the drains. If it was known sooner, the Facility could have submitted a No Exposure Certification to EPA. However, a Notice of Termination was submitted to IDEQ on June 29, 2023 for processing, hence not filing a No Exposure Certification may no longer be a concern.

K. Records Not Retained Onsite

Section 7.7 of the 2021 MSGP states that the Facility must retain copies of the

SWPPP, all permit reports and certifications, monitoring data, data used to complete the NOI, and additional documentation concerning corrective actions or AIM responses for at least three years.

The Facility did not have the following records/documentation onsite in hard copy nor electronically at the time of inspection:

- 2021 MSGP – the permit itself (previous 2015 version was onsite)
- Updated SWPPP addressing 2021 MSGP requirements
- DMRs for all monitoring requirements and events
- Laboratory Analysis Reports and Chain of Custody forms for all monitoring
- Annual reports
- Data used to submit 2021 NOI

Mr. Murkle indicated the above records were maintained offsite with Ms. McCurry in the Arkansas office.

On June 29, 2021, the Facility submitted a Notice of Termination and a supporting map attached to IDEQ for processing. City of Caldwell drawings confirmed there was an underground shallow well stormwater injection system and that stormwater did not discharge out of the Facility, hence the Facility no longer requires permit coverage sign and lack of proper recordkeeping on site may no longer be a concern. See **Attachment E** for post inspection correspondence and Notice of Termination.

X. Closing Conference

Following the walk-through and file review, a closing conference was held with Mr. Murkle where we discussed our observations, the areas of concern, and next steps regarding inspection report transmittal. We thanked him for his time and cooperation with the inspection. Closing conference concluded at 1:02PM.

ATTACHMENT A

Aerial Image (Google Earth)



SWPPP Site Layout with Drainage



ATTACHMENT C

Photograph Log

All photographs taken by Vanessa Oquendo on May 23, 2023

Olympus Tough TG-6/F2.0 Camera

Photo Log- Propak Corporation - Boise



Photo #:01 (P5230001)

Description: Facing west, photo of storm drain (outfall 005) with witch's hat inside drain cover and with sock in main facility parking area.



Photo #:02 (P5230004)

Description: Facing southwest, photo of a food truck in main facility parking area.



Photo #:03 (P5230013)

Description: Facing west, photo of outfall 004 in facility's main parking area and additional city stormwater drain near the street not connected to the facility's stormwater drainage.



Photo #:04 (P5230020)

Description: Facing north, photo of a trailer in the facility's northern trailer drop lot.

Photo Log- Propak Corporation - Boise



Photo #:05 (P5230027)

Description: Facing northwest, photo of the vegetative swale that absorbs sheet flow from the trailer drop lot. Area identified as outfall 003, but water in area determined to simply infiltrate.



Photo #:06 (P5230031)

Description: Facing west, photo of shipping and receiving dock area with smaller drain that directly drains into "A Drain" but not identified as a facility outfall.



Photo #:07 (P5230035)

Description: Facing north, photo of additional stormwater drains on eastern side of the facility not identified as facility outfalls, however sampling for outfall 002 is taken at these drains due to sufficient drainage in them compared to drainage in outfall 002.



Photo #:08 (P5230039)

Description: Facing east, photo of inside storm drain cover for outfall 002 showing signs of receiving insufficient drainage.

Photo Log- Propak Corporation - Boise



Photo #:09 (P5230045)

Description: Facing northeast, photo of outfall 001 on the eastern side of the facility.



Photo #:10 (P5230047)

Description: Facing west, photo of another of facility shipping and receiving area with light debris on the ground.



Photo #:11 (P5230053)

Description: Facing east, photo of outdoor pallet storage area on the southeastern part of the facility.



Photo #:12 (P5230058)

Description: Facing east, photo of the facility's southeastern entrance/exit blocked off to discourage regular vehicle traffic driving through facility grounds as a facility safety measure. This entrance/exit may benefit from stormwater control measures to prevent stormwater from entering the street.

Photo Log- Propak Corporation - Boise



Photo #:13 (P5230062)

Description: Facing south, photo of trash hopper without a lid on the southern part of the facility and part of the gravel spit that runs along the facility's southern perimeter with light debris.



Photo #:14 (P5230066)

Description: Facing north, photo of outfall 006 with worn sock in need of replacement.



Photo #:15 (P5230069)

Description: Facing west, photo of the facility's main uncovered dumpster along with some outdoor wood pallet storage and staging area.



Photo #:16 (P5230073)

Description: Facing north, photo of outdoor storage of propane tanks. Tanks are stored outside for safety reasons but are inspected weekly during Ferrell Gas fill-ups.

Photo Log- Propak Corporation - Boise



Photo #:17 (P5230076)

Description: Facing north, photo of a loading and unloading dock at the southern end of the facility's main building.



Photo #:18 (P5230082)

Description: Facing east, photo looking at southwestern corner of the facility's main building showing impervious area that may drain to additional stormwater drain next to the facility's main southwestern entrance/exit not labeled as an outfall.



Photo #:19 (P5230083)

Description: Facing north, close up photo of the additional stormwater drain next to the facility's main southwestern entrance/exit not labeled as an outfall. Where stormwater went once it entered this drain was unknown to the facility at the time of inspection.



Photo #:20 (P5230085)

Description: Facing north, photo of the additional stormwater drain with background next to the facility's main southwestern entrance/exit not labeled as an outfall.

Photo Log- Propak Corporation - Boise



Photo #:21 (P5230087)

Description: Facing southwest, photo facility's main southwestern entrance/exit where stormwater could possibly exit the facility onto the street. This area could benefit from stormwater controls.



