NPDES Compliance Inspection Report

Weyerhaeuser – Santiam Lumber
Lebanon, Oregon

Permit #: ORR221262

Inspection Date: December 16, 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:

RAYMOND ANDREWS Digitally signed by RAYMOND ANDREWS
Date: 2022.02.25 14:28:56 -08'00'

Supervisor Signature/Date:

PETER CONTRERAS Digitally signed by PETER CONTRERAS
Date: 2022.02.25 14:43:17 -08'00'

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(All details in this report were obtained through conversations with Mr. Spencer Headley, Unit Manager, Mr. Jack Carter, Regional Environmental Manager, and Ms. Christine Yanik, Facility Environmental Manager, review of facility documents or observations made during the inspection.)

I. Facility Information

Facility Name:	Weyerhaeuser – Santiam Lumber
Facility Owner/Operator:	Weyerhaeuser Company
Physical Address:	30233 Santiam Highway Lebanon, Oregon 97355 Linn County
Lat/Long:	44.47235, -122.81443
Mailing Address:	30440 Fairview Road Lebanon, Oregon 97355
NAICS Code:	321113 (Sawmills)
SIC Code:	2421 (Sawmills & Planing Mills, general)
Facility Contacts:	Spencer Headley Unit Manager Office Phone: 541-248-6658 Email: spencer.headley@weyerhaeuser.com Jack Carter Regional Environmental Manager Office Phone: 541-607-0279 Email: jack.carter@weyerhaeuser.com Christine Yanik Facility Environmental Manager Office Phone: 541-409-7770 Email: christineyanik@weyerhaeuser.com
Permit Number:	ORR221262
Receiving Water:	Unnamed ditch → Vail Creek → South Santiam River

II. Inspection Information

Inspection Date:	December 16, 2021

Inspector:	Raymond Andrews, Inspector EPA Region 10, ECAD /FDDWES Phone: 206-553-4252
Arrival Time:	9:00 AM
Departure Time:	2:40 PM
Weather:	Overcast, 41°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

Weyerhaeuser – Santiam Lumber is permitted under the Oregon 1200-Z National Pollutant Discharge Elimination System (NPDES) Stormwater Discharge Permit ("Permit"). The Facility's current permit, NPDES permit # ORR221262, became effective on July 1, 2021, and will expire on June 30, 2026. The facility is permitted under Sector A (General Sawmills and Planing Mills) of the permit.

IV. Background

Weyerhaeuser – Santiam Lumber ("Facility") located at 30233 Santiam Highway in Lebanon, Oregon is owned and operated by Weyerhaeuser Company.

The facility has not been inspected in the past 5-years and has had no action, formal or informal, taken against it.

V. Inspection Chronology

This was an announced inspection. On December 6, 2021, I emailed Ms. Christine Yanik and told her I would be conducting an industrial stormwater compliance of the Weyerhaeuser facility in Lebanon, Oregon on December 16th.

I conducted an opening conference, which included an interview of Mr. Spencer Headley, Unit Manager, Mr. Jack Carter, Regional Environmental Manager, and Ms. Christine Yanik, Facility Environmental Manager, followed by a records review, a site inspection, and a closing conference.

VI. Opening Conference

I arrived at the facility at 9:00 am and presented my credentials to Mr. Headley, Mr. Carter, and Ms. Yanik.

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 facility has been in operation at its current location since 2008, and has approximately 170 full time employees. It operates three production shifts and a maintenance shift.

- Day Shift – Monday through Thursday, 5:00am until 3:00pm
- Swing Shift – Sunday through Wednesday, 5:00pm until 3:30am
- 3rd Shift – Thursday through Saturday, 5:00pm until 6:30am
- Maintenance Shift – Friday through Sunday, 4:00am until 5:30pm

The site is generally flat and covers approximately 124-acres. Most of the site is unpaved and consists of vegetation and bare ground. Approximately 28-acres (≈ 23%) of the area is impervious and covered by buildings or asphalt. Approximately 96-acres (≈ 77%) is pervious and consists of bare ground or vegetated areas.

The facility's primary operation is production of green dimensional lumber from raw timber. The lumber is called "green" because it is not kiln dried.

Vehicle washing is conducted on-site in a covered washing station that has a catch basin and water recycler.