Photo #:22 (P5230113)

Description: Photo of the assembly line in the facility's main building to load, sort, and stack pallets that then feed to builders to conduct repair work on pallets before they are returned to the assembly line.



Photo #:23 (P5230114)

Description: Photo of the facility's spill kit in main building.



Photo #:24 (P5230117)

Description: Photo of red-colored dumpster next to the painting part of the pallet repair process. Paint tote uses secondary containment.

Photo Log- Propak Corporation - Boise



Photo #:25 (P5230123)

Description: Photo of gas tanks inside the facility's main building that are normally stored in a flammable locker but were out to be filled.



Photo #:26 (P5230127)

Description: Photo of the facility's older SWPPP cover page from February 2018. Updated version electronically sent post inspection.

ROUTINE FACILITY INSPECTION FORM

FD-302 (Rev. 10-6-95)
 FBI - Cincinnati
 Cincinnati, OH 45201
 Inspection Date and Time
 Inspection Location

Officer(s)

Any of the following conditions exist?
 Condition 1 ☒ Yes
 Condition 2 ☒ Yes
 Condition 3 ☒ Yes
 Condition 4 ☒ Yes
 Condition 5 ☒ Yes
 Condition 6 ☒ Yes
 Condition 7 ☒ Yes
 Condition 8 ☒ Yes
 Condition 9 ☒ Yes
 Condition 10 ☒ Yes
 Condition 11 ☒ Yes
 Condition 12 ☒ Yes
 Condition 13 ☒ Yes
 Condition 14 ☒ Yes
 Condition 15 ☒ Yes
 Condition 16 ☒ Yes
 Condition 17 ☒ Yes
 Condition 18 ☒ Yes
 Condition 19 ☒ Yes
 Condition 20 ☒ Yes
 Condition 21 ☒ Yes
 Condition 22 ☒ Yes
 Condition 23 ☒ Yes
 Condition 24 ☒ Yes
 Condition 25 ☒ Yes
 Condition 26 ☒ Yes
 Condition 27 ☒ Yes
 Condition 28 ☒ Yes
 Condition 29 ☒ Yes
 Condition 30 ☒ Yes
 Condition 31 ☒ Yes
 Condition 32 ☒ Yes
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 Condition 214 ☒ Yes
 Condition 215 ☒ Yes
 Condition 216 ☒ Yes
 Condition 217 ☒ Yes
 Condition 218 ☒ Yes
 Condition 219 ☒ Yes
 Condition 220 ☒ Yes
 Condition 221 ☒ Yes
 Condition 222

Photo #:27 (P5230130)

Description: Photo of one of the facility's quarterly routine inspection sheets dated 4/17/23 with observations including corrective actions taken.

QUARTERLY VISUAL ASSESSMENT

Directions: Visually examine each outfall associated with industrial activity on a quarterly basis. The examination shall be made of grab samples collected within the first 30 minutes of when the runoff begins discharging. All samples shall be from a storm event that results in an actual discharge from your site ("measurable storm event") that follows the preceding measurable storm event by at least 72 hours (3 days). Discharge may be the result of snowmelt.

PRD-001 - Colorado
1315 United Parkway
Boulder, CO 80502

Quarter # 1st
Date 12/1/02

Type of Event:
If Rain, Duration of Storm Event (Hours):
Rainfall Total (Inches):

Runoff:
If Rain, Duration of Storm Event (Hours):
Rainfall Total (Inches):

Sources:
not enough to collect

Outfall #1

Time: 11:00 AM
Color: clear
Odor: clear
Taste: clear
Sight: clear
Floating Solids: none
Settled Solids: none
pH: 7.0
Iron: none
Oil Sheen: none
Other: none
Possible Sources:

Outfall #2

Time: 11:00 AM
Color: clear
Odor: clear
Taste: clear
Sight: clear
Floating Solids: none
Settled Solids: none
pH: 7.0
Iron: none
Oil Sheen: none
Other: none
Possible Sources:

Outfall #3

Time: 11:00 AM
Color: clear
Odor: clear
Taste: clear
Sight: clear
Floating Solids: none
Settled Solids: none
pH: 7.0
Iron: none
Oil Sheen: none
Other: none
Possible Sources:

Outfall #4

Time: 11:00 AM
Color: clear
Odor: clear
Taste: clear
Sight: clear
Floating Solids: none
Settled Solids: none
pH: 7.0
Iron: none
Oil Sheen: none
Other: none
Possible Sources:

Outfall #5

Time: 11:00 AM
Color: clear
Odor: clear
Taste: clear
Sight: clear
Floating Solids: none
Settled Solids: none
pH: 7.0
Iron: none
Oil Sheen: none
Other: none
Possible Sources:

Outfall #6

Time: 11:00 AM
Color: clear
Odor: clear
Taste: clear
Sight: clear
Floating Solids: none
Settled Solids: none
pH: 7.0
Iron: none
Oil Sheen: none
Other: none
Possible Sources:

Other Observations:

Broken glass in dirt next to the drop lot

If no sample was collected during the Quarter (i.e., Adverse Weather Conditions), explain reasons and rationale:

not enough to collect.

Personal Performance Visual Assessment

not
PRD

(Print) 12/1/02 (Date)
(Signature)

Photo #:28 (P5230137)

Description: Photo of one of the facility's quarterly visual assessment forms with observations outlined for each of the six outfalls dated 12/7/22.

ATTACHMENT D

EPA Letter for Additional Impaired Waters Monitoring

ATTACHMENT E

Post Inspection Correspondence