According to usclimatedata.com, Lebanon, Oregon, receives approximate average annual precipitation of 46.42 inches. November is the wettest month with approximate average precipitation of 7.69 inches, while August is the driest month with approximate average precipitation of 0.62 inches.

During rainfall events, there is some sheet flow across the site. The stormwater is collected in catch basins and drainage ditches.

All lumber production is conducted indoors. Outdoor activities with potential exposure to stormwater include loading and unloading of logs, storing of raw timber, and storing of finished products that have been packaged and are awaiting ship-out.

The facility initially had 11 discharge points, numbered 001 – 011. Discharge Points (DP) 002 and 008 were eliminated. DP002 was removed when the ditch receiving the discharge was remove and DP008 was removed when its flow was rerouted to the "Fire Pond". The facility currently has nine discharge points but only three monitoring points. The Monitoring Points (MP) are designated MP001, MP005, and MP006.

Only DP001, DP005, and DP006 are being monitored because the facility determined those points are substantially similar to the other six active discharge points. Section 6.2 of the facility's SWPCP explains which discharge points are substantially similar to the monitored points.

VII. Laboratory Inspection

The facility has statewide benchmarks, and a sector-specific, monitoring requirements. The statewide benchmark parameters are pH, total suspended solids (TSS), total copper (Cu), total lead (Pb), and total zinc (Zn). The sector-specific pollutant monitoring parameter is chemical oxygen demand (COD).

When the new iteration of the Oregon 1200-Z permit became effective, all monitoring waivers expired. No new monitoring waivers will be approved until the facility has conducted four quarters of sampling under the new permit requirements.

The facility does not conduct any sampling or analysis of stormwater samples. Stormwater sampling is conducted by :

Valley Science & Engineering, Inc.
3511 Pacific Boulevard SW
Albany, Oregon 97321
(541) 926-7737

Valley Science collects stormwater samples, conducts pH analysis, and prepares the facility's Discharge Monitoring Reports (DMRs).

Total suspended solids (TSS), total copper (Cu), total lead (Pb), total zinc (Zn), and chemical oxygen demand (COD) are analyzed by:

Pace Analytical Services, Inc
10260 SW Nimbus Avenue
Suite M-8
Tigard, Oregon 97223
(503) 250-0977

VIII. File Review

The Oregon 1200-Z permit requires documentation be retained for a minimum of three years.

I reviewed the following records and documents:

- Stormwater Pollution Control Plan (SWPCP) – revised August 25, 2021
- SWPCP Site Maps
- Permit Reissuance Letter – dated June 15, 2021
- Monthly Facility Inspection Reports – January 2019 through December 2021
- Discharge Monitoring Reports (DMRs) – 1Q 2019 – 4Q 2021
- Chain of Custody Documents (CoCs) – 1Q 2019 – 4Q 2021
- Annual Employee Training Records – 2019 through 2021

- Tier I Reports – November 2018 – November 2021
- Tier II Corrective Action Reports – dated December 20, 2019

The facility submitted 11 Tier I reports for benchmark exceedances during the reviewed period. The table, below, provides the date the report was generated, the outfall where the exceedance occurred, and the benchmarks exceeded.

Date of Report	Outfall	Benchmarks Exceeded
November 27, 2018	001	COD
	002	Zn
	005	TSS
December 20, 2018	001	COD
	002	Zn
February 21, 2019	001	Cu
	002	Zn, Cu, TSS, COD
September 18, 2019	001	Cu, TSS, COD
	002	Zn
	005	Cu, Zn, COD
December 21, 2019	001	TSS, COD
	002	Cu, Zn, TSS, COD
	005	Cu, TSS, COD
March 30, 2020	001	Cu, TSS, COD
	002	Zn, TSS
	005	Cu, Zn, TSS, COD, pH
November 23, 2020	001	Cu, TSS, COD
	005	Cu, Zn, TSS, COD
December 11, 2020	001	Cu, TSS, COD
	005	Cu, Zn, TSS, COD
	006	Cu, Zn, TSS, COD
January 27, 2021	001	Cu, Zn, TSS, COD
	005	TSS, COD
	006	Cu, Zn, TSS, COD
March 05, 2021	001	Zn, COD
	006	Zn, TSS
November 30, 2021	001	Cu, COD

IX. Site Inspection

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

Following the records review, Mr. Headley. Mr. Carter and Ms. Minten, collectively referred to as "the Representatives", took me on a tour of the site.

As stated in Section VI of this report, the facility has nine active discharge points but only three points are monitored due to the facility's claim that six of the nine discharges are "substantially identical" to the other three points.

From the office, we headed to the perimeter fence on the west side of the site because several discharge points discharge into a ditch that lies adjacent to the western perimeter fence. Along our route, we came to the vehicle wash bay (**Photo 1**). The bay is graded so wash water flows to the back wall which has cut-outs to allow water to flow through and enter a ditch. The ditch holds the water which is then pumped into a water recycler for reuse.

As we continued west, we passed lumber packaged and awaiting ship-out (**Photo 2**). Photo 2 also shows puddles of residual stormwater from a recent rain event. Although there were residual puddles throughout the site, no flow was occuring at the time of my visit.

The monitoring point (MP) 006 (**Photos 3 & 4**) is a catch basin situated in the thoroughfare near some lumber that is awaiting ship-out. During sampling, the grate is removed, and a grab sample is collected. A sediment filter is visible in the grate for MP-006. The basin also has a zinc filter insert, which is not visible. The stormwater continues traveling until it discharges into a ditch outside the perimeter fence. The narrative of the SWPCP seems to conflict with the site map, my observances, and conversations with the Representatives. The SWPCP says "monitoring site 006 is located at discharge point 005". The monitoring point is several hundred feet from the discharge point. DP-005 through DP-007 were submerged at the time of the inspection.

We followed the western perimeter fence and turned slightly north to arrive at the site's "Fire Pond". Discharge Point 008 was eliminated when the flow was diverted to the Fire Pond. Stormwater enters the Fire Pond on the east end (**Photo 5**). On the west end of the pond (**Photo 6**) is an overflow control. Once the water in the pond tops the culvert opening (**Photo 7**), it is discharged into a ditch by DP-009 (**Photo 8**).

We continued our tour by turning west and heading to DP-010 (**Photo 9**). DP-010 drains stormwater from the employee parking area and discharges the stormwater int0 a ditch (**Photo 10**). In photos 9 and 10, a filter sock is also observed. The filter sock is used to remove sediment and other particulate matter from the water as it flows.

As we were walking the site, I observed stormwateRx™ Zinc-B-Gone filtration systems (**Photo 11**). The filtration systems reduce the amount of zinc in the stormwater coming from the facility's rooftops. The facility has four of the zinc filtration systems located near buildings at various points around the site.

We turned east and proceeded to the settling basin. The settling basin receives water from the nearby log yard. The basin uses filter socks to slow water flow and filer out particulate matter (**Photos 12 – 14**).

Monitoring Point 005 (**Photo 15**) is at the end of the settling basin just prior to the bioswale (**Photos 16 & 17**) . A grab sample is collected as the water tops the filter sock seen in the middle of photo 15. The water will remain in the bioswale until it infiltrates or evaporates.

Monitoring Point 001 was located at the far southeastern portion of the site. Due to its distance, the Representatives and I agreed that we'd drive to MP-001. The Representatives used a company vehicle and I followed in my personal vehicle. MP-001 (**Photo 18**) receives stormwater from the log yard (**Photos 19 & 20**) through a series of collection ditches and connecting culverts. MP-001, also known as, DP-001, discharges into a retention ditch (**Photo 21**).

X. Areas of Concern

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

A. SWPCP

1. 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."

   Upon review of the facility's SWPCP and site map, I found the narrative in the SWPCP did not match the information acquired from the map. The SWPCP says "monitoring site 006 is located at discharge point 005". The map appears to show, and my observations on the ground would support, that monitoring site 006 is several hundred feet from discharge point 005. It does not appear that the SWPCP is current.

2. Schedule A.10.e of the Permit states the SWPCP must contain "Operation and Maintenance Plans - Include an operation and maintenance plan for active and passive treatment systems and mass reduction measures. The O&M plan must include, as appropriate to the type of treatment system, items such as system schematic, manufacturer's maintenance/operation specifications, chemical use, treatment volumes and a monitoring or inspection plan and frequency. For passive treatment and low impact development control measures, such as mass reduction measures, include routine maintenance standards."

   Upon review of the facility's SWPCP, I found the document did not adequately meet the requirement for "Operations and Maintenance Plans". For example, the SWPCP did not contain the "system schematic, and manufacturer's maintenance/operation specifications" for the stormwateRx ™ Zinc-B-Gone filtration system.

B. Monitoring

Schedule B.7.c of the Permit states each discharge point must be monitored unless:

> "ii. Discharge point has effluent that is substantially similar to the effluent(s) of a monitored discharge point and the same BMPs are implemented and maintained at the substantially similar discharge points or drainage areas that lead to the discharge points. Substantially similar effluent(s) are discharges from drainage areas serving comparable

activities where the discharges are expected to be similar in composition. The **determination** of substantial similarity of effluent(s) **must be based on past monitoring data or an analysis** supporting that the discharge points are substantially similar. **The supporting data or analysis must be included in the SWPCP.** This provision does not apply to discharge point(s) subject to a numeric effluent limit." [Emphasis added,]

The facility has nine discharge points but is only monitoring three points, DP001, DP005, and DP006, because it claims the other six points are "substantially similar" to one of the monitored points. The SWPCP contains a section explaining the "substantially similar" designation for each of the three points as required by Schedule A.10.b.x of the Permit, but the SWPCP does not contain the required data or supporting analysis.

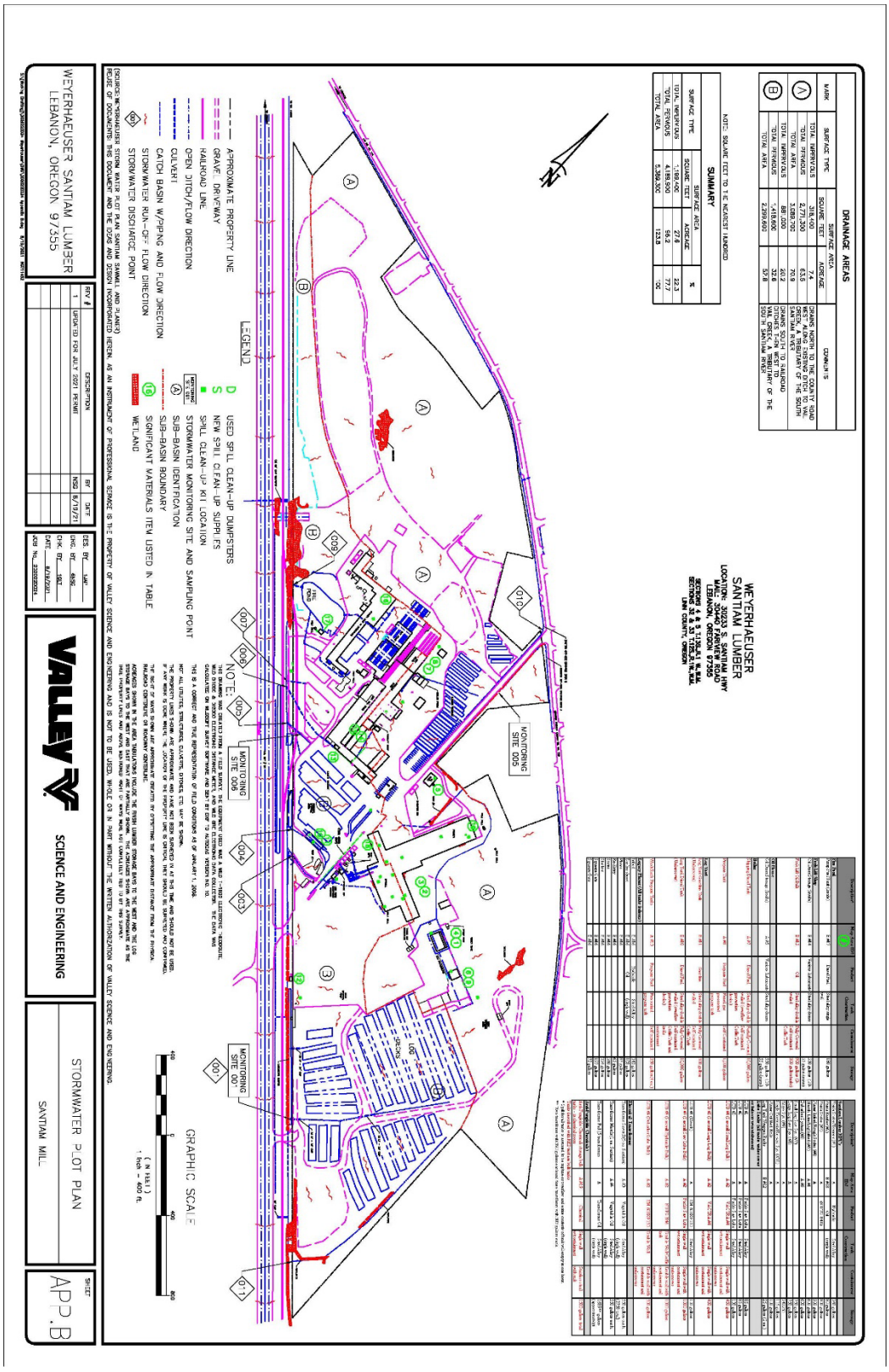
XI. Closing Conference

On December 16, 2021, I held a closing conference with Mr. Headley, Mr. Carter, and Ms. Yanik at MP-001 rather than driving back to the office. 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

Site Diagram Provided by Facility



ATTACHMENT B

Inspection Photographs and Photograph Log

(Photographs taken by Ray Andrews on December 16, 2021, with a Panasonic DMC-FH25 camera)

Photo 1 / P1010091 – Truck Wash Bay

Photo 2 / P1010092 – Lumber Awaiting Ship-out

Photo 3 / P1010093 – Catch Basin/Monitoring Point 006

Photo 4 / P1010094 – Catch Basin/Monitoring Point 006, close-up

Photo 5 / P1010099 – Fire Pond, east end

Photo 6 / P1010098 – Fire Pond, west end

Photo 7 / P1010101 – Fire Pond Overflow, close-up

Photo 8 / P1010100 – Discharge Point 009

Photo 9 / P1010102 – Discharge Point 010

Photo 10 / P1010103 – Discharge Point 010 flow to drainage ditch

Photo 11 / P1010104 – stormwateRx™ Zinc Filtration System

Photo 12 / P1010105 – Settling Basin, photo 1

Photo 13 / P1010106 – Settling Basin, photo 2

Photo 14 / P1010107 – Settling Basin, photo 3

Photo 15 / P1010108 – Monitoring Point 005

Photo 16 / P1010109 – Bioswale, photo 1

Photo 17 / P1010110 – Bioswale, photo 2

Photo 18 / P1010111 – Monitoring Point 001

Photo 19 / P1010115 – Yard Log, photo 1

Photo 20 / P1010116 – Yard Log, photo 2

Photo 21 / P1010112 – Retention Ditch

Complete list of photographs taken during the inspection:

- P1010079 – Permit Assignment Letter, page 1
- P1010080 – Permit Assignment Letter, page 2
- P1010081 – Employee Training Sign-in Sheet
- P1010082 – SWPCP, cover page
- P1010083 – SWPCP, certification page
- P1010084 – SWPCP, page 5
- P1010085 – SWPCP, page 6
- P1010086 – SWPCP, page 7
- P1010087 – SWPCP, page 17
- P1010088 – SWPCP, page 18
- P1010089 – SWPCP, Record of Revisions page
- P1010090 – Truck Wash Recycler (blurry)
- P1010091 – Truck Wash Bay
- P1010092 – Lumber Awaiting Ship-out
- P1010093 – Catch Basin/Monitoring Point 006
- P1010094 – Catch Basin/Monitoring Point 006, close-up
- P1010095 – Discharge Point 007, photo 1
- P1010096 – Discharge Point 007, photo 2
- P1010097 – Discharge Point 006
- P1010098 – Fire Pond, west end
- P1010099 – Fire Pond, east end
- P1010100 – Discharge Point 009
- P1010101 – Fire Pond Overflow, close-up
- P1010102 – Discharge Point 010
- P1010103 – Discharge Point 010 flow to drainage ditch
- P1010104 – stormwateRx™ Zinc Filtration System
- P1010105 – Settling Basin, photo 1
- P1010106 – Settling Basin, photo 2
- P1010107 – Settling Basin, photo 3
- P1010108 – Monitoring Point 005
- P1010109 – Bioswale, photo 1
- P1010110 – Bioswale, photo 2
- P1010111 – Monitoring Point 001
- P1010112 – Retention Ditch, photo 1
- P1010113 – Retention Ditch, photo 2
- P1010114 – Retention Ditch, photo 3
- P1010115 – Yard Log, photo 1
- P1010116 – Yard Log, photo 